

Words (in)action: the orchestration of participation in planning through Statements of Community Involvement in England

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**Words (in)action: the orchestration of participation in planning through
Statements of Community Involvement in England**

Town Planning Review

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Abstract:

Drawing on empirical cases this paper examines the political work enacted through the seemingly mundane procedures and texts that shape planning practice and community participation yet which reflect the exercise of different forms of power. Through application of Foucauldian power theory the paper shows how the design and the specificities of inscription of Statements of Community Involvement (SCIs) reflect institutional resistance to mandated participation, such that the promise of participation inputs are held contingent. This assessment highlights how local authorities rarely commit to participatory activity beyond the statutorily defined requirements and how such texts structure community relations on this basis.

Keywords:

Power, planning, text, ideology, community, participation, governance, contingency.

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Introduction

Planning systems are key sites for the production of texts which aim to govern behaviour over land use and its development. It is clear that as a form of regulation, planning is expected to exert influence and direct actors involved in the production of the built environment. It is well recognised in the literature that planning texts are not and cannot be neutral; rather, they are imbued with and construct power relations between actors (Richardson, 1996; Turner, 2001; Wagenaar, 2014). Such power over agency in planning practice is manifest not only in written policy, but also in decisions, recommendations and guidance that structure relations between participants.

Given the power implicated in the (re)production of behaviours and actions through words, such texts become open for insightful analysis; examining how they are prepared, who is involved, what they say and what they omit to say. Taking this perspective, we signal how power is directed through a particular type of planning text; that is text which aims explicitly to manage or 'condition' the participation of the public in local planning activity.

Whilst improving public participation has been a claimed priority of UK governments for at least the past four decades, there has been limited critique of one of the main statutory tools introduced to guarantee the basis of participation locally – Statements of Community Involvement (SCIs) which set out how local planning authorities (LPA) will engage with the community they serve (discussed in the next section). We apply a Foucauldian analysis of power to this under-researched but ubiquitous planning document to highlight the profound implication of words in and on action in practice, and not only in plans, but in the framing of plan process through apparently mundane bureaucratic tools (Rose et al., 2006; Thrift, 2000).

Drawing on a Foucauldian lens highlights that the orchestration of SCIs and the implications of their precise specification is significant, given that *"in every society the production of discourse is at once controlled, selected, organised and redistributed by a certain number of procedures whose role is to ward off its powers and dangers, to gain mastery over its chance events, to evade its ponderous formidable materiality"* (Foucault cited in Young, 1981: p.52).

Clearly texts are not the entirety of planning discourse, but the production, organisation, selection and control of text is revealing (cf. Pløger, 2008; Sharp and Richardson, 2001; Turner, 2001; Richardson, 1996; Tett and Wolfe, 1991). Texts may be viewed as moral objects that, according to Barthes, seek to reify aspects of the social contract where text is '*produced in the space between the reader and the written*' (1980: p.31-32). Through textual analysis and power theory we may discern how the content of SCIs reflect attempts to restrict or manipulate actions and to 'ritualise' conduct(s) that '*defines the gestures, behaviour, circumstances, and the whole set of signs which must accompany discourse*' (Foucault, 1970: p.62).

The power of words to shape (in)actions has long been recognised. Orwell in his essay *Politics and the English Language* (1946, p.139) refers to political language which '*has to consist largely of euphemisms, question-begging and sheer cloudy vagueness*'. Similarly, Lutz (1989), in discussing the implications of modern usage of Orwellian 'doublespeak', recognised that '*like any other tool, language can be abused, used not to build but to destroy, not to communicate but to confuse, not to clarify but to obscure, not to lead but mislead*' (p.1). Using the case of SCIs here we postulate that the politicisation of planning extends to text that serves to condition (the expectation of) planning activity through vagueness and obfuscation.

Turner (2001, p.298) highlights that few accounts of the local state involve a close empirical focus on the textual practices that put local governing, policies and politics together; arguing that such narratives '*thus fail to make visible the actual work, processes and activities of people engaged in governing processes and their local politics*'. This paper directs attention to the political work of texts - but does not seek to provide an empirical account of SCIs in practice or offer potential policy fixes. Rather we seek to highlight how the detail and wording of such texts has allowed LPAs to avoid commitment to specific participatory undertakings beyond minimums set out in regulation.

Despite some initial interest (Baker et al., 2007) no detailed review of the design and operation of SCIs has been conducted to date, although see Parker et al., (2021a) for an overview and Wilson and Tewdwr-Jones (2022). The first contribution of this paper therefore is to address this gap in knowledge given SCIs were to presage a more active and collaborative era for shaping plan-making and development proposals in England (see Brownill and Carpenter, 2007). The empirical evidence presented here shows SCIs as a policy tool which reifies the claims and expectations rehearsed around the time of its production. SCIs have served to structure and maintain pre-existing relations, and the participation offered by LPAs is made

contingent and moreover offered on their terms. We therefore find that SCIs clearly do not achieve their intended potential.

The second contribution made here is to highlight SCIs as a form of planning document which manages a key set of *inputs* or processes that shape planning, rather than text which is obviously to organise implementation, such as plans which direct planning *output*. We argue that the former represents an example of an orchestration of process which shapes the stage(s) of social design and where other actors could potentially co-produce planning. Significantly this activity is critical precisely because of the influence on input performed prior to action later in planning processes (i.e., the production of the Local Plan). Moreover, while LPAs control the text for their participation efforts, the actor(s) with the most power to exploit that operating context to their own advantage are simultaneously preferred.

In assessing the approach taken by LPAs towards SCIs, we seek to uncover what this tells us about how power is deployed by local government to orchestrate participation and conversely how such documents shape community expectations. Furthermore, whilst the focus of this paper is on a tool specific to the English Planning system, the deeper theoretical and practical issues it addresses around power relations and public participation will be of relevance more widely and should be a concern internationally; particularly where community inputs are subject to manipulation.

SCIs as a (failing) policy instrument

This consideration of the political work and power relations performed through SCIs is timely given renewed attention on community participation in the context of localism and enhanced participation voiced by the UK government over the past decade (cf. MHCLG, 2020 – now DLUHC). SCIs were first introduced through the Planning and Compulsory Purchase Act 2004 under a Labour Party administration. The suite of reforms at that time included an emphasis on community engagement as '*essential to achieve local ownership and legitimacy for the policies that will shape the future distribution of land uses and development in an authority's area*' (ODPM, 2005: p.8). The RTPi (2004) also viewed SCIs as part of a solution to enhanced community involvement in planning, arguing that:

...the requirement for LPAs to produce Statements of Community Involvement (SCIs)—included in the 2004 Act—is a step in the right direction. SCIs are to set out the LPA's policies for involving the community in the preparation and revision of local

development documents and the determination of planning applications (RTPI, 2004: para. 13).

An active role for SCI was anticipated at this time, where both *'the community and stakeholders are expected to be involved in drafting the SCI. Such involvement at the draft stage allows them to influence the scope and form of community participation'* (Baker et al., 2007: p.81). The SCI was intended to express how an LPA will engage with the public in all the elements of local planning in England (i.e., the development of the local plan, neighbourhood plans and in individual development management cases) and form part of the statutory array of documents constituting the local development plan.

SCIs also represent the clearest equivalent to community involvement 'mandating' as found in the US (see Bunnell and Jepson, 2011). However, such arrangements created to guarantee involvement are not without their problems, including; resourcing, clarity over purpose, timing and techniques as well as issues with the capacity of citizens to engage impact on mandated participation (Brody et al., 2003).

SCIs were bolstered by the 'duty to involve' introduced in 2008 which required local authorities to *'...take those steps they consider appropriate to involve representatives of local persons in the exercise of any of their functions'* (DCLG, 2008; p20); however this duty was repealed in 2011, and the Planning Inspectorate (PINS) was no longer required to examine draft SCIs to see if the duty to involve had been addressed adequately. Instead, a revised approach was pursued, and local government were to *'encourage authorities and civil society to collaborate more, including greater involvement for voluntary groups'* (DCLG, 2011: para. 1).

The requirements for SCIs were modified again through the Town and Country Planning Regulations (2017) and Neighbourhood Planning Act (2017) and: *'Local planning authorities must review their Statements of Community Involvement every 5 years from the adoption date. It is important that Statements of Community Involvement are kept up-to-date to ensure effective community involvement at all stages of the planning process.'* (NPPG, Para: 071 Ref ID: 61-071-20190315).

In terms of local plan making, it is notable that national policy states: *'Plans should... be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees'* (NPPF, 2019: para. 16). The legislation is not explicit about *how* LPAs

should involve communities in Local Plan-making, beyond iterating the minimum legal requirements to consult at key stages, and thus leaves the approach open to discretion.

Baker et al. (2007) asserted optimistically, just after SCIs were introduced, that: '*the evidence suggests that requirements of the new [post-2004] planning system are beginning to destabilize the everyday practices of planning professionals and, slowly but surely, develop a change trajectory towards more creative and effective participation strategies*' (p.91). Yet since any early progressive activity identified, atavism appears to have beset SCIs, with the initial requirements and checks and balances introduced in 2004 being effectively dismantled and LPAs distancing themselves from action beyond statutory obligations.

Texts, power and participation in planning

Whilst much attention has been paid to planning *outputs* informed by community participation in planning, there has been little consideration of the framework shaping system *inputs* prior to engagement activity. This paper therefore reflects on the position guaranteed for local communities by LPAs before inputs take place and which set-ups an important relationship between them. To do this we underscore the role that such SCI texts can play in shaping power relations and how they are reflective of *a priori* exercises of power (i.e. the power of the text and the context).

MacCallum and Hopkins (2011) identify four key textual features of plans: firstly, the construal of substance, construction of agency, generic structure, and presentation. Together they enable the investigator to go beyond thematic discourses and uncover the institutional, political and ideological role of planning during the time period in which plans are produced. While we are not examining a Plan *per se*, we are digging into the structuring context that acts to pre-figure Plans and planning decisions in a discretionary system of planning. Thus our specific concern is the way in which wording constructs agency and serves to perform community participation as planning input. This chimes well with the work of Freeman (2019) who highlights that attention to the micro-level of meetings and texts brings a new focus to bear on policymaking given that '*the document is the principal artefact of politics because actions about action must be reified into representations - accounts and interpretations of the world - in order to become the object of future actions*' (2019, p.380); while also noting the configurations or assemblages that together form the environment in which actors engage (cf. Eizenberg, 2019).

The relations between an LPA and their community are mediated, in part, through administrative documents that are arranged in support of institutionalised planning activity. Such administrative tools remain less explored in the planning literature and we home in on these seemingly mundane or otherwise micro decisions that planners have used to circumvent undertakings, or effectively excuse, a lack of commitment to citizen engagement. This work adds a layer of consideration that goes further into the tactics used to shape planner-citizen interaction and apparent in recent work attempting to understand policy processes (Wagenaar, 2014) and citizen participation (Connelly et al., 2020).

Foucault urged the study of power in specific contexts such as planning; where knowledge production is effected through an ensemble of strategies, technologies and techniques, and his work has informed a number of planning theorists (see, for example, Huxley, 2000; Fischler, 1995). The Foucauldian perspective views power as ever-present with a fluid or encompassing definition of 'action on others' (Burchell et al., 1991: p.5). This view draws attention not only to the dynamics of power within decision-making process, but also control of the political agenda and how demands may be prevented from being made by others.

As such an often mundane or 'everyday' use of power is to prevent (observable) conflict from arising in the first place. Lukes (1974) argued that power was at work not only through decisions, but also non-decisions and relations between groups. This includes the power to withhold or ignore decisions or actions (Bachrach and Baratz, 1962), through the diffusion of priorities and behavioural norms of ideology which act to shape agendas and mould interests. The debates about the role that planning has played in rebalancing or distributing power includes the neo-Marxist critique of planning outcomes which assert that urban planning has reproduced the socio-economic *status quo* of groups in society (Harvey, 1973; Lefebvre, 1968). Such recognition and assessment of the exercise of power and its impact on different actors and interests have been a concern over time and our approach recognises the realities of power struggles and the democratic deficits that often characterise policy regimes (see Metzger, 2011). Parker and Street (2015), drawing on Chantal Mouffe's work, argue that power in this view rarely 'prevents' conflict but instead requires actors to develop strategies to manage it – to 'modulate' conflict, subjugate resistance or deflect challenge in a contested environment.

Similarly, Mitchell Dean's work on power refined and encouraged analysis of governmental practices via detailed study of rationalities and technologies of government (Dean, 1994;

1996). These two elements were presumed to together shape the exercise of governmental power. Technologies of agency embrace the means that enable individuals to meet governmental objectives. Technologies of performance involve the mechanisms whereby individuals, often professionals, are mobilised to operate in spaces which are subject to calculable regimes. These technologies may be sustained as part of a strategy of governance and are recognisable in the '*bundle of techniques, knowledges, representations, mechanisms and practices through which we are governed and we govern ourselves*' (Davoudi and Madanipour: 2013: p.552). In this way such technologies act to organise activity and align it to particular aims in particular ways.

Foucault's attention to discourse, and by extension text, is marked by the simultaneously inclusive and exclusive terms reckoned by the author. Foucault attends to the idea of power through text as discussed by Turner (2001: p.308), which necessitates '*analyses of the power of texts to co-ordinate large scale state institutions in local and complex sequences of action [which] are central to the larger inquiry into planning relations*'. This perspective derives from Foucault's earlier work (1970; 1977) and is highlighted by Thrift (2000) and Muller (2013) in directing attention to the small details of wording that reflect power (highlighted later in SCIs) and in formal plans (Tett and Wolf, 1991; Wilson, 2009), as well as micro activity and power plays found, for example, in meetings and other texts (Freeman, 2019).

Rose and Miller have examined how texts are a means of exerting control over readers in their work (see Rose and Miller, 1992; Miller and Rose, 2008). Rose and Miller (1992: p.185) also explain how the rendering of a particular representation of reality, of the possible, as a visible and apparently durable form, assists in asserting such control: '*By means of inscription, reality is made stable, mobile, comparable, combinable. It is rendered in a form in which it can be debated and diagnosed. Information in this sense is not the outcome of a neutral recording function. It is itself a way of acting upon the real, a way of devising techniques for inscribing it in such a way as to make the domain in question susceptible to evaluation, calculation and intervention*'. As such, Rose et al. (2006: p.101) discerned the '*need to investigate the role of the grey sciences, the minor professions, the accountants and insurers, the managers and psychologists, in the mundane business of governing everyday economic and social life, in the shaping of governable domains and governable persons, in the new forms of power, authority, and subjectivity being formed within these mundane practices*'.

In the context of calls to foster collaboration and co-production (Galuska, 2019) it is useful to respond to calls for analysis of the mundane and procedural in planning, which have seen only limited attention and yet which provide a structuring environment for action that variously prioritise certain options, maintain status quo positions and evacuate possibilities - and to examine the ways power inscribes (particular visions of) the future through texts. How policy and written inscriptions belie intent to do and *not to do* are relevant in this consideration of power and participation. We highlight how and why a policy tool introduced to provide a mandated basis for community empowerment *actually* serves the interest of the author rather than the reader or supposed beneficiary.

Further consideration of ideational forms of power (cf. Carstensen and Matthijs, 2018) highlight how governments, in pursuing ideologically influenced agendas, sustain multiple and sometimes contradictory logics (Brownill and Carpenter, 2007; Parker et al, 2021b). Haugaard (2012a,b) argues, after Foucault, that social subjects construct themselves in response to their context(s). In this view, actors internalise practical knowledge of 'reasonable' social reproduction and their behaviour reflects their disposition. This is particularly relevant here as SCI texts are offered up routinely in (politicised) planning discourse as variously being 'the best option' or 'the only practical way'.

As Gaventa (2007: p.205) asserts the faces of power need to be kept in view and they must also be understood in relationship to each other. Haugaard (2012b: p.353), also points to '*how these forms of power are usually found together, and in the ways they are mutually constitutive as social processes*'. Such recognition also responds to the view that '*the possibility of complementarity of the different power faces and the fact that we could find different power faces at play all at once*' (Kuindersma, et al., 2012: p.415) and this is important in understanding how power is mobilised in planning and how participation is managed. When an actor *exerts* power, it is others who perform the action or are otherwise occasioned to *inaction*. In this way inaction conceals earlier action, prior assembly or association to mobilise or stabilise an intent. If an actor has the wherewithal to exert power without 'doing' anything then a measure of success is to maintain equilibrium, this 'nothing' is a choice and an outcome.

Analysis of interactions between the local authority and the community it serves enables a focus on both the non-visible and apparent aspects of power as the LPA seek to retain control over the performance of planning. Flyvbjerg (1998) warns that concentrating on the most visible aspects of power, such as episodes of confrontation, may result in an "*incomplete and*

biased picture of power relations” as ‘stable power relations are more typical of politics, administration and planning than antagonistic confrontations’ (p.230). In adopting a more nuanced perspective on the operation of power, he asserts: ‘Power determines what counts as knowledge, what kind of interpretation attains authority as the dominant interpretation. Power procures the knowledge which supports its purposes, while it ignores or suppresses that knowledge which does not serve it’ (ibid p226).

Brownill and Carpenter (2007) observed the distortion of communication, but we highlight that the masking of the operation of power can be organised to serve the interests of the powerful and result in outcomes reflecting the interests of entrenched power. This includes the local authority itself; especially given its concern to meet other targets and demands of power exercised on them by central government and the development industry. This framing keeps in view the governmentalities of conduct exercised through text. Particularly given that, shortly after SCIs were introduced, Brownill and Carpenter warned that *‘the opportunity is there for local authorities who do not accept the importance of public participation or to marginalise it or pay lip service’* (Brownill and Carpenter, 2007: p.627); and where local authorities may tactically embark on *“modifying or curbing influence over a local community’s expressed needs and aspirations”* (Parker and Street, 2015: p.801). In this way commitments are variously discounted, qualified, made contingent or otherwise rendered vague.

Methods

SCI production reflects how policy documents mirror a changing balance of power between competing discourses as part of the ‘discourses in text approach’ (Mazza and Rydin, 1997). In terms of epistemology, we accept a broad view of discourse, but this paper focusses on particular outputs in the form of finalised SCI documents. Rather than set out to provide a hermeneutic textual interpretation (Ricoeur, 1973), we more straightforwardly point toward the presence and absence of keywords and qualifiers that act to render SCIs operable on the terms maintained by the LPA over the ostensible goal to mobilise local communities. This approach allows a reading of texts to discern the intent and likely implications of the SCIs as a means of power shaping agency through text, rather than performing a holistic discourse analysis.

In order to comprehend the overall content and orientation of SCIs, first a baseline study was conducted based on a review of 50% of all SCIs extant across England (n=164) to ascertain the coverage, age, length, and useability of the SCI documents. This sample included a selection from each of the regions of England (see Table 1) and all LPAs in the South East.

Table 1: Selection of SCIs from across English Regions:

English Region	SCIs Reviewed
South East	64
London	12
South West	10
East of England	17
East Midlands	9
West Midlands	8
North West	20
Yorkshire & Humberside	8
North East	12
National Park Authorities	4
Total	164

The second element of the study explored the actual use and experience of SCIs through eight case study SCI areas (*Bristol City Council, Oxford City Council, Selby District Council, Sunderland City Council, Liverpool City Council, High Peak Borough Council, East Hertfordshire District Council and North Warwickshire Borough Council*). One case was selected from each of the regions across England to provide a cross-section of examples and excerpts to illustrate the SCI key features. The LPAs were also selected on the basis of exhibiting *prima facie* evidence or claims of going beyond basic statutory requirements. Semi-structured interviews with community representatives and LPAs were conducted in these areas to derive primary data totalling 16 interviews. The primary data was analysed using open and focussed coding to create the SCI producer / user themes.

Findings: SCIs in practice

Our baseline findings of 50% of all SCIs in England show they tend to follow a generic structure of outlining the statutory obligations presented in national legislation rather than developing more locally specific approaches to respond to their communities. Furthermore, the majority of these LPAs did not use any local information or data to inform the production of the SCI. Even more crucially none stated that they included communities in the production of their SCI but instead relied, somewhat ironically, on the use of a standard consultation as required in regulation. Whilst many SCIs explicitly recognised social diversity within the community they serve, it is less clear how they actually engage - although a subset did list a range of different mechanisms. Some LPAs mentioned deliberative forms, including panels, forums and focus groups and the use of digital means to engage the public, particularly with reference to the use of social media. Others mentioned bespoke software packages to collate and/or analyse consultation data.

Length, and therefore quantity of text, of SCIs also varied greatly, with a range of 6-57 pages (excluding appendices) identified. Whilst it may be intuitive to view the document length as an indicator of quality or commitment, we found that the longer SCIs often served to provide extended detail which really only complicated and obscured from any actual undertakings being committed to; while the shorter ones avoided such contingency, opting instead to simply cover the statutory minimums required. Here there is power in words used either numerous or sparingly to achieve the same outcomes, but one obfuscates what is likely to actually happen when the content, or rather the *intent*, is deployed in practice.

Table 2 sets out examples from across the English regions where textual contingency is achieved and highlights activity to lessen the scope for resistance to planning applications (which has been a key concern for national government and LPAs over the past decade). Such local practices are also in the interest of central government and together the rationales and the behaviours sustained has conspired to reward limited ambition and vague definition.

Table 2: Examples of SCI contingency across the English regions

[table appended]

The specifics of wording are crucial here as they transform undertakings and commitments into contingent promises, taking a typical example of SCI text below (e.g., Camden Borough

Council) highlights the issue with three elements presented. The first declares that *constrained resources* mean readers should accept curtailment, the second reassures the reader that *legal requirements are being met* (i.e., that the document has legitimacy), while the last excerpt qualifies performance by the simple yet powerful insertion of the word *may*.

As Camden continues to receive less funding from Central Government it becomes necessary to take tough choices about funding local services. Opportunities to find cheaper and more effective ways to engage with those who live, work and play in the borough must be considered. While the Council is keen to engage, beyond the statutory minimum this must be as cost effective as possible. (Camden Borough Council SCI, 2016: p.3).

In the second instance the SCI author states that:

Our planning and regeneration service's consultation practice meet our legal requirements for consultation on plan making and planning decisions. We will review, and, wherever possible, seek to improve how we consult and involve the community, subject to the availability of resources and other relevant considerations (Camden Borough Council SCI, 2016: p.6).

Thirdly, and in particular, analysis of the 'little things' that are deployed but which are easy to ignore have marked significance. Thrift (2000) argues that power is expressed in detailed wording such as 'may' or 'if' and whose contingency evacuates the certainties of inscriptions that bind actors to performance both in terms of 'power to' and 'power over'. The same SCI, when describing the methods to engage with communities, qualifies and renders contingent every option by doing just this and features the word 'may' in each of these listed mechanisms (bar one where the vagueness of the line suffices without it):

- *Website - All planning policy documents, consultations and supporting information will be available on our website. We **may** also use the website for online comment forms, questionnaires and feedback or other consultation websites such as vox up.*
- *Social Media - We **may** use social media, such as twitter, or online blogs.*
- *Email - We will use emails as our main method of communication. Emails **may** include information on consultations, responses, and the stage of preparation reached, adoption and general updates.*
- *Planning Policy database - We will email updates from this database to keep people updated on all relevant planning policy matters. [note: no use of a qualifier as the term 'updates' is sufficiently vague]*
- *Local press - We **may** advertise certain consultations and stages of plan preparation in the local press. These adverts will let you know where you can find more information and how to get involved.*
- *Meetings - We **may** meet with groups and organisations relevant to the document being prepared. We **may** also hold public meetings where individuals can contribute their thoughts.*
- *Attending group meetings - We **may** offer to attend meetings which are held by existing groups to discuss, clarify or explain issues or documents.*

- *Workshops* - Workshops and facilitated events **may** be appropriate to discuss issues in detail and ensure that a range of people have a chance to express their concerns.
- *Exhibitions* - Exhibitions **may** be used to explain specific proposals and, when staffed, are useful for clarifying our approach and generating feedback.
- *Targeted meetings* - It **may** be necessary to arrange meetings with groups who do not normally respond to planning consultations to make sure their views are heard.
- *Local publicity* - Where appropriate, additional publicity measures **may** be taken at a local level. (Camden Borough Council SCI, 2016: p.12 - our emphasis).

This framing emphasises how ‘...a lot of the ‘little things’—‘mundane’ objects like files, ‘mundane’ people like clerks and mundane words like ‘the’— which are crucial to how the geopolitical is translated into being’ (Thrift, 2000: p.380) reflect power. Turner (2001: p.299) specifically examined local authorities and their ‘text-based organization of the extended relations in which the institutional modes of governing and its politics are put together’ and urges that researchers understand the implications of such texts in use as well as production.

It is also notable that section 3 of the Neighbourhood Planning Act 2017 states that: ‘*The Secretary of State **may** by regulations prescribe matters to be addressed by a statement of community involvement in addition to the matters mentioned in subsection...*’ (our emphasis). This acts to retain national control over SCIs to be amended if implemented. Whilst we have not reviewed national planning documents, there is clearly political work / power enacted through vagueness (and conflicting) requirements which are passed down to the local level.

The Planning Authority Perspective on SCIs

The LPA case studies interviewed appear to view SCIs as a potential rod for their own back without careful management of the wording of the SCI document. The national context had created a perverse incentive for LPAs to be vague or imprecise when outlining their community involvement strategy, given that the document is intended to hold the council accountable and to provide transparency. By way of explanation, it was posited that “*The SCI is everything and nothing. It says what you could do but doesn’t prescriptively say we will do that, otherwise we wouldn’t have any flexibility. We didn’t want to set a rigid process to follow. We need the flexibility to respond according to local issues or political drive...If we are too specific and can’t achieve it then it is going to be a challenge. That is the reason why the SCI is high level*” (LPA#8). This use of the term ‘high level’ may also be characterised as vague and the ability to maintain flexibility over their community strategy is of course largely of benefit to the LPA.

Numerous SCIs explicitly mention the costs and resources involved in community involvement and a need to be 'proportionate' or 'realistic' in the approach adopted which influenced the undertakings made in the SCIs. The case study LPAs were cautious of going beyond statutory requirements because *"incorporating local innovations could significantly impact on the speed and cost of plan-making. The view [in that LPA] was that this was to be avoided"* (LPA#5).

It was clear that LPAs did not want to 'over promise' or take risks and this was underpinned by various forms of expectation management. One highlighted the balance *"to be ambitious but don't promise things you cannot deliver...It is important that you can say things in the document but need to be sure that you have the resources to deliver"* (LPA#1). This was also emphasised in the need for SCIs to be *"written in a way that's reasonably flexible, that doesn't overly commit us, or unreasonably commit us to certain things. I think we've been careful not to fall into that trap of maybe raising an expectation that we couldn't possibly meet"* (LPA#2). This point was echoed: *"Once you put into a document that you are going to do a thing, you are required to do it"* (LPA#3). Similarly, LPA#8 stressed that *"the biggest challenges are resources, time, and skills...having the right people with that experience of running those events and having particular community engagement specialists"* and *"making sure that planners have got the most up to date training"*.

It was acknowledged however that such an approach is problematic, given that *"in terms of the expectations, people do feel let down when they express their views and we haven't followed their wishes and not listened...Some people may not come back to us and not bother again"* (LPA#6). The problem of not trying to go beyond legal requirements was also highlighted by LPA#1, showing awareness of the deficit existing: *"Trust and openness and transparency in the planning system is fundamental. If you don't get that right – people aren't going to engage unless they see the system as open and democratic"*. Without these, community involvement can become a superficial exercise that ironically can make the existing relationships worse.

There was also a mixed response to whether or not the SCI impacted on the quality of community engagement. One LPA interviewee argued *"I don't think it has. As planners we want to engage people...we can do that with the SCI, but we are always thinking how can we tap into other things. It has not helped us to strive"* (LPA#3). Another brushed off the need to refer to the document because *"the SCI are so well embedded into our thinking, when we do engage, that we almost don't have to go back and look and check to see that we've done what"*

the SCI is saying, because that is so well drilled into what we're all doing" (LPA#2). LPA#8 noted that having an SCI helps to set out a clear framework and provide transparency, and for those reasons are worth having, but that: *"Lots of people don't understand what it is...I don't think that having the SCI means that the local authority has great engagement – the reason they don't is because of resources, what they have to do and the priorities in the local area"*. These accounts suggest a dim view of their practical usefulness by planners and how they are pegged to the preference of the LPA rather than to the quality of engagement produced.

Looking to the future, LPA#8 pleaded that *"what I would say to those working on the [2020 planning] reforms is to make sure that community engagement isn't just included as a nice thing put in to appease the public. There has to be considerable thought put in to make it effective. Don't set a restrictive timescale that means that it is going to make innovative engagement difficult"*. This underscores the role of central government in delivering culture change, where refreshed and reframed SCIs could be an important element in achieving the aim for *'world-class civic engagement and proactive plan-making'* that the UK government aspired to in the 2020 Planning White Paper (MHCLG, 2020). However, this would require acknowledging how power is being performed by actors at the national and local level through technical and nebulous requirements and documents to manage external inputs. Not least the government drive for 30-month Local Plan production through *'frontloading'* stages.

The Community Perspective on SCIs

The Community view of SCIs was also quite dismissive in terms of their role in the production and content, but recognised their potential – that a statement of the rights of the community and obligations of the LPA is needed. As one community respondent opined: *"we have to have these documents otherwise we can't go back to refer to any plan or direction we are trying to achieve. If that direction isn't right, then we can challenge, it is essential to have as a foundation to work from. I think it is a good thing to have, it's wordy, but I cannot see alternatives. It's not an easy document to use"* (CR#9). Another community respondent also highlighted that *"an awful lot depends on the underlying ethos of the LPA. If they take the view that we have to prepare this because it is a statutory requirement then very little impact occurs; however, if they take view that consultation and community is an important part of the planning process then it is different"* (CR#10). This highlights the power of text reflects the LPA culture.

When asked what helps facilitate the way they make representations to the council, the community interviewees did not recognise the SCI at work and none referred to this as helping to facilitate in their experience of making comments on plan-making or planning applications.

Indeed, whilst all LPA respondents reported that they had consulted the public on their draft SCI, they stated that most had attracted very few comments. Yet one community respondent felt that they “...*don’t see how we could have been involved*” in the production of the SCI, or if they had been invited to participate that “*I think it might be a box ticking exercise.*” Similarly, it was felt that the consultation was “*a matter of form, they [the LPA] redrafted [the SCI] because they had to, and it wasn’t seen as an opportunity to engage*”. Another community interviewee stated that “*they haven’t needed to look for the SCI*” (CR#1) because it was simply regarded as a procedural document. For some, especially those community interviewees who have been involved with planning for many years, it was felt that they were “*wasting their time*”. This was because although they could submit their views within the scope of the SCI, often there was no communication received back from the LPA or any indication about how the feedback was used. This highlights how feedback and explanation of the ‘you said, we did’ type has not been adopted by at least some LPAs. Despite these views, one acknowledged “*all people should be aware of the SCI and point to clauses to hold them [the LPA] accountable*” (CR#6).

These findings suggest that SCIs are useful for LPAs to manage local inputs into planning given other pressures on their time and resources. The gesture of wanting to go beyond the statutory minimum and improve participation was expressed by the case study planners, but always within the confines of what they considered ‘possible’. At best this is a position to sympathise with, given the constraints placed on the public sector over the last decade, but at worse this excuses any lack of commitment to engage locally. Whilst the first barrier for communities is being unaware of what SCIs are, or how to find them, the second is the power of text used to merely inform or obfuscate rights or options. Finally it is the contingency placed on anything beyond a formal requirement from government that undermines the ability of local communities to hold their LPA to account for anything more locally.

Overall, the value attached to SCIs by both local authorities and community representatives is indicative of their value and also reflects the uncertain future of SCIs in the English planning system. Since 2010 Conservative-led governments have pursued an agenda of ‘streamlining’ and ‘simplifying’ the planning system and documents such as SCIs are candidates to be removed if they are merely seen as ‘clogging up the system’ or where their value is unclear.

Discussion

Our interpretation of the data is that SCIs are instructive because light is shed on how technologies of governance are both shaped and elided or circumvented in practice. In this case, how local actors can craft technologies of both agency and performance and bend them to meet their objectives in seeking to reconcile, or apparently reconcile, competing governmental logics (Parker, et al. 2021b).

In this way the SCI reflects particular power relationships between the national and the local and between the local and communities, rather than one that is (co)produced for the benefit of the intended audience of the policy i.e. local communities. As we have shown, the initial optimism about SCIs was never realised and early warnings about the potential manipulation of such policy instruments appear to have been vindicated. What has happened in our assessment is that local authorities have attempted to fulfil obligations to national statutory requirements and sustain hope by the creation of the SCI and its text, yet the design and contingency exhibited ultimately obscures actual intent and limits progressive potential. In this way, the text is not definitive but instead is rendered contingent by the use of 'small words' to maintain the ability to circumvent commitments. We view this as a result of LPAs having other masters to serve, rather than the community, and other limitations of time and resources.

We have sought to highlight the deployment of a particular form of technology of performance where SCIs documents became less about performance and more about *non-performance*; a form of non-decision enabling approach that has emptied the SCI project in its attempt to perform both the active citizen and local government. This has had the effect of maintaining control over what actually happens and who influences local planning, in particular to retain control by the local authority. The work the SCI texts do, instead, is structure the local public as subjects to be engaged with at the discretion of the local authority, render contingent forms of engagement, and narrows what is both said and done in the name of public participation.

In the context of sustained calls for greater participation in planning, and the apparent rights and freedoms offered, we can see that citizens are not governed less but governed more efficiently and more effectively. As we have explained this highlights necessary consideration of the orchestration of power operating through such texts.

This widened focus on the modulation of planning practice should form an important part of planning research, whether analysing plans or examining supporting instruments that act to shape the form and sources of inputs - they act to shape the power to plan and plan to power. This appreciation stresses the need to assess how the dimensions of 'power over', 'power to', and 'power with', are combined and interact. It is argued that combinations of techniques and effort are assembled to socialise and reify public participation. In this case to allow the SCI to construct the limits of participation as part of the exercise of social power. SCI text enacts different political work *simultaneously* for each 'audience' of the document. For government, it *meets the statutory requirements*, for the local authority it *protects resources and circumvents additional undertakings*, and for communities it appears to offer enhanced access to planning, while *placating demands for involvement*.

However, the risk taken by the LPA to limit participation, given the SCI's stated role to set what is to happen, means that these documents can also be used by communities to challenge as much as to manage inputs and constrain participatory action. Whilst publics may be deterred, managed or co-opted into participation that is convenient; the underlying principle of SCIs and other (potentially) participatory tools highlight that community groups may seek other ways to destabilise the technologies and texts created to perform them. SCIs and other forms of inscribed power, are therefore, always open to unfixing.

Conclusion

This paper has applied a Foucauldian inspired analysis of power to SCIs in England. In doing so it has sought to draw attention to how LPAs have produced SCIs so that they do not perform beyond the specific confines set within their wording and the implications for (in)action. As such the potential or actual empowerment potentials of SCIs to clearly lay out the rules of the collaborative planning arena have been somewhat overstated and remain largely unrealised. The exercise of power is discerned in decisions and non-decisions, and in the mundane and how ideas are inscribed, emasculated or omitted. The form and use of the SCI is illustrative of the use of power where the text is used to mobilise power through interaction between itself and the reader where ideas are managed or curated to perform agency.

The first contribution has been to provide the first targeted review of SCIs in practice by LPAs and communities since their adoption in 2004. This has highlighted that the expectations from

communities about the usefulness of SCIs were low or absent, particularly given that there has been little or no community involvement in their production, use or monitoring. It also brings into focus SCIs role in conditioning participation as part of the 'modulation' of actor behaviour as LPAs attempt to manage public inputs and help to protect resources and staff workload.

The second contribution of this paper has been to highlight the operation of power behind a seemingly mundane document with the ostensibly progressive goal of improving public participation. Here we contend that the lack of explicit clarity over national government requirements for participation allows LPAs to orchestrate public engagement on their terms. This uncertainty opens up space for LPAs to operate in their own self-interest while placating central government and the local community.

The analysis presented here emphasises that planning researchers should pay particular attention to how planners, policymakers, communities and others work through texts to encourage or bound practices (that is to include or exclude actors or ideas). This requires not only public planners to recognise how the wording of policy documents impact on and socialise behaviours, expectations and actions of others, but also for communities to gain awareness that these are key mandating tools, ostensibly produced and maintained to activate and enable participatory rights. We contend that such reflections become critical if public trust and accountability in planning systems and local government is to be improved in the future.

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Table 2: Examples of SCI contingency across the English regions [Here]

LPA (Region), SCI date	Disabling text exemplars / SCI link	Comment
Camden (London), 2016	Extensive use of the word 'may' to condition the approach used (page 12 and see main text).	The SCI sets out many options and tools for community involvement, but all are rendered contingent by the use of 'may'.
Bracknell Forest (South East), 2014	Use of vague terms such as 'seek to use' deployed: <i>'there are a range of ways in which the Council will seek to engage with bodies and the local community'</i> (p24).	Approach advocates that 'the nature of consultation will need to be proportionate, and tailored accordingly' which renders the terms of the engagement contingent.
Cornwall (South West), 2018	Methods are conditioned by the use of 'could' e.g. <i>'...various methods that we could use to publicise our consultations during statutory consultations'</i> (p6).	Laudable appreciation of engagement shown but the insertion of the word 'could' renders any of the content relating to what and how conditional.
Norwich (East Anglia), 2016 (with Covid amendments in 2020)	A different way of limited consultation by placing stress on the word 'endeavour': <i>'Based on our current success and lessons learned from previous consultations, we will endeavour to use a range of consultation approaches, as necessary...'</i> (p14).	This SCI attempts to persuade the reader that the LPA is learning and improving, although without any guarantee that the community will be involved in particular ways.
Dudley (West Midlands), 2020	the commitment is limited by placing the terms 'for example' at the end of a key paragraph and before listing means to consult: <i>'consultation is a fundamental part of the planning process, it generally incurs direct costs in terms of resources and staff time. However, the use of technology and new and innovative means of communication has helped effectiveness and efficiencies, for example...'</i> (p34).	This Authority provides itself the flexibility to choose by outlining appropriate tools as examples of how they may approach consultations. They also highlight how certain approaches aid their 'effectiveness and efficiency'.
Derby (East Midlands), 2017	Page 6 the use of the qualifier 'may' appears directly above a table where most consultation options are described as 'optional' for the LPA to deploy: <i>'We may use the following methods of consultation in the preparation of our Development Plan. The methods required by the Town and Country Planning (Local Planning) (England) Regulations 2012 are highlighted in yellow, the rest can be considered to be optional and used as, and when, the Council feels appropriate'</i> (p6).	The Authority is quite open about their statutory responsibilities and how limited those actually are in respect of consultation methods.
Wyre (North West), 2010	<i>'the Council recognises that different methods and approaches will be required for particular types of document. the key areas of consultation activity for each type of document and then suggests a range of potential consultation methods which may be used'</i> (p17).	The SCI caveats how things will be done by the use of the term 'suggests'.
East Riding (Yorkshire and Humber), 2020	<i>'the council wants to consult widely and effectively, to ensure meaningful yet cost effective community involvement'</i> (p7) which is followed by a table where all options are caveated by the term 'may': <i>'What the council may do'</i> (p8).	Use of the qualifier 'may' keeps in the hands of the LPA, control over the approach. Very similar in approach to the Camden example above.

Northumberland (North-East), 2015	<i>'the Council will create opportunities for the whole community and all relevant stakeholders to be involved in developing policies and proposals for Development Plan Documents. This will include, where possible and appropriate' (p13).</i>	The SCI in this case shows awareness of participation and appears open to progressive involvement but reverts to the caveats of <i>'where possible'</i> and <i>'appropriate'</i> .
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