# Raising the Bar:

# Early Community Engagement Guidance for Applicants

November 2024





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# Glossary

**Collaborative design/co-design:** various groups and interests come together as part of a design process that responds to their individual and collective needs and aspirations.

**Consultation:** asking for feedback or opinions on a proposal.

**Communications:** messaging for information sharing purposes, including leaflets, flyers, websites, information boards and reporting about activities.

**Engagement:** umbrella term used to describe many ways of communicating or collaborating with the community or other groups.

**Placemaking:** processes or projects that aim to improve the quality of places in permanent (e.g. design of new housing or public spaces) or temporary ways (e.g. festivals, pop up shops), and lead to places that are inviting, inclusive and bring opportunity to the people who live, work and play there.

**Participatory design:** local people and organisations are actively engaged and invited to participate in a design process being led by a client, such as a local authority or developer.

**Stakeholders:** people, groups or organisations who have a stake or interest in a place. This includes residents, visitors, businesses, workers, community groups.

**Stakeholder mapping:** a process or tool used to identify stakeholders which can be used to create an engagement plan. Consider the level of interest, impact, or influence some groups or individuals may have, as well as proximity to the area.

# 1. Overview

- 1.0.1. The purpose of this document is to set out guidance for applicants to engage with the community on development schemes. The aim is to avoid a tick box approach by ensuring effective engagement and collaboration happens early, is consistent and supports the delivery of high-quality places across Richmond by connecting to the design and decision-making process.
- 1.0.2. This guidance note is for applicants and developers of major schemes
- 1.0.3. (10+ dwellings), ideally prior to Pre-Application discussion. It is not intended to provide a detailed checklist for every scheme. It is intended to outline the Council's expectations and encourage applicants and developers to prioritise a design process that works with, and not against, the community.
- 1.0.4. The guidance builds on the statutory legislation requirements set out in documents including the National Planning Policy Framework (NPPF), Richmond's Adopted Local Plan 2018, Richmond's Design Review Panel guidance, and other relevant Council guidance including Richmond's Culture Richmond 2021 to 2031 Strategy. The guidance also supports achieving the Council's Corporate Plan commitment that all residents have a fair say in decisions that affect them, including a more meaningful approach to engagement and increased decision making.

# 2. What is good quality engagement?

2.0.1. People have the right to be involved in decisions about their places. Good quality, effective and consistent engagement can lead to better design outcomes, ensure shared facilities are needed and will be well used and build buy-in from local people, which can lead to fewer objections and a smoother development process once a scheme comes to site.

Flexible	Consistent	Transparent
There is no 'one' community	Early site and stakeholder mapping	Purpose and objectives for how outputs will be used is
Understand and overcome barriers to participation	Building relationships	clear
		Decision making process is
Mixed methods and approaches	Realistic timelines	communicated
Welcoming and inclusive	Activities are ongoing from an early stage, not bunched	No confusing language
	at milestones	Offers to community are genuine

Fig 1: Key themes – flexible, consistent, transparent

### 2.1. Key principles

- 2.1.1. Early engagement is the difference in approach between engage, deliberate, decide and decide, announce, defend.
- 2.1.2. In general, best practice engagement should:
  - **Start early in the process** (ideally before pre-application stage) and run consistently throughout all phases of a project, not just concentrated around key milestones.
  - **Take time to understand the area and build relationships** with community stakeholders, not just target a small or unrepresentative group.
  - **Be welcoming and inclusive** through accessible language, diverse representation, and support to allow people to participate.
  - **Involve local people in a design process** by connecting activities to outcomes and involving end users from an early stage, rather than seeking to retroactively justify or consult on a developed design.
  - **Support and aim to empower local people** to have influence in their areas, not view engagement as a tick-box exercise.

- Listen to and learn from the community in a two-way process of knowledge sharing, not just a one-way request for feedback.
- **Be genuine and communicate clearly** about the purpose of activities, the impact they will have and how outputs will be used.

# 2.2. Consultation, collaboration or communication?

2.2.1. There are many words used to describe ways of working with the community, often broadly defined as 'engagement'. One key distinction is the amount of decision-making power that is shared through the process. These differences can also be understood through the impact of the activities on the design process – for example, informing people about a scheme or sending a survey has a lower-impact compared with holding a series of design workshops.

	Participation goal	Promise to the public	Example	
Empower	Devolving or taking joint responsibility for decision-making.	We will support you to make decisions and implement what you decide.	A paid community panel with decision- making powers, estate ballots.	
Collaborate or co-create	Working in partnership to help shape outcomes.	We will look to you for advice and guidance to create solutions.	Stakeholder panel or working group, regular co-creation workshops.	
Involve	Ensuring aspirations and concerns are fully understood.	We will make sure your concerns and aspirations are reflected in the proposals.	A programme of design workshops, events and meetings	
Consult	Seeking feedback and views.	We will listen to and take account of your opinions.	Questionnaire or digital survey, drop-in events.	
Inform	Sharing information about the plans or project.	We will keep you informed about our process and help you understand the opportunities and solutions.	General communications including leaflets, flyers, newsletters, website, social media.	

Fig 2: The impact of engagement and collaboration processes on decision making.

# 2.3. Starting early and being consistent

2.3.1. Good quality engagement that builds relationships with the community takes time. Project programmes should not be rushed, or concentrate activities only around key milestones. Activities should be ongoing and connected to design, development, delivery and decision-making.

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Fig 3: Example project progra	mme for a major develo	pment with community facili	ties

	Project stage	Expected outcomes	Engagement impact		
1	Project scoping	<ul> <li>Site mapping of existing facilities &amp; open spaces</li> <li>Mapping routes and movement</li> <li>Data baseline including demographic information</li> <li>Create stakeholder list</li> <li>Begin pre-application discussion with RBC</li> </ul>			
2	Project preparation	<ul> <li>Engagement lead appointed</li> <li>Early engagement strategy developed with RBC</li> <li>Project communication begins</li> <li>Establish community steering group</li> </ul>	Inform		
Pro	oject evaluati	on point: ask for feedback from participants			
3	Early engagement and concept design	Engagement activities that shape concept design Ongoing community steering group meetings Ongoing project communication Attend Design Review Panel Consultation on concept design Ongoing pre-application meetings with RBC	Inform Consult Involve Collaborate		
4	Preparation for planning submission	<ul> <li>Feedback to date incorporated into designs</li> <li>Ongoing community steering group meetings</li> <li>Prepare Design &amp; Access Statement</li> <li>Prepare Statement of Community Involvement</li> <li>Ongoing project communication</li> <li>Ongoing pre-application meetings with RBC</li> </ul>	Inform Consult Involve		
5	Project evaluation point: ask for feedback from participants				
0	Milestone: s	ubmission of planning			
5	Statutory planning consultation	Statutory consultation led by RBC Publication of full planning application pack on Planning Portal Relevant reports and surveys made public Ongoing project communication	Inform Consult Involve		
6	Detailed design & delivery	Ongoing community steering group meetings Ongoing events and workshops Ongoing project communication	Inform Consult Involve Collaborate		
188	Milestone: c	ompletion and handover			

# 3. Who is 'the community?'

- 3.0.1. There is no one 'community'. Each place is made up of a diverse range of individuals, groups, businesses, and service providers who have an interest in a place or will be affected by a scheme or development. Often, they are referred to as stakeholders.
- 3.0.2. As well as landowners, applicants / developers and a Local Authority, stakeholders include the below. Note: this is not a complete list or target, as each site will be unique:
  - Current or future residents, occupants and end users
  - Local business owners and employees
  - Community groups, local amenity societies or voluntary sector organisations
  - Faith groups
  - Sports teams, groups and leisure or activity clubs
  - Users and providers of community facilities such as day centres and youth clubs
  - Users and providers of parks, open spaces and play spaces
  - Users and providers of education, healthcare and other services
  - Users and providers of cultural and heritage venues or amenities such as artists' studios, music venues or historic buildings
  - Local visitors
  - Artists and cultural practitioners
  - Community leaders and organisers
  - Ward councillors
- 3.0.3. Applicants should look beyond the immediate site boundary as part of a detailed stakeholder mapping exercise to understand the area. Level of local interest or influence; proximity to the site; and who will be impacted are some considerations. Applicants should be pro-active about addressing gaps in attendance and not just focus on a small number of groups who are not necessarily representative.

**Scenario 01:** A large site located near a town centre is proposed for redevelopment. An initial meeting will be held to convene a stakeholder panel.

Not recommended	Best practice
A list of well-known established community groups and amenity societies is produced. The area is very diverse, but this is not reflected by the list of attendees.	A mapping exercise of the wider area is completed through several site visits and conversations with local people. Many people who do not have an online presence or are not part of a formal community group are identified and invited to the meeting.

# 3.1. Understanding systematic differences

- 3.1.1. Planning is a complex system that requires managed input from the community and other stakeholders at specific points in the process, for limited windows of time. Building trust through clarity and realistic project timelines is key.
- 3.1.2. Design and development teams, as well as Local Authorities, are paid professionals with decision-making power and oversight of the process. Community stakeholders do not often have this oversight or control of decision making. Often, local people are made aware of development schemes relatively late in the process when key policy is in place and decisions have already been made. Engaging can be challenging, time consuming and feel ineffective, which discourages participation.
- 3.1.3. Good engagement teams should acknowledge this difference and aim to bridge the gap, enabling stakeholders to have their voices heard. An engaged and passionate group of local people are an asset to the design process.

### 3.2. Avoiding the term "hard to reach"

- 3.2.1. This term is outdated and refers to groups of people who are typically underrepresented in public life and are less likely to respond or have the capacity to engage with traditional consultations. Often it refers to people with protected characteristics, those who are from Black, Asian and Other Ethnic Communities, or young people. This term should not be used as it places the responsibility on the community for not engaging, rather than on the professionals who should be working to reach out and provide alternative engagement methods. Instead, be specific about the groups you are referring to. If a generic term is required, 'less frequently heard' or 'seldom heard' is preferable.
- 3.2.2. Applicants should first aim to understand the demographics of the area and complete a comprehensive stakeholder mapping exercise. This includes identifying any potential needs of protected groups and identifying barriers to access, such as requiring information in another language, or time constraints. Applicants should support people to be able to contribute fully by acknowledging and reducing barriers to access.

### 3.3. Working with established groups and organisations

- 3.3.1. There are many local groups in the borough who hold local knowledge and have an in-depth knowledge of the planning process. This includes local charities or special interest groups, amenity societies, trusts or advocacy organisations and service providers. These groups will be identified during the stakeholder mapping phase of creating an engagement strategy.
- 3.3.2. Where requests for information or feedback are sought, make sure to give fair warning and appropriate time to respond; make sure requests are clear; and that adequate context about the scheme and relevant planning policy information is provided. This should not be a one-way relationship make it clear how contributions will be implemented and ensure communication is consistent.

# 4. Developing an engagement strategy

### 4.1. Why create an engagement strategy?

- 4.1.1. Setting out what you want to achieve and how it will be delivered in advance, before key decisions have been made or activities have started is vital. It will help to ensure communication is transparent from the outset. The starting point for any process should be listening and seeking to understand, rather than starting with a proposal or developed design. Engagement activities and project communication should be balanced across a whole project timeline, not bunched around key project milestones.
- 4.1.2. Not everyone will want to take the opportunity to participate in a process some people would prefer to provide feedback at a later stage when the outcome is clearer. Planning and communicating this in advance ensures it is clear for participants how and when they can get involved.

# 4.2. Defining an engagement approach

- 4.2.1. Defining an approach means deciding on the level of decision-making that is appropriate for the project. Here are some considerations:
  - Who might be impacted by the scheme? Consider the wider effects for different groups and audiences.
  - Is it clear who needs to be involved in the design process? Identify the mixed group of 'stakeholders' for the project [see the list in 4.3.1].
  - Where are the opportunities for influence? How will the identified stakeholders help to shape the project. It should be clear how decisions are made and by who. An end-user might expect more collaboration and influence that a general audience who could expect to be informed [see Figure 2].
  - Which activities will provide the required opportunities for influence? Ensure the programme is mixed, tailored to different audiences and makes it clear to participants how their input will be valued and used [see the list in 5.4.1].
  - How will the design or project team be involved in engagement activities? Outcomes should connect to the design process and changes should be clearly communicated to participants. If the project team will be delivering the engagement programme, they should have the necessary skills and experience.
- 4.2.2. Co-design or collaborative design is a process that can provide excellent outcomes that should be aspired to. It requires specialist skills and a full commitment from all project partners and the design team (for example, developers and Local Authorities) to share decision-making and work together openly. This approach may work well for elements of a scheme, such as the design of a community space or public garden. For most schemes, a mixed approach is required as not all methods will be appropriate.

4.2.3. Applicants should be ambitious about the opportunities and transparent about the limitations for engagement. Over-promising and under-delivering raises expectations and creates disappointment. It is best to use accurate language that reflects the opportunities on offer.

Scenario 02: Participants are invited to participate in an engagement process.

Not recommended	Best practice
Participants are invited to participate in a collaborative process to empower them to influence change in their area. Participants are sent a survey and asked for feedback on developed designs. Minor changes are made to the scheme, which participants are informed of once the planning application has been submitted.	Participants are told they will be consulted on plans for the scheme at three milestones. They are told there will be a public meeting share their concerns and that their input will be implemented where possible. Progress is shared throughout the design process, and residents are kept informed about how their feedback has influenced design changes.

# 4.3. Methods and activities

4.3.1. Once an approach has been agreed, there are many kinds of activities that can be used to interest and involve people. We are looking to move beyond 'tick box' methods and encourage applicants to be innovative, build trust, unlock local knowledge and create an exchange of ideas. For example:

#### Keep people informed

There are lots of ways to share project updates and help people visualise proposals. Traditionally this can be done with a project website, flyers, emails and exhibition boards, but forward-thinking approaches are also encouraged. It is important project updates are consistent and timelines are communicated clearly with key decision points for the past and future.

#### Build relationships

Events and activities suited to different audiences are always good to build into a strategy. For example, this could include youth club visits, coffee mornings or activities for parents. Connecting with existing events in the area and maintaining a presence on site is key, particularly for people who are less digitally connected.

#### Use interactive digital methods:

These include digital mapping or interactive surveys, 3D visualisations or collecting and sharing data.

• Meeting ward councillors: Meeting with ward councillors can help to make community connections and share information about the scheme. Note that meetings are subject to the agreement of ward councillors, and they are not obliged to meet and discuss all development proposals. Reasonable notice should be given.

#### • Hold early public meetings:

Public meetings are a good way to begin the conversation and allow the public to ask questions. Meetings should be publicised at least 3 to 4 weeks in advance and held in an appropriate venue or online.

#### • Regularly involve identified stakeholders:

Applicants should commit to involving key stakeholders on a more regular basis, throughout the process. This is most appropriate where individuals or groups will be the end-users of a scheme or have been asked to provide detailed comments.

• **Co-design workshops / targeted workshops at key milestones:** Sessions could be general or focused on a specific part of a scheme, for example, landscaping or play spaces. Good designers should be experienced in collaborating and working with others to build better outcomes through a collaborative process.

#### • Establish a community panel or steering group:

Depending on the project governance, a panel could have decision-making power, be a sounding board or act as a co-client. A managed recruitment process with training and support provided will always be most effective. Groups should be representative of the area and mixed in age, gender and other protected characteristics. For longer-term projects, paying London Living Wage may be appropriate.

#### Thinking outside the box:

There are lots of ways for applicants to explore places and get people involved. Applicants might consider appointing artists or local partners to explore creative approaches or themes like the heritage of the area to make the most of unique parts of the site and bring new audiences.

### 4.4. Understanding barriers to participation

4.4.1. Many people feel shut out of decisions about change in their area, particularly in conversations around housing. Not everyone will want to participate and those that do will approach the process with their own experiences and expectations. The priority should always be to make efforts to understand and overcome barriers to participation and be honest about the scope for change and influence. Some considerations:

#### • Time & location of events

When scheduling events, applicants should be aware of the needs of their target audiences, including access requirements, caring responsibilities and work patterns. Where possible, there should always be a full range of time, location (including online) and date options to allow people to participate. Where an event takes place after school hours, consider running an activity for young people to enable parents/carers to engage without distraction. Try and use a well-known venue within the area where you might attract passers-by, for example a library or leisure centre.

#### • 'Everyone is welcome'

This does not necessarily mean everyone will feel comfortable attending if reasonable adjustments have not been made. Be pro-active to show you have considered access needs is much more effective. Let people know if there step free access, accessible toilets or changing facilities. Are you expecting people to come to you, or are you offering to go to them? Will participants be expected to speak out in front of a large audience, or will there be other ways to participate?

#### Compensation

Depending on the amount of time people are being asked to participate, in some cases it may be appropriate to offer expenses or compensation for attendance. This could take place at an individual level through payment or vouchers, or at a community level, through funding and opportunities.

#### An open-minded approach

Everyone, regardless of their stance on a development project, should be heard and able to contribute to the process. A negative or unsupportive stance does not equal ungenuine or unproductive.

#### Listening and learning

Acknowledging power dynamics and approaching people from a place of understanding is critical. Is everyone in the delivery team showing empathy and understanding? Are open questions being asked as part of the process or does it feel closed off and restrictive.

# 5. Delivery of engagement programmes

5.0.1. The design and delivery team should include skilled facilitators who understand that the goal of an engagement process is not to get unanimous agreement or bow to pressure, but to work towards a shared point understanding that will likely include compromise from all sides.

# 5.1. Building a delivery team

5.1.1. Applicants should ensure teams are balanced and have the necessary skills. Working in partnership with local stakeholders or specialist organisations is supported. When building a team, if the answer to any of the below points is no, consider appointing specialist consultants:

#### Team skills

Does the team have experience of: delivering a high-quality collaborative design processes; project evaluation; visual and digital communication skills; working with diverse communities; workshop facilitation.

#### Timeline

Is the programme realistic? Appropriate time should be given to build relationships, give sufficient notice before events and time to feed engagement outcomes back into the design process.

#### Representation

Is the team representative of the community they seek to work with? How can equality, diversity and inclusion be embedded into the process by sharing opportunities within the community?

#### Inclusion

Does the team have the skills to assess the social, accessibility and health impacts of the proposed scheme?

**Scenario 03:** A secondary school with public facilities is proposed. The applicant does not have in-house engagement skills, so they want to hire a consultant.

Not recommended	Best practice
Engagement consultants have been appointed after key design decisions have been made. The timeline has been condensed to fit the applicant's desired planning submission in 3 months' time. Consultants can only deliver a basic	Participants are told they will be consulted on plans for the scheme at three milestones. They are told there will be a public meeting share their concerns and that their input will be implemented where possible.
programme. Event attendance and survey responses are low, as there is not time to build relationships or give notice.	Progress is shared throughout the design process, and residents are kept informed about how their feedback has influenced design changes.

# 5.2. Planning and publicising events

5.2.1. Provide a mix of event options at different times of day and let people know as soon as possible. Your communications plan should include many different methods to spread the word and inform people of upcoming events.

Scenario 04: A community event has been planned for a mid-sized residential scheme.

Not recommended	Best practice
One drop-in event on a Saturday afternoon is publicised in a letter to all residents with two weeks' notice.	People are asked how and when they would like to take part before anything is proposed.
Attendance is minimal, as many residents work on Saturdays and awareness of the project is low. Several people get in touch afterwards to say that they didn't know the event was happening and are unhappy they couldn't attend.	A mix of in-person and online events are held on different days and times. They are advertised well in advance and shared by word of mouth, posters and WhatsApp groups. Young people are offered a voucher to take part.

# 5.3. Building consensus

- 5.3.1. Involving people in a design process means committing to work with them as collaborators. However, planning and development is a balancing act sometimes decisions will be made that comply with planning policy but are unpopular with the community. This process is not always clear. Transparent communication is important, as well as being realistic about the red lines, constraints and pressures.
- 5.3.2. Compromise is part of a collaboration. This means committing to the process and not making key decisions based on a small number or responses or limited consultation methods. The rationale behind design decisions should be clearly communicated by the design team.

**Scenario 05:** Parts of housing estate has been chosen for infill development. There are concerns around loss of parking and general disruption.

Not recommended	Best practice
Residents were informed about the unpopular scheme. A small group came to the only drop-in event and were frustrated about the loss of parking, which dominated the event. Over half of responses to the estate-wide survey were from people who objected to loss of parking. The car-free part of the scheme was dropped due to pressure.	Residents were informed early about the unpopular scheme. Several meetings are held to listen to resident concerns and explain additional benefits of the scheme. The landscape designer led a co-design process for the community garden and play space. Technical reports were made public, with a summary. Parking permits were introduced to free up spaces on the estate and address resident concerns.

# 5.4. Listening and learning

5.4.1. Most approaches and sometimes project timelines will change over time. Feedback points are important to make sure people are able to contribute. For example:

#### Monitoring

Evaluate throughout the process – be prepared to adapt to show you are listening. For example, 'you said – we did'.

#### • Who is in the room

Monitor attendees to ensure there is a broad and representative group of people present. Adjust communications accordingly and pro-actively seek to fill gaps.

#### • Transparency

Be honest about what is working and what could have gone differently.

#### Communication

Tell people how their input has shaped the process and let people know about delays.

#### Care

Address concerns from local stakeholders without judgement and with empathy.

### 5.5. Communicating effectively

- 5.5.1. Communication, both visual and written, should be clear and accessible. Use plain English and avoid acronyms. Where specific terminology is required, provide explanations.
- 5.5.2. Project messaging should be factual and realistic, but also acknowledge lived experiences. For example, sites for 'development opportunity' may be loved and well-used by the community in ways that are not valued or reflected in planning terminology.

### 5.6. Supporting access

- 5.6.1. Consider the demographics of the area if there is a large community with a first language other than English, translating key planning documents without the public having to request them is essential.
- 5.6.2. Design of any material should consider access needs such as dyslexia. Ensure text is a suitable font and size, avoiding text and background colours with low contrast.
- 5.6.3. Not everyone has access to internet connected devices. A variety of methods for people to get in touch should be provided. A named contact, not a generic email address, should always be provided where possible.

# 6. What we expect from applicants

- 6.0.1. Applicants will need to demonstrate that they have understood the key principles of this document to move beyond a tick-box engagement process. Applicants will need to work with the Council from an early stage to ensure plans for engagement and collaboration is well balanced and leaves appropriate time to connect all outcomes to a design and decision-making process. See Table 1 for our expectations depending on the scale and impact of your project.
- 6.0.2. Note: Officers will use judgement when determining appropriate categories for scale or impact of development. Definitions for engagement impact can be found in paragraph 3.4. Definitions for appropriate actions can be found in paragraph 5.6.
- 6.0.3. Ward Councillor meetings are subject to the agreement of the Ward Councillor. Ward Councillors are not obliged to meet to discuss all development proposals. Meetings will be held at the discretion of Officers and individual Ward Councillors.

<b>Scale or impact of project</b> <i>Note:</i> officers will use judgement when determining appropriate categories	<b>Non-major development</b> Less than 1,000m2 additional floorspace or 10 new dwellings	<b>Non-major development</b> Less than 1,000m2 additional floorspace or 10+ new dwellings	Major development Over 1,000m2 additional floorspace or 10-24 new dwellings	Ma O∖ flo
	<b>To include:</b> Small sites development	<b>To include:</b> Schemes with a significant impact on the wider area Public realm Change of use proposals HMOs	<b>To include:</b> Site allocations Mixed use developments Brownfield developments	To St thi Pa Sc co De Co Pu
Expected impact of engagement process. Note: a mixed approach is required	Inform	Inform / Consult / Involve	Inform / Consult / Involve / Collaborate	In Co
Appropriate actions:				
Keep people informed				
Interactive digital				
Meet Ward Councillors*				
Hold early public meetings				
Regularly involve identified stakeholders				
Design workshops at key milestones				
Establish community panel or steering group				
Local champions/ community connectors				
What we expect from applicants:				
Attend pre-app meetings				
Provide early engagement strategy during pre-app				
Provide stakeholder list/matrix during pre-app				
Attend Design Review Panel				
Share consultation data				
What applicants can expect from us:				
Ongoing monitoring & reporting				
Support tailoring your engagement strategy				

*Note:* Officers will use judgement when determining appropriate categories for scale or impact of development. Definitions for engagement impact can be found in paragraph 3.4. Definitions for appropriate actions can be found in paragraph 5.6.

Ward Councillor meetings are subject to the agreement of the Ward Councillor. Ward Councillors are not obliged to meet to discuss all development proposals. Meetings will be held at the discretion of Officers and individual Ward Councillors.

#### Major development

Over 1,000m2 additional floorspace or 25+ new dwellings

#### To include:

- Strategic projects that meet the threshold for Design Review Panel
- Schemes with an existing
- community of residents
- Developments that feature:
- Community facilities
- Public realm

#### Inform / Consult / Involve / Collaborate Empower

### 6.1. Before the pre-application process

6.1.1. Advice should be sought from the Council and should begin as early as possible before any design proposals are produced to ensure the engagement strategy has been appropriately considered and can be implemented.

### **6.2.** During the pre-application process

- 6.2.1. Applicants will need to:
  - Attend Pre-Application meetings with the Council.
  - Provide an early engagement strategy and stakeholder list for review by the Council during Pre-Application discussions.
  - Report on the progress of activities and show how feedback has been incorporated into the design process.
  - Engage with the Design Review Panel process where appropriate.
  - Share consultation data with the Council in accordance with GDPR.

# 6.3. Creating an engagement strategy

- 6.3.1. Once an approach is agreed, an engagement strategy that is specific to the scheme should be produced and shared with officers during Pre-Application discussion. Note: an engagement strategy template is available in appendix 1. The strategy should identify:
  - The expected impact of the engagement process, indicating what a successful outcome looks like [see paragraph 3.4].
  - The project stakeholders, representative of the demographics of the area [see section 4.2].
  - A programme of activities and events to achieve the engagement impact [see section 5.6].
  - Barriers to participation and the steps that will be taken to enable greater levels of participation [see section 5.7].
  - Who will be delivering the programme and how the outcomes from these activities will connect to the design process [see section 6].
  - How participants can provide feedback about their experiences [see section 6.5].
  - How news about the project will be communicated [see sections 6.6- 6.10].

# 6.4. As part of the Planning Performance Agreement

- 6.4.1. Applicants should ensure they have built a design and delivery team with the necessary experience and skills to deliver on the agreed engagement approach. Where appropriate, this includes appointing specialist consultants, such as inclusive design and collaborative design consultants, to be agreed as part of the Planning Performance Agreement.
- 6.4.2. A site-specific engagement strategy should be produced and agreed as part of the Planning Performance Agreement and discussed during pre-application discussions.
- 6.4.3. Applications will be assessed by Richmond Council and feedback will be provided for a fixed fee, including on the site-specific engagement strategy. Fees / officer rates are set annually by the Council and will be incorporated in Planning Performance Agreements (PPAs) to reflect the officer time required to review and provide feedback on engagement strategies. Time should therefore be allocated in the pre-application process to allow for the engagement strategy to be reviewed.
- 6.4.4. Applicants will also have to provide evidence that they have considered diversity, inclusion, access and social value in any procurement processes or created wider public benefit, for example through the appointment of local people or businesses as part of the strategy.

### 6.5. As part of the Statement of Community Involvement

- 6.5.1. Where an applicant has undertaken engagement activities prior to submitting a planning application, a Statement of Community Involvement (SCI) must be submitted in accordance with our Local Validation Checklist. The SCI should report factually on the engagement approach and outcomes, including:
  - **The engagement approach taken for the scheme** indicating why it was appropriate for the site and how it has been achieved.
  - A summary of activities undertaken including reporting on outcomes and feedback from participants to indicate the approach taken was inclusive and justified. Numerical data about attendees should be included but does not necessarily indicate success. Instead, reporting should be balanced and indepth, focusing on qualitative data to show the impact of activities and how outcomes have led into a design process.
  - **A detailed project timeline** showing when activities were undertaken in connection with relevant project milestones.
  - A full schedule of comments received showing the rationale for where action was taken to amend and address concerns. If no action was taken, the decision not to amend should be similarly justified.
  - **Note:** records of pre-application advice and outcomes from Design Review Panels should not be included in the applicant's Statement of Community Involvement.

### 6.6. Beyond the submission of a planning application

- 6.6.1. As indicated above, it is important that activities continue throughout the duration of the project, after formal submission of a planning application. The principles set out in this guidance should continue to be followed.
- 6.6.2. Planning applications for the approval of Reserved Matters following Outline approval, which are common for larger master planning schemes or urban regeneration projects, should be submitted with an up-to-date Statement of Community Involvement, outlining engagement undertaken since Outline approval. Conditions that require discharge, for example a landscape strategy, should also be informed by engagement work done to date and further engagement if necessary.
- 6.6.3. Applicants should be transparent as to what point in the planning application process stakeholders can engage with specific aspects of a development proposal to avoid stakeholders being told it is 'too early' or 'too late' to provide input and should use the submission of subsequent Reserved Matters or Condition Discharge application(s) as an opportunity for meaningful ongoing engagement.

# 7. Monitoring and accountability

- 7.0.1. The outcome and impact of engagement activities for major schemes will be reported as part of the Council's Planning Applications Committee process and in Design and Access Statements. Outcomes will also be monitored and reported as part of Section 106 agreements, as appropriate.
- 7.0.2. As part of the Council's internal information and monitoring processes, data will be recorded about engagement activities for major schemes.
- 7.0.3. Data about engagement for major schemes will also be recorded as part of the Council's internal information and monitoring processes. This Guidance will be monitored and reviewed as needed to ensure it is effective and is responding to local expectations.

# 8. Policy context

- 8.0.1. Underpinned by a clear direction in the Local Plan; The London Plan; the National Planning Policy Framework (NPPF) is a clear mandate to prioritise a collaborative approach that centres placemaking, design-quality and local knowledge.
  - 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).

# 8. References and further reading

Resources relevant to the London Borough of Richmond:

- **DataRich**, a free and open source website to access local data from nationally recognised sources: <u>link to website</u>
- Cost of Living Community Centre Directory: <u>link to Richmond Council</u> website
- Find a school in the borough: link to Richmond Council website
- Find a youth club in the borough: link to Achieving for Children website

Supporting good quality engagement and co-design:

- Stage of Works Engagement Overlay, RIBA (Royal Institute of British Architects), 2024: <u>available as a PDF download</u>
- Making the Case for Co-Production, Future of London, 2024: <u>available as a</u> <u>PDF download</u>
- Commissioning Co-Design Process Note, Greater London Authority, 2023: <u>available as a PDF download</u>
- Voice Opportunity Power youth engagement toolkit, Grovesnor, 2021: link to website
- The Glass-House Community Led Design Resources: link to website
- **Pre-application Ten Commitments for Effective Engagement**, London Government Association, 2020: <u>link to website</u>

For more information write to: **Spatial Planning and Design, Chief Executive, Civic Centre, 44 York Street, Twickenham TW1 3BZ** 

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