

Lewisham Developer Guidance

June 2024

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1 Introduction (what is this guidance and who is it for?)

We have prepared this guidance to build upon the expectations and requirements set out within the Statement of Community Involvement (2023). Here we set out our expectations for why and how all developers can improve community and stakeholder engagement at the earliest stage of scheme development. We explain what we mean by stakeholders in Section 5.

We strongly support the conviction of the National Planning Policy Framework that early engagement has significant potential to improve the efficiency and effectiveness of the planning process and improve outcomes for all parties. Fundamentally, early engagement leads to better development, which creates better places.

Because of the benefits, which we outline in Section 2, we expect developers of all types of schemes to take part in consultation and engagement with stakeholders. Even if your scheme is only for one or two new homes, we expect you to follow the principles of good consultation and the different types of engagement, set out in Sections 6, 7 and Appendix 1 respectively, in a proportionate way.

We also support the concept of Social Value, which we explain in Section 3. Throughout this guide we emphasise the importance of Social Value, and for it not to be treated solely as a metric but as a genuine opportunity to improve the lives and opportunities of existing and future residents and the environment.

There are many examples of good community engagement in Lewisham, and we provide an example case study in Appendix 2. We also explain, in Section 8, the information you as a developer should supply to show the engagement you have undertaken and how it has positively influenced the evolution of your proposals.

In Section 9 of this document we advise that engagement does not stop at submission of planning application, and that post decision engagement especially during construction is important.

2 What are the benefits of consultation?

There are several benefits of consultation for you as a developer. Engaging early with people near your site, with local communities and with other stakeholders has significant potential to improve the efficiency and effectiveness of the planning application process to your benefit and the benefit of all parties. Think of this in terms of starting slower to go further, faster.

When done well, your engagement should increase the level of transparency, develop relationships, and shape the project by considering and responding to feedback. As a result, this should help in overcoming planning issues and reduce your planning risk. Another key benefit of good engagement is better scheme outcomes: local communities and stakeholders hold local knowledge that can add value to your scheme.

When consultation is not done, or not done well, you miss your opportunity to build trust with the community, sometimes resulting in crisis management. It can often negatively affect the outcome of a planning application. You can also be at risk of reputational damage.



Increases stakeholder awareness



Public feel part of decision-making process



Encourages meaningful input and feedback



Develops a better grasp of public opinion



New ideas are generated and evaluated



Builds trust between organisations and stakeholders



Improved risk management and project efficiencies



Helps public process changes before they occur

3 Social Value

What is Social Value and why is it important?

The term Social Value is increasingly being used within the Built Environment and construction industry. The term Environmental, Social and Governance (ESG) is also used. These are typically linked to procurement and finance matters. Social value is broadly defined by the [Public Services \(Social Value\) Act 2012 \(Act\)](#).

We want to take Social Value further, so that it is an integral consideration as part of the overall Development Management Process to ensure the impact of development in the borough is positive for our residents, businesses, visitors, heritage, economy, and environment.

We see Social Value as the delivery of lasting positive change. Not just a singular metric for success, a one-off financial payment or one-off positive moment. This is the clear message of this guide.

To help you further understand how you can positively influence development, this protocol guide explains the role of Developers/applicants, the Council, and the public in contributing to delivering good Social Value.

The role as a Developer/ Applicant and Applicant professional team:

As developer you must:

- Consider yourself a partner in the local community and how you can empower communities with skills, knowledge and the tools to enable them to participate.
- Consider how you can deliver projects that create lasting positive change.
- Consider what communities and places need and want.
- Evaluate how wellbeing can be incorporated into design.
- Evaluate how you can collaborate with your neighbours and wider community to enable trust.
- Ask yourself can positive change be delivered in the short and medium term?
- Ensure you listen to and gain local knowledge and expertise from the community.
- Give equalities a central role in engagement strategies.
- Recognise the complexity of the planning system, and ensure communities understand the planning framework and associated rules.

The role of Lewisham Council

The Council has published a Public Services Social Value Policy. In addition to this, officers will:

- Engage with developers via our pre-application service to provide informal comments on development proposals and how their schemes meet policy objectives, noting that we cannot promote schemes on behalf of a developer.
- Review Developer Engagement strategies and provide key contacts for local and other stakeholders.
- Advise on the Developer Equalities strategies including the Fairer Lewisham Duty which can assist with equalities monitoring so that social and economic background are considered alongside protected characteristics (see section 7 for more information).
- Advise on relevant corporate strategies and engage with other Council teams.

The role as a member of the public

You can contribute to the delivery of social value by:

- Attending developers' engagement events, engaging verbally and via feedback forms
- Imparting your local knowledge and expertise.
- Making clear what you think, be it positive, neutral and negative about a site or an area. What are your aspirations for the area?
- Advising what you think your local area needs.
- Letting your comments be known to your local ward councillor.

4 What is good consultation and how to embed Social Value?

For consultation to be considered “good”, it should meet several key principles

Early engagement: You should engage with stakeholders as early as possible in the planning process before plans are completed. This allows people to give their input when it can still make a difference, and it helps you to better understand and address concerns before they become major issues.

To embed Social Value: Your early engagement should provide the public with the opportunity to provide feedback on how an area currently functions – what they consider is positive, neutral and negative and what they consider their area or neighbourhood needs.

Meaningful participation: Your consultation should provide stakeholders with a real opportunity to participate in the planning process. This means giving clear information about your proposed development, facilitating discussion and feedback, and responding meaningfully to stakeholders’ concerns within reasonable timeframes (proportionate to the

scale of scheme proposed). As developers, you should consider yourselves as partners in improving the borough’s neighbourhoods and places. The engagement with communities should empower their knowledge of the planning and engagement process which can be difficult to comprehend.

Accessibility: your consultation should be accessible to all stakeholders, including those who may face barriers to participation, such as people with disabilities or those who do not speak English as a first language, or have child caring responsibilities or face digital exclusion. This may require you providing translation services, arranging transport, or making other accommodations as necessary. Engagement should be held at accessible times – and do not expect communities or individuals to commit onerous time commitments.

Transparency: You should be transparent about your plans and the consultation process. This means providing clear and accurate information, being open to feedback and criticism, and explaining how you will use stakeholders’ feedback.

Evaluation: Your consultation should be evaluated to determine its effectiveness and to identify areas for improvement. This includes gathering feedback from stakeholders on their experience of the consultation process and using this feedback to improve future consultation efforts.

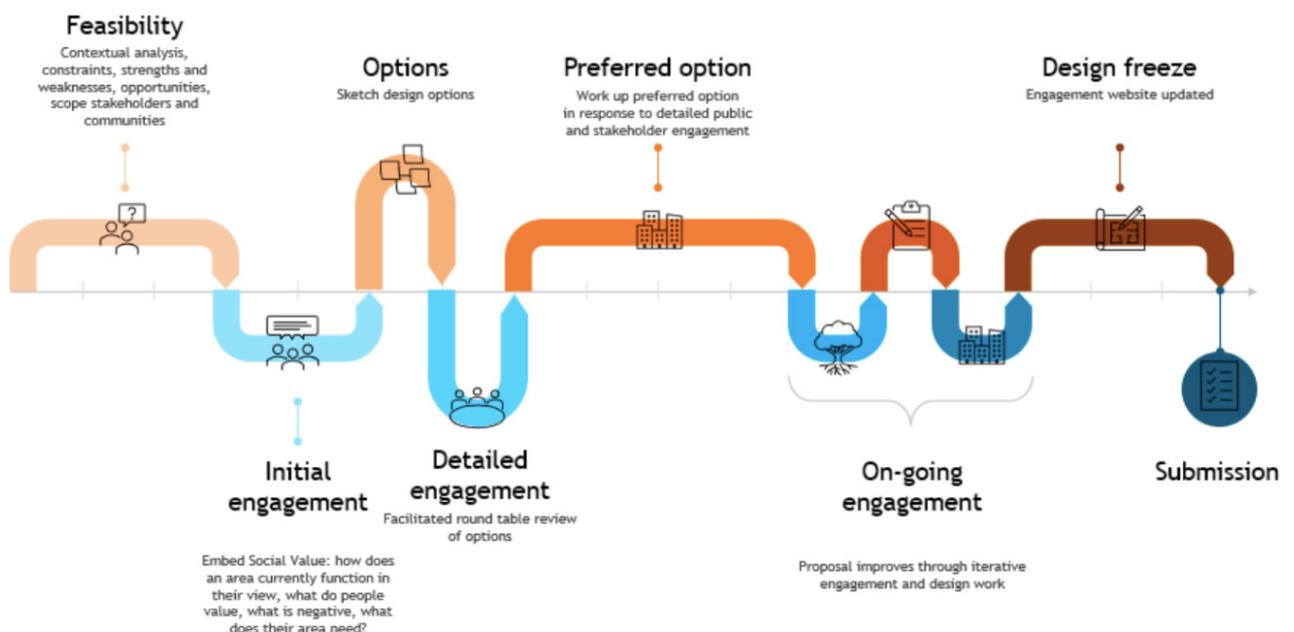
Another way to understand the principles of good consultation is to consider what is bad consultation.

Bad consultation often takes the form of the “decide-announce-defend” approach. This involves making plans behind closed doors, announcing it to stakeholders, and then defending it if, or more likely when, challenged. This approach prioritises efficiency and assumes that you have all the information and expertise you need to make the best decision and that people will eventually accept the decision if it is well-communicated and defended. If you only ask people what they think when you have already made up your mind, you are taking an elevated risk. That risk takes the form of potentially greater resistance to a scheme, but if you take the “decide-announce-defend” approach, you also do not harness the benefits of good engagement.

In contrast, the “announce-discuss-decide” approach involves announcing your intentions early on, then engaging in discussion and consultation with stakeholders before making a final decision. This approach prioritises engagement and harnesses the valuable insights and perspectives that local communities and stakeholders have to help improve the scheme and widen and optimise its benefits. It also acknowledges that involving stakeholders in the process can help build support and trust.

Overall, good consultation is for you to consult early, widely and clearly to capture a balanced and informed response. By following these principles, you can access the benefits of consultation.

Example engagement roadmap



5 Who to consult

It is important you engage with as many members of communities affected by your development proposals as possible. These should be from a diverse cross section of all local communities.

All your community engagement must be compliant with the Equality Act 2010. You must have regard for all protected characteristics, and we advise you that discrimination which is against the Equality Act is unlawful.

The protected characteristics of the Equality Act 2010 are:

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

You should engage with:

The following is a non-exhaustive list of communities you should identify and include:

- Local residents in the vicinity of the site, having consideration for 'rarely heard voices'. In all circumstances, you should ensure that all immediate neighbours have been included.
- Ward Councillors
- Users of a site and the local area – workers, students, tourists
- Neighbourhood Forums
- Amenity Societies and Community groups
- Business leaders
- Faith groups
- Friends of Parks and Gardens
- Where relevant, statutory consultees such as the Environment Agency or Sport England

You should contact us via our pre-application service for advice on the communities and groups to engage.

The London Forum of Civic and Amenity Societies, who are a pan-London organisation that represent views and interests of amenity and civic societies, holds a register, with contact information, of all affiliated organisations in Lewisham.

You should not apply an arbitrary measure for 'vicinity' of a local area and should discuss the scope of consultation with us via our pre-application engagement.

6 Types of engagement

How you engage will be proportionate to the nature of your proposal. It will also depend on the area: Lewisham has a diverse and rich fabric of communities spanning the borough. A 'one size fits all' approach will therefore not gain the most from consultation. In order to effectively engage, firstly you must understand the community and develop a bespoke and appropriate engagement strategy.

The primary aim of developing an engagement strategy is to ensure that your activities have a clear purpose, involve the right people and groups at the right time, and allows the public to play a positive part in the project development.

You should consider the following questions to help develop an appropriate and proportionate approach that will gain the most value from engagement:

How significant is my scheme and what is the perceived level of community interest? This will help determine the breadth and depth of the approach.

When is the right time to consult? For many schemes it will be beneficial to hold an earlier 'concept' round of consultation, followed later by more in-depth consultation as the plans start to crystallise.

What is the community make-up and how can I engage with all communities? An understanding of local communities and groups will help to identify the most appropriate way of engaging with all communities. Local ward councillors are active civic leaders who can help with identifying those groups.

Who do I need to consult? The concept of good consultation requires developers to consult with a number of statutory consultees where appropriate. However, are there any additional non-statutory groups who would add benefit to the project development through engagement? We give some advice in Section 6 above.

What tools and techniques can be added to the minimum level to gain more value through the consultation process? Methods can range from additional awareness - raising activities, to digital tools, to public events.

How will comments be recorded, reported and considered? It is good practice to develop a system to respond to comments and establish how they will be recorded. This will feed into the Statement of Community Involvement submitted with the planning application.

There are several engagement and consultation methods that you can use to effectively engage with stakeholders. Here are a few:

Public exhibitions: Organising public exhibitions is a great way to engage with stakeholders and provide them with an opportunity to view and discuss plans for a development. You can display drawings, plans, and other visual aids to help stakeholders understand the proposed development and provide feedback.

Community meetings: You can hold meetings with community groups, residents' associations, and other local stakeholders to discuss the proposed development and gather feedback. These meetings can be held in-person or online and can provide a forum for open discussion and information sharing.

Surveys and questionnaires: You can use surveys and questionnaires to gather feedback from a wide range of stakeholders. These can be distributed in-person, online, or through the post, and can be designed to gather specific feedback on aspects of the development such as design, access, and environmental impact.

Social media: Social media can be a useful tool for engaging with stakeholders and sharing information about the proposed development. You can use social media platforms such as Twitter/X and Facebook to provide updates, answer questions, and gather feedback from stakeholders.

Website: Setting up a website enables you to put your plans in an easily accessible format for a broad range of people to engage with. Add a comments page and the ability for people to register with you if they wish to receive further updates and to receive personal invitations to other events you may hold.

Digital tools: You can use a digital platform such as Commonplace or CitizenLab. These platforms offer a range of tools and features that enable communities to engage with your plans, such as giving feedback (in the form of comments, suggestions or ratings), data analysis, communication, and transparency.

Stakeholder workshops: You can hold stakeholder workshops to bring together different groups of stakeholders and facilitate discussion and collaboration. Workshops can be designed to address specific topics or issues related to the proposed development and can help to build relationships and trust between developers and stakeholders.

Site notice/notice board: another simple but effective way of drawing attention to your plans is to put up notices near the site. Include a site plan and a summary of your proposal and add a QR code to link to your website.

Letters/newsletters: a simple way of drawing attention to your plans is to write to or leaflet surrounding properties advising of potential development ideas and how to make contact.

The council can assist engagement through its published newsletters and Lewisham Life.

The above examples are what we consider good and collaborative engagement, we do of course expect that developer’s engagement strategies are proportionate to the scale of development proposed and there is not a one size fits all rule.

Overall, the key to successful engagement and consultation is to use a range of methods that are tailored to the specific needs of the stakeholders involved.

Example Projects		Examples of engagement
	House extension	Speak with your neighbours Write to your neighbours
	Single new house or small commercial development	Speak with your neighbours Write letters to your neighbours Contact local Amenity Society or community group
	Minor development (up to 9 new homes) And minor mixed-use development	Speak with your neighbours Write letters to your neighbours Contact local Amenity Society, community group, local ward members, and stakeholders
	Major residential development	Speak with your neighbours Leaflet neighbours and businesses Contact local ward members, amenity societies, community groups Website / social media/ digital Stakeholder workshops Community meetings and workshops

7 Equalities considerations

Early and effective consultation and engagement can help you find out about the different needs and experiences of local communities and stakeholders and how development proposals can minimise these impacts.

The Public Sector Equalities Duty does not apply to developers/applicants (except applications which are submitted by the Council to the Local Planning Authority). Nevertheless, to ensure that the Council meets our statutory duties, we expect you to undertake proportionate Equalities Impact Assessments of your development proposals. These assessments must set out how your development proposals will minimise or remove the issues and disadvantages that people and communities suffer due to their protected characteristics. Assessments should also highlight positive equalities impacts.

We want equalities to be a central consideration for pre-application engagement, and you should consider the following points:

- Equalities considerations are an important and legal matter, but you should note that equality impact assessments should be proportionate to the scale of development proposed and there is not a one size fits all rule.
- Engagement plans must ensure that engagement reflects the make-up of affected communities.

- Seldom heard groups should be specifically consulted.
- Local organisations with specialised knowledge should be engaged to ensure participation is representative.

We have provided template engagement strategies at Appendix 1.

What is the Fairer Lewisham Duty?

It is part of the Council's Corporate Equality Policy and ensures that we consider equality implications. The Duty is an assessment of equalities and the likely socio-economic impacts of proposals and decisions on residents and services.

The Lewisham Fairer Duty also:

- Provides assurance to the public that all relevant socio-economic factors are being considered in the decision-making process.
- Ensures that decision-makers have access to the widest range of relevant information needed to make the best possible decisions with regard to the impact of socio-economic inequality.
- Informs actions that may need to be taken to mitigate harm and damage to well-being of residents and service users experiencing the greatest socio-economic disadvantage.

8 What we expect at application stage

Certain applications as set out in our adopted [Local Requirements List](#) require the submission of a [Statement of Community Engagement](#).

Regardless of the size of a scheme, there is clear benefit to engaging with affected properties. This provides those affected with advance sight of development plans, can improve neighbour relationships and may result in a smoother planning application.

This could be as simple as providing a copy of your house extension plans to your neighbours for comment before you submit them to the Council, or sharing with them what you intend to construct using permitted development.

What is a Statement of Community Engagement?

A Statement of Community Engagement is a document which describes how an applicant has undertaken all forms of community engagement.

It is a formal document which accompanies a planning application.

When is a Statement of Community Engagement required?

The adopted [Local Requirements List](#) requires Statements of Community Engagement on the following schemes:

- Minor development of units 5-9
- Major developments (10+ units) – all applications

Where you have a scheme which does not fall in the above categories, but you have nevertheless undertaken community engagement, you are encouraged to produce a Statement of Community Engagement or include a section in your planning statement or covering letter.

What should a Statement of Community Engagement include?

- The types and timings of community engagement undertaken
- The extent of consultation
- The results and success of those methods
- Details of the views and feedback provided - negative, neutral and positive
- The changes made by the applicant in response
- If no scheme design changes, a full explanation why.

Statements of Community Engagement will be published online.

If a Statement of Community Engagement is required but not submitted your application will be invalidated.

Social Value Statement

What is a Social Value Statement?

A Social Value Statement can be used to demonstrate your understanding of how your development responds and contributes to the wider social, economic and environmental wellbeing of the area and our other policies that include social value.

When is a Social Value Statement required?

We do not currently have a requirement for a Social Value Statement. Nevertheless we highly recommend you consider producing one where your development also requires a Statement of Community Engagement. The Social Value Statement could be informed through any stakeholder/community consultation initiatives to support or discount requests.

What should a Social Value Statement include?

- A description of the needs and priorities, including how community consultation has informed your decision making.
- How the new development contributes to the delivery of relevant policies (for example those in our Development Plan requiring contributions towards local labour and training, or the objectives of our Social Value Policy) as well as the strategic objective of embedding Social Value.
- Clear commitments that cover design, construction and in-use phases.
- A clear proposal on how the delivery of social value will be managed and monitored, including an agreement on remedies to be taken in case of non-delivery or changes to respond to external factors.

Monitoring

We will monitor how developer engagement is being undertaken and its effectiveness via review of planning application documents, the content of the applicants Statement of Community Engagement and the content of representations received from the public.

We will update this guidance to reflect evolving best practice.

9 Post application engagement

What is post application engagement?

The submission and determination of a planning application is only part of the development process. Construction has the potential to impact surrounding properties, wider areas and their communities. Major regeneration schemes, that are delivered in phases, can have years of construction impact.

We regularly receive queries from the public about the status of a development site which we seek to answer by engaging with the developer, but construction is not a matter for the Planning Service to control or directly manage (except via enforcement of relevant planning conditions). This type of engagement is much more effective directly from the developer, which will build better relationship with local communities.

What are effective post application engagement techniques?

There are many forms of effective types of engagement. Developers should consider all forms of engagement and not solely rely on Online communication given that some communities may not have adequate digital access.

Example forms of construction consultation to update interested people on site development progress:

- Website and social media
- Leafleting/newsletters
- Public meetings/webinars 'meet the contractors'
- Information on site hoardings including notice boards
- Open days including opening the site to the public on occasion for example Open House London.

Appendix 1 – Template Engagement Strategy

This template Engagement Strategy is designed to provide a starting point for discussion with communities and stakeholders.

It is not designed to be a 'one size fits all' approach, and there will be circumstances when a more bespoke approach is required. In these instances, you are encouraged to speak with the Planning Service.

The purpose of this Engagement Strategy is to enable applicants to demonstrate their understanding of a site; where there may be knowledge gaps and how discussions with the public will be organised.

Site Analysis

Site and stakeholders

Who is currently using the site or has historically used the site?

No.	Question	Answer
1.	Who are the; - Occupiers - Owners - Users?	
2.	What are the demographics of those users? In particular those with protected characteristics	

Physical characteristics – heritage

No.	Question	Answer
3.	Give a description of the existing buildings and space surrounding the site	
4.	Is the site situated within a conservation area? If so, how have you considered this in your proposed scheme?	
5.	Is the building listed? If so, how have you considered this in your proposed scheme?	
6.	Is the building or site of any other historic or architectural interest? (Such as locally listed)	
7.	Is the site or any buildings on the site of wider community interest? (for example Assets of Community Value)	

Climate change

No.	Question	Answer
8.	Is the site in an area of Flood Risk?	
9.	What wider sustainability considerations are relevant for the site?	
10.	Is the building or site capable of retrofit or conversion?	
11.	What climate change mitigation and adaption measures are relevant for the site?	

Accessibility

No.	Question	Answer
12.	How is the site accessed by its current users?	
13.	What are the important routes (pedestrian, cycle, vehicular) through the site and why are they important?	

No.	Question	Answer
	Who currently uses these routes?	

Engagement Plan

Based on the Site Analysis outcome, outline how you will engage with the key stakeholders that been identified. You can add more rows to the table as appropriate.

Examples of engagement activities can include (but are not limited to):

- Stakeholder meetings
- Workshops
- Attending community group meetings
- Leaflets
- Letters
- Website and social media

Activity	Date	Attendees	Format	Justification
Name and type of engagement event, e.g. Workshops	When will the event take place? Give an estimate if you are unsure	Who will attend the event? Which groups are you looking to reach?	How will participants feedback in the session?	Why did you choose this format? Why did you choose to target this group in particular? Use the evidence base from the facts-based audit to support your answer.

How will you incorporate feedback into the schemes design? If not why not?

Archio

Citizens House, Lewisham Pre-application engagement and outcomes



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Citizens House, Lewisham

Client: London Community Land Trust with Lewisham Citizens
Size: 11 homes, 667sq.m (mix of 1 and 2 bed homes)
Cost: £2.5m
Status: Completed, January 2023
Procurement: Design + Build
Archio Role: Lead Designer / Architect, Stages 0-7

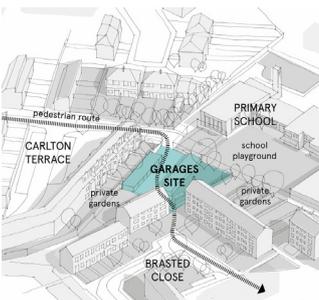


Above: We began the design process by holding co-design workshops on the garage sites. The process was awarded "Best Community Engagement Outcomes" at the London Planning Awards.



British Homes Awards 2023: Best Affordable Housing Judges Prize for Excellence

Below: Site diagram showing the existing garage site



The first community land trust homes in London directly created by the community. 11 genuinely affordable homes for local residents built on a small, backland garage site.

London CLT's ambition is to build trust and community buy-in for new homes through the way residents are engaged, going as far as delegating key decisions to them.

Engagement and Co-design highlights included:

- "Pick an Architect" workshop culminating in a vote by residents for Archio
- Formation of a resident steering group meeting monthly with design team
- An initial three-day co-design workshop using a temporary office in one of the site's empty garages
- Further on-site design workshops with the community using questionnaires, written and filmed testimonials

Engagement outcomes:

- The planning application received 107 letters of support from neighbours and the local community
- The scheme has delivered physical benefits for neighbours, including a popular "piazza" space, and safer pedestrian walking route
- Neighbours have got to know each other through the process

This project, 11 affordable homes for the London Community Land Trust (CLT), was instigated by Lewisham Citizens, and made possible by the gift of land from Lewisham Council, who also saw the potential in an underused garage site.

The final housing design is the result of a unique competition at which residents and members of the community selected Archio at a public workshop. Working with a resident steering group the building was positioned to open-up an existing pedestrian route into a new shared public space. This space was co-designed with local residents to provide a space for all residents to sit, gather and practice riding a bike!

It is the first purpose-built CLT project in London and is 100% affordable, with each home sold to a resident of the Borough at a price linked to local wages.



"It is genuinely life-changing... My only frustration is that there aren't more places like this."

Resident at Citizens House, Lewisham

Right: View of the public space in front of the 11 homes

Below right: early workshop on site with local community



"Archio have listened to resident's concerns every step of the way. It is an amazing opportunity to be part of the steering committee of such a pioneering project. The final design is very impressive, it feels spacious, without being over-bearing..."

**Katy Milner,
Neighbour at Brasted Close, Lewisham**

