

Development & Regeneration Consultation Policy

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Contents

| | |
|---|---|
| 1. Background | 2 |
| 2. Decision Making | 2 |
| 3. Key Principles | 3 |
| Effective Consultation | 3 |
| Honesty and Openness | 3 |
| Quality Consultation Materials | 4 |
| Quality Developments | 4 |
| 4. Tender Process | 4 |
| Development Consultation Procedure | 5 |
| 1. Initial Communication with the area/estate board | 5 |
| 2. Presentation of Development, Consultation and Communication Plans to the Estate Board | 5 |
| 3. Area/Estate board Involvement in the creation of Consultation Plan | 5 |
| 4. Feedback from Consultation events to the estate board | 6 |
| 5. Area/Estate Board/ Resident Generation Group involvement in creating Communications plan | 7 |
| 6. The decision to seek planning consent and beyond | 7 |
| Regeneration Projects and planned major Works Consultation Procedure | 9 |
| 1. Initial Communication with the AREA/Estate Board /RESIDENT REGENERATION GROUP | 9 |
| 2. Presentation of regeneration & Planned Major works Consultation and Communication Plans to the area / Estate board/ Resident Regeneration Group | 9 |
| 3. Area / Estate Board / Resident Regeneration Group Involvement in the creation of the consultation plan | |

| | |
|--|----|
| 4. Presentation of regeneration & Planned Major works Consultation and Communication Plans to the area / Estate board/ Resident Regeneration Group | 10 |
| 5. Area/Estate Board/Resident Regeneration Group Involvement in creating Communications plan..... | 11 |
| 6. The decision to seek planning consent and beyond..... | 11 |
| 7. Resident Choices | 12 |
| 8. Record Keeping..... | 12 |
| 9. Resolving Disagreements..... | 12 |
| IMPACT ASSESSMENT | 13 |
| APPENDIX A: Consultation Methods | 14 |
| APPENDIX B: Methods of Advertising Public Consultation Events | 15 |

1. Background

1.1 Poplar HARCA is a housing and regeneration community Housing Association. Poplar HARCA is a registered charity solely concerned with regenerating both the built environment in Poplar and the lives of the residents who live there. Poplar HARCA is a Not for Profit organisation and all income is spent on the homes and life chances of Poplar’s residents.

1.2 Poplar is located in The London Borough of Tower Hamlets in the east end of London. At the time of writing in 2020, there are around 18,000 people registered on The London Borough of Tower Hamlets housing waiting list. A large number of these are overcrowded. Living in overcrowded circumstances has many negative effects on people’s lives, especially children.

1.3 Poplar HARCA is committed to developing new homes where possible to help resolve this problem, and to providing brighter opportunities for residents and their children. Space will always be scarce in the heart of the east end of London so some new developments will need to be close to existing homes or involve re-housing residents. When Poplar HARCA can find a way to make new homes for the many residents in housing need, it will try to build them. Poplar HARCA recognises change is often difficult and will work closely with affected residents to support them through the process.

1.4 Poplar HARCA introduced a Development Compact in 2007 which was adopted by most of its area/estate Boards. There was a commitment made within that document to review and revise it as necessary. This policy and associated procedure are proposed as a new approach to the issues first tackled in the Development Compact and is a reflection of lessons learned from the shared experiences of development consultation since that time.

1.5 Poplar HARCA also undertakes a multi – million pound regeneration scheme programme and a planned major works programme, both of which impinge on residents’ lives and therefore require meaningful consultation and dialogue.

Please refer to the new Consultation Policy 2020 which supersedes all policies where consultation is mentioned except where a statutory consultation is mentioned.

2. Decision Making

2.1 The ultimate decision makers in terms of planning for both new developments and regeneration schemes, will be the planning authority – normally Tower Hamlets Council and in exceptional

circumstances, the Greater London Authority. The Council and any other planning authority will have their own statutory consultation process and their decision making process either through delegated authority to officers or the relevant planning committee.

- 2.2 Within Poplar HARCA, the responsibility to decide whether or not to proceed with a development lies with the Poplar HARCA Audit & Risk and Finance and General Purposes committee before being ratified by the main board in terms of its design, the number and type of homes it provides and how it meets Poplar HARCA's strategic objectives.
- 2.3 Poplar HARCA's area and estate boards are the primary and first consultative bodies for potential developments, regeneration schemes and planned major works; how this consultation will be done in practice is detailed later in this policy. The aspiration is that all developments and regeneration schemes put forward to planning do so with area/estate boards agreement however, for the avoidance of confusion; it is felt best to state clearly that area/estate boards will not have the right of veto. In the absence of an estate board Poplar HARCA will use its best endeavours to create a resident group from the area affected by a proposed regeneration scheme.
- 2.4 Should the proposed regeneration scheme or development proposal fall within the remit of greater London Authority's regeneration ballot, Poplar HARCA will adopt the GLA's proposed ballots and will adhere to the GLA's policy and procedure that direct these ballots.

3. Key Principles

Effective Consultation

- 3.1 Poplar HARCA is resident driven and is committed to engaging with all sections of the community and other stakeholders.
- 3.2 Poplar HARCA will listen to all views and take into account the views expressed by all stakeholders in order to understand individual perspectives when creating development proposals.
- 3.3 Poplar HARCA will always give feedback on stakeholders' views and explain why a specific course of action has been chosen.
- 3.4 Should outside events preclude physical consultation events Poplar HARCA and its agents/consultants will use remote/virtual tools to ensure consultation progresses

Honesty and Openness

- 3.5 Poplar HARCA will always be honest and open with residents, including when things change as a result of factors either within or outside their control.
- 3.6 Poplar HARCA will communicate clearly to the Area, Estate Board or resident regeneration group within whose area the proposal falls at the feasibility stage any development plans for an area to enable the Board to give due thought and consideration to their role in representing residents' interests.
- 3.7 Poplar HARCA will communicate clearly to the Area, Estate Board or resident regeneration group the known constraints it is working within with each development. These may include planning,

financial, construction, social, architectural design, environmental impact and infrastructure.

- 3.8 Poplar HARCA will also communicate clearly to the area/estate board issues that arise from other statutory bodies, such as the Greater London Authority or the Health and Safety Executive, which may dictate how a scheme progresses.

Quality Consultation Materials

- 3.9 The Director of Development is responsible for ensuring that good quality plans, models, presentations and illustrations as appropriate are made available in time for public consultation and are sufficient to help enable those viewing them to understand the proposals they represent. Detailed images will be available once a scheme reaches a more advanced stage of refinement.

Quality Developments

- 3.10 The Director of Development is responsible for ensuring that proposals brought forward meet as far as possible the standards set out in the Poplar HARCA Design Guide, which was developed in partnership with resident representatives. Any exceptions to the design guide will be explicitly pointed out and explained.

4. Tender Process

- 4.1 The ultimate decision makers in terms of planning for both new developments and regeneration schemes, will be the planning authority – normally Tower Hamlets Council and in exceptional circumstances, the Greater London Authority. The Council and any other planning authority will have their own statutory consultation process and their decision making process either through delegated authority to officers or the relevant planning committee.

Development Consultation Procedure

1. Initial Communication with the area/estate board

1.1 At the feasibility stage of a potential development scheme the Development Team member (for example, the Project or Framework Manager), will advise the Area/Estate Board or resident regeneration group either at a meeting or in writing of the following:

- The location of the development site being considered.
- The predicted outcomes at the time of reporting in terms of new homes, the number for social rent, intermediate rent, shared ownership and private sale (although it will be understood that this could well change)
- Any other expected improvements (for example environmental).
- The expected extent of any demolition.
- The planning and other authorities that will decide the future of the scheme.
- The perceived benefits of the development.
- The perceived drawbacks of the development.
- The expected date when preliminary drawings and consultation plan will be ready for presentation and discussion with the Estate Board.
- The anticipated date when planning permission will be sought.

2. Presentation of Development, Consultation and Communication Plans to the Estate Board

2.1 Once the preliminary drawings and sketches of the development are prepared, the Development Team lead for the scheme will arrange for these to be presented to the Area/Estate Board or resident regeneration group together with the proposed consultation and communication plan.

2.2 Area/Estate Board or resident regeneration group members will consider the implications of the development plan for the residents they represent in particular those most directly affected, and will consider the overall implications of the development for the area.

2.3 The Area/Estate Board or resident regeneration group will be asked to comment and make recommendations as to the suitability of the development plans for public consultation. The resident groups will be asked to comment whether the plans are ready for public consultation.

2.4 Should outside events prevent physical consultation Poplar HARCA and its agents/consultants will use virtual and other consultation tools to ensure consultation continues

3. Area/Estate board Involvement in the creation of Consultation Plan

3.1 At the same time as presenting the development plans to the Area/Estate Board or resident regeneration group, Poplar HARCA will also present their proposed consultation plan and invite the Board to make comments and recommendations.

3.2 The consultation plan will be in accordance with Poplar HARCA's Diversity and Equalities policies and include.

- The expected period of consultation before a planning application will be made

- A range of methods to gain residents opinions that maximises participation (see Appendix A)
 - The methods of advertising for consultation events
 - The period of notice residents will be given of any public events
- 3.3 The Area/Estate Board or resident regeneration group will consider and make recommendations as to which methods of consultation are the most suitable for the development under consideration, and where, how and when any public consultation events should be advertised.
- 3.4 Poplar HARCA should identify with the Area/Estate Board or resident regeneration group, other stakeholders (e.g. schools, local businesses, GPs, shops, community groups) who may be affected by the development to help determine the most appropriate methods for their consultation.
- 3.5 In the course of agreeing the consultation plan, the Development Team should agree with the Area/Estate Board or resident regeneration group when feedback from the consultation process should be shared with the resident groups.
- 3.6 Area/Estate Board or resident regeneration group members are encouraged to attend public consultation events to obtain further information about the proposed development, to consider aspects of the development of relevance to residents, to assess the views of the residents they represent and to review the quality and success of the event.

4. Feedback from Consultation events to the estate board

- 4.1 During the consultation stage the Area/Estate Board or resident regeneration group will be the primary residents group involved in communications related to the development from Poplar HARCA and its consultants.
- 4.2 Poplar HARCA officers and consultants will report feedback from all consultation events to the Area/Estate Board or resident regeneration group in writing. This will include the number of residents attending public events, comments received, and issues raised by residents in letters, emails and responses to newsletters.
- 4.3 The Development team lead officer will also provide written feedback on consultation exercises undertaken with the responses from Development officers to the comments made.
- 4.4 During the consultation process, Poplar HARCA's planning consultants through the Development team lead officer will inform the Area/Estate Board or resident regeneration group on any letters, petitions etc. received. This feedback will include Poplar HARCA's response to each point raised, including an explanation of any changes that may have been made to the scheme in response to comments as well as when requested changes to the development plan are not possible.
- 4.5 The Development Team lead officer will discuss with the relevant housing manager and the area/estate/resident regeneration group Chair where and when feedback can be provided to ensure this is on the appropriate meetings agenda.
- 4.6 The Director of Development will be responsible for ensuring attendance by Development officers, the architect or other consultants as appropriate and ensure update reports, consultation materials and other necessary support is provided in a timely fashion.

5. Area/Estate Board/ Resident Generation Group involvement in creating Communications plan

- 5.1 At the beginning of each development proposal the project manager will agree a communications structure with the area/estate board.
- 5.2 This will include an escalation process and will ensure that all queries raised are captured and dealt with appropriately.
- 5.3 The communications plan will include a commitment to answer all requests for information other than information which is deemed economically sensitive.
- 5.4 The communication plan will include a structure for letters, block letters, newsletters, electronic communications, meetings and drop-ins. The structure will allow nominated members of the area/estate board to comment on these communications before they are issued.
- 5.5 The communication plan will, in most circumstances, nominate the project manager as the first port of call for residents and a commitment to reporting any feedback and decision made following feedback to the area/estate board/resident regeneration group.

6. The decision to seek planning consent and beyond

- 6.1 The Area/Estate Board/resident regeneration group will be informed when the Director of Development decides to apply for permission from the London Borough of Tower Hamlets or other planning authority, to demolish and or build.
- 6.2 The Development lead for the project will advise the area/estate/resident regeneration group board of the decision making process, this will include:
 - The planning authority that will grant or refuse permission
 - The statutory planning consultation process time frame
 - If the schemes planning consent is expected to be delegated to officers or the name of the committee it will be decided at
 - If there is any grant contributing to the scheme, who this comes from and when this decision is likely to be made
 - When the proposal are expected to be presented to Poplar HARCA's Finance and General Purposes Committee and/or full board of Poplar HARCA
- 6.3 If planning permission is sought, there will be a further statutory period of public consultation carried out by the Planning Department of the London Borough of Tower Hamlets.
- 6.4 If planning consent is granted, Poplar HARCA will inform the Area/Estate Board/resident regeneration group. A further agreement will be sought between Poplar HARCA and the Area/Estate Board/resident regeneration group on the timings and way in which the Area/Estate Board/resident regeneration group will be kept updated on progress throughout construction, and the methods by which emerging issues or problems arising from the development can be discussed or resolved. This information will also include any planning authority requirements such as traffic plans and other conditions.
- 6.5 Reports to Poplar HARCA boards will include the results of the consultation process.

6.6 The Development lead will be responsible for updating the area/estate board of the progress of the entire project and also responsible for responding to the area/estate board's comments and the results of any other consultation carried out.

Regeneration Projects and planned major Works Consultation Procedure

1. Initial Communication with the AREA/Estate Board /RESIDENT REGENERATION GROUP

1.1 At the planning stage of a regeneration project or planned major works scheme the Development Team member (for example, the Project or Framework Manager), will advise the Area/Estate Board/resident regeneration group either at a meeting or in writing of the following:

- The location of the regeneration scheme or planned major works project.
- The predicted outcomes at the time of reporting in terms of achieving decent homes standard and above or achieving the planned major works
- Any other expected improvements such as environmental and insulation improvements.
- The expected extent of any demolition.
- The planning and other authorities that will decide the future of the scheme.
- The perceived benefits of the regeneration scheme or planned major works.
- The perceived drawbacks of the regeneration scheme/planned major works.
- The expected date when preliminary drawings and consultation plan will be ready for presentation and discussion with the resident groups.
- The anticipated date when planning permission (if required) will be sought.

2. Presentation of regeneration & Planned Major works Consultation and Communication Plans to the area / Estate board/ Resident Regeneration Group

2.1 Once the preliminary drawings and sketches of the regeneration scheme or planned major works are prepared, the Development Team lead for the scheme will arrange for these to be presented to the Area/Estate Board/resident regeneration group together with the proposed consultation and communication plan.

2.2 Area/Estate Board/resident regeneration group members will consider the implications of the regeneration project or planned major works for the residents they represent in particular those most directly affected, and will consider the overall implications of the scheme(s) for the area.

2.3 The Area/Estate Board/resident regeneration group will be asked to comment and make recommendations concerning the projects including any local knowledge pertinent to the schemes.

3. Area / Estate Board / Resident Regeneration Group Involvement in the creation of the consultation plan

3.1 At the same time as presenting the regeneration scheme or cyclical maintenance project to the Area/Estate Board/resident regeneration group, Poplar HARCA will also present their proposed consultation plan and invite the Board to make comments and recommendations.

3.2 The consultation plan will be in accordance with Poplar HARCA's Diversity and Equalities policies and include.

- The expected period of consultation before a planning application will be made

- A range of methods to gain residents opinions that maximises participation (see Appendix A)
- The methods of advertising for consultation events
- The period of notice residents will be given of any public events

3.3 The Area/Estate Board/resident regeneration group will consider and make recommendations as to which methods of consultation are the most suitable for the regeneration scheme or planned major works under consideration, and where, how and when any public consultation events should be advertised.

3.4 Poplar HARCA should identify with the Area/Estate board/resident regeneration group, other stakeholders (e.g. schools, local businesses, GPs, shops, community groups) who may be affected by the proposed works to help determine the most appropriate methods for their consultation.

3.5 In the course of agreeing the consultation plan, the Development Team should agree with the Area/Estate Board/resident regeneration group when feedback from the consultation process should be shared with the Area/Estate Board/resident regeneration group.

3.6 Area/Estate Board/resident regeneration group members are encouraged to attend public consultation events to obtain further information about the proposed development, to consider aspects of the proposed works of relevance to residents, to assess the views of the residents they represent and to review the quality and success of the event.

3.7 Should outside events preclude physical consultation Poplar HARCA and its agents/consultants will use virtual tools to ensure that consultation continues

4. Presentation of regeneration & Planned Major works Consultation and Communication Plans to the area / Estate board/ Resident Regeneration Group

4.1 During the consultation stage the Area/Estate Board/resident regeneration group will be the primary residents group involved in communications related to the proposed works from Poplar HARCA and its consultants.

4.2 Poplar HARCA officers and consultants will report feedback from all consultation events to the Area/Estate Board/resident regeneration group in writing. This will include the number of residents attending public events, comments received, and issues raised by residents in letters, emails and responses to newsletters.

4.3 The Development team lead officer will also provide written feedback on consultation exercises undertaken with the responses from Development officers to the comments made.

4.4 During the consultation process, the client team lead officer will inform the Area/Estate Board/resident regeneration group on any letters, petitions etc. received. This feedback will include Poplar HARCA's response to each point raised, including an explanation of any changes that may have been made to the scheme in response to comments as well as when requested changes to the development plan are not possible.

4.5 The Development Team lead officer will discuss with the relevant housing manager and the area/estate board/resident regeneration group Chair where and when feedback can be provided to ensure this is on the appropriate meetings agenda.

4.6 The Director of Development will be responsible for ensuring attendance by Development officers, the architect or other consultants as appropriate and ensure update reports, consultation materials and other necessary support is provided in a timely fashion.

5. Area/Estate Board/Resident Regeneration Group Involvement in creating Communications plan

- 5.1 At the beginning of each regeneration scheme or planned major works the project manager will agree a communications structure with the area/estate board/resident regeneration group.
- 5.2 This will include an escalation process and will ensure that all queries raised are captured and dealt with appropriately.
- 5.3 The communications plan will include a commitment to answer all requests for information other than information which is deemed economically sensitive.
- 5.4 The communication plan will include a structure for letters, block letters, newsletters, electronic communications, and meetings and drop ins. The structure will allow nominated members of the area/estate board/resident regeneration group to comment on these communications before they are issued.
- 5.5 The communication plan will, in most circumstances, nominate the project manager as the first port of call for residents and a commitment to reporting any feedback and decision made following feedback to the area/estate board.

6. The decision to seek planning consent and beyond

- 6.1 The Area/Estate Board/resident regeneration group will be informed when planning consent is required and when this will be applied for.
- 6.2 The Client lead for the project will advise the area/estate board/resident regeneration group of the decision making process, this will include:
 - The planning authority that will grant or refuse permission
 - The statutory planning consultation process time frame
 - If the schemes planning consent is expected to be delegated to officers or the name of the committee it will be decided at
 - If there is any grant contributing to the scheme, who this comes from and when this decision is likely to be made
 - If planning permission is sought, there will be a further statutory period of public consultation carried out by the Planning Department of the London Borough of Tower Hamlets.
- 6.3 If planning consent is granted, Poplar HARCA will inform the Area/Estate Board/resident regeneration group. A further agreement will be sought between Poplar HARCA and the Area/Estate Board/resident regeneration group on the timings and way in which the Area/Estate Board will be kept updated on progress throughout construction, and the methods by which emerging issues or problems arising from the development can be discussed or resolved. This information will also include any planning authority requirements such as traffic plans and other conditions.
- 6.4 Reports to Poplar HARCA boards will include the results of the consultation process.
- 6.5 The Development lead will be responsible for updating the area/estate board/resident regeneration group of the progress of the entire project and also responsible for responding to the area/estate board/resident regeneration group's comments and the results of any other consultation carried out

7. Resident Choices

- 7.1 The project manager will present a menu of choices available to residents as part of the proposed regeneration scheme or planned major works, these choices will be drawn from a pre-agreed list bespoke for each project.
- 7.2 The choices menu could also include a selection of extras/additions to the package proposed by Poplar HARCA that could be chosen by residents who would then be responsible for the extra cost entailed.
- 7.3 The project manager will facilitate these choices by sending out pre-design information sheet which will explain the process, choices available to them and the timescale for each element of the regeneration works for their home and/or block.

8. Record Keeping

- 8.1 The Development lead will be responsible for accurate record keeping throughout the consultation process. This will form a key element of the consultation plan and will include dates of all area/estate board/resident regeneration group meetings and any sub-groups of these where the development is discussed together with notes of comments and action points arising from the meetings.
- 8.2 The record will also note what changes are made as a result of these meetings and explanations when changes are not made.
- 8.3 The record will also include all public consultation events, together with advertising media used, numbers attending and comments made.
- 8.4 The record will also include copies of all publicity materials issued during the consultation.
- 8.5 This record will be made available on request.

9. Resolving Disagreements

- 9.1 Development is often a matter which arouses controversy, and it is recognised that disagreements will happen. In all cases, efforts should be made to resolve these locally, escalating to the Director of Development for intervention and arbitration where necessary. If this does not resolve the issue, it may be referred onwards to the Joint Estate Panel. In such cases the JEP representative of the area/estate Board/resident regeneration group concerned will be required to explain the reasons for the Boards decision. It should be noted that such escalations are likely to be exceptions, for example, where the proposed scheme is of a size, significance or significant problem to residents, to impact upon the strategic direction of the organisation.
- 9.2 The final decision whether to proceed or not lies with Poplar HARCA's board. A planning consent may be sought while a project is being referred to the Joint Estate Panel or main Board.

IMPACT ASSESSMENT

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| <p>How does the policy procedure / procedure/strategy contribute to Poplar HARCA's aims?</p> | <p>This policy regularises the consultation process for regeneration/major works schemes.</p> |
| <p>Which group(s) of people benefit from the policy/ procedure/ strategy? If any group could be disadvantaged, what is the mitigation or justification?</p> | <p>Everyone benefits from good consultation. Exemptions and concessions are included.</p> |
| <p>How have residents been involved in developing the policy / procedure / strategy? If they have not been involved, why not?</p> | <p>Over time, Estate Boards and JEP have fed into the policy. Feedback from complaints and contacts is incorporated.</p> |
| <p>How will the policy / procedure / strategy be monitored and measured (e.g. Are there KPIs?)</p> | <p>The resident satisfaction survey measures how residents feel about the estate they live on.</p> |
| <p>If any, what are the Value for Money (VfM) implications?</p> | <p>Good consultation avoids many misunderstandings and complaints</p> |
| <p>Will personal data be collected, stored, used or shared? If Yes, a privacy assessment must be carried out</p> | <p>No additional data will be collected as a result of this policy. Data will be stored/secured on existing databases.</p> |

APPENDIX A: Consultation Methods

1. Hand delivered letters to directly affected residents advising them of the development and how they can share their views.
2. Home visits by fully briefed and experienced Poplar HARCA staff to all households who will or may need to be decanted.
3. Consultation events at local community centres at varying times of day including weekends and evening with architects present.
4. High quality drawings, plans and models of proposed developments available at consultation events.
5. High quality drawings lodged with a named officer in the nearest community centre together with a contact name and address for comments.
6. Local 'drop ins' with (or without) architects present.
7. Door knocking exercise led by fully briefed and experienced Poplar HARCA staff to get residents feedback.
8. Dedicated drop in sessions for specific groups. For example leaseholders affected financially by proposals due to decant.
9. Questionnaires with postage paid return envelopes.
10. Visits to the proposed development site for affected residents led by fully briefed and experienced Poplar HARCA staff.
11. The use of zoom or other remote communication tools when meetings and other physical means of communication are impossible or outlawed

APPENDIX B: Methods of Advertising Public Consultation Events

1. Newsletters
2. Fixing of notices in commonly visited areas such as stairwells
3. Through local community groups
4. In local news papers
5. Website
6. Facebook and/or other social media tools