

## **GCPH response to Effective community engagement in local development planning guidance: consultation**



*GCPH welcomes this consultation on community engagement guidance for local development planning. We are broadly supportive of the guidance and what it is trying to achieve. In our response, however, we suggest some aspects that we feel could be strengthened.*

*Before providing our detailed answers to a number of the questions posed in this consultation, we wish to draw attention to the wider policy context relating to planning and community engagement.*

### **Wider planning contexts**

Key points that we made in our [consultation response<sup>1</sup>](#) to the National Planning Framework 4 (NPF4) draft consultation remain relevant and we highlight and restate them here:

*‘The places where people live and grow up, the environmental factors that they are exposed to, and the control they have over these exert strong influences on their health and wellbeing. These determinants are socially patterned and exhibit significant inequalities. The recent pandemic and control measures have intensified the impact of these influences and exerted additional, and not yet fully quantified, pressures particularly on the communities who are the most marginalised due to increasing health inequalities. Over the course of the pandemic, the importance of safe homes, liveable local neighbourhoods and high-quality greenspaces and infrastructure came to the fore and highlighted how the social patterning of these environments added to the burden of ill health in the most deprived parts of Scotland. As Scotland recovers, the importance of the places where people live must remain central: good quality built and natural environments, secure and affordable housing, clean air, public and active transport infrastructure, places and spaces for regular physical activity, nutritious, affordable food, safe play, cultural opportunities, social connections and participation in the local community are all vitally important for health. Further, the hosting of COP26 has increased the spotlight on Scotland to demonstrate a legacy and further its commitment to a just transition to achieve net zero as the climate and nature emergencies reach a critical point.’*

### **Question 1 – Do you agree that the purpose and scope of the guidance is clear?**

Yes – we agree it is clear, but we think that it could be further strengthened through the addition of specific resources available to communities. We note that section 2.2

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<sup>1</sup> Glasgow Centre for Population Health. [GCPH Response - Fourth National Planning \(NP4\) Framework draft consultation](#). Date of submission: 31st March 2022.

of the guidance includes the [Our Place](#) website as a source of support for communities when producing a Local Place Plan to inform a planning authority's local development plans. The Our Place hyperlink in the guidance takes people to the website's homepage and it is not immediately obvious how to navigate to its very useful resources on Local Place Plans. A good deal of scrolling – particularly on a mobile phone or tablet – is required to access the Local Place Plans section of this website. We are concerned that when communities do have the resources to consult online materials, that they have easy access. We recommend that either a specific link is given – for example [www.ourplace.scot/home/local-place-plans](http://www.ourplace.scot/home/local-place-plans) – or that support is given to strengthen the navigation of Our Place to make this resource more accessible. We also strongly recommend that this guidance is available in accessible formats (plain text version, accessible PDF, audio, braille, BSL or large print) and in community languages. Further, we suggest that printed versions of this guidance are made available in planning authority and public buildings, such as libraries, so that digitally excluded individuals and communities have access to this guidance. Adding to or amending these types of resources would, we think, strengthen the ability of guidance to support planning authorities in their duty under the Planning (Scotland) Act 2019 to provide communities with information about the assistance available to them to prepare Local Place Plans.

In our experience, effective community engagement requires a range of communication methods. For example, our [Common Health Assets](#)<sup>2</sup> project, in partnership with Glasgow Caledonian University, has taken into account digital exclusionary factors and offers flexibility in communication methods to suit participant needs. The methods utilised support positive relationships to be fostered between participants and a stronger connection to the wider project, which provides a good foundation for meaningful engagement.

We broadly welcome the seven underlying principles to the guidance that are set out in '[Background to the Consultation](#)'. We especially welcome that the National Standards for Community Engagement (NSfCE) form the basis of the guidance because they have been developed with public sector, third sector and community groups across Scotland. These standards therefore reflect, we think, the good practices that are necessary and relevant to effective engagement between communities and planning authorities. We think it would be useful to further emphasise the underlying principle that communities have the right to engage, and to be engaged on, public service authority decisions. This is a broad legal right enshrined in the Community Empowerment (Scotland) Act 2015. We recommend that this rights-based entitlement to engagement with public service authorities is made clearer because it is a relevant context for planning authorities to take into account when developing new plans.

The Common Health Assets Lived Experience Panel is being evaluated in relation to the NSfCE – both at baseline in relation to recruitment and early delivery and at the [half way point](#). This example demonstrates how the NSfCE can be used in a very practical way to guide and assess engagement approaches.

Furthermore, we also recommend that the seven underlying principles emphasise that effective engagement, as outlined in the NSfCE, can be key in ensuring participation from marginalised communities and people with protected

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<sup>2</sup> Ahmed M, McLean J. [Common Health Assets: Lived Experience Panel Baseline Evaluation report](#). Publication date: January 2023.

characteristics – meaning better plans and better outcomes for communities. Such a principle would chime with the stated outcomes in provision 2 of the Planning (Scotland) Act 2019, which provides the framework Local Development Plans.

Table S2 in the consultation paper very usefully lists the planning reform policies that contain community engagement guidance. We recommend that consideration is given to including the wider policies that planning authorities are likely to need to consult. For example, we recommend that Parts 1, 3 and 5 of the Community Empowerment (Scotland) Act 2015 are included since we note that planning authorities must, according to the [Local Development Plan guidance](#)<sup>3</sup>, consult any local outcomes improvement plans drawn up under this piece of legislation.

We think that it is important that communities can easily find out their statutory rights and support that they can expect when engaging with public services. As such, we welcome the inclusion of the Our Place website in this consultation paper. We also note that Communities Channel Scotland, developed by Scottish Community Development Centre (SCDC), with funding from the Scottish Government, has a useful [policy low-down for community empowerment and local services and planning](#) while the Community Ownership Support Service also publish a useful [community section](#) on relevant policies for community groups, including Local Place Plans and other relevant legislation. We therefore recommend that the Scottish Government continue to support, enhance, and maintain these websites, where possible specifically stating the community engagement rights and support that communities stand to expect with planning authorities. Further, we note that in addition to planning, there are now a number of national policies and associated regulations and guidance<sup>4</sup> that have a bearing on community engagement duties for public service authorities and on the rights and support that communities can expect. While outside the scope of this consultation, we also recommend that consideration is given in the longer term to developing and publishing a resource with communities for them to consult about the community engagement duties, rights, and guidance across any national policy, especially since these policies have a broad aim of building a fairer nation and securing community participation in policy development and delivery.

In response to the Place Principle underlying this guidance, we note that evidence reported by disabled people's organisations reveals that when a population group is a minority in a physical place, a place-based approach may put them at a [disadvantage compared to other local people due to their low numbers and potential low local influence](#)<sup>5</sup>. Since the three overarching Local Development Plan aims in the [Local Development Planning Guidance](#) includes being '*people-centred*', we therefore welcome the approach in the guidance that it is essential to supporting minority population groups and people with protected characteristics to express their views.

Further, we welcome the recognition in this guidance of discriminatory factors against some population groups during community engagement processes, including women, minority ethnic groups, young people, old people, and disabled people. We

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<sup>3</sup> Scottish Government. [Local development planning guidance](#). Publication date: 24 May 2023.

<sup>4</sup> Examples of such national policies which set out community engagement duties, rights and guidance include: Community Justice Outcomes Improvement Plans under the Community Justice (Scotland) Act 2016; parts 2, 3 and 5 of the Community Empowerment (Scotland) Act 2015; Requirements for Community Learning and Development (Scotland) Regulations 2013; the Equality Act 2010 and the Fairer Scotland Duty statutory guidance.

<sup>5</sup> Lightbody R. [Hard to reach' or 'easy to ignore'? Promoting equality in community engagement](#). Edinburgh: What Works Scotland; 2017.

note that such groups can collectively make up a significant cohort at a regional or city level. For example, the available evidence across our [Understanding Glasgow neighbourhood profiles](#)<sup>6</sup> tell us that in Glasgow, young people aged 0-24, minority ethnic groups, old people aged 65+ and people who report being disabled collectively make up approximately 79.2% of the city's population. We recommend that the guidance emphasises the [Inclusion standard in the NSfCE](#), encouraging planning authorities to identify who needs to be included and supported when designing their community engagement processes. We also recommend taking an intersectional approach, by which we mean, identifying and tackling complex, multiple forms of disadvantage and discrimination affecting people who identify with a number of protected characteristics. Taking an intersectional approach could, we think, open the door to more '*nuanced, inclusive and realistic*'<sup>7</sup> understandings of how planning processes and decisions impact on people's lives. Glasgow City Council outlined why an intersectional approach is important as a public service authority:

*'The experience of inequality and its impact on life experience is complex. Some people may fit within a protected characteristic but may not define themselves that way. Similarly, other people may define themselves by more than one protected characteristic and experience multiple inequalities and discrimination. It is important that protected characteristics are not only each viewed separately but the connections and their collective impact are considered.'*<sup>8</sup>

As an example of how intersectionality has been considered in planning contexts, Williams et al. developed a two-phased intersectional framework<sup>9</sup>. We recommend that further research is undertaken about intersectional approaches to planning, and we suggest that the Scottish Government support planning authorities to develop and to test such approaches for local development plans.

We note the term in paragraph nine '*It is recognised that some people can find it more challenging to engage with planning*'. We disagree with this statement. We think a more accurate evidence-based statement would be to say that [planning processes are often not designed in ways that engage with certain population groups](#)<sup>10</sup>. While we support the aim of planning reform to improve community participation, we think that it could also include some of the statements in the report and the review commissioned by the Scottish Government acknowledging a need for planning to comprise of '*more collaboration and less conflict*'<sup>11 12</sup> with communities. Including such acknowledgement, alongside the important aims in this guidance,

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<sup>6</sup> Glasgow Centre for Population Health. [Understanding Glasgow Profiles](#). Accessed 31 August 2023.

<sup>7</sup> Yaqoob T. [Taking an intersectional approach](#). Scottish Government: Edinburgh; 2020. Accessed 26 November 2020.

<sup>8</sup> Glasgow City Council. [Equality Outcomes 2017-2021](#). Accessed 12 September 2023.

<sup>9</sup> Williams P.C, Binet A, Alhasan D.M., Riley N.M. & Jackson C.L. [Urban Planning for Health Equity Must Employ an Intersectionality Framework](#), Journal of the American Planning Association 2023; 89(2):167-174.

<sup>10</sup> Matthews P, Netto G, Besemer K. '[Hard-to-Reach](#)' or '[Easy-to-Ignore](#)'? A rapid review of place-based policies and equality. University of Stirling: Stirling; 2012.

<sup>11</sup> yellow book ltd. [Barriers to community engagement in planning: a research study](#). Scottish Government: Edinburgh; 2017.

<sup>12</sup> Beveridge C, Biberbach P, Hamilton J. [Empowering planning to deliver great places](#). Scottish Government: Edinburgh; 2016.

could be a step in the complex task of improving trust and relationships between communities and planning authorities.

We welcome the adoption of the same definition of community outlined in the National Planning Framework 4 as '*A body of people*' that can be based on a common factor, for example place, identity, or interest.

We welcome that the guidance states that it is essential that people with protected characteristics (including disability, race, age, sex, and sexual orientation) as well as people from a range of socio-economic backgrounds are included in development planning. However, we think the guidance could go further to suggest that at different stages of the planning process, planning authorities are able to evidence that they have engaged with people across each of the protected characteristics and people living in socio-economically deprived areas. More widely, we agree that community engagement processes should be designed to ensure that engagement reflects the range of people that it serves. For example, where appropriate, engagement with organisations that represent a specific population group may be necessary to better understand the barriers and facilitators to engagement.

For accessibility reasons, we recommend including a visual diagram or timeline of when people can engage in the local development plan process.

The consultation paper includes the NPF4 aim of a fair and inclusive system, that '*Opportunities for engagement in development planning should be early, collaborative, meaningful and proportionate*'. We recommend reviewing Bynner and Faulker's handbook [How to design and plan public engagement processes](#)<sup>13</sup> as it details critical strategic stages that would help planning authorities plan engagement processes effectively so that they can work to this aim, in conjunction with the NSfCE, from the outset.

We recommend that consideration is given to any potential overlap with the Requirements for Community Learning and Development (Scotland) Regulations 2013, particularly the [guidance for Local Authorities](#)<sup>14</sup>. There is potentially useful learning that planning authorities and the CLD practices of Community Planning Partnerships can share with each other about effective engagement practices.

## **Question 2 – Do you agree that the terms inform, consult, involve, collaborate and empower, as described in the table, are helpful terms to support understanding of different levels of engagement and the influence that results from it?**

Yes, we broadly think that it is helpful to set out different levels of engagement. We recommend that it is also important for planning authorities to be clear with communities about what they are trying to achieve and what communities stand to gain. For example, in a planning stage that has the aim of informing communities but not necessarily empowering them, this ought to be clear.

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<sup>13</sup> Faulkner W, Bynner C. [How to design and plan public engagement processes: a handbook](#). Glasgow: What Works Scotland; 2020.

<sup>14</sup> Scottish Government. [Community learning and development plans: guidance - 2021 to 2024](#). Publication date: 7 December 2020.

We note that the International Association for Public Engagement Participation's (IAP2) Spectrum of Public Participation underpins this guidance in conjunction with the NSfCE. We have observed that this spectrum is being increasingly referenced by Public Service Authorities in Glasgow. We also referenced it, with permission, as a resource in an [online introductory community engagement course](#)<sup>15</sup> that we developed with the University of Glasgow. However, for transparency and to enable the guidance to be most usefully applied, we think that it would be useful if the Scottish Government could be more specific about its reasons for using the IAP2 Spectrum to underpin its guidance, and to provide more detail about its distinction between it and the NSfCE. For example, at GCPH we see the NSfCE as the nationally recognised, good practice principles for community engagement in Scotland and the IAP2 as the '*what*' that can be delivered depending on the aims and purpose of that engagement.

When reflecting on the empowerment level of the IAP2 Spectrum for the context of planning, we agree that the empowerment level succinctly explains some key actions to take, such as making final decisions or implementing a local decision. However, we think that this definition of empowerment falls short of what is required in practice. We recommend that this empowerment level also includes examples of outcomes that might be anticipated as a result of taking such actions.

In the evidence base for community engagement in regeneration contexts that we developed during the [GoWell research and learning programme](#), we defined community empowerment as the "[capacity to make effective choices, and then to transform these choices into desired outcomes and actions](#)"<sup>16</sup>. GoWell developed a model that illustrates community empowerment as [a change that arises from a combination of: at least one of three types of actions, and one of three types of outcomes](#)<sup>17</sup>. The three actions in GoWell's evidence-based model of community empowerment are:

1. Building on capability to make or influence positive change.
2. Making and influencing decisions.
3. Achieving and influencing action.

The three community empowerment outcomes in GoWell's model of community empowerment are:

1. Practical: changing things in a desired direction.
2. Political: being more in control.
3. Psychological: feeling more in control.

The [GoWell briefing paper](#)<sup>17</sup> and associated [learning snapshots](#)<sup>18</sup> about applying this model of community empowerment describes the kinds of planning and resources required to achieve community empowerment.

Moreover, our peer research work undertaken as part of the [Exploring Neighbourhood Change](#) project demonstrated that a failure to meaningfully engage

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<sup>15</sup> University of Glasgow and Glasgow Centre for Population Health. [Community Engagement: an exploration](#). Accessed 31 August 2023.

<sup>16</sup> GoWell. Briefing Paper 13: [Community empowerment in transformational regeneration and local housing management in Glasgow](#). GoWell: Glasgow; 2011.

<sup>17</sup> GoWell. [Briefing Paper 32: The GoWell Panel](#). GoWell: Glasgow; 2021.

<sup>18</sup> GoWell. [Learning snapshots](#). Accessed 31 August 2023.

with the communities affected by planning decisions has significant scope to cause detriment to communities' and individuals' sense of control, wellbeing, and to negatively impact upon the wider determinants of health that are of greatest relevance to them. Specifically, the research showed that residents need to have a level of control over both the types of change that take place in their neighbourhoods and the pace of that change.

As a result of this evidence, we think that it is important for the guidance to emphasise that when a planning authority sets out to empower communities, that this is likely to be achieved through a combination of actions and outcomes. Emphasising this point would strengthen the potential of the guidance to be applied in ways that meet the NSfCE in *'taking joint action to achieve positive change'*.

Further, with these points in mind, we recommend that empowerment is extended beyond the evidence gathering stage to cut across the Plan Preparation and Delivery stages. Specifically, we recommend that planning authorities demonstrate how they are taking communities' Local Place Plans into account in planning and delivering Local Development Plans.

We would recommend linking the guidance to examples of effective use of these different levels of engagement in planning processes, drawing on examples across Scotland and/or providing links to examples on the Our Place website.

## **Further Consultation Questions**

### **Question 5 – Overall, is the approach set out in the guidance helpful?**

Yes, alongside our above points.

### **Question 9 - Please provide any further comments on the guidance set out in this consultation.**

Effective and meaningful community engagement is dependent on the skills, time, and resources of planning authorities to carry out their duties. While we welcome the approach in this guidance, it is not clear from this document that planners will be able to achieve this level of comprehensive and targeted engagement within their current means. Due to significant financial cuts, many neighbourhoods have fewer planners to support their activities than they did previously<sup>19</sup>. It would be helpful to understand how the Scottish Government will support planning authorities by growing the workforce, ensuring that useful CPD opportunities are made available to them, and that meaningful engagement is prioritised with a time commitment to develop and maintain the skills required.

We welcome the inclusion of different levels of engagement to guide planning authorities about what types of engagement with communities can be achieved and to what end. We also welcome the inclusion of the NSfCE as they emphasise the

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<sup>19</sup> RTPi Scotland. Resourcing the Planning Service: Key trends and findings 2022. Edinburgh: RTPi Scotland; 2022.

need for action arising from community engagement processes and understanding the impact that this has. History tells us that involving population groups that have not been sufficiently involved in decision-making is important but not sufficient as a sole method. As an example, we know that in the past, cities have typically been designed by men to meet the needs of men<sup>20</sup>. They tend to reflect traditional gender roles and gendered divisions of labour. For example, transport networks are often developed around a hub and spoke model, which has generally met the employment needs of men. We can conclude from such an example that understanding how past planning decisions have affected certain population groups, alongside community engagement with present-day communities, would be crucial to being able to plan for more inclusive places in the future.

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<sup>20</sup> The World Bank. [Handbook for Gender-Inclusive Urban Planning and Design](#). Accessed 31 August 2023.