Department for Levelling Up,
Housing & Communities

PropTech Engagement Fund Round 1

Final Report

April 2022

COTSWOLD
DISTRICT COUNCIL

Local Planning Authority	Cotswold District Council
Date	26/04/2022
Theme	**Theme 1:** Plan-making Process: Regulation 18

YOUR
COTSWOLD
YOUR PLAN
CREATING A FUTURE
THAT IS GREEN TO THE CORE

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1.0   Project Aims and Objectives

Our aim was to migrate from the current consultation platform (Keystone Objective) to a platform that can improve local communities and businesses ability to digitally engage with local plan making, using the Cotswold District Local Plan (partial update) issues and options consultation as a pilot for the new platform.

Our objectives were to:
- make consultation documents and supporting information visually engaging, accessible, simple to understand and easier for people to use;

- increase the range of digital channels used to maximise response level and provide a greater insight into the needs and expectations of residents, businesses and communities on a wide range of topics – Local Plan, Housing, Climate / Environment and Council services; and

- reduce existing licence costs and Officer time involved in administering the consultation and engagement process (prior to, during and after).

This project has also enabled the Council to further deliver a key corporate priority of enabling a range of voices to be heard. In doing the above we hope to reduce existing licence costs and officer time involved in undertaking consultation / engagement exercises.

2.0   Project Summary

We consulted on emerging ideas and possible solutions to *make the local plan green to the core* (a corporate objective). Unlike most local plans this is not a full update and instead it focuses on interventions that can help reduce carbon emissions resulting from planned development.

The pilot allowed us to explore new ways of engaging with our residents, specifically;

- Early and effective engagement to ensure that a range of voices from within local communities are heard right from the beginning of the local plan process;

- Ensuring that documents and information are accessible in a range of different mediums and through various formats to ensure ease of access;

- Providing potential access to 'live' data during any specific period of consultation including for example, a summary of the key issues being raised by those who have already responded and access to relevant contextual information;

- Making consultation documents and supporting information visually engaging, accessible, simple to understand and easier to 'apply' at the local neighbourhood level;

- Feedback and communications between the formal consultations. This could include thematic informal engagement to assist policy drafting and site allocation; and

- Above all, reaching beyond the vocal minority and into the silent majority (in particular young residents) who often find it hard to feed into such formal processes and yet have invaluable views and experiences to share.

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A new consultation hub was created https://issuesandoptions.commonplace.is/. It used features to encourage engagement and ease of use in responding to often complex issues in the Local Plan.

Key to the project's success was the early preparation and adoption of a Communications Strategy. This was prepared with the support of the Council's Communications team. The strategy together with the team's knowledge and links with wider internal and external stakeholders helped to ensure messages were effective, responsive, timely and consistent.

The flexible nature of the software allowed us to add and move items during the consultation, in particular addressing issues of negative feedback. A good example was feedback we received from a few Town and Parish Councils during the consultation. They felt the consultation was too focussed on the individual and it was proving challenging for them to provide feedback using the platform. We were able to respond to this by creating a dedicated area on the platform to guide organisations on how to use the system and how to respond. This ability to respond quickly contributed to maintaining a positive relationship with these groups and importantly demonstrated that we listened and took action. Officers also invited Town and Parish Clerks to attend a couple of online training sessions on how to use the system.

The following provides a summary of the main activities carried out during the pilot. We:

- created a new Council sub-brand (Annex 1) to position the local plan as a stand-alone project, ensuring that it is recognisable through all stages of the consultation and that its collateral was easy to identify;

- split the local plan consultation into 18 easy to digest planning themes with a representative visual icon that aligned with the topic;

- produced a one-page topic papers for each of the 18 themes to act as gateway into the consultation, especially for those that are time poor and /or have minimal knowledge of the planning system;

- ensured that key messaging and social media content was written in plain English and were relatable to residents and businesses;

- create an area on Commonplace to appeal to younger residents between the ages of 13-18, incorporating condensed 'poll' type questions that can be completed in minutes;

- create a suite of social media graphics and video content[1] aligning with the 18 themes, in plain English, for use across all Council channels and to direct traffic to the Commonplace platform (Figure 2);

- commissioned an animated film[2] that captures the imagination by visually representing how Cotswold District could develop if proposals identified in the

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[1] Introductory video - https://www.youtube.com/watch?v=_aAu3IM4-70 (also hosted on Commonplace)
[2] Our vision for a net zero future video - https://www.youtube.com/watch?v=MrCCrJ6Tt1o (also hosted on Commonplace)

consultation were implemented. The film was used to drive traffic to the consultation platform;

- analysed the live response demographic data during the consultation. This enabled targeted communications to certain age groups;

- used the sentiment map functionality to allow respondents to comment on a specific area of the map - in particular sites contained with the recently updated Strategic Housing and Economic Land Availability Assessment. This function offered a quick and simple way for respondents to express their opinion on possible future development sites.

The council was awarded £63,000 in total.

3.0   Community Engagement Summary

3.1 We used the following outreach methods

- all district mail out, a postcard containing a QR code and site address of the consultation platform;

- Public and Town and Parish consultation events;

- social media campaign using paid for advertising;

- regular updates to our Local Plan database using the Commonplace software to direct email these consultees/subscribers;

- created an animation to use across all digital channels and drive traffic to the consultation platform;

- poster and advertisements placed across the district;

- all documentation was available at the Councils offices and all district Libraries; and

- Direct and continual communication with our Town and Parish Councils.

3.2 The main challenges we faced were

- an exceptionally short timeline; circa nine weeks from procuring the platform to going live. The fast paced nature of the project coupled with the accelerated required learning curve to understand and maximise the platform's functionality did lead to some mistakes. Project management principles have been used throughout the project to log errors and put measures in place to eliminate future occurrences.

- This tight deadline also limited the ability to work with our Communities department and tap into their existing networks as effectively as we would have liked to.

- We would also have preferred to do more testing of the site and how the technology works prior to going live with the Consultation. While we are content with the outcomes we have very much learnt as we have gone along and had to react to issues rather than having the luxury of time to pre-empt these issues.

- We did not maximise the use of the campaign tracking that the software enables us to use. We were not fully able to measure the effectiveness of the all district mail out.

- The difficulty of securing a representative engagement through formal / regulatory engagement processes. Those under 35 years of age are poorly represented in the consultation despite increased presence on social media platforms and targeted marketing.

- The complexity of plan making puts people off from engaging with planning. Complex issues, overly technical reports and evidence and difficult to understand regulatory / policy interventions were cited as reasons for not engaging.

- Any guidance on good examples of younger people engagement and example materials of where other Councils have been successful in achieving this would have been helpful to guide us in creating ours.

3.3 Surprises

- A 29% increase in the number of subscribers (an additional 646 individuals). Commonplace's sharing and news post functionality was a key reason for the increase in subscriptions;

- Take up of residents using the digital tool and a reduction in traditional methods of making representations (email and letters);

- A continuing reluctance of professional planning firms and statutory organisations to use digital engagement tools; and

- The increasing number of extension of time requests form statutory bodies to respond to the consultation, of particular concern was the Environment Agency.

4.0   Pilot Outcomes

4.1 Engagement

During the consultation we recorded 6,532 people visiting the consultation platform (approx. 7% of the district's population). Figure 1 shows how the software allows us to track and see when and where the traffic was coming from. We found it an excellent tool that helped to identify the most successful means of driving traffic to the consultation platform and it directly influenced and shaped marketing and engagement through the consultation.

Figure 1- A graph showing the visitor traffic to the consultation site during the consultation. In particular you can see in late February a drop in traffic that coincided with several winter storms. Peaks in visitor traffic graph correspond to email notifications known as news posts and social media marketing.
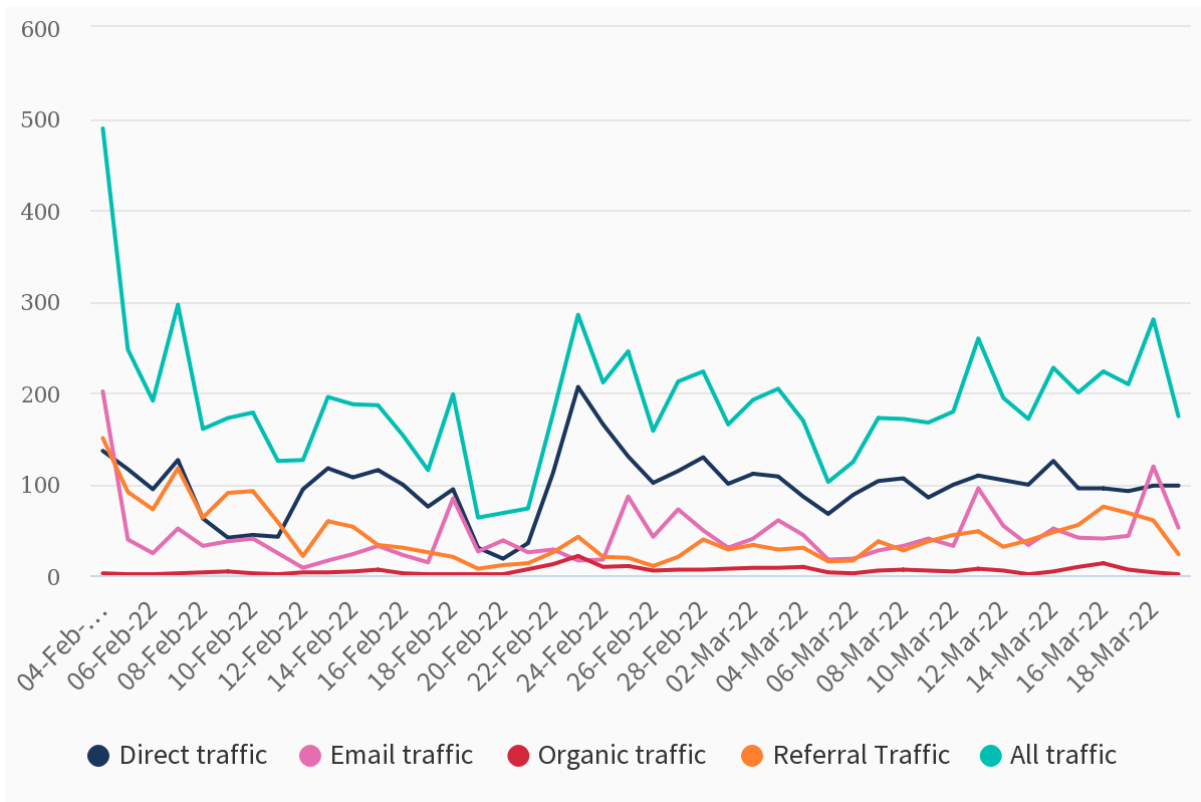
We set a target of securing 500 respondents prior to the consultation starting; an ambitious 45% increase on a similar consultation held back in 2015. We recorded 755 respondents (individuals and organisations) making just over 2,900 representations. This represents a 119% increase in the number of people engaging with an early stage local plan consultation.

Tables one and two show a direct comparison in how people submitted their comments in 2022 and 2015.

In 2022, 19% of responses were received via more traditional methods of email and letter, this is a marked change from 2015 when 71% of all responses were received via email and letter. We estimate that this change has resulted in a 40% reduction in officer time required to manually input this information at this stage.

The vast majority of the development and planning consultancy industry continue to engage with local plan consultations via emails and letters as their primary method of contact, often including verbose client orientated reports. This resistance places administrative burdens on the council. The end result is it takes longer to prepare a Local Plan.

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Table 1 - Breakdown of responses by type (2022)

Issues and Options consultation 2022		% of consultation respondents
Total Respondents	755	-
Number of respondents used the online platform	611	81%
Number of respondents by email and letter	144	19%
- *Number of individuals*	*(52)*	*(7%)*
- *Number of Organisations / Developers*	*(92)*	*(12%)*

Table 2 - Breakdown of responses by type (2015)

Issues and Options consultation 2015		% of consultation respondents
Total Respondents	344	-
Number of respondents used the online platform	97	28%
Number of respondents by email and letter	247	79%
- *Number of individuals*	*(149)*	*(43%)*
- *Number of Organisations/Developers*	*(98)*	*(28%)*

Our gender analysis showed that 40% of respondents did not state their gender. Of the 60% that did, 26% were female and 31% male, with 1% selecting other and 2% preferring not to disclose.

![Department for Levelling Up, Housing & Communities]

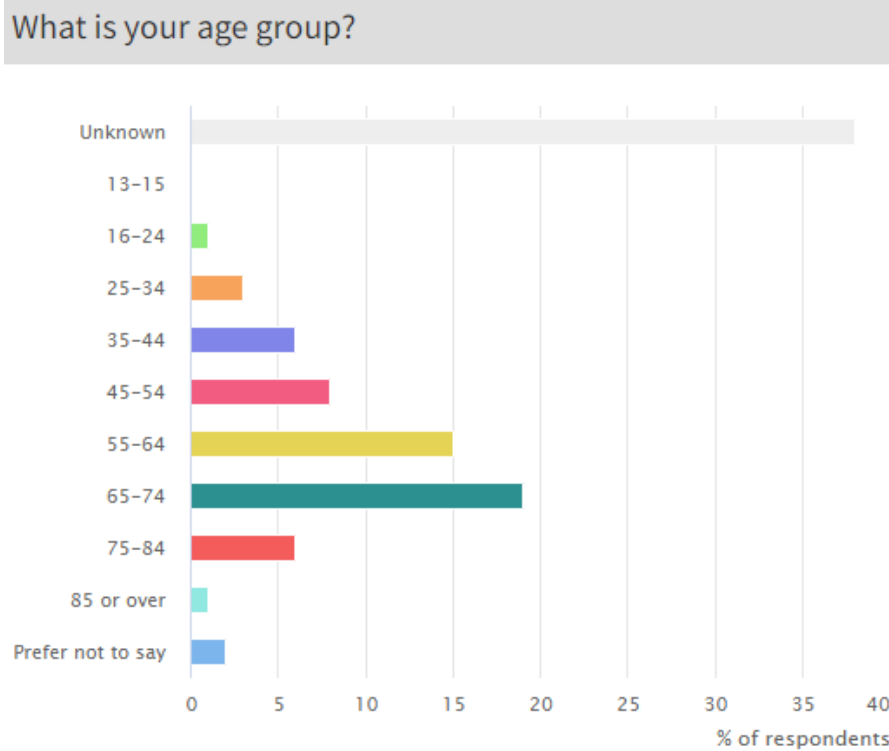Figure 2 - Graph showing the age group of respondents

What is your age group?

Figure 3 shows that the proportion of people aged 55+ responding to the consultation is significantly higher than the proportion of that age group in the Cotswold population, with a correspondingly lower degree of representation from younger age groups. Children under 13 were not explicitly included in the consultation.

Figure 3 - Graph showing the age demographic of respondents compared with population figures

Age profile of respondents compared to Cotswold District population (ONS 2019)
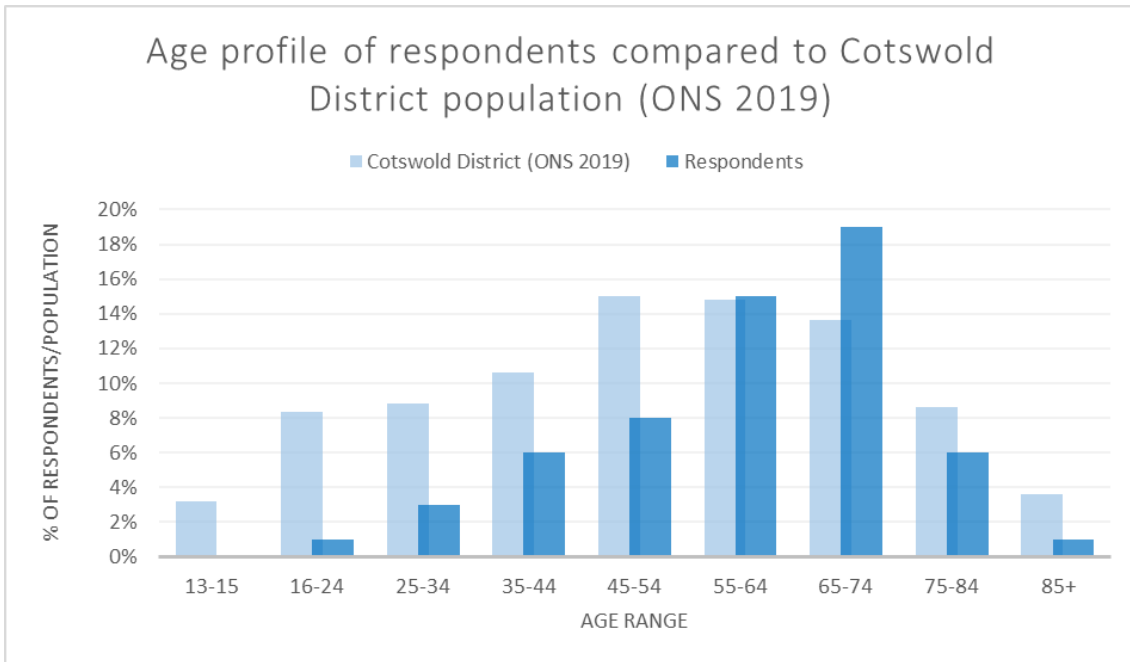
4.2 Summary of community feedback - key themes / learnings?

We are still in the process of analysing responses, however a message that occurred throughout the consultation was the amount of information and content was putting people off from engaging. Our software provider also received a large proportion of feedback saying the same. This is a familiar issue that has occurred in previous consultations and we had prepared a series of 18 one page summaries to mitigate this expected issue. With hindsight we should have led with these as the first entry point, rather than the main regulatory consultation document (topic papers) and evidence papers. This is definitely a key learning point and something to factor in when planning out future consultations.

A former community activist that opposed an urban extension in the adopted local plan welcomed the new platform and explained that it was a huge improvement and more accessible.

4.3 What changes (if any) have come about as a result of this project and opportunities to deliver further/ongoing digital engagement?

This project has introduced the opportunity for the Council to use the software corporately to increase their digital engagement. Having this software also provides us with the opportunity to compare demographic data across different areas to help us ensure we are reaching a representative proportion of the population.

4.4 Cost effectiveness - are there ways that conducting digital engagement allowed you to save time or resource compared to traditional methods of engagement?

The built in AI filters comments for abusive, racist and inappropriate language, which was previously done manually. This has removed a time consuming task from the consultation process. The larger than expected take up of using the platform resulted in an approx. 40% reduction in officer time needed to manually input letters and email into the consultation platform. . Tables 1 and 2 show that in 2015 28% of respondents used the digital platform, versus 81% in 2022.

Commonplace automatically analyses data (including demographics) - converts data into graphs, word clouds, etc. This can easily be downloaded into a consultation report, saving officer time.

The challenge the Council now faces is to establish how we sustain the cost of using more enhanced digital engagement platforms - which we found to be more expensive than historic and less technically advanced platforms.

5.0   Development/Implementation

5.1 How you developed/ implemented/ mobilised the product with your suppliers

We were under very tight deadlines to go live with the consultation, due to democratic processes we had largely prepared the content of the consultation and this had been agreed through the Cabinet process. Whilst this gave us an advantage in having a lot of the content prepared this also restricted how much we were able to change the content, including how we asked and phrased the questions. We were very well supported by Commonplace in the build and with advice on how to maximise engagement through the use of their tools. We were also able to smoothly transfer our existing list of consultees to the system. We were then able to use the systems sharing capabilities to help increase the number of consultees considerably.

We used project management principles to ensure we achieved our objectives. We created a strong project team consisting of the following specialists, town planners, digital engagement, communication and marketing, ICT, procurement and project management officers. Regular huddles / sprints with the project sponsor (a senior officer of the council) as chair helped to ensure progress was made and issues resolved quickly.

5.2 Lessons learned: Challenges you had to overcome e.g. people/skill shortages/ knowledge gaps

Our biggest challenge was time and how quickly we had to implement and learn how the system worked as we went. The other challenge was that when preparing the content we did not know what system we would be using or what the features were when composing questions. On reflection this somewhat restrained us from maximising the question types available to us and in future we shall approach this differently now we know what is available to us and how the data is extracted.

5.3 Lessons learned: Additional guidance and support that would have helped

Practical guidance on how to better engage with younger people and example materials of where other Councils have been successful in achieving this would have been helpful to guide us in creating ours.

5.4 Lessons learned: Any surprises you faced, or other reflections?

A surprise was the amount of time it takes to produce engaging content, for example the branding and animation. The Council's in-house Communications team were a member of the project team and led on certain aspects of the work as well as offering critical friend support to the town planners and digital engagement lead.

5.5 Lessons learned: Ongoing engagement requirements/ambitions for this project

We want to continue to use the platform to build on digital engagement for all departments across the Council. We will also be able to use the data more intelligently, sharing knowledge and connections across our communities.

6.0   Procurement

6.1 Procurement approach and outcomes

The Council's Procurement team were a member of the project delivery team and offered timely advice and support in the early stages of the project.

We carried out an extensive premarket engagement exercise and spoke to numerous vendors before requesting Best and Final Offers from a number of vendors. All vendors were invited to provide a demonstration of their systems.

6.2 Lessons learned

From the procurement perspective, this was a relatively straightforward tender exercise and there was support available through a third party – Advice Cloud - if needed. The guidance and support from DLUHC was clear and concise from the outset.

6.3 Working with suppliers - any reflections what went well or what you would handle differently next time with your suppliers?

Perhaps a more streamlined approach to the negotiation from the outset.

7.0   Conclusions & Policy Reflections

7.1 Were there any existing policies that limited your ability to maximise digital engagement outcomes?

There is a tension between what we are required to do in the regulations versus the new digital methods of digital engagement. For example, the requirement to capture names and addresses jars with the feeling of the right to remain anonymous on digital platforms. This is often a barrier to getting contributions from the younger people. Whilst this is not a requirement at Regulation 18 we thought it was important to identify a platform that is capable of capturing this data as it is a requirement at the Regulation 19+ stages. This also posed a problem when identifying a preferred supplier as at the point we picked ours, it was the only platform capable of capturing and presenting all of this data.

7.2 Where do you think further engagement guidance is required (this could include guidance for both local authorities and the wider proptech / consultancy sector)

Further engagement guidance is required in how far we can go in simplifying the language without risking falling down at examination. There is a tension between meeting the regulations so as to pass the examination in Public process versus the needs and wants of the public to contribute to plan making in meaningful ways without having to wade detailed evidence and technical papers. More guidance from the government on how we can also offer simplified entry points without being accused of attempting to hide information would be

helpful.

7.3 Where and how do you think DLUHC could support LPAs in further adoption of digital citizen engagement tools, best practices and/or wider digital transformation?

- Updating regulations to reflect a digital era rather than a 20th Century style preference for printed copies, press adverts, etc.

- PAS training on the principles of effective consultation and best practice (a focus on the practical rather than the academic / theoretical). This should consider rural and urban examples.

- More detailed PINS guidance on their expectations when it comes to reviewing comments - e.g. a standardised spreadsheet

- Funding to continue to support digital engagement including funding to support people to service and support the platforms and tools. Whilst digital tools do remove and / or reduce various administrative tasks it does raise the need and expectation to have staff that are trained to use enhanced digital tools. Consider working with the RTPI to ensure such matters are embedded within academic town planning courses.

7.4 What longer-term changes (if any) do you expect to make as a result of the outcomes of this pilot?

Make the local plan project and its various sub-projects (e.g. we currently have identified 25 such projects that feed into the local plan partial update) more visible using the commonplace platform. This includes creating more engaging content and simplified entry points into the various projects. This will help to reduce customer service enquiries and promote self serve.

Adopt a more data-led method of consultation and continue to trial methods of improving representation of younger residents in the plan making process.

Move towards a more spatial approach to consultation - feedback showed that people would engage more if they knew the impact planning proposal would have on their local area. The updated Design Code project (that will be run over the next 12 months) will trail Commonplace's spatial functionality further.

ANNEX 1 - Branding and Logo

Branding and logo examples

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CREATING A FUTURE
THAT IS GREEN TO THE CORE

**Examples of the icons
created to accompany
the topic themes**

Economy and
Employment

Natural Capital and
Ecosystem Services

Responding to
the Climate Crisis

Sustainable Transport
and Air Quality

Historic
Environment

Neighbourhood
Development Plans

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CREATING A FUTURE
THAT IS GREEN TO THE CORE

Cotswold District Local Plan
(partial update)
Issues and Options Consultation
Friday 4th February until
Sunday 20th March

Take part in the
consultation
and help us to create a
**GREENER
FUTURE**
for the Cotswolds

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issuesandoptions.commonplace.is

**Example of the
branding in use on
Social media**

**Example of the
branding being used
on a flyer**

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CREATING A FUTURE
THAT IS GREEN TO THE CORE

We need to take action
to tackle the climate and ecological emergencies
and ensure there are enough homes for local people
now and in the future.

COTSWOLD DISTRICT LOCAL PLAN
(partial update) Issues and Options Consultation
Friday 4th February until Sunday 20th March

COTSWOLD

We have a new online consultation platform that makes it easier
for you to let us know what you think. Please scan the QR code
(using your phone's camera app) to take part in the consultation.

Alternatively you can access the consultation by visiting
issuesandoptions.commonplace.is

You can also come and talk to us about the proposals.

2nd March, 2pm - 6.30pm
Cotswold District Council Offices,
Trinity Road, Cirencester, GL7 1PX

9th March, 2pm - 6.30pm
Moreton-in-Marsh Area Centre, GL56 0AZ

Hard copies of the document are available to view at both Council Offices,
Trinity Road, Cirencester and Moreton-in-Marsh as well as all District Libraries.

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GL7 1PX Telephone: 01285 623000 or email: localplan@cotswold.gov.uk