Getting involved in plan-making: Participation and stakeholder involvement in local and regional spatial strategies in England

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Abstract

In 2004, the English planning system was subject to extensive reforms which introduced a 'spatial planning' approach that goes beyond traditional land use planning in integrating policies for the development and use of land with other policies and programmes which influence the nature of places (ODPM, 2005). At the regional level, Regional Planning Guidance (RPG) was replaced by Regional Spatial Strategies (RSS) and, at the local level, existing local land-use planning documents were replaced with a portfolio of documents that make up the new Local Development Framework (LDF). Together, the LDF and RSS make up the statutory development plan for an area. At the heart of the new spatial planning reforms is a heightened emphasis on stakeholder and community involvement. This paper brings together research at two different spatial scales. The 'Spatial Plans in Practice' Study examined stakeholder involvement in LDF preparation across England. Parallel research examined the experience of stakeholders in the formation of the North West RSS. Drawing on this empirical base, the paper examines experiences of stakeholder involvement in the reformed spatial planning system and discusses the implications for the future.

Introduction

The publication of the Planning Green Paper: *Planning: Delivering a Fundamental Change* (DTLR, 2001) began a process of comprehensive reform of the UK planning system which culminated in the Planning and Compulsory Purchase Act (PCPA) 2004. The justification for this change was that the land-use planning system was complex, remote, hard to understand, difficult to engage with, slow and unpredictable and, generally, 'not customer friendly' (DTLR, 2001: 2.2-2.7). A fundamental component of the reformed planning system is the emphasis placed on enhancing stakeholder involvement in the plan-making process, and on enhancing linkages with the parallel development of Community Strategies, which lie at the heart of the new Local Development Frameworks (LDF) and Regional Spatial Strategies (RSS).

The concept of stakeholder involvement is not new. Engaging stakeholders, including the public, in the planning process can be traced back to at least the late 1960s (Skeffington, 1969). Since then stakeholder and community engagement has become a well established and accepted component of the planning process and public policy more generally despite some continuing concerns about the potential for community participation and stakeholder involvement to cause delays in policy development and decision-making (Innes, 1995; Healey, 1997; Morphet, 2005; Glasson and Marshall, 2007). The engagement of stakeholders in the plan-making processes reflects the practice of 'planning through dialogue' which has emerged with the shift to post-modernist principles of spatial strategy-making around the sharing of knowledge, community participation and negotiation (Murray, 2009: 134). This shift has been reinforced by broader changes within the public policy arena as concepts of traditional government have evolved into notions of 'governance' and 'third way' politics, and these have been embraced by the 'new' Labour Government since 1997 (Coaffee and Healey, 2003). The twin aims of enhanced participation and increased efficiency of service delivery lie at the heart of the UK Government's modernisation agenda (Cabinet Office, 1999). Part of the rationale for the renewed attention being given to community and stakeholder involvement reflects the fact that the involvement

of local residents and key stakeholders is seen as a way of ensuring that services meet the needs of individuals and organisations and that policies are effective. Additionally, participation is seen as a way of improving the relationship between stakeholders and local authorities and as a means of fostering stronger local democracy (e.g. CLG, 2008a).

This paper draws on the findings of two separate research projects examining participation and stakeholder involvement at the two different spatial scales of regional and local spatial planning in England. At the local level, the Spatial Plans in Practice (SPiP) research (Baker Associates et al, 2008b), sponsored by the Department of Communities and Local Government (DCLG) and undertaken by a consortia of five consultancies and universities, examined approaches to stakeholder involvement in Local Development Frameworks (LDFs) across England (Baker et al, 2006; Baker Associates et al, 2008a). A further, parallel, piece of work (Baker and Sherriff, 2009) involved a questionnaire survey and a series of stakeholder interviews to understand and evaluate the experience of being involved in the formation of the North West Regional Spatial Strategy (RSS). Supported by the North West Regional Assembly (NWRA), this built upon previous work with the Town and County Planning Association (TCPA) (Baker, Roberts and Shaw, 2003), which looked at stakeholder involvement in the previous regional planning guidance (RPG) process across the whole of England.

Drawing on this empirical base, this paper examines and compares current experiences of participation and stakeholder involvement at the local and regional levels in England and discusses the implications in terms of the effectiveness of this key aspect of the 2004 reforms and the future development of the English spatial planning process. To begin with, the next two sections of the paper provide an overview of previous literature on participation and stakeholder involvement. This is primarily based on a more comprehensive review of such literature, undertaken as a component of the Spatial Plans in Practice (SPiP) study (see Baker, Coaffee and Sherriff, 2005; 2007).

Contextualising Participation and Stakeholder Involvement

The 1960s saw the first formal recognition of the benefits to be derived from public participation in planning with the publication of the Skeffington Report. This Report from the Committee on Public Participation in Planning (1969) advocated ways in which the public might share and assist the plan preparation process from the earliest stage possible. This was formalised by a number of attempts to develop models of participation. Arguably the best known model of stakeholder involvement was developed by Arnstein in the late 1960s (Arnstein, 1969). Arnstein's 'ladder of participation' argued that the sole measure of engagement was the 'power' to make decisions and that the ultimate aim of participation was to gain 'control'. The relative power of the citizen was seen to increase as they progressed up the ladder. The simplicity of this model has proved popular in planning practice but has been criticised for assuming that participation strategies placed on the higher rungs of the ladder are superior to those beneath them. Such a model also fails to address questions regarding the appropriateness of engagement per se and the willingness of citizens and stakeholders to take the reigns of power and the responsibility this brings. For example, some parts of the planning process are highly technical and do not lend themselves to high levels of engagement and control. Many subsequent commentators have redesigned the Arnstein ladder to reflect the more complicated reality of multi-stakeholder engagement within the policy and planning process (e.g. Wilcox, 1994) but still retain a hierarchical structure, viewing citizen control of the process as the ultimate aim of involvement. In doing so, such alternative models can often be seen to close off many of the possibilities of achieving successful participation without necessarily bringing about empowerment. In short, such models, especially Arnstein's, continue 'to be applied uncritically, despite thirty-five years of progress in our understanding of the factors that drive engagement' (Tritter and McCallum, 2006: 156).

Equally, previous experiences of participation in planning have often been seen to have been inadequate for a number of reasons (e.g. Thomas, 1996; Bishop, 2001; DTLR, 2001; Baker *et al*, 2003, Kitchen and Whitney, 2004). These include a lack of resources; a lack of time to consult; a fear that

participation will cause project delays; a reluctance and/or lack of practitioner skills to engage with the public; a concern that stakeholders (especially community activists) are not 'representative'; jargon-filled and inaccessible planning documents; a wide-held belief that the general public are generally apathetic towards getting involved; and, importantly, general reluctance within the planning profession to embrace cultural change.

In the 1980s and 1990s, attempts to develop more inclusive and multiparty participation within what many have termed the emergent 'stakeholder society' led to the development of more collaborative concepts of engagement with the planning system. The overall modernisation and reform agenda pursued after 1997 drew on this development, with wide-ranging implications for the direction of planning policy as it sought to achieve successful participation (Healey, 1998; Bishop, 2001). Incorporating this approach into a policy development framework where multiple 'voices' are combined in some way, most notably through 'partnerships', has often been expressed practically in terms of a movement towards ideas of 'collaborative planning' (Healey, 1997, 1998). Such an idea recognises the increasingly complex multiparty governance arena that is created around spatial planning with 'more and more people, firms, pressure groups and agencies...coming to realise that they had a 'stake' in a place and...seeking a way to demand recognition of their stake' (Healey, 1998: 7). Concepts of collaborative planning have, in principle at least, been well adopted in the UK policymaking process. As Bishop (2001: 18) comments, 'the core of much participation work is therefore rooted in a search for consensus-based outcomes resulting from stakeholder deliberation, reinforced with feedback from the wider community'. However, a perceived weakness of collaborative planning is its overemphasis on cooperation and its neglect of the 'dark side of planning' (Harris, 2002); namely conflict and contestation resulting from power imbalances and individual/institutional agenda setting (see Flyvbjerg, 1998; Brand and Gaffkin, 2007). As Flyvbjerg and Richardson (2002: 47) argue '...communication is more typically characterised by non-rational rhetoric and maintenance of interests than by freedom from domination and consensus-seeking'. Whilst collaborative planning has been criticised for its liberal

undertones, notably for ‘...making adversary forces invisible and reducing politics to an exchange of arguments and the negotiation of compromises...’ (Mouffe, 1998: 13), collaborative planners acknowledge the role of power and contestation in the acquisition and framing of knowledge for use (Healey, 1998). However, rather than seeing power and contestation as undermining the discursive process, advocates of collaborative planning conceptualise conflicts as ‘creative tensions’ that bring different perspectives into the wider policy fold (Brand and Gaffkin, 2007). By virtue, the collaborative ideal is optimistic and thus asserts that power and contestation can be harnessed for the greater ‘social good’.

The discussion thus far raises the question as to how a ‘stakeholder’ is defined. Stakeholder theory proposes that those with a ‘stake’ in a particular process or context are brought together in managed ways to deliberate on key issues of mutual relevance. According to Carroll (1993: 60), a stakeholder is ‘...any individual or group who can affect or is affected by the actions, decisions, policies, practices, or goals of the organisation’ (Carroll, 1993: 60). In this vein, Boaden *et al* (1980) distinguished between three main groups of stakeholders involved in the planning process:

- *major elites* – without whose co-operation or advice the local planning authority would find it difficult or even impossible to adopt and implement plans;
- *minor elites* – composed of voluntary organisations active in the area;
- *the public as individuals* – some of whom may be part of major or minor elites.

From this distinction it is apparent that engagement with ‘partners’ and engagement with ‘the community’ form two different aspects of overall stakeholder engagement (Leach *et al*, 2005). This highlights an important distinction between what are termed ‘organised partners’ and ‘unorganised public’ (Leach *et al*, 2005: 3). The categorisation of stakeholders is obviously useful for understanding the types of stakeholders that are involved or not involved in the process. However, from a practice point of view, arguably more important than the categorisation itself is the acknowledgement that stakeholders are not all the same and that a broad brush strategy to involve stakeholders is unlikely to be

fully effective (ODPM, 2004a). As a result, the success of a participation exercise is dependent on the strategy chosen to engage specific stakeholders. Ideally, the choice of technique for engaging stakeholder should reflect the overall objectives of the participatory process. In this vein, Leach and Wingfield (1999) offer a typology of methods of participation:

- *those that are essentially traditional* – e.g. public meetings; consultation documents; question and answer sessions;
- *those that are customer oriented* – e.g. opinion polls and questionnaires;
- *new innovative methods that are designed to consult citizens on issues* – e.g. interactive websites, citizens' panels, focus groups;
- *new innovative methods that encourage greater citizen deliberation over issues* –e.g. citizens' juries, community plans, issue forums.

This typology has been taken forward by Petts and Leach (2001) who offer a useful categorisation of potential participation methods based on four different levels and three types of participation: traditional (T); innovative consultative (IC); and innovative deliberative (ID). They also set out their own criteria in relation to the choice, design implementation and evaluation of public participation methods (Figure 1).

Table 1: Typology of Methods for Engaging Stakeholders

Level 1: education/information leaflets/brochures (T) newsletters (T) unstaffed exhibits/displays (T) advertising (T) local newspapers (T) national newspapers (T) videos (IC) site visits (T)	Level 2: information feedback staffed exhibits/displays (T) telephone help lines (T) Internet (IC) teleconferencing (IC) public meetings (T) surveys, interviews and questionnaires (T) deliberative polls (IC)
Level three: involvement and consultation workshops (IC) focus groups/forums (IC) open-house (IC) open-house (on the Internet) (IC)	Level four: extended involvement community advisory committees/ liaison groups (ID) planning for real (ID) citizens' juries (ID) consensus conference visioning (ID) visioning on the Internet (ID)

Source: Petts and Leach (2001)

However, the few recent surveys of participation and stakeholder involvement in the planning system show that traditional approaches still dominate participatory approaches. Sykes (2003) shows with the exception of the use of IT-based consultation through interactive websites, the dominance of traditional forms of consultation, exhibitions and public meetings in recent exercises. Likewise, a recent study into stakeholder involvement in regional planning found little in the way of innovative practice, certainly beyond the earliest (pre-submission) stages of the Regional Planning Guidance (RPG) preparation process. This was despite the fact that less traditional methods such as more inter-active workshops, working groups and stakeholder panels, were popular with stakeholders. Research for the Scottish Executive also found that 'even the more enlightened authorities' (which may have abandoned public meetings as a means of consulting) still rely on consultation techniques that require individuals to be sufficiently motivated to turn up to events or respond to questionnaires. Consequently they tend to get low response rates dominated by those stakeholders motivated by the process (PPS Local and Regional Ltd, 2005: 38).

Adopting the most appropriate technique for engaging stakeholders is clearly important to more successful involvement but, equally crucial is the need to reduce barriers to stakeholder involvement. Rydin (2000) considers that the key to successful participation is the trade-off between the costs and benefits of getting involved as perceived by the potential participants. In addition, fostering more effective participation is dependent on having a strong and responsive leadership culture that has the capacity to overcome barriers to stakeholder involvement as well as resources in place to foster innovative approaches to consultation (Diamond and Liddle, 2005). Research has identified a range of barriers to involvement such as making consultation meetings more accommodating (Involve, 2005); the need to tackle inertia and suspicion about consultation exercises as well as overcoming consultation fatigue (Lucas and Fuller, 2005); the need to create appropriate institutional structures that allow all stakeholders to express views (Healey, 1998); the need to identify and involve hard to reach groups

(Kitchen and Whitney, 2004); and the need to improve cultural sensitivity with regard to stakeholder consultation exercises (Parekh, 2000; Manchester City Council, 2005).

Stakeholder Involvement in Local Development Frameworks and Spatial Regional Strategies in England

The 2004 spatial planning reforms in England led to the introduction of a system of Local Development Frameworks (LDFs) (local spatial plans) and Regional Spatial Strategies (RSS) (strategic regional spatial strategies). Unlike the Regional Planning Guidance (RPG) documents they replace, the RSS is an integral part of the statutory development plan, alongside the development plan documents that make up the Local Development Framework (LDF) for an area, thus reinforcing the standing of regional planning (Pearce and Ayres, 2006).

The purpose and content of Regional Spatial Strategies (RSS) are detailed in *Planning Policy Statement 11 (PPS 11)* (ODPM, 2004b). They are intended to set out a broad development strategy for the region for a 15 to 20 year period and in particular identify the scale and provision of new housing, priorities for the environment, and directions for transport, infrastructure, economic development, agriculture, minerals extraction and waste treatment and disposal. National guidance dictates that the preparation of the RSS must be carried out through partnership working with regional stakeholders. This partnership working, which should include a range of stakeholders (e.g. statutory agencies and bodies; business and commercial organisations; house builders; health and education trusts; and neighbouring local authorities), should take place throughout the process, not only at the stage of the submitted draft (ODPM, 2004b). Alongside 'partnership working', PPS 11 also calls for 'community involvement'. The wider-community is defined as all those who have an interest in and a contribution to make to the content of the revised RSS and therefore should include members of the community as well as local authorities and various interest groups.

In terms of LDFs, *Planning Policy Statement 12 (PPS12)* (CLG, 2008b) states that local planning authorities should involve stakeholders throughout the process of preparing local Development Plan Documents (DPDs). This reflects the government's concern that DPDs are locally distinct, that they have buy-in from across the range of delivery stakeholders, and that the documents are tailored to the needs of the local community. In addition, the local authority is required to prepare a Statement of Community Involvement (SCI), developed and published as part of the plan preparation process. The SCI should explain how community involvement in the LDF process links with other community involvement initiatives, particularly the Community Strategy. It should identify the community groups that need to be involved and the techniques required to involve them effectively, both formally and informally. The SCI should also demonstrate when stakeholders will be consulted, how the process of involvement is to be resourced and managed effectively, and how the results will feed into the preparation of DPDs.

Stakeholder involvement is identified in *Planning Policy Statement 1 (PPS1)* (ODPM, 2005a) as a mechanism for ensuring efficacy and equity in plan and policy-making at local and regional levels. Local and regional levels in England are congested institutional landscapes and are characterised by differences in governance structures. The ethos of the current policy framework with respect to stakeholder involvement in spatial policy development is summarised in Table 2. Couched in terms of the LDF process, the principles apply just as much to stakeholder involvement at the regional and sub-regional scale through the RSS.

Table 2: Principles of Stakeholder Involvement in Spatial Planning in England

Principle of Stakeholder Involvement	Explanation
Involvement that is appropriate to the level of planning	Arrangements need to be built on a clear understanding of the needs of the community and to be fit for purpose
Front loading	There should be opportunities for early stakeholder involvement in the plan-making process
Adoption of appropriate methods for engaging stakeholders	Planning authorities need to be sensitive to the needs and experiences of stakeholders so that they adopts a method for engagement that has the scope to be effective
Continuing involvement	Planning authorities need to recognise that consultation is not a one-off event and that continued involvement of stakeholders is the only way to develop capacity and to foster a sense of plan ownership
Transparency and accessibility	Plans and policies need to have the capacity to be scrutinised by stakeholders, including members of the public, so the plan or policy needs to be written in plain English in an accessible way

Source: Adapted from PPS 1 (ODPM, 2005a)

Methodology

This discussion in the previous sections raises four key questions that will be addressed during the course of the paper:

- To what extent are the 2004 reforms leading to a more inclusive and ‘stakeholder driven’ plan-making process?
- What strategies are being adopted to involve stakeholders in the new planning system and do these represent a progressive approach to stakeholder involvement compared to past practices?
- What are the barriers that stakeholders are facing in getting involved in the LDF and RSS plan-making processes?
- What needs to be done to enhance stakeholder involvement in the LDF and RSS processes?

In considering these questions the paper reports the findings of two studies undertaken between 2007 and 2008 into stakeholder involvement in the new spatial planning system in England; one at local level (LDF) and one at regional level (RSS). A specific component of the *Spatial Plans in Practice (SPiP)* project - a major three year study sponsored by UK central government of the new local planning system in England - was a study into effective stakeholder involvement in the planning process following the 2004 reforms. The second study, partially supported by the North West Regional Assembly (NWRA)

explores the experience of stakeholder in the formation of the Regional Spatial Strategy (RSS) for the North West of England. Although the focus was only on one region (the North West), the earlier TCPA research (Baker et al, 2003) had generally revealed very similar experiences across all of the English regions and there were no obvious reasons to believe that the experiences of the NW in terms of RSS preparation are likely to be significantly different from that of other regions of England in terms of either their approaches to stakeholder involvement or of the subsequent stakeholder responses, not least because the main government guidance on RSS preparation as set out in PPS11 (ODPM, 2004) is universal. The benefit of focussing on just one region was to allow a deeper examination of the issues through stakeholder interviews and open-ended questionnaire replies that would not have been possible in terms of timing and resources if all regions were to have been covered in the research. The focus on both the local and regional scale is important because, after the 2004 reforms, the RSS become a statutory part of the development plan alongside the LDF. Hence, this study provided a timely opportunity to explore the practice of involving stakeholders at both of the spatial scales that together form the statutory development plan for an area. It is noted that, since these two pieces of research were undertaken, further reform linked to the government's review of sub-national economic development and regeneration (HM Treasury, 2007; CLG and BERR, 2009) has led to the abolition of the NWRA and its replacement by 4NW (the NW Regional Leaders Board) and the RSS is to be replaced with a new integrated regional strategy (RS) to be led jointly by 4NW and the North West Development Agency (NWDA). However, the new RS will remain a statutory part of the development plan and the wide engagement and involvement of stakeholders and local communities is integral to the RS preparation process (NWDA and 4NW, 2009). The lessons that have emerged from our research into community and stakeholder engagement will therefore be equally relevant and valuable to the new RS process.

This paper therefore draws on the findings of three interlinked methodological components from the two studies mentioned above in order to chart the practice of stakeholder involvement in the

reformed spatial planning system in England at both the local and regional/sub-regional levels. These components are:

1. A review of the 'Pre-Submission Statement' for the North West RSS and of twenty-three Statements of Community Involvement (SCIs) prepared as part of the LDF to determine whether the new system has prompted new approaches to involvement. The 23 local authority SCIs were chosen, in the main, from the local authorities investigated through the longitudinal case studies as part of the broader SPiP Study, supplemented by some further SCIs chosen from advice given by the partner organisations involved in this study, including the Planning Inspectorate, in terms of emerging practice. The original SPiP case study areas were chosen on the basis of geographical spread, local context and sufficient progress in LDF preparation (there was little point in choosing authorities that did not intend to engage in LDF work during the timescale of the study)ⁱ.
2. Two tailored stakeholder surveys (one related to LDF preparation and designed as part of the SPiP study; the other designed specifically with the NW RSS in mind) to assess the extent to which the new planning system is prompting new attitudes to engagement and whether the interests of stakeholders are being accommodated by the new procedures. The LDF survey was sent to representatives of different stakeholder interests varying in type from government agencies to federations of private sector interests and non-government organisations, eliciting a 50% response rate. The RSS survey was sent to 2618 potential stakeholders and interested parties and individuals who were included on a database provided by the North West Regional Assembly and elicited 102 responsesⁱⁱ.
3. A series of semi-structured interviews with a small subset of respondents to the LDF and RSS surveys and other key actors in the LDF or RSS processes, designed to explore in more detail the issues identified earlier through the surveys.

Review of Statements of Community Involvement

The review of the SCIs was undertaken to explore whether planning authorities are going beyond traditional approaches for involving stakeholders by developing more innovative and inclusive techniques for involvement. The review was also intended to explore the extent to which the available SCIs reflected national planning guidance with respect to facilitating stakeholder involvement. This focused on criteria such as the clarity of the SCI, the length of the SCI, presentation practices used in the SCI, references to partnerships in the SCI, strategies to save (and effectively increase) resources for stakeholder involvement, and the identification and engagement of hard-to-reach groups.

Style and Accessibility of SCIs

The review found that many of the SCIs were broad and generic, used complicated terminology, and were often too long to effectively communicate the planning authorities approach to stakeholder involvement in the planning process (also see Brewer and Alexander, 2007). The SCIs also tended to be vague when describing approaches to stakeholder involvement. There were also a number of instances of SCIs including information that did not seem relevant to the public. In some cases, hard-to-reach groups are not mentioned and when groups are listed there is no indication of how and when they will be engaged. Thus, evidence suggests that many SCIs are relatively inaccessible and fall short of fulfilling their role as community engagement strategies, in spite of guidance aimed at improving community engagement in planning including ensuring that SCIs are accessible and engaging to non-planners (Royal Town Planning Institute, 2005).

Innovative Methods of Involvement and Hard-to-Reach Groups

The literature above refers to the Leach and Wingfield (1999) typology of methods of participation; ‘traditional’, ‘customer-oriented’, ‘innovative consultation’, and ‘innovative deliberation’. The review of the SCIs suggests that these methods can be distinguished further on the basis of the following

criteria: the first criterion can be defined as either 'long-term measures' or 'immediate measures'; the second can be described as 'in-breadth' and 'in-depth' methods of consultation and the third can be considered as 'come to us' or 'go to you' approaches. The third category can perhaps provide the best examples of what innovative practices of consultation could be. Traditional approaches tend to encourage community members and stakeholders to 'come to us' and view plans and proposals at local authority specified locations (Petts and Leach, 2001). However, this approach does not adequately engage the more 'hard-to-reach' groups (e.g. Beebeejaun, 2004). More innovative approaches take the opposite stance by actually 'going to' people and localities and engaging in face-to-face activities such as meetings and workshops. Focus groups can be targeted at particular sections of local communities, such as hard-to-reach groups, to receive responses from those not normally motivated to get involved (ODPM, 2005b).

The SCI review found some evidence, or at least suggestions, of planning authorities using the 'going to' approach in the form of road shows and display stalls (e.g. Hounslow, Plymouth, and West Berkshire). In other instances, Consultation Toolkits have been developed to underpin stakeholder consultation exercises (e.g. West Berkshire and Reading). The Toolkits provide comprehensive explanations of how, what and why techniques should be used. One example of a Consultation Toolkit developed by West Berkshire emphasises the use of 'partnered meetings' rather than 'one-on-one meetings' because hard-to-reach individuals are more likely to come with a friend than by themselves (Beebeejaun, 2004; Frank, 2006). A noticeable theme in the SCI consultation strategies is the practice of 'bringing people together' through group consultation exercises. Forums and representative groups (e.g. Reading, Plymouth and the North West) are intended to allow cross sections of views to be gauged, and workshops such as, Planning for Real (e.g. Reading and Bristol) and Enquiry by Design (e.g. Reading, West Berkshire and Northampton) have been identified as mechanisms for bringing communities and stakeholders to engage in the details of site specific areas and area based policy (e.g. NEF, 1998).

However, whilst there are examples of a degree of innovative thinking within the SCIs with regard to the adoption of methods for involving stakeholders, these were the exception rather than the rule. Indeed, numerous SCIs openly admit to simply building on traditional methods of involvement and, although they frequently contain long lists of approaches for involving stakeholders, there is often little evidence that methods of stakeholder involvement have been modified to suit specific DPDs; different stages in the process; or even the type of stakeholder(s) involved. As such, there appears to be little evidence of significant ‘culture change’ in the consultation practices of many planning authorities (Brownill and Carpenter, 2007), which raises concerns over the capacity of the SCIs to deliver improved stakeholder involvement (Brewer and Alexander, 2007).

Resource Management

Since the 2004 reforms were introduced, there has been recognition that local authorities would struggle to implement the reforms with current resources (Amos, 2004). Previous research has found that stakeholder consultation is resource intensive and consequently implementing innovative approaches to stakeholder engagement often requires that planning authorities develop innovative methods of resource management (Diamond and Liddle, 2005). To overcome this problem, both Hounslow and 4NorthWest have employed e-government strategies to overcome resource constraints. Both planning authorities are relying on easy access to their websites and emailing consultees to reduce production costs of hard copy plans. In the case of Hounslow, the financial resources that would have been used to produce hard-copy plans are being reallocated to fund more extensive consultation exercises.

In a relatively unique practice, Forest Heath District Council made an explicit commitment to ring-fence financial resources in their LDF production budget for stakeholder consultation. One interviewee (a Friends of the Earth representative) suggested that a reason why this kind of forward planning approach is not adopted by many planning authorities is that unlike development control, local authorities are not set service performance targets for community involvement, which is why planning

authorities are likely to give priority to, and invest in meeting other targets. The interviewee argued that one likely effect of prioritising development control targets to determine levels of Planning Delivery Grant could be the discouragement of investment in innovative methods for stakeholder involvement. However, whilst most of the SCIs are strong in identifying who to consult and when (guidance on this is set out in PPS12), generally the section dealing with resources in the SCI is weak (Brownill and Carpenter, 2007). This seems to reflect the fact that planning authorities find it difficult to predict and allocate resources for stakeholder involvement, which is not helped by a lack of guidance and the difficulty that the Planning Inspectorate (PINS) has in advising authorities on resource allocation for stakeholder involvement. For example, the PINS framework for assessing DPDs through the test of soundness (PINS, 2005), provides detailed guidance to planning authorities about the involvement of stakeholders in plan preparation; however, the resource practicalities of organising and undertaking stakeholder involvement exercises is conspicuously absent.

Joint Working and Partnerships

The role of partnerships and joint working to facilitate stakeholder consultation has been strengthened since 2004 (e.g. Tewdwr-Jones *et al*, 2006) through the development of new networks of governance (Doak and Parker, 2005), underpinned by the ethos of collaborative planning (Healey, 1997; 1998). For example, following the introduction of the new system, West Berkshire Council implemented a scheme in which they pool planning resources with other council departments in an attempt to extend their LDF budget. The Council has also appointed a Partnerships' Officer to coordinate consultations across sectors. In other authorities (e.g. Northampton and Chelmsford), it is noted within the SCI that resources are scarce, and that outside help is needed in order to bridge the financial as well as practical hurdles facing authorities in engaging stakeholders (e.g. from planning consultants, developers, and Planning Aid) (e.g. Rydin, 2000).

From a policy perspective, joint working is important if authorities are to achieve the Government's objective of increasing the front-loading of involvement. Evidence suggests that front-loading is having a beneficial impact on the way that plans are being developed (Brownill and Carpenter, 2007). However, there is also evidence that joint working needs to be undertaken to a greater extent with the development industry. Private developers have complained to the Inspectorate that their views are often overlooked in the plan-making process and according to the representative of PINS overcoming this issue is a key challenge for the new system. This view is supported by Townsend and Tully (2004) who found that house builders often fail to get involved in the plan-making process, particularly in the early stages. This has helped to foster a negative view of community involvement within the private development sector reflecting the perception that stakeholder involvement is unhelpful and unviable given the high costs incurred relative to the consultation outcome. According to the PINS representative, the adoption of poor involvement strategies and practices are helping to undermine the sustained involvement of private sector developers in the plan-making process.

Stakeholder Experiences and Perceptions of Involvement in the LDF and RSS Processes

From the point of view of LDFs, local authority respondents to the strategic survey appear confident that stakeholder involvement is proving beneficial, particularly in helping to inform the production of a sounder submission document and contributing to more robust policies. Indeed, 62% of local planning authorities surveyed agreed that, compared with the local plan, the LDF would deliver stronger community and stakeholder involvement (otherwise 22% disagreed and 16% remained impartial). One reason cited for this in a number of the interviews was the progress made in the 'concretisation' of local authority commitment to stakeholder involvement through the development of SCIs. This view was also reflected in a number of interviews with stakeholders involved in the LDF process. The National Planning Forum, RTPI, and Local Government Association (LGA) representatives suggested that SCIs

are proving useful in helping planners to change the way they think about the possibilities for stakeholder, and particularly community, involvement.

However, there was considerable scepticism of the benefits of SCIs among many interviewees. One such interviewee argued that there is no evidence that the views' of planners or stakeholders with regard to planning issues are being altered by SCI production. Planning Aid's representative commented that many of the documents are 'unfriendly to users', and that they are frequently 'long on aims and short on engagement exercises'. A Friends of the Earth representative describes SCIs and subsequent consultations as 'tick box exercises', while the representative of the Commission for Architecture and the Built Environment (CABE) suggested that the sheer number of consultation exercises is contributing to 'consultation fatigue' particularly on the part of statutory stakeholders (Baker *et al*, 2007). Whilst stakeholder involvement is seen by some to be 'exceptionally important' to the planning process (see Planning Aid), a lack of understanding of how and when stakeholders should be consulted is undermining progress. The representative pointed to SCIs as a potentially important tool for communicating with stakeholders and for operationalising commitment to stakeholder involvement but, in their present form, SCIs are inadequate, not least because most evade the question of sufficient resources or how and when consultation will take place (Brownill and Carpenter, 2007).

The evidence from the North West RSS survey also raises questions as to the progress made in making the RSS process more inclusive. Although 41% of respondents to the RSS survey commented that they were satisfied that the consultation process allowed sufficient scope for them to express their views, a slightly higher number (46%) were unsatisfied with the opportunities that were available to get involved in the RSS process. In combining the respondents to these two questions, it is noticeable that the most dissatisfied were the 'other local Government agencies' which primarily covered parish councils (81% were dissatisfied), local neighbourhood groups (64%), and environmental groups (52%), whilst the most satisfied were local planning authorities (74% were satisfied). The relatively low response rate for some stakeholder categories would make any statistical analysis, broken down by

stakeholder type, unreliable. However, additional and more expansive responses to the open-ended questions, and from the subsequent interviews, can add further depth to the analysis. In particular, representatives of the 'other local Government agencies' (primarily parish Councils) were particularly vocal in their comments about their lack of awareness of the opportunity to input and, where they had been able to take the opportunity, of the amount of information that needed to be read; the time and person-resources needed to process this information; and the difficulty in understanding all the terms and jargon involved. For example:

“Because they have better things to do, none of the (Parish) Councillors would wish to absorb a 120-page document (let alone the three other main documents, the Sustainability Appraisal and Summary and the Technical appendices – a further 356 pages!) unless it was relevant, illuminating, concise and clear. The RSS is none of these things!”

Other interviewees commented that it would have been useful to have a better indication of how the plans in the RSS were likely to affect their particular localities. This highlights the challenge of involving smaller, local community groups in regional decision-making, when their focus is primarily local (Baker *et al*, 2003). In general, there is clearly a feeling of disenfranchisement that emerges from the questionnaire responses and interviews that is particularly expressed by smaller stakeholder groups and those less connected with the planning process on a daily basis.

An important issue that emerged from the RSS stakeholder interviews was the view that the North West RSS consultation began as an inclusive process and that there was a strong emphasis on involvement but that, as the process evolved and as the pressures to submit a strategy within the Government's timescale intensified, opportunities for involvement for a number of voluntary consultees appeared to regress. One respondent from a campaign organisation observed that, part of the way through the process in spring 2005, the NWRA effectively made itself less accessible to consultees and it was difficult to feed into the RSS policy subgroups that had been set up. There was an initial project

plan, in which various consultees had been involved in developing, but it was pointed out by one interviewee that this was replaced with a new project plan that ‘had less democratic legitimacy’. In another example, a government agency interviewee remarked that they had commented on drafts of policies, which were then returned rewritten, seemingly without having taken on board their comments. The interviewee commented that this is possibly a reflection of shifting Government policies that meant that RSS policies were constantly being rewritten to conform to national policy. This reflects the findings of Baker and Hincks (2009) who found that infrastructure delivery and plan implementation was, among other factors, being constrained by the absence of a ‘bedding-in period’ for new planning policies and guidance.

Evidence from both the LDF and North West RSS surveys suggests that the business sector is finding it particularly difficult to engage with the new process (also see Townsend and Tully, 2004). One of the main reasons is simply the scale of plan making - with nearly 400 local planning authorities in England, producing a number of new planning documents for which there are potentially three stages of participation plus a public examination. Consequently, the CBI finds that when it comes to general business interests there is little involvement among their members below regional strategy level and that, even at regional level, their involvement tends to be linked to a greater extent to the Regional Economic Strategy (RES). Likewise, most house builders, apart from the largest and most organised, are reliant on the House Building Federation (HBF) to make their views known. In any event, at regional and core strategy levels, their interests are frequently competitive and, in consequence, they either do not make representations or simply combine to question overall housing growth numbers. They find it easier to become individually involved at a local level when they are able to support their own site interests (e.g. through AAPs). However, small house builders find it extremely difficult to engage with the process as they do not benefit from the economies of scale which allow the house builders dealing in large volume developments to engage. As one representative of a small developer states ‘...we deal in smaller sites...we don’t have capacity to deal in large volume developments...We seemed to have slipped under

the radar of the planners'. This view contrasts strikingly with the view of a local planning authority who responded to the strategic survey. They found it relatively easy to engage with developers. This may, however, be explained as a difference in perception. Local planning authorities are unlikely to know whether they have engaged with all the necessary developers until they have proceeded to later stages of the process and it may be that this is a view that will change over time. However, this is essentially the challenge of implementing effective front-loading practices capable of engaging the development sector (Brownill and Carpenter, 2007).

Overall, the evidence at both local and regional levels suggests that, while the new system is designed to be as inclusive as possible, it is still the case that certain groups are at a disadvantage in achieving engagement and that some stakeholders who are crucial to the implementation of plans (such as small developers) are still finding it very difficult to engage in the plan-making process.

Strategies for Involving Stakeholders: Evidence of Progression?

The examination of both the LDF and North West RSS consultation processes provides limited evidence that some more effective methods of involving stakeholders are being employed but there were reservations about the universality of progress suggesting that traditional involvement strategies remain commonplace and are falling short of igniting enthusiasm to engage in the process. The LDF strategic survey found that 65% of planning authorities have engaged with the community in the past through 'traditional' engagement methods such as, public meetings, exhibitions and leafleting. However, the same percentage of authorities also intend to use these methods in the future, both at the 'issues and options' stage and at the 'preferred options' stage of LDF preparation. This is an interesting finding, given that the strategic survey also found that 36% of local planning authorities have, to date, found it difficult to engage with local communities, while 30% said they had mixed experiences of engaging the community depending on which issue was being consulted upon. However, the evidence suggests that few local planning authorities have yet tried to engage with the community through more 'innovative'

approaches such as focus groups and interactive websites and many appear reluctant to change in the near future.

In any event, evidence from the North West RSS study suggests that even innovative approaches are not always effective at engaging stakeholders. The original RSS consultation process made deliberate and extensive use of the Internet as a communication and consultation medium. However, not all interviewees were in agreement that this innovation was an ideal way to consult stakeholders (e.g. see Petts and Leach, 2001). In some cases, this reflects practical concerns. For example, a representative of a Greater Manchester-wide body reported problems with getting ‘sign off’ across his organisation. The interviewee highlighted that a paper submission could be signed by several parties, whereas the electronic system allowed for only one signatory and no way of confirming that this person represented the views of a particular organisation. Other comments on the use of electronic media included issues over accessibility for those with poor eyesight, low band-width internet connections, or no internet connections at all (OECD, 2003). It was also suggested that electronic consultation did not facilitate debate because people were inputting their comments individually without seeing those from other people.

There were also concerns about the general effectiveness of methods for involving stakeholders (see Leach and Wingfield, 1999). For example, one representative from an environmental organisation raised concerns that there is a ‘danger that some local planning authorities leave the entire master planning and consultation to the developers due to resource constraints’. This interviewee commented that this practice can lead to a public relations exercise rather than independent public consultation and raises questions of legitimacy and compromises the arbiter role of authorities. Planning Aid’s representative was also critical that few local authorities provide any evidence of identifying hard-to-reach groups (see Brownill and Carpenter, 2007; Baker *et al*, 2007). Consequently, it is argued that, some groups such as ‘the very mobile in the private rented sector’ are omitted from consideration. In

addition, the interviewee also noted that there is too much emphasis on formal involvement and insufficient emphasis on 'fun' and intuitive methods of involvement.

One of the cornerstones of the new planning system is the requirement that plan-making be informed by a front-loaded approach to stakeholder consultation (ODPM, 2005a). A Countryside Agency representative suggested that 'early involvement....is critical if stakeholders are to fully inform policy development'. Similarly, a National Planning Forum representative agreed that earlier and more open discussions can lead to consensus but, suggested that it is going to be difficult to avoid late representations as 'there will inevitably be changes affecting the plan through its preparation'. Indeed, a potential down side to involvement from the earliest opportunity is the subsequent repetition of consultation and the necessity to engage regularly with the same document to little evident effect (e.g. Lucas and Fuller, 2005). Even more damning to the idea of front-loading was the view that achieving consensus at an early stage is 'an illusionary concept that will not prove to be an effective means of reducing objections/late changes to most plans' (a local government representative) (see Townsend and Tully, 2004). The timing of both the LDF and North West RSS surveys means that it is perhaps too early to tell whether this front-loading approach is working: there is some evidence that engagement is happening earlier, but the evidence from the LDF and RSS research suggests that the practice of front-loading is often restricted to the involvement of established stakeholders who have experience of involvement in the planning process (also see Bailey and Peel, 2002). The stakeholder responses would also suggest that groups and individuals with a local focus are less likely to be motivated to take part at an early stage when the implications of more broad-brush regional and sub-regional policies is less obvious.

Barriers to Stakeholder Involvement

A number of barriers to stakeholder involvement were identified through the LDF and RSS research. Both studies demonstrated that there is a lack of differentiation between approaches used at different

stages of the stakeholder consultation process and involvement was found to be further undermined by not adapting engagement techniques to the type of stakeholder being consulted. In terms of involvement in the RSS process in particular, this makes locally relevant involvement difficult especially in terms of involving the public. However, this seems to reflect a broader problem with public engagement in and with the RSS exercise. The concept of the 'regional level' is difficult to engage with meaning that broadly the public fail to appreciate the relevance of the RSS to the future development of their local area. As a result, the public tend to be less interested in engaging in the RSS process compared to the LDF process because they are generally less able to relate to the policies and proposals contained within the RSS (Baker *et al*, 2003). This is reflected in the results of the RSS questionnaire survey in which a significant number of respondents who did not get involved in the original RSS consultations (labelled A in table 3) reported difficulties in understanding either the RSS process (47%) or the regional planning system in general (58%) compared with only 7% and 4% respectively for respondents who were actively involved (labelled B in table 3). Seemingly, this lack of awareness and understanding of regional planning for those respondents who did not get involved in the RSS process has been underpinned by poor access to information. For many parish councils and neighbourhood groups involved in the RSS research, the RSS questionnaire survey was apparently the first indication they had had about the RSS, despite the fact that they were on the North West Regional Assembly consultation database. Another local neighbourhood group expressed their lack of knowledge about the RSS succinctly, 'I have no idea what you are talking about I have not met anyone who knows what an RSS is'.

Both the LDF and RSS studies found that resource constraints were a significant barrier to effective involvement of stakeholders. The RSS questionnaire survey found that, for respondents who had not taken part in the RSS consultation but had answered our survey, the pressure on staff resources and the amount of additional work and research needed to engage in the new system was particularly problematic. For example, local neighbourhood groups and parish councils found it difficult to participate for this reason. As one Parish Council interviewee commented:

Non-professional groups such as ours are not geared up to participate fully. Yet our views are more valid than ‘establishment’ planning professionals as we have better evidence and first hand knowledge of the effect of policies.

A lack of resources also impacted on the policy-makers. For example, one interviewee involved in the LDF preparation process stated that a lack of resources to undertake stakeholder consultation exercises has undermined the impact of Statements of Community Involvement (SCIs) and therefore reduced the SCI preparation process to a ‘tick-box exercise’ which planning authorities ‘just needed to get through’.

Table 3: Barriers to Involvement in the RSS process

Potential Barriers to Involvement	Respondents who did not take part in RSS (A)		Respondents who took part in RSS (B)	
	Total No	%	Total No	%
Staff resources required too high.	2	10.5	18	31.0
Financial resources required were too high.	1	5.3	4	6.9
Timing of meetings/events etc. made getting to them difficult.	2	10.5	6	10.3
Location of venue of meeting/events etc. made them too difficult.	3	15.8	7	12.1
Disabled access for venue of meeting/events etc/ was insufficient.	0	0.0	0	0.0
Access to data/information was difficult.	4	21.0	7	12.1
Provision of information in specialised formats, e.g. brail/ languages other English, were insufficient.	0	0.0	0	0.0
Insufficient IT skills.	1	5.3	3	5.2
Amount of additional work / research required was too high.	3	15.8	13	22.4
Did not have sufficient information to understand the RSS process.	9	47.4	4	6.9
Did not have sufficient information to understand the regional planning process.	11	57.9	2	3.5
Other	3	15.8	1	1.7

The LDF and RSS interviews found that parish councils and neighbourhood groups were often despondent about the consultation process because they felt that views were marginalised compared with

other stakeholders who 'have louder voices and more influence [with the planning authority]'. In expressing frustration at the lack of weight given to their evidence base and in feeling 'totally ignored' one interviewee commented, 'tell me what is the point of taking part...we're not listened to?' A number of interviewees from parish councils and neighbourhood groups commented that additional resources and guidance should be available to 'smaller' stakeholders to motivate them to engage in planning, and additional weight should be given to their comments to ensure that their views are not ignored.

The SCI review also demonstrated that the SCIs are often too long and use impenetrable language. The RSS and LDF interviews found that the complexity and technical language of the new system is a considerable barrier to the engagement of non-experts and as a result excludes certain stakeholders from engaging in the process. For example, although the draft RSS document contains a glossary of terms, there is no list of abbreviations and acronyms and no cross-referenced index of policies. For individuals with no direct involvement in the planning system, the consultation documents were also difficult to deal with which made the interviewee question how inclusive the process could be:

I do remember noting that many of the consultees and 'stakeholders' who had responded were representatives of (for want of a better term) corporate organisations of various kinds. The number of individuals, like myself, who had shown any interest appeared to be very small. This raises the question of how the 'little man', as opposed to the big organisations, is supposed to gain access to strategies of this kind which have long-term implications for the areas in which he lives, and which are determined at a level he can neither access nor understand.

This highlights an important issue, which is that, communicating complex issues to non-experts often results in documents being long, time-consuming to read and overly technical, making the process counterproductive. The general consensus as to the likely outcome of the impenetrability of the technical

language and concepts used in the new system was captured by one respondent who commented that ‘consultees will progressively pay less and less attention as requests for opinion involve them in prolonged unnecessary reading’.

In spite of the fact that the new spatial planning system is intended to be underpinned by collaboration, partnership working and joined-up governance, a number of respondents identified continued ‘silo’ thinking as a barrier to effective involvement. This is captured by the experience of the Environment Agency representative during the consultation exercise for the RSS. The interviewee noted that he was placed in the ‘environmental’ discussion group rather than being able to engage in open discussions on issues such as the impact of housing on the environment. The interviewee commented that this ‘was pointless because it didn’t give us the opportunity for frank debate which is what’s needed’. Similarly, a private sector company dealing with waste had wanted to raise the issue of sewage sludge since they were planning to build a treatment facility, yet this participant had been categorised as ‘water’ and therefore did not have an opportunity to participate in the focus group on ‘waste disposal’.

A number of interviewees involved in the LDF and RSS process also expressed concerns that the requirement to compile evidence was a drain on time and resources, particularly for ‘smaller’ and voluntary organisations. One example was that of a cycling campaigner proposing the consideration of new and untested cycling promotion policies but did not have the resources to back this up with hard evidence. It was also suggested that compiling evidence is difficult when proposing relatively new ideas for which there is not already an established evidence base. One interviewee commented that the requirement to produce evidence to ‘back-up everything’ was stifling policy innovation and was likely to be ‘deterring forward looking people from getting involved’.

In summary, the evidence from both the LDF and RSS research indicates that the practice of stakeholder involvement remains challenging for planning authorities. Among other things this reflects the fact that many of the barriers to involvement in the planning process remain insufficiently addressed

to allow creativity and innovation in stakeholder exercises to flourish (Brownill and Carpenter, 2007: 619).

Discussion and Conclusion

In the context of the 2004 planning reforms and the new forms of spatial strategies at the local (LDF) and regional (RSS) levels in England, this paper set out to examine the extent to which the reformed system is leading to a more inclusive and ‘stakeholder driven’ plan-making process. Enhanced, and earlier, opportunities for participation and stakeholder involvement are amongst the key principles of the reforms, emphasised in repeated government policy statements on the LDF and RSS processes (e.g. ODPM, 2004b; CLG, 2008b). These processes incorporate new requirements for policy-makers to more formally set out their intentions with regard to stakeholder involvement at the local level within Statements of Community Involvement (SCIs). Although a formal SCI was not a requirement of the RSS preparation process in the North West, the approach adopted was explained in RSS documentation, including a Pre-Submission Statement.

On a positive note, the requirement for planning authorities to produce SCIs has helped to concentrate the thoughts of local planning authorities’ on how they might carry out more effective consultation and stakeholder involvement and, in the first two or three years of the reformed system, many local authorities did prepare an SCI that was subsequently declared ‘sound’ by the Planning Inspectorateⁱⁱⁱ. There is also evidence that consultation and engagement is often starting earlier in the process than previously (Brownill and Carpenter, 2007). However, many of the SCIs examined for this research were very broad and generic, used complicated terminology, were rather vague and generally did not effectively engage with the most significant challenges facing the involvement of stakeholders in the new system, including reaching out more effectively to hard to reach groups (e.g. Brewer and Alexander, 2007). Although the SCI process was initially subject to a formal and time consuming process of independent examination (now removed under more recent attempts to streamline the system)

evidence from the SPiP research suggests that the SCI process is not really working in terms of developing innovative practices (also see Brewer and Alexander, 2007). This reflects the fact that the absence of more sophisticated performance reviews and monitoring mechanisms for stakeholder engagement has meant that local authorities all too often merely paid lip-service to involvement; ticking the right boxes in terms of LDF preparation requirements but not fully embracing the spirit of the 2004 reforms (Brownill and Carpenter, 2007).

The findings of the SPiP study also suggested that the preparation, and subsequent consultation, on SCIs were not being used as constructively as they might be in promoting engagement in their own right. Advocates of collaborative planning have long emphasised the need to broaden the knowledge base for planning by harnessing the diverse experiences of stakeholders outside of traditional planning spheres (Forester, 1999). Brand and Gaffkin (2007: 290) note that, in the context of the collaborative planning tradition, in order for this to occur decisions need to emerge from inclusive and open dialogue between stakeholders who are equally informed, consulted, and respected rather than decisions being imposed from a top-down, pre-determined policy position. As such, collaborative planning stresses the value of participatory, as opposed to representational, forms of governance as the medium through which to facilitate the development of plans and policies *by* stakeholders in their role as policy ‘users’ (Brand and Gaffkin, 2007). The requirement to prepare an SCI itself presents an opportunity to engage and involve a wide range of stakeholders so that their ideas, perceptions and insights can influence subsequent approaches to engagement and involvement with the LDF (ODPM, 2005a). However, there was limited evidence that this was happening at the local level. Likewise, at the regional level, there was evidence that the NWRA had drawn on the experiences gained in the previous round of RPG preparation in the region, but it was not clear how involved key stakeholders had been in designing and influencing the approaches to be used in the new RSS process. What is apparent from the analysis is that the top-down approach adopted in the preparation of SCIs, which contrasts with the consensus building narrative of the collaborative planning tradition, has broadly failed to deliver the practical,

accessible and effective framework to support stakeholder involvement that was originally envisaged in the 2004 planning reforms.

Both the LDF and RSS studies identified a number of barriers that stakeholders commonly face in getting involved in the LDF or RSS processes. The findings demonstrate that these barriers fall into two main categories: procedural and structural. The former relates to the practice of spatial planning. Although some good practice examples were encountered at both the local and regional levels in terms of extending traditional methods of involvement and wider dissemination; the use of new technology to facilitate more effective involvement; introducing area or topic based discussion workshops or focus groups; and attempts to tailor approaches to particular stakeholder groups (including some defined as hard to reach), many local authorities lack the innovative thinking that is needed to improve collaboration between stakeholders. A common problem that was identified was the failure to appropriately differentiate between the approaches to involvement and engagement utilised at different stages in the plan-preparation process (Brownill and Carpenter, 2007). Likewise, there was inadequate differentiation between the approaches used to engage different stakeholder groups. However, arguably more problematic was the fact that many local authorities continued to adopt tried and tested approaches and methods for involving stakeholders even if they were inappropriate and had failed to deliver in the past. The evidence suggests that a significant number of local authorities were unwilling to shift away from these traditional methods even though many also admitted that they had found it difficult to engage with local communities and ‘smaller’ stakeholders (Baker *et al*, 2003).

Statutory consultees tend to respond more fully to a range of consultation methods largely as a result of their familiarity with the process as well as being actively informed of consultation exercises by planning authorities. In contrast, ‘smaller’ consultees, including community groups, parish councils, and hard to reach stakeholders, are falling through the net because of poorly executed consultation exercises and inadequate communication. In order to reach out beyond the statutory consultees and ‘usual suspects’, more effort is required to tailor approaches to fit the needs of particular groups (Bailey and

Peel, 2002). This could, for example, involve the targeting of specific groups that do not usually get involved in the planning process by offering specific events, meetings, and locations that different types of stakeholders are comfortable with, rather than simply using a broad brush approach to involvement (Beebeejaun, 2004; Frank, 2006). This issue was reflected at both scales of intervention. However, the problem of identifying and involving stakeholders, particularly non-statutory stakeholders and community groups, and sustaining their involvement throughout the consultation process, was much more pronounced at regional level. The lack of democratic accountability and the perceived 'invisibility' of regional planning bodies in the lives of citizens (see Pearce and Ayres, 2007), particularly from a community level perspective, have clearly inhibited the capacity for the regional planning body to involve a broad range of stakeholders in the way that some local authorities have.

The findings of both studies illustrate that participation in plan-making is also being inhibited by the sheer volume of consultation required under the new system. Consultation fatigue has emerged as a real barrier even to groups that started out with good will and enthusiasm (Lucas and Fuller, 2005). Thus, where appropriate, encouragement of joint working and partnership between stakeholders sharing broadly similar viewpoints might help spread the load and reduce fatigue (Healey, 1998). However, this is dependent on improvements being made in the way that local authorities identify and target stakeholders for consultation.

In addition to procedural issues, the new spatial planning system has introduced a number of structural barriers to involvement. A fundamental barrier to stakeholder involvement is a lack of understanding of the spatial planning process itself – and why it might be of importance – amongst potential stakeholders and local communities. The lack of knowledge of what the purpose of the RSS amongst several interviewees was particularly striking, but there was plenty of evidence that non-planners often lack (or perceive that they lack) sufficient knowledge of spatial planning issues and processes to get involved in an effective manner at local or regional scales. Technical jargon and over-lengthy and complicated LDF and RSS documentation was seen as off-putting by many interviewees in

both the SPiP and RSS studies. Undoubtedly such issues exacerbate the problems associated with involving stakeholders but are only likely to be lessened by concerted effort at all levels – including central government – to explain, educate and generally encourage ‘culture change’ amongst all those with potential interests in (or those who may be affected by) spatial planning decisions (Shaw and Lord, 2007). A number of interviewees also identified continued ‘silo’ thinking on the part of local authorities as a real structural barrier to involvement. In delivering a ‘culture change’ in the way that spatial planning is practiced, it is likely that the ‘silo’ mentality of many local authorities will be one of the most difficult challenges to overcome.

In addition, a simple lack of resources - both financial and in terms of time/adequate staffing - has been clearly identified as a fundamental structural barrier in these studies and elsewhere (e.g. Amos, 2004). This has inhibited the delivery of spatial plans and policies since 2004 and has impacted on the capacity of planning authorities to train practicing planners in the ‘art’ of spatial planning (Baker and Hincks, 2009). Where resources can be found, more specific training of staff in up-to-date consultation and engagement methods and techniques; working with dedicated organisations engaged in facilitating stakeholder and community involvement; and supplementing normal planning officer staff with dedicated consultation officer(s) can help focus on creating the right environment to encourage greater participation (Involve, 2005). Enhanced linkages also need to be made with the wider (and often higher profile) corporate activities of the local authority or regional assembly so that spatial planning, and its significance, is promoted as widely as possible.

The study also demonstrates that too many potential stakeholders and consultees are primarily reactive rather than strategic in their inputs. ‘Front-loading’ as a whole appears to be facilitating the engagement of some stakeholders earlier in the process than previously, but there is evidence from both the LDF and RSS surveys that these tend to be ‘statutory’ stakeholders or those previously engaged in policy-making. In contrast, evidence of attracting previously uninvolved stakeholders, and of maintaining their involvement throughout the process, was minimal. This problem of engaging

stakeholders beyond those already active in the plan-making process was also encountered in the 'old' land-use planning system (Bailey and Peel, 2002), suggesting a lack of substantive progression under the new system. Certainly, the evidence suggests that 'hard to reach' groups are likely to continued to be marginalised if local authorities and others fail to innovate and instead stick to traditional consultation techniques that have repeated be shown to fail in this respect (Beebeejaun, 2004; Frank, 2006).

Alongside the often identified 'hard to reach groups', particular problems appear to be faced when engaging developers and the business sector. There is evidence that these sectors are particularly disengaged during the earlier stages of the plan-making process but that they tend become more involved, often in a hostile or opposition role, when the implications of strategic policy are translated down to that of individual sites (Townsend and Tully, 2004). This has resulted in slippage in the adoption and implementation of many plans, particularly at the LDF level, which is a concern given that the reform of the planning system in 2004 was motivated in part by the need to improve the responsiveness of planning to meet economic development and housing requirements (CBI-TUC, 2001; Barker, 2004).

A key message emerging from the stakeholder interviews was that strong collaborative relationships take time to develop (Healey, 1997) and that there needs to be a concerted effort to (re-) build levels of trust between stakeholders (Tait and Swain, 2007). It was acknowledged by planning authorities that the 'pressure is on' to develop and adopt new style plans quickly but that negotiation and renegotiation was hindering plan-making. The problem seems to be that planning authorities initially underestimated the difficulties associated with collaboration. However, as the culture of consultation has become more embedded in the practice of spatial planning, more progressive planning authorities have come to acknowledge that a strategy of collaboration dealing initially with less threatening issues, progressing eventually to more contentious topics when trust or at least understanding between stakeholders has developed, is a useful practice to adopt. More generally, attempts need to be made to explore and utilise techniques that require the least effort on behalf of the sectors being targeted for

involvement (Petts and Leach, 2001) such as attending regular meetings of stakeholders rather than setting up additional events at inconvenient times (Involve, 2005). Ultimately, this reflects the need to overcome current perceptions (rightly or wrongly) about which groups hold the power and influence on the eventual outcomes of consultation exercises if a wider range of groups and stakeholders are going to be willing or motivated to get involved (see Brownill and Carpenter, 2007).

Within the context of the 2004 spatial planning reforms in England, this paper has drawn on the findings of two separate research projects examining participation and stakeholder involvement at the two different spatial scales of regional (RSS) and local (LDF) spatial planning in England. Drawing on this empirical base, current experiences of participation and stakeholder involvement at the local and regional levels in England were examined in order to assess the extent to which the 2004 reforms are leading to a more inclusive and 'stakeholder informed' plan-making process; the barriers facing stakeholders in getting involved in the LDF and RSS processes; and what might be done to enhance stakeholder involvement in future LDF and RSS processes. The findings were mixed, with some evidence of earlier, more widespread and more innovative forms of involvement than commonly seen before the 2004 reforms. However, there was a disappointing lack of innovation and, ultimately, overwhelming evidence that much more action is needed – from more detailed care in drafting spatial planning documents and designing consultation exercises to much wider aspects of culture change and education – if the aspirations of the reformed spatial planning system, in terms of participation and stakeholder and community involvement, are to be fully realised. The planning system continues to evolve, with the introduction of new forms of integrated regional strategies and revised national policy statements and the promise of more fundamental reform if the Conservatives win the next general election. However, understanding the needs of a wide range of stakeholders will remain important irrespective of any such procedural changes. Indeed, issues relating to community and stakeholder involvement and broader concerns relating to the democratic accountability of policy development and decision-making in the spatial planning field are likely to be heightened by the continued emphasis on

collaborative and partnership approaches, since this inevitably raises issues around which groups / organisations are included in the any partnerships and which are excluded. The research reported here revealed quite high levels of disaffection and exclusion felt by many smaller and community-based groups in particular. Increasingly complex LDF and RS processes, alongside new decision-making mechanisms such as the Infrastructure Planning Commission (IPC) which would appear to remove existing rights to participate in some project level planning decisions, are likely to exacerbate these feelings of alienation and exclusion from statutory planning processes. But a failure to achieve the heightened expectations of community and broad stakeholder engagement threatens to undermine the whole spatial planning reform process. It is hoped that, in its analysis and recommendations, this paper and the studies from which it is derived might play some useful part in addressing these challenges.

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Notes

ⁱ Further information on the SPiP Study and its methodology can be found via the various outputs of the research (e.g. CLG, 2008a; 2008c), available via the CLG website (www.communities.gov.uk/planningandbuilding/planning/regionallocal/).

ⁱⁱ On first impressions the response rate to the RSS survey may seem low. However, there is reason to suppose this is more representative than it might first appear. The list of 2618 addresses was previously used by the NWRA for the consultation on the submitted draft RSS document. In response to the NWRA consultation, only 182 people submitted comments (a response rate of 6.4%). Of the 182 people who responded to the NWRA consultation, 60 people responded to this survey, making the response rate of this survey equivalent to around a third (33%) of those originally involved in the RSS process. Additionally, responses were received from a further 42 people who had not taken part in the original RSS consultation. These responses, many of which represented neighbourhood groups and/or parish councils, were extremely useful in highlighting some of the difficulties and barriers faced by some of the smaller and more locally based groups or organisations in getting involved in the original consultation exercise.

ⁱⁱⁱ The test of soundness is a measure of the robustness of the plan or policy. To be "sound" a DPD should be *Justified*, *Effective* and *Consistent* with national policy. To be "Justified" the document must be: founded on a robust and credible evidence base; and the most appropriate strategy when considered against the reasonable alternatives. To be "Effective" the document must be: deliverable; flexible; and able to be monitored (see CLG, 2008b: paras 4.36 – 4.38 and 4.44 – 4.47 for a more detailed explanation).