



## Overview and Scrutiny Committee

### Good Developer Engagement Protocol

**Date:** 4 July 2023

**Key decision:** No

**Class:** Part 1

**Ward(s) affected:** All

**Contributors:** Head of Development Management

### Outline and recommendations

The purpose of this report is to provide the Overview and Scrutiny Committee (OSC) with an overview for how the Planning Service undertakes statutory consultation on planning applications. The Committee is asked to discuss with an expert panel of representatives undertaking community engagement for examples and methods that could be considered best practice, which would inform Planning Service proposals to publish Developer Engagement Protocol, designed to improve engagement between developers of sites with the public and key stakeholders.

The recommendations of this report are:

- To note the role of the Council in encouraging pre-application engagement to be undertaken by developers and consultation with communities
- To note how the Council undertakes its statutory consultation
- Consider how best practice examples from the Panel could inform a Planning Service Developer Engagement Protocol

## Timeline of engagement and decision-making

July 2006 – adoption of the current Statement of Community Involvement was adopted in July 2006.

May 2018 – Mayor Damien Egan promises to launch a review that will make the Council 'even more democratic, open and transparent'

July 2018 – Full Council agrees to establish a Local Democracy Review Working Group consisting of eight councillors. They are tasked with making recommendations about how the Mayor and Council could enhance their openness and transparency, increase public involvement in Council decisions and promote effective decision-making

September 2018 to January 2019 – the Working Group gathers evidence from a wide range of residents, community groups and local councillors (including an online questionnaire completed by over 700 respondents, workshops at four secondary schools and attendance at over 40 events)

January to March 2019 – the Working Group collects their evidence into a final report, which identifies 57 recommendations for change

March/April 2019 – Mayor & Cabinet and Full Council agree the report and recommendations

April 2019 to March 2020 – the retained Local Democracy Working Group oversees delivery of the recommendations

February 2020 – the Local Democracy Working Group welcomed the direction of travel for recommendations 25-30 which propose improvements to the planning service, including "*If required, the Planning Statement of Community Involvement should be reviewed in line with the democratic standards once developed, and the other relevant recommendations made within this report (#30)*"

June 2020 – temporary changes agreed to the Council's Statement of Community Involvement (SCI) to facilitate virtual meetings for a period of 3 months

September 2020 – temporary changes to the SCI are extended for a period of 6 months due to the ongoing pandemic and consultation on permanent changes to those sections addressing planning policy consultation agreed

December 2020 – permanent changes to the SCI to those sections addressing planning policy consultation approved by Mayor and Cabinet.

February 2021 – update to the Local Democracy Working Group (LDWG) on proposals to increase the openness and transparency around the planning process, particularly focused on effective decision making at planning committees which were endorsed by the LDWG. This included the Planning Service preparing a new SCI following the development of proposals and a period of engagement with amenity societies/community groups and Members.

June 2021 – Community Group meeting to, amongst other matters, update on progress with the LDR work programme

November 2021 – Community Group meeting to, amongst other matters, update on

progress with the LDR work programme

January 2022 – a standalone revision agreed to the SCI at Mayor and Cabinet in relation to Design Review Panels

July 2022 – Community Group Meeting where discussions began on a new working relationship with amenity societies and community groups to begin the period of engagement.

October 2022 – Community Group Meeting continuing engagement with amenity societies including the responses received from the July questionnaire.

October 2022 – an update of the Local Democracy Review project to Sustainable Development Select Committee

1 February 2023 – M&C meeting for approval to start public consultation

February 2023 – Community Group Meeting continuing engagement with amenity societies, highlighting ongoing formal consultation of SCI.

20-February – 3 April 2023 – formal public consultation for the SCI undertaken, with questions asked if the public support proactive developer guidance.

## **1. Summary**

- 1.1. Overview and Scrutiny Committee have asked for an overview of the statutory consultation process of planning applications and how pre-application engagement from developers can be improved, learning from best practice case studies which will inform the Planning Services proposed Good Developer Engagement Protocol.
- 1.2. A Panel of experts will present to the Committee with their experience of high quality and innovative community engagement, how this has created collaboration and trust and how this has helped shaped their pre-application discussions and final planning applications.
- 1.3. The review of best practice community engagement is proposed to inform the Planning Services proposed Good Developer Engagement Protocol which is an outcome from the consultation of the new draft Statement of Community Involvement and Local Democracy Review.

## **2. Recommendations**

- 2.1. It is recommended that Overview and Scrutiny Committee:
  - note the role of the Council in encouraging pre-application engagement to be undertaken by developers and consultation with communities
  - note how the Council undertakes its statutory consultation
  - Consider how best practice examples from the Panel could inform a Planning Service Developer Engagement Protocol

### **3. Policy Context**

- 3.1. The content of this report is consistent with the Council's policy framework. The Planning Service is preparing a new Statement of Community Involvement which will set out how the Council will carry out its statutory function in consulting with the public and other stakeholders when preparing its statutory development plan and supporting documents, and how it will consult on planning applications.
- 3.2. The Council must (as a minimum) comply with statutory requirements for consultation set out in relevant legislation and policy including:
  - The Town & Country Planning (Development Management Procedure) (England) Order 2015 – for planning applications
  - The Planning (Listed Buildings and Conservation Areas) Regulations 1990 (as amended) – for listed building consents
  - Planning and Compulsory Purchase Act 2004 (as amended)
  - The Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended)
  - Localism Act 2011 (as amended)
  - The Neighbourhood Planning (General) Regulations 2012
  - Neighbourhood Planning Act 2017
  - Environmental Assessment of Plans and Programmes Regulations 2004
  - Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020
  - National Planning Policy Framework (NPPF) (2021) and National Planning Practice Guidance (NPPG).
- 3.3. The publication of a Developer Engagement Protocol, whilst not forming new policy, would constitute an important piece of guidance that is designed to be read in association with the Statement of Community Involvement, particularly Part 6 'Planning Applications'.

### **4. Background**

- 4.1. The Council launched the Local Democracy Review in 2018 with a Local Democracy Working Group, comprised of 8 Members tasked with making recommendations about how the Mayor and the Council could enhance openness and transparency in the planning process. In 2020, the Local Democracy Working Group recommended that a new SCI be adopted to replace the out-of-date 2006 adopted version.
- 4.2. Between March and April 2023, the Planning Service carried out formal public consultation on a replacement SCI. This draft document sets out how the Council consults on planning applications and gives great emphasis of the importance that the Council places on effective pre-application engagement and makes a commitment to preparing best practice guidance.
- 4.3. The SCI consultation showed strong support for the preparation of good developer led pre-application engagement protocols.

## 5. Planning Application Consultation

Pre-application stage – applicant led

- 5.1. While there are statutory requirements relating to consultation for planning applications once submitted, there is no such requirement for pre-application engagement.
- 5.2. The NPPF at Para 40, states that:  
*‘Local Planning Authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engaged with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications’.*
- 5.3. The accompanying NPPG promotes the use of pre-application engagement, and Local Planning Authorities providing a range of pre-application services, tailored to the nature of the proposed development and the issues to be addressed.
- 5.4. The National Model Design Code provides detailed guidance to expand on the National Design Guide and seeks to promote high quality design in the built environment. It promotes a range of consultation tools to engage local communities and states that engagement processes can have social benefits such as strengthening community cohesion and making connections between people who might not otherwise have met or interacted.
- 5.5. The Council has an established pre-application service, publicised on the Council website. The pre-application web pages explain the benefits of pre-application advice and list the full range of charges to an applicant. There are a range of services available, tailored to the scale and complexity of projects.
- 5.6. The Planning Service can provide advice for householders via Duty Planner request, whilst major and large-scale regeneration schemes can be managed via Planning Performance Agreements. Pre-application services are paid, to reflect the professional input from staff, and the Planning Service handled 392 separate pre-application requests in 2022.
- 5.7. When the Planning Service engages in pre-application discussions, it will include other Council Directorates/ Service Areas as necessary, for example Strategic Housing, Highways and Transport, Economy and Partnerships to ensure that service areas can contribute to development schemes at an early stage of the design process and developers understand the relevant priorities of the Council. This collaboration across the Council at the stage when schemes are being designed enables a full discussion on technical issues prior to submission. However, it is also a vital stage whereby the Council’s wider aspirations for Lewisham’s places and neighbourhoods can be considered by shaping the type of housing proposed and uses to be included in schemes, plus future job opportunities

as well as community, leisure and cultural opportunities.

Post-submission stage – Council led

- 5.8. The Statement of Community Involvement is a legal document, and its role is to set how the Council will carry out its statutory functions as required by the Development Management Procedure Order (2015) in the consultation of planning applications. This is a formal and legal stage of consultation.
- 5.9. In summary the Council undertakes its statutory functions by:
  - The direct notification of adjoining occupiers (that share a boundary with an application site as a minimum) by letter/ communal foyer notices/ and emails
  - The display of a public Site Notice (in certain circumstances such as works affecting Conservation Areas and Listed Buildings)
  - Publication of a Notice in local press (in certain circumstances such as works affecting Conservation Areas and Listed Buildings)
  - Upload of application documents to the Council website
  - Notification to ward Members
  - Consultation with relevant statutory and non-statutory stakeholders
- 5.10. A report is prepared for each application which summarises the extent of consultation undertaken, and a summary of the content of all representations received. The reports also detail how representations received have informed the recommendation from the case officer to either grant or refuse planning permission.

## **6. Learning from best practice guidance**

- 6.1. In seeking to prepare Good Developer Engagement Protocol, officers have reviewed examples from across London, seeking to establish principles that are supported from other local authorities.

*Southwark – Development Charter*

- 6.2. The Southwark Development Charter (SDC) was published in December 2022 and is designed to be read alongside the SCI. The guidance is tailored to Council Schemes (of any size) and major applications.
- 6.3. The SDC defines three key stages of participation for the community to take part in the planning process (Engage ‘pre-application’, Consult ‘planning application’ and Inform ‘post application’) along with an objective for developers and the role of the Council.
- 6.4. At the first part of the process Engage, the SDC sets out that developers should prepare an ‘Early Engagement Strategy’ for pre-application discussions, which should begin with a Facts-Based Audit of a site which includes stakeholder analysis and a physical appraisal of the site ranging from heritage, accessibility and climate change/ sustainability.
- 6.5. The SDC provides a graphic representation of the Council’s expectations for community engagement setting out what is considered in ‘normal’ and ‘exceptional’ circumstances.

- 6.6. When a developer makes a formal planning application to the Council, an 'Engagement Summary' document is required to be completed and submitted as a validation requirement. The Engagement Summary will be a public document on the Planning register website.
- 6.7. The guidance also states developers are required to prepare proportionate Equalities Impacts Assessments which should include a brief description of the development proposal; an overview of the users of the site and stakeholders in decision making process; and an equality impact and needs analysis to consider the potential impact to groups with protected characteristics. These are required to accompany planning applications.
- 6.8. The Council website contains template Early Engagement Strategies and Engagement Summaries which can be used by applicants.

#### *Westminster – Early Community Engagement*

- 6.9. The Westminster 'Early Community Engagement' (ECE) guidance was published in February 2022.
- 6.10. The guidance set out the requirement for an Early Engagement Strategy, which developers should submit to the Council for review as part of pre-application discussions.
- 6.11. The ECE provides graphic representation of the Council's expectations for community engagement, this promotes householder engagement but is aimed at major development proposals.
- 6.12. Developers are advised to consider how 'vicinity' is defined when scoping out a consultation boundary, and that officers should be engaged at pre-application discussion. The guidance also sets out potential barriers to good engagement being:
  - The capacity and ability of different stakeholders (e.g., visible, and non-visible disability, childcare/caring commitments, or employment commitments)
  - Being members of typically 'rarely heard from' groups such as young people, older people, minority groups or socially excluded groups.
  - Those with limited computer literacy and/or access to technology; and
  - Those with limited literacy and /or numeracy or dominance of oral culture. Ensuring that an engagement strategy is inclusive and accessible to the widest range of community members contributes to its value and legitimacy.
- 6.13. The guidance includes case studies (major and non-major developments) as an appendix. These provide an overview of the engagement undertaken, how schemes were amended following feedback and what learning points were taken from the overall project.
- 6.14. The ECE provides a glossary of terms and links to relevant publications such as national government guidance are included as further appendices.

#### *Fordham Park – Goldsmiths led community engagement*

- 6.15. A project is being undertaken between students at Goldsmiths and secondary pupils at Deptford Green School focussed on researching

Fordham Park and improvements needed. The project taught 12 schoolchildren to undertake research in to their local environmental and social issues, conducting research through creativity, allowing young people to speak and participate in place making in their own language. The project involved an initial 'free mirror' creative writing exercise to open up a more honest conversation with students around their environment to identify topics of interest. Next steps involved creating a film group, a visual arts group and a creative writing group to research the originally identified themes using creative methods. Interviews and questionnaires were also undertaken by students as well as research into policies. This led to an advocacy day and establishing short and long term goals as a 'Pledge Card' for Fordham Park. The project has identified projects that are now being delivered such as a community garden.

*Summary of engagement review*

- 6.16. The review of the Southwark and Westminster guidance shows strong similarities in approaches. Both sets of guidance:
- List who to engage as a minimum
  - State that developers should provide Early Engagement Strategies to the Council as part of pre-application discussions, which allows officers to comment on engagement strategies.
  - Applicants in both cases are required to submit details of community engagement and how feedback has been addressed in a scheme as a Planning Validation requirement.
  - The monitoring of engagement is required through Planning Application validation, with details and evidence of engagement being published on the Council website.
- 6.17. The need to think about who is engaged in pre-application is captured in both documents in different ways. In the Southwark Development Charter, the focus is on an equalities impact about the scheme itself. There is no specific reference to reporting any monitoring information about the protected characteristics of those who have participated in pre-application engagement. The Westminster ECE Guidance includes specific reference to engaging with those who have protected characteristics as well as those who are disengaged. This recognises broader barriers to participation. There is an expectation on larger development to provide data on consultation responses to Planning officers enabling a level of transparency about those who have participated.
- 6.18. In the case of the Southwark Development Charter, the identification of the role for the developer, the planning case officer, and the opportunities for residents during pre-application engagement, statutory consultation and post decision is considered useful for the public who may not understand the planning process.
- 6.19. As mentioned above, the Westminster guidance flags potential barriers to undertaking good quality engagement. Highlighting these issues directly with developers should enable them to understand the expectations of the Council to undertake to ensure wider participation beyond those who normally participate.



- 6.20. Case studies of best practice as seen in the Westminster guidance are considered useful in giving the guidance real life application and context.
- 6.21. The Parklife Project, although not related to a development proposal, provides a valuable case study into the use of creative tools and methodologies that enable the participation of those who do not usually take part in consultation. It is also a useful example of how valuable discussions are about existing places with those who have local 'ownership' of them to then inform approaches. This is a method of engagement that isn't focussed on seeking views on a project that has been prepared but instead empowers local people to form their views and share them to help shape their environment and articulate the outcomes that they want to see. It is also an important means of recognising the value of our existing places to the community and their feelings about it.

## **7. Panel discussion**

- 7.1. Three external organisations have been invited to attend to share their experience of resident engagement in planning developments at the pre-application stage:

Jon Watson and Kate Honey, Landsec

- 7.2. Landsec is a developer which aims to build and invest in buildings, spaces and partnerships to create sustainable places and connect communities. They are one of the largest real estate companies in Europe, with a portfolio of retail, leisure, workspace and residential hubs.

Rod Gonggrijp, Community Plan for Holloway

- 7.3. Rod is chair of the campaign group which is working to ensure the needs of the community are at the heart of the Holloway Prison redevelopment.

George Perfect, Terrapin Group

- 7.4. George Perfect is an Account Director at The Terrapin Group. The Terrapin Group works across public affairs and stakeholder relations, supporting property and development businesses to engage with stakeholders at all levels across London, the South East and beyond.

## **8. Monitoring of effective engagement**

- 8.1. Both the Westminster and Southwark guidance refer to the monitoring of engagement. Lewisham Council already monitors community engagement through its adopted Local Requirements List in July 2022, which sets out the necessary documents required to validate a planning application.
- 8.2. Once all required documentation is submitted (and checked by an officer) an application will be validated, meaning that formal consultation is undertaken, and a professional assessment of the proposals made by the

Case Officer.

8.3. With regard to community engagement, in Lewisham, the existing Local Requirements List requires:

- Community Audit – the purpose is to identify buildings which have community, social and economic value. Community Audits are required to be part of a community engagement strategy and detailed as a standalone document or as part of another document such as the Planning Statement.
- Statement of Community Engagement – required for all major applications which should:
  - o Set out how the applicant has complied with the requirements for pre-application consultation set out in Lewisham’s adopted Statement of Community Involvement.
  - o How the views of the local community have been sought and taken into account in the formulation of development proposals
  - o Identification of the number and type of engagements and number of attendees at those engagements
  - o The Local Requirements List states that pre-application engagement with the Council, whilst welcomed, should not be the only engagement that the applicant sets out within the statement and there is an expectation engagement with the wider community is undertaken prior to an application for planning permission being submitted.

8.4. These documents are uploaded as publicly visible on the Council Planning register website.

8.5. Local Requirements Lists are required to be reviewed every two years.

## **9. Next steps**

9.1. Officers, after taking account of comments and recommendations from OSC, propose to draft the Good Developer Engagement Protocol for publication which would come into immediate effect.

9.2. It is anticipated that this would include guidance on:

- Who to consult and at what stage
- The range of consultation techniques and methods available
- Preparing engagement strategies and what to submit with a planning application
- The potential barriers to effective pre-application engagement and how to potentially address them
- Best practice case studies
- How to ensure that seldom heard groups have an opportunity to meaningfully engage and the monitoring of equalities information. There are opportunities to highlight the benefit of monitoring beyond protected characteristics and include socio economic backgrounds of participants in accordance with the Fairer Lewisham Duty.

- 9.3. The final guidance would be published on the website and promoted by the Planning Service, with the aim of increasing trust between the public and developers, and communities who will be able to share their local knowledge and expertise, which should improve the quality of schemes and reduce controversy when applications are submitted.

## **10. Financial implications**

- 10.1. There are no financial implications directly relating to this report as pre-application engagement is led by a developer/ applicant.
- 10.2. There could, however, be financial implications for schemes which are promoted by the Council if the protocol expectations go beyond current Council best practice.

## **11. Legal implications**

- 11.1. The report explains how what is being proposed relates to the Council's statutory and other obligations. There are no specific legal implications arising from the recommendations set out in the report.
- 11.2. The Equality Act 2010 (the Act) introduced a new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

In summary, the council must, in the exercise of its function, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
  - Advance equality of opportunity between people who share a protected characteristic and those who do not
  - Foster good relations between people who share a protected characteristic and persons who do not share it
- 11.3. The duty continues to be a "have regard duty", and the weight to be attached to it is a matter for the decision maker, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.
- 11.4. The Equality and Human Rights Commission has issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled "Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice". The council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at:

<https://www.equalityhumanrights.com/en/publication-download/technical-guidance-public-sector-equality-duty-england>

## **12. Equalities implications**

- 12.1. The Council's Comprehensive Equality Scheme for 2020-2024 provides an overarching framework and focus for the Council's work on equalities and helps ensure compliance with the Equality Act 2010.
- 12.2. There are no proposals to change how the Council consults on planning applications – as this is a statutory requirement set by the Government. Consultations are carried out in accordance with legislation and on a geographical basis, ensuring that all residents are directly contacted by letter when a proposal is received adjoining their property (or a larger area for schemes of larger scale)
- 12.3. The intention behind the Good Developer Engagement Protocol is that residents are much better informed by developers at an early stage when there is a chance to influence a scheme. Good developer engagement must seek to engage seldom heard voices in the borough and maximise views of the public. The guidance is intended to identify barriers to engagement so that attempts can be made to actively overcome them. It is also intended to identify the need to include equalities monitoring to show who has engaged.

## **13. Climate change and environmental implications**

- 13.1. The Planning Service expect that developers discuss plans for community engagement with Officers which include an overview for how consultation also considered climate change and environmental implications. For example, the printing of material and use of online methods of consultation.

## **14. Crime and disorder implications**

- 14.1. There are no crime and disorder implications.

## **15. Health and wellbeing implications**

- 15.1. There are potential positive health and wellbeing implications from improved consultation. Empowering communities to participate more meaningfully in the shaping of their neighbourhoods can have positive implications on wider determinants of health.

## **16. Background papers**

- 16.1 Lewisham Statement of Community Involvement 2006  
<https://lewisham.gov.uk/myservices/planning/policy/ldf/statement-of-community-involvement>
- 16.2 Lewisham Get Planning Advice  
<https://lewisham.gov.uk/myservices/planning/apply-for-planning-permission/get-planning-advice>
- 16.3 Sustainable Development Select Committee October 2022  
<https://councilmeetings.lewisham.gov.uk/ieListDocuments.aspx?CId=136&MId=7915&Ver=4> (Item 4)

- 16.4 Mayor and Cabinet 11 February 2023  
<https://councilmeetings.lewisham.gov.uk/ieListDocuments.aspx?CId=139&MId=7981&Ver=4> (Item 9)
- 16.5 Local Requirements List October 2022  
<https://lewisham.gov.uk/myservices/planning/apply-for-planning-permission/planning-validation-requirements>
- 16.6 Southwark 'Development Consultation Charter' December 2022  
<https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-guidance/view-our-statement-of-community-involvement?displaypref=large-contrast>
- 16.7 Westminster 'Early Community Engagement' February 2022  
<https://www.westminster.gov.uk/media/document/early-community-engagement-guidance-feb-2022>
- 16.8 Parklife project blogs  
<https://sites.gold.ac.uk/educational-studies-blog/how-can-we-help-young-people-improve-their-local-environments-how-can-they-become-agents-of-change/>  
<https://sites.gold.ac.uk/educational-studies-blog/exciting-developments-with-the-parklife-project-a-community-garden-will-be-coming-soon/>
- 16.9 Parklife project youtube presentation  
<https://www.youtube.com/watch?v=R3ppVIUMjo8>
- 16.10 Land Securities Community Charter  
[Landsec Community Charter website.pdf](#)
- 16.11 Fairer Lewisham Duty Update, November 2021  
<https://councilmeetings.lewisham.gov.uk/documents/s90981/04UpdateonresponsetorecsEqualitiesReviewSSCSC041121.pdf>
- 16.12 Glossary

Term	Definition
Statement of Community Involvement	The SCI forms part of the Local Development Framework and is a legal planning requirement. It sets out the Council's policy for involving and communicating with interested parties in matters relating to the preparation and revision of local development framework documents and the exercise of the authority's functions in relation to planning applications.

Term	Definition
Local Requirements List	A published list of information requirements for applications for planning permission. These requirements should be kept to the minimum needed to make decisions.
Planning Register	Plans for all new developments that need planning permission are made public by the council. Lewisham upload all plans to the website.

## 17. Report author and contact

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## 18. Comments for and on behalf of the Executive Director for Corporate Resources

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## 19. Comments for and on behalf of the Director of Law, Governance and HR

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