

Searle & Associates

Social Impact Assessment ● Community & Stakeholder Engagement

18 December 2018

Submission

To: NSW Department of Planning & Environment

Via *planning.nsw.gov.au*

Dear Sir/Madam,

Re: Draft Community Participation Plan

I am the Director of a consulting company that undertakes Social Impact Assessments and Community & Stakeholder Engagement, with experience in Australia and the UK.

I would like to offer some comments on the draft Community Participation Plan for your consideration. It is my view that the draft plan encapsulates traditional consultation practice, as reflected in Table 3, page 10, rather than promoting best practice in modern community participation. Simply informing the public of a proposal and inviting feedback – even one with an interactive exhibition format - is not ‘participation’, it is consultation.

I note that there is no reference in the draft Plan to accepted industry standards such as those set by the International Association for Public Participation (IAP2).

The Community Participation Plan is an opportunity to drive up standards in engagement practice, which in Australia in my experience is somewhat behind the standards set by the UK, Canada, Scandinavia, and other world leaders in the field of public participation and co-design. I would like to see the NSW Government take a more ambitious approach to set standards for the industry. This should include examples and case studies of best practice at the ‘participation’ end of the IAP2 Spectrum (Involve; Collaborate; Empower). For examples of the types of formats this can include, see Canada’s Matrix of Public Participation Activities and Techniques at <https://www.canada.ca/en/environmental-assessment-agency/services/policy-guidance/public-participation-guide.html#anna> with particular reference to sub-Annexes A1-A4.

I have spent more than 15 years in the UK developing approaches to community participation which have come to be known as ‘co-design’ or ‘co-production’. These approaches have been legislated in the UK, and regulations now require the public sector (local governments being the largest urban regeneration proponents) to evidence how communities have participated in the development of proposals and

their underlying strategies, plans and policies, not just inviting feedback on proposals or options. This approach treats local communities as equal partners in public sector service design, urban design and community development. In my experience, this approach makes a substantial contribution to repairing the mistrust and loss of respect that has built up between communities and government/private sector developers through years of not feeling listened to.

From my experience in Australia and the UK, I would suggest the following principles are key to effective community participation policy:

1. Community participation should start with local and regional plans, strategies and policies, so that the community's aspirations, strengths, interests and values can have real influence in community development. Then proponents are less likely to invest in the development of proposals which do not have the support of the community, as well as being able to explicitly address how the proposal will make a meaningful contribution to the development of the community, in its most holistic sense.
2. Major development projects should engage the community before there is a proposal to be consulted on, so that the community has real opportunity to influence the development of the proposal, and to define its benefits to the affected community or communities. Being presented with a concrete proposal, or even a small number of options, tends to be perceived by communities as a 'done deal', and doesn't foster a sense of community 'ownership' or pride in the development.
3. Engagement on major projects should be carried out by engagement professionals with appropriate training in social science methodologies such as grounded theory, using innovative engagement strategies and qualitative and quantitative analysis to accurately analyse and represent community opinion and make professional recommendations for community capacity-building and benefits realisation. Significant planning decisions shouldn't be made on the basis of a paragraph in a development application that summarises the proponent's view of the feedback. The Community Participation Plan should set minimum standards of reporting.
4. Based on points 2 and 3, I would suggest that the Community Participation Plan define different levels of engagement for different scale/type of project, based on the IAP2 Participation Spectrum (Inform; Consult; Involve; Collaborate; Empower). For example, small-scale residential planning applications may only require 'inform' and 'consult'; whilst larger urban development projects may require 'involve'; and projects of state significance or public sector projects may require 'collaborate' and/or 'empower', depending upon the type of project. These should be minimum requirements, with larger proponents encouraged to implement the full spectrum (as well as formal Social Impact Assessments), and these initiatives rewarded and promoted as best practice.

5. Where major projects are likely to disproportionately affect indigenous or minority ethnic groups or specific, vulnerable sectors (eg. Small business owners; unemployed youth; disabled people) specific engagement strategies should be developed by professionals with appropriate training to maximise the participation, capacity-building and benefits realisation to these groups.
6. Finally, the Community Participation Plan should clearly establish the Department's leadership and vision for what thriving community participation looks like, including case studies that help proponents see what can be achieved by working in partnership with communities.

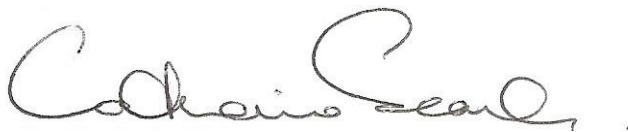
Case Studies

<https://www.local.gov.uk/developing-cultural-strategy-through-co-production-model-leeds-city-council>

<https://www.local.gov.uk/case-study-lochside-neighbourhood-group>

See attached, my own case study from the London Borough of Camden

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Catherine Searle', followed by a period.

Catherine Searle

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