



HEADINGLEY **NEIGHBOURHOODPLAN**

Pre-Submission Consultation Engagement Strategy

Final Version June 2020

Headingley NP – Regulation 14 (Pre-Submission) Consultation

Engagement Strategy

1. Introduction / Purpose

We have reached the pre-submission consultation stage and this document sets out the strategy for carrying out the statutory consultation in line with the regulatory requirements set out in Regulation 14 and in keeping with best practice. This engagement strategy will be used as a reference point and guide before, during and after the pre-submission period to help plan, monitor and evaluate the success of the consultation. It will also be used as part of the evidence base supporting the consultation statement when the plan is submitted for independent examination in late 2020 / early 2021.

In light of the circumstances surrounding the outbreak of Covid-19 and resultant ‘lockdown’ and social distancing measures introduced by government, we have been required to reconsider the overall approach to the pre-submission consultation and make changes as necessary. It is important for this engagement strategy to set out clearly the measures that we will take to ensure that residents, businesses and stakeholders have a good opportunity to respond to the consultation and contribute to the preparation of the Headingley Neighbourhood Plan. This will be critical to ensuring that the plan is successful at independent examination and the subsequent referendum.

This engagement strategy will be shared with Leeds City Council for their comment and agreement in advance of the pre-submission consultation. It is anticipated that the consultation period can commence in early June 2020.

2. Consultation History

We have a good track record in engaging with local residents and stakeholders. The plan was initiated by a meeting of local residents groups in 2014 along with businesses and anchor organisations such as the universities and representatives from the stadium. A questionnaire and public meetings were used to gather initial ideas for inclusion in the plan. In early 2015, over 5000 homes were leafleted, online consultation took place, and public drop in meetings were held.

In 2017, following a period of reflection, it was decided that the overall focus of the plan would need to change to account for changing circumstances in the neighbourhood area, particularly demographic changes and the local impact of Leeds City Council’s Article 4 direction. The Forum then decided to refresh the consultation to take account of the change in direction, and to re-engage with stakeholders in the area on that basis. Targeted consultation took place with the Stadium, landlords, places of worship, sheltered and specialist housing providers, schools and nurseries. A re-launch event was held and attended by over 50 local residents. This was to ensure that their views and forward plans could be taken into account in the new draft plan.

As a result of the consultation that’s been conducted to prepare the pre-submission draft plan, we are in a good position to make the most of the pre-submission consultation and ensure that all sections of the community are given the opportunity to comment. The consultation will rely on the positive working relationships that the Forum has built with key stakeholders and groups, which will help to make the neighbourhood plan representative when it is submitted for independent examination.

3. Planning Guidance

Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 set out the process by which pre-submission consultation must be carried out. The requirements of the regulations must be met for the neighbourhood plan to be successful at examination and proceed to referendum.

The requirements are as follows:

14. Before submitting a plan proposal to the local planning authority, a qualifying body must—

(a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area—

(i) details of the proposals for a neighbourhood development plan;

(ii) details of where and when the proposals for a neighbourhood development plan may be inspected;

(iii) details of how to make representations; and

(iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;

(b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and

(c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.

Initial government guidance on how neighbourhood planning groups should respond to the Covid-19 crisis was unclear, particularly in regard to whether statutory consultations could proceed and if so, how they could be conducted safely and in line with legal requirements. However, on 13 May 2020, Planning Practice Guidance was updated to clarify the position. Paragraph 107 (Ref ID: 41-107-20200513) now states:

Public consultation: *The Neighbourhood Planning (General) Regulations 2012 require neighbourhood planning groups and local planning authorities to undertake publicity in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area at particular stages of the process. It is not mandatory that engagement is undertaken using face-to-face methods. However, to demonstrate that all groups in the community have been sufficiently engaged, such as with those without internet access, more targeted methods may be needed including by telephone or in writing. Local planning authorities may be able to advise neighbourhood planning groups on suitable methods and how to reach certain groups in the community.*

There are also requirements in the Neighbourhood Planning (General) Regulations 2012 that require at some stages of the process for neighbourhood planning groups and local planning authorities to publicise the neighbourhood planning proposal and publish details of where and when documents can be inspected. It is not mandatory for copies of documents to be made available at a physical location. They may be held available online. Local planning authorities may be able to advise neighbourhood planning groups on suitable methods that will provide communities with access to physical copies of documents.

The changes to Planning Practice Guidance make it clear that conducting the pre-submission consultation is possible, indeed encouraged, and that regulatory requirements can be met without having physical copies of the plan available in public locations.

This engagement strategy will set out how we intend to conduct the pre-submission consultation in line with PPG, which should give confidence to Leeds City Council and the independent examiner once the neighbourhood plan has been submitted for independent examination. The measures set out below are proportionate to the neighbourhood area and reflect the different groups in Headingley and the overall aims and objectives of the consultation.

4. Analysis

Reflecting on the PPG update, the following sections will set out how the Forum intends to approach the pre-submission consultation.

a. Opportunities

There are a number of opportunities for us to utilise the relationships built up during previous consultations and with informal and formal networks in Headingley.

i. Targeting

Targeting of key groups can take place in Headingley as part of the consultation and this will build on the targeting that took place during the informal consultation conducted after it was decided to refresh the approach of the plan in 2017. Key groups and contacts to target as part of the consultation are set out below.

ii. Online consultation

It is expected that the pre-submission consultation will be based mainly online, whilst not excluding those without internet access, those with limited internet accessibility or those that aren't used to working and commenting online. There are a number of social media pages, websites, and mailing lists in Headingley that can be used to promote the plan and encourage responses to the consultation.

iii. Networks

Headingley is known for having active and engaged residents, as well as for having a large student population. Informal networks of residents, landlords, and businesses in the area can be used to promote the plan and raise awareness about the consultation. The student population can also be targeted using social media and contacts at the universities and students unions.

b. Constraints

Whilst there are a number of opportunities for the upcoming consultation, we also acknowledge that there are constraints which need to be addressed to ensure that the consultation is effective and robust.

i. Social distancing

Social distancing measures and the closure of public buildings mean that it is not possible to host a public meeting or a drop in session (as would normally be the case as part of any of our consultations). It is also not possible during this period to host copies of the plan at the library or another community building as they are currently closed. However, we recognise that person-to-person discussion is a valuable part of a consultation process, and will seek to

provide an alternative solution, for example the opportunity to discuss the plan with a member of the steering group by phone or video call.

ii. Internet accessibility

People who are not able to access the internet or who are not confident in making comments online will still have an opportunity to read the plan and make a contribution to the consultation. We will ensure that no groups are excluded from the consultation process by leafleting every household and placing posters up in the neighbourhood area. We will also contact representatives from key groups in the community which represent the views of people who are more likely not to have access to the internet, for example the local Neighbourhood Network.

5. Stakeholder Groups

The following key stakeholder groups have been identified based on local knowledge and previous consultation experience:

- Residents associations and groups: Ash Road Area RA (ARARA), Beckett Park RA, Cardigan Triangle CA, North Hyde Park NA, Turnways RA. Each have their own mailing lists and we have contacts in each group.
- Residents (generally): All households will be leafleted about the consultation.
- Headingley Network and Headingley Development Trust: we have contacts in these groups and will ask that consultation material is circulated.
- Landlords: We have contacts in several landlords groups in the area who will be contacted directly about the consultation and asked to circulate the consultation material among their networks.
- Local businesses: we have a list of businesses and they will be leafleted and contacted directly by email (where possible).
- Universities: We have contacts at the universities and they will be contacted directly about the consultation.
- Students Unions: We have contacts at students unions and they will be asked to circulate consultation material.
- Headingley Stadium: We have a contact at the stadium and they will be contacted directly about the consultation.
- Places of worship: We have contacts at local places of worship and they will be contacted directly about the consultation and asked to circulate material amongst their networks.
- Schools and nurseries: We have contacts at schools and nurseries and they will be contacted directly about the consultation and asked to circulate material to parents.
- Ward Councillors: Ward councillors have good networks in Headingley and will be asked to circulate consultation material. The neighbourhood area crosses the boundary of 4 Leeds City Council wards (Headingley and Hyde Park, Kirkstall Weetwood and Chapel Allerton) and the ward members will be contacted as part of the consultation.
- Neighbouring neighbourhood planning areas: Hyde Park, Little Woodhouse, Kirkstall are designated neighbourhood planning areas and will be contacted directly about the neighbourhood plan and asked to circulate the consultation material amongst their networks given the proximity of the neighbourhood areas. Chapel Allerton, Chapeltown and Meanwood Neighbourhood Areas have not yet been designated but they will be contacted directly about the consultation.
- OWLS – Local Neighbourhood Network for older people

- **Statutory Consultees:** The Forum is required to contact a number of statutory consultees, the full list of these is set out at Appendix 1

6. Strategy

The consultation period must be a minimum of 6 weeks, however given the circumstances, it has been agreed that the pre-submission consultation will last for a period of twelve weeks, between 16 June and 8 September. The following section sets out the different consultation methods that will be used during the consultation.

a. Consultation method 1 – making the plan available online

The neighbourhood plan and supporting material will be made available on the Headingley Neighbourhood Forum website: <https://headingleyneighbourhoodplan.org.uk/>. The consultation material will also be made available on Leeds City Council's website: <https://www.leeds.gov.uk/planning/planning-policy/neighbourhood-planning/headingley-neighbourhood-plan>.

b. Consultation method 2 – mailing lists

The Forum has a mailing list of contacts and material will be circulated to contacts on the list. The Forum will also ask the residents groups (approx. 100 members), Headingley Network (10 members) and Headingley Development Trust (1200 members) to circulate the consultation material to their mailing lists.

c. Consultation method 3 – online targeting

There are a number of local social media pages in the neighbourhood area, the Forum will prepare a schedule of social media posts for before and during the consultation for these pages to encourage participation in the consultation.

- Headingley and Hyde Park News: <https://www.facebook.com/HeadingleyCouncillors/>
- Headingley Neighbourhood Forum twitter: <https://twitter.com/headingleyplan?lang=en>
- Headingley Development Trust Facebook: <https://en-gb.facebook.com/pg/headingleyno1/posts/>
- Headingley Today Facebook: <https://en-gb.facebook.com/pages/category/Company/Headingley-Today-106951619704/>
- Headingley Community Hub Facebook: <https://en-gb.facebook.com/pages/category/Local-Service/Headingley-Community-Hub-1053266538166466/>

d. Consultation method 4 – mail out

Every household in the neighbourhood area will receive a leaflet about the consultation setting out how and where to read the plan and supporting material and how to make comments. A proof of this is available at appendix 2.

e. Consultation method 5 – posters

Posters will be prepared and placed around the neighbourhood area, particularly along key pedestrian routes, giving details of the consultation, how to view the plan and supporting material and how to make comments.

f. Consultation method 6 – local news

We will prepare a series of 'press releases' for local press outlets such as North Leeds Life and the Yorkshire Evening Post. North Leeds Life will be contacted about publicising the plan on social media and on their website: <https://www.northleedslifegroup.com/> and there may also be an opportunity to use a 'Ward Member' column to promote the consultation.

Headingley has its own website, and the hosts will be contacted to circulate the consultation material amongst their contacts and to put a post on the website: <https://www.headingleyleeds.com/>

g. Consultation method 7 – physical copies of the plan

Physical copies of the plan will be held by the steering group and the Council and made available on request (via phone or email to either the LCC neighbourhood planning team or the Steering Group).

A 'plain text' accessible version of the plan is being prepared and will also be available as a printed copy.

h. Consultation method 8 – online 'drop ins'

The steering group will host a virtual drop in event on Google Hangout – where residents can read the plan in advance and ask questions directly to steering group members. The proposed date for this is August 9th 2020.

i. Consultation method 9 – phone discussions

Residents and other stakeholders can discuss the plan over the phone with a member of the steering group or with the Council's neighbourhood planning officer (by phoning or emailing the LCC neighbourhood planning team to agree a time/date). NP Support phone number: 0113 37 87997, email: npsupport@leeds.gov.uk .

j. Consultation method 10 – statutory consultees

The Forum will contact statutory consultees directly by email (or letter where email is not possible) to provide details of the consultation and include a copy of the plan, in line with regulatory requirements.

The above information will be available in publicity material so that the different consultation methods are clear to residents and other stakeholders.

7. Feedback methods:

Based on the consultation methods set out above, there are a number of ways that consultees can give feedback on the plan:

- By email to the Forum at: info@headingleyneighbourhoodplan.org.uk or to the LCC neighbourhood planning team at npsupport@leeds.gov.uk
- A pro-forma has been prepared to assist with submitting comments.
- By phone at: 0113 37 87997.
- Feedback at webinars/online events will be summarised by the Steering Group and agreed with participants

- Comments on social media will be summarised by the Steering Group and screenshots captured as part of the evidence base for the plan.

The feedback will be collated and a summary written and published on the Headingley Neighbourhood Plan website. This will be made available before the neighbourhood plan is submitted.

Feedback will be captured in line with GDPR obligations and consultees will need to give their express consent for their feedback to be included as part of the consultation statement evidence.

Should lockdown / social distancing measures be significantly relaxed, the Forum will consider the option to hold a public meeting or exhibition on the submission draft plan before it is submitted for independent examination.

8. Evaluation

This engagement strategy will be used to monitor how well the consultation is going during the consultation period and identify any gaps. After 6 weeks, the consultation will be reviewed and additional measures introduced to boost engagement as necessary and appropriate.

9. Timeline

Weeks 1+2

- Statutory consultees will be notified of the consultation
- The plan and supporting documents will be available online
- Leaflets will be delivered to every household in the neighbourhood area
- Press releases will be given to local news outlets
- Social media posts will be made to raise awareness about the plan

Weeks 3+4

- Social media posts
- Posters placed around neighbourhood area (if not possible in weeks 1 and 2)

Weeks 5+6

- Social media posts
- Press release 2
- Steering Group review of how effective the engagement and consultation has been to date and adjustments made to engagement strategy as appropriate

Weeks 7+8

- 'Drop in' event (Google Hangout or Zoom)

Weeks 9+10

- Social media 'final reminder'
- 'Last chance' to submit comments

Weeks 11+12

- Collating responses
- Close of consultation

Appendix 1 – List of Statutory Consultees

Neighbourhood Planning Consultation Bodies

1. For the purposes of regulations 14 and 16, a “consultation body” means—
 - (a) where the local planning authority is a London borough council, the Mayor of London;
 - (b) a local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;

Neighbouring Local Authorities

- West Yorkshire Combined Authority
- Bradford Council
- North Yorkshire County Council
- Craven Council
- Wakefield Council
- Harrogate Council
- Kirklees Council
- Calderdale Council
- Selby Council
- York Council
- Barnsley Council

Neighbouring Neighbourhood Forums

- Kirkstall Neighbourhood Forum
- Hyde Park Neighbourhood Forum
- Little Woodhouse Neighbourhood Forum
- Chapel Allerton Interim Neighbourhood Forum
- Chapeltown Interim Neighbourhood Forum
- Meanwood Valley Partnership

Statutory Consultees

the Coal Authority(1);

the Homes and Communities Agency(2);

Natural England(3);

the Environment Agency(4);

the Historic Buildings and Monuments Commission for England (known as English Heritage)(5);

Network Rail Infrastructure Limited (company number 2904587);

- (i)the Highways Agency;
- (j)the Marine Management Organisation
- (k)any person—
 - (i)to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003; and
 - (ii)who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority;
 - (l)where it exercises functions in any part of the neighbourhood area—
 - (i)a Primary Care Trust established under section 18 of the National Health Service Act 2006(7) or continued in existence by virtue of that section;
 - (ii)a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989
 - (iii)a person to whom a licence has been granted under section 7(2) of the Gas Act 1986
 - (iv)a sewerage undertaker; and
 - (v)a water undertaker;
 - (m)voluntary bodies some or all of whose activities benefit all or any part of the neighbourhood area;
 - (n)bodies which represent the interests of different racial, ethnic or national groups in the neighbourhood area;
 - (o)bodies which represent the interests of different religious groups in the neighbourhood area;
 - (p)bodies which represent the interests of persons carrying on business in the neighbourhood area; and
 - (q)bodies which represent the interests of disabled persons in the neighbourhood area.

Additional:

Appendix 2 – Proof of Pre-Submission Consultation Leaflet

Appendix 3 – Proof of Pre-Submission Posters