

Report to Local Plan Cabinet Committee

Report reference: *LPC-010-2012/13*

Date of meeting: *25 March 2013*



**Epping Forest
District Council**

Portfolio: Planning and Economic Development

Subject: Local Plan Communications Strategy

Responsible Officer: **Kassandra Polyzoides** (01992 564119).

Democratic Services Officer: **Gary Woodhall** (01992 564470).

Recommendations/Decisions Required:

- (1) To agree the updated Local Plan Communications Strategy; and**
- (2) To note that it is a dynamic document to be updated as needed to meet the requirements of the Local Plan consultations.**

Executive Summary:

An early version of the Local Plan Communications Strategy was submitted and approved as the Local Development Framework (LDF) Communications Strategy at the LDF Cabinet Committee in November 2010. Since then the Council has consulted on the Statement of Community Involvement (SCI), that sets out the minimum consultation methods the Council will be required to undertake during the preparation of Local Plan. The Local Plan Cabinet Committee approved the SCI in February 2012 to go to April's full Council for adoption.

Many recommendations and feedback received as a result of the SCI consultation between July and October 2012 were more relevant to the communications strategy and have been incorporated in the current draft document. The Strategy sets out an approach for ongoing engagement with key stakeholders and interested parties including the community during the preparation of the Council's new Local Plan. The Communications Strategy outlines the engagement methods used for the Local Plan consultations to date. In looking forward it also identifies which successful approaches to carry forward, additional methods of engagement and issues that should be resolved. The main aim is to provide an array of methods by which our stakeholders can engage and for the Council to maximise the representations received during the preparation of the Local Plan.

Reasons for Proposed Decision:

Effective communication is key in order to engage successfully with stakeholders, particularly with the general public where consultation fatigue and previous negative consultation experiences can act as a barrier. The communications strategy will allow for more clarity and transparency in the Council's approach to community and wider stakeholder engagement.

Other Options for Action:

To not approve the communications strategy and rely on the SCI should it be adopted by full Council in April 2013

Report:

Principles

1. A series of principles of engagement have been developed, based on experience to date and best practice aimed at providing clarity to our stakeholders of the Council's intentions when carrying out Local Plan consultations and in order to ensure a consistent approach:

- Public involvement should be transparent and accessible and seek to reach as many local residents and businesses as possible;
- Engagement with the local community should form part of a continuous programme, not be a one-off event;
- Consistent branding should be used across all Local Plan media. The Planning Our Future logo to be used on all communication material;
- Consultation and communication methods used should be appropriate to the communities concerned;
- Partnership working. Work closely with other departments within Epping Forest District Council. There may be opportunities to link in with other consultation activities and use the feedback received;
- Information gathered through other consultations should be used wherever possible – e.g. The Local Strategic Partnership consultation for a revised Sustainable Community Strategy in the past has formed part of the Local Plan evidence base;
- The level of community involvement should be appropriate to the role of the plan or study in question;
- Accessible report summaries of planning documents should be produced where appropriate; and
- Any consultation method should be designed to ensure that meaningful feedback is achievable within the Council's resources and Local Plan timescales.

Duty to Co-Operate

2. The Duty to Cooperate (Localism Act 2011) outlines the requirement for Local Authorities to explore and act on their common strategic priorities and strategic cross boundary issues with their neighbours and statutory bodies. This involves engaging constructively, actively and on an ongoing basis in any plan making process. The interpretation of the fulfilment of this duty is such that authorities need to effectively resolve the strategic cross boundary issues not just discuss them.

3. A detailed programme of engagement under the Duty to Cooperate is being addressed separately to this document. It is envisaged that the Duty to Cooperate engagement programme will be incorporated in a future updated version of this document.

Branding

4. The development of an identity or 'brand' for the Local Plan has been an important

element of our communication strategy and creating public awareness around the delivery of the Plan. It has enabled the Forward Planning team to demonstrate linkages between different components of the Local Plan and also provided the opportunity to project a more positive image for the Local Plan and highlight its importance.

5. All Local Plan materials now incorporate the Planning Our Future logo and colour scheme. Examples of this are:

- Formal letters (during consultation periods)
- Press ads
- Forester special edition and articles
- Internal Local Plan memos / meeting notes
- PowerPoint templates
- Consultation materials
- Workshop/drop-in session materials
- Exhibitions
- Local Plan website
- Social media-Facebook and Twitter

Consultee Groups

6. The Forward Planning department already maintains an up-to-date database of relevant consultees and this will be used to form the groups set out below. In order to tailor our approach to the needs of our stakeholders and in accordance to best practice and statutory requirements the Council has created three distinct consultee groups. The consultee database used for the Community Choices consultation contained 11,813 records of various bodies and individuals and this number has grown significantly over the past months with additional stakeholders being added.

7. The Council has a statutory duty to consult a range of consultees, some of which are residents and businesses, general consultees and others named as specific groups in the 2012 Plan Making Regulations.

- **Specific and technical consultees** – Consultees in this group include adjoining local authorities, Parish Councils, English Heritage, Thames Water. All of these groups are involved during consultations and some are also invited to specialist technical workshops.
- **General consultees and residents** – The Council has discretion over precisely which general consultees it consults but they represent people with an interest in the local area. The Council has decided to get as many contacts as possible under this heading. These contacts include local residents, schools, commuters, local voluntary bodies, religious groups, residents' associations, local businesses and action groups. It is each groups responsibility to notify the Forward Planning team that they want to be on the general consultee list.
- **Other interested parties excluding residents and businesses** – In some cases this would include residents or businesses in neighbouring authorities expected to be directly affected by proposals in the plan. Others can include regional/national bodies including, Friends of the Earth, etc.

8. Targeted consultation methods used for each grouping are available in the Communications Strategy.

Consultation Stages

- **Community Visioning**

9. The main consultation methods used for this stage of consultation were:

- (a) Leaflet/Questionnaire - this was sent to all households in district and special version was in the Forester magazine;
- (b) Postcards/Photography competition - which was handed out at all stations in the district during am and pm peak hours; and
- (c) Launch of Planning Our Future website and new logo-all material was re-branded and relevant information and consultation material was available online.

- **Community Choices-Issues & Options**

10. The main consultation methods used for this stage of consultation were

- (a) *Leaflets* sent via a distribution company to all households and business addresses within the district;
- (b) *A summary of the consultation document* was prepared, of which we sent out email/paper copies to town and parish Councils and residents associations that we knew of, on 2 August;
- (c) *Letters (2-sided)/emails* to anyone who has been involved in a planning policy consultation in the past (via the contact details they gave us at that time), and statutory consultees etc. notifying them of the consultation (over 8,000 people, bodies etc.). These were sent out on 26 July;
- (d) *Letters (2-sided)/emails* to anyone who owns land within any of the potential development/ opportunity areas within the consultation document (from a Land Registry search), asking whether they are interested in their land being considered for potential future development and inviting their comments on the consultation;
- (e) *Letters (2-sided)/emails* to all those who submitted land for consideration through the Call for Sites, stating whether or not their site had been included in the consultation at this stage and inviting their comments on the consultation. These were sent out on 26 July;
- (f) *Static exhibition at the Civic Offices* and libraries for the whole of the consultation period, with banners, hard copies of consultation documents and a ballot box to leave comments in;
- (g) *Drop-in sessions* held across the district;
- (h) *Website* - online information and questionnaire;
- (i) *Facebook/twitter*;
- (j) *Press briefing and press releases*;
- (k) *Information packs/documents* to all Town & Parish Councils and known residents' associations; and

(l) *Commuter postcards.*

11. Multiple copies of the Community Choices document, questionnaires and supporting documents were prepared for all the town and parish councils for collection. Additional copies of all the consultation material were available at libraries, the Council offices and at the drop-in sessions.

12. A full list of the engagement methods used during the Community Visioning exercise can be found in Appendix 1 of the Local Plan Communications Strategy document

Lessons Learned from the Community Visioning and Community Choices Consultation

13. There were some key lessons learned from the Community Choices consultation, which have been outlined below to be taken into account and addressed prior to the Preferred Options consultation:

(a) *Website* - The ease of navigation of the website will need to be improved. In particular the Council's homepage for the duration of the Preferred Options consultation will need to have a static one-click logo to a Local Plan consultation landing page;

(b) *Questionnaire* - The consultation software/online questionnaire will need to be simplified, streamlined and be in plain English;

(c) *Consultation Documents* - To be simplified and streamlined and where possible in plain English;

(d) *Letter distribution* - The approach of using leaflets will need to be reviewed. It may be more appropriate for a letter to be sent to each household and businesses, with clear markings of its content on the envelope. The use of an alternative distribution company will also be explored; and

(e) *Publicising the choice of response methods* - Consultation documents and online information to clearly outline all routes for representation submission.

Forthcoming Preferred Options Consultation

14. In addition to streamlining the consultation methods used during the Community Choices consultation, the Council is exploring additional methods of engagement for the next stage of the consultation. More investment in PR, emphasis on early engagement with the press and advertisement campaigns will be a key focus.

15. As the work progresses to complete the Preferred Options consultation material, it will become apparent which approaches and methods will be appropriate to be used during the consultation. The report to Cabinet and full Council on the Preferred Options consultation will also include a detailed breakdown of all the consultation methods to be used.

16. The key consideration is that the ongoing consultation programme is tailored to the requirements of the engagement activity at that stage and guarantees maximum stakeholder input. The need to simplify the consultation documents and plain English the text is key in ensuring stakeholder engagement and input. The list of consultees has been updated substantially following the Community Choices consultation and this will be used for the circulation of consultation information for the Preferred Options.

17. In addition to engagement methods used for the Community Choices consultation outlined in Appendix 1 of the Communications Strategy, the following may also be pursued:

(a) *Better use of the Forester magazine* - Both its current programmed editions and a special edition will be used to inform and engage with residents. In addition, more intensive media launches and engagement with the local press will be pursued with full ads being taken out in printed and online press and blogs as required.

(b) *Summary document* - This can accompany the letter informing consultees of the consultation launch. Sending the Preferred Options document to everyone in the district would be very expensive. Stakeholders will be advised of where hard copies of all consultation materials can be found. All relevant, supporting information will be made available on the Planning Our Future website at the launch and for the duration of the consultation.

(c) *Area focused consultation activities* – there may be cases where area based intensive consultation such as local workshops, door to door publicity or community presentations for directly affected communities will be suitable at the preferred options stage of the plan where sites will be proposed for allocation. Such approaches will be considered and balanced against the resources available and effectiveness of other, less resource intensive methods.

(d) *Cascade* – Dedicated briefing packs were provided for Town and Parish Councils for the Community Choices consultation. The use of briefing packs to enable Town and Parish councils and other groups to carry out their own detailed consultation event on the preferred strategy will be considered as this may prove a more cost effective way to develop more local approaches.

18. As mentioned the consultation questionnaires will need to be carefully developed to engage more widely with the desired audience and provide meaningful feedback. The questionnaire for the Preferred Options consultation will be designed to be helpful, engaging, accessible and user-friendly.

19. These approaches should ensure that previous issues are overcome, stakeholder input increases even further, the format of the feedback is manageable and our methods of engagement are robust enough to undergo scrutiny at the Examination in Public stage.

20. Consultation programme:

(i) Community Visioning – complete;

(ii) Community Choices – complete;

(iii) Preferred Options – TCB;

(iv) Pre submission publication - 6 week statutory period for representations on soundness prior to submission; and

(v) Examination in public.

Engagement of Elected Councillors

21. Whilst the councillors who sit on the Local Plans Cabinet Committee have a direct role in the approval of the Local Plan as it progresses through the production process this is not the sole area of engagement of councillors.

22. Councillors are given opportunities to attend briefings during the launch period of consultations to ensure that they understand the process, and content of the consultation.

23. A more active use of the councillor network for future consultations is being explored based on the idea of further enabling local councillors to cascade information to their constituents and supporting them in doing so.

Workshop Programme

24. A programme of workshops for elected members of the Council and Parish and Town Councils has been developed for the plan and will continue to be adapted as appropriate. These are not decision making events. The purposes of workshops are:

- To facilitate an in depth understanding of issues in relation to the evidence used to support the plan
- For Members to provide perspectives and steer on issues that the plan aims to address
- For Members to explore the policy choices that the plan aims to resolve
- To provide local perspectives on the potential proposals in the plan and explain the impacts at a local level

25. Three workshops have been held in the period January 2013 to March 2013 covering:

- (i) Update on the evidence base ;
- (ii) Local visions and choices; and
- (iii) Planning the local area.

26. Another two workshops are already in the programme:

- (iv) Population projections and housing targets; and
- (v) Taking the tested options to a preferred strategy.

27. As production of the plan continues it may be that other areas of work would lend themselves to further workshops with elected councillors and these opportunities will be taken and kept under review.

Resource Implications:

The delivery of a comprehensive communications strategy requires the input of officers from Forward Planning and PR. A detailed programme of tasks and events will be developed to allow for the timely allocation of resources to the Preferred Options consultation.

Some of the recommended improvements will add some time to the production of documents and consultation material. This would be offset by the benefits of improvements in their accessibility.

Legal and Governance Implications:

There are no recommendations on any changes to matters of governance contained in this report.

Safer, Cleaner and Greener Implications:

Nothing to report.

Consultation Undertaken:

The SCI was consulted on between July and October 2012.

Background Papers:

- LDF Communications Strategy November 2010
- Statement of Community Involvement- consultation document July 2012
- Statement of Community Involvement- consultation Questionnaire July 2012
- Statement of Community Involvement LPCC report February 2012

Impact Assessments:

Risk Management

Improving our engagement methods may reduce delays in the preparation and adoption of the Local Plan.

Equality and Diversity:

Did the initial assessment of the proposals contained in this report for relevance to the Council's general equality duties, reveal any potentially adverse equality implications? No

Where equality implications were identified through the initial assessment process, has a formal Equality Impact Assessment been undertaken? No

What equality implications were identified through the Equality Impact Assessment process?
N/A.

How have the equality implications identified through the Equality Impact Assessment been addressed in this report in order to avoid discrimination against any particular group?
N/A.