



ARMADA WAY PLYMOUTH

Consultation Strategy and Plan



Armada Way – Plymouth City Council Consultation Strategy and Plan September 2023

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1. Executive Summary

This document sets out the consultation strategy for the proposed new scheme for Armada Way. The consultation will likely launch in mid-October and run until mid-November 2023.

The aims of the consultation are to ensure a robust, transparent and inclusive process that will withstand external scrutiny.

In summary, the approach has been set out as follows:

July/August

- Familiarisation with the past consultation and what lessons could be learnt.
- Mapping out the consultation approach.
- Stakeholder mapping and building contact lists.
- Building the brand for the consultation and setting out the response mechanics.

August/September

- Pre-consultation engagement with high priority stakeholders in order to:
 - Understand their perspectives on what happened in the last consultation and as a result, what should be taken into account during the forthcoming one
 - Build relationships with them so that they have a point of contact and understand how they and contacts in their networks can get involved
 - Ascertain any channels they can provide to disseminate information about the consultation
- Develop the consultation materials:
 - Website with holding page pre-launch
 - Information boards
 - Survey
 - FAQs
 - Posters and postcards
 - Graphics of the proposed scheme
- Organise the consultation channels:
 - On-street surveying dates and resource
 - Recruit and set-up workshops with families, people with disabilities and older people
 - Agree digital outreach campaign
 - Develop a communications plan for distributing updates
 - Organise distribution of posters of the scheme and postcards with QR codes
 - Confirm display of information boards
 - Agree placement of hard copy surveys at the library
 - Book in 1-2-1 interviews with high priority stakeholders
 - Email around 250 contacts on stakeholder database to encourage sign-up to website and announce the launch.

October/November

- Finalise all materials ready for launch (once CGIs are ready)
- Launch the consultation:
 - Launch the website with survey, map, FAQs, info-boards and slider-tool

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- Email all stakeholders on database to notify of the launch
- Reach out to high priority stakeholders and those that have agreed to distribute in their networks
- Issue press releases with weekly updates
- Run 6-week digital campaign especially targeting families, young people and business owners
- Businesses on Armada Way to put up posters and have postcards with QR codes in their outlets
- Surveying team out on the streets at different periods of time throughout the consultation period, speaking to residents, shoppers and business staff/owners
- Hard copy materials on display and surveys at library
- Undertake 1-2-1 interviews with stakeholders as scheme will be shared
- Undertake workshops with families, people with disabilities and elderly people
- Analyse all data during and after close of the consultation
- Notify all of the close and next steps
- Write the consultation report.

December/January 2024

- Share findings with the members and PCC project team
- PCC to undertake period of conscientious consideration to discuss the findings and how they will be applied to shape the proposed scheme
- Post the consultation report on the website and PCC website, with next steps in terms of how the findings have been applied and what that will mean for the new scheme.

2. Introduction and Context

This document details the community and stakeholder consultation strategy and plan regarding the proposed new scheme for Armada Way in Plymouth City Centre. This activity follows on from a number of consultation exercises starting in 2018 as part of the Better Places consultation through to Spring 2023. During early 2023, there was vocal opposition to the proposed removal of the trees on Armada Way and an injunction to stop the felling process was served on the Council, after the majority of the trees were felled. Those felled trees now lie along Armada Way until further action can be taken, once the bird nesting season is complete which should be in September.

Background

Over the years, Plymouth City Centre has started to look tired and past its best. As such, Plymouth City Council (PCC) put forward a scheme to transform Armada Way into a place where people want to sit and relax, play, meet up and enjoy some of Plymouth's great cafes and shops.

The aim of the scheme is to lift and rejuvenate the city centre, making it more attractive to shoppers, residents, visitors and potential investors who are interested in coming to Plymouth, thus acting as a catalyst for local business growth.

On 19 May 2023, the new leader of Plymouth City Council, Councillor Tudor Evans OBE, set out 'his firm intention to rescue, reinvigorate and renew the city centre and reunite a divided city'. Within hours of becoming the Leader, he overturned the decision of previous Leader to progress with the Armada Way scheme, as had been developed. This means the current scheme **will not be** implemented and officers were tasked with working with members to bring forward revised options for the proposed regeneration project (bearing in mind the considerable work and cost associated with developing the previous scheme). The Cabinet have been clear that further consultation should take place on those parts of the scheme that are new/have changed. On 26 May 2023, the Council wrote to the claimant's solicitors asking them to withdraw their legal action, enabling the city to move forward. The claimants (who served the injunction) only agreed to withdraw their proceedings subject to certain conditions which the Council is unable to accept because it considers they far exceed what the Court would determine as part of this case. Therefore, the Council made an application to the High Court directly for it to consider bringing an end to the current proceedings on the basis they are now academic. The High Court refused the Council's application, so the application will now proceed to a two-day judicial review hearing. The date of this is unknown at the time of writing.

As per the High Court order, the Council passed on a revised methodology to the claimant in the legal case, outlining how it will carefully and safely begin the clean-up of Armada Way.

At the end of June/early July, the first phase of the clean-up commenced with the removal of the felled tree stumps from the footways between the sections on Mayflower Street / Cornwall

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Street and New George Street / Cornwall Street, temporary re-surfacing and the further pulling back of some of the Heras fencing.

In September, at the end of the bird nesting season, the remaining felled trees on Armada Way were removed.

The next steps are to share a proposed new scheme with the public and stakeholder groups for comment and feedback, to help shape key aspects of the design and understand any further impacts and/or issues to address. This document sets out the proposed strategy and implementation plan regarding that consultation process.

3. Consultation Principles and Legal Considerations

Principles

Engage Communicate Facilitate (ECF) uses the International Association of Public Participation's (IAP2) Spectrum of Public Participation as a guide when creating an consultation programme, as listed in Annex 1.

Given the scope of consultation, and its objectives (section 3), the programme fits into the “Involve” category in which the following elements are present:

- Goal: “To work with the public to make sure that concerns and aspirations are considered and understood.”
- Promise: “We will work with you to ensure your concerns and aspirations are directly reflected in the decisions made.”

In order to achieve this, the project team will need to undertake an extensive period of stakeholder consultation with those identified in this strategy. Through that approach, residents, representatives of stakeholder groups and businesses will be provided with opportunities to engage with the project team and multiple channels through which to provide their feedback.

In addition, ECF is a corporate member of [The Consultation Institute](#), which is a not-for-profit membership body, and global leader in consultation best practice and training. As such, ECF also adheres to the best practice principles of this body.

Key Considerations

It should be noted that the revised scheme falls under ‘permitted development’ and therefore a planning consultation regarding the revised scheme is not required. However, PCC wishes to undertake a robust consultation exercise regarding the proposed scheme and we should therefore take into account the best practice considerations around public consultation even though they do not directly apply in this instance.

In Plymouth and South West Devon's Statement of Community Involvement, 2020 Point 2.1 states that Council and other planning consultations should have regard to the following general principles:

1. Appropriate, meaningful, relevant
2. Integrity and honesty
3. Equality and diversity
4. Open and fair

5. New technology and e-consultation
6. Climate emergency
7. Responsibility and accountability.

When undertaking the consultation exercise, it will also be important to consider The Gunning Principles. These are a set of rules for public consultation that were proposed in 1985 by Stephen Sedley QC and later accepted by a judge to determine a court case. They consist of four rules, which should be followed to design a fair and worthwhile consultation exercise:

1. that consultation must be at a time when proposals are still at a formative stage;
2. that the proposer must give sufficient reasons for any proposal to permit intelligent consideration and response;
3. that adequate time is given for consideration and response; and
4. that the product of consultation is conscientiously taken into account when finalising the decision.

However, as extensive consultation has already been undertaken, meaning the proposals are not at the ‘formative stage’, PCC is *carrying out further consultation with the public on those elements that are different in addition to gathering feedback on the wider scheme*. ([see link for relevant case law](#)).

The Gunning Principles apply in that any consultation report should be clear to lay out exactly how the consultation programme has met the key elements of these four rules, especially in terms of undertaking conscientious consideration when decision-making post the consultation programme.

The Localism Act 2011 should also be taken into account and introduced the Duty to Co-operate, which requires planning authorities and other public bodies to actively engage and cooperate on strategic matters.

Finally, a promise to consult can generate a “legitimate expectation” that consultation will be carried out, and this can be upheld within court. Clear project parameters and expectations management, such as defined consultation open and close dates, are essential to abide by this rule.

4. Scope of the Consultation Process

It is important to note the principles of the proposed new scheme, and what has been revised and is therefore subject to consultation. Those revised areas offer ‘true scope for influence’ and a way in which those who respond to or participate in the consultation programme can help shape specific design elements of the scheme. As part of the preparation process, ECF will work with PCC to develop the narrative for the consultation programme based upon these aspects and will construct the questions/prompts for the survey and other feedback methods.

5. Objectives

Objectives

The overarching aim of this stakeholder consultation programme is to gain a deeper understanding of the aspirations of residents, businesses, visitors, and other stakeholders regarding Armada Way. This understanding will help to ensure a scheme is delivered that meets the long terms needs of people who work, live, shop, eat, play, and travel through it.

As such, this programme will ensure that the public and key stakeholders remain involved and engaged with the project.

The following objectives will underpin our approach to consultation:

- To deliver a robust and meaningful consultation process that will withstand external scrutiny, and aligns with The Gunning Principles
- To give true scope for influence over specific design aspects of the scheme that have been revised in line with feedback from previous consultation exercises
- To ensure the voices of Plymouth residents, businesses, visitors, and other stakeholders who use Armada Way are heard and truly represented, ensuring those with a stake in the proposals have a mechanism for feedback with which they are comfortable
- To enable open dialogue, where Plymouth residents, businesses, visitors, and other stakeholders can view the revised scheme and feedback without fear of persecution or intimidation
- To give a variety of methods for Plymouth residents, businesses, visitors, and other stakeholders to feedback and participate, especially for those who may be time poor and are unlikely to get involved unless we take a proactive approach to reach them
- To hear from people who work in and run businesses on Armada Way (and wider city centre), as well as those who reside there or use it for recreational purposes
- To maintain transparency and communicate timelines with the stakeholders and the public
- To coordinate activity with project timelines and goals, so that community and consultation activity is delivered in a coherent and structured manner
- To ensure all relevant stakeholders are identified in line with the Council's commitments to the Equality Act 2010, and to establish relationships with priority stakeholders that will help inform project proposals and plans.

6. Stakeholders

We will carry out a stakeholder mapping exercise that sets out the the list of key stakeholder groups to be proactively engaged as part of the process. This list will not be exhaustive and it will be added to as part of the preparation phase when reaching out to representatives of groups as they will make suggestions of whom to include from their networks.

It will include all residents / businesses / those who work in the city centre / schools and playgroups / groups that represent people with disabilities and elderly people / representatives of national and regional bodies / local groups and organisations / environmental groups and organisations / cycling groups.

Stakeholder Management

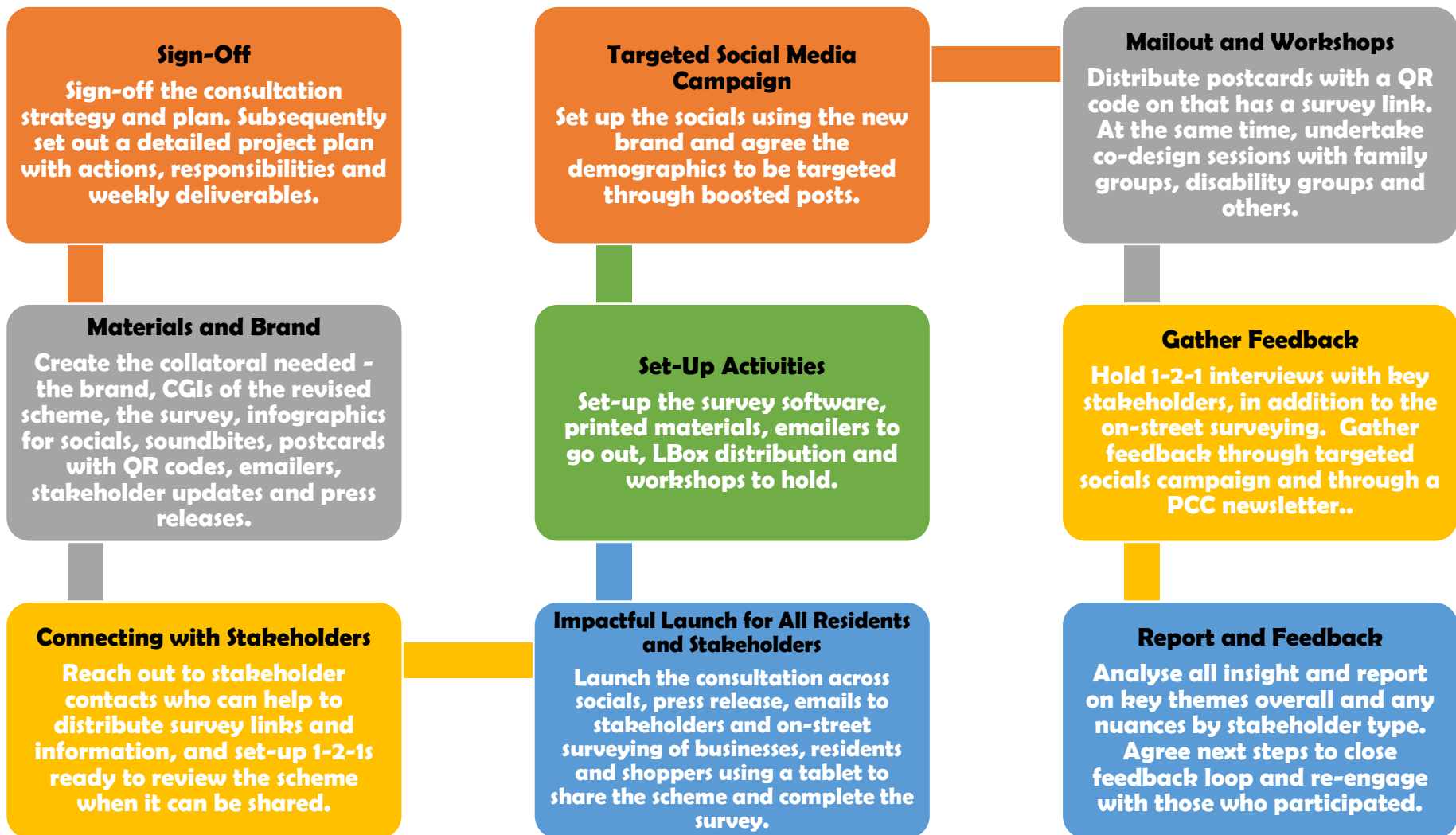
ECF will also utilise a stakeholder framework to ensure the effective management of groups is undertaken and logged through a CRM system such as Hubspot. In addition, we will create a ‘Terms of Reference’ which will be distributed to stakeholders at the start of the process and will act as the code of conduct that frames all interactions. This approach will ensure that all involved are treated with respect and empathy, in addition to setting an expectation that information will be shared within networks without misrepresentation or bias.

7. Consultation Activity

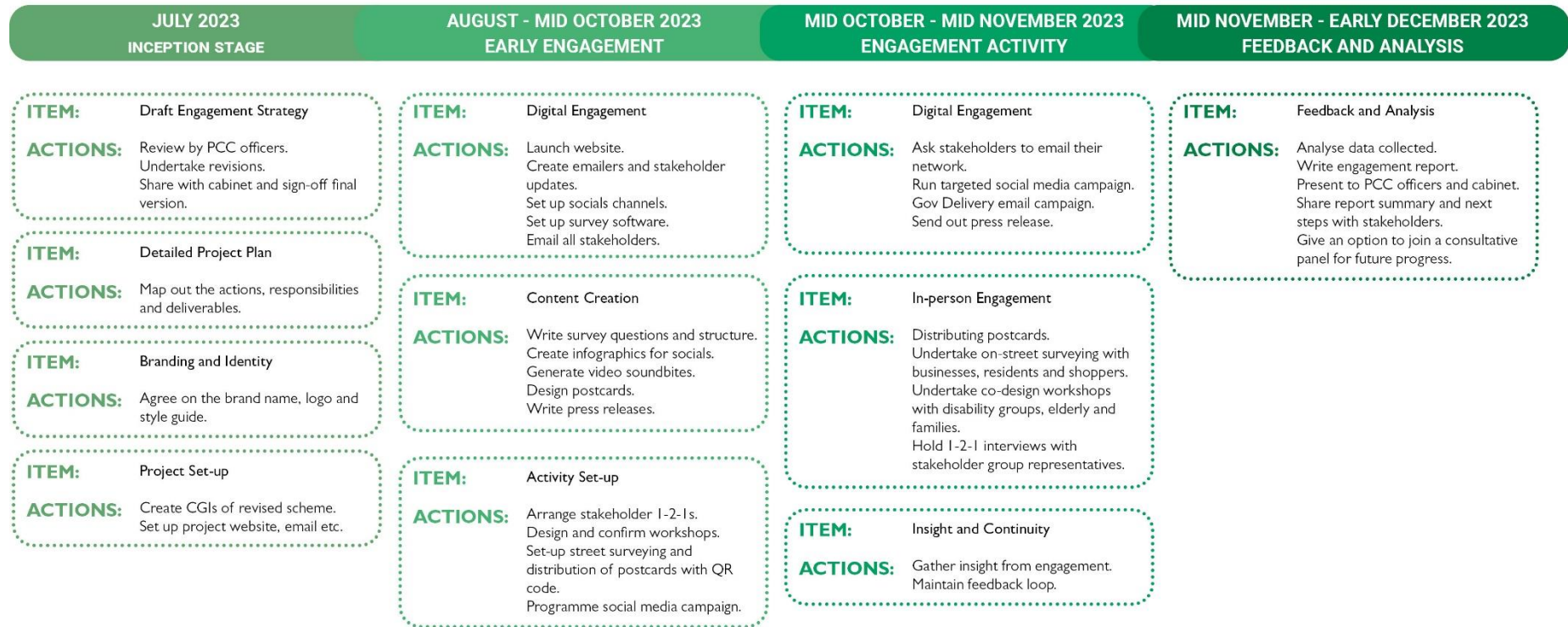
This section outlines the strategic approach to be taken to deliver meaningful consultation. In addition, ECF will undertake a series of workshops with PCC to clearly define the narrative that will be set out and the questions that will be asked which will clearly align to the parameters of what is in scope for consultation (see Section 3):

- This should be an iterative and meaningful process whereby the proposed new scheme is shared, insight is gathered which helps to shape key aspects of the final design, that design is fed back and the stakeholders continue to be engaged throughout the implementation process.
- The consultation process for the revised Armada Way scheme must adopt a distinctive and fresh approach, setting it apart from what has gone before. The consultation process should delve into greater detail, ensuring direct involvement and meaningful participation from a diverse array of stakeholders, particularly those who have been historically underrepresented. This inclusive approach will invigorate and revitalise conversations, fostering a broad spectrum of perspectives and promoting a sense of collective ownership and consultation.
- As many different channels as possible will be used to proactively hear from people from all walks of life who use Armada Way, so that the dialogue is not overwhelmed from those would actively participate in discussions, without encouragement, due to their passion for the project. Equal and appropriate weighting should be given to all voices.
- It is vital that people are given ample opportunity to review the revised scheme in detail so that they can feed back with an understanding of what it is trying to achieve.
- Where appropriate, co-design techniques will be utilised to work with groups to shape the design of spaces such as the play area and the market space.
- As many 1-2-1 techniques will be used as possible so that people feel comfortable to open up and feed back their thoughts without fear of being swayed by others in a group or public meeting environment.
- Unless otherwise requested by representatives of groups/organisations, all insight will be anonymised within the consultation report so that again people feel free to give their feedback.
- In line with the Data Protection Act, participants and respondents will be asked to ‘opt in’ to share their contact details so that they can be notified of the next steps and the response to the consultation report from PCC.
- We suggest that an individual brand is created to become an umbrella for the project as a standalone from PCC – such as ‘Let’s Talk Armada Way’.

The diagram over the page sets out an overview of our consultation approach.



TIMELINE



Programme

We have carefully crafted this timetable, drawing upon best practices for a consultation programme of this magnitude, while also taking into account the practicalities surrounding the availability of essential materials required to conduct the consultation (i.e. CGIs of the proposed scheme). In order to ensure that time is given to residents, businesses and other stakeholders to review the scheme in detail and feedback without pressure, the decision has been made not to hold a public meeting. Instead, multiple opportunities will be given to feed back on a 1-2-1 basis as shown below, these include:

- Agree a brand identity for the consultation process which will be used as an umbrella brand for all activities, such as ‘Let’s Talk Armada Way’
- Development of a survey which displays images of specific elements of the scheme with structured questions for feedback regarding those elements, followed by an overall view of the scheme and catch-all question at the end
- 1-2-1 interviews with representatives of stakeholder groups to gather feedback and encourage distribution of the survey in their networks
- On-street surveying with businesses in Armada Way, plus liaison with key representatives of business groups (such as the Plymouth City Centre Company) to garner their support in the encouragement of participation from business owners, managers and their employees
- Surveying on-street of residents living near to Armada Way, plus people shopping or visiting the area. In addition, surveying will be undertaken in other areas, particularly those that are more economically deprived, plus liaison with housing associations and other community organisations.
- Hard copy surveys will be available at the library and a permanent display of the scheme will be shown behind the windows of a vacant unit
- Distribution of postcards to addresses near to Armada Way with a QR code that enables a link to the survey to feedback
- Workshops with families regarding the design of the play area
- Workshops with people with disabilities and elderly people to understand accessibility requirements
- Social media campaign to target feedback from underrepresented groups, especially younger people and liaison with digital community groups such as the Gossip Girls
- Distribution of the survey link by PCC through their newsletter.

Activity during July 2023

The following activity took place during July to enable preparation of the consultation process to take place during August and September, for a mid-October launch:

- Review of the draft consultation strategy by PCC officers and Cabinet Members
- Undertaking any necessary revisions
- Shared revised version with the Cabinet
- Signed-off final version post Cabinet feedback
- Finalised the line of enquiry for the project
- Mapped out a detailed project plan with actions, responsibilities, and weekly deliverables in line with the signed-off strategy

Activity during August and September 2023

Early consultation with key stakeholders has begun, alongside which we have set-up the collateral and consultation activities for the wider public launch in October. We have had early contact with key stakeholder groups to gather their feedback on the consultation process and how they may be able to facilitate discussions within their networks:

- Branding and Identity: Agreed the ‘brand name’ for the consultation process, style guides, and collateral templates – to be agreed with the PCC comms team
- Developed a publicity plan with the PCC comms team
- Set-up the project website and email
- Launched the consultation website and additional content
- Written the survey questions and structure to enable feedback that will help shape the design, in addition to ascertaining the respondent type. This is likely to include images of the scheme with specific questions for each element
- Develop easy-read version of the survey
- Agreed the localities to undertake the street surveying
- Created infographics to share across socials and emails
- Generated video soundbites to help explain the scheme and its design features
- Designed postcards to be distributed with a QR code that holds a link to the survey
- Create emailers and tailored stakeholder updates
- Written press releases for the preparation stage, during the consultation process and at the close to explain what happens next
- Planned in political sessions with MPs and councillors
- Reached out to those key stakeholders who would like to actively participate to understand their aspirations for the consultation process (high priority stakeholders as shown in Section 4)
- Contacted stakeholder groups that represent families, the elderly and those people with disabilities, to arrange co-design workshops to be held in October
- Emailed all other stakeholder contacts to arrange the consultation 1-2-1 interviews to hold in October (to be undertaken via Teams, Google Meet or Zoom)

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- Set-up the socials channels and agree the targeted demographics to reach, including the digital community groups
- Set-up the survey software and link to share, print the postcards, agree the mechanic for requesting hard copy surveys, finalise the mailshot distribution radius for posting out the postcards with links, agree any necessary authorisation processes to undertake the on-street surveying, agree stakeholder interview scripts and finalise the details of the workshops.

Activity starting mid October 2023

The consultation will launch with a burst of activity in mid October to create impact and gather as much insight as possible. The timings will be finalised in the preparation, but it is likely that it will run for 6 weeks:

- Launch the consultation by:
 - Sending out the emails to stakeholders
 - Distributing the postcards to residents around Armada Way
 - Undertake on-street surveying with residents, businesses and shoppers using tablets to show graphics of the scheme with corresponding survey questions (includes Armada Way area and other conurbations – TBC)
 - Run the targeted social media campaign using infographics and link to the survey
 - Send out link within PCC newsletter
 - Send out press release
 - Place a permanent display of the scheme in the vacant unit and/or on the hoardings
 - Place hard copy surveys and information on the scheme in the library
- Undertake workshops with families, elderly people and people with disabilities. The style of workshops will be agreed during August/Sept, but will use visualisation techniques.
- Hold 1-2-1 interviews with key stakeholders to share the scheme and gather their feedback using a pre-agreed structure.
- Gather insight from all survey completions, workshop sessions and 1-2-1 interviews.
- Collate contact details to enable sharing future updates and to maintain the feedback loop.

Activity at November / December 2023

Once the consultation period has closed, the following activity will take place:

- Analyse all data for overall themes and nuances by stakeholder group/respondent type.
- Write the consultation report and draw out the conclusions.
- Present to the PCC Officers and Cabinet.
- Agree their response to the insight gathered ensuring a conscientious consideration process, whereby there is meaningful scope for influence over the design of the scheme.
- Contact all stakeholder groups and those who shared their contact details with a summary of the report, a link to the full report and an outline of PCC's response and next steps.

8. Issues Management and Risk Mitigation Measures

This section of the document outlines some of the initial issues we believe will have to be managed through the process. Alongside the identification of issues, we have detailed some proposals for mitigation.

At the macro-level, we will seek to pre-empt these issues by building trust with key stakeholders representing the local community and assuring them that a meaningful process will take place. The process will be backed by robust Q&As to maintain consistency and clarity across all individuals that will communicate on the project.

1. Maintaining the confidence of all stakeholders, including officers and members at Plymouth City Council:
 - a. A regular scheduled programme of face-to-face briefings with individuals and regular email updates to all councillors.
 - b. Advance notice of all consultation activity.
2. A single interest / campaigning group seeking to dominate or undermine the consultation process:
 - c. The revised scheme will most probably not address all the issues highlighted during the previous consultation, so the project team will need to be clear about the parameters of their proposals and what is in and out of scope
 - d. Targeted consultation will help to build trust among those with specific concerns and provide reassurance that they are being listened to
3. A failure to ensure diverse participation in the process:
 - e. Comprehensive stakeholder mapping to ensure all local groups, including those representing individuals with protected characteristics, are included
 - f. Compiled evidence of consultation with groups that reflect the nine protected characteristics will require liaison with community groups
 - g. Regular internal project team review of the key demographic data
4. Potential for digital exclusion, and lack of consultation accessibility
 - h. The consultation process itself is designed to encourage participation, meaning that both digital and hard-copy/in-person materials and methods will be deployed. All documents and online/offline content will be accessibility checked.

Appendix 1 – IPA2

IAP2 SPECTRUM OF PUBLIC PARTICIPATION

	INCREASING LEVEL OF PUBLIC IMPACT				
	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
GOAL	To provide balanced and objective information in a timely manner.	To obtain feedback on analysis, issues, alternatives and decisions.	To work with the public to make sure that concerns and aspirations are considered and understood.	To partner with the public in each aspect of the decision-making.	To place final decision-making in the hands of the public.
PROMISE	"We will keep you informed"	"We will listen to and acknowledge your concerns."	"We will work with you to ensure your concerns and aspirations are directly reflected in the decisions made."	"We will look to you for advice and innovation and incorporate this in decisions as much as possible."	"We will implement what you decide."