

# E7.1 Public Engagement Position Paper

## Overview of the Position Statement

1. This position statement addresses the Inspector's questions under Matter 1 addressing the Issue 1.3 on Public Engagement, particularly on questions 1.12 to 1.15. The statement focuses on:
  - a) **Identifying what went wrong:** Highlighting errors in the consultation process and database management.
  - b) **Explaining how these issues were corrected:** Outlining the steps taken to address the errors.
  - c) **Demonstrating that no prejudice occurred:** Confirming that affected individuals were notified, and representations were fully included.
  - d) **Confirming compliance with statutory requirements:** Establishing that the consultation process adhered to the Statement of Community Involvement (SCI) and relevant regulations.
  - e) **Proactively addressing secondary errors:** Detailing additional errors and their resolution to ensure a comprehensive response.

## Identifying what went wrong

2. During the Regulation 19 consultation for the Enfield Local Plan (28 March 2024 to 20 May 2024), the Council identified several issues with the consultation database:
  - **Spam Filtering and Email Management:** Hundreds of submissions were delayed or missed due to spam filtering protocols and high-volume email addresses being flagged by cybersecurity measures.
  - **Shared Email Submissions:** Representations submitted via shared email addresses were initially logged under a single entry, leading to undercounting of respondents.
  - **Policy Tagging Errors:** Some representations were misaligned with the policies they referenced.
  - **Duplicate Entries:** Manual entry errors resulted in duplicate representations being logged.
  - **Redaction Errors:** Personal information was inadvertently published in breach of GDPR requirements.
3. These issues became evident after the consultation database was submitted to the Planning Inspectorate on 6 August 2024, prompting the need for comprehensive reviews to ensure accuracy and compliance. The Council acknowledged these issues

and addressed them in a letter to the Inspector, outlining the steps being taken to resolve the identified problems and maintain the integrity of the consultation process.

## Explaining how these issues were corrected

4. The Council undertook a combined three-part review process to address these issues:

### Part 1 Review (August to September 2024)

- **Database Quality Checks:** Officers reviewed all logged representations to correct policy misalignments, shared email submissions, and duplicate entries.
- **Temporary Database Removal:** The database was temporarily removed from public access to address GDPR compliance issues.
- **Enhanced GDPR Training:** Officers received bespoke training to improve their handling of sensitive information and redaction processes, ensuring future compliance.

### Parts 2 and 3 Reviews (October to November 2024)

- **Enhanced Redactions:** Additional redactions were applied to safeguard sensitive data, including protected characteristics under the Equality Act 2010.
- **Addressing Remaining Concerns:** Local interest groups submitted a list of 257 individuals and over 600 email representations flagged as missing. These were reviewed, and issues such as shared email submissions and unreceived representations were resolved.
- **Collaboration with Local Interest Groups:** The Council worked with local interest groups to identify and integrate missing or partially missing representations. Paper-based evidence submitted by these groups was digitised and included in the database.
- **Comprehensive Cross-Referencing:** Officers meticulously reviewed these submissions and integrated any additional valid representations into the database.

### Part 4 Review (December to January)

- The Part 4 Review focused on verifying the final database's completeness and addressing any outstanding concerns raised by consultees. This stage ensured that representations flagged during earlier reviews were fully integrated, and final checks were completed to confirm the database's compliance with Regulation 22 requirements.

## Demonstrating That No Prejudice Occurred

5. The combined review process resulted in a significant increase in logged unique representations, from approximately 12,000 to 15,000. Following the identification of

missing representors, the database was updated to ensure completeness. Subsequently, all affected individuals, including those initially excluded, were notified of the examination dates and processes through targeted communication. This ensured that no participants were disadvantaged or excluded from engaging in the examination phase.

6. The Council took the following steps to ensure no prejudice occurred:
  - **Integration of Missing Representations:** Approximately 3,000 additional representations were identified and logged through the four-part review process.
  - **Notification Gaps Addressed:** All affected individuals were informed of examination dates and processes through targeted communication.
  - **Resolution of Stakeholder Concerns:** Collaboration with local interest groups ensured that flagged discrepancies were addressed comprehensively.
7. By addressing these issues, the Council demonstrated its commitment to transparency and inclusivity, ensuring that no participants were disadvantaged by the initial errors. These measures ensure that all valid representations are now included, enabling the Inspector to base examination on a complete and accurate dataset.

### **Confirming Compliance with Statutory Requirements**

8. The Council adhered to the requirements of Section 19(3) of the Planning and Compulsory Purchase Act 2004 and Regulations 19 and 22 of the 2012 Local Planning Regulations. Specifically:
  - The consultation process was conducted in accordance with the SCI, ensuring inclusivity, transparency, and accessibility. The SCI's principles of transparency and inclusivity were upheld through targeted re-engagement with affected stakeholders and comprehensive updates to the consultation database.
  - All identified issues were resolved, and the consultation database was updated and resubmitted to the Inspectorate on 6 November 2024, with publication on 9 November 2024, and subsequent updates made in December 2024 and January 2025.

### **Proactively Addressing Secondary Errors**

9. In addition to primary issues, the Council addressed secondary errors such as duplicate entries, incomplete records, and shared email submissions. Duplicate entries identified during cross-referencing were removed, ensuring the integrity of the database. These were resolved through detailed reviews and collaboration with stakeholders to ensure a comprehensive response.

### **Lessons Learned and Future Improvements**

10. The Council recognises the importance of improving future consultation processes. Key actions include:

- **Adoption of Digital Tools:** Exploring platforms like Limehouse or Objective to automate representation logging and improve data accuracy.
- **Enhanced Quality Assurance:** Implementing systematic checks during and after consultation periods to prevent data discrepancies.
- **Improved Communication Protocols:** Strengthening notification systems to ensure timely and comprehensive updates to consultees.
- **Officer Training:** Expanding training on GDPR compliance, data management, and consultation handling.

11. The Council plans to trial platforms like Objective in the next consultation cycle to streamline data collection. By adopting these measures, the Council aims to ensure that future consultation processes meet the highest standards of transparency, inclusivity, and statutory compliance.