# DEMOS

## THE MIMBY MAJORITY HOW TO UNLOCK HOUSEBUILDING WITH EARLY AND REPRESENTATIVE PUBLIC PARTICIPATION IN PLANNING

MIRIAM LEVIN HANA KAPETANOVIC AIDAN GARNER

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#### Miriam Levin, Hana Kapetanovic and Aidan Garner

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## **ABOUT THIS REPORT**

Demos is on a mission to build a more collaborative democracy. One which enables politicians, policymakers, and experts from business, civil society, academia, and the public to work in partnership to understand and tackle the massive challenges facing our country.

The scale of the challenges – from the cost-of-living crisis, to the emergency crisis and our crumbling public services – demands that politicians make hard choices, brave choices, that tackle the issues that matter to people and bridge divides rather than driving us apart. But the way policy is made usually swings from divisive and partisan, to technocratic and unresponsive to people's real lives.

As a result, citizens are divided, people feel powerless, policies focus on short term sticking plasters not long term change, and politicians aren't trusted to provide the solutions.

We need a collaborative democracy which puts people at the heart of policymaking. This will start to address these problems by creating policies that work for people, strengthening citizenry, and improving trust in the political system.

Demos works with politicians and policymakers to put people at the heart of policymaking using deliberative and participatory methods – from citizen assemblies to digital democracy. Demos's <u>Citizens' White Paper</u> last year set out how to embed public participation in national policymaking. We are now looking at how this can be put into practice in some of the most polarising or difficult issues of the day. This report sets out how to do so in strategic planning.

# EXECUTIVE SUMMARY

The Government has committed to delivering 1.5 million homes across England by 2029 to meet the housing crisis and to drive growth. In its bid to speed up the planning process and deliver new homes, the Government has promised to take on the 'NIMBYs', those who say 'Not in My Backyard' to new developments. Recent reforms to the planning process are in service to the need to accelerate developments. The Government's own assessment suggests the Planning and Infrastructure Bill could benefit the economy by £7.5 billion over the next decade.<sup>1</sup>

A central part of the planning reforms are Spatial Development Strategies (SDSs), which aim to unlock large-scale development by addressing housing needs across local authority boundaries, transport infrastructure, and land supply bottlenecks.<sup>2</sup> By the end of the Parliament, the Government wants the whole of England to be covered by strategic authorities and for each strategic authority to have developed an SDS – designed to bring coherence, speed, and certainty to a fragmented and highly localised planning system. The Planning and Infrastructure Bill sets out only the most minimal requirements for public consultation once the SDS is already drafted, less than is expected when Local Plans are prepared.

But our analysis suggests that the Government's anti-NIMBY narrative risks backfiring: the number of NIMBYs has been growing since the Government increased this rhetoric at the end of 2024. Polling carried out for this report suggests that the proportion of NIMBYs has significantly increased since then, potentially by as much as 31%, from 17.5%<sup>3</sup> to 23%,<sup>4</sup> when comparing our new polling to a poll conducted by Labour Together in September 2024. This poses a risk to the Government's ambitious housebuilding target and potentially their electoral strategy too if they face increasing local opposition.

This report makes the case that if the Government wants more homes to be built, and faster, it needs to work with communities more effectively. It has an opportunity with the new Spatial Development Strategies to get public participation right, hearing from people early on in the process and ensuring that a representative cross-section of the community is involved.

We make the case that, far from slowing down planning, early and representative public participation can streamline the process by helping to anticipate issues earlier, de-risk later planning applications, and potentially speed up progress towards the 1.5m target. Hearing a wider range of views that better reflects the whole community will power up, rather than slow down, the housebuilding programme.

<sup>1</sup> https://www.gov.uk/government/news/reforms-to-get-britain-building-will-boost-economy-by-billions#:~:text=The%20Planning%20and%20 Infrastructure%20Bill's,over%20the%20next%2010%20years

<sup>2</sup> https://publications.parliament.uk/pa/bills/cbill/59-01/0196/240196.pdf

<sup>3</sup> https://www.labourtogether.uk/insights/britain-a-nation-of-mimbys

<sup>4</sup> Demos polling in April 2025: Nationally representative poll conducted 4th – 6th April 2025. Base: GB respondents (n=2018). N.B. While we replicated Labour Together's questions, we worked with a different polling company, limiting the direct comparability of the results. However, other polling evidence supports the rise in NIMBYism, as seen on page 16. See appendix for more detail on how NIMBYs, MIMBYs, and YIMBYs were classified.

Emerging evidence demonstrates this. Almost every developer and landowner interviewed for research by the Scottish Land Commission agreed that early engagement de-risks the development process by reducing objections, helps avoid time-consuming delays or controversies once a planning application has been submitted, and creates a stronger sense of community.<sup>5</sup> In Auckland, the involvement of residents, alongside local boards, Māori communities, and businesses, led to the "the fastest plan ever prepared in any city in the world" according to New Zealand's Local Government Minister. It contributed to a dramatic increase in housing delivery from 4,582 dwelling consents in 2012 to 21,307 in 2022.<sup>6</sup>

The Government's focus has been the NIMBYs, but polling conducted for this research shows that only 6% of people in England took the time to object to a planning application in the last year.<sup>7</sup> Even fewer – 3% – made a supportive statement to a planning application. The conversation is being dominated by less than 10% of the population. In contrast, over half (52%) admit not knowing how to take part in consultations about developments in their local area.

The conversation is being dominated by less than 10% of the population. In contrast, **OVER** half (52%) admit not knowing how to take part in consultations about developments in their local area.

While NIMBYs are the vocal minority most likely to take the time to have their say in the planning system, there is an unheard majority out there: our new polling finds that the majority of the population – 67% – are 'MIMBYs', people who say 'maybe' to development in their local area, depending on the scenario.<sup>8</sup>

Early and representative public participation will ensure that strategic authorities hear a more balanced and representative set of views on planning – giving a voice to the MIMBY majority as well as the NIMBYs and YIMBYs – so the plans better represent the whole community's wants and needs, including those currently least heard in the planning system such as young people and renters, and help to rebuild trust between residents and all tiers of government.

We are under no illusion that going beyond the minimum requirements for time- and cashstrapped strategic authorities is a big ask. But the benefits promise to outweigh the investment. Early and representative public participation in SDS preparation will mean:

 $<sup>5</sup> https://www.landcommission.gov.scot/downloads/5ee1fa960b190_20200611\%20SLC\%20REPORT\%20Value\%20of\%20Early\%20Engagement\%20in\%20Planning.pdf$ 

<sup>6</sup> https://www.stats.govt.nz/information-releases/building-consents-issued-december-2022/

<sup>7</sup> Nationally representative poll conducted 4th - 6th April 2025. Base: England respondents (n=1724).

<sup>8</sup> Nationally representative poll conducted 4th – 6th April 2025. Base: GB respondents (n=2018).

- 1. The planning process is smoother and speedier as objections to Local Plans and planning applications can be mitigated since issues will have been anticipated and resolved earlier, and the fact that the principle of development will already have been agreed by a wide cross-section of the community upstream during the SDS preparation and supported by evidence collected through this process
- 2. The SDS is more likely to pass the examination stage as the strategic authority will have identified and dealt with issues earlier on, and can more convincingly demonstrate that it has heard and considered a wide range of views
- 3. The risk of legal challenge (Judicial Review) is reduced a prominent concern for all public bodies particularly on the basis of lack of engagement, but also more broadly given public concerns can be addressed and dealt with earlier on
- 4. The SDS will be better able to withstand political change in the strategic authority by rooting it in what the public wants and needs, rather than it being associated with a particular political project and therefore at risk if the administration changes
- 5. Better policies will be designed that meet the needs and wants of the whole community as a representative cross-section will have been involved. Our research shows that residents will perceive the SDS developed in this way better represents the community
- 6. Increased trust between residents and the strategic authority as residents will feel that they have been listened to; new strategic authorities should take this opportunity to get off on the right foot with residents.

### SUMMARY OF OUR RECOMMENDATIONS

To embed early and representative public participation in the process of creating Spatial Development Strategies (SDSs), we recommend:

- 1. The Government should create secondary legislation for the Planning and Infrastructure Bill to set guidance and expectations for strategic authorities on early and representative public participation
- 2. Strategic authorities should proactively adopt meaningful public participation as part of their process that is both early and representative
- **3.** Strategic authorities should build an enabling culture for participation through training and a Community of Practice
- 4. Strategic authorities should evidence the public participation they have carried out in the final SDS that goes to Examination in Public
- 5. Government, strategic authorities, planning authorities and communities should collaborate on experimentation in delivery of participatory planning, and evaluation, to provide evidence that participation can speed up the planning process

### PUBLIC PARTICIPATION MODEL

To enable strategic authorities to put this in practice we have set out a Public Participation Model for meaningful but proportionate participation in SDSs.

The model is not intended to be prescriptive or one-size-fits-all. However, for strategic authorities looking for guidance on how to do this kind of participation, we have set out a practical, deliverable model, developed in collaboration with citizens, strategic authorities, and planning, housing, and participation experts.

### FIGURE 1

DIAGRAM SHOWING THE PUBLIC PARTICIPATION MODEL AGAINST THE STAGES OF SDS PREPARATION

	STAGE 1	STAGE 2	STAGE 3	STAGE 4	STAGE 5	STAGE 6
	Setting the parameters	Setting the vision	Setting the objectives	Writing the policy detail	Examination in public and finalising	Publication of SDS
What happens at this stage of SDS development	Setting parameters for the SDS by considering national legislation, policy and guidance, as well as the vision of elected politicians	Evidence gathering on strategic priorities to inform the vision	Translating the vision into objectives	Translating the objectives into the policy detail of the SDS and producing a draft	Examination in public: consulting on draft SDS, gathering evidence, and holding hearings. Finalising SDS in line with assessment	Publishing and rolling out the SDS - applies at strategic and local level
Participation level		Participation at scale	Participation in depth		Drawing on participation in depth	
How the public could participate in our model	This will provide clarity on parameters for public participation	Use digital technology to engage as widely as possible on the vision for the SDS	Set up a standing Citizens' Panel to develop citizen-led objectives for the SDS	Co-design the policy detail with the Citizens' Panel and experts	Citizens' Panel members to submit a representation on the draft SDS	Draw on community allies from the Citizens' Panel once the SDS is published

# INTRODUCTION

The UK's housing crisis requires urgent action if the country is to achieve affordable homes for citizens and the economic growth it desperately needs. This is widely recognised: there is cross-party consensus on the need to make significant progress on housebuilding. However, progress has not been made at the scale needed for decades. The 2010s had the fewest new houses built in England since the Second World War, continuing a 50-year trend of declining housebuilding rates each decade.<sup>9</sup>

The Labour Government has made planning reform one of its key policy agendas, pinning many of its hopes for economic growth on its target of 1.5 million new homes and nationally significant infrastructure. In its mission to speed up the process, the Government has promised to take on the small but vocal minority of 'NIMBYs' – those who say 'no' to housebuilding 'in my backyard'.<sup>10</sup>

This approach risks failure. Our research finds that since taking this approach, public opposition to housebuilding has grown, not fallen. The proportion of NIMBYs may have grown by as much as 31% since September 2024, from 17.5%<sup>11</sup> to 23%.<sup>12</sup> Simply sidelining the voices of NIMBYs could lead to hardened opposition at a local level, political dissatisfaction and legal challenge down the line. This is likely to get harder through the course of this Parliament in the lead up to the next general election, not easier.

This also plays into wider issues of frustration with democracy, the political system and declining standards of trust. Not feeling heard merely reinforces the public's lack of trust in politicians and the political system, which is at record low levels.<sup>13</sup> Instead, if the Government wants to meet its targets, it should work to engage the unheard majority, the 67% of people who are open to housebuilding under some scenarios, according to new polling for this research, the 'MIMBYs' – Maybe in My Backyards.<sup>14</sup>

Currently, over half (52%) of the population in England admit not knowing how to take part in consultations about developments in their local area.<sup>15</sup> Instead, we are hearing from a small minority of the population, with only 6% having objected to a planning application in the last year, and even fewer (3%) having made a supportive statement to a planning application.<sup>16</sup> Focusing on these voices is skewing our perception of what the public thinks about new developments in their backyard and beyond.

<sup>9</sup> https://cps.org.uk/media/post/2019/britain-set-for-worst-decade-of-housebuilding-since-ww2/

<sup>10</sup> https://metro.co.uk/2025/02/13/keir-starmer-take-nimbys-get-britain-building-22546316/

<sup>11</sup> https://www.labourtogether.uk/insights/britain-a-nation-of-mimbys

<sup>12</sup> Demos polling in April 2025: Nationally representative poll conducted 4th – 6th April 2025. Base: GB respondents (n=2018). N.B. While we replicated Labour Together's questions, we worked with a different polling company, limiting the direct comparability of the results. However, other polling evidence supports the rise in NIMBYism, as seen on page 16. See appendix for more detail on how NIMBYs, MIMBYs, and YIMBYs were classified.

<sup>13</sup> https://natcen.ac.uk/news/trust-and-confidence-britains-system-government-record-low

<sup>14</sup> Nationally representative poll conducted 4th – 6th April 2025. Base: GB respondents (n=2018)

<sup>15</sup> Nationally representative poll conducted 4th - 6th April 2025. Base: England respondents (n=1724)

<sup>16</sup> Nationally representative poll conducted 4th – 6th April 2025. Base: England respondents (n=1724).

Demos proposes that the Government enables the MIMBY majority voice to be heard through early and representative public participation in planning. By engaging with a representative cross-section of the public on planning – the MIMBYs, as well as NIMBYs and 'YIMBYs' (Yes in My Backyards) – we will hear a more balanced set of views on housebuilding, understanding where and when people are in favour of development. By engaging early, the public will have a real say in the preparation of plans, helping planning authorities to identify and remediate issues earlier, and ensure plans better meet the needs of residents. Creating this space for fair participation in the process could be part of renewing trust in government, not adding to the current climate of dissatisfaction.

This report specifically explores a new opportunity for public participation in the planning system – Spatial Development Strategies (SDSs). One of the key planning reforms in the new Planning & Infrastructure Bill is to introduce a sub-regional layer of strategic planning in order to streamline the planning process and enable strategically important housing and infrastructure to be planned across local authority boundaries. Strategic authorities, which will be made up of a number of local authorities working together and which the Government intends to eventually cover all of England, will be required to put together an SDS for the area that they cover. Currently, as we set out on page 24-5, the requirements for public engagement in the development of SDSs – as set out in the Planning and Infrastructure Bill – are minimal.

We have focused on strategic planning in this report as there's an opportunity here: as a newly introduced layer of planning, Spatial Development Strategies offer a blank canvas for existing combined authorities and new strategic authorities to work out how best to engage their residents in the process, unlike the tried and tested requirements for Local Plans and planning applications. The Planning and Infrastructure Bill sets out few requirements for public engagement, but we argue that this minimal approach is short-sighted, and likely to slow down the whole planning process rather than speed it up. There is an opportunity to refresh the approach to planning and build trust in the process and authorities from the start.

The MIMBY Majority makes the case for early and representative public participation upstream in the planning process – at the point when the long term strategy for the wider area is being considered. SDSs will set the parameters for where housing and infrastructure will go; guiding all the local planning policy that follows. Ensuring that a representative cross-section of the community has had a chance to shape the SDS will mean that later, local planning policies can progress more smoothly as the principle of development will have been set and supported by evidence collected through this process.

In this report, we make the case that if the Government wants to meet its housebuilding targets, creating places that meet the needs of current and future residents, we need to involve the public meaningfully in planning processes. Then we look more specifically at public participation in strategic planning, and demonstrate why early and representative public participation in the development of SDSs is crucial. We provide a short history of strategic planning in England, including ongoing reforms, and set out the current landscape in relation to public participation.

Next we draw on our fresh insights from new research with planning experts, strategic authorities<sup>17</sup> and the public to explore the barriers and enablers to making public participation in the development of SDSs a success. We set out recommendations to government, strategic authorities and the planning inspectorate on how to support these changes. Finally, we suggest a model for how strategic authorities can proactively undertake early and representative public participation in the development of their SDSs.

<sup>17</sup> N.B. For simplicity and brevity throughout the report, we use the term "strategic authorities" in the present tense to refer to the existing bodies – combined authorities and the Greater London Authority (GLA) – which will become strategic authorities when the legislation is passed.

# METHODOLOGY OVERVIEW

We combined desk research, expert and policymaker engagement, public deliberation, and nationally representative polling to develop and test our proposals for better public participation in strategic planning.

To ensure our findings and recommendations were as robust as possible, we spoke to representatives from nine existing combined / strategic authorities and numerous experts in housing, planning, and public participation from our excellent advisory group and beyond.

To ensure we meet the ultimate needs of citizens, we held deliberative Citizens' Conversations (see page 25-26 for more on deliberative methods) with residents from two combined authority areas (Liverpool City Region and West Midlands). We also commissioned nationally representative polling to quantify our findings and test our proposals.

The appendix provides more detail on our methodology, including the considerations we made to ensure our research met our diversity, inclusion, equity and justice standards, the stakeholders we engaged, how we conducted the Citizens' Conversations and a detailed breakdown of our nationally representative polling.

## **SECTION 1** CONTEXT: NIMBYS, YIMBYS, AND MIMBYS AND THE GOVERNMENT'S HOUSEBUILDING DRIVE

### THE GOVERNMENT HAS PUT HOUSEBUILDING AT THE CENTRE OF ITS OFFER TO CITIZENS AND PLANS TO ACHIEVE ECONOMIC GROWTH

The UK is in the grip of a profound housing crisis: for decades, not enough houses have been built to meet demand, resulting in a severe shortage of affordable homes, record homelessness levels, skyrocketing property prices and rents, and a lack of social housing. A growing gap between supply and demand is creating a market that is increasingly inaccessible to younger generations, with homeownership rates among 25-34-year-olds dropping from 67% in 1991<sup>18</sup> to just 39% in 2022.<sup>19</sup>

The housing crisis not only exacerbates social and economic inequalities, but hinders economic growth by constraining labour mobility, diverting investment, and hindering productivity.<sup>20</sup> Building houses contributes to a thriving construction industry, and boosts productivity and economic growth. This all makes tackling the housing crisis central to the Government's "number one mission" of economic growth.<sup>21</sup> The Government's own assessment suggests the Planning and Infrastructure Bill could benefit the economy by £7.5 billion over the next decade.<sup>22</sup>

One of Labour's headline commitments – both in its manifesto and since the election – is the promise to deliver 1.5 million new homes in England over the course of this Parliament. There is cross-party consensus on the need to build homes: the Conservative 2024 Manifesto pledged 1.6 million new homes in England over the course of the Parliament by fast tracking applications

housingandhomeownershipintheuk/2015-01-22

20 https://cep.lse.ac.uk/pubs/download/ea061.pdf

<sup>18</sup> https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/articles/

 $<sup>19 \</sup>quad https://ifs.org.uk/data-items/homeownership-rates-working-age-adults-age-group-1995-2022$ 

<sup>21</sup> https://www.gov.uk/missions/economic-growth#:~:text=Economic%20growth%20is%20the%20number,raise%20living%20standards%20 for%20everyone.

<sup>22</sup> https://www.gov.uk/government/news/reforms-to-get-britain-building-will-boost-economy-by-billions#:~:text=The%20Planning%20and%20 Infrastructure%20Bill's,over%20the%20next%2010%20years

through the planning system and delivering record numbers of homes on brownfield land;<sup>23</sup> the Liberal Democrat's promised 380,000 homes per year across the UK.<sup>24</sup>

The UK's persistent failure to deliver on housebuilding and infrastructure development is in part due to a planning system that is increasingly perceived as being riddled with inefficiencies, delays, and appeals that cause costs to spiral, with over £50 million of taxpayer money spent by local authorities on planning appeals according to the House Building Federation.<sup>25</sup>

As a result, the Government has set out a programme of planning reforms. Following the Chancellor's Spring Statement in March 2025, the Office for Budget Responsibility forecasts show that the Government's planning reforms will contribute to 0.2% of additional economic growth (approximately £6.8 billion) by 2029/30; this growth could further rise to over 0.4% by 2034/35, driven by higher construction productivity and long-term gains from improved labour mobility.<sup>26</sup>

### STRATEGIC PLANNING IS PART OF THE GOVERNMENT'S PLANS TO UNLOCK HOUSEBUILDING

As part of its planning reform agenda aimed at unlocking housebuilding, the Government is focusing on speeding up decision-making, including introducing a sub-regional layer of strategic planning.

Strategic authorities are new sub-regional government bodies across England, including the existing combined authorities, combined county authorities, the Greater London Authority, or (in their absence) upper-tier county councils or unitary authorities with the power to set strategic policies on housing numbers, infrastructure corridors, employment locations, and environmental priorities.<sup>27</sup> As set out in the Planning and Infrastructure Bill published in March 2025, they will be obliged to produce Spatial Development Strategies (SDSs). These will provide a plan for how land is used and developed over a longer period of time – typically at least 15 years – and across the entire strategic authority area, coordinating development for long-term growth and infrastructure planning, meeting community needs as well as national targets.<sup>28</sup>

Every part of England is to be covered by an SDS, which will provide strategic guidance to Local Plans and unlock larger-scale development by addressing cross-boundary housing need, transport infrastructure, and land supply bottlenecks.<sup>29</sup> SDSs are designed to bring coherence, speed, and certainty to a fragmented and highly localised planning system. They will be the spatial framework underpinning the growth mission. Local Plans, produced by each local authority, must conform with the SDS – meaning that the SDS becomes a crucial anchor for all local decision-making and site allocations.<sup>30</sup>

By resolving key strategic issues upfront – such as how unmet housing needs are distributed across local authority boundaries, or where new transport infrastructure should go – SDSs should de-risk development and speed up Local Plan preparation and delivery, particularly where local authorities have historically failed to cooperate or delayed making difficult decisions about growth locations.<sup>31</sup> For example, research from the RTPI has shown that this layer of strategic planning leads to faster, better Local Plans that fall within the strategic area.<sup>32</sup>

23 https://public.conservatives.com/static/documents/GE2024/Conservative-Manifesto-GE2024.pdf

<sup>24</sup> https://www.libdems.org.uk/fileadmin/groups/2\_Federal\_Party/Documents/PolicyPapers/Manifesto\_2024/For\_a\_Fair\_Deal\_-\_Liberal\_ Democrat\_Manifesto\_2024.pdf

<sup>25</sup> https://www.hbf.co.uk/policy/planning-appeals-researching-local-authority-legal-costs/

<sup>26</sup> https://www.gov.uk/government/news/obr-concludes-planning-reforms-will-bring-housebuilding-to-its-highest-level-in-40-years

<sup>27</sup> https://www.sharpepritchard.co.uk/latest-news/planning-and-infrastructure-bill-spatial-development-strategies/#:~:text=The%20Bill%20 enables%20the%20Government,two%20or%20more%20principal%20authorities.

<sup>28</sup> https://www.rtpi.org.uk/policy-and-research/research-and-practice/local-plan-research-project/

<sup>29</sup> https://publications.parliament.uk/pa/bills/cbill/59-01/0196/240196.pdf

<sup>30</sup> https://www.gov.uk/government/publications/the-planning-and-infrastructure-bill/factsheet-strategic-planning

<sup>31</sup> https://www.gov.uk/government/publications/the-planning-and-infrastructure-bill/factsheet-strategic-planning

<sup>32</sup> https://www.rtpi.org.uk/media/15954/101823g5143psrtpi-local-plan-research.pdf

### "BUILD BABY BUILD": THE GOVERNMENT IS PROMISING TO TAKE ON THE NIMBYS...

In the Government's drive to "build baby build",<sup>33</sup> Sir Keir Starmer has made an explicit promise: "this government is on the side of the builders, not the blockers."<sup>34</sup>

In service to this, mandating the production of SDSs comes as part of a broad package of reforms to English Devolution and the planning system that will reduce opportunities for development to be blocked and delayed. The explicit target of the Government is NIMBYs – people seen as getting in the way of the developments by opposing housing and infrastructure being built 'in their backyard' – with the Prime Minister lamenting that "for too long, the NIMBYs and naysayers have been able to clog up our system so things can't get built."<sup>35</sup>

The argument underpinning this is that when people do have the opportunity to have their say in housebuilding, they mainly say 'no'. Reducing the possibility for public engagement will mean that plan making and housebuilding can proceed more quickly as there'll be fewer public objections blocking permissions and less time spent on costly legal battles to overturn these.

To this end, the Planning and Infrastructure Bill does not introduce any new statutory requirements for public participation during their preparation beyond the existing obligation for a late-stage consultation once the plan is drafted. There is no requirement for strategic authorities to involve the public earlier or in any meaningful way in the plan-making process.

This is weaker than current requirements for Local Plans, which mandate early-stage public consultation under Regulation 18, allowing communities to engage with issues and options before a draft plan is prepared.<sup>36</sup> Similarly, planning applications are subject to statutory public consultation requirements, including notifying neighbouring residents and providing a minimum 21-day period for public comments before a decision is made.<sup>37</sup>

### ...BUT ITS APPROACH APPEARS TO BE BACKFIRING, WITH THE NUMBER OF NIMBYS RISING

In part the logic of this argument is correct – the majority of people who currently engage in planning consultations do say 'no'. But this is a small minority of the population. Only 6% of people in England report having made an objection to a planning application in the past year, according to new nationally representative polling conducted for this research in April 2025.<sup>38</sup> This is a reflection of the fact that engagement processes are weighted towards those people who have the time and resources to take part, and a strong opinion to share.

**Only 6% of people in England report having made an objection to a planning application** in the past year, according to new nationally representative polling conducted for this research in April 2025.<sup>38</sup>

cron=1745327394.6256749629974365234375#google\_vignette 37 https://www.gov.uk/guidance/consultation-and-pre-decision-matters

<sup>33</sup> https://www.bbc.co.uk/news/articles/c805mjxe2y9o

<sup>34</sup> https://www.gov.uk/government/news/thousands-of-new-homes-to-be-built-as-government-unlocks-brownfield-sites

<sup>35</sup> https://metro.co.uk/2025/02/13/keir-starmer-take-nimbys-get-britain-building-22546316/

<sup>36</sup> https://www.townplanning.info/town-planning-in-england/development-plans/local-plan-preparation-and-process-guide/?doing\_wp\_

Nationally representative poll conducted 4th – 6th April 2025. Base: England respondents (n=1724). See appendix for more detail on methodology.

This means the loudest voices represent a very small minority. NIMBYs are generally those who are more likely to have an interest in maintaining the status quo and are less likely to value the need for housing when weighed against the impacts on their property value, the local area or public services. In our poll, homeowners in England were twice as likely (8% compared to 4%) to say they had made an objection than renters.

Not all NIMBYs take actions based on their views, such as responding to consultations, but the number of people opposed to housebuilding has been growing since the Labour Government started putting its plans into action. In September 2024, Labour Together found that 17.5% of the public are NIMBYs, defined as supporting housebuilding in their local area under a very limited number of scenarios (none or one).<sup>39</sup> Using the same scenarios, we replicated this polling in April 2025, and found an increase in the proportion of NIMBYs to 23%.<sup>40</sup> While it is difficult to directly compare the results of these polls, this difference is far beyond the margin of error.<sup>41</sup> Other polling backs this up – YouGov's tracker shows that overall support for 'a large increase in the amount of new housing built in your own local area' has decreased while opposition has increased since the last election.<sup>42</sup> According to this tracker, opposition started to overtake support from January 2025 for the first time in three years.

Why January? Starmer's anti-NIMBY rhetoric started to ramp up from December 2024. This suggests that the Government's plans and rhetoric could be backfiring – provoking more opposition, rather than less. In his *Plan for Change* speech on 5th December, the Prime Minister promised to send a message to "the NIMBYs, the regulators, the blockers and bureaucrats... the alliance of naysayers" with a direct challenge: there will be more development "whether you like it or not".<sup>43</sup>

<sup>39</sup> https://www.labourtogether.uk/insights/britain-a-nation-of-mimbys See appendix for more detail on the scenarios and how each group was classified against them.

<sup>40</sup> Nationally representative poll conducted 4th – 6th April 2025. Base: GB respondents (n=2018)

<sup>41</sup> While we replicated Labour Together's questions, we worked with a different polling company, limiting the direct comparability of the results. However, other polling evidence supports the rise in NIMBYism. See appendix for more detail on how NIMBYs, MIMBYs, and YIMBYs were classified.

<sup>42</sup> https://yougov.co.uk/topics/politics/trackers/support-for-increased-house-building-in-your-local-area?period=5yrs

<sup>43</sup> https://www.gov.uk/government/speeches/pm-speech-on-plan-for-change-5-december-2024

From this moment onwards, Starmer used the language of 'NIMBYs' and 'blockers' on at least eight more occasions:

Ŷ	September 2024: Labour Together polling finds that 17.5% of Britons are NIMBYs
ļ	October 14th 2024 - Starmer: "enabl[ing] the builders not the blockers"44
þ	<b>December 5th 2024 - Starmer:</b> "the NIMBYs, the regulators, the blockers and bureaucrats the alliance of naysayers" <sup>45</sup>
	<b>December 6th 2024 - Starmer:</b> "For too long, Britain has been held to ransom by blockers and bureaucrats who've stopped the country building, suffocating working people's aspirations. Those days are over." <sup>46</sup>
þ	December 12th 2024 - Starmer: "Builders not blockers."47
	January 13th 2025: Opposition to housebuilding in local areas overtakes support for the first time in 3 years in YouGov's tracker.
	January 23rd 2025 - Starmer: "My Labour Government will stop the time-wasting Nimbys and zealots from holding the country to ransom" <sup>48</sup>
ၦ	February 5th 2025 - Starmer: "push past the nimbyism" <sup>49</sup>
þ	<b>February 6th 2025 - Starmer:</b> "For too long, the blockers and Nimbys have strangled our chances of cheaper energy, growth and jobs" <sup>50</sup>
þ	<b>February 6th 2025 - No 10 press release:</b> "ripping up archaic rules and saying no to the NIMBYs" <sup>51</sup>
ၦ	February 13th 2025 - Starmer: "I'm ready to take on the Nimbys" <sup>52</sup>
þ	March 19th 2025 - Starmer: "We are backing the builders – not the blockers."53
6	April 2025: Our polling finds that 23% of Britons are NIMBYs

- $\label{eq:linear} 44 \quad https://www.gov.uk/government/speeches/pm-international-investment-summit-speech-14-october-2024$
- 45 https://www.gov.uk/government/speeches/pm-speech-on-plan-for-change-5-december-2024
- 46 https://x.com/Keir\_Starmer/status/1864959245294166259

50 https://x.com/Keir\_Starmer/status/1887412293505343678?lang=en

<sup>47</sup> https://www.facebook.com/10downingstreet/posts/builders-not-blockers-we-are-overhauling-the-planning-system-to-deliver-15-milli/905396081779724

<sup>48</sup> https://www.dailymail.co.uk/debate/article-14314783/KEIR-STARMER-Labour-Government-stop-time-wasting-Nimbys-zealots-holding-country-ransom.html

<sup>49</sup> https://www.thetimes.com/uk/politics/article/keir-starmer-vows-to-power-past-nimbys-and-build-nuclear-stations-rjw9vf3ts

<sup>51</sup> https://www.gov.uk/government/news/government-rips-up-rules-to-fire-up-nuclear-power

<sup>52</sup> https://metro.co.uk/2025/02/13/keir-starmer-take-nimbys-get-britain-building-22546316/

<sup>53</sup> https://x.com/Keir\_Starmer/status/1902442830041055690

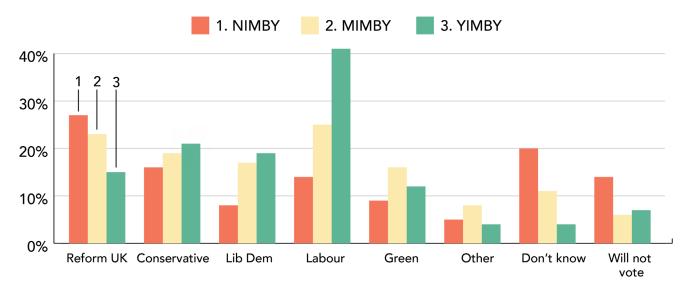
If the anti-NIMBY rhetoric continues in this direction, the Government may face significant backlash on the ground to its housebuilding plans. Moreover, the publications of the draft National Planning Policy Framework (NPPF), English Devolution White Paper and Planning and Infrastructure Bill set the legislative ball rolling towards actioning this rhetoric. For example, in April 2025, the Government proposed an amendment to the Planning and Infrastructure Bill to scrap "burdensome statutory consultation requirements" for major infrastructure projects.<sup>54</sup>

Rising numbers of NIMBYs could have real implications at the ballot box.<sup>55</sup> Our polling shows that NIMBYs are more likely than average to be considering voting for Reform UK (27% vs 23%), not know who to vote for (20% vs 12%), or planning not to vote at all (14% vs 8%).<sup>56</sup> MIMBYs, meanwhile, are almost evenly split between the different parties: with 25% considering voting Labour, 23% for Reform, 19% for Conservatives, 17% for Liberal Democrats, and 16% for Greens. In contrast, YIMBYs have by far the most concentrated voting intention, with 4 in 10 considering voting Labour (41% vs 24% average).

### FIGURE 2

### Reform UK are the largest party with NIMBY voters, followed by undecided voters

Proportion of YIMBYs, MIMBYs, and NIMBYs who would consider voting for each party if there were a General Election tomorrow



### THE UNHEARD MAJORITY: THE MIMBYS

In response to concerns about NIMBYs, a YIMBY (Yes in My Backyard) movement has grown to show support for building new developments, even if it's in 'my backyard'. In the UK, the YIMBY movement emerged in the late 2010s, with various organisations advocating for more housing especially in areas of high demand.

But YIMBYs are similarly as unrepresentative of the population as NIMBYs, making up only 10% of the population in our poll,<sup>57</sup> and with only 3% of people in England reporting having made a supportive statement to a planning application in the past year.<sup>58</sup> Again, the process is weighted towards people with the time and resources to take part, with YIMBYs more than twice as likely to be from the highest socioeconomic groups than the lowest.<sup>59</sup>

<sup>54</sup> https://www.gov.uk/government/news/planning-reforms-to-slash-a-year-off-infrastructure-delivery#:~:text=Burdensome%20statutory%20 consultation%20requirements%20unique,railways%2C%20and%20windfarms%20that%20will

<sup>55</sup> https://commonslibrary.parliament.uk/general-election-2024-turnout/

Nationally representative poll conducted 4th – 6th April 2025. Base: GB respondents (n=2018)
 Nationally representative poll conducted 4th – 6th April 2025. Base: GB respondents (n=2018). See appendix for a more detailed

explanation of methodology and the YIMBY, MIMBY, and NIMBY classification

<sup>58</sup> Nationally representative poll conducted 4th - 6th April 2025. Base: England respondents (n=1724)

<sup>59</sup> Our poll found that YIMBYs represent 12% of ABs, 12 of C1s, 11% of C2s and 5% of DEs.



Most people don't even know how to get their voices heard, with over half (52%) of the public in England saying they don't know how to take part in consultations about developments in their local area.

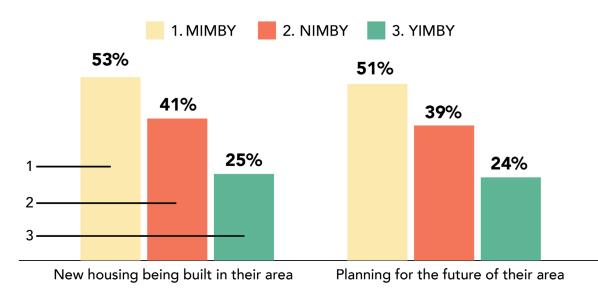
While only 9% have commented on a planning application in the past year, even fewer – 6% – report responding to a consultation on their Local Plan in the past year.

There is an unheard majority out there. Most people don't even know how to get their voices heard, with over half (52%) of the public in England saying they don't know how to take part in consultations about developments in their local area. While only 9% have commented on a planning application in the past year, even fewer – 6% – report responding to a consultation on their Local Plan in the past year. Our polling shows that MIMBYs make up 67% of the population.<sup>60</sup> Compared to YIMBYs and NIMBYs, MIMBYs are least likely to feel they currently have a say in decisions on new housing being built in their area, or decisions on planning for the future of their area.

### FIGURE 3

### MIMBYs are the least likely to feel they have a say on housebuilding and planning for their area.

Proportion of MIMBYs, NIMBYs, and YIMBYs disagreeing that they have a say on: new housing being built in their area, and on planning for the future of their area over the next 15 years



60 Nationally representative poll conducted 4th – 6th April 2025. Base: GB respondents (n=2018). See appendix for a more detailed explanation of methodology and the YIMBY, MIMBY, and NIMBY classification

Therefore, rather than excluding everyone from having their say, if the Government wants to unlock housebuilding in a way that builds trust in the process and is more likely to enable their plans, not in a way that fuels opposition, it should instead ensure that public participation is done well. And by this, we mean done early in the planning process and done in a way that enables a representative cross-section of the community to take part – including the MIMBY majority.

Giving a broader range of people a real opportunity to participate in planning processes not only means that a more balanced set of views towards new developments is heard, it also improves the quality of plans being made as they reflect the needs and wants of a larger crosssection of the people who live there.

#### What's wrong with the way we do planning consultations now?

The small minority of people who engage with planning currently most often do so once an application has been submitted for a development in their area. Too often, this places people in a defensive stance, where they are given a narrow window of time to respond to an application, rather than invited to work constructively and collaboratively to help shape wider plans for their area, or to get involved at pre-application stage. Without any context for why new developments are needed, it's no surprise that responses then focus on the impact on individuals rather than on society, leading to a 'no' more often than a 'yes'. Our poll found that people in England were twice as likely to provide an objection than a supportive statement (6% vs 3%) to a planning application.<sup>61</sup>

Barely anyone is winning in this system. Whether residents respond negatively, positively or not at all to consultations on new developments, only 12% of the public feels they have a say over the outcome. This is due to a widespread perception that planning authorities not only don't listen to public views, but in fact actively avoid trying to hear from the public.

A nationally representative, UK-wide poll by Commonplace revealed in 2021 that a majority (52%) of people believe that decision-making about new developments is conducted "in secret to avoid a public backlash" and 55% agreed that "there is rarely any point opposing a development at the planning stage as it will likely go ahead anyway", indicating the perceived futility of taking part in the current consultation processes.<sup>62</sup>

Going over the heads of communities in deciding what to build and where, or maintaining the current process where only the loudest voices in the community, of whom the majority are oppositional, are heard, creates a system that invites backlash from communities and will only lead to a slower planning process. If the Government wants more homes to be built, and faster, it needs to encourage work with communities, in the right way.

Current consultation processes also tend to benefit some members of the public more than others. While awareness of consultations is generally low, with only 48% of the population saying they know how to take part in consultations about developments in their local area, it is higher among some groups. Those significantly more likely to say they know how to take part are: homeowners compared to renters (54% vs 39%), those in a higher socioeconomic grade compared to a lower socioeconomic grade (56% in socioeconomic grade AB vs 39% in grade DE), those without disabilities compared to those with disabilities (50% vs 44%), and older people compared to younger people (53% of those aged 55+ vs 42% of 18-34s).<sup>63</sup>

<sup>61</sup> Nationally representative poll conducted 4th - 6th April 2025. Base: England respondents (n=1724)

<sup>62</sup> https://www.commonplace.is/hubfs/Engaging%20for%20the%20Future.pdf?hsCtaTracking=f2f7a455-4eac-493b-865b-

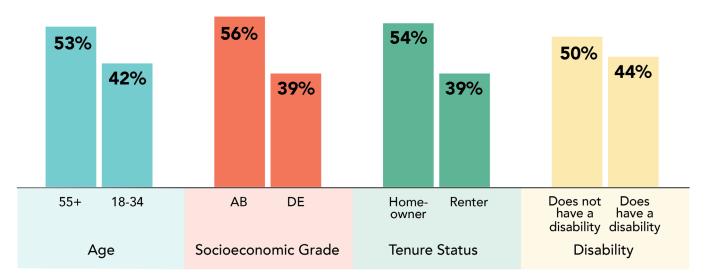
<sup>03678</sup>a40faab%7Cd2126c33-2397-4433-afaa-61110da90ed2

<sup>63</sup> Nationally representative poll conducted 4th - 6th April 2025. Base: England respondents (n=1724)

### FIGURE 4

### Knowledge of planning processes is skewed toward certain groups

Proportion of respondents saying they are aware of how to take part in planning consultations across different groups



Other research shows that this translates into who participates in planning processes. Participation in Local Plan decision-making processes tends to be dominated by older, wealthier, home-owning and predominantly white residents – who typically benefit from less development,<sup>64</sup> while younger, less affluent and minority groups – who are usually more in need and in favour of housebuilding – are underrepresented.<sup>65</sup> Our polling shows that, if they wanted to share their opinion on new housing being built, half (50%) of 18-34 year olds in England would not know how to, compared to 41% of 35-54 year olds and 37% of those aged 55 and over.<sup>66</sup> Similarly, 51% of people from ethnic minority backgrounds say that they would not know how to, compared to 40% of white respondents.

Homeowners tend to have a stronger perceived stake in the outcomes of planning decisions, as changes can directly affect property values or neighbourhood character. Additionally, older and more affluent individuals are more likely to have the time, confidence, and resources to engage with complex planning processes, which can be opaque and time-consuming. In contrast, younger people, renters, and marginalised communities often face practical barriers to participation, including a lack of easily accessible information, limited time due to work or caring responsibilities, and a feeling that their voices won't be heard or acted upon. Of the respondents to a 2021 survey who had taken part in planning consultations but were dissatisfied, 26% felt that certain groups were excluded from participating due to the way the consultation was conducted.<sup>67</sup>

This imbalance most often skews planning consultations towards objections and maintaining the status quo, making them less reflective of the diverse needs and priorities of an area, which undermines their legitimacy and produces an illusion that people are anti-development.

It is unsurprising therefore that the Government perceives consultation and public engagement to be synonymous with NIMBYism and opposition from the "usual suspects". But most people are not NIMBYs, or even YIMBYs. The majority, the MIMBYs, are not being heard. Truly representative participatory processes would empower those unheard groups to have their say,

<sup>64</sup> https://onlinelibrary.wiley.com/doi/abs/10.1111/puar.13052

<sup>65</sup> https://housingevidence.ac.uk/wp-content/uploads/2024/02/220406-Public-participation-in-planning-in-the-UK\_v3.pdf

<sup>66</sup> Nationally representative poll conducted 4th - 6th April 2025. Base: England respondents (n=1724)

<sup>67</sup> https://www.commonplace.is/hubfs/Engaging%20for%20the%20Future.pdf?hsCtaTracking=f2f7a455-4eac-493b-865b-

<sup>03678</sup>a40faab%7Cd2126c33-2397-4433-afaa-61110da90ed2

prompting a more balanced, constructive conversation about planning. As a result, early and representative public participation in the planning process would help the Government achieve its housebuilding targets by building support and legitimacy for its plans.<sup>68</sup>

### Tackling the housing crisis, tackling the trust crisis

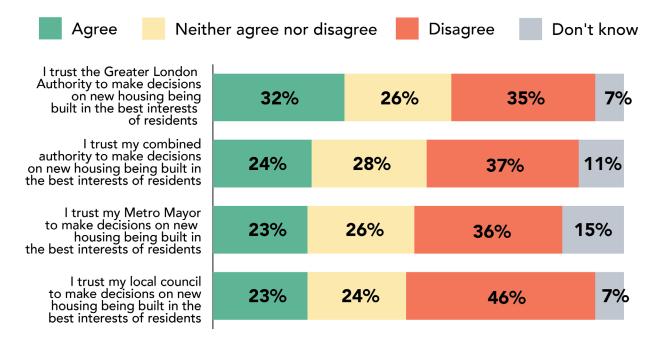
Trust in planning is already low: our polling found consistently low trust in local politicians and political institutions to make decisions on new housing being built in the best interests of residents, with only 23-24% saying they trust local councils, metro mayors, and combined authorities, where relevant, to make these decisions.<sup>69</sup> The issue of distrust came up strongly and spontaneously in our Citizens' Conversations on planning, and engaging in the development of SDSs, as explored on page 43.

"I don't have much faith in the [planning] process. I don't even have faith in the local council – how do they scale that up on a bigger scale?"

- West Midlands Combined Authority resident

### FIGURE 5

There is low trust in planning and housebuilding decision-makers. Level of agreement with a range of statements on trust.



The crisis of trust is not just a challenge for the planning system and government policy – it is a threat to the UK's democratic health. Trust in politics and public institutions is at a crisis point more broadly, with many citizens perceiving that their concerns are ignored and that little progress is being made on addressing their wants and needs. This decline in trust is not confined to isolated areas of public policy but reflects a broader crisis of confidence in political

68 https://www.labourtogether.uk/insights/britain-a-nation-of-mimbys

<sup>69</sup> Nationally representative poll conducted 4th - 6th April 2025. Base: England respondents (n=1724)

institutions and decision-making processes. Citizens feel disconnected from the political system and their disillusionment is growing as politics becomes less about consensus-building and more about confrontation and divisiveness. Last year, Demos's *Trustwatch* report revealed that 45% of the public 'almost never' trust governments – regardless of the party in power – to prioritise the national interest over party political interests; 58% 'almost never' trust politicians to tell the truth when they are in a tight corner.<sup>70</sup>

Traditional decision-making systems and structures have failed to confront and address a growing sense of disenfranchisement and a rise in polarisation and populism. This also makes it harder to build consensus around contentious issues like housing as single-issue campaigns are ripe for populist rhetoric; by framing development projects as threats to local communities, legitimate local concerns can be hijacked to fuel anti-establishment sentiment.

As the sentiment grows that politicians and institutions are disconnected from the public and their priorities, it is crucial that we build a more collaborative democracy with politicians partnering with the public to tackle the challenges the country faces. Demos's *Citizens' White Paper* demonstrated that people would like to be more involved in decision-making: 63% of the British public said they would be likely to accept an invitation to participate in a governmentled public participation exercise.<sup>71</sup> Specifically, when presented with a list of policy issues and asked which they believe should have more public participation in decision-making, 66% of the public selected infrastructure issues, such as housing. Additionally, in a 2020 survey from Commonplace and Public First, despite low trust in established decision-making institutions, when ranking whose input they value the most in determining support for local development, fellow residents received the highest levels of trust: residents' associations (75%) and neighbours (70%).<sup>72</sup> Involving citizens in policymaking results in policies that work better for people, increases trust between citizen and state, and strengthens citizenry.<sup>73</sup>

70 https://demos.co.uk/research/trustwatch-2024/

03678a40faab%7Cd2126c33-2397-4433-afaa-61110da90ed2

<sup>71</sup> https://demos.co.uk/wp-content/uploads/2024/07/Citizens-White-Paper-July-2024\_final.pdf

<sup>72</sup> https://www.commonplace.is/hubfs/Engaging%20for%20the%20Future.pdf?hsCtaTracking=f2f7a455-4eac-493b-865b-

<sup>73</sup> https://demos.co.uk/wp-content/uploads/2024/07/Citizens-White-Paper-July-2024\_final.pdf

## **SECTION 2** THE CASE FOR EARLY AND REPRESENTATIVE PUBLIC PARTICIPATION IN STRATEGIC PLANNING

The way engagement is done now is skewed towards people most likely to oppose development. It is, therefore, unsurprising that the Government in its ambition to speed up housebuilding sees consultation as a drag on the process and is keen to minimise opportunities for people to get involved.

However early and representative public participation in strategic plan making can help to streamline the planning process. By giving the MIMBY majority a chance to be heard alongside YIMBY and NIMBY voices, what is heard will give a truer and fuller picture of community perspectives on the principles of development, and therefore giving space for a countervailing narrative to objections later down the line.

This would result in a more effective planning process which meets the whole communities' needs, and helps to build trust between citizens and the authorities.

### WHAT ENGAGEMENT IS CURRENTLY REQUIRED OF STRATEGIC AUTHORITIES ACCORDING TO THE PLANNING AND INFRASTRUCTURE BILL?

The Planning and Infrastructure Bill sets out minimal requirements for engagement in Spatial Development Strategy (SDS) preparation. There is no requirement to engage people in the process of developing the vision, objectives, principles or policies as contained in the SDS.

The only point at which strategic authorities are encouraged to inform people and solicit representations is once the draft plan is written. The SDS undergoes an independent Examination in Public (EiP) by the panel appointed by the Planning Inspectorate to ensure it is legal and sound.

The only statutory requirement for public involvement is in the Pre-Examination Setup stage when the draft plan is published and the strategic authority can – but is not obliged to – notify certain groups, including voluntary organisations operating in the area, and bodies that

represent the interests of different ethnic groups or faiths, and invite representations over a short period of a few weeks.

### WHAT DO WE MEAN BY PUBLIC PARTICIPATION?

Public participation is an approach to policymaking that involves people impacted by an issue in the policymaking process by enabling them to bring informed, considered collective judgement to bear on the issue.

When defining public participation, it is important to illustrate how it differs from some of the opportunities the public currently has to input into policymaking. For example, in the planning system, the public can currently respond to consultations and comment on planning applications. However, as we have seen, often the way planning consultations are done now results in engagement from only a small minority of residents that don't represent the whole community, and can trigger defensive contributions from those that do engage.

In contrast, public participation – or participatory policymaking – is a more demanding concept. In our *Citizens' White Paper* we set out where participatory policymaking sits on the spectrum from simply informing citizens about a policy to empowering them to make the final decision on it. We define real public *participation*, not just consultation, as sitting within the 'Involve' and 'Collaborate' parts of the spectrum:

**OUT OF SCOPE IN SCOPE OUT OF SCOPE** Collaborate Inform Consult Involve Empower To obtain Public To provide To work directly To partner with To place final participation the public public with the public the public in decision making with feedback throughout goal each aspect of in the hands of the process balanced on analysis, the decision the public and alternatives, to ensure including the objective and/or that public development decisions still information concerns and of alternatives and the to assist to be made aspirations are consistently identification them in understood of the and considered preferred solutions Promise to We will We will We will work We will look to We will the public keep you with you to vou for advice implement what keep you informed informed, ensure your and innovation you decide listen and concerns and in formulating acknowledge aspirations solutions and are directly incorporate concerns and reflected in the aspirations, your and provide alternatives advice and feedback developed on how we and provide feedback canvassed a range of on how views public input influenced the decision

Increasing impact on the decision

How the spectrum	Informing and Consulting includes marketing and	<b>Involving</b> and <b>Collaborating</b> is within the scope of participatory	Empowering is outside of
relates to	communications, sending	policy making. It is a non-	the scope of
participatory policy	out information, formal consultations, public	tokenistic, genuine approach to inviting the public into policy	what we are proposing. It
making as set out in	meetings. Usually means setting out information,	making. Government decision makers consider everything they	includes placing final decision
the Citizens' White Paper	and at a particular time in the decision process,	hear from the public, and then make the final decision.	making in the hands of public.
	asking for views. This is outside of participatory policy making.		

Table adapted from the International Association of Public Participation's spectrum of public participation.<sup>74</sup>

One of the key methodologies used in participatory practices is deliberation, which seeks to reach considered, *collective* judgement on an issue, compared to other qualitative research methods which explore individual top of mind reactions. The outputs should inform decision-making on the issue.

Deliberation generally involves:

- Sharing a range of perspectives, evidence and information sources this means that participants learn about the issue and the various trade offs so are more able to contribute constructively to a discussion about it, particularly when it's a technical or complex topic
- Facilitated discussion between participants this means that participants are exposed to viewpoints and experiences they may not have previously considered, often leading to people changing their own views on a topic and even at times overcoming cognitive biases<sup>75</sup>
- Identifying areas of consensus for decision-making this means that participants must find compromise with others to ensure the policy works not just for them but for others too, leading to more consideration of others' needs and increased empathy<sup>76</sup>

### THE EXISTING EVIDENCE BASE

Strategic planning as delivered via Spatial Development Strategies (SDSs) is a new layer of planning for most strategic authorities in England (aside from the Greater London Authority (GLA) and Liverpool City Region Combined Authority (LCRCA), which have voluntarily progressed the development of SDSs, as explored in the subsequent section). This means there is little precedent yet to build a substantial evidence base about the efficacy of public participation in the SDS process.

However, there are other precedents we can draw on to build confidence in this approach. The evidence described below demonstrates how meaningful participation can help progress different planning processes.

To strengthen this emerging evidence base, we recommend (see page 57) that a new SDS that is going to be created is used as a testbed for the Government's new Test, Learn and Grow

<sup>74</sup> https://www.iap2.org/page/pillars

<sup>75</sup> https://www.involve.org.uk/sites/default/files/uploads/docuemnt/Changing-Hats15-05-14\_1\_0.pdf

<sup>76</sup> https://www.involve.org.uk/sites/default/files/uploads/docuemnt/Changing-Hats15-05-14\_1\_0.pdf

programme to definitively evidence the impact of public participation in their preparation, given that the wins achieved by this in terms of speed and greater housing numbers will enable the Government to achieve its stated mission of economic growth.

### EVIDENCE THAT GOOD PUBLIC PARTICIPATION REDUCES RISK AND SPEEDS UP PLANNING

### The Scottish Land Commission

Through 44 interviews with developers, landowners, consultants, and others in the planning and development sector, the Scottish Land Commission demonstrated that involving communities early and meaningfully speeds up the planning process, and helps to secure planning consent. This is because it helps to de-risk the development process, as problems can be identified and resolved at an early stage in the process.<sup>77</sup>

- Development industry participants were broadly split 50/50 as to whether early
  engagement speeded up the planning process but they all agreed that it can help
  avoid time-consuming delays or controversies once a planning application has been
  submitted. More evidence is needed to understand the differences in the experiences
  on this point.
- Almost every research participant, from very small organisations to the very large, suggested that early engagement helps to de-risk the development process, primarily by reducing objections.
- Around three-quarters of research participants, and all developers involved with large scale urban regeneration projects or urban extensions, highlighted how early engagement provides an opportunity to improve placemaking and design aspects of projects. Examples demonstrate how improvements can vary from the relatively minor to substantial changes with major benefits.

### The Auckland Plan

The Auckland Plan was described by New Zealand's Local Government Minister as "the fastest plan ever prepared in any city in the world" thanks to early input from the city's 21 local boards, Māori communities, businesses, and residents.<sup>78</sup> Auckland's strategic approach, underpinned by representative public input, replaced fragmented pre-2010 planning and enabled better coordination of land use and infrastructure.<sup>79</sup>

• This contributed to a dramatic increase in housing delivery: annual dwelling consents rose from 4,582 in 2012 to 21,307 in 2022 – 4.6 times as many.<sup>80</sup>

<sup>77</sup> https://www.landcommission.gov.scot/downloads/5ee1fa960b190\_20200611%20SLC%20REPORT%20Value%20of%20Early%20 Engagement%20in%20Planning.pdf

<sup>78</sup> https://www.stuff.co.nz/auckland/5653221/Auckland-strives-for-worlds-best-city

<sup>79</sup> https://gg.govt.nz/sites/default/files/2021-06/RC%20142%20Auckland%20Governance.pdf

<sup>80</sup> https://www.stats.govt.nz/information-releases/building-consents-issued-december-2022/

### South Dublin

 South Dublin County Council's upstream engagement enabled deliberative discussion of trade-offs and priorities before their draft plan was set, resulting in a "smoother, less adversarial" process.<sup>81</sup>

#### Lewes

• In the UK, the Phoenix development in Lewes shows how involving communities early can turn opposition into support. Through "catalytic conversations" at the start of the process, residents helped shape the scheme and supported it through planning.<sup>82</sup>

### EVIDENCE THAT GOOD PUBLIC PARTICIPATION IN PLANNING BUILDS TRUST WITH RESIDENTS

- The Scottish Land Commission found that communities who are engaged early are more likely to understand the rationale for development and feel their views have been taken seriously. Early public participation also leads to a more actively engaged citizenry and a stronger sense of community.<sup>83</sup> This was important, because Scottish Government research had previously identified lack of trust as one of the fundamental barriers to community engagement in planning.
- The Auckland Plan's participatory approach helped reach more diverse voices:
   48% of respondents were under 45 and participation by Māori and Asian residents significantly increased.<sup>84</sup>
- In Grosvenor's 2019 poll, 71% of respondents said they would have more trust in development if there was more opportunity for local involvement.<sup>85</sup>
- A study of public participation in the UK's Nationally Significant Infrastructure Projects (NSIP) decision-making processes found that instances of good public participation built trust and improved the ability of the public to contribute meaningfully.<sup>86</sup>

<sup>81</sup> https://www.newlocal.org.uk/wp-content/uploads/2024/10/Constructing-Consensus.pdf

<sup>82</sup> https://issuu.com/humannatureplaces/docs/das\_issuu\_2\_?fr=sM2FmYjU3NTk3MzE

<sup>83</sup> https://www.landcommission.gov.scot/downloads/5ee1fa960b190\_20200611%20SLC%20REPORT%20Value%20of%20Early%20 Engagement%20in%20Planning.pdf

<sup>84</sup> https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/auckland-plan/about-the-auckland-plan/ Evidence%20reports%20documents/evidence-report-developing-the-plan.pdf

<sup>85</sup> https://www.landcommission.gov.scot/downloads/5ee1fa960b190\_20200611%20SLC%20REPORT%20Value%20of%20Early%20 Engagement%20in%20Planning.pdf

<sup>86</sup> https://www.liverpooluniversitypress.co.uk/doi/full/10.3828/tpr.2019.10

### GOOD PUBLIC PARTICIPATION MEANS EARLY AND REPRESENTATIVE ENGAGEMENT

### Public participation should be early

The Planning and Infrastructure Bill only requires strategic authorities to invite representations once the draft SDS is published. It is therefore possible that a strategic authority could do no public engagement until the plan is fully drafted.<sup>87</sup> However, this means that there is no opportunity for people to feed into the vision for the future of their area.

Involving people earlier in the plan making process means that people can actively shape the vision and principles for development that underpin the technical detail of the plan. By the time the plan is written, the opportunities for changes are limited, not least because the document is so technically complicated that only the most dedicated residents are likely to be involved – and we know that the most engaged residents are those most likely to object to development.

Conversely, it is also true that if people feel that they or people like them have had a meaningful opportunity to contribute, they will be more likely to support the plans as they feel residents have been heard in the process. In polling conducted for this research, we showed one half of the sample a brief explanation of strategic plan-making with the participation of people in an early and representative way, and the other half an explanation that only included a traditional consultation process.<sup>88</sup> Respondents that saw our proposals – the former – were significantly more likely to agree that the plan would represent the views and needs of current residents (40%), given how it's been put together, than those who only saw the version involving the minimum requirements for public consultation (30%).

Our polling also suggests that residents feeling like they or people like them have been involved in strategic plans may even make them more likely to actively support planning applications in their local area. The sample that saw the early and representative public participation version of strategic plan-making was slightly more likely than the sample that saw the traditional consultation version (23% vs 19%) to say that as a result, they would be more likely than they are now to make a supportive statement on a planning application.

Therefore, being only offered the chance to make tightly defined representations on the final draft of the plan will further reinforce people's feeling that the Government's ambitious housebuilding plans are happening to them not *with* them, and further erode trust in the planning system and political institutions more broadly.

### Public participation should be representative

The way the planning system is set up at the moment means that those mostly likely to say 'no' are those heard the loudest. Therefore it is vital to hear from a wider range of perspectives to gather a truer picture of what the broader community wants and needs for the future. This is the case for the MIMBY majority.

Not introducing any greater opportunities for people to have their say leaves strategic authorities open to the criticism at Examination in Public stage that they have failed to adequately demonstrate that they have considered and responded to critique of the plans.

Representative public participation means engaging a cross-section of the community, ensuring that they're hearing from a demographically representative spread of residents, in terms of factors such as age, gender, ethnicity, locality and home-ownership status. This will therefore include those whose voices are usually least heard in the process, which will ensure that a more

<sup>87</sup> https://www.gov.uk/government/publications/examining-spatial-development-strategies/procedural-practice-in-the-examination-of-spatial-development-strategies#annex-a-example-timetable-for-an-examination-with-4-weeks-of-hearing-sessions

<sup>88</sup> Nationally representative poll conducted 4th – 6th April 2025. Base: England respondents (n=1724). The split sample testing methodology is explained in greater detail in the appendix

balanced range of views are represented in the SDS. For example, hearing from younger people and renters who are most affected by the housing crisis.

Further, it is disproportionate for a plan that will affect millions of people's lives over the lifetime of the plan to be subject to only the most minimal of consultations. As seen above, the plan will have much greater legitimacy and support if people across the community have been meaningfully engaged throughout the process.

Combining early and representative planning will help reduce risks and speed up the planning process.

### WHY EARLY AND REPRESENTATIVE PUBLIC PARTICIPATION IS IN THE INTEREST OF STRATEGIC AUTHORITIES

Going beyond the minimum is a difficult decision for resource-poor strategic authorities – why do more than what the Planning and Infrastructure Bill requires? What we set out will need additional staff time and budget. But the rationale for this upstream participation is clear – it will produce better policies that meet the needs of current and future residents, make it more likely that the SDS will pass the Examination in Public stage, mitigate objections later along the planning process, reduce the risk of legal challenge, and help to build trust between the strategic authority and citizens. These points are laid out in more detail below.

### **1.** To streamline and speed up the planning process and mitigate later objections to Local Plans and planning applications

Doing good public participation at strategic plan making level doesn't negate the need for this to also be done well at Local Plan making stage. And the small minority who want to object to developments in their neighbourhood may still want to do that. However, planners can rebut objections to Local Plans or to particular planning applications on the basis that the principle of development was agreed by a wide cross-section of the community upstream during the SDS preparation and supported by evidence collected through this process. It allows planning authorities to be confident in telling objectors that there was widespread participation in, and support for, the SDSs by people like them.

Good public participation will help to make the planning process progress more smoothly from strategic to local planning to development management as a result of anticipating issues earlier so that they can be resolved upstream in the planning process.

### 2. To pass the Examination in Public stage

The critical stage in the strategic plan making process is Examination in Public by a panel appointed by the Planning Inspectorate. The panel judges the plan to be sound or not. This takes place at the end of the process and failure at this stage means that much of the work over the previous years will have been wasted as the strategic authority might have to go back to the drawing board. This is not something the Government wants if it is to get universal coverage of SDSs across England within the next decade in service of its building of 1.5 million homes.

There are lessons to be learnt here from the West of England Joint Spatial Plan: after four years of work, the Planning Inspectorate made 'serious and detailed criticism of the plan' in 2019 resulting in the constituent local authorities pulling out of the joint work.<sup>89</sup> Indeed, Liverpool City Region Combined Authority (LCRCA) gave passing the examination stage as a key reason for engaging beyond statutory requirements:

<sup>89</sup> https://www.planningresource.co.uk/article/1672527/tribulations-west-england-plan-mean-future-joint-strategies

"...given that the SDS needs to be subject to public examination involving third party scrutiny by the Planning Inspectorate who will ultimately determine whether the SDS is 'sound' and appropriate for adoption, it will be important to both be aware of the criticisms that others may make of the SDS well in advance of that process, but also be able to respond, if necessary, to those challenges to demonstrate the inclusivity of multiple viewpoints to the Planning Inspector."<sup>90</sup>

Therefore the SDS being found sound at examination is vital. In order to be prepared for the panel's scrutiny of the plan, the strategic authority must be aware of any criticisms that could be levelled at it in advance and have responded to those. Plan makers need to be able to demonstrate to the panel that they have considered different options and on that basis, put forward the best possible plan. The authority therefore needs to show that it has heard from multiple viewpoints, which it can do most convincingly by demonstrating the breadth of public participation.

### **3.** To reduce the risk of legal challenge

The spectre of Judicial Review (JR) hangs over all public body decisions – and it is something that this government is particularly keen to ward off so JRs do not slow down the planning process. For those in the community who usually object to planning applications, any evidence that due process has not been followed creates an opportunity to legally challenge the decision. At best, this delays the process, and at worst halts it altogether.

Though the requirements are minimal in the Planning and Infrastructure Bill, it is still necessary to pass the legal threshold for having consulted. Giving everyone real opportunities to feed into the plan, and have their concerns heard and responded to, minimises the risk of legal challenge on the basis of lack of engagement.

Moreover, a representative sample of the community will provide valuable local knowledge that helps planners to identify areas for consideration and/or data collection. The public can often raise issues that planners otherwise would not have given enough weight to; by understanding these earlier, Judicial Reviews will be less likely as there will be fewer surprises later on and less challenging as planners will be better prepared to respond to them.

### 4. To be able to withstand political change in the strategic authority

SDSs are supposed to last for approximately 15 years. During this time, administrations leading the strategic authority could change, both in terms of leadership and political persuasion. This makes the SDSs vulnerable to being overturned by incoming administrations. By rooting the SDSs in what the public wants and needs, rather than it being associated with a particular political project, it is much harder for a new leadership to undo as it represents the will of the people.

### 5. To design better policies that meet the needs and wants of the whole community

Planners can and do create places that are wonderful to live in, but how much better to do this in partnership with the community who will be affected by these decisions for years to come? By understanding people's needs and wants, by ensuring that their priorities are understood and met, and that they have been instrumental in thinking through the trade offs that are inherent in any change, places will be created that work best for people. The London Plan explicitly states that "early engagement with local people leads to better planning proposals".<sup>91</sup>

Critical in this is involving a broad cross-section of the community so different people's needs are considered. Important within this is understanding the views of people who will be living in

<sup>90</sup> https://liverpoolcityregion-ca.moderngov.co.uk/documents/s71103/Towards%20a%20Spatial%20Development%20Strategy%20for%20 the%20Liverpool%20City%20Region%20-%20engagement.pdf

<sup>91</sup> https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-online/chapter-1-good-growth

the area in the future in the homes yet to be built – homes are being built for them just as much as to make a great place to live for people who live there now. We will discuss in our model how to enable people to think beyond their own needs to those of future residents as well.

It's not just that the plans *will* better meet the views and needs of residents, it's also that they will be perceived to do so by other residents, even those who haven't taken part in the process. As seen above, our polling suggests that simply knowing that people have been involved in an early and representative way in the development of the SDS increases the perception that the plan will meet the views and needs of residents.

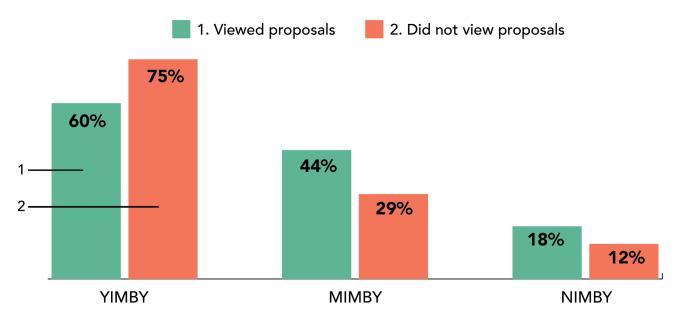
This is particularly true for MIMBYs – the unheard majority that we believe need to be activated and empowered. This group was by far the most persuaded by our proposals, with 44% of MIMBYs who had seen the version of plan-making with early and representative public participation agreeing that the plan represents the views and needs of current residents compared to only 29% who had seen the version without.<sup>92</sup>

In contrast, NIMBYs don't feel the plan represents residents' views and needs either way, while YIMBYs are actually more likely to be sceptical of the plan when seeing our proposals. It will be crucial, therefore, that strategic authorities ensure that these minority voices, some of whom may be used to having their voices heard, don't feel completely alienated from the process when amplifying the voices of the majority.

### FIGURE 6

#### Early and representative engagement helps win over MIMBYs in particular

Proportion of YIMBYs, MIMBYs, and NIMBYs agreeing that the plan represents the views and needs of current residents after viewing a version of the plan made with early and representative public participation versus viewing a version without this participation.



### 6. To build trust between residents and the strategic authority

Repairing the loss of trust in politicians and political decisions is the responsibility of all elected representatives. One way to do this is to show the electorate that the authority is listening and responding to their needs and wants, working in partnership with them to build the places where people want to live. People want to have agency over the decisions that affect their lives – and whether there is enough affordable housing close to jobs which are accessible by good

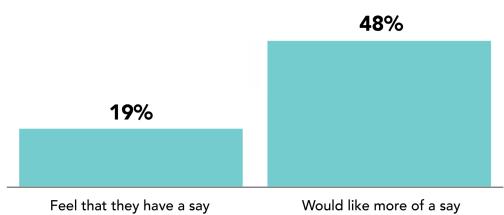
<sup>92</sup> Nationally representative poll conducted 4th - 6th April 2025. Base: England respondents (n=1724)

transport links is fundamental to people's lives. In our polling for this research, we found that 48% of people actively want to have more of a say in decisions on planning for the future of their area over the next 10-15 years, while only 13% actively don't want to have a say on this.<sup>93</sup>

### FIGURE 7

Many more people would like more of a say in planning for the future of their area than feel they currently have a say

Proportion of the public agreeing with statements on having a say on planning for the future of their area.

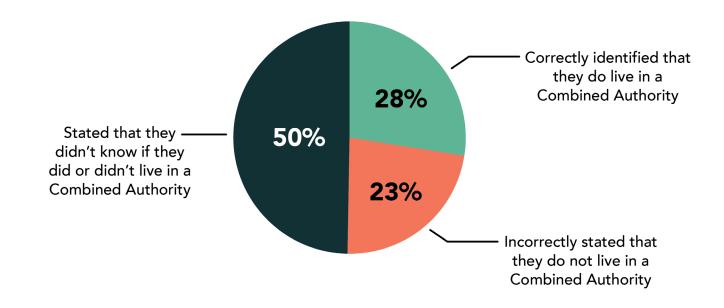


Perhaps more concerningly, our polling found that only 28% of people who live in a combined authority area (excluding the latest devolution deals in February given their recency) are aware of it. Half (50%) admit not knowing, while a further 23% wrongly believe they do not live under a combined authority.<sup>94</sup>

### FIGURE 8

### Awareness of combined authorities is extremely low

Proportion of combined authority residents saying 'Yes', 'No', or 'Don't know' when asked whether they live under a combined authority.



93 Nationally representative poll conducted 4th – 6th April 2025. Base: England respondents (n=1724)

94 Nationally representative poll conducted 4th - 6th April 2025. Base: England respondents (n=1724)

Unsurprisingly, the numbers are even more stark when the newest combined authorities are included, with only 23% aware that their area is covered by a combined authority, 27% wrongly believing their area isn't covered by a combined authority, and 51% admitting that they don't know.

This points to the uphill battle awaiting new strategic authorities when it comes to democratic engagement. Therefore, involving people in the decisions about their area's development over time is a key way to build trust with them, as well as building awareness.

The creation of new strategic authorities creates a valuable opportunity to get off on the right foot with constituents. As we have seen on pages 15-6 in relation to the government, there may be political consequences for strategic authorities if they ignore this opportunity to listen not only to the vocal minority, but the unheard majority. Involving people meaningfully in the SDS preparation process is a way of starting to build those solid, trusting relationships with people from the outset.

## **SECTION 3** THE CURRENT STRATEGIC PLANNING LANDSCAPE IN ENGLAND

Strategic planning bridges the gap between national policies such as the National Planning Policy Framework (NPPF), and Local Plans by formulating a coherent spatial vision for a subregion, synthesising the constituent councils' priorities, and addressing cross-cutting issues like transportation corridors, infrastructure, and housing distribution that no single local authority can tackle alone. This ensures development is planned in the right places with the necessary infrastructure, reflecting both local needs and broader objectives.

The Royal Town Planning Institute (RTPI) defines strategic planning as:

"... the co-ordination of activity across wide geographical areas (e.g., city-regions) and multiple sectors, including housing, transport, health, and the environment ... Effective strategic planning provides a long-term framework that derisks decision-making, providing more stable conditions for building investor confidence and delivering long term government objectives."<sup>95</sup>

While strategic planning has historically been a part of the English planning system since the 1960s through statutory plans such as Structure Plans (prepared by counties) and later Regional Spatial Strategies (RSSs),<sup>96</sup> the Localism Act 2011 removed any statutory requirements for strategic planning outside of London, making England an outlier in Europe.<sup>97</sup> While some combined authorities have the ability to engage in strategic planning, the practical application of this has been disjointed due to a lack of central government policy guidance. Some combined authorities responded by voluntarily progressing a variety of types and scales of strategic plans including Spatial Development Strategies (SDSs)<sup>98</sup> – currently in progress in Liverpool City Region Combined Authority<sup>99</sup> – and joint Local Plans – such as in Greater Manchester's *Places for Everyone*.<sup>100</sup>

<sup>95</sup> https://www.rtpi.org.uk/research-rtpi/2024/august/strategic-planning-in-england/

<sup>96</sup> https://www.legislation.gov.uk/ukpga/2004/5/contents

<sup>97</sup> https://www.rtpi.org.uk/research-rtpi/2024/august/strategic-planning-in-england/

<sup>98</sup> https://www.countycouncilsnetwork.org.uk/wp-content/uploads/dlm\_uploads/The-Future-of-Strategic-Planning-in-England.

pdf#:~:text=The%20three%20main%20strategic%20planning,and%20all%20three%20models%20are https://api.liverpoolcityregion-ca.gov.uk/wp-content/uploads/2023/12/735-LCRCA-Spatial-Development-Strategy-V11-ACCESSIBLE.pdf

<sup>99</sup> https://api.liverpoolcityregion-ca.gov.uk/wp-content/uploads/2023/12/735-LCRCA-Spatial-Development-Strategy-V11-ACCESSIBLE.pdf

Recent government analysis states that this model of planning in England has been "too local" – leading to a failure to identify major sustainable development locations or coordinate infrastructure delivery over at least the last 15 years.<sup>101</sup> Hence, the Government is now reintroducing strategic planning as part of a package of reforms aimed at delivering more homes.

In 2024, the Government released a revised draft of the NPPF – explicitly recognising that "effective strategic planning across local planning authority boundaries will play a vital and increasing role in how sustainable growth is delivered and key spatial issues, including meeting housing needs, delivering strategic infrastructure, and building economic and climate resilience, are addressed."<sup>102</sup>

The English Devolution White Paper and the Planning and Infrastructure Bill subsequently mandate strategic planning across England.<sup>103</sup> There are currently 15 combined authorities that will automatically become strategic authorities and – with the addition of the GLA – will be obliged to produce an SDS for their area. Six new strategic authorities have been announced to formally come into existence in 2026,<sup>104</sup> with further devolution deals in the pipeline as the Government has laid out its intentions for there to be strategic authorities in every part of England by the end of the Parliament such that a strategic planning layer covers the country, with the local planning layer existing underneath.<sup>105</sup>

Crucially, the SDSs will carry legal weight: once in force, Local Plans must be in "general conformity" with their respective sub-regional SDS, as well as national planning policy: the strategic policies agreed at the higher level (for example, housing numbers and key growth locations) must be incorporated into their detailed Local Plans and planning applications will be judged against the SDS policies.<sup>106</sup>

As outlined by the Government, SDSs will be intentionally high-level and focused on big picture decisions: setting out a spatial strategy, identifying strategic development locations and the scale of growth required, outlining infrastructure priorities, and highlighting areas where nature recovery or protection is needed.<sup>107</sup> Importantly, SDSs will also be used to distribute housing need across the area to the most appropriate locations.<sup>108</sup> The Planning and Infrastructure Bill specifies that an SDS will not typically allocate specific development sites (that remains the role of Local Plans), but it can identify broad areas for growth.<sup>109</sup> For example, an SDS might mark a general area of a city region as a future growth zone for a new settlement, without delineating exact site boundaries – leaving that to local planning.

By remaining high level, the SDS avoids getting bogged down in local controversies and can be agreed more quickly at strategic level. The Ministry for Housing, Communities and Local Government (MHCLG) recommends that new SDSs should be between 50-100 pages long – shorter, simpler, and less prescriptive than the London Plan (over 500 pages in length) and making greater use of diagrammatic and digital presentation – remaining streamlined and truly strategic.<sup>110</sup>

103 https://publications.parliament.uk/pa/bills/cbill/59-01/0196/240196.pdf

 $<sup>101 \</sup>quad https://www.gov.uk/government/publications/the-planning-and-infrastructure-bill/factsheet-strategic-planning#:~:text=building%20 \\ the \%20 homes\%20 their\%20 communities, need$ 

<sup>102</sup> https://assets.publishing.service.gov.uk/media/66acffddce1fd0da7b593274/NPPF\_with\_footnotes.pdf

<sup>104</sup> https://www.gov.uk/government/news/devolution-revolution-six-areas-to-elect-mayors-for-first-time

<sup>105</sup> https://www.gov.uk/government/publications/english-devolution-white-paper-power-and-partnership-foundations-for-growth/english-devolution-white-paper

<sup>106</sup> https://publications.parliament.uk/pa/bills/cbill/59-01/0196/240196.pdf

<sup>107</sup> https://www.gov.uk/government/publications/the-planning-and-infrastructure-bill/factsheet-strategic-planning#:~:text=SDSs%20are%20 produced%20across%20England%2C,In%20particular%20SDSs%20will

<sup>108</sup> https://www.gov.uk/government/publications/the-planning-and-infrastructure-bill/factsheet-strategic-planning#:~:text=SDSs%20are%20 produced%20across%20England%2C,In%20particular%20SDSs%20will

<sup>109</sup> https://www.slcc.co.uk/planning-and-infrastructure-bill-introduced-to-parliament/#:~:text=and%20non,target%20figure%20for%20the%20 area

<sup>110</sup> https://cratus.co.uk/strategic-planning-the-ugly-sister/#:~:text=The%20Government%20gives%20the%20example,the%20London%20 Plan%20now%20covers

# **CASE STUDY 1** THE LONDON PLAN (2021), GREATER LONDON AUTHORITY (GLA)

The Greater London Authority (GLA) is the strategic authority for Greater London, covering 32 local authorities. The London Plan is a statutory Spatial Development Strategy (SDS) under the GLA Act 1999.

The only statutory requirement for public participation is for public consultation on a draft plan that immediately precedes the Plan's submission to the Secretary of State, at which point much of the plan has already been set in stone and there is little opportunity for community input to be responded to and incorporated into the Plan.<sup>111</sup>

### Public participation in the 2021 London Plan

Historically, previous London Plans had limited public input, mainly consulting statutory bodies at a single stage late in the process as required by the statutory process.<sup>112</sup> However, for the 2021 London Plan, the GLA deliberately went well beyond this minimum: Mayor Sadiq Khan set out to "engage more people than ever before" – not just professionals and officials, but community groups, civic societies, and ordinary Londoners from the very start of the process.<sup>113</sup>

### Setting the vision

The first engagement phase began in October 2016 with the publication of 'A City for All Londoners' – a vision document used to initiate voluntary pre-draft engagement.<sup>114</sup> The GLA then ran a public consultation using workshops, focus groups, and online platforms. The Mayor emphasised this was a new approach designed to capture early community input.<sup>115</sup> Throughout 2017, online consultations were held on the TALK London platform on topics such as the affordability of housing in London, local parks and green space, the night time economy, flood defence, where new homes should be built, whether homes up to a certain price should be available to Londoners first, rough sleeping trends, health inequalities, and more.<sup>116</sup> There was considerable take up of these opportunities for input from the public as workshops, where participation was unpaid and voluntary, were oversubscribed.<sup>117</sup>

Specifically aiming to reach those groups who are often excluded from planning decisions, the GLA also commissioned focus groups with underrepresented groups: Londoners from ethnic minority backgrounds, disabled Londoners, refugee and migrant Londoners, LGBTQ+ Londoners, younger Londoners (17-25) and older Londoners (70+).<sup>118</sup>

Feedback from this early engagement directly shaped the draft London Plan.

114 https://www.london.gov.uk/sites/default/files/city\_for\_all\_londoners\_nov\_2016.pdf

<sup>111</sup> https://www.london.gov.uk/city-hall-blog/what-regulation-19-event

<sup>112</sup> https://www.london.gov.uk/who-we-are/what-london-assembly-does/questions-mayor/find-an-answer/developing-new-londonplan#:~:text=The%20usual%20statutory%20consultation%20process,Plan%20and%20the%20other%20Strategies

<sup>113</sup> https://www.london.gov.uk/who-we-are/what-london-assembly-does/questions-mayor/find-an-answer/developing-new-london-plan#:~:text=Sadiq%20Khan%20,remain%20an%20open%2C%20world%E2%80%91class%20city

<sup>115</sup> https://www.london.gov.uk/talk-london/

<sup>116</sup> https://www.london.gov.uk/talk-london/search?s=&created=2017-01-01&created\_1=2017-12-31&page=3

 $<sup>117 \</sup>quad https://www.london.gov.uk/programmes-strategies/planning/london-plan/new-london-plan/what-new-london-plan/$ 

<sup>118</sup> https://www.london.gov.uk/sites/default/files/acfal-consultation.pdf

#### Statutory public consultation

The Draft London Plan was published in December 2017 for statutory consultation.<sup>119</sup> This stage opened the plan up for more public input where there were almost 4000 responses.<sup>120</sup> While this was a huge increase from the previous London Plan's consultation exercise, which received 400 responses in 2010, the GLA recognised that there was more work to be done on reaching a more diverse audience that reflects London's demography and the importance of including underrepresented groups.<sup>121</sup>

The "Minor Suggested Changes" from this stage of consultation were then incorporated into the next draft that was published in August 2018.<sup>122</sup>

#### Examination and finalising the SDS

Finally, the plan went to an Evidence in Public (EiP) stage – a statutory requirement where independent inspectors assess the Plan's soundness. There were 34 days of public hearings, 51 hearing sessions, and the discussion of 94 matters with the participation of over 300 different organisations or individuals.<sup>123,124</sup>

The plan was then finalised – with 1,500 changes made based on the EiP and formally adopted by the GLA in March 2021.<sup>125</sup>

# **CASE STUDY 2** TOWARDS A SPATIAL DEVELOPMENT STRATEGY (2023), LIVERPOOL CITY REGION COMBINED AUTHORITY (LCRCA)

The Liverpool City Region Combined Authority (LCRCA) encompasses six constituent local authorities: Halton, Knowsley, Liverpool City, Sefton, St Helens, and The Wirral. In 2019, LCRCA voluntarily began the process of producing an SDS for the combined authority area.

In the absence of government guidance on the scope, scale, and development process of an SDS, the legislation around the London Plan was used as a model for LCRCA.

<sup>119</sup> https://www.london.gov.uk/sites/default/files/new\_london\_plan\_december\_2017.pdf

<sup>120</sup> https://www.london.gov.uk/sites/default/files/ms01\_rt\_hon\_james\_brokenshire\_mp.pdf

 $<sup>121 \</sup>quad https://www.london.gov.uk/decisions/add2456-consultation-tool-london-plan-guidance?ac-122857=122850$ 

<sup>122</sup> https://www.london.gov.uk/programmes-strategies/planning/london-plan/new-london-plan/draft-london-plan-consultation-and-minor-suggested-changes

<sup>123</sup> https://lichfields.uk/blog/2019/may/23/draft-london-plan-examination-in-public-blog-series/#:~:text=The%20draft%20London%20

Plan%20Examination%20in%20Public,Panel%20will%20now%20write%20up%20their%20final

<sup>124</sup> https://www.london.gov.uk/sites/default/files/the\_london\_plan\_2021.pdf

<sup>125</sup> https://www.london.gov.uk/sites/default/files/the\_london\_plan\_2021.pdf

### Public participation in the SDS

As with the GLA on the London Plan 2021, the LCRCA team saw value in going far beyond the statutory minimum in their engagement process. The planning team decided to engage the public early in the process, to aim for engagement that was as representative as possible, and to maintain transparency.<sup>126</sup>

The engagement process was initiated under the banner of "LCR Listens," a strategy aimed at fostering meaningful dialogue with the public.

#### Setting the vision

The first phase, launched in 2019, sought to reach communities traditionally underrepresented in spatial planning discussions, including young people and marginalised groups. To facilitate this, the LCRCA used the digital platform Commonplace, enabling residents to share their insights and feedback easily online. The scope was intentionally broad, seeking to shape a vision for what residents believe Liverpool City Region should be over the coming decades.

This approach resulted in approximately 2500 respondents and successfully achieved a more diverse engagement than a traditional consultation process: more than 42% of respondents were young people, 18% were from ethnic minority backgrounds, and over half were from neighbourhoods in the 90th percentile for deprivation nationally.<sup>127</sup> LCRCA was subsequently honored with the National Planning Award in 2020 for excellence in plan-making engagement.<sup>128</sup>

#### Setting the objectives

The second phase – "LCR Listens: Our Places" – ran from November 2020 to February 2021, presenting objectives for public consideration based on the vision developed in the previous stage, inviting feedback on a wide array of topics related to the SDS.<sup>129</sup> LCRCA worked with local community groups, who are often more trusted than government institutions, to reach underrepresented groups. For example, they held targeted engagement sessions with Sefton Young Advisors; Older People Workshops; the Wirral Older People's Parliament; the Women's Health Information & Support Centre.<sup>130</sup>

There was a drop in the number of people taking part compared to the first phase, which LCRCA attributes to the impact of COVID-19, as well as the increased complexity of the content increasing the difficulty of detailed engagement.<sup>131</sup> The latter issue is examined in more detail on pages 45-6.

<sup>126</sup> https://api.liverpoolcityregion-ca.gov.uk/wp-content/uploads/Annual-Review-2023-2024.pdf

<sup>127</sup> https://www.liverpoolcityregion-ca.gov.uk/news/liverpool-city-region-combined-authority-wins-prestigious-national-planning-award-forinnovative-consultation

<sup>128</sup> https://www.liverpoolcityregion-ca.gov.uk/news/liverpool-city-region-combined-authority-wins-prestigious-national-planning-award-for-innovative-consultation

<sup>129</sup> https://liverpoolcityregion-ca.moderngov.co.uk/documents/s49930/201015%2001.%20SDS%20Engagement%20Draft%20Explanatory%20 Text.pdf

<sup>130</sup> https://www.liverpoolcityregion-ca.gov.uk/sdsengagement

<sup>131</sup> https://api.liverpoolcityregion-ca.gov.uk/wp-content/uploads/2023/08/210225-ERI-Commonplace-SDS-Policies-Consultation-Phase-2A.pdf

### Writing the policy detail

The most recent phase launched in November 2023 and concluded in February 2024, aiming to refine the SDS policies through a 12-week consultation period, inviting residents, businesses, and organisations to provide input on the draft policies through an online platform and various in-person community events.<sup>132</sup>

Concurrently, a "Call for Strategic Sites" was issued, encouraging stakeholders to propose locations within the city region suitable for large-scale housing, employment, and green infrastructure developments over the next 15 years.<sup>133</sup> This culminated in the 'Towards a Spatial Development Strategy' document – the closest thing to an SDS that LCRCA has produced thus far.<sup>134</sup>

#### Statutory public consultation

As the SDS progresses towards completion, the final phase – the only statutory stage consultation – will take place when the draft SDS goes out for public consultation.

<sup>132</sup> https://www.liverpoolcityregion-ca.gov.uk/news/mayor-steve-rotheram-calls-on-people-to-have-their-say-on-blueprint-for-liverpool-city-regions-development-until-2040

<sup>133</sup> https://api.liverpoolcityregion-ca.gov.uk/wp-content/uploads/2023/12/735-LCRCA-Spatial-Development-Strategy-V11-ACCESSIBLE.pdf

<sup>134</sup> https://api.liverpoolcityregion-ca.gov.uk/wp-content/uploads/2023/12/735-LCRCA-Spatial-Development-Strategy-V11-ACCESSIBLE.pdf

# **SECTION 4** BARRIERS AND ENABLERS TO BETTER PUBLIC PARTICIPATION IN STRATEGIC PLANNING

As part of this research, we spoke to a range of experts, policymakers, and strategic authorities<sup>135</sup> to understand what difficulties strategic authorities might encounter, or have previously encountered, when looking to involve residents in developing Spatial Development Strategies (SDSs), and what enablers could help overcome those barriers. We also spoke to residents from the West Midlands Combined Authority and Liverpool City Region Combined Authority<sup>136</sup> to understand what would make it easier or more difficult for them to meaningfully participate in the development of an SDS.

The barriers and enablers that we set out below have informed our proposals and recommendations – outlined in the following two sections – to ensure that they are better set up for success by being aware of and aiming to overcome barriers, and putting in place enabling conditions as far as possible.

The barriers and enablers for residents and strategic authorities are summarised in the table, on the following page.

<sup>135</sup> See appendix for more detail on who we spoke to as part of this research

<sup>136</sup> See appendix for more detail on our resident sample.

GROUP	BARRIER	ENABLERS
Residents	Lack of trust that participation will make a difference	<ul> <li>Strategic authorities should:</li> <li>Reach out to residents proactively</li> <li>Set clear parameters and scope for participation</li> <li>Create clear feedback loops</li> <li>Work with trusted messengers</li> <li>Consider a different way of engaging the vocal minority</li> </ul>
	The technical detail is often inaccessible for non-experts	Strategic authorities should use participatory and deliberative methods to give people time, space and information to tackle complex topics There is also a need to raise public awareness on (strategic) planning more broadly
	Strategic planning feels less directly relevant to people's lives	<ul> <li>Strategic authorities should:</li> <li>Make people feel more connected to the strategic authority and area</li> <li>Make the issues feel tangible and relevant for individuals as well as for society</li> </ul>
	People lead busy lives, making it difficult to stay engaged over long periods of time	<ul> <li>Strategic authorities should:</li> <li>Remove practical barriers as far as possible</li> <li>Keep participants engaged through frequent communication</li> </ul>
Strategic authorities	Many strategic authorities are far from ready to develop SDSs, let alone engage the public in this process	<ul> <li>Strategic authorities should:</li> <li>Embed participation in SDS development</li> <li>Build relationships between planning and communications/engagement teams</li> </ul>
	Existing pressures on resources mean that more resource- intensive public participation can feel like a stretch	Strategic authorities should invest early to reduce costs later on
	Policymakers often have concerns about opening up the policymaking process	Advocates for public participation should make the case for it, to demonstrate the benefits for strategic authorities, and learn from trailblazing strategic authorities further ahead in the process

# **BARRIERS AND ENABLERS FOR RESIDENTS**

We identified four key barriers that prevent residents from taking part in the development of an SDS. Below each we have set out the enablers that could mitigate these.

# BARRIER 1: There is a lack of trust that their participation will make a difference

We know that people want to have more of a say – in a Demos poll last year, 66% of the public agreed that people like them should be involved in a participatory way in decision-making around infrastructure issues including housing and transport.<sup>137</sup>

However, the same poll identified the most common barrier to taking part in a participatory process (on any issue) as a belief that the Government wouldn't actually listen, with four in ten (41%) people saying this would make them less likely to take part.<sup>138</sup>

"You never get invited to [consultations], and if we were invited, they're not going to listen."

# Liverpool City Region Combined Authority resident

We heard the same from the combined authority residents we spoke to in the Citizens' Conversations. Not only did many feel the combined authority wouldn't listen to what they had to say, but there was also scepticism about whether the combined authority ever had any intention of listening to them. For example, we heard a common sentiment that the combined authority would have already made their mind up about the plan and that public involvement was more of a "tick-box exercise".

"I think they'll already have decided really what they're going to do."

# West Midlands Combined Authority resident

This creates a problem for residents as it decreases their motivation to take part, and also for strategic authorities in contending with this lack of trust once they get residents in the room, or once they develop their plan in proving that they really have listened to what residents have had to say. This can lead to more adversarial relationships, as we see with vocal opposition from NIMBYs.

Changing the way the public participates, and therefore who participates, may result in concerns from those who currently engage with consultations. A few representatives from strategic authorities felt that, because of the way the vocal minority are used to engaging in the current model, they may feel alienated from the process once other voices are also heard.

"[In the engagement exercise] there were a couple of key characters that made it their business to be a voice in this space... they may be used to their force of personality... and they felt they were not being listened to."

## Strategic authority representative

137 https://demos.co.uk/wp-content/uploads/2024/07/Citizens-White-Paper-July-2024\_final.pdf

<sup>138</sup> https://demos.co.uk/wp-content/uploads/2024/07/Citizens-White-Paper-July-2024\_final.pdf

# **ENABLERS**

### Reach out to residents proactively

This lack of trust means that strategic authorities can't leave it up to people to decide whether to engage with them and hope for the best. Many, particularly the least trusting, will and do choose not to engage. Instead, strategic authorities must be proactive in reaching out to residents.

If strategic authorities actively reach out to engage residents in a meaningful way, our research shows that the appetite from residents to take part does exist, even from those with low trust. Once we demonstrated to participants in our Citizens' Conversations what the conversations could look like and how they could actually inform the combined authorities' thinking, every single participant said they would be likely to take part in a conversation like the one we'd had to help develop the SDS. Some even felt they wanted to be more actively involved in their local community and issues.

"It's good to be asked – giving feedback that feels that it is going somewhere."

### West Midlands Combined Authority resident

"I wouldn't even know where to start, but it's an eye opener for me that I need to be more involved in the local area, no point complaining about it when it's done."

- West Midlands Combined Authority resident

When people do take part in participatory exercises and feel listened to, it tends to increase their sense of agency and trust in the Government institution. For example, as a result of Westminster Council's Climate Citizens' Assembly in 2023, the proportion of participants feeling they could influence the Council's decisions grew from 27% to 63%, and from 52% to 73% in terms of trust in the Council to act on the recommendations.<sup>139</sup>

### Set clear parameters and scope for participation

To set participants and the strategic authorities up for success, the strategic authority must be clear internally on the parameters and scope of public input into the SDS, and communicate that externally. The SDS will have to follow national legislation, policy and guidance, as well as consider the current political leadership's vision and policies. To do so, strategic authorities will need as much clarity as possible from national government, for example on housing numbers for their area.

The input from the public must all fall within the parameters and scope if it is to be useful to strategic authorities, and therefore more likely that the strategic authority will listen and be able to act on what they've heard, which will help build residents' trust. Therefore, the strategic authority must make the parameters and scope clear to participants from the outset, as well as throughout the process.

### Create clear feedback loops

To demonstrate that residents have been listened to, it's crucial that strategic authorities create a clear and transparent feedback loop from what participants in the SDS participation process have said, and what the strategic authority has done as a result. This will create a virtuous circle: the more trust this builds, the greater the appetite to take part in future participation exercises. It will also mean the results of the participation will be far more constructive and less adversarial in nature.

### Work with trusted messengers

Strategic authorities should also consider ways they can communicate with residents through trusted messengers such as community groups and civic leaders. In a 2021 poll, the public ranked residents' associations (75%) and neighbours (70%) as the most trusted when deciding whether or not to support a local development, compared to 58% for local councillors and 48% their local MP.<sup>140</sup> This highlights how community groups and local stakeholders are a valuable medium for strategic authorities when connecting with residents – especially for underrepresented demographics, where a community organisation can be a trusted forum. For example, during their SDS development, the LCRCA team collaborated with their Community Suppliers Network to engage and maintain feedback loops with a representative cross section of the City Region. This included faith groups, charities, and organisations supporting communities from ethnic minority backgrounds and long-term unemployed people, as well as working through existing forums such as the Youth Combined Authority and equalities panels, who helped co-design materials – testing language, adding visuals, and making them more accessible.

### Consider a different way of engaging the vocal minority

All residents should have the opportunity to contribute to the development of the SDS at some point in the process, including the vocal minority. But our proposals will mean there is space to hear the voices of the majority to enable a more balanced discussion to be had.

However, the strategic authority may wish to consider whether there are any civil society groups that they currently engage with that other residents would benefit hearing from, such as groups that represent marginalised voices.

## BARRIER 2: The technical detail is often inaccessible for non-experts

One of the key issues identified by strategic authorities who have experience of creating strategic plans was engaging residents on the more technical parts of the plan. It is easy enough to ask your average non-planner resident what their priorities are for the West Midlands over the next 15 years, but it is another thing entirely to ask a resident how to distribute housing across the area. This means that the average non-planner is likely to either not engage on a more technical question such as how housing should be

<sup>140</sup> https://www.commonplace.is/hubfs/Engaging%20for%20the%20Future.pdf?hsCtaTracking=f2f7a455-4eac-493b-865b-03678a40faab%7Cd2126c33-2397-4433-afaa-61110da90ed2

distributed, or to consider the issue without any context of considerations and trade offs, and perhaps say 'not in my backyard'.

"[The technical detail stage] is where we tend to lose people – it's just the way the system is set up."

### Strategic authority representative

In our Citizens' Conversations, we presented residents with an excerpt from the technical detail of a strategic plan about developing new housing and asked whether it felt accessible enough to engage with, and we were met with a resounding 'no'. Participants felt that the language was often too complex and full of jargon, and yet sometimes so vague as to be meaningless. Given their reaction to a small excerpt, we imagine that the hundreds of pages that SDSs have so far tended towards would feel even more daunting and inaccessible.

"Doesn't make sense – I can't get my head around it."

### West Midlands Combined Authority resident

"I know they have to go through the details and regulation but put it down in plain English for us – that's what the common person needs to know: who, what, where, when."

### West Midlands Combined Authority resident

Given only 48% of the public say they know how to take part in consultations about developments in their local area,<sup>141</sup> it's understandable that people without planning expertise would struggle when it gets to the policy detail of SDSs without any support. But the policy detail is the SDS, so if residents can't participate in this part, then they haven't really meaningfully participated in developing the plan.

## **ENABLERS**

### Use participatory and deliberative methods to tackle complex topics

It is both important and possible – with some effort – to engage residents in the policy detail of SDSs. With enough upskilling and time through participatory and deliberative methods, almost anyone can contribute meaningfully on even the most complex topics. There have been many examples of successful participatory exercises on complex topics, including planning, as can be seen on pages 67, 73 and 77.

In our model we set out ways in which this can be done for an SDS.

### Raise public awareness on strategic planning more broadly

It would also be beneficial to raise awareness and educate the public more widely on strategic planning, so that residents are starting from a higher base level of knowledge when engaging on this topic.

# **BARRIER 3:** Strategic planning feels less directly relevant to people's lives

Local Plans decide where new developments will be built in local areas and planning applications are for specific developments. The implications of these on people's lives and local environment are reasonably clear. Strategic planning, as we have seen on pages 35-6, is focused on big picture decisions at the sub-regional level.

This is not the way most people think of planning – initial associations with the word 'planning' in our Citizens' Conversations tended to be focused on specific developments in residents' local areas, often viewed negatively.

That's because the way the small number of residents that interact with the planning system do so is mostly on separate, specific planning consultations, rather than being engaged on the bigger picture. As outlined previously, this sparks responses that are focused on one's own interests when the development may directly impact your life, which is why we see the NIMBY phenomenon – even if it isn't as representative of the whole community as many think.

The scale of strategic planning compared to local planning, therefore, means it's less tangible and immediately relevant to people's lives, creating less of an obvious motivation for the public to engage. In our Citizens' Conversation, once we explained and focused on strategic planning and SDSs, several admitted that they wouldn't be particularly interested in the topic unless it felt directly relevant to their lives.

"It's so big a scale for us to contribute to... you almost feel forgotten about. It's not close enough to home for us to feel we can have a say in it."

## West Midlands Combined Authority resident

Strategic planning is likely to feel even less relevant to the average resident's life for strategic authorities without a strong spatial identity. For those that don't feel connected to their wider area, there may even be suspicion about people from other areas making decisions about their own, as we heard from a few participants.

"[A person] in Halton... won't care about my area in the Wirral."

Liverpool City Region Combined Authority resident

Many current combined authorities have a large city that dominates people's conception of that area. For the West Midlands residents, it's Birmingham; for Liverpool City Region residents, it's Liverpool. We found that the more connected people were to the large city, for example through living there or frequently travelling there, the more connected they felt to the concept of the combined authority.

"I feel proud to be from [the West Midlands] because everyone has heard of Birmingham"

### West Midlands Combined Authority resident

Most new strategic authorities being created to meet the Government's plans of strategic authority coverage across England won't have a clear focal point of a large city, such as the Shire counties.<sup>142</sup> At least initially, it's likely that many new strategic authorities will struggle to build a shared sense of identity across the area they are creating an SDS for.

This may be exacerbated by people's lack of awareness of the strategic authority itself. As we have seen on pages 33-4, only 28% of people living in a pre-2025 combined authority area are aware of it, dropping to 23% when the newest combined authorities are included.

There was very little awareness of combined authorities in our Citizens' Conversations too, which was the main reason participants felt disconnected from their combined authority. According to a short survey participants filled in before the Citizens' Conversations, only 8 out of 28 people reported feeling connected to their combined authority, with 10 feeling actively disconnected, and 10 saying either neither connected nor disconnected or don't know.

"I've only heard of the city council - this is something new."

### Liverpool City Region Combined Authority resident

All of this means that, left to their own devices, most people wouldn't choose to engage in strategic planning – if they're even aware it's happening. For example, the Liverpool City Region residents we spoke to weren't aware that an SDS was being developed. Unless a concerted effort is made by the combined authority, the people that do engage are therefore highly unlikely to be representative of the public.

# **ENABLERS**

### Make people feel more connected to the strategic authority and area

Increasing people's awareness of and connection to their strategic authority and the area it covers would increase the relevance of the SDS to people's lives, and people's ability to make constructive contributions on this topic. This will be difficult in the short-term, but in the long-term it is possible that good, consistent public participation in the work of strategic authorities (such as on SDSs) may itself lead to a greater awareness of and connection to the authority and area.

This is critical for improving democratic engagement at this level of government: without residents being aware of or feeling connected to the strategic authority and its elected politicians, residents are unlikely to engage, and, as a result, their sense of trust and legitimacy in the institution and its politicians is likely to be low.

After our two and a half hour Citizens' Conversations, there was already a shift towards participants feeling less disconnected from their combined authority, as measured in our post-survey compared to our pre-survey. Given more time and more sustained communication, it's likely that participants would start to feel even more connected to their strategic authority and the area it covers.

"We couldn't even name the Mayor [at the start] and I've learnt so much during this two hour slot."

### West Midlands Combined Authority resident

"I feel more connected to my local community as I had not known how much my opinions were reflected locally with the diverse members of the... region."

Liverpool City Region Combined Authority resident

### Make the issues feel tangible and relevant for individuals as well as for society

As with engaging people on the technical detail of SDSs, it is important and already possible to engage people on issues that feel less immediately relevant to their lives. The key is to make the issues feel more tangible and relevant. We have provided a few examples of methods onpages 74 and 77-8.

Although if the issues start to feel very close to home, as we know from planning consultations on a more local level, this may spark defensive and individualistic responses. So this is also an opportunity to have residents participate more constructively on planning by getting people to think beyond their individual interests and towards the common good. Deliberative methods of public participation are particularly helpful here, as outlined on page 26. For example, over the course of our People's Town Square on Protest last year, there was a shift away from focusing

on the impact of protest on individuals towards taking a broader, more societal perspective.<sup>143</sup>

"[In our discussion] there was a bit more of an understanding of different opinions and where there are overlaps and nuances, where you know, I had a perspective, but actually someone else's perspective actually changed mine... so that was really helpful."

Liverpool City Region Combined Authority resident

# **BARRIER 4:** People lead busy lives, making it difficult to stay engaged over long periods of time

In addition to the motivational barriers covered above, there are practical barriers stopping ordinary people from engaging. For example, people may have caring responsibilities that make it difficult to travel to take part in an in-person event, they may work long hours and can't afford to take time off, or maybe English isn't their first language.

There are practical barriers for residents taking part in one participatory exercise, let alone several over a couple of years, which is the length of time the Government is aiming for when it comes to SDS production.<sup>144</sup> It is difficult to keep people engaged over such a long period of time, especially when they're only seeing the results of their input many months or years later.

"I've not been involved in any statutory plan that's only taken one or two years to produce ... keeping [participants] engaged over that whole time is going to be a real issue."

#### Strategic authority representative

<sup>143</sup> https://demos.co.uk/research/the-peoples-town-square-on-protest-looking-beyond-the-headlines/

<sup>144</sup> This is much quicker than SDSs have so far taken to produce, with the London Plan taking 5 years and LCRCA's SDS taking 6 so far.

# **ENABLERS**

### Remove practical barriers as far as possible

You can never fully remove every practical barrier for every person, as something will always come up in someone's life that's more important than sharing their views on strategic planning at that time. But there are tried and tested methods for removing practical barriers as far as possible in participatory processes, such as offering incentives and support with caring, travel and accommodation costs.

### Keep participants engaged through frequent communication

While a concerted effort needs to be made to keep people engaged in a participatory process over a longer period of time, for example through frequent communication, once people are invested in the process, it is often not as difficult as might be thought. For example, the Hartree Ideas Exchange was a demographically representative group of 18 residents, selected through sortition, who shaped proposals for Hartree in North East Cambridge during 16 meetings over two years.<sup>145</sup>

# **BARRIERS AND ENABLERS FOR STRATEGIC AUTHORITIES**

We also identified three key areas of barriers and enablers for strategic authorities in ensuring residents take part:

# **BARRIER 1:** Many strategic authorities are far from ready to develop SDSs, let alone engage the public in this process

Through inviting combined authorities to take part in this research, or through our conversations with those we engaged, it became clear that several had not yet begun to think about SDSs or the role of the public in that process.

"We're right at the beginning of this journey."

#### Strategic authority representative

"We don't currently have an SDS and are very much at the start of this journey ... we have an idea of the mountain we've got to climb."

### Strategic authority representative

That's partly because the capacity just isn't there yet. Aside from the fact that many strategic authorities that are going to have to develop SDSs don't yet exist, several combined authorities that do exist don't yet have planning teams, given that there hasn't until now been a requirement for combined authorities to be involved in planning. Of the combined authorities that do have planning teams, for some it's just one person.

Overall, planning has become increasingly under-resourced in recent years: between 2009/10 and 2020/21, local authority net spending on planning services dropped by 43%, falling from £844 million to £480 million;<sup>146</sup> 25% of planners left the public sector between 2013 and 2020.<sup>147</sup> A 2024 Report reveals that over half (55%) of planning and placemaking professionals say that they lack the capacity within their teams for pursuing strategic objectives beyond their core statutory duties.<sup>148</sup> This means there's currently a lack of capacity to do good strategic planning, let alone good public participation in this process.

Another reason is that while combined authorities generally have communications and engagement teams, these are not always well joined up with the planning team. For example, we spoke to the one-person planning team in one combined authority about early plans for the development of the SDS, but the communications team told us they hadn't yet heard anything about it.

## **ENABLERS**

### Embed participation in SDS development

The earlier strategic authorities think about public participation in SDS development, the better that participation will be. Too often, public participation is an afterthought rather than embedded in the policymaking process.

There's an opportunity to do things differently for the strategic authorities that are starting to think about developing SDSs. Strategic authorities should create a plan for public participation at the same time as their plan for the SDS preparation process so that it's clear at what points they intend to involve the public, how, and why.

### Build relationships between planning and communications/engagement teams

Building strong relationships between planning and communications and engagement teams, and understanding of the other team's work, will be crucial to embedding good participation in the planning process from the very start. This may be helped by the influx of planners into new strategic authority teams, many of whom will come from local authority planning teams, and are therefore likely to have a good understanding of community engagement and experience to draw from.

"You need a really good comms/marketing/social media team that 'get it.'"

Strategic authority representative

<sup>146</sup> https://www.rtpi.org.uk/media/12613/planning-agencies-rtpi-2022.pdf

<sup>147</sup> https://www.rtpi.org.uk/policy-and-research/state-of-the-profession-2023/

# **BARRIER 2:** Existing pressures on resources mean that more resource-intensive public participation can feel like a stretch

The current lack of capacity for SDS development in strategic authorities detailed above is coupled with existing pressures on resources, including staff, budgets, and time. We heard concerns from combined authorities about their ability to deliver good public participation within this context, especially given the growing understanding amongst planners that the Government expects SDSs to be delivered within two years.

"The resources to do [engagement in the SDS] well aren't necessarily available."

### Strategic authority representative

## **ENABLERS**

### Invest early to reduce costs later on

Early and representative public participation will require more resources than traditional consultation methods. But the benefits for strategic authorities, as outlined on pages 30-34, far outweigh the cost. This kind of participation can also avoid costs further down the line by anticipating and dealing with issues earlier on.

The biggest investment of resources will be at the start. Over time, by establishing processes and guidance and learning from best practice, the process will become more efficient and less resource-intensive.

# **BARRIER 3:** Policymakers often have concerns about opening up the policymaking process

We know from our interviews with policymakers at the national level – former and current senior civil servants and ministers – as part of our Citizens' White Paper last year that there are a number of fears around opening up the policymaking process to the public, including that:

- It undermines the role of elected politicians and civil servants' expertise
- It looks like politicians shirking their responsibility or like they have no ideas of their own
- Politicians lose control of policymaking while retaining accountability for the policy
- If politicians ultimately choose not to listen to the public after inviting them to participate, this will further erode trust
- We heard some indications from those we spoke to that these fears will also play a role when it comes to public participation in the SDS.

"There is also a challenge between the role that politicians see they have representing the views of their community and having a panel of residents representing views – so that's a tension in the system."

### Strategic authority representative

# **ENABLERS**

### Make the case for public participation

We need to be clear why and how involving the public in an early and representative way will help improve the SDS and streamline the process, and help deliver politicians' vision in a way that builds legitimacy and trust from residents. See section 2 for more detail on our arguments.

As argued above, by setting and communicating clear parameters for the SDS, policymakers can ensure that the inputs into the process are more useful from the strategic authority's perspective, meaning that they're more likely to be reflected in the outputs from residents' perspectives.

# **SECTION 5** RECOMMENDATIONS FOR EMBEDDING EARLY AND REPRESENTATIVE PUBLIC PARTICIPATION IN STRATEGIC PLANNING

In this section, we set out our recommendations to government, strategic authorities and the Planning Inspectorate for how early and representative public participation can be embedded in the process of creating Spatial Development Strategies (SDSs).

## **RECOMMENDATION 1:**

The Government should create secondary legislation for the Planning and Infrastructure Bill to set guidance and expectations for strategic authorities on early and representative public participation

- While the Planning and Infrastructure Bill sets out minimal requirements for statutory consultation in the preparation of SDSs, it is possible for the Ministry of Housing, Communities and Local Government to set higher expectations through secondary legislation. Secondary legislation provides further details on practical measures that enable the primary legislation to be enforced and operate in daily life.
- The secondary legislation should set out guidance for strategic authorities on what good practice public participation could look like in the preparation of their SDS.
- This could include setting out at what point during the process the public could be involved and through what methods. We recommend using the Public Participation Model set out in this report below as a guide.

# **RECOMMENDATION 2:**

Strategic authorities should proactively adopt meaningful public participation as part of their process that is both early and representative

• In order to prepare an SDS that meets the needs of the widest range of residents, we recommend that strategic authorities use the Public Participation Model as set out below as a guide for how they can enable their residents to be heard. This is a model designed to show one route through the process and we recommend that they take the principles of participation at scale and at depth to guide the process appropriate for their context.

# **RECOMMENDATION 3:**

Strategic authorities should build an enabling culture for participation through training and a Community of Practice

This could include:

- **Training for strategic authority planners in public participation:** many strategic authorities' planning teams (where these exist) have little experience of engaging communities in their work. Therefore providing training on the basics of participation, its value, how and when to do it, and how to commission well would help them to undertake these processes with more confidence, and ensure that the outputs are of value.
- Training for strategic authority community engagement / communications teams in strategic planning: many engagement / communications teams are not confident in planning, so for them to engage communities in the SDS processes is hard. Giving these teams a basic introduction to planning and why it is critical to the future of the strategic authority and how preparation of the SDS could be used as an opportunity to build good community relations would be useful.
- Building a Public Participation Community of Practice: it would help strategic authorities undertaking public participation as they develop their SDS to learn from each other. A Community of Practice would enable them to share learning and what works/doesn't work. This could be led by RTPI, PAS, or another body.

# **RECOMMENDATION 4:**

Strategic authorities should evidence the public participation they have carried out in the final SDS that goes to Examination in Public

- For reasons of transparency and accountability, strategic authorities should explicitly set out how they have involved their public: this should include when in the process and how public input has shaped the draft SDS. Planning Inspectors will then be able to see how feedback raised by the public during plan preparation have been resolved through the process, and challenges mitigated early on.
- **Training for Planning Inspectors on public participation:** many Planning Inspectors would benefit from training in what meaningful public participation looks like so they can consider the public participation described in the SDS and determine whether they would like to call representatives of the public who have participated in the plan preparation to give evidence during the Examination in Public
- **Opportunity for public to feed in at Examination stage:** currently, the Examination in Public process is very opaque and hard for any but the most engaged members of the public to feed into, and even then, usually written representations only. The process could be made more transparent and welcoming of community input. This could include representatives from the community who have participated in the design of the SDS giving evidence about this and feedback on whether the strategic authority took account of their input.

# **RECOMMENDATION 5:**

Government, strategic authorities, planning authorities and communities should collaborate on experimentation in delivery of participatory planning, and evaluation, to provide evidence that participation can speed up the planning process

- While there is an emerging body of evidence around the efficacy of public participation in improving policymaking and increasing trust, the evidence base as applied to planning is patchy, as we have documented. This is inevitable as this is a new way of doing planning.
- We would urge central government to work with one trailblazing authority and the planning
  inspectorate to co-design an SDS from scratch with a representative group of citizens as
  active participants in the process. This "hackathon" or "sandpit" approach could fit within
  the Government's new Test, Learn and Grow programme which is piloting innovative ways
  to tackle challenging policy questions through by taking an accelerator approach to policy
  questions, bringing frontline workers together with policymakers, experts, the authorities and
  citizens to cocreate solutions.
- In trialling this different approach, we would also recommend independent evaluation to test whether this approach to public participation achieves more housebuilding in a shorter time compared with those who take a minimalist approach elsewhere. This would help to prove its efficacy beyond doubt to encourage widespread take up of the approach.

# **SECTION 6** A MODEL FOR EARLY AND REPRESENTATIVE PUBLIC PARTICIPATION IN SDS PREPARATION

# OVERVIEW

There is no single way to do good public participation in strategic planning, and so our proposals are not meant to be prescriptive or one-size-fits-all. Each strategic authority will be starting from a different context, resources, and level of existing public awareness of the authority. This model is therefore intended as a guide to how the public can participate in the preparation of the SDS for the benefit of the authority, the public, and the long term future of the sub-region.

At each stage of SDS preparation, we have set out critical success factors that should guide the delivery of public participation. We have also – in boxes – set out more detailed practical suggestions for a way in which it can be delivered. These detailed sections are intended to be read as one possible route only – there are many different ways in which strategic authorities can enable their citizens to participate, building on their specific local context and the work to engage their citizens that they already do. The key for each strategic authority will be experimentation to determine what works best in each context.

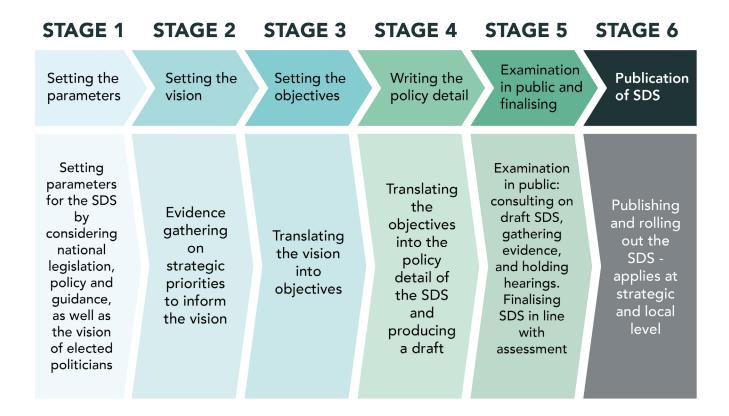
Based on the Greater London Authority (GLA) and Liverpool City Region Combined Authority's (LCRCA) experiences of developing SDSs, which the Government has drawn on in writing the Planning & Infrastructure Bill, we have identified six key stages in the development of an SDS:

- 1. Setting the parameters
- 2. Setting the vision
- 3. Setting the objectives
- 4. Writing the policy detail
- 5. Examination in Public of the draft SDS and finalising the SDS
- 6. Publication

In our Public Participation Model, we set out a process for embedding public participation in the five stages of SDS preparation from setting the vision to the point at which it is published and rolled out by the strategic authority:

# FIGURE 9

PUBLIC PARTICIPATION MODEL



At each stage, we describe the critical success factors that should underpin public participation as well as details of how a strategic authority could put this model into practice.

In designing the model, we have considered when and how to engage people at scale or at depth at appropriate stages. We have tried to make this model as deliverable as possible given the time and resources that strategic authorities are likely to have. There is no point in us setting out a gold-plated model that no strategic authority could implement to deliver so we have aimed for proportionality in the proposals.

As well as drawing on our fresh insights on barriers and enablers to better public participation in strategic planning, this model has been developed with in-depth advice and feedback from eight strategic authorities, as well as in-depth guidance from RTPI and the members of the advisory group. We have drawn on the learning from Liverpool City Region and the London Plan and considered how to take the best parts of these engagement processes and make them proportionate to the current needs of strategic authorities given the Government's expectation that SDSs are to be produced in about two years.

# OVERVIEW OF OUR MODEL FOR PUBLIC PARTICIPATION IN THE DEVELOPMENT OF AN SDS

To create meaningful but proportionate proposals, we have specified two key types of public participation at different stages of SDS development:

1. Participation at scale: this means going out as widely as possible, giving as many people as possible the opportunity to engage with the SDS production. This is a light-touch, quick engagement using a digital platform that takes minimal effort on the part of residents but gives them a hook into which they can engage with the SDS and with the strategic authority. It is good for getting input into a broad, simple question to set the overarching vision for the future of the area – a topic that most people can relate to – at the very beginning of the process.

When the SDS is drafted and out for the statutory phase of consultation, the people engaged in the first phase of scale engagement can be reached out to again to give them an opportunity to see the impact of their earlier input and feed in again at this final stage.

2. Participation at depth: this form of engagement goes deeper into the detail of the SDS preparation, getting into the more technical policies that the SDS will cover. It is harder to engage people at this stage, so a smaller but representative cross-section of the community is engaged and remunerated for their participation. We propose setting up a Citizens' Panel as the mechanism for this.

A Citizens' Panel is a representative, consultative body made up of members of the public which reflects the demographics in the relevant population – here, residents in the strategic authority area. Deliberation is the key methodology used – see pages 25-6 for more information. Panel members are brought together and given the time, space and information to deliberate on the issues and reach considered collective judgement.

We will set out in the details of the model below, including how and when to use these different forms of participation.

Clear, consistent communication by the strategic authority is an enabling factor that will ensure that the model works effectively.

# FIGURE 10

DIAGRAM SHOWING THE PUBLIC PARTICIPATION MODEL AGAINST THE STAGES OF SDS PREPARATION

	STAGE 1	STAGE 2	STAGE 3	STAGE 4	STAGE 5	STAGE 6
	Setting the parameters	Setting the vision	Setting the objectives	Writing the policy detail	Examination in public and finalising	Publication
What happens at this stage of SDS development	Setting parameters for the SDS by considering national legislation, policy and guidance, as well as the vision of elected politicians	Evidence gathering on strategic priorities to inform the vision	Translating the vision into objectives	Translating the objectives into the policy detail of the SDS and producing a draft	Examination in public: consulting on draft SDS, gathering evidence, and holding hearings. Finalising SDS in line with assessment	Publishing and rolling out the SDS - applies at strategic and local level
Participation level		Participation at scale	Participation in depth		Drawing on participation in depth	
How the public could participate in our model	This will provide clarity on parameters for public participation	Use digital technology to engage as widely as possible on the vision for the SDS	Set up a standing Citizens' Panel to develop citizen-led objectives for the SDS	Co-design the policy detail with the Citizens' Panel and experts	Citizens' Panel members to submit a representation on the draft SDS	Draw on community allies from the Citizens' Panel once the SDS is published

# CLEAR, CONSISTENT COMMUNICATIONS BY THE STRATEGIC AUTHORITY

Excellent external communications must run throughout the process to ensure:

- Participants understand what their input will be into the process, and what the parameters are for that input. There is no point in participants focusing on things that are outside of the scope of the SDS it's not helpful for those producing the SDS or for the participants as it means this input is less likely to be used, which may further erode trust.
- Participants understand how their input will be reflected in the output from the strategic authority at the start of the process. Once the outputs have been created, there needs to be a feedback loop on how their contributions are reflected in the output, or if they haven't been, the rationale for why not. This will build trust that the SDS reflects the views and needs of residents among those who have taken part, which can improve participant engagement and help create community allies when the SDS is examined and published. It can also create a sense of agency for participants that they can have a say in decisions on policies that impact their lives, and a connection with their communities and strategic authority area.
- Make sure that there is good broadcast communication to the wider community and stakeholders so they know that residents like them have informed the development of the SDS, and that there is transparency on what that looked like. This will build broader trust that the SDS reflects the views and needs of residents, as our polling shows (see page 29). However, there may be a need to consider specific messaging for residents who can be classified as NIMBYs and YIMBYs, given they are more likely to be neutral on or sceptical of our proposed approach to public participation.

Strategic authorities should ensure they include communications costs when resourcing public participation.

# PUBLIC PARTICIPATION MODEL IN DETAIL

# **STAGE 1:** Setting the parameters

Planning teams will undertake this stage regardless of the level of public participation they will do. It is a necessary precursor to starting work on the SDS and involves consideration of the national planning policies that the SDS must be in accordance with, as well as agreeing the scope of the SDS itself, within the parameters set out in the Planning and Infrastructure Bill.

The National Planning Policy Framework (NPPF) sets out national policy which is applicable to SDS preparation, supplemented by Planning Practice Guidance (PPG). This includes policy and guidance about plan making, what strategic policies should focus on, and what should be dealt with by non-strategic policies in parts of the statutory development plan other than the SDS.<sup>149</sup> Further detail about what the SDS should cover is contained in the Planning and Infrastructure Bill.

Within these parameters, the strategic authority planning team needs to agree the scope of their SDS. The most critical parameter is the housing number that has been calculated for the strategic authority area, which will be a consolidation of the housing requirements for all the constituent local authorities. This clarity sets useful guardrails for the public participation as it means that the public is clear from the outset about the quanta of housing that is required, and they can be asked to consider which locations across the strategic authority area they would prioritise for major housing developments, rather than opening up the question as to whether new housing should be built in the area.

Beyond this, the authority will need to be clear on what issues the public can input into, such as where employment and commercial sites should be located, adaptations for climate change, and locations for key infrastructure development, and what is outside the scope of the SDS. These need to be clearly communicated to the public, so as not to raise false expectations over where the public can play a role which leads to disappointment and a further loss of trust that the authority is listening.

At this stage, the authority will also need to set out their timetable for SDS preparation, which needs to be submitted to the Secretary of State for approval. This should include the points when the public will be engaged so this can be factored into schedules and resourcing.

Finally, this preparation stage should include resource planning so roles and responsibilities of different teams are agreed. For public participation, this means considering what will be done by the planning team, the community engagement team, and the marketing and communications team.

# **STAGE 2:** Setting the vision

### **Critical success factors:**

1. Anyone can take part

It's important that everyone has an opportunity to feed into the SDS at the beginning of the process, long before the statutory consultation stage when it has already been drafted. The SDS will set the principles of development for the area for the next 15 years or so, so it is important that this is a document that people have a sense of ownership over and buy into.

# 2. Aim for as many people as possible

The strategic authority should aim to engage as many people across the area as possible. This is not about reaching a perfectly representative cross-section of the community – this will be more of a focus in the in-depth participation stage – but broadly across all communities. This may mean using the strategic authority's communication channels and trusted messengers to reach out to make sure that people are aware of the SDS preparation process and know how to get involved. Given the limited resources of strategic authorities, it is fair to set realistic expectations, given the barriers to residents' participation as set out in section 4.

# 3. Make an effort to reach under-represented groups

Given limited resources, the strategic authority should consider targeting resources at communities otherwise least likely to be heard. This ensures that it is not only hearing from the most engaged. This is important for creating equity in the voices that get heard in politics, which will result in more balanced views, including on planning.

## 4. Make it easy to participate

Given the concerns about residents' ability and motivation to engage with strategic planning set out on pages 43-50, the strategic authority must ensure it is as easy to participate as possible in this stage. This means keeping the vision question simple, interesting and relevant so people will want to engage with it to input into creating the future area that they want to see. In addition, the platform on which people can engage needs to be as low effort to use and accessible as possible.

# Model Stage 2: Use technology to engage as widely as possible on the vision for the SDS

## What is the purpose?

- Crowd-sourcing input into the high-level vision for the area in 15 years' time
- Raising awareness of the SDS process and the strategic authority
- Encouraging widespread participation and buy-in for the process from across the area

## Who takes part?

As many people across the strategic authority area as possible, with a focus on reaching into under-represented communities

## How can you reach participants?

Publicise the opportunity to take part as widely as possible using channels such as:

- Strategic authority communication channels, including emails to residents, newsletters, website and social media
- Local press
- On-street advertising on bus stops and transport interchanges, public notice boards
- Via trusted messengers, including community groups that reach into underrepresented groups

### What question are you asking?

The question/s are for people to engage with at a high level, and therefore need to be interesting, relevant to anyone, and easy to respond to, focusing on the future of the area, avoiding technical language.

It could be one single question that allows you to capture people's ambitions and hopes for the future of the area. For example: 'What are your priorities for creating the best future for [Strategic Authority], or 'Imagine the best possible [Strategic Authority] in 15 years. What specific things will have happened in the area to make it so great?'

Or a series of high level questions to capture more specific responses to particular areas. For example, Liverpool City Region Combined Authority used Commonplace to ask broad, open-ended questions along six themes, including: "A Connected City Region: Tell us how we should be planning to make connections in the city region better and fit for the future" and "Environment and Climate Change: Tell us how we should be planning for a greener, cleaner city region and to meet the challenge of a changing climate."<sup>150</sup>

### What platforms can be used to capture feedback?

Use an online platform, such as <u>Commonplace</u> or <u>Polis</u>. Commonplace allows for more than one question to be asked, more like a familiar survey, as well as interactive maps, allowing participants to visually represent an area and make locational comments. Polis allows for just one question to be asked on a simple interface, but respondents can agree/disagree with each other's input and the AI powering the platform allows the areas of consensus and disagreement can be identified.

If you can also provide offline opportunities for people to participate as well, this is even better. This means that people who are not digitally connected can also take part easily. For example: this could be at drop-in sessions at public libraries, in stalls at shopping centres or leisure centres, or at community groups' meetings – in other words, places where people will be gathered anyway and where you can encourage those who would not usually take part to input their thoughts.

Al can be used to process and analyse residents' inputs so that you can draw out the main themes, hopes and ambitions for the area without using up a lot of staff resource, though there are data protection issues to resolve if using AI to analyse input.

## What is the output?

Ideally thousands of vision ideas from across the community that have been analysed for consensus and sentiment to feed into a high level vision for the strategic authority area that residents have a sense of ownership over. It is most likely that the vision will be made up of several themes that are the priorities that residents want to see changed over the next 15 years. For example, Liverpool City Region's vision for the area touches on seven priority themes, including climate change, health inequalities, inward investment and homes.<sup>151</sup>

150 https://lcrsds.commonplace.is/

<sup>151</sup> https://api.liverpoolcityregion-ca.gov.uk/wp-content/uploads/2023/12/735-LCRCA-Spatial-Development-Strategy-V11-ACCESSIBLE.pdf

### How to ensure clear, transparent communication?

The process of encouraging people to participate will also act as a way of raising awareness of the strategic authority and the SDS. This is a crucial stage at the beginning of the process so it is the most important time to invest in external communications to reach as wide an audience as possible.

### How much would this cost?

The external costs are estimated to be around £15,000-20,000 for participation at this scale using a platform like Commonplace. However, these costs could be spread across the strategic authority if the platform is used for other policy areas or issues.

Polis is a free platform with simpler functionalities.

### About the digital platforms:

<u>Polis</u> is a digital tool that can help large groups of people find areas of agreement. The platform operates as a 'Wikisurvey'<sup>152</sup>, meaning people who take part can vote on ideas shared by others, including the organisers, but can additionally introduce their own ideas. This way, the process will lead towards the direction that the community cares about, as opposed to a direction fully pre-defined by the organisers.

Participants have two ways to take part:

- 1. Vote on ideas shared by others, voting 'Agree', 'Disagree', or 'Pass/Unsure' on each statements
- 2. Share their own ideas in statements of up to 140 characters

The Polis system has unique algorithms that identify distinct groups of participants that emerge based on their shared voting styles. This system not only allows the organiser to better understand any groups with shared views within the larger public, but their inbuilt system also surfaces areas where all groups tend to agree, thus finding key points of consensus that garner the most shared support.

This system has been used around the world<sup>153</sup> in participatory experiments with international renown. Most famously, Polis has been used in Taiwan<sup>154</sup> to platform discussions between hundreds of thousands of people and directly influenced policy decisions made by the Government.

<u>Commonplace</u> is a digital citizen engagement platform designed to facilitate inclusive and transparent public participation in shaping the built environment. It enables authorities, developers, and planners to gather community feedback on proposed developments including housing and infrastructure.

Participants can engage in several ways including interactive mapping where users can drop pins on digital maps to indicate areas of interest, concern, or suggestions for improvement.<sup>155</sup> The platform also offers tailored questionnaires that allow residents to express their views on specific

<sup>152</sup> https://compdemocracy.org/Wikisurvey

<sup>153</sup> https://compdemocracy.org/Case-studies

<sup>154</sup> https://compdemocracy.org/Case-studies/2014-vTaiwan/

<sup>155</sup> https://www.re-dwell.eu/case-library/participatory-planning-re-examining-community-consultation-as-a-process-that-integrates-the-urbanroom-method-with-a-digital-mapping-tool

proposals or general community needs, as well as a mechanism for community members to submit their own ideas or comments, fostering a two-way dialogue between stakeholders and the public.

Commonplace uses AI-powered analytics to process and visualise the collected data, identifying key themes, sentiments, and areas of consensus. This insight helps decision-makers to understand community priorities and concerns, leading to better-informed and more accepted outcomes.

The platform has engaged more than 6.5 million people across the UK, having been utilised in over 3,000 projects<sup>156</sup> – from urban regeneration schemes in London to transport consultations in Leeds.<sup>157</sup>

# CASE STUDY SAN FRANCISCO BAY AREA<sup>158</sup>

Plan Bay Area 2050 is a long-term, regional plan for housing, transportation, economic growth and environmental resilience across California's San Francisco Bay Area – similar to an SDS being implemented by a UK strategic authority, as it outlines land use over a large area over a long time.

To inform the plan, the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) needed to engage people from across the San Francisco Bay Area – a diverse population of around 7.5 million residents – to gain initial insight before producing a draft plan, they sought to gain as much information and feedback as possible from the population, asking broad, vision-setting questions about the Bay Area, encouraging the public to consider and comment on their priorities across six high level strategic themes such as environment; people and community; economy and jobs; housing; transportation; and other.

Their engagement stage involved the innovative usage of various digital platforms, including a gamified model of planning engagement called "Mayor of Bayville". Aimed at young people, this was posted on Snapchat and Instagram, as they are more popular platforms for Gen-Z and Millenials. The game simulated land-use decisions and engaged over 3,000 residents across 84 out of 101 municipalities, with more than 9,900 comments revealing strong support for development that focused on strong transport links, which was later codified into the plan.

The planbayarea.org hub hosts resources in many of the area's common languages (English, Mandarin, Cantonese, Spanish, Tagalog, Vietnamese and Braille versions of written materials are available), real-time comment portals, and recordings of 10 public workshops, which collectively drew over 230 participants. Moreover, online surveys successfully collected input for residents: one survey alone garnered over 2,000 responses and over 23,000 comments.

<sup>156</sup> https://tech.eu/2023/06/14/uk-citizen-engagement-platform-commomplace-raises-2-1-million-to-ensure-the-built-environment-positively-impacts-communities

<sup>157</sup> https://www.the-get-it.com/engagement-and-consultation

<sup>158</sup> https://planbayarea.org/sites/default/files/documents/Plan\_Bay\_Area\_2050\_Public\_Engagement\_Report\_October\_2021.pdf

# **STAGE 3:** Setting the objectives

Once the vision has been set, the next step for creating the SDS is producing objectives. SDS objectives are overarching and thematic definitions of what its policies aim to achieve, responding directly to the key challenges facing the city region and aligning with the strategic priorities of the strategic authority.

For example, Liverpool City Region Combined Authority set out five thematic objectives to guide their SDS:

- 1. Tackling climate change and creating a cleaner, greener city region;
- 2. Reducing health inequalities and creating a healthier city region;
- 3. Increasing the city region's economic prosperity in ways that widen opportunities for all;
- 4. The creation of sustainable places and communities with the homes the city region needs;
- 5. Maximising social value from development.<sup>159</sup>

Each of these objectives are accompanied by more details that expand on how they will, broadly, be achieved. For example, objective 3 refers to access to digital networks, rejuvenating the city region's town centres, promoting a green and inclusive economy, and more.<sup>160</sup>

From this point onwards, participation will need to be more in-depth as greater detail is required to feed into the SDS. Fewer people are likely to be interested in investing the time to feed in in a more detailed way so we propose ensuring that a small but broadly representative group is engaged for the following two stages: Stage 2 (setting the objectives) and Stage 3 (writing the policy detail).

## Critical success factors for the next two stages are:

1. Recruit a small but broadly representative sample

To ensure the strategic authority hears a balanced range of views, it should hear from a broadly representative sample of its population at some point while developing the SDS. Given the write up of the detail is the most crucial stage, but also the most difficult to involve a more diverse group of residents in, due to its complexity, this is where it's most important to go in-depth with a broadly representative group. To keep costs manageable, the size of this group can be small as long as it's sufficiently representative.

### 2. Aim for considered, informed, collective judgement

As set out on pages 45-7, engaging residents on complex topics is difficult, but important and possible. Ideally, awareness and understanding needs to be raised at the population level. But within the confines of the process, there are a few key ingredients to engaging people in complex topics:

- Access to balanced information and expertise, presented in ways that are accessible to those taking part
- Sufficient time to consider the information and the opportunity to ask questions
- Sufficient time to discuss with others and hear differing viewpoints
- Strong but fair facilitation of the discussion to ensure that everyone's voice is heard
- Paying people for their time (see below)

<sup>159</sup> https://api.liverpoolcityregion-ca.gov.uk/wp-content/uploads/2023/12/735-LCRCA-Spatial-Development-Strategy-V11-ACCESSIBLE.pdf 160 https://api.liverpoolcityregion-ca.gov.uk/wp-content/uploads/2023/12/735-LCRCA-Spatial-Development-Strategy-V11-ACCESSIBLE.pdf

With the above support, participants will be able to reach collective judgement on the issue (even if not complete consensus) in a way that considers different perspectives and trade offs.

### 3. Incentivise participation

Offering remuneration is key. It provides an incentive to take part that isn't just an interest in the topic, which is usually the only incentive for taking part in a public consultation and is why the responses tend to be from people with already strong views on a policy, or with vested interests in it.

Remuneration also helps people overcome practical barriers to taking part, which are particular blockers for underrepresented groups. Participants should also be offered other support beyond remuneration to ensure they can take part, such as contributing to caring, travel or accommodation costs (if in person).

# Model Stage 3: Set up a standing Citizens' Panel to develop citizen-led objectives for the SDS

### What is the purpose?

To enable in-depth public participation in designing the objectives for the SDS.

It's important to note that this standing Citizens' Panel can be used for public participation in other policy areas, not just SDS development. Once set up and clear processes and guidance are put in place, the running of the Panel will be far less resource-intensive per policy issue. For a longer-standing Panel, we recommend refreshing the pool of participants regularly to ensure as many residents have the opportunity to take part as possible, and to avoid participants becoming 'mini civil servants' and therefore no longer representative of the public.

### Who takes part?

The Citizens' Panel is made up of residents who broadly represent the strategic authority area population. 24-30 participants would ensure sufficient representation by demography and by geography for most strategic authorities. Participants should represent a cross-section of the population in key demographics such as age, sex, ethnicity, socio-economic group, and housing tenure. We also recommend ensuring representation in terms of level of civic engagement to amplify the least heard voices, and hear more balanced views. It is also important that the panel is made up of people spread proportionally from across the local authority areas that make up the strategic authority, to ensure the whole area is represented.

Participants should be paid £75-125 a day and provided with support to take part in person (e.g. covering caring, travel and accommodation costs, and meeting accessibility requirements).

In addition to the participants, it's critical to have a range of experts/civil society groups take part to provide a balanced set of information and views to aid participants' learning on this topic, and stakeholders (such as politicians or different policy teams) take part at some point (for example, in the opening and final sessions, or to give evidence) to help build buy into the process and its outputs. We heard some concerns from strategic authorities that the current vocal minority may feel alienated by this different form of participation, and our polling shows that YIMBYs in particular may feel this particularly strongly as seen on page 32. Strategic authorities may want to consider involving some of these groups in the process as experts to give evidence and share information, ensuring that different viewpoints are represented.

# How are participants recruited?

Stratified sampling is key to ensuring that participants are deliberately recruited to be broadly representative of the population, rather than allowing self-selected groups to come forward. There are two main ways to go about recruitment: sortition is the gold standard, whereas market research recruitment methods may be more practical within strategic authority budgets as they are cheaper to implement.

Sortition would involve sending out invitation letters to a large number of randomly selected households in the strategic authority area. The letters set out what people are being asked to participate in, details of their remuneration and any other incentives, as well as an explanation as to what the strategic authority is doing by creating an SDS. From potential participants that register, based on the invitation, random stratified sampling is used to select the required number of participants who reflect the wider population of the strategic authority in terms of demographics, socio-economic characteristics and which local authorities they live in so that the Citizens' Panel is what's known as a mini-public as it represents the larger area in miniature.

Market research recruitment methods draw on recruiters' panels and networks to find the potential participants that they then narrow down using stratified sampling to broadly reflect the population's characteristics to create a mini-public. Recruiters' methods of finding participants vary, but include panels of potential participants, social media advertising, and word of mouth through networks. Potential participants would be provided with information on what they are being asked to participate in, details of their remuneration and any other incentives, as well as an explanation as to what the strategic authority is doing by creating an SDS.

# What will the Citizens' Panel be doing?

OBJECTIVE	EXAMPLE QUESTIONS / ACTIVITIES	TIME
Be briefed on the Panel, get to know each other, and explore people's initial views on the area and their personal visions for its future	<ul> <li>Where do you live? Who do you live with? What does your daily life look like?</li> <li>How do you feel about your area? What are your priorities for the area in the next 10-15 years?</li> </ul>	0.5 days

The Panel meets in person for a total of 4 days over a 2 month period to:

OBJECTIVE	EXAMPLE QUESTIONS / ACTIVITIES	TIME
Learn about planning and the SDS	<ul> <li>Through experts, learning about the planning system overall and how the SDS fits in</li> <li>Learning about what an SDS is and how it works</li> <li>Learning about the parameters that exist for the SDS e.g. national policy and guidance, strategic authority policy</li> </ul>	0.5 days
Learn about the vision and its key themes as created in Stage 1, and more detail about each of the themes	<ul> <li>Learning about the vision set out in Stage 1 of the SDS development process</li> <li>Learning from experts in each of the vision themes about how that vision could be achieved (e.g. housing, health, environment, economy, transport)</li> <li>Learning about the trade offs and competing viewpoints to be considered between the different elements of the vision (e.g. sustainability vs affordability)</li> </ul>	2 days
Deliberate and reach consensus on how to achieve the vision by creating objectives to meet each theme area	<ul> <li>How do you think [X] theme of the vision can be achieved in the SDS? What objectives need to be set?</li> <li>Using techniques such as Future Design Thinking and visualisation (see case studies below) to make the discussion feel more tangible</li> <li>Coming up with a longlist of objectives for each theme, with input from experts (e.g. from the planning team, public health team etc)</li> <li>Considering trade offs, and the impact of prioritising different objectives for each consensus on priority objectives for each theme</li> </ul>	1 day

### What is the output?

At the end of the sessions, residents will have come up with a short list of objectives for each theme that set out how the vision for the SDS will be met. For example, for each of Liverpool City Region's seven vision themes, they developed 4-8 objectives showing how the vision would be delivered.<sup>161</sup> The strategic authority should commit to using these citizen-led objectives as the official SDS objectives that guide the development of the policy detail.

In addition to the objectives, the sessions will have generated a wealth of data that will be relevant to other policy teams within the strategic authority, and potentially even local authorities. Consent should be obtained from participants to use their data for these other purposes to increase the value for money of this participatory exercise.

#### How to ensure clear, transparent communication?

Frequent communication with Citizens' Panel members is key to keeping them engaged, including following up on the result of their participation and impact on the SDS.

It's also important to communicate at the end of this stage with wider residents and stakeholders on the citizen-led objectives that have been developed, and how they were developed. For example, how residents were selected, what participants did, and what information was shared.

### How much would this cost?

The external costs are estimated at £65,000-£75,000 to commission an external organisation to run this phase, including design, managing recruitment and participant engagement, facilitation, analysis, and reporting findings.

If the strategic authority has an in-house research team, the external costs are estimated at £15,000-£20,000 for recruitment of 24-30 participants, participant remuneration and support, venue hire, and refreshments.

# **CASE STUDY** TORONTO PLANNING REVIEW PANEL

The Toronto Planning Review Panel was a representative group of 32 randomly selected members of the public from Toronto established in 2015, and given a two year mandate.<sup>162</sup>

The primary aim was to ensure that city planning initiatives aligned with the values and priorities of the people of Toronto by ensuring that diverse perspectives were considered in planning.<sup>163</sup> Panel members met approximately once a month, deliberated, and developed recommendations about issues including transportation plans, the city's climate strategy, and master plans.

The Panel used deliberative processes, including regular workshops and meetings where members discussed and deliberated on various planning issues, informed by presentations from independent experts and city staff to help understand complex topics.<sup>164</sup>

The issue being examined was typically chosen by Toronto's City Planning Division, and the Panel was given the opportunity to review and provide feedback on the project to the Planning Division and make recommendations on the direction of the project to ensure it aligned with the needs and values of the people of Toronto.<sup>165,166</sup> For example, in January 2016, the Panel published recommendations on City Planning's draft Townhouse and Low-rise Apartment Guidelines while in September 2016, the Panel published recommendations of Design Guidelines Project and the Toronto Ravine Strategy.<sup>167</sup>

According to DemocracyNext, the Panel has helped to create a sense of legitimacy and accountability for projects carried out by the city.<sup>168</sup>

<sup>162</sup> https://www.demnext.org/projects/cities

<sup>163</sup> https://static1.squarespace.com/static/6005ceb747a6a51d636af58d/t/601c1ae4c20f94356ad0f134/1612454667259/24.TPRP.pdf

<sup>164</sup> https://participedia.net/case/4594

<sup>165</sup> https://participedia.net/case/4594

<sup>166</sup> https://static1.squarespace.com/static/6005ceb747a6a51d636af58d/t/601c1ae4c20f94356ad0f134/1612454667259/24.TPRP.pdf

<sup>167</sup> https://participedia.net/case/4594

<sup>168</sup> https://www.demnext.org/projects/cities

# **CASE STUDY** FUTURE THINKING TECHNIQUES

Future Design Thinking (FDT) is a method that helps citizens plan for the long term by imagining themselves as future generations. Inspired by Indigenous decision-making principles that consider the impact of choices on people seven generations ahead, FDT was developed in Japan by economist Tatsuyoshi Saijo to counter short-termism in policymaking and embed long-term thinking into participatory processes.<sup>169</sup>

In typical Future Design workshops, local residents split into groups to consider a policy question or vision for their community. One group deliberates from the standpoint of current residents, focusing on immediate needs and preferences; the other group is invited to 'time travel' decades ahead – e.g. to the year 2060 – and imagine they are residents of the future looking back at today.<sup>170</sup> The 'time travellers' then debate policies with their present-day counterparts, bringing a new temporal perspective.

Studies of early trials highlight a striking pattern: when citizens take on the role of future inhabitants, they tend to propose bolder, more transformative plans for the community's long-term benefit; the people speaking as themselves in the present often prioritise short-term improvements or personal convenience.<sup>171</sup> In examples from Japan, the "future" groups advocated for ambitious investments (from climate action to major healthcare spending) that would pay off for the town over decades, even if it meant some sacrifice now, whereas the "present" group initially leaned towards immediate priorities. Through facilitated dialogue, the mixed group ultimately reached a consensus that acting against some immediate self-interests could be justified if it benefited their grandchildren's generation.<sup>172</sup>

FDT is a useful way of engaging people with long-term strategic thinking in an accessible, experiential way. By explicitly inviting citizens to represent future generations – effectively adding the dimension of time to public deliberation – FDT helps counter the natural tendency to favour short-term gains over long-term considerations.<sup>173</sup>

Its success in Japan demonstrates that, with the right facilitation, ordinary citizens are quite capable of thinking in four dimensions (space and time) about their area. For public participation in strategic planning – where an understandable instinct is for residents to first consider their hyper-local area and personal experiences in the present tense – FDT can make thinking about priorities for a wider area over multiple decades less abstract and more directly relevant for addressing in the plan.

<sup>169</sup> Saijo, T. (2020). Future Design: Bequeathing Sustainable Natural Environments and Sustainable Societies to Future Generations. Sustainability, 12(16), 6467. https://doi.org/10.3390/su12166467

<sup>170</sup> https://fdsd.org/ideas/future-design-japan/#:~:text=Future%20Design%20is%20a%20model,robes%20symbolizing%20a%20different%20 reality

<sup>171 &</sup>lt;sup>^</sup>https://fdsd.org/ideas/future-design-japan/#:~:text=Future%20Design%20is%20a%20model,robes%20symbolizing%20a%20different%20 reality

<sup>172</sup> https://www.vox.com/23870374/tatsuyoshi-saijo-economist-research-institute-for-future-design-future-perfect-50-2023

<sup>173</sup> https://www.souken.kochi-tech.ac.jp/seido/wp/SDES-2017-19.pdf

## **STAGE 4:** Writing the policy detail

Once the vision and objectives have been set, the real detail of the SDS needs to be developed. This is the most technical part, and so there will be a need to upskill participants, and work closely with experts who must continue to clarify the parameters and scope of the SDS.

#### Model Stage 3: Co-design the policy detail with the Citizens' Panel and experts

#### What is the purpose?

The Citizens' Panel will work together with experts to translate the citizen-led objectives into policy detail. The close involvement of experts will ensure the sessions are rooted in what is and isn't practically or politically possible. This will make it more useful for policymakers, and more rewarding for participants as their input is valuable and will be more likely to be reflected in the SDS.

#### What is co-design?

A co-design process is a collaborative approach to policymaking where diverse stakeholders, including policymakers, experts, members of the public impacted by the issue, people working in the sector, and potentially other interested parties, work together to design, develop, and/or implement policies.

The value of this approach is that the policy problem is understood from all different angles as the participants come from different points in the system (e.g. people who are designing, implementing, and being impacted by the SDS). Solutions designed through this process will therefore also work across the system.

#### Who takes part?

The Citizens' Panel is reconvened, with efforts made to keep retention of participants as high as possible to maintain the level of knowledge on strategic planning attained in the previous stage. Making the sessions enjoyable and interesting, and communicating frequently and transparently with participants are key to this.

Joining the Panel will be a mix of experts by profession, such as planners and relevant policy experts (e.g. housing, transport, environment, health). They will work alongside residents on an equal footing.

#### How will the co-design work?

Several 1-day in-person co-design workshops are held over a number of months, to work out the policy detail that is needed to deliver the objectives. The panel members may be split into working groups each focusing on a different area. As with the previous Citizens' Panel sessions, there will be a mix of learning and deliberation, the difference being that the conversations will be more technical, which is why it is important that experts by profession work side by side with Panel members. This co-design process may not look at every single issue or consider every bit of policy

detail, it might be more efficient and more productive for the participants for them to focus mostly on those issues that are of greatest interest to the public.

For example, questions that they might deliberate on could include:

- The distribution of housing What locations for major (strategic) new housing development should be prioritised? What overall strategy for new housing development should be adopted (e.g. spread out lots of small developments in different places, or focus development on fewer but larger sites)?
- The distribution of employment and commercial sites Where should the development of business spaces be prioritised? What urban centres should be prioritised?
- Investment in infrastructure and employment What patterns of investment are most needed across the city region?
- Climate change What types of adaptation strategy should be adopted? Where should adaptation investment be prioritised? Where should new energy infrastructure go?

#### What is the output?

Policy detail for each objective that has been worked up with Citizens' Panel members and experts. Policymakers will use this to write up the more granular detail to create the draft SDS.

#### How to ensure clear, transparent communication?

As above, there needs to be frequent communication with Citizens' Panel members, and transparency publicly about the Panel to other residents and stakeholders.

It will be even more critical at this stage for the strategic authority to provide clarity on how participants' input has been reflected in the SDS draft (or if some of it has not, explaining why not), given that the policy detail will be subject to more change than the objectives. This should be made clear to participants as well as wider residents and stakeholders.

#### How much would this cost?

The external costs are estimated at £60,000-£75,000 to commission an external organisation to run this phase, including design (with more technical detail than the previous phase), managing recruitment and participant engagement, facilitation, analysis, and reporting findings.

If the strategic authority has an in-house research team, the external costs are estimated at £15,000-£20,000. Most of these costs will be the same as for the previous phase. The key difference is that substantial recruitment costs won't be needed for this phase if most participants are retained, but there may be some external experts joining the co-design workshops that will require remuneration.

# **CASE STUDY** CO-DESIGN

In 2024, Earls Court Development Company (ECDC) developed proposals for the largest cleared development opportunity in London's Zone 1: a 40 acre site in Earls Court to deliver housing, economic infrastructure, as well as cultural and environmental spaces.<sup>174</sup>

To inform the process, the ECDC recruited the Public Realm Inclusivity Panel (PRIP) as its co-design partner to provide input into the initial drafting stage of design briefs as well as technical detail of design coding.<sup>175</sup> The PRIP was a diverse group of 22 people, aged between 14 and 80 who met over the course of 2 years to directly feed into the design process.<sup>176</sup> Members were paid for their time and supported to contribute meaningfully, with sessions facilitated in accessible and creative ways, from model-making and storytelling to site visits and group deliberation.<sup>177</sup> Crucially, the co-design was not symbolic: 25 members of the design and development team spent around 200 hours in attending PRIP sessions, incorporating the panel's feedback directly into evolving proposals for the site.<sup>178</sup>

# **CASE STUDY** USING VIRTUAL REALITY (VR) TO AID VISUALISATION

While detailed, complex documents can be inaccessible for many people, there are a variety of visualisation techniques out there that can help spatial planning feel more tangible and easier to understand.

One more innovative example is virtual reality (VR), which can be used to allow residents to step into a variety of proposed developments and experience them with their own senses. VR headsets transport the users to a different version of their area, cutting away the need for technical jargon; this immersive approach offers a more dynamic and realistic perspective than traditional architectural visualisations, giving users a more intuitive feel for the final design.

<sup>174</sup> https://www.festivalofplace.co.uk/index.cfm?404;/project-showcase/gallery-shortlisted-entries-for-the-pineapples-awards-2024/earls-courtroyal-borough-of-kensington-and-chelsea-and-london-borough-of-hammersmith--fulham-for-the-earls-court-development-company-with-hawkinsbrown-and-studio-egret-west

<sup>175</sup> https://issuu.com/earlscourtdevelopmentcompany/docs/statement\_of\_community\_involvement

<sup>176</sup> https://www.earlscourt.com/wp-content/uploads/2024/10/230208-ECDC-PRIP-Booklet-vol-1.pdf

<sup>177</sup> https://www.earlscourt.com/wp-content/uploads/2024/10/240610-ECDC-PRIP-Booklet-vol-3.pdf

<sup>178</sup> https://www.earlscourt.com/wp-content/uploads/2024/10/240610-ECDC-PRIP-Booklet-vol-3.pdf

This technology has been used by Digital Urban in Folkestone where it broadened adult and youth engagement in development planning: 10 times as many people participated in the digitally enhanced consultations compared to analog versions; over three quarters of participants had never before taken part in a consultation event.<sup>179</sup> Moreover, participation was broader and more diverse as it removed many of the barriers to entry for people who are often excluded from the planning process. There is no language barrier and no need for technical understanding.

In 2024, the Folkestone regeneration engagement won the Inspire Future Generations award from the Thornton Education Trust, specifically rewarding outstanding youth engagement.<sup>180</sup> Through the use of these VR tools, participants get a better understanding of proposals: 87% participants said they understood more as a result of the experience. There is also an empirical increase in feedback, diversity and the enjoyment of participants.

## **STAGE 5:** Examination and finalising the SDS

As outlined on pages 30-1, the examination stage is crucial in deciding the fate of the SDS. Early and representative public participation before this stage should reduce the likelihood of unanticipated issues arising, and the details of this public participation should have been vocally and transparently communicated so that participants, residents and stakeholders are clear on the role that people have played in shaping the SDS. However, it's important that people still have the opportunity to share their views once the document has been drafted.

As part of the pre-examination set up, a draft version of the SDS will be published for public consultation. Though the Planning and Infrastructure Bill only requires the strategic authority to consider notifying certain types of civil society groups, in our model best practice is to continue to ensure that as many people as possible are aware of the process and have a chance to make representations. Therefore, the public consultation should apply our critical success factors for engagement at scale as outlined on pages 63-4:

- 1. Anyone can take part The document should be publicly available and the consultation open to all.
- 2. Aim for as many people as possible However, the strategic authority should set realistic expectations of the number of people that will participate at this more technical stage voluntarily. That's why early and representative participation in the process is crucial.
- 3. Make an effort to reach underrepresented groups The strategic authority should make an effort to avoid only hearing from the most engaged groups. This time round, this should be easier as the strategic authority can use networks and relationships that it will have built at the setting the vision stage.
- 4. Make it easy to participate The draft SDS should be high level, no more than 100 pages, and written in accessible language with any technical terms explained.

<sup>179</sup> https://digitalurban.place/projects/folkestone/

<sup>180</sup> https://www.thorntoneducationtrust.org/ifgawards2024winnersandcommendations

# Model Stage 5: Citizens' Panel members to submit a representation on the draft SDS

In the evidence gathering phase of the examination, the various stages of public participation will contribute a wealth of evidence.

We also recommend the Citizens' Panel submit a representation on the draft SDS. In their contribution, they should set out to what extent they feel that their input, as representatives of the wider community, informed the final draft of the SDS, as well as considering to what extent the draft has met the vision and objectives that the community set. Ideally, Panel members would collectively select one of their fellow members to be put forward if they are asked to participate in the examination.

There are recommendations on how to ensure the examination stage takes public participation sufficiently into account in section 5.

#### **STAGE 6:** Publication of the SDS

At this point, to increase trust in and legitimacy of the SDS, there needs to be vocal communication about the role of residents in the development of the SDS.

At present there is no guidance for the publication of the completed SDS other than that the Strategic Planning Authority must publish the SDS along with a statement that confirms its adoption.<sup>181</sup>

# Model Stage 5: Draw on community allies from the Citizens' Panel once the SDS is published

The Citizens' Panel will likely give the strategic authority some natural allies in the community through members who have enjoyed taking part and been inspired to be more politically active and engaged, as is often the case with participatory exercises such as Citizens' Assemblies.

As long as they are comfortable not being anonymous, the strategic authority could draw on some of the Citizens' Panel members when communicating externally about the SDS, including at a local authority level, to increase its legitimacy and trust that it represents the wants and needs of residents. Members could tell their story about participating and what the experience meant to them. It will be important to support members to do this and only support them to speak publicly about their participation if they would like to do so.

#### How to ensure clear, transparent communication?

Once the final SDS is published, as with the draft SDS, the strategic authority must make the feedback loop between participant input and the output clear to help build up the trust between residents and the strategic authority that the authority is listening and acting on resident input.

<sup>181</sup> https://publications.parliament.uk/pa/bills/cbill/59-01/0196/240196.pdf

# **CASE STUDY** CITIZEN ACTION AFTER A CITIZENS' ASSEMBLY

In France, a Climate Citizens' Assembly (*Convention Citoyenne pour le Climat*) was set up in 2019, commissioned by President Emmanuel Macron, made up of 150 members of the public selected by lot, and chosen to reflect the population's demographics.<sup>182</sup> Initially, Assembly members were scheduled to meet over the course of six weekends, but members requested a seventh session.<sup>183</sup> Additionally, after the Assembly, participants worked together to set up a charity called 'Les 150', in part to monitor the results of their proposals, which led to the creation of a monitoring tool.<sup>184</sup>

## POST-PUBLICATION: INDEPENDENT EVALUATION OF THE PROCESSES

To make the case and realise the benefits of public participation nationally, each process should be independently evaluated and benchmarked against traditional forms of consultation in planning in order to gather rigorous evidence of the impact of public participation.

<sup>182</sup> https://cast.ac.uk/wp-content/uploads/2025/03/CITIZENS-CLIMATE-ASSEMBLIES-CAST-July-2021.pdf

<sup>183</sup> https://www.knoca.eu/national-assemblies/french-citizens-convention-on-the-climate

<sup>184</sup> https://cast.ac.uk/wp-content/uploads/2025/03/CITIZENS-CLIMATE-ASSEMBLIES-CAST-July-2021.pdf

# CONCLUSION

The Government's housebuilding agenda is ambitious. Bringing citizens along on the journey will be crucial to delivering this agenda in a way that gets people to think beyond their individual considerations in the here and now and towards finding areas of consensus with others living in their area that are fit for the future.

So far, the Government has gone for a less collaborative approach by going on the attack against the 'NIMBYs'. Our research suggests the Government's oppositional approach is backfiring: public opposition to housebuilding is already rising.

This report proposes an alternative: instead of giving the public less of a say at all, we make the case for less 'tick-box' public consultation and more early and representative public participation in planning to enable us to hear from the whole community, not just vocal minorities. This report sets out why and how to deliver this, specifically as part of the new requirement for strategic authorities to put together Spatial Development Strategies (SDSs).

However, the real work is only just beginning. The Public Participation Model we have set out is there for strategic authorities to use and adapt to fit their specific context, but ultimately it will be up to them, individually or ideally as a group, to continue to shape the model and innovate for years to come. Humans are complex and contradictory, which goes for the public being involved in policymaking, as well as those who already make and decide policy. Strategic authorities must make space to learn from successes and failures, and iterate.

This may all feel far from strategic authorities' minds at the present moment. Our research has found that many don't yet have a planning team, nor have thought about developing an SDS, let alone considered public participation. Many of the strategic authorities that will be required to develop SDSs don't even exist yet.

But a blank slate also means an opportunity to do things differently. Strategic authorities should embed early and representative public participation into the SDS development process from the very start. Too often, public participation is an afterthought, rather than a core element of the planning process, intended to make the process better.

What we're proposing will both make it possible for residents to have a meaningful and constructive say in planning, and for planners and policymakers to hear a more balanced set of views that can help anticipate issues earlier on. It will help build the trust of residents in their strategic authorities to deliver policies that work for them, as well as the trust of strategic authorities in their residents as constructive partners in making better policies, not merely the passive recipients of policy decisions.

# APPENDIX METHODOLOGY

As part of this research, we undertook quantitative and qualitative research to set out and analyse the existing policy landscape and explore the views and experiences of important stakeholders – including planning practitioners, strategic authority staff, experts, academics, and ordinary people – to help design our proposals.

In line with Demos's commitment to building a more collaborative democracy, our research methodology aims to put people at the heart of policymaking using deliberative and participatory methods.

## DIVERSITY, INCLUSION, EQUITY, AND JUSTICE (DIEJ) STATEMENT

As part of Demos's ongoing efforts to facilitate greater diversity, inclusion, equity and justice in all areas of our work, we assess and publish our approach to meeting our goals in each of our publications.

At Demos, we put people at the heart of policymaking to make better policies, strengthen citizenry and bring back trust in politics. We need the policymaking process to be more diverse, inclusive, equitable, and just in order to achieve these things.

Our commitment to Diversity, Inclusion, Equity, and Justice (DIEJ) is at the heart of our strategy, and our charitable purpose. Our ambition, in an age of division, is to be "radically inclusive", seeking out the voices that are otherwise left behind.

We embedded DIEJ considerations into this research by:

- Ensuring that the experts we engaged represented a range of views and sectors to challenge and help shape our thinking.
- Getting input from the public on our proposals and amplifying their voices in our report through:
  - Holding Citizens' Conversations with diverse and broadly representative groups of residents living in combined authority areas to ensure that we had in-depth insights from the people who will be impacted by our proposals. To ensure our groups were broadly representative of their respective populations, we used recruitment quotas based on population data, remunerated participants to make it more accessible for the majority of people, and offered support/adjustments in relation to technological and accessibility needs.
  - Conducting nationally representative polling to get input on a larger scale from the people who will be impacted by our proposals.
  - We designed our work with the public with accessibility and simplicity in mind. In the

Citizens' Conversations, we used our facilitation expertise to ensure that all participants had the opportunity to contribute in a safe and comfortable environment. We will also be sharing the published report with Citizens' Conversations participants so that they can see how their input has shaped our research.

- Making the report publication accessible through ensuring we use 'plain English' as far as possible and employing accessible design practices such as:<sup>185,186,187,188</sup>
  - Using structured headings (H1, H2, H3) and built-in styles
  - Using sans-serif fonts at a minimum of 12pt
  - Ensuring high colour contrast
  - Using labels in addition to colour in graphs
  - Limit use of tables for layout
  - Adding alt text to images and mark decorative ones accordingly
  - Using clear, descriptive hyperlink text
  - Exporting as tagged PDFs and validate accessibility settings
  - Testing with screen readers and accessibility tools

## STAKEHOLDER ENGAGEMENT

To inform our understanding of the planning and participation landscape, we spoke to a wide range of stakeholders, policymakers and experts in the fields of housing policy, planning, and public participation. This includes our advisory group as well as representatives from nine strategic authorities who we engaged through interviews, discussions, and a roundtable. Our recommendations and model have been developed in collaboration with these stakeholders to ensure it is practical and realistic.

## CITIZENS' CONVERSATIONS

In January 2025, we held 'Citizens' Conversations' to inform the development of our proposals. There were two separate groups: one group with residents of Liverpool City Region Combined Authority (LCRCA) and one with residents of West Midlands Combined Authority (WMCA).

#### Purpose

The purpose of this deliberative exercise was:

- to gauge existing levels of awareness, trust, and understanding of their Combined Authority, planning, and specifically strategic planning;
- to identify barriers and enablers to effective public participation in strategic planning;
- to workshop ideas for public participation by testing how the participants engaged with extracts of an SDS and approached the process of setting objectives and making trade-offs for their area.

AbilityNet. (2023, May). Creating accessible documents. https://abilitynet.org.uk/factsheets/creating-accessible-documents-0
 Analysis Function Central Team. (2020, October 29). Making analytical publications accessible. Government Analysis Function. https://analysisfunction.civilservice.gov.uk/policy-store/making-analytical-publications-accessible/

<sup>187</sup> GOV.UK. (2024, August 18). Publishing accessible documents. Guidance: Publishing accessible documents. https://www.gov.uk/guidance/ publishing-accessible-documents

<sup>188</sup> Ojenike, T. (2024, October 25). How to create accessible reports: A comprehensive guide. Venngage. https://venngage.com/blog/createaccessible-reports/#:~:text=Use%20link%20text%20that%20clearly,purpose%20without%20needing%20extra%20context.

## Sample

We recruited 14 people living in the LCRCA area and 14 people living in the WMCA area, who were all remunerated for their time. Within each group, we recruited a representative mix in terms of demographics (e.g. gender, age, ethnicity, socio-economic grade, disability status), and level of experience of civic engagement, as defined by the Community Life Survey,<sup>189</sup> for their respective combined authority area. We also ensured that each group of 14 had at least one representative from each of the constituent Local Authorities.

### Pre-session and post-session questionnaires

Prior to the online sessions, participants completed a baseline survey measuring how connected they felt to different geographic areas (your street, your local council, etc.) using a Likert scale, with follow-up questions exploring their strongest and weakest connections. The same survey was repeated after the sessions to track any changes in responses.

#### Sessions

Each group took part in a single 150-minute online session, beginning with introductions and then splitting into broadly representative breakout rooms. Discussions first focused on participants' sense of connection to their local area and their awareness and understanding of their combined authority. We then looked to establish participants' awareness and understanding of planning and strategic planning, exploring participants' views and potential interest in being involved. After a short break, participants engaged in deliberative exercises to set priorities for their area and explore trade-offs. We tested ways of engaging with planning materials adapted from real Strategic Development Strategies (SDS), and worked with participants to understand how forms of engagement could be improved. The sessions concluded with reflections on barriers and enablers to public involvement, including what would encourage future participation on this issue.

## POLLING

We commissioned a nationally representative, UK-wide poll of 2,081 respondents that was conducted from 4th-6th April 2025 by Yonder Data Solutions. Throughout this report, we generally have reported the England only data (n=1724) as the planning systems differ between the nations and the opportunity for public participation that this report focuses on (Spatial Development Strategies) apply only to England. The only exception is when reporting the NIMBY/YIMBY/MIMBY data to increase comparability with Labour Together's original polling in September 2024, which was done on a GB-wide scale (n=2018).<sup>190</sup>

## NIMBY/YIMBY/MIMBY classification

We replicated Labour Together's question, which assessed the extent of support or opposition to housebuilding in the respondent's local area under each of the following scenarios:

- Homes can be built on greenfield as well as brownfield sites
- Homes are only built in the most densely populated areas of your locality
- Planning regulations and rules for developers are strengthened (e.g. on providing affordable housing, GP surgeries and other services) to get more community benefits
- Anyone would be able to buy any of the new homes without any of them being specifically reserved for local people
- 189 https://www.gov.uk/government/statistics/community-life-survey-202324-annual-publication/community-life-survey-202324-civic-engagement-and-social-action

<sup>190</sup> https://www.labourtogether.uk/insights/britain-a-nation-of-mimbys

- A share of new homes built would be at prices that were affordable for someone on the local average wage
- Many of the new homes are small and have no access to a garden
- The new housing development created significant traffic congestion in the local area
- The new housing development had a positive impact on the character and appearance of my local area
- Funding was provided by central government to invest in local transport infrastructure, including roads and public transport

We then replicated Labour Together's classification to identify the number of NIMBYs, YIMBYs, and MIMBYs in the population. NIMBYs were classed as those who supported housebuilding in their local area under only one or zero scenarios, YIMBYs under almost all scenarios, and MIMBYs under some scenarios.

However, given that we used a different panel provider to Labour Together's original polling (which was conducted by YouGov), the direct comparability of our findings is limited. Nevertheless, we found changes that were well outside of the margin of error, and other polling that backed up these findings, as can be seen on page 16.

## Purpose

The aims of the poll were to:

- quantify public awareness of combined authorities;
- quantify public attitudes towards planning and housebuilding;
- quantify public awareness and understanding of the current processes for involvement in planning, levels of engagement with planning and housebuilding in their local area, and the extent to which they would like to have more of a say on planning and housebuilding;
- test whether our proposals for public participation in strategic planning would have an impact on the public's perception of the plan, and their likelihood to partake in acts of civic engagement in relation to planning and housebuilding.

## Testing our proposals

To test the impact of our proposals, before viewing and answering the final two questions, we split the sample into two halves (each nationally representative): Sample A (who viewed an explanation of our proposals) and Sample B (who did not view an explanation of our proposals).

Sample A viewed the following:

Imagine a regional plan is being developed by a local government body that covers [London - LONDON ONLY/the region you live in - ALL OTHERS]. It will set out how land in this area is used and developed over the next 15 years, including the amount of new housing and where it should go.

As well as speaking to a variety of groups who may be impacted by the plan, the Government body gives everyone who lives in the area, including you, an opportunity to have a say, and brings together a representative group of ordinary residents - people like you - from across the area to help shape the detail of the plan. This group would be given access to high quality, balanced information and expertise, time to consider and discuss that information together, and then make recommendations as a group about the plan. The Government body would take these recommendations into account when putting together the plan. The rest of the public have the option of commenting on the plan when a draft version has been put together. This would involve reading a document online with around 100 pages and leaving feedback. The local government body would take this feedback into account when finalising the plan.

Sample B viewed the following:

Imagine a regional plan is being developed by a local government body that covers [London - LONDON ONLY/the region you live in - ALL OTHERS]. It will set out how land in this area is used and developed over the next 15 years, including the amount of new housing and where it should go.

The public have the option of commenting on the plan when a draft version has been put together. This would involve reading a document online with around 100 pages and leaving feedback. The local government body would take this feedback into account when finalising the plan.

This allowed us to test whether exposure to our proposals has an impact on public attitudes to whether the plan represents the views and needs of current residents and their likelihood to take one of the listed actions as a response.

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# DEMOS

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© DEMOS. SOME RIGHTS RESERVED.
15 WHITEHALL, LONDON, SW1A 2DD
T: 020 3878 3955
HELLO@DEMOS.CO.UK
WWW.DEMOS.CO.UK