

Proposed public consultation arrangements for the Draft Local Plan

1. At the meeting of this Sub-Committee on 22nd September, some concern was expressed about the relatively low level of response to the public consultation carried out at the Issues and Options stage of the Local Plan review in autumn 2016.
2. This paper provides a recap of the consultation methods employed at the Issues and Options stage, and the outcome in terms of the number of responses received. It then sets out proposed arrangements for public consultation on the Draft Local Plan, including a wider range of venues and the use of new techniques such as StoryMaps.

Consultation at Issues and Options stage

3. Public consultation took place between 19th September and 2nd December 2016. A summary of the methods used is set out below:

Letters/emails: Over 1,350 emails and letters were sent to consultees on the planning policy database, with a separate email sent to 3,300 business occupiers. In addition letters were sent to all properties in the City which are registered as residential for council tax purposes, over 6,200 in total.

Website: The City Corporation's website contained extensive information on the consultation. A City Plan 2036 webpage was created, which included the Issues & Options document, a comment form and an online questionnaire. The consultation was also publicised on the City Corporation's Intranet pages, promoting it to all staff members.

City Libraries: During the consultation period the Issues and Options document and other supporting documents were made available at the Guildhall and the City's public libraries.

Eshot: A message publicising the consultation was issued via *eshot* (an electronic bulletin of news and current issues) to 200 business occupiers.

City Resident: An article regarding the consultation was published in the autumn 2016 issue of City Resident.

Business Representation Groups: Direct contact was made with specific business groups and interests to alert them to the consultation and it was requested that consultation notifications were circulated to their members. This included the City Property Association, Cheapside BID, Aldgate Partnership, Inner and Middle Temple Associations. These groups were offered the option of a direct presentation and workshop from City officers, but no group took up the offer.

Public Consultation Events: Two events were held at the City Centre on 3rd and 13th October 2016, to help publicise the consultation. These events were open to the public and involved a presentation, question and answer session

and information displays. The first event took place in the late afternoon/early evening, while the second was held as a breakfast/morning meeting to potentially reach different audiences. Information about these events was published on the website, through social media and direct email/letter contact with consultees.

Member Notification: Direct notification of the consultation was sent to all Common Council Members by letter and email and an article appeared in the September 2016 Members' Briefing. An additional briefing meeting for Members was held in October 2016.

News coverage: A press release was published which gained wide publicity in the local, professional planning and property press. City Matters featured the consultation on the front page of their maiden edition. There were also pieces in Planning Magazine and Property Week.

Facebook: A post regarding the consultation was made to the "City of London Corporation: City View" Facebook account on 20th September 2016. The account is "Liked" or "Followed" by around 13,000 different Facebook users.

Twitter: Posts were made about the consultation on the 19th September and 26th October from the @squarehighways Twitter account, which has around 3,000 followers. Posts regarding the consultation were also made from third party Twitter accounts, such as @tfltp, a TFL account about Taxis and Private Hire vehicles, which has over 11,000 followers and @PWnews, the Property Week account, which has over 60,000 followers.

Leaflets: A leaflet was produced to publicise the consultation. 1,500 copies of the leaflet were printed and distributed around the City. These were placed in key locations to target workers, residents and visitors. These included housing estate offices, libraries, churches, office foyers, and medical buildings.

Meetings: Presentations were made at a range of City Corporation meetings that have an interest in aspects of the Local Plan, including the Department of the Built Environment Users' Panel, the Conservation Area Advisory Committee and the City of London Access Group.

4. A total of 911 separate comments in response to the Issues and Options consultation were received from 65 individuals and organisations. Broadly speaking around a third of respondents were individuals; a third were statutory agencies or local authorities; and a third were businesses, landowners or amenity groups.
5. Given the extensive publicity undertaken, the number of comments received was disappointing, albeit very similar to the level of response at the same stage of the previous City Local Plan. Officers have been advised by their counterparts in neighbouring boroughs that the response to their Local Plan consultations has generally been of a similar or only slightly higher level. Where boroughs have received large numbers of consultation responses, this

has normally been in response to specific site allocations, such as major housing sites.

Proposed public consultation on the Draft Local Plan

6. Regulations require that public consultation on the Draft Local Plan should run for a statutory minimum period of six weeks, although a longer period of at least 8 weeks is proposed. Members are asked to indicate whether an extended consultation of up to 12 weeks should be used to maximise publicity and public response. It is currently envisaged that consultation will take place in March/April 2018, although this will depend upon progress in agreeing policies through the Sub-Committee and Grand Committee process, as set out in Appendix 2 to this report.
7. Although most of the methods used in the last consultation exercise remain valid, officers have identified a number of additional consultation methods and improvements that could be made. In taking forward the consultation, officers will work closely with colleagues within Built Environment who have detailed experience of consultation, particularly on transportation and public realm schemes. Officers will also liaise closely with the Corporate Public Relations Office and make use of the expertise and experience within the PRO.

Presentation of information

8. The Local Plan will inevitably be a large document because of the range of issues that it needs to cover, and written in technical/legalistic language given the way that it is used, but it is important to make it visually engaging and as easy to read as possible in order to reach a wide audience. It is proposed to make the Local Plan more interesting to different audiences through greater use of summary documents and leaflets with greater use of illustrations, photographs and infographics for people who do not have time to read the full document.
9. A technique that we propose to use for the Draft Local Plan is Story Maps. These are web-based applications that combine maps with text, images, videos and other multimedia sources. They are designed to be attractive and usable by anyone, making them ideal for engagement and publicity. StoryMaps would be a particularly useful way of illustrating the potential effect of different policy options, such as the evolving Eastern City Cluster of tall buildings. To date only a handful of local authorities have used StoryMaps for planning purposes, so this would be an innovative consultation tool.
10. At the Issues and Options stage, only a small proportion of the people who visited the City Plan 2036 webpage actually completed the online questionnaire, so we will seek to ensure that the supporting material is as accessible and simple to complete as possible. Questionnaires and comments forms will be used to assist respondents, but it will also be made clear that comments can be provided in other ways, including through email, response to social media feeds, letter, consultation events etc.

Event locations

11. At the previous stage, consultation workshops were held at the City Centre. While the City Centre or the Guildhall complex would be a suitable location for a launch event, it is felt that we are likely to reach a wider cross-section of City workers, residents and visitors by visiting different locations across the City and by holding more informal events.
12. Subject to obtaining the necessary consents, it is proposed to run a series of drop-in sessions at venues such as Leadenhall Market, One New Change and The Barbican Centre, targeting lunchtimes in particular and other busy times as appropriate to the venue. It is also proposed to approach the organisers of existing planned events during the consultation period to see if they would be willing to accommodate a display in relation to the Local Plan.
13. In addition, it is intended to directly contact a range of organisations, such as residents associations and business groups, in advance of the start of the consultation period to offer specific meetings or presentations on the Local Plan. Officers have already been invited for example to present the Local Plan at a breakfast seminar held by the City Property Association.
14. Depending on precise timing, there may be opportunities for shared engagement with the Strategic Transportation team on the early stages of the emerging Transport Strategy, and potentially with other relevant City Corporation services.

Engagement with City workers

15. Past experience has shown that City workers have tended not to actively engage in planning policy consultations, and the business view has tended to be represented by the development industry rather than companies based in the City or their employees.
16. In order to gather a range of views from the City's business community, a broad selection of City occupiers were approached during summer 2017, with 24 individuals from 22 firms responding. An initial focus-group style meeting was held on 1st September, resulting in a very useful dialogue between officers and business representatives.
17. Although a number of the business contacts were unable to attend this first meeting, they indicated that they would like to participate in further meetings and/or contribute to ongoing consultation on relevant issues in the Local Plan through on-line consultation.
18. It is proposed to arrange further meetings with this group during the consultation period, and in advance of that to directly approach another selection of City occupiers to see if additional business contacts can be added to the group.

Summary of proposals

19. In summary, it is proposed to undertake the following consultation methods at the Draft Plan stage:
- Direct notifications by letter or email to all consultees on the planning policy database, plus the business occupiers' database. Those City residents who asked to be kept informed of progress on the Local Plan at the Issues & Options stage will also be notified;
 - Consultation web page with a range of information and online questionnaires, designed to be easy to complete as possible;
 - Use of StoryMaps on the website to illustrate the main Local Plan proposals and enable a more interactive form of participation;
 - Use of social media channels, with repeated reminders of upcoming consultation events;
 - An official launch event at The Guildhall or City Centre with the aim of generating widespread publicity. Invitations would be sent to key stakeholders, with additional publicity through a press release, social media and the City Corporation's website;
 - A briefing for Members with the intention of using Members' networks of contacts within their wards to help raise awareness of the Local Plan;
 - A series of drop-in events at different locations across the City, targeting lunchtimes and other busy times as appropriate to the venue;
 - Attendance at other events during the consultation period, subject to the agreement of the event organisers;
 - Direct contact with a range of organisations to offer tailored presentations or briefing sessions relating to their areas of interest;
 - Articles in City Corporation printed and electronic publications, and press releases to a range of media outlets;
 - Ongoing engagement with an interested group of City workers, including focus-group style meetings;
 - Widespread distribution of leaflets at key locations around the City; and
 - Deposit of documents and supporting material at City libraries.
20. Members are asked to agree the proposed arrangements, and to suggest other potential consultation methods to increase local interest in the draft Plan.

Consultation Budget

21. There is no specific budget for consultation on the Local Plan and the activities summarised above will need to be funded through the existing Local Risk budget for the Planning Policy section. Many of the proposed consultation methods can be delivered principally through officer time and resource, but there will be a cost in producing printed materials for distribution. If the Sub-Committee would like additional public consultation methods to be considered these are likely to generate a need for additional funding.