

Department of Planning & Environment
GPO Box 39, Sydney NSW 2001
c/- Deputy Secretary, Policy and Strategy

Dear Ms Frame

Thank you for the opportunity to make a submission on the Department of Planning & Environments' Community Participation Plan (CPP) - Exhibition Draft October 2018.

Northern Beaches Council strongly supports community participation and engagement in reaching best practice planning outcomes. Identifying the ideal way of achieving this is a complex task and requires adaptive and flexible processes to ensure engagement is, and remains, open and accessible to everyone.

The community participation (engagement) industry is continually evolving with new tools and techniques being incorporated into good practice methodologies over time. Given this, it is more important than ever that a CPP is nimble and agile to manage changing citizen's expectations and channels in which we engage them through.

Engagement in the planning space is increasingly important to the Northern Beaches community. The Northern Beaches Community Satisfaction Research July 2018 highlights that managing development and other planning matters are of high importance to our community.

We have also identified there is often some confusion in our community as to the roles and responsibilities of the different levels of government in relation to planning matters.

Projects including Frenchs Forest, Ingleside Precinct and Beaches Link Tunnel have been recent examples that have highlighted the importance of collaboration and coordination on major projects at the early stages of the project planning lifecycle.

The following comments have been collated below to assist in the finalisation of your CPP:

Community Participation Objectives

The Community Participation Objectives and Actions identified in Table 2 of the draft CPP provides mainly high-level actions that don't specifically address how the Department intend to make community participation open and inclusive, easy, relevant, timely, and meaningful.

It would be beneficial to see more practical and measurable actions including more detail on how individual actions will achieve the associated objectives. To highlight just one example, how does the Department propose to build strong partnerships with the community into the future and how will this specifically make participation more open and inclusive? How will this be monitored and improved on over time?

Moreover, it would be advantageous to understand the process and criteria for determining how the selection of actions and activities will be applied to future Community Engagement Plans.

Incorporating Social Justice Principles into the CPP objectives may also be a way to expand on how the Department expects their approach to contribute to the decrease or eliminate inequity, promote inclusiveness of diversity and establish environments that are more supportive of all people. This would further emphasise a strong commitment to the values of community participation.

Community Participation Approach

Firstly, the lineal nature of a 'levelled' approach to participation does not accurately reflect the practicalities of engagement.

It would be of greater benefit to see specifically how the Department intends to identify how it will determine the levels of engagement at an individual project level.

An engagement approach should be relevant to the nature and scale of a project or proposal. Each engagement project should have a bespoke set of requirements that influence the design of the engagement plan and the way in which project outcomes will be delivered.

A Community (and Stakeholder) Engagement Plan should be developed for defined projects to identify the way in which the Department intends to communicate and engage with the community and stakeholders in relation to that project.

The CPP should focus more aptly on this including a detailed description that highlights how and when a Community Engagement Plan is developed during a planning process and what it should encompass.

Based on the IAP2 *Quality Assurance Standard for Community and Stakeholder Engagement*, an engagement plan should contain:

- A Purpose and Objective Statement including scope of works.
- The tools and techniques to be employed for engaging the community.
- A schedule of activities.
- Resources required and access paths to these resources.
- Risk management plan that identifies risks and barriers to execution of the engagement plan and accompanying mitigation measures.
- Budget.
- Roles and responsibilities of the project team.
- Communication strategy and reporting mechanism, evaluation points and techniques to be employed/evidence to be gathered.
- A demonstration of commitment to engaging with community/stakeholders in accordance with the IAP2 Public Participation Spectrum and Core Values stated in sections 2.1 and 3.1 respectively.

The execution of the plan should demonstrate creativity and ensure methods of engagement are fit-for-purpose and suitably adaptable to respond to changing dynamics amongst different audiences.

Through this approach, Department staff would be able to determine the most appropriate levels of engagement based on an assessment of the nature and complexity of each project.

Best practice engagement principles

The draft CPP identifies the aspiration to obtain best practice engagement principles, however, the approach provided does not strictly align with that of the International Industry Body – International Association of Public Participation (IAP2). Specifically, the IAP2 Public Participation Spectrum identifies 'collaborate' and 'empower' as separate components of an engagement approach.

While noted that many state planning projects (as a whole) do not lend themselves to independent 'empower' processes, it could be argued that collaboration with the community and stakeholders is still possible.

The 'Collaborate' phase of the spectrum offers approaches to engagement that we believe would be achievable for the Department, particularly opportunities to partner and collaborate on high impact projects with local government.

It would remiss of a CPP not to at least establish some basic guidelines around when and how collaborative approaches could be potentially utilised.

Further, it would provide greater clarity if the CPP provided more specific detail on when and how the Department specifically intends to identify partnering opportunities to more closely work with local governments on major projects into the future.

Accessible and enable diverse styles of participation

While the aspiration to increase community participation in planning systems is commendable, there are no clear benchmarks stated in the draft CPP that would allow the Department to measure success in this area.

It is important that specific objectives and targets underpin these aspirations. The CPP would benefit from reflecting on how the Department is planning on achieving, measuring and continually improving on their commitment to increasing community participation in planning systems.

A key part of gaining the participation of the community – and looking to grow that community involvement – is to effectively communicate and receive information in diverse ways, using a range of different channels.

The Departments' draft CPP focuses heavily on the public exhibition of draft documents as the key engagement tool that will be used across all projects.

While appreciating a public exhibition is a simple and relatively effective way to consult on draft documents, the approach alone does not adequately reflect a diverse approach to community engagement.

Based on good practice approaches, a public exhibition of a draft document should be held at the later stage of engagement and aimed at refinement rather than the main tool to seek community input. It is critical that the CPP identifies the opportunities that community members and stakeholder will have to engage prior to the publication and release of a physical document.

To name a few, this may include such things as key stakeholder workshops, stakeholder and community reference/advisory groups and focus groups with random and representatively selected community members to test concepts, ideas and language.

Exhibition timeframes

It is a positive step to have formal minimum exhibition timeframes, however, there will be scenarios where expanded exhibition timeframes are needed due to high impact, sensitivity, complexity or other matters of additional public interest.

While the draft CPP identifies that discretionary decisions based on urgency, sensitivity, scale and nature of proposal can be made, it would be useful for the CPP to elaborate on the specific scenarios and situations that would lead to their application and clearly state the conditions when this would not be appropriate (e.g. due to poor planning and management of a project by the Department or others). We believe criteria and principles needs to be identified to provide specific guidance for when these minimum times can, or should, be exceeded.

This also applies to non-mandatory exhibition timeframes. In particular, the use of the word "discretionary based on urgency, scale and nature of the proposal" for SEPPs is ambiguous and does not provide sufficient transparency to identify when and how these discretionary powers can, or will, be used.

Beyond minimum timeframes, establishing these engagement opportunities at the correct time can be critical in community members receiving the right information at the right time – too early may mean participants are not equipped with enough context and too late may not allow for effective contribution.

Identifying the 'earliest possible opportunity' is admirable in its intent, however, lacks a clear definition of exactly when this is. This will likely lead to ambiguity and uncertainty within the broader community – and potentially a loss of public trust.

Similarly, not providing a criteria or measure around what constitutes 'earliest possible opportunity' will make it difficult for the Department to measure and improve on. For example, how would engagement started as 'early as possible' be evaluated?

Also, in some cases early community participation is not suitable - particularly in cases that may require in-depth research or forward educational and behavioural change programs. It is suggested that engagement should commence at the most appropriate time based on a risks and opportunities assessment, which again, should be detailed within the individual project Community Engagement Plan.

Thank you again for the opportunity to provide comment and I hope we can continue to work together to get better engagement and planning outcomes into the future.

I am available to continue to work with your team to assist in the next steps of this process.

Yours sincerely,

Andrew Grocott
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Northern Beaches Council