

Report to the Local Development Framework Cabinet Committee



**Epping Forest
District Council**

Report reference: **LDF-010-2010/11**
Date of meeting: **4 October 2010**

Portfolio: Leader

Subject: Local Development Framework - Communication Strategy

Responsible Officer: Kate Hallé (01992 564481).

Democratic Services Officer: Gary Woodhall (01992 564470).

Recommendations/Decisions Required:

(1) That the principles and methods set out in the LDF communication strategy be approved as an approach for involving the local community in the forthcoming preparation of spatial development plans.

Executive Summary:

This report sets out an approach to engaging with key stakeholders, interested parties and the community in the early stages of the forthcoming Local Development Framework (LDF). The Council is committed to providing the local community with opportunities to shape the place in which they live and has developed an approach to engagement designed to make this achievable.

The coalition government has made it one of its priorities to make sure that local people have more say in the decisions that affect where they live. The government has abolished regional housing targets and it is now the responsibility of the Council to work with local communities to determine options for future development.

The strategy has taken into account previous feedback from Members and contains a new section on 'Community Visioning' – designed to engage the local community from the outset of the Core Strategy process. The Community Visioning exercise aims to understand local people's future aspirations for Epping Forest District and what they consider to be the main issues for planning and development.

The results of the engagement will form a key element of the LDF evidence base used to develop the Core Strategy Issues and Options. The communication strategy will be expanded upon to form the Council's LDF Statement of Community Involvement (SCI) and to outline a new strategy for engaging on the Issues and Options in Spring 2011.

It should be noted that the increased requirements to engage with local people will have an impact on officer time and resources. The aim is to produce a communication strategy that is:

- focused using both tested and innovative methods;
- provides an adopted structure/format for officers and the community to work with; and
- is cost effective.

Reasons for Proposed Decision:

To provide a formalised and adaptable strategy for engaging with key local stakeholders and the general public in the production of the LDF Core Strategy.

Other Options for Action:

To not approve a Local Development Framework Communication Strategy. However, stakeholder and public engagement is a statutory requirement in the production of the LDF and the Core Strategy may be found unsound if there is no robust evidence of this.

Report:

Communicating Positively With The Community

1. Positive and effective communication is essential in order to engage successfully on spatial planning, particularly with the general public where consultation fatigue and previous negative consultation experiences can act as a barrier.
2. The Council has previously produced a draft Statement of Community Involvement (SCI) to set out its approach to consulting with the community on the LDF and planning applications. This communication strategy will feed into the development of the SCI which, subject to new changes in the planning system, will be adopted at a later date.
3. The Council has a corporate consultation strategy which is compatible with the approaches set out within this engagement strategy and will be cross-referenced when consultation tasks are developed in more detail.
4. A simple and recognisable brand will be developed to positively encourage people to become more involved with the preparation of the LDF, and give all the documents a common identity. This will include logos, strap lines, and a design theme to emphasise linkages between LDF components and attract attention from the general public. The Core Strategy preparation and evidence gathering (stage one) is a good time to start the LDF's new identity.

Principles Of Engagement

5. These have been developed to ensure a consistent approach that allows the Council to meet and exceed its statutory consultation requirements within all elements of the LDF. These will be expanded upon in the SCI. This approach helps to tailor engagement activities to ensure that the Council gets as much useful consultation feedback as possible within the resources available. Unfortunately consulting directly with everyone in the district is unmanageable in terms of budgets and officer time. The principles are:
 - (a) the level of community involvement should be appropriate to the role of the plan or study in question;
 - (b) engagement should form part of a continuous programme, not be a one-off event;
 - (c) public involvement should be transparent and accessible;
 - (d) consultation methods used should be appropriate to the communities concerned;
 - (e) information gathered through other consultations should be used where possible – e.g. the Local Strategic Partnership has just undertaken consultation for a revised Sustainable Community Strategy, which can and was intended to form part of the LDF evidence base;

(f) accessible report summaries of consultation results should be produced at the end of each DPD stage;

(g) all communication throughout the LDF consultation should be directed through generic telephone and email contacts rather than named team members, e.g.

“Contact the Forward Planning Team on 01992 564517, email us on LDFconsult@eppingforestdc.gov.uk”;

(h) consultation questionnaires should be very carefully developed if they are to engage with the desired audience and provide meaningful feedback that can be analysed within the Council’s resources and LDF timescales. There should be a mostly quantitative, theme-based approach to questionnaire design. Questionnaire design should be engaging, accessible and user-friendly; and

(i) consideration should be given to the use of prize incentives when undertaking wide-scale public consultation through questionnaires – this may be appropriate for Core Strategy Issues and Options (complete our questionnaire, enter into prize draw). Chelmsford Borough Council found this approach helpful with their CS Issues and Options.

Preparation And Evidence Gathering (Stage One)

6. Engaging with the community in the preparation and evidence gathering stage is the first element of consultation in the production of an LDF Core Strategy. The Council’s spatial planning policies will require a robust evidence base which will include community engagement as part of the new government’s localism agenda.

7. There is a statutory requirement to engage with the community in the production of a Core Strategy Development Plan Document (DPD). PPS12 states that the evidence base should be comprised of:

- *participation – evidence of the views of the local community and others who have a stake in the future of the area; and*
- *research/fact-finding – evidence that the choices made by the plan are backed up by the background facts.*

8. The guidance also states that the need to engage with the community is proportionate to the job being undertaken by the DPD and that early and effective involvement of key stakeholders and the community should ensure that there are fewer objections or issues arising at a later stage.

Consultees

9. Government planning guidance identifies four main types of consultee groups for DPD production. The Forward Planning section already maintains an up-to-date database of relevant consultees and this will be used to form the groups set out below.

(i) **Statutory consultees** – There is a statutory requirement for the Council to consult with all bodies in this group. Consultees in this group include adjoining local authorities, English Heritage, Thames Water.

(ii) **General consultees** – The Council has statutory discretion over which general consultees it consults, although as the Core Strategy is such a significant part

of the LDF it is suggested that they are all involved. They include local voluntary bodies, religious groups, residents' associations, local businesses and action groups.

(iii) **Other interested parties** – The Council has statutory discretion over which other interested parties it consults with. This group is mostly comprised of regional/national bodies including CABE, National Trust, Friends of the Earth, etc.

(iv) **General public** – The Council has a statutory requirement to demonstrate that the 'views of the community' have formed part of the DPD evidence base.

CONSULTATION METHODS I - COMMUNITY VISIONING (FOR THE GENERAL PUBLIC)

Core Strategy Leaflet And Visioning Questionnaire

10. It is important that local residents have as clear an understanding as possible of what the LDF Core Strategy is, how it will be developed and how they can have their say. Production of an LDF involvement leaflet in plain English can clearly explain this information to the wider community. The information in the leaflet will also be available on the LDF website and at exhibitions.

11. The leaflet should be accompanied by a brief, clear and concise questionnaire to ascertain views on the key issues and a vision for the future. e.g. *Epping Forest should be a place where ...* The questionnaire should focus on providing the Council with quantitative data results as far as possible in order to make the feedback manageable and meaningful within the resources available. The questionnaire should also be made available online through the LDF website and copies made available at exhibitions and workshops.

12. It is recommended that, in order to raise awareness and give the opportunity to comment to as many people as possible, the leaflet and questionnaire are sent to each household in the district – approximately 60,000 will be required.

Community Workshops

13. A series of community workshops will be held at different locations within the district to give local residents the opportunity to identify planning issues and discuss how the District should develop in the future. The workshops will be publicised through the leaflet, website and other channels. All residents are welcome to attend, however they will be required to register as places will be limited to approximately 50-60 per event.

14. Community workshops will be held during the evening (7-9pm) to ensure that residents are more likely to be able to attend. In order to provide effective results within the timescales and resources available it is recommended that six community workshops are held within the following areas (based on the 'functional areas' identified in the Sustainability Appraisal Scoping Report, May 2010). Care will be taken to ensure that workshops do not clash with other EFDC meetings where possible.

15. The six workshop areas are (see Appendix C for map):

- Waltham Abbey & Nazeing Area;
- Rural North & Harlow;
- Central Line Settlements (north);
- Central Line Settlements (south);
- Rural South East; and
- Ongar & Rural North East.

16. Workshop discussions will allow participants to focus both on issues in their

neighbourhood and the district as a whole. It should be noted that the names of the workshop areas will be updated to make them more accessible for local residents.

Vision And Issues Postcards

17. In order to target the 'busy' hard-to-reach commuter segment of residents the LDF team will distribute quick-fire question postcards at underground and rail stations in and near the District during the morning rush hour. Participants will be requested to complete the postcard and return it to Forward Planning using freepost. They will be encouraged to do this through the use of a meal for two prize incentive.

18. The post-cards will ask the resident to write three brief statements under the heading 'Epping Forest District should be a place where ...' as well as to identify three priority planning and development issues facing the area. The intention is not to replicate the content of the main questionnaire, but to complement it, and receive views from a group of people who may otherwise not participate.

Website

19. The Council website provides space for information on the LDF. This will be updated to include some elements of the LDF branding and logo to reflect what is going on with the Community Visioning exercise. The proposed structure for the updated content is as follows:

- (a) **Home page** - LDF/CS overview text taken from CS leaflet;
- (b) **Get involved** - Information on upcoming workshops / exhibitions / visioning questionnaire and a feedback form for people to submit their details and be kept involved through an LDF contact database;
- (c) **Download** - Electronic versions of any relevant materials – e.g. reports, leaflets, exhibitions;
- (d) **Evidence base** – Plain English list of all evidence base studies with links to view the documents where appropriate;
- (e) **Timescales** - Sets out indicative timescales for the CS and LDF; and
- (f) **Contact us** - Generic links for telephone / email / address for Forward Planning team.

20. Options for the website address include www.eppingforestdc.gov.uk/LDF and www.eppingforestdc.gov.uk/planningourfuture. The website address will be advertised on Council printed materials where appropriate.

Publicity Exhibitions

21. Information about the Core Strategy and how people can have their say will be on display at several locations within the district. It is likely that three exhibition panels will be used per display and they will be accompanied by copies of the questionnaire and a questionnaire post-box where people can submit their views. Exhibitions will be unstaffed.

22. It is proposed that the exhibition is on display within each of the six district areas for a period of two weeks (see Appendix C for map) Discussions with Town and Parish Councils will take place to identify the most appropriate locations within each area.

23. The basic format for the exhibition will be:

(a) What is a Core Strategy?

(b) How can I have my say? (plus district map)

(c) [*What planning issues face the district?*] and [*What's our vision for the future?*] boxes.

Facebook (Social Media)

24. The Council's PR team has recently started to run and moderate a Facebook page. The LDF team is proposing to have a dedicated Facebook page that allows people to become 'fans' of the LDF. This is a good way to keep anyone interested immediately up-to-date with any LDF developments as news or relevant links posted by the LDF team will appear in the Facebook live-feed of anyone who has become a 'Fan'. The initial focus of the LDF Facebook page will be the launch of the Core Strategy including the LDF process/involvement information set out in the leaflet. The page can provide links to the Issues and Vision questionnaire and documents as they become available.

25. The issue of whether to allow the public to add material directly to the site is currently being discussed. The Council's PR team is of the view that Facebook should be an interactive two-way experience to allow people to contribute. As such the PR team may be able to moderate the site internally. The alternative is to disable the features that allow people to publish un-moderated content to ensure that it doesn't become a forum for negativity and offensive comments.

26. Within a more controlled approach the LDF team could add a 'send us your questions' private message facility where the team provide published answers on the Facebook page. The same could apply to images, for example if the LDF team wanted people to submit images of issues they are concerned about in the district or examples of places they would like it to be more like these could be emailed to the LDF team and displayed and credited on the Facebook page.

27. The operation of an LDF Facebook page at the start of the Core Strategy engagement process will help the Council to demonstrate another channel in which it is seeking the views of the community, particularly those of younger people who may be less likely to complete a written questionnaire or visit the Council website. It will be important to attract as many 'fans' as possible for the LDF Facebook page to ensure its credibility and as such it should be promoted in LDF literature, the Council's website and twitter service. Details of how to join should be emailed to members of the LDF database.

28. Facebook is also a good way to publicise the Community Visioning exercise as it happens. For example, the LDF team will be able to share photos and initial feedback from community workshops shortly after they happen. This is a good way of keeping the process fresh and people interested in the Core Strategy.

Text Your Views

29. In order to open up as many communication channels as possible, the LDF team is proposing to set up a 'text your views' service. This will provide local residents with the option to send a text message with what they consider to be the main issues for planning in the area or their vision for the future. Text messaging is a very easy method for people to get in touch and it is hoped it will appeal to younger people and hard-to-reach groups.

30. How does it work?

- Use SMS Short code – send text to a 5 digit number followed by ‘LDF’;
- Incoming texts are immediately forwarded to an email address;
- Can be set up to charge the participant their standard network rate (for many people this is free);
- Option to set up an auto-reply to anyone who sends a text (e.g. Many thanks for your views, The LDF team); and
- Participants required to leave their postcode in order to allow monitoring of comments.

Photography competition

31. In order to raise awareness of the Core Strategy and to encourage local people to think about planning issues it is proposed that the LDF team runs a competition requiring local residents to submit photographs under the following categories:

- (a) Things in Epping Forest I would like to see improved (issues); and
- (b) How I would like Epping Forest to look in the future (vision).

32. For the competition to be successful it will be necessary to generate a good level of publicity and to offer a prize incentive for the winning entries (e.g. meal for two at a local restaurant). The photography competition will be promoted through a series of posters displayed around the District, the LDF leaflet, website, Facebook and a press release.

Local Media Launch

33. It is considered that an LDF Core Strategy ‘launch’ will help to raise the profile of the Community Visioning exercise, increase awareness within the community and encourage local people to get involved. It is suggested that the week commencing 1 November is identified as ‘launch week’ and there are several co-ordinated activities that could take place. It will be particularly important to work closely with the Council’s PR team on this element of the Community Visioning exercise.

34. Potential elements of the launch include:

- (a) Launch event to be held in the evening at the Council offices. The event would incorporate a brief presentation about the Core Strategy and how we will be seeking to engage the community and provide information on display. It is anticipated that invitations will be sent out to the local press, media representatives and neighbouring authorities, although this will be discussed with the PR team;
- (b) Interview with local press prior to launch week to ensure there is local media coverage at the right time – potential to be more beneficial than just sending out a press release as an opportunity to engage with the local press and communicate that it is important for the Council to understand the views of local people;
- (c) Issue of a press release through the Council’s PR department;
- (d) Update of the LDF webpages with the new branding and up-to-date information on the Council’s approach to engaging with the community;
- (e) Sending out an email newsletter to inform existing email database contacts about the Core Strategy launch with a link through to information on the LDF webpages;

(f) Ensuring that all the LDF leaflet/questionnaires are sent out within a week of the launch in order to maintain momentum; and

(g) Working with PR to provide a briefing note for all members of the Forward Planning team to ensure that everyone can professionally deal with any phone calls and emails following the launch.

LDF Email Newsletter

35. It is proposed that an LDF email newsletter is developed and sent to all the email addresses that have been collected on the database to date, along with new emails collected through questionnaire feedback and publicity from the CS Community Visioning.

36. The newsletter could be sent out at key milestones to inform people of progress on the CS, opportunities to comment and locations of the exhibition and provide a link through to the LDF webpage. The content of the email could be kept simple and text based with a PDF attachment if people wish to view a more visual version. The newsletter should be sent out from LDFconsult@eppingforestdc.gov.uk.

CONSULTATION METHODS II - STATUTORY / GENERAL CONSULTEES

Formal Letter

37. A formal letter will set out the subject of the Core Strategy and invite representations on what the statutory consultees consider it should contain. The letter should suggest some key themes on which the Council is inviting comment in order to make feedback more manageable (Relevant group: statutory consultees, general consultees, other interested parties).

Stakeholder Meetings

38. It is important to undertake meaningful dialogue with key stakeholders in order to identify issues for the Core Strategy to address and to start thinking about what options may be appropriate. A programme of meetings should be developed with appropriate statutory consultees such as neighbouring planning authorities. The meetings should use a pro-forma to ensure that discussion remains focused and that there is useful output for informing the next stage of the Core Strategy (Relevant group: statutory consultees, general consultees).

Core Strategy leaflet and visioning questionnaire

39. It is important to ensure that the organisations within the general consultee group are well informed about the Core Strategy process and have the opportunity to submit their views on the vision and issues. This can be achieved through the use of the Community Visioning leaflet and questionnaire (see paragraph 11).

40. It is important to offer this group two methods of commenting as some organisations will be quite formal and expect to be treated as such, whilst others will be less so and will require a more accessible and less time-consuming approach (Relevant group: general consultees).

Stakeholder Issues Workshop

41. All general consultees (plus adjoining LPAs) should be invited to attend a Stakeholder Issues workshop. The purpose of the workshop will be to identify the key issues for the Core Strategy to address and get feedback on the development of a vision for the plan. Registration prior to the workshop will be mandatory for health and safety management and to enquire whether particular access arrangements are required (Relevant group: general consultees).

Hard-To-Reach Focus Groups

42. Engagement with these groups should be covered through the invitation to the Issues Workshop, potential stakeholder meetings and LDF summary leaflet. However, they should be contacted early in the engagement process to understand any specific requirements they may have.

43. Guidance from CLG identifies 'hard-to-reach groups' as bodies which represent the interests of the following within the local authority's area:

- Different ethnic or national groups
- Different religious groups
- Disabled people
- People carrying on business.

Timescales

44. A programme for the consultation methods outlined above can be found in Appendix A.

Evidence Base Studies

45. It is considered that involving the general public in consulting on technical evidence base studies can be counter-productive; in some cases resulting in confusion and consultation fatigue.

46. It is suggested that the approach to engagement on evidence base studies is not to contact the general public directly, rather to create awareness of and provide access to reports via the LDF webpage. This could include a few thematic questions set out on the website to encourage the general public to respond in a manageable way if they chose to do so.

47. It is suggested that local community groups (identified in Appendix A) are sent a plain English letter and summary guide explaining the study and what the Council is seeking their views on. Statutory consultees (identified in Appendix A) will receive a formal consultation letter.

Resource Implications:

An estimate for the costs of public engagement throughout the preparation of the LDF was presented to Cabinet in December 2007. It will be appropriate to reconsider this budget and the amounts that have been attributed to various functions once the proposals of the Coalition government become clear.

See Appendix B for estimated budget requirements for the Community Visioning exercise.

Legal and Governance Implications:

No relevant implications

Safer, Cleaner and Greener Implications:

Incorporation of paper-free methods to engage with local residents through the website, Facebook, text messaging and email where appropriate.

Consultation Undertaken:

No external consultation undertaken.

Background Papers:

- Planning Policy Statement 12: Local Spatial Planning (June 2008)
- Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008
- Communities and Local Government – Plan Making Manual
- EFDC Consultation Strategy – A Guide to Consultation 2006/2007

Impact Assessments:

Risk Management

Risk to the LDF not being found “sound” by the Inspector at the public examination due to insufficient consideration of the views of the local community.

Equality and Diversity:

Preparation of the Local Development Framework as a whole will be subject to an on-going Equality Impact Assessment, as part of the Sustainability Appraisal. The finalised Engagement Strategy will identify issues relating to equality and diversity in spatial planning. It will then set out methods for ensuring that these issues are considered throughout any consultation undertaken e.g. the provision of materials in a format suitable for blind or visually impaired people.

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?
None.

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?
None.