

# Pre Application Engagement – A guide to best practice

## 1 Introduction

*Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.*

National Planning Policy Framework

Leeds City Council considers that pre-application involvement with communities and ward members is an important part of the development process and is especially valuable where it has been undertaken at an early stage. It can lead to more successful developments in a timely way and has benefits for all parties:-

### Developers

- It can provide more certainty in the process and helps avoid unforeseen issues arising
- Gain invaluable local knowledge to help shape the proposal
- Prevents inaccurate information about a development circulating
- It enables the development to evolve to become a scheme with local support thereby reducing the potential for refusal or delay
- There is less potential for recourse to the appeals procedure (delay & cost)
- The subsequent development is more readily accepted by the community and meets their needs and aspirations

### Communities

- Engagement allows communities to help shape proposals in a way that meets the needs and aspirations of the area and addresses the impact of a proposal
- It provides an opportunity to understand what is being proposed
- It provides a way of helping to address community needs and aspirations

Good community consultation allows views to be sought early on when there is scope for influencing proposals in response to the views expressed. Poor or rushed consultation may frustrate communities, increasing the number of objections and creating the potential for delay in determining the application which can ultimately lead to an appeal.

The Government has clearly signalled the importance of community involvement at the earliest of stages of an application with its intention to make pre-application engagement a mandatory requirement on larger planning applications. The size thresholds are still to be set, but it is expected to cover developments:

- over 1 hectare; and / or
- 200 residential units; and / or
- 10,000 square metres of new floor space

The council promotes a collaborative approach to developing meaningful community engagement programmes, which utilises ward members' expertise and local knowledge about the area and local communities, together with the views of Town and Parish Councils and community groups as appropriate. Therefore the starting point is to contact planning services, who will arrange ward member involvement at an early stage and through discussions, will provide assistance and advice on the timing, level and amount of engagement required for particular schemes

The Leeds Statement of Community Involvement asks for community involvement to take place on all major applications. A major planning application is defined as<sup>1</sup> :

- *Residential developments (including houses and flats) of 10 units or more on a site of 0.5 ha or more those of 10 or more residential dwellings*
- any development (including change of use) with a gross floor area of 1,000m<sup>2</sup> or more or a site area of 1 ha or more
- minerals applications (winning or working of minerals or the use of land for mineral working deposits)
- waste development (for the purposes of community involvement, only larger waste developments would fall into this category)

We also strongly encourage community involvement on all applications, irrespective of their size or scale, which are likely to be sensitive, have significant impact or likely to be of significant public interest.

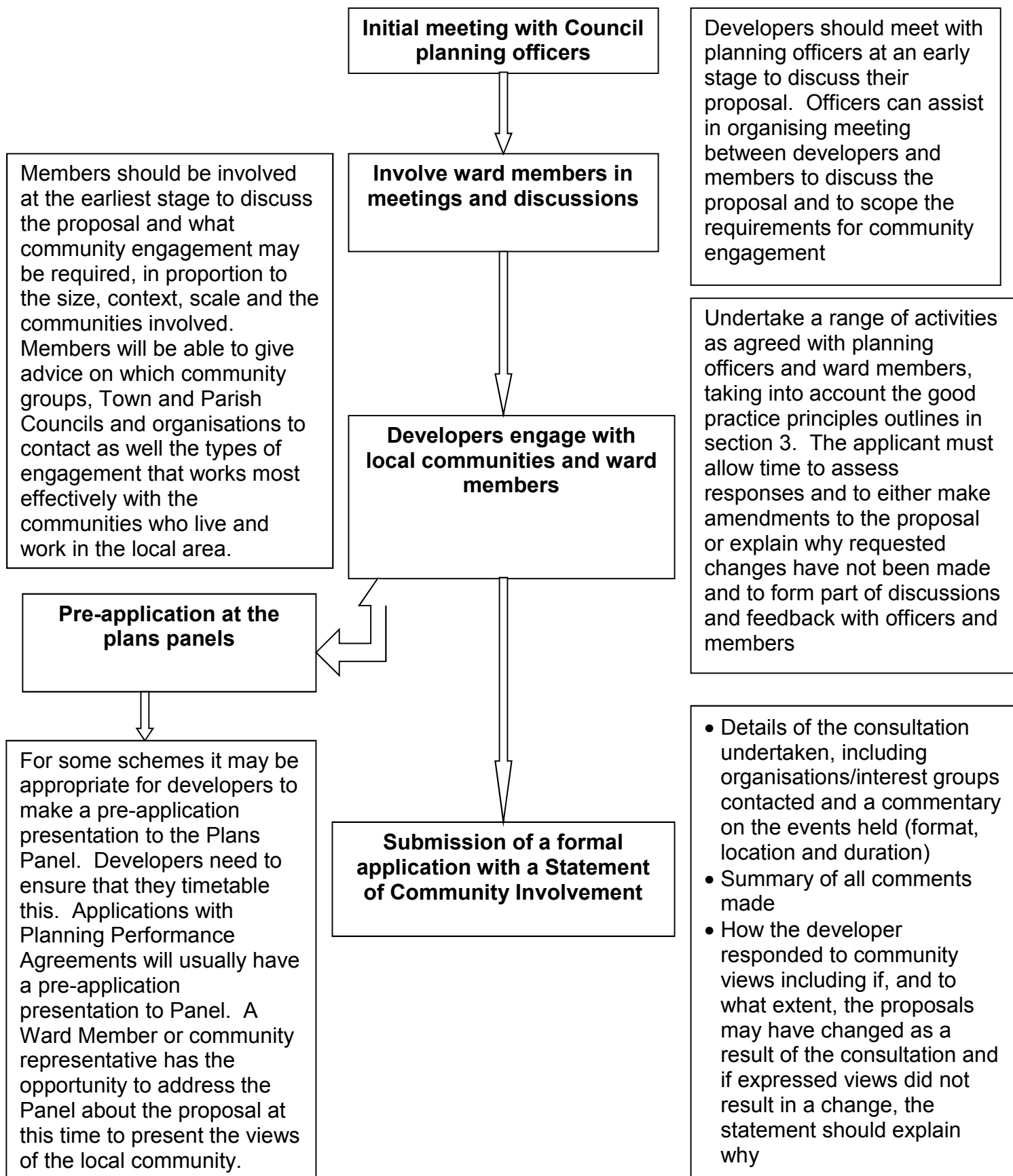
We recognise that any community involvement should be appropriate to the scale, context and complexity of the proposal. Equally the time spent and the resources used in consultation should be in proportion to the size and / or the impact of the proposed development.

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<sup>1</sup> Town and Country Planning (Development Management Procedure) (England) Order 2010

## 2 Pre-application process

The chart below shows the steps that should be followed in the pre-application process.



### **3 Principles of good engagement**

Just as every proposed development is unique, the type, form and level of community involvement will be different, depending on the context of the site, the nature of the development, the communities involved and the likely impact of the development. However, there are some guiding principles to ensure that engagement is as effective and meaningful as possible.

#### **Timeliness**

Any community involvement should begin at an early stage, before a final scheme has been prepared, but at a point where there will be some clarity around the key planning and design issues. Realistic timescales are needed to ensure that involvement takes place when things can be influenced by the consultation.

There should be a clear published timetable for the consultation process so the community knows when there is the opportunity to participate. Sufficient time should also be allowed for considered and informed responses to the community's responses to be given by the developer, taking account of holiday periods.

#### **Transparency**

Developers need to be clear and up front with the community about the stage in the process that the development has reached and what constraints the development has which cannot be overcome. If there is no opportunity for changing a particular part of a proposal, then this needs to be made clear and the reasons provided.

Developers should provide feedback to the Town and Parish Councils, community groups and ward members following their responses and be able to demonstrate what changes have been made as a result of community comments. Where suggestions have not influenced the proposed development the developer should state why these suggestions have not led to a change.

#### **Understandable and inclusive**

Developers should recognise that communities have different needs and information should be relevant, accurate and understandable by the intended audience. Consideration should be given to alternate forms of communication, particularly where English is not the first language - information presented graphically and visually is often easier to understand than text. Developers should avoid jargon or technical terms; this can easily be a barrier to understanding.

Information needs to be clear so that the community have clarity about what they are being consulted on, what can be achieved, how they can participate and the timescales involved. Information that is unambiguous will help to dispel rumours and address local concerns head on.

The means of collecting community comments and responses should be set out and it should be stated clearly what will happen to such comments. Developers should allow responses to be made by a variety of means: letters, email, online and telephone as well as in person at public events.

For public events, venues should be within the locality, easy to find and to access and at times that allow interested parties to attend.

Developers should monitor and evaluate the engagement process on an ongoing basis to ensure that the consultation has received balanced and representative responses so that any unrepresented group can be specifically targeted if necessary.

#### 4 Approaches to community consultation

Every development, no matter how large or small, can benefit from effective engagement. Talking to a neighbour before submitting an application for a house extension, listening to any views they may express and responding to comments always helps. This applies equally to a new supermarket or major residential development. However, the approaches used, the time taken and the resources invested in consultation will be different, and should be in proportion to the size and impact of the development.

Developers need to be mindful that whilst the standard requirements identified below are appropriate in the majority of cases, a proposal may warrant more, or less community involvement depending on the development. Context is the key, a small development may have an impact on its immediate neighbours or community and therefore more engagement would be needed. Conversely, a large scale development may not have a significant impact and fewer consultation activities may be needed. Whatever community engagement takes place should be proportionate to the proposal and this decision will be reached in conjunction with the ward members, the developer and the planning officer.

##### Standard requirements

The council would expect developers to use some or all of the standard techniques, described in the next section, on proposals where there would be a low level of impact. Such schemes would require community engagement in proportion to the size, scale and context of the development. However, only informing the community about what is proposed is not sufficient as this is one way communication and adds little value in terms of communities having their say other than by objecting to the proposal.

As standard, the council expects at least:



This level of community involvement would be suitable for most smaller major schemes, as a guide, 10-199 residential, up to 9,999m<sup>2</sup> commercial, or larger majors where there is limited impact.

## **Additional engagement**

Additional requirements and more demanding engagement is required on schemes where there is significant impact on local communities and the area and where development takes place over an extended period of time. This type of engagement involves in depth collaboration at the earliest stage on the design and development of the proposed development. On very large or significant schemes, community forums may be set up which tap into local knowledge and networks and where a commitment to build up long lasting relationships with the community is made. High levels of commitment, time and resources are needed to make this approach meaningful, but the benefits are immeasurable in terms of community buy-in, reduced risk of challenge and delays.

The range of engagement activities would build upon the standard requirements, but depending on the impact and nature of the scheme would use additional methods. Developers, in conjunction with ward members and officers will reach agreement on the programme of community engagement, having assessed the impact of the scheme.

The Council would expect this approach in community-led proposals, on proposals where there will be a high level of community interest, large residential schemes of 200+ units, 10,000m<sup>2</sup>+ commercial or regeneration programmes.

## **Smaller schemes**

Smaller schemes such as a change of use or a householder application require community consultation and these are set out in legislation and require that neighbours are notified by the local authority once an application has been submitted. However, talking to neighbours and showing them the plans before an application is submitted will often save time, reduce risks and can result in a better scheme.

## **5 Examples**

- Community involvement in the early stages of the development has led to the creation of a community forum for the Kirkstall Forge site to provide regular updates throughout the life of the project. Progress is further promoted through exhibiting at local events and via local media and the Kirkstall Forge website.
- During a public exhibition event for a residential site, developers invited public opinions on the number of units and number of affordable homes and the materials with which to build the houses. In both cases, the scheme was amended to reflect the community's view.
- Pre-application involvement for a residential development in Woodlesford was heavily influenced by local residents and the desire by the landowner to develop the land sympathetically and over a longer period of time than would normally be expected. A collaborative approach was taken on the design, with community input on a design code which would fix the style of properties and limit the nature and extent of materials to be used.
- The Armley Forum is used as a way of reaching a large number of residents in that area through the discussion of applications as part of the general meeting. This

keeps ward members and the community up to date with what is going on, at very low cost and resource input.

- Large scale schemes such as the East Leeds Extension and Thorp Arch have set up community consultative forums to help shape the proposal and facilitate effective communication and engagement.

**For more advice**

Developers are encouraged in the first instance to contact planning services for advice and information on community engagement;

Development Enquiry Centre  
Leonardo Building  
Rossington Street  
Leeds  
LS2 8HD  
Telephone 0113 2224409