

## Written evidence submitted by Commonplace [FPS 136]

### About Commonplace

Commonplace is a digital platform that connects people to the places they live, work or play to accelerate positive change. Through our online tools, we connect decision makers in the built environment with real time information generated through engagement and consultation with the public over changes being made to their neighbourhoods. Commonplace has been used by over two million people across more than 750 projects including 25 local and neighbourhood plans. We have worked with over 200 customers in local government, private development, social housing and infrastructure.

Our approach to transparent, accessible engagement demonstrates the potential of digital: 65% of respondents to plans through Commonplace express positivity towards growth and change. We also reach an under-represented audience in planning: 70% of our users are also under the age of 45.

### Summary

We recognise that the Committee begin their inquiry at a time when the Government are concluding consultation on the Planning for the Future White Paper. Our response to the Select Committee call for evidence will focus on the inquiry's fifth question on the issue of public engagement within the planning system. However in summary, we set out our main observations on the Committee's questions of inquiry overall below:

- We would welcome a move to a more rules-based planning system that is digitally-powered, accessible and supports meaningful community engagement.
- Evidence from our 750 projects demonstrates that accessible and transparent engagement is the only way to deliver democratic accountability and increased trust. Digital tools are an effective way to achieve this: two million people have engaged via Commonplace; 89% of respondents want to hear about other local projects they can influence; and over half of them feel more connected to their neighbourhood simply by contributing to an engagement.
- Engagement in Local Plan making will only be broad, democratically accountable and useful in shaping plans if communities can make a clear connection between the strategic and the local, with clear feedback loops to demonstrate listening and action taken to achieve specific outcomes.
- This will mean engaging actively from the very beginning of, and throughout the Local Plan making process, rather than starting at stage 3 when the draft is already complete. Our experience in places like Lewisham shows that creating a Statement of Community Need can be a formative foundation for a new plan.
- Research commissioned, and soon to be published by Commonplace demonstrates that there are potential unintended consequences to automatic approval of development

schemes without community approval. Dramatically reduced community engagement would undermine democratic accountability; increase distrust and discontent, and ultimately introduce greater friction into the system.

- This risk can be mitigated by requiring ongoing engagement as part of the development management process, irrespective of which category an application falls under. Furthermore, given the proven ability of digital tools to achieve reach and increase diversity or response, we recommend that digital engagement be a requirement for Local Plan making and development management processes.

## **5. What is the best approach to ensure public engagement in the planning system? What role should modern technology and data play in this?**

### **Introduction**

Commonplace is a digital platform that connects people to the places they live, work or play to accelerate positive change. Through our online tools, we connect decision makers in the built environment with real time information generated through engagement and consultation with the public over changes being made to their neighbourhoods.

We work to collect vital feedback from people to help shape and influence decision making. We achieve this through building shared understanding of community priorities, reaching broad and diverse audiences and engaging them in more inclusive decision making.

Our platform reaches into new audiences to empower them with information and understanding of planning and the built environment. 65% of users who engage with plans through Commonplace express positivity towards growth and change. And we reach an under-represented audience in planning: 70% of our users are also under the age of 45.

We have worked across more than 750 projects for over 200 customers in local government, private development, social housing and infrastructure. As well as plan-making such as Local Plans, these projects include transport planning, housing development, regeneration, energy, and pre-application engagement for private sector planning applications. In total over two million people have engaged with planning projects using Commonplace, greatly increasing and broadening citizens' engagement with the evolution of the places they care about.

### **Best Approach for Digital Engagement**

Commonplace is a digital platform for engagement, which is part of the overall package of tools for great engagement. Our experience suggests that digital engagement facilitates the widest reach and engagement and the materials created for digital engagement can serve other more traditional channels, as well. These traditional channels - face-to-face meetings and exhibitions; paper surveys; and phone calls - all remain vital for achieving wide inclusion. The benefit of a digital-first approach is that it reaches wide and also enables real-time identification of those not reached - so resources can be directed effectively to bring in those who might be excluded.

The channels used are one vital part of the engagement equation. The other parts are: what

is being engaged about; and over what time periods. The white paper's proposals are clear as to how citizens can engage with Local Plans more easily, but less clear as to how an ongoing process of engagement in detailed planning proposals will be provided. Without this clarity there is a risk of disengagement in Local Plan making, which can often be focused on larger more strategic geographies and themes that mean less to people because of their scale.

Commonplace's approach to engagement rests on the following principles:

**Ongoing engagement:** we believe that by engaging those impacted by change into a dialogue with decision makers and developers, better plans can be made and implemented. By engaging the public throughout the planning process, from creating Local Plans to individual planning applications, the public can better understand the impact of change on their communities and be empowered to help shape it for the better. In polling conducted by Public First on our behalf to support our response to the white paper, an overwhelming majority of the public expressed desire to receive regular updates on planning matters in their areas.

**Transparency:** we ensure that conversations about change in the built environment help generate a shared understanding through social proof. Comments left on Commonplace are open for others to read and agree with, or prompt other thoughts and opinions which can be easily shared. This enables us to help shift conversations about change from combative to collaborative. The need for transparency was highlighted by the recent Grosvenor report into levels of public trust in the ability of developers and councils to secure their interests through the planning process. Our own research suggests that all actors within the planning process are generally viewed as distrusted.

**Accessibility:** we support our customers in translating complex proposals and policies into user friendly, understandable visually appealing engagements. By creating engagements that provide information openly, allow for public feedback where changes to proposals can be tracked easily, we foster greater levels of trust that the public are being listened to and their opinions acted upon.

Commonplace maximises reach and response by combining existing trusted channels such as local community groups; the existing Commonplace community in an area, which can be tens of thousands of people; and paid social media. The data we collect highlights gaps in demographic reach which our customers can fill by targeted digital or analogue engagement.

Whilst we believe that planning engagement should be digital first, the most valuable community engagement will be that which integrates digital and non-digital channels seamlessly in order to achieve maximum reach and response. Demographic data from digital engagement can also be used to identify missing groups and then target them to fill the gaps.

## Common Understanding of Place

Through community conversations, Commonplace collects thoughts and views from the public, translating them into easily understood data. This enables developers and decision makers to better understand community priorities and calibrate and justify the decisions that they make

in shaping the built environment.

We have worked with local authorities to help them shape their Community Infrastructure Levy priorities, and with developers to understand what amenity and mitigations are important to communities where they suggest plans.

Over time across multiple projects, we are able to support communities generating a collective understanding of local needs and aspirations.

In 2019, Commonplace released its report “Where are the Young People?” which explored the role of young people in the planning process. After analysing data generated from young people under 35 across multiple projects, we were able to identify key themes that members of this age group cared most about, which included: a better experience of shopping on their local high streets; better maintenance of public spaces in their area; safer roads; better children’s play facilities; and a higher standard of design for new buildings.

With an accelerating number of projects across the country, Commonplace is increasingly able to deliver similar analysis of local geographies, across diverse groups of people, making community sentiment and “top priorities” easily understood both by public authorities and developers making proposals.

### **Meaningful Engagement & Generating Consent for Change**

We are cautious of changes to the planning system that would result in less opportunity for community engagement on detailed plans. We fear that this may undermine trust further and lead to greater opposition to approved schemes, causing delay and community friction. They would also risk reducing the democratic accountability of the process.

In order to ensure greater certainty and speed in decision making without disenfranchising those closely impacted by proposals, there must be a counterbalance with greater clarity and concrete mechanisms for the public to have influence on decisions that change the built environment in their neighborhood. **Commonplace has demonstrated over 750 projects and growing that meaningful engagement can lead to consent for change where previously there was vocal opposition.** By gathering and analysing sentiment from communities toward development, both developers and planning authorities are able to secure objective data to inform decision making from vastly more representative samples.

There are potentially counterproductive consequences of reducing the extent and depth of engagement the public currently enjoys within the planning process. The proposed reforms need to offer greater clarity on who and how decisions for planning consent will be exercised. Whilst consent within the planning process may now be secured on a discretionary basis, any assessment of an application supported by design guides will still require an assessment of conformity to the adopted plan.

If the public are not meaningfully engaged in that assessment, there is potential for increased friction between those impacted by change and the responsible decision makers. Rather than expediting planning applications, the reforms risk greater exposure to legal interventions and judicial review, when communities feel assessment processes have not been followed or simply disagree with the outcomes.

Commonplace has demonstrated that deploying digital technology in community engagement can act as a meaningful and deliberative mechanism for the public to understand, contribute to and influence proposals that come forward. Where ongoing, transparent and open engagement takes place, our evidence demonstrates that communities are willing to support plans and proposals.

### **Public Engagement in Local Plan Making**

We welcome the greater focus on accessible, map based and visual spatial plans. Commonplace has worked with a considerable number of local authorities to express geospatial plans onto our popular Community Heatmap, enabling residents to provide live feedback on plans and policies.

From working on over 750 projects, our engagements demonstrate a trend for greater input into smaller, human scale projects in which the public are able to better comprehend the impacts of change in localised areas. Large scale engagements that attempt to engage the public in macro conversations about policies that do not have a clear geographic anchor in local neighbourhoods are less successful in obtaining high levels of engagement. We have supported 16 neighbourhood plans, whilst our corporate licence local authority customers will regularly scale their engagements into smaller geographical areas, such as neighborhood, town or electoral ward.

Continuous ongoing engagement is also a key element of success in restoring trust and confidence in plans and proposals reflecting public interests. This is reflected in successful engagements that seek initial views and opinions ahead of presenting initial plans and proposals. We have good experience of this having delivered excellent outcomes for councils, for example with Lewisham Council in Catford, where a formative community conversation took place on Commonplace over 12 months before policy or design work commenced. The public's input through Commonplace formed part of the brief for prospective master planning teams.

Proposals to commence statutory engagement only at stage 3 of the plan-making process, once a full draft of the Local Plan is completed, risks missing opportunities for communities to engage in formative plan making and developing a sense of shared local identity. It risks creating greater resistance later in the process. We suggest creating a 'Statement of Community Needs' that is derived from an early, broad community conversation, which becomes a key input and baseline for the Local Plan in addition to other inputs.

### **Public Engagement in Development Management**

Any proposals for change to development management processes should help secure greater consistency and standards on key elements such as data, transparency and engagement.

In our experience, differing planning authority approaches to development management can create high levels of variation and complexity for applicants and the public. There is a high degree of variation, for example, in the extent to which planning authority Statements of Community Involvement set expectations for both digital and non-digital engagement.

With the market for digital planning tools such as Commonplace having rapidly expanded in recent years, many planning authority Statements of Community Involvement are significantly

outdated. Whilst a growing number of planning authorities have embraced new tools and platforms to assist in plan making and development management, this is currently limited. Expanding digital literacy in planning authorities can ensure greater levels of engagement in decision making. We believe that local authorities will welcome greater clarity on the acceptability of digital engagement in planning processes. We believe that local authorities will welcome greater clarity on the acceptability of digital engagement in planning processes.

Digital platforms are readily available and proven to be effective in helping unlock consent for change as well as diffusing combative disagreement. Given this is the case, it would be both viable and beneficial as part of new streamlined development management policies, to encourage or require developers to produce a Statement of Community Involvement for every proposed development.

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### **Data Standards**

Commonplace's purpose is to support plans and proposals being open, accessible and transparent. We believe that Local Plans have much scope to improve and move toward more simple, map based, and generally more visual expressions of how areas can change for the better. In order to achieve this, we support greater efforts to secure standardised, machine readable data. This is not just maps but also digital imaging.

Our Community Heatmap module is a popular method of expressing spatial plans, whilst also encouraging active geospatial feedback. We have also found through our experience of over 750 projects a correlation between smaller, neighbourhood based plans and higher levels of engagement. The more strategic, complex or large scale a plan or policy proposal becomes, the lower the likelihood of useful feedback for those seeking community views.

By way of example, about 10% of Commonplace engagements are large-scale strategic plans; 90% are neighbourhood or ward-scale engagements including development management, neighbourhood plans and transport orders. A key challenge in achieving good community engagement in planning is in making the link between neighbourhood and strategic level conversations. This is something that digital engagement can facilitate well, and needs to happen as an ongoing dialogue throughout the planning process.

We are strong advocates for the need to communicate information, particularly in relation to complex planning policy or development management plans, in clear and transparent ways. Higher standards for plain English, illustrative and exemplified plans and proposals should be in place to ensure standards and approaches within planning authorities are consistent.

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