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**Pre-Submission Consultation Engagement Strategy**

**DRAFT V3 October 2020**

# **GARFORTH NP – Regulation 14 (Pre-Submission) Consultation**

## **Engagement Strategy**

### **1. Introduction**

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. The 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 part of the evidence base supporting the consultation statement when the plan is submitted for independent examination in 2021.

As a result of Covid-19, the resultant ‘lockdown’ and social distancing, Garforth Neighbourhood Planning Forum have reconsidered the overall approach to the pre-submission consultation and made changes as necessary. This engagement strategy sets out clearly the measures that we will take to ensure that residents, businesses and stakeholders have an opportunity to respond to the consultation and continue to contribute to the preparation of the Garforth Neighbourhood Plan. This will be critical to ensuring that the plan is successful at independent examination and referendum.

This engagement strategy will be submitted to Leeds City Council for their comment and agreement in advance of the pre-submission consultation. It is anticipated that the consultation period will commence in 2021.

### **2. Consultation History**

Garforth Neighbourhood Planning Forum was designated on 17th November 2014 and has a great record of engaging with local residents and stakeholders over the last 6 years including:

* Public meetings and Drop-Ins at the Miners Welfare Hall, Garforth Academy, The Gaping Goose public house and Garforth Workingmen’s Club
* “Meet the public” stands on Garforth Main Street, outside Tesco supermarket and at the annual Garforth Galas
* Mail drops to all 7,000 households in Garforth
* Multiple surveys and questionnaires for the residents, the retail business owners, industrial business owners, local clubs and societies, local doctors and dentists and local estate agents
* We have met with and interviewed NHS providers, the local schools’ Trust, the local flood group, HS2, ecology groups, local developers and landowners
* Our ward councillors have been invited to our steering group meetings on many occasions and we have also met with our local MP on several occasions.
* Meetings with representatives of all our neighbouring parishes

As a result of the extensive consultation that has been conducted to prepare the pre-submission draft plan, we are well placed to 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 sets 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:

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

1. 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—
   1. details of the proposals for a neighbourhood development plan;
   2. details of where and when the proposals for a neighbourhood development plan may be inspected;
   3. details of how to make representations; and
   4. 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;
2. 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
3. send a copy of the proposals for a neighbourhood development plan to the local planning authority.

On 13th May 2020, Planning Practice Guidance was updated to clarify the position with regard to REG 14 during the COVID pandemic. 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 Garforth and the overall aims and objectives of the consultation.

### **4. Rationale for methodology**

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 Garforth.

1. Targeting - Targeting of key groups and networks will take place in Garforth as part of the consultation.
2. 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 are not used to working and commenting online. In addition to our own sites there are a number of social media pages, websites, and mailing lists in Garforth that can be used to promote the plan and encourage responses to the consultation.

#### b. Constraints

1. 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 a consultations). It may also not be possible during this period to host copies of the plan at the library or another community building as they may close. However, we recognise that person-to-person discussion is a valuable part of a consultation process, and will seek to provide alternative solutions, for example the opportunity to discuss the plan with a member of the steering group by phone or video call.
2. 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 Elders Team.

### **5. Stakeholder Groups**

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

1. Residents: All households will be leafleted about the consultation.
2. GNPF members: All members will be contacted, either by email or telephone about the consultation
3. Local businesses: we have lists of retail and industrial businesses and they will be leafletted and contacted directly by email (where possible).
4. Places of worship: they will be contacted directly about the consultation and asked to circulate material amongst their networks
5. Schools and nurseries:
6. Ward Councillors: including neighbouring Wards
7. Neighbouring parishes (neighbourhood planning areas):
8. NET– Local Neighbourhood Elders Team for older people
9. Clubs and Societies: we have a list of most of the clubs and societies in the Garforth area
10. 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. Consultation Strategy**

The consultation period must be a minimum of 6 weeks, we will plan for an 8 week consultation.

The following paragraphs sets out the different consultation methods that will be used during the consultation.

#### **Making the plan available online** - the neighbourhood plan and supporting material will be made available on the Garforth Neighbourhood Forum website www.garforthplan.co.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/garforth-neighbourhood-plan.

#### **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 on the GNPF website.

#### **Mail out** - Every household, business, club and society, school, church, councillor, neighbouring parish 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. Each household will also receive a brief summary of the Plan, proof available at appendix 3

1. **Mailing lists** - The Forum has a mailing list of contacts and material will be circulated to contacts on the list.
2. **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. Proof available at appendix 4
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.
4. **Local news** - We will prepare a series of ‘press releases’ for local press outlets
5. **Online ‘drop ins’** - The Steering Group will be hosting virtual drop in events on Zoom or Google Hangout – where residents can read the plan in advance and ask questions directly to steering group members.
6. **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). LCC NP Support phone number: 0113 37 87260, email: npsupport@leeds.gov.uk .
7. **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: garforthplan@gmail.com or to the LCC neighbourhood planning team at npsupport@leeds.gov.uk
* Via feedback form on the GNPF website. A comments form has been prepared to assist with submitting comments.
* By phone at:
* In writing to the GNPF secretary or Leeds City Council
* Feedback at webinars/online events will be summarised by the Steering Group and agreed with participants
* Via GNPF facebook site. 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 Garforth 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. Timeline**

This engagement strategy will be used to monitor how well the consultation is going during the consultation period. If necessary, the strategy will be tweaked in order to boost engagement as necessary and appropriate.

Weeks 1-4

* Statutory consultees will be notified of the consultation
* The plan and supporting documents will be available online
* Leaflets will be delivered to every household, business, church, school, social group 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
* Posters placed around neighbourhood area

Week 5

* 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

Week 6

* ‘Drop in’ event (Google Hangout or Zoom)

Week 7-8

* Remedial actions if required
* Social media ‘final reminder’
* ‘Last chance’ to submit comments

End of Week 8

* Close of consultation

# **Appendices**

1. Appendix 1 – List of Statutory Consultees
2. Appendix 2 – Proof of Pre-Submission Consultation Leaflet
3. Appendix 3 – Proof of Summary of Plan
4. Appendix 4 – Proof of Pre-Submission Posters

Appendix 1 – List of Statutory Consultees

Neighbourhood Planning Consultation Bodies

Local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;

[liz.hunter@westyorks-ca.gov.uk](mailto:liz.hunter@westyorks-ca.gov.uk)

[ldf.consultation@bradford.gov.uk](mailto:ldf.consultation@bradford.gov.uk)

[Policy.development@northyorks.gov.uk](mailto:Policy.development@northyorks.gov.uk)

[localplan@cravendc.gov.uk](mailto:localplan@cravendc.gov.uk)

[wdlp@wakefield.gov.uk](mailto:wdlp@wakefield.gov.uk)

[dmst@harrogate.gov.uk](mailto:dmst@harrogate.gov.uk)

[local.development@kirklees.gov.uk](mailto:local.development@kirklees.gov.uk)

[spatial.planning@calderdale.gov.uk](mailto:spatial.planning@calderdale.gov.uk)

[ldf@selby.gov.uk](mailto:ldf@selby.gov.uk)

[localplan@york.gov.uk](mailto:localplan@york.gov.uk)

[communications@barnsley.gov.uk](mailto:communications@barnsley.gov.uk)

[developmentmanagement@barnsley.gov.uk](mailto:developmentmanagement@barnsley.gov.uk)

Neighbouring Neighbourhood Planning groups and Parish Councils

Aberford [clerk@aberford-pc.gov.uk](mailto:clerk@aberford-pc.gov.uk)

Micklefield [clerk@micklefield-pc.gov.uk](mailto:clerk@micklefield-pc.gov.uk)

Ledston [dufflecoat@talktalk.net](mailto:dufflecoat@talktalk.net)

Ledsham [clerk@ledshamparishcouncil.gov.uk](mailto:clerk@ledshamparishcouncil.gov.uk)

Kippax [clerk@kippax-pc.gov.uk](mailto:clerk@kippax-pc.gov.uk)

Swillington [clerk@swillingtonvillagecouncil.gov.uk](mailto:clerk@swillingtonvillagecouncil.gov.uk)

Great and Little Preston [s.bath@greatandlittlepreston-pc.org.uk](mailto:s.bath@greatandlittlepreston-pc.org.uk)

Barwick and Scholes [clerkLS154@btinternet.com](mailto:clerkLS154@btinternet.com)

the Coal Authority(1); [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk)

Homes and Communities Agency(2); [enquiries@homesengland.gov.uk](mailto:enquiries@homesengland.gov.uk)

Natural England(3); [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)

the Environment Agency(4); [sp-yorkshire@environment-agency.gov.uk](mailto:sp-yorkshire@environment-agency.gov.uk)

English Heritage(5); [yorkshire@HistoricEngland.org.uk](mailto:yorkshire@HistoricEngland.org.uk)

Network Rail Infrastructure Limited (company number 2904587); Network Rail: 1 Eversholt Street, London, NW1 2DN [Tony.RIVERO3@networkrail.co.uk](mailto:Tony.RIVERO3@networkrail.co.uk)'

the Highways Agency; [simon.jones@highwaysengland.co.uk](mailto:simon.jones@highwaysengland.co.uk)

Marine Management Organisation; [consultations.mmo@marinemanagement.org.uk](mailto:consultations.mmo@marinemanagement.org.uk)

[consultations@marinemanagement.org.uk](mailto:consultations@marinemanagement.org.uk)

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;

[nnhc@openreach.co.uk](mailto:nnhc@openreach.co.uk)

[localgovtconsult@ctil.co.uk](mailto:localgovtconsult@ctil.co.uk)

[contactus@kcom.com](mailto:contactus@kcom.com)

[support@tescomobile.com](mailto:support@tescomobile.com)

[customerrelations@ee.co.uk](mailto:customerrelations@ee.co.uk)

[techsupport@three.co.uk](mailto:techsupport@three.co.uk)

[emf.advisoryunit@vodafone.co.uk](mailto:emf.advisoryunit@vodafone.co.uk)

O2 Correspondence Team

PO BOX 694, Winchester, SO23 5AP

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; [communications.lth@nhs.net](mailto:communications.lth@nhs.net)

(ii)a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989(8); [nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)

(iii)a person to whom a licence has been granted under section 7(2) of the Gas Act 1986(9);

[stakeholder@northerngas.co.uk](mailto:stakeholder@northerngas.co.uk)

(iv)a sewerage undertaker; [technical.sewerage@yorkshirewater.co.uk](mailto:technical.sewerage@yorkshirewater.co.uk)

(v)a water undertaker; [wbu.service.centre@yorkshirewater.co.uk](mailto:wbu.service.centre@yorkshirewater.co.uk)

Voluntary bodies some or all of whose activities benefit all or any part of the neighbourhood area;

[office@leedsadvocacy.org.uk](mailto:office@leedsadvocacy.org.uk)

[info@leedsinvolvement.org.uk](mailto:info@leedsinvolvement.org.uk)

[info@val.org.uk](mailto:info@val.org.uk)

Bodies which represent the interests of different racial, ethnic or national groups in the neighbourhood area;

[info@leedsgate.co.uk](mailto:info@leedsgate.co.uk)

Bodies which represent the interests of different religious groups in the neighbourhood area;

[enquiries@leeds.anglican.org](mailto:enquiries@leeds.anglican.org)

[kelly.bouckley@dioceseofleeds.org.uk](mailto:kelly.bouckley@dioceseofleeds.org.uk)

Bodies which represent the interests of persons carrying on business in the neighbourhood area; and

[info@wnychamber.co.uk](mailto:info@wnychamber.co.uk)

Garforth Traders Association [alcorry@aol.com](mailto:alcorry@aol.com)

Bodies which represent the interests of disabled persons in the neighbourhood area.

[policy@ageuk.org.uk](mailto:policy@ageuk.org.uk)

[lslis@leedssocietyfordeafandblind.org.uk](mailto:lslis@leedssocietyfordeafandblind.org.uk)

[info@opforum.org.uk](mailto:info@opforum.org.uk)

[jackie.snape@da-y.org.uk](mailto:jackie.snape@da-y.org.uk)

Additional:

[Planning.north@sportengland.org](mailto:Planning.north@sportengland.org)

[planning@theatrestrust.org.uk](mailto:planning@theatrestrust.org.uk)

[info@ywt.org.uk](mailto:info@ywt.org.uk)

[yorkshirenortheast@forestry.gsi.gov.uk](mailto:yorkshirenortheast@forestry.gsi.gov.uk)

[secretary@yorkshiregardenstrust.org.uk](mailto:secretary@yorkshiregardenstrust.org.uk)

[north@cla.org.uk](mailto:north@cla.org.uk)

[smarterchoices@sustrans.org.uk](mailto:smarterchoices@sustrans.org.uk)

[Robert.Masheder@wyjs.org.uk](mailto:Robert.Masheder@wyjs.org.uk)

[mjwleeds@outlook.com](mailto:mjwleeds@outlook.com)

[office@leedscivictrust.org.uk](mailto:office@leedscivictrust.org.uk)

[office@ancientmonumentssociety.org.uk](mailto:office@ancientmonumentssociety.org.uk)

[eplanning@c20society.org.uk](mailto:eplanning@c20society.org.uk)

[PaulJarczewski@woodlandtrust.org.uk](mailto:PaulJarczewski@woodlandtrust.org.uk)

Appendix 2 – Proof of Pre-Submission Consultation Leaflet

A screenshot of a cell phone

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Appendix 3 – Proof of Summary of Plan

To be announced

Appendix 4 – Proof of Pre-Submission Posters

A screenshot of a cell phone

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