



**TOWER 2, LEVEL 23
DARLING PARK, 201 SUSSEX ST
SYDNEY NSW 2000**

URBIS.COM.AU
Urbis Pty Ltd
ABN 50 105 256 228

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Department of Planning and Environment
320 Pitt Street
Sydney NSW 2000

SUBMISSION ON COMMUNITY PARTICIPATION PLAN EXHIBITION DRAFT

Thank you for the opportunity to provide a submission on the Department's Community Participation Plan Exhibition Draft October 2018 (Draft CPP).

Urbis is a leading national urban planning and professional services consulting firm with a strong reputation for excellence in shaping urban projects and policy at a state and national level. As the premier consulting firm in planning and stakeholder engagement, Urbis welcomes any new practices and policies that increase transparency and inclusiveness in the NSW planning system.

Urbis commends the Department on the release of its Draft CPP. The policy both clearly articulates the Department's commitment and approach to community participation and provides a leading guide for other planning authorities in the forthcoming preparation of their own Community Participation Plans.

We consider the Draft CPP to contribute positively to the Department's approach to evidence-based planning, which promotes informed decision-making and supports increased transparency and certainty for communities and proponents alike.

Urbis understands that the Draft CPP has been written for a general audience and we note the concise nature of the document and effective use of plain English.

We understand that an overriding objective of the Draft CPP is to make clear to the community when and how they can raise their voice on planning decisions. Therefore, we believe there are some critical concepts in the Draft CPP which warrant further exploration. We provide the following constructive feedback aimed at improving the understanding of the Draft CPP for the community and all users.

STRENGTHENING EARLY ENGAGEMENT

The Secretary's foreword and the community participation objective of "Timeliness" (p.9) emphasise the importance of early engagement with communities to build trust in the planning system.

However, the Draft CPP provides little by way of guidance to communities on the specific points in the planning process at which they can expect to be engaged. Moreover, much of the Draft CPP focuses on engagement during the public exhibition phase of a proposal, well along the planning process.

We encourage the Department to add more specificity to options for early engagement. This would preferably occur prior to:

- The lodgement and assessment of plans or development applications, or
- The exhibition of legislative, regulatory and policy instruments that shape the planning system.

Urbis notes that the Department is leading by example by encouraging the early engagement as part of the forthcoming scoping requirements for State Significant Development (SSD). We urge the Department to use the opportunity afforded by Draft CPP to provide practical guidance on how to engage early across its plan making and regulatory framework and policy functions, as well as in development assessments.

We suggest the insertion of a process flowchart, showing early engagement opportunities is essential.

STRENGTHENING RELEVANT AND MEANINGFUL ENGAGEMENT

The Draft CPP emphasises the importance of "relevant" and "meaningful engagement (p.9) and provides clarity to members of the community on the scope and purpose of engagement.

We encourage the Department to strengthen this point with reference to industry best practice standards, including the International Association of Public Participation (IAP2) public participation spectrum, which clearly articulates the purpose of engagement from a level of "inform" to "empower".

In addition, we believe the Draft CPP should encourage relevant planning authorities to clearly identify the aspects of a proposal that are negotiable and non-negotiable. In this way, members of the community will be aware of their influence over outcomes, making engagement both relevant and meaningful.

The inclusion of the IAP2 public participation spectrum and a case study of engagement that clearly articulates negotiable and non-negotiable aspects of a decision are two simple and effective ways to provide this information to those utilising the Draft CPP.

CONCLUSION

Urbis commends the Department for the work undertaken and the opportunity to contribute our feedback on the Draft CPP. We look forward to your review of this submission and incorporation of our suggestions into the final CPP.

Urbis would be happy to provide the Department any assistance to ensure the successful implementation of this important initiative.

Please do not hesitate to contact me on dknott@urbis.com.au or 0401 456 656 should you require clarification on our submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Dianne Knott", with a large, stylized loop at the end.

Dianne Knott

Director, Engagement