

## Events in Public Spaces Discussion Paper

### Executive summary

The City of Yarra is home to many of Melbourne's most highly prized parks, gardens and reserves, as well as many of its busy and significant streets and transport paths. Across Melbourne, the demand for outdoor sites as venues for commercial and community events is increasing. Yarra receives many requests for events in its public spaces, and occasional large-scale events are held in Yarra's public spaces without prior approval from Council. An Events in Public Spaces policy is needed to shape Council's response to requests for use and to instances in which events are held without Council approval. An Events in Public Spaces policy is also necessary to ensure that outdoor events do not unduly impinge upon residents' and local business use of our public spaces.

This discussion paper is a step towards the development of an Events in Public Spaces policy, canvassing options as to how Council might better respond to requests, and oversee and manage events in our public spaces. The discussion paper solicits feedback on the proposed aims, objectives and directions for an Events in Public Spaces policy. It is intended to:

- establish Council's role in facilitating and supporting different kinds of events in public spaces
- establish Council's role in staging its own events
- achieve a balance between the rights of event participants and the rights of residents to enjoy their local amenity
- suggest a management framework for processing and overseeing events on Council-owned or managed public open space
- identify means to streamline the process by which Council handles requests for events in public spaces and
- ensure events in Yarra's public spaces comply with relevant legislation, Local Laws and guidance material.

The discussion paper recommends that Council establishes:

- A single point of contact for event enquiries, applications and planning responses
- A public register of open spaces available for events
- Transparent criteria for processing requests
- An annual and triennial expression of interest process for major events and
- An events in public places fee structure, tailored to the event type.

## Definition and scope

### Public open spaces

Public open space includes parks, river and creek frontages, streets, footpaths and nature strips. It does not include privately owned land or Council-owned or managed buildings used for events or gatherings. The term 'open space' means different things to different people in Yarra. Open space includes parklands, playing fields, gardens, reserves, streets, footpaths and public transport stops and stations.

### *Parks, playing fields, reserves and gardens*

While the list below is not exhaustive, the following public parks and gardens have been identified for the use of events and gatherings:

Amphitheatre, Fairfield Park  
Alphington Park, Alphington  
Barkly Gardens, Burnley  
Burnley Park, Burnley  
Citizens Park, Richmond  
Coates Park  
Curtain Square Park, North Carlton  
Darling Gardens, Clifton Hill  
Edinburgh Gardens Park, North Fitzroy  
Fairfield Park, Fairfield  
Flockhart Reserve Park, Abbotsford  
Kevin Bartlett Reserve, Burnley  
O'Connell Reserve Park, Richmond  
Quarries Park, Clifton Hill

### *Streets, footpaths and transport routes*

Although their primary purpose is transport, streets and roads also form an important part of the open space network in Yarra. Roads and transport routes are often the main sites of events (such as markets, festivals, parades, fun-runs, film-shooting and protests). In parts of Yarra where there are few open public spaces designated for recreational use, streets provide major opportunities for public events. They make desirable venues for community markets because they are visible and accessible to pedestrian and vehicle traffic. This discussion paper includes events where a public road, street, footpath or nature strip must be closed in order to be occupied for an event, or to be used for the parking of vehicles and/or equipment storage for the purposes of an event.

Some notable events of this nature include the Gleadell Street Market in Richmond, the Johnston Street Latin Festival, Fiesta, in Fitzroy, the Victoria Street Lunar Festival in Richmond, the Women's Cancer Walk (Kevin Bartlett Inc.) on Yarra Boulevard, and the Yarra Tri-Club Duathlon on Yarra Boulevard.

An Events in Public Spaces policy would comprehensively cover all public open spaces that are or may be used as venues for events.

### Events

Events are activities that take place in Yarra's open spaces and require input or a response from Council. Events are activities that may be organised by commercial, community or charitable organisations or by informal networks of people. This discussion paper is concerned with two main types of activity that take place in Council-owned and managed public open public spaces: *planned events* and *unplanned (non-sanctioned or spontaneous) events*.

*Planned events* include any organised activity or gathering that takes place wholly or partly on Council owned or managed property and that requires approval from Council and/or other government agencies (such as Victoria Police). This includes activities in or on roads, footpaths, parks, gardens, reserves and sports grounds, which may or may not be funded by Council and which are organised by individuals or community and commercial operators. Planned events in Yarra include markets, bazaars, fairs, circuses, carnivals, film-shooting, political protests and community celebrations. Because they require a Council or other permit, any activities that meet at least one of the following criteria and are sanctioned by Council are identified as planned events.

The activity:

- involves more than 40 people
- generates music or sound which is audible from the public space boundary
- requires the assembly of structures such as amusements, stages or marquees
- requires the assembly of signage or direction boards
- requires vehicle access into an area in which vehicles are otherwise prohibited (such as in a public space, garden or park)
- involves the sale of food or alcohol
- requires a reservation of space
- generates rubbish
- involves fireworks, buskers, filming or amusement rides and/or
- requires the provision of additional amenities.

All planned events are still subject to the standard venue terms and conditions of the specific road, footpath, park, garden and sports ground where the event or gathering is held. Some examples of existing planned events include the Fairfield Amphitheatre Summer Concert Series, Carols by Candlelight, the Gertrude Street Projection Festival and St Patrick's Irish Day Festival.

*Unplanned* (non-sanctioned and spontaneous) events are organised activities or gatherings that meet one or more of the criteria above, but have not been approved and sanctioned by Council. These events and gatherings may or may not have an organising body.

Unplanned, non-sanctioned or spontaneous events and activity are defined in contrast to private and family events by the fact that they:

- involve more than 40 people
- exclude others from the area
- are likely to impact on the enjoyment of the specific area or nearby areas by others
- potentially damage the physical or ecological space or
- require some form of response from Council.

Family and private events do not require Council involvement and are excluded from the scope of this paper.

### Context for an Events in Public Spaces Policy

The Events in Public Spaces policy will respond to pressure on the city of Yarra arising from rapidly increasing population density. Yarra is one of the smallest municipalities in Victoria, with a population of 85,119 in 2014 and forecast to grow to 117,036 by 2036. As population density increases in Yarra, open spaces provide an important contrast to the congestion of inner city living, so density increases the value of Yarra's public spaces to its residents and businesses. This importance is illustrated by what Yarra residents say they value about open spaces, which includes

(in order of priority) the presence of trees, spaciousness, the ability to relax, a quiet and peaceful environment, and space to socialise.

With growing density, public spaces must accommodate a range of competing interests, including transport thoroughfares for cyclists, pedestrians and vehicles; venues for relaxation, sport and socialisation; commercial events such as markets and fairs; and cultural activities such as outdoor performances and community celebrations. The competing demands on public spaces are also affected by Yarra's diversity. Yarra has a population that is diverse in ethnic and cultural backgrounds, ages and levels of household wealth and disadvantage. Diversity in Yarra means that there is a range of expectations – and sometimes tension – about the purposes to which public spaces are put. The Events in Public Spaces policy must ensure that Yarra's public spaces serve the interests of all its occupants.

It is not only Yarra's own occupants that use and value our public spaces. Yarra is home to public spaces that are prized across Melbourne for their environmental, cultural, heritage and economic significance. For example, the Yarra River and Merri and Darebin creeks, including the land reserves alongside them, provide a corridor for the spread of Indigenous plants and animals and are protected by Environmental Significance Overlays. The Edinburgh and Darling Gardens are significant nineteenth-century heritage landmarks. The Burnley Park Corroboree Tree, Scar trees in Coate Park/Rudder Grange and Studley Park, and the confluence of the Yarra River and Merri Creek are places of cultural significance to Melbourne's Wurundjeri people. The Burnley circus area is Melbourne's major circus site. Roads, public transport routes and bike paths in Yarra are critical to greater Melbourne, serving as thoroughfares for commuters moving across the city.

As well as representing the interests of our residents and businesses, the Events in Public Spaces policy will recognise the City of Yarra's role as custodian of public spaces for Melbourne's greater population and places of cultural and environmental significance to the whole of Melbourne.

### Policy context

The Events in Public Spaces policy will also recognise the importance of public spaces in achieving Council objectives, including those identified in the Council Plan, Arts and Cultural Framework and Open Space Strategy. Public open spaces are important in Council's efforts to make Yarra a more liveable city, which has informed its decision to acquire new public open spaces in past years (such as Church Street and Docker Streets in Richmond). Council aims to make public spaces safe and attractive environments that encourage community interaction and activity. Yarra's Open Space Strategy aims to make public spaces accessible, adaptable, diverse, environmentally sustainable, equitable and valued for their cultural heritage.

Council's commitment to making its decision-making processes user-friendly and accessible to the community will also inform its approach to events in public spaces. Council's Arts and Cultural Strategy aims to achieve clear Council processes and procedures for events and festivals planning, and to develop resources to guide organisations in planning activities that are compliant with Council requirements.

### Current management

Council currently lacks a comprehensive and transparent system for handling unplanned and planned events in the full range of Yarra's public spaces. Over 550 planned events in open spaces were approved by Council in the year 2013-2014. All event organisers complete a three-part booking form. However, event organisers approach different departments of council according to the nature of the event or location proposed, and their request may be processed or declined by that

department. For example, requests for cultural and community events are directed to the Arts and Culture unit, while commercial activities such as new markets may be directed at Economic Development or at Compliance or at Construction Management and protests such as the 'Trains not Tolls' pickets are directed to Communications. The decision to approve or decline a request may be made by individual officers, who interpret venue suitability and potential impact on the site or surrounding area without applying uniform criteria across departments.

Without central coordination, it is difficult for Council to process requests in a timely manner. Once a request is received, it often requires advice from more than one department of Council, depending on the legislative requirements, regulations or permits needed. The involvement of multiple departments can cause delays in processing enquiries and requests. Council needs a centralised approval process that facilitates transparent and timely decision making and provides event organisers with clear guidance in applying for and implementing planned events.

One of the major factors contributing to Council decisions to decline requests is the issue of risk. It is a priority for Council to identify, understand and mitigate against the risks associated with planned events and unplanned events and activity in public spaces. Negative impacts can include damage and vandalism to Council infrastructure and/or locally owned private properties, injury to participants and community members, traffic congestion, compromised parking for residents, pollution and inappropriate behaviour.

However, decisions about granting a request to hold an event should not be unnecessarily stymied when the benefits to Yarra's community outweigh the risks. For example, there is currently considerable demand for use of the Edinburgh Gardens due to its aesthetic appeal, location, amenity and proximity to transport. Council is conscious of the demand this places on residents of the area and takes this into account when assessing applications. However, many of the events declined for the Edinburgh Gardens are consistent with the goals of the Council Plan and are to be encouraged. Council also receives requests for community markets to be held, and often these would necessitate the closure of streets or footpaths. Such opportunities are important to the local economy, as forums for communities to gather together, and as a means of attracting weekend visitors to Yarra. Without a streamlined system for assessing the benefits, costs and risks of such proposals and a fee structure that remunerates Yarra for the use of its public spaces for such purposes and the impact of street closures, Council must occasionally forgo the opportunities such requests present.

## Aims and objectives

In accordance with Council's broader objectives, the proposed aims of the Events in Public Spaces policy are to:

- ensure that the use of public spaces achieves Council's three aims of supporting the Yarra community, making Yarra more liveable and making Yarra more sustainable.
- ensure equity in planned use of public spaces between different interests within Yarra, such as, for example, between:
  - private, commercial and community use
  - use by local community interests and use by outside interests and
  - use for planned events and for spontaneous recreation use that does not require Council intervention.
- achieve vitality in Yarra's public spaces by ensuring that Council responses to demands for use are flexible and efficient.
- protect public open spaces against inappropriate use or over-use.

- ensure conservation of significant cultural and environmental heritage and the character of Yarra's existing open space network.
- maintain high standards of liveability for residents and businesses who use public spaces for both events and passive recreation and relaxation, as well as those who live or work in close proximity to public spaces.
- ensure that events in Yarra's public spaces are aligned with Council policies.

To achieve these aims, the proposed objectives of the Events in Public Spaces policy will be to:

- establish council processes that are responsive to requests for the use of open spaces.
- comprehensively cover all public spaces in Yarra in which events are currently requested or held, including streets, gardens, parks etc.
- present procedures for the efficient processing of requests for the use of public spaces.
- establish procedures to provide adequate information and guidelines for event organisers, encouraging planned as opposed to unplanned events where appropriate.
- ensure that high quality, appropriate infrastructure and amenities in open spaces are maintained.
- establish transparent and fair decision-making processes regarding the uses to which public spaces are put.
- ensure adequate information is provided to residents and businesses potentially affected by the use of open spaces.
- provide processes that minimise the adverse impact of unplanned events in public spaces on the spaces themselves and Yarra's residents, businesses and other identified stakeholders.

## Directions

The directions proposed for an Events in Public Spaces policy are to establish:

### 5.1 A single point of contact for event enquiries, applications and planning responses

Venues and Events would be the key contact responsible for receiving all enquiries and applications for planned events and preparing Council's response to unplanned events.

#### Planned events

Venues and Events would continue to be the point of contact for event organisers throughout the application review process. This involves handling enquiries from Council departments, community members, community or commercial organisations, and stakeholders such as police and emergency services.

Once a request has been received, Venues and Events would:

- determine and provide advice on what permits are required
- conduct an assessment of risk
- where permits are administered by Council, facilitate cross-department collaboration, cooperation and communication to ensure compliance with the Events in Public Spaces policy and other legislative requirements and risk management.
- advise event organisers of the outcome of permit applications and any conditions placed on the event by departments within Council.
- coordinate information sharing on approved events between departments within Council.

By providing a central point of contact, this measure will assist Council to improve the timeliness and transparency of processes for managing enquiries and requests for events in public spaces.

#### Unplanned events

Venues and events will also be responsible for identifying anticipated unplanned events and coordinating a cross-departmental response. This involves:

1. Reviewing the Events and Activity Register biannually to be aware of anticipated dates for unplanned events. Experience shows that there are triggers for high-risk unplanned events in public spaces, including:
  - warm weather on weekends and at night
  - summer public holidays, particularly over long weekends
  - high social media promotion around the event
  - events in neighbouring municipalities that encourage patrons to spill into Yarra's public spaces
  - midweek public holidays in which liquor licencing laws restrict venues opening late, encouraging patrons to celebrate in public spaces.
2. Coordinating a Major Event Control group to prepare a response to unplanned events, with representation from the following departments as appropriate:
  - Arts and Culture
  - Venues and Events
  - Enterprise Risk Management
  - Communications and Customer Service
  - Governance and Compliance

- Parking
  - Engineering Operations
  - Construction Management
  - Statutory Planning
  - Economic Development and Tourism and
  - Community Development.
3. Undertaking a risk assessment, management plan and escalations (if applicable).
  4. Advising Executive of any budget-related matters.
  5. Communicating with external stakeholders.

Having one point of contact will allow Council to approach anticipated unplanned events with a coordinated, efficient response.

## 5.2 A public register of open spaces available for events

To encourage awareness of Yarra's open spaces and their suitability and availability for particular kinds of events, Venues and Events would compile a register of open spaces. The register would include parks, gardens, reserves, and streets and transport routes that are appropriate as temporary event venues. It would also include a profile of each event site, including size, capacity, infrastructure and amenities, proximity to roads and public transport, environmental and cultural sensitivities, current uses, suitability for specific categories of events, a site map and restrictions on use.

The register is designed to improve efficiency in processing requests for events in public spaces by guiding event organisers to appropriate spaces prior to application. The register would also provide a compliance check for Council by containing all relevant information for assessing applications to each public space.

The register is not intended to restrict possible open public space venues to those registered. In particular, organisers may identify non-registered streets or laneways as appropriate venues for markets, protests or film-shoots. In such cases, event organisers would be advised to contact the Venues and Events coordinator to enquire as to suitability and availability of their proposed venue.

It is anticipated that this would provide Council with the opportunity to nominate spaces, where due to their particular characteristics, for which events might be limited or not permitted at all.

## 5.3 Transparent criteria for processing requests

Criteria for assessing requests for events in public spaces will be established and made publicly available. These criteria are based on an assessment of the:

- benefits of proposed events to achieving Council priorities
- costs to the municipality of Yarra and
- risk associated with the proposed event.

### *Benefits*

The benefits of events in public spaces in Yarra are taken into consideration in determining Council's response to requests. Benefits are identified in the event's contribution to efforts to achieve Council's broader objectives by celebrating Yarra's uniqueness, supporting Yarra's community, making Yarra more liveable and ensuring a sustainable Yarra. To assess whether the event benefits Yarra, Council would consider whether the event:

- involves the participation of a proportional quota of Yarra residents



- celebrates a unique and valued aspect of Yarra's culture or landscape
- raises funds that are expended in the local economy
- promotes goods or services produced in Yarra or
- makes Yarra's arts and culture easier for residents to practise and participate in.

### Costs

On some occasions, even while they offer benefits, events in public spaces also have the capacity to infringe upon the activities and comfort of residents and local businesses in a manner that is not consistent with Council objectives by, for example, obstructing trade or preventing the everyday use of public spaces. When this is the case, Council may deem the potential costs of the event to outweigh the benefits to Council priorities, and may decide to decline a request to hold an event.

### Risks

Council will undertake an assessment of risk in relation to all applications for planned events and for anticipated unplanned events on key dates (such as New Year's Eve and Australia Day), as presented in the table below. At any time the risk rating for an event can be upgraded or downgraded depending on the actions in place to mitigate the risk.

Risk Category	Type of event	Example of event or activity with this risk rating	Triggers for risk assessment (event meets one or more of these)
High	Unplanned Planned Planned Unplanned Unplanned	East West Link protests Lunar Festival Johnstone Street Fiesta New Year's Eve party at Edinburgh Gardens Australia Day celebrations at Edinburgh Gardens	Involves road closure(s) Is non-sanctioned Is publicised via social media (making attendance numbers unpredictable) Has the potential to do significant damage to Council or private property.
Medium	Planned Planned Planned Planned	Big Day Not Out Yarra Pubs cricket game St Patrick's Irish Day Festival Emerge Festival Gertrude Street Projection Festival	Involves additional power or water supply Involves assemblage of substantial infrastructure (such as stages, marquees) No. of anticipated attendees may exceed capacity of amenities on site Involves sale of alcohol Noise or music is audible from the event boundary.
Low	Planned  Planned Planned Planned Planned	Fairfield Amphitheatre Summer Concert Series Food Safari Picnic Greek Orthodox Easter Festival Circus Latino Women's Cancer Walk (Kevin Bartlett Inc.)	Site and existing amenities are appropriate to anticipated no. of attendees No sale of alcohol.

Council may decide to grant requests for events in public spaces for medium or high-risk events where those risks are mitigated against and where the benefits to Yarra are regarded to outweigh the potential risks.

The risk triggers above are associated with the following risks and mitigation strategies:

Trigger	Risk	Mitigation
Involves road closure(s)	Poor traffic management may result in injury to members of the public or those attending the event. Congestion in local streets. Compromised parking for residents.	For planned events, an approved traffic management plan, as per Road Occupation permit (Local Law No. 2 and Road Management Act 2004). For unplanned events, the provision of road protection barriers.
Is non-sanctioned	May involve obstruction to traffic, inappropriate behaviour, risks to personal safety or community residents, poor waste management and reputational damage.	A coordinated and planned Council response. Use a mix of police and local laws powers according to anticipated risks. Establish an Emergency Services Unit or an Incident Control Centre.
Is publicised via social media (making attendance numbers large and unpredictable)	May result in large crowds.	Where events are unplanned, monitor social media and media channels for early warnings of activities to determine Council response.
Has the potential to do significant damage to Council or private property.	Vandalism Graffiti Destruction of cultural/environmental heritage assets. Reputational damage	Compliance with the Environment Local Law 3; Section 48AB of the Environment Protection Act 1970, Local Government Act 1989 and Yarra Asset Management Policy. For planned events, Council will work with Victoria Police where appropriate to ensure appropriate number of officers are present.  For unplanned events, Council will use a mix of police and local laws powers for behaviour control.  Establish an Emergency Services Unit or an Incident Control Centre where appropriate.
Involves additional power or water supply	Risk to personal safety of participants from improper installation or inadequate quantity. Potential damage to Council property.	Compliance with the Building Act 1993. Compliance with the Victorian Public Health and Wellbeing Act 2008. Yarra Open Space Lighting Policy.

		Yarra Asset Management Policy. For planned events, event planners are required to submit an operational plan and site layout.
Involves assemblage of substantial infrastructure (such as stages, marquees)	Risk to personal safety of participants from improper installation. Potential damage to Council property.	Compliance with the Building Act 1993.
No. of anticipated attendees exceeds capacity of amenities on site.	Inappropriate behaviour such as urinating in public spaces. Reputational damage.	Existing or brought-in amenities must be sufficient for approval to be granted.
Involves sale of alcohol	Inappropriate behaviour Risks to personal safety of participants or community members.	Compliance with consumption of liquor in public places local law 8 and Liquor Control Reform Act 1998.
Noise or music is audible from the event boundary.	Damage to quality of life for nearby residents. Reputational damage.	Compliance with the State Environmental Protection Policy (Control of Music Noise from Public Premises) and Environmental Local Law no. 3.

#### 5.4 Annual and triennial expression of interest process for major events

Requests for major events require advice from several departments of Council, and are therefore time-consuming to process. This discussion paper proposes an annual and triennial call for expressions of interest (Eoi) to improve both the transparency and efficiency of handling requests for major events. A triennial expression of interest is proposed for recurrent major events, such as Silvers Circus in the Burnley Circus Site. A triennial Eoi will provide a three-year agreement between the City of Yarra and the event organisers to facilitate long-term planning for both parties. An annual Eoi is proposed for one-off events such as a film shoot, and recurrent minor events such as community markets. Several major events are sponsored by Council through its Community Grants. The call for expressions of interest could be timed to coincide with the deadline for Yarra's Community Grant funding process, giving organisers greater capacity to incorporate the use of venues into their plans.

The definition of a major event is subject to discussion, but defined as involving a minimum of 1000 participants, the following current planned events would be considered major events and subject to an Expression of Interest:

Event	No. of participants
Silvers Circus	Several thousand
Fiesta	70,000
Gertrude Street Projection Festival	10,000
Lunar Festival	10,000
Gleadell Street Market	5000 - 8000
The Village	5000
Emerge Festival	2000

Greek Orthodox Easter Festival	2000
St Patricks Day Irish Festival	1000 - 2000
Collingwood Harvest Festival	500 - 1500
The Boite	1000
Where the Heart is	1000
Big Day Not Out	1000

It is likely that interest in using Yarra's open spaces for major events will increase and Council will receive more expressions of interest than those represented above.

#### 5.5 An events in public places fee structure, tailored to the event type

A fee structure may be established in order to charge event organisers for events held in public spaces. The fee structure may be designed according to a combination of the:

- type of event (commercial, community).
- size and scale of event as per attendance (i.e. minor or major event).
- extent to which the event impinges on the everyday use of the area by non-participants. For example, an event requiring exclusive access to a public space would attract a higher fee than one that did not.
- cost to Council associated with level of support it must provide and anticipated remediation. For events for which significant remediation is anticipated, Council may hold a bond.

The aim of the fee scale is not to deter organisers from using Yarra's public spaces, but to provide remuneration or income, as appropriate, where public spaces are used. The fee scale would be determined according to the type and size of event, and the risks and costs to Council and the municipality. Costs are charged per day.

<i>Category 1: Type and size of event</i>		<i>Category 2: Risks to Yarra municipality and costs to Council</i>	
A	Small community	1	Low or medium risk and cost
B	Small commercial	2	High risk and/or high cost.
C	Major community		
D	Major commercial		

#### *Fee structure and examples*

Blue = lowest cost bracket; Pink = moderate cost bracket; Green = highest cost bracket.

<b>A1</b> Fairfield Amphitheatre Summer Concert series.	<b>B1</b> Small film-shoot causing minimal disruption to residents and trade.	<b>C1</b> Collingwood Harvest Festival.	<b>D1</b> Sivers Circus.
<b>A2</b> Small community market involving street closure(s).	<b>B2</b> Film shoot requiring street closures.	<b>C2</b> Johnston Street Fiesta.	<b>D2</b> Large commercial music festival held in a reserve.

The fee structure is designed to improve transparency and equity by providing fee information to event organisers prior to application, and ensuring that Council fees are consistent across events of similar size, type, anticipated costs and risk.

### Potential key indicators

If these directions are adopted by Council, the following proposed measures would indicate the success of the Events in Public Spaces policy:

- Planned events are sustainable in number and size.
- Decisions on requests for the use of open space are achieved within the time limits determined.
- Event organisers express an improved level of satisfaction with Council procedures, as reflected in solicited and unsolicited feedback.
- Venues and Events manages all enquiries and requests for events in public spaces.
- Planned events do not unduly impact on the site in which they are held nor on the residents nearby.
- Organisers of events that are currently unplanned and non-sanctioned are more likely to make use of the Council planning procedures.