

Our new Local Plan Consultation Strategy

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1.0. Introduction

1.1. The purpose of this document is to set out the engagement strategy, which will inform how we engage with different stakeholders on the new Local Plan.

1.2. It also sets out the shared objectives and processes of engagement to team members and external parties.

1.3. Ealing council's Statement for Community Involvement (SCI) outlines the standard consultation requirements and identifies the range of engagement methods available to reach all stakeholders. This strategy builds on the SCI to set out, in more detail, engagement methods at the Regulation 18 and 19 stages of the Local Plan.

1.4. We aim to involve everybody in shaping the places we live and work, and we will ensure everybody knows how to make comments on our policies.

2.0. Commitments

2.1. Ealing Council is committed to improving the way in which the community is involved in planning for the borough. We will start with ensuring that all sections of the community, statutory bodies and other interested parties, have an opportunity to engage in this new Local Plan.

2.2. We are heading into our next phase of engagement, a statutory consultation

known as Regulation 18, that explores the range of policies and sites proposed across Ealing.

3.0. Principles

3.1. We have created eight key principles to guide our engagement on the New Local Plan.

- Engage widely, by ensuring we are talking to communities we have not reached before.
- Engage with better accessibility, by producing information that is clear and understandable to the different community groups and by building processes that are accessible to different people, i.e. different educational needs, disabilities, demographics etc.
- Engage on what matters to people such as culture / place / safety / neighbourhoods
- Engage transparently, by ensuring all progress / changes are clear and visible.
- Engage honestly about:
 - Our priorities – jobs, climate change, inequality
 - The limitations on us – time to change/housing targets etc
 - What value communities are getting from this.
- Engage by actively listening to our communities and drawing up an effective feedback loop that truly reflects what people have said.
- Engage collaboratively with our diverse communities by giving them a say in the process.
- Engage early and take into consideration local insights and the unique perspectives of our communities that we might not have.

4.0. What engagement has already happened?

4.1. The Area Regeneration team are undertaking ongoing community engagement programmes to inform the development of community-led 20-minute neighbourhood frameworks for Northolt, Greenford, Perivale, and Acton. The engagement findings have been, and will continue to be shared to feed into the Local Plan evidence base. The Area Regeneration team are currently seeking resources and funding to expand this work to cover all seven towns.

4.2. The first phase of the non-statutory consultation on the new Local Plan was launched on 10 November 2021 as a suite of activities under the [“Shaping Ealing”](#) umbrella. It consisted of an online survey 'Give My View' on the Built-ID digital platform, a series of community engagement events, and conversations held in various parts of the borough that engaged our residents, businesses, and other stakeholders. This was so we could learn more about their priorities and issues.

These priorities and issues will be used to guide our proposals in the new Local Plan Regulation 18 consultation. Regulation 19 will be a 6-week consultation on our final proposals. It will be focused on policies and proposals informed by the Regulation 18 consultation.

4.3. The Shaping Ealing survey closed on 9 May 2022, and received the biggest ever volume of feedback for any public consultation, consisting of 10,661 responses.

4.4. Below are the themes, in order of concern:

(Note: these are the overall borough results. Results vary slightly with each town, and we will use town results to facilitate the town specific workshops).

1. 'Good range of affordable homes' – **Most concerning**
2. 'Happy with the way my area is changing'
3. 'Air is clean'
4. 'Good employment opportunities'
5. 'Safe walking and cycling routes'
6. 'Good range of shops and leisure facilities'
7. 'Feel safe'
8. 'Good local facilities e.g. schools, GP surgeries, libraries'
9. 'Clean and safe parks and open spaces'
10. 'Sense of belonging'
11. 'Feel welcome here'
12. 'Different backgrounds get on well together'
13. 'Good public transport' – **Least concerning**

4.5. There are two [Shaping Ealing](#) survey result documents to view, a very short summary of the results by town, and a more extensive summary providing a little more detailed analysis and some statistics about the make-up of each of our towns.

5.0. The New Local Plan three core themes

5.1. There are three core themes underpinning the new Local Plan strategy. These themes set out the social, economic, and environmental challenges and trends we expect the borough to encounter over the next fifteen years. By engaging with our borough, we will collectively develop sound policies that help us achieve the objectives of these themes.

5.2. **Climate Action:** Ealing Council declared a climate emergency in April 2019. We strive to become a carbon-neutral borough and organisation by 2030. We will:

- Establish a spatial vision with supporting policy.
- Influence new development and infrastructure.
- Manage public land and assets.

- Commission public services that support reducing emissions and creating resilience to climate change impacts.

5.3. Inclusive Economy: Ealing will ensure a sustainable, inclusive, and socially just borough where residents, businesses, towns, and communities grow and thrive together. Policies will encourage an equitable distribution of regeneration and investment and spread of associated benefits across the borough's seven towns including:

- Access to new employment opportunities
- New genuinely affordable homes
- Enhancements to prosperity and wellbeing of residents
- Environmental benefits

5.4. Policies will nurture existing businesses whilst attracting new sectors and industries to the borough to create a more diverse, resilient, inclusive, and green economy. Town centres will be repurposed and re-imagined, so they become more vital and resilient.

5.5. Further information in relation to inclusive economy can be found within the Affordable Workspace Study, the Industrious Ealing Study, and the 20-Minute Frameworks as part of the wider [evidence base](#).

5.6. Healthy Places: Growth and new development will only be acceptable if health and wellbeing outcomes are prioritised. The new Local Plan will influence health across a broad range of social, economic, and environmental factors. This theme looks at opportunities to:

- Increase access to quality green open space
- Enhance town centres, economic opportunities, and community facilities
- Support healthy food options
- Improve health care services
- Enable opportunities for active travel
- Deliver well-designed affordable housing and creating jobs
- Reduce crime and increasing community cohesion

6.0. Objectives

6.1. Our objectives set out our short-term goals on how we will engage meaningfully during these consultations and the steps we will take to ensure a successful completion of the Regulation 18 and 19 consultations.

6.2. Transparency. We will achieve this by providing open and clear communication with our stakeholders, by setting out steps on how we will consult and how representations will be made and honestly influence changes to the new Local

Plan. We will also set out targets and site-specific physical and economic constraints. To maintain transparency we will set up regular communications setting out the local plan-making process and make it clear where communities and stakeholders should/could be involved, e.g. events, workshops, seminars and talks, using social media, leaflets and other methods to advertise how people can get involved. We will also document consultation responses and provide feedback where appropriate in a clear, accessible, and understandable manner, limiting jargon. Transparency throughout the Local Plan process will help us build and maintain trust with our stakeholders.

6.3. Provide varied & innovative systems and ways to engage. We will achieve this by establishing a process to conduct stakeholder engagement with different groups. These methods will be both digital and in-person to accommodate all learning needs and accessibility requirements. We will outline in the methodology section what these methods are and how we will use them to engage.

6.4. Make efficient use of resources. Ealing Council has already undertaken significant engagement across its seven towns through its regeneration programme and other consultations taking place around the same time as the Regulation 18 consultation. We will coordinate with those departments to combine engagement events and limit consultation fatigue. Outreach during the Regulation 18 consultation will use existing stakeholder contacts from people who signed up to be contacted through the Shaping Ealing survey, or sent requests in other ways such as by email.

6.5. We will ensure the relevant council officers attending the consultations are briefed and knowledgeable on the issues to be discussed, to avoid consultation fatigue and re-visiting well-worn narratives.

6.6. We will consult with the relevant departments such as Community Engagement, and the Regeneration team to maximise their existing knowledge on engagement.

6.7. We will use planned engagement events across the borough to deliver Local Plan information and signpost stakeholders to the relevant engagement platforms.

6.8. Reduce risk to the new Local Plan. We will engage meaningfully with everyone to ensure key policy issues are addressed at the Regulation 18 and 19 stages. Feedback will be recorded accurately and reference the individual/institution making those recommendations, and we will re-engage with those individuals/institutions.

6.9. The data analysis team will play a key role in reporting back data throughout the consultation process. The team will ensure reporting back from the digital platform is frequent so that we know which communities we are reaching. For instance, if the results show we are not reaching younger people, we will rethink and develop other engagement/marketing methods to achieve this.

6.10. Key to achieving these objectives will be using our Shaping Ealing

branding identity. The branding identity will:

- Support engaging content that resonates with different demographics and encourages them to partake and give their views.
- Support people in identifying their local neighbourhoods as belonging to them and as such, have a sense of ownership and a say in the future of their area and the borough as a whole.
- Helping to distinguish the difference in characteristics and identity of each town.

7.0. Engagement during Regulation 18 and 19

7.1. Engagement type

Engage - Gives stakeholders agency during discussions and negotiations.

Inform - Share what we have done and are planning to do. Raise awareness.

Consult - Provide more detailed information, there is on-going dialogue. 7.2.

What is the difference between Regulation 18 and 19?

- Regulation 18 will present initial proposals in a draft New Local Plan document. Responses to the consultation will help us to further develop policies and the overall borough spatial strategy.
- At Regulation 19, final policies and recommendations for sites are presented to key stakeholders. This phase is more focused and technical.
- At Regulation 19 we will ask stakeholders their assessment on whether the New Local Plan passes the four Tests of Soundness and if it is compliant with relevant legislation.

7.3. The Four Tests of Soundness

Positively Prepared - The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet

Justified - The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective - The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

Consistent With National Policy - The plan should enable the delivery of sustainable development in accordance with the policies in the framework.

7.4. Overview of the Regulation 18 consultation process

7.5. **Outreach:** We will use a range of outreach methods to advertise the launch of the draft New Local Plan Regulation 18 consultation. Outreach will outline why it is important to get involved and how. We will publish a list of engagement events and times to attend and will provide links to the surveys and the other ways available to provide feedback.

7.6. **Engagement:** will be carried out through different methods such as the town workshops, events, exhibitions, walks, presentations and focus group workshops. Engagement will include an introduction to what a local plan is, the document structure and what to comment on, and activities to engage people. Attendees will be directed to other forms of engagement to provide feedback.

7.7. **Feedback to respondents will be done through one main method:**

- A report will be published at the end of the consultation

7.8. All respondents will be notified of updates.

8.0. Methodology for the Regulation 18 and 19 consultations

First stage of statutory consultation: Regulation 18:

Consultation Stage	Outreach	Activity	Outcomes
First stage of statutory consultation: Regulation 18 (6+ weeks)	<ul style="list-style-type: none"> > Social Media: Facebook, Instagram, Twitter. > On our website – Local Plan Ealing Council web page. > Give My View marketing. > Emails to already existing members on the Shaping Ealing, 	<ul style="list-style-type: none"> > Give My View digital survey with two user journeys. A shorter survey to engage a large proportion of the local community and a longer survey embedded in the document. > Development sites and policies workshops – one 	<ul style="list-style-type: none"> > Increase in different demographics attending workshops. See <i>section 7.2</i>. > Increase in knowledge and understanding about planning matters through Local Plan

Consultation Stage	Outreach	Activity	Outcomes
	<p>Local Plan, and Ealing Council newsletter database.</p> <p>> Community champions (underway for community champions to be established).</p> <p>> Leaflets, posters, Emails, Presentations, stalls, conversations, notice boards.</p> <p>> Internal communications.</p>	<p>for each town, for the local community and interested stakeholders to discuss a range of policies, sites and development within each town.</p> <p>> All policies workshops to discuss broader themes policy options.</p> <p>> Pop-up events, such as in Ealing Broadway shopping centre square, stalls at events and other locations across the borough, i.e. religious institutions, educational institutions and at community organisations.</p> <p>> Presentations and conversations</p>	<p>knowledge sharing.</p> <p>> Motivating and inspiring different communities to make representations on a broad set of policies for each town and other policies.</p> <p>> Different departments within the council have an understanding and awareness of the Local Plan.</p> <p>> More developed set of policies and recommendations that takes us into Regulation 19.</p>

Consultation Stage	Outreach	Activity	Outcomes
		<p>assisted by community representatives.</p> <p>> Internal communications with departments.</p>	

Second stage of statutory consultation: Regulation 19

Consultation Phase	Outreach	Activity	Outcomes
<p>Second stage of statutory consultation: Regulation 19</p> <p>We assess the draft New Local Plan against the four Test of Soundness.</p> <p>i.e.</p> <p>1. Positively Prepared</p> <p>2. Justified</p>	<p>> On our website – Local Plan Ealing Council web page.</p> <p>> Emails + Letters to already existing members.</p> <p>> Internal communications.</p>	<p>> Specific development sites workshops with key stakeholders one for each town – discussing how we’ve developed sites and policies from Regulation 18 and ask for feedback.</p> <p>> Pop-events, such as in Ealing Broadway Shopping Centre</p>	<p>> A more focused/reduced number of representations on very specific policies and development proposals.</p> <p>> Motivating and inspiring different communities to make representations on set policies.</p>

<p>3. Effective</p> <p>4. Consistent with national policy.</p> <p>(6+ weeks)</p>		<p>square, stalls at events and strategic locations, i.e. religious institutions, educational institutions and at community organisations to make the general public aware of the plan.</p> <p>> Internal communications on feedback from regulation 18 and how we've developed the draft New Local Plan, with relevant council departments.</p>	<p>> Create a sense of shared ownership of the plan with the general public as they will be commenting on policies that they have helped shape during Regulation 18.</p> <p>> A more developed draft New Local Plan that truly represents what our borough needs.</p> <p>> A draft New Local Plan that passes the Test of Soundness and is ready to be submitted to the Secretary of State.</p>
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8.1. We will deliver an inclusive, accessible, and far-reaching approach to consultation by holding a stakeholder mapping exercise to identify key groups and adopting an approach for engaging those groups. Our approach:

1. Firstly, identify communities and groups we have not reached before by outreaching to cultural hotspots surrounding development sites. We will also brief councillors, outreach to religious institutions, national health services, educational institutions, community organisations and community representatives to help us reach those groups.

2. Through conversations with under- served groups, we will develop best practice of engaging with them on the New Local Plan themes and how to tailor our workshops and events to accommodate for different needs.

3. Working with the Inward Investment team to identify opportunities to consult and engage with businesses & developers and the wider regeneration industry.

4. Looking at demographic needs, accessibility needs and creating an engagement approach tailored to different groups i.e. engaging with local youths will look very different to engaging with older people. We will look for support from councillors, youth workers, collectives, schools, social prescribers, GPs and specific organisations that engage regularly with these different groups. The SCI sets out possible methods of outreach and engagement to different groups in Appendix 2. We will go into more detail below.

8.2. Younger people 16+: young people want to be part of change, but they are the most under-represented age group in the planning process. They want to be heard and taken seriously. We will engage this age group through workshops and events that are also part of conversations themed on cultural spaces, inclusive spaces, climate action, and equality supported by youth workers and schools. These conversations will stem from their lived experiences of place. Social media will also play a key role in reaching this demographic. Twitter, Instagram, Facebook will be used to advertise, engage and inform younger people throughout the Local Plan making process.

8.3. Social Media and other marketing devices, events and making representations on policies through the shorter survey on Give My View / through in-person events.

8.4. Other marketing methods could be:

- QR Codes on visually appealing posters
- Stalls at events and fairs
- Youth workers to support in engagement events
- Education institutions - notice boards and campus webpages, assemblies.
- Start-ups, collectives etc..

8.5. Local Plan Champions: Acton town is already putting together community champions to support and inform the regeneration work in the area. Ealing could

utilise this initiative and expand on their support to accommodate for LP knowledge sharing and awareness across the Town. We could replicate a similar model across the seven towns. Champions are a great way to reach different demographics and community groups.

8.6. People aged 50+: especially those aged 75+ have been through a lot over the past few years, and just like younger people, they are generally under-represented in the planning process. For them, the pandemic has exacerbated social isolation and loneliness and, in doing so, has dramatically deteriorated people's well-being and mental health. The vast majority of our older population are digitally excluded. In 2019 according to the Centre for Ageing Better, there were four million people who had never used the Internet in the UK. Therefore, our methods for engaging with people over 50 will be more traditional such as in-person meetings and events, postcards, workshops during coffee mornings, using organisations like Together We Are Stronger, Age UK, Everyone Active, and other charities, social prescribers etc to reach and engage with our older population.

(please see appendix A for more detail)

8.7. Under-served communities, including those with limited computer literacy and/ access to technology and those with more limited literacy and/ numeracy / with disabilities and/ are time constraint. Local planning processes usually attract a specific audience, being middle class and white. Ealing is one of the most diverse boroughs in London, it has the highest growing BAME communities and is one of the boroughs with the highest population percentage. Our approach to engaging will have to be diverse, far-reaching, and inclusive. We will do this through several methods:

- We will go to the people by reaching out to community organisations and representatives from BAME communities and hold presentations at their community events and hold discussions on Local Plan issues that directly affect those communities.
- We will then ask for representations through different formats such as the give my view survey (translated into different languages), traditional methods such as paper format, and printed plans. We will support those that want to respond but do not know how to.
- We will deliver information and updates through community representatives.
- Built-ID has a translated function on their platform to help us reach more people from different communities.
- Also, religious institutions have notice boards, and we can use those to market our events and workshops. We will have a presence outside institutions to engage people as they go about their day-to-day life.

8.9. Capacity building & communication: Ealing Council will outreach to communities we have not engaged with before and younger people. We will hold

informal knowledge-sharing and skills-building workshops, before and throughout Regulation 18, on what policies are, how to comment on them, what to expect, and realistically what difference contributions will make.

8.10. Internally we will:

- Hold internal engagement workshops on how to engage meaningfully.
- Work internally through member & officer workshops to ensure a consistent level of LP knowledge, understanding and approach to engaging on the LP.
- Ensure the material for the first consultation is accessible and engaging.

8.11. Town Workshops: The **development sites and policies town workshops** will be detailed and hone on a range of sites and supporting policies in the different towns. We will present these options and invite all stakeholders to make representations. However, we envision communities and stakeholders within site boundaries will have a particular interest in these workshops. Each town will hold a day workshop (repeated twice).

8.12. Each group will have specialist officers from the relevant department and councillors present.

8.13. To device digitally engaging and innovative methods that sit with more traditional methods. We will develop both in-person and digital tools to consult with our stakeholders. Following the government's call for greater use of digital tools in the 2020 Planning White Paper, we will be using the Built-ID survey digital community engagement platform called Give My View. We will construct two surveys, a much shorter engaging survey targeting younger people and those that do not usually engage with a survey and a much longer survey spread out throughout the document and is specific to the policies presented for each town.

1. The longer survey is a set of questions spread throughout the document and can be recognised by being placed inside a speech bubble. These questions are specific to the policies.
2. The shorter survey is directly on Give My View and is made up of questions on the different themes and policies in the document.

8.14. We will hold pop-up stalls at local events, religious institutions, and high streets to maintain public visibility. This will attract passers-by representing a broad cross-section of residents and local people who may not have engaged otherwise. We will engage people by getting them to respond on the spot via forms and by scanning a QR code linked to the Give My View survey.

8.15. All printed and published online communications will go through an accessibility screening.

8.16. We will implement a robust feedback loop to actively re-engage and build a trusting relationship with our communities and stakeholders. As outlined in the Statement of Community Involvement, the Council will respond to the representations received in the following ways:

- Allocate each respondent a unique reference number and log the representation on a database.
- We will email respondents to acknowledge receipt of their representations.
- We will give full consideration to all of the representations received and engage in further discussions where this will assist us in developing the draft New Local Plan.
- The Council may contact consultees where necessary to clarify any points raised and investigate any issues.
- We will prepare a report summarising the representations received, and the Council's response to the representations. This will be made available on the Council's website and can be accessed in all borough libraries.
- When reports are ready, we will inform consultees by social media, email, through the Local Plan newsletter, other communication channels and on the Local Plan webpage.
- Any comments made on social media will not be counted as true representations. All appropriate forms of making representations will be made clear to the general public and statutory consultees.

8.17. Please note: Anonymous comments will not be considered. Any personal comments about individuals or groups of people will not be considered.

8.18. We will provide updates throughout the consultation using:

1. Built-ID & comms: by building a marketing campaign to target audiences through social media and other streams, such as on our website, events, workshops, and the Built-ID platform.
2. Use more traditional methods such as by email, our newsletter, post, library notice boards, community notice boards and at events etc...
3. Using council events to update stakeholders and direct them to the different streams.

8.19. Departments and individuals needed for the workshops:

- Climate Action
- Housing Development
- Community & Engagement
- Regeneration
- Planning
- Communication

- Councillors
- Service departments
- Support from apprentices

9.0. Duty To Cooperate

9.1. The Council is under a duty to cooperate with neighbouring councils and other statutory bodies across London. It is our legal duty to make them aware of our New Local Plan and invite them to make representations.

9.2. The Council will work closely with these statutory bodies (**see list in section 3.2 of the SCI**) to agree best practice for our proposals, especially in assessing areas for potential development.

9.3. **A full list of the groups we will consult is written in the Statement for Community Involvement (SCI).**

Appendices

Appendix A showing methods of outreach, engagement, and target response method for the public:

Audience	Outreach	Method of engagement	Target method of response
Younger people 0-16	Local youth programs such as: Young Ealing foundation. Schools. Community centres. Targeting local youths using Built-ID marketing. Social Media.	Engage through local sport events, school events, fairs, knowledge building workshops etc.	Give My View survey
Young adults	Targeting local	Engage through	Give My

16-25	youths using Built-ID marketing. Local youth programs such as Street Elite. Career fairs. Colleges. Universities. Shopping centre stalls. Art fairs. Social Media.	local sport events, school events, fairs, knowledge building workshops etc.	View survey, workshops, discussions.
Young adults 25-35	Universities. Town centres. High streets. Social Media. Businesses. Fairs. Job centres.	Topic conversations and events with guest speakers around climate change, jobs, housing crisis. Walking tours. Development sites and policy workshops.	Give My View survey, workshops, discussions.
Adults aged 36-55	Emails. Newsletter. Website. Town centres. High streets. Social Media. Businesses. Fairs. Libraries. Community notice boards. Supermarkets. Religious institutions.	Development sites and policy workshops. Walking tours. Library drop ins.	Give My View survey, workshops, discussions.

Adults aged 56+	<p>Emails. Newsletters. Website. Presentations at Lunch Clubs/Women's Groups/ Organisations etc. Local community publications. Local radio advertising. Community boards. Religious institutions.</p>	<p>Development sites and policy workshops.</p> <p>Targeted community presentations.</p> <p>Library drop ins.</p>	<p>Give My View survey, workshops, discussions. Responses also by mail and library depot boxes.</p>
Adults aged 75+	<p>Older people groups, care homes etc. Newsletters (printed). Presentations at Lunch Clubs/coffee mornings/ Organisations etc. Local community publications. Local radio advertising. Religious institutions. Community notice boards</p>	<p>Targeted workshops or focus groups - Development sites and policy workshops.</p> <p>Library drop ins.</p> <p>Targeted presentations at care homes and sheltered accommodations.</p>	<p>Workshops, discussions. Responses by mail and library depot boxes.</p>

