
TO:	Committee Officer Planning (Major) Applications Sub-Committee LOCATION: 13 th Floor, 64 Victoria Street
FROM:	Director of Place Shaping and Town Planning
BEING DEALT WITH BY:	Oliver Gibson
EXTENSION:	07971026919
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PLANNING & CITY DEVELOPMENT COMMITTEE – 18 March 2021**Item 5 – Draft Early Community Engagement Guidance**

Paragraph 3.9 of the committee report identifies that at the time the report was drafted consultation on the draft Early Community Engagement Guidance was ongoing. Below is a full summary of the consultation responses received by the end of the closure of the consultation period on 12 March 2021. Text not included in the original committee report is highlighted in blue.

Belgravia Neighbourhood Forum

- Fully support the objectives of this initiative and are in overall support of it but consider there are areas where it does not go far enough.
- Welcome inclusion of neighbourhood forums as bodies that should be consulted by developers.
- Concerned that the asymmetry between the resources available to developers and consultees will remain and suggest measures are recommended in guidance to redress the balance including (i) an independent audit of developer presentations; (ii) an obligation for developers to produce a 'balance sheet' of positives and negatives; and (iii) appointment of a 'community champion' (a professional to represent the communities interests).
- Will remain too easy for developers to ignore community responses. Can guidelines be strengthened to guard against this?
- In Belgravia it is often non-major development that causes most annoyance, disturbance and distress to local residents and therefore guidance should be expanded to cover non-major development.
- Engagement forums will be intensive forms of engagement with limited numbers of participants – how can it be ensured that excessive participants are not included with specific views that dominate the consultation outcome?
- Recommend that more consultation methods are recommended for all development scales in Table 2.
- Impacts on the local community should specifically be addressed in developer presentation materials and information should be provided on how feedback should be acted on by developers.
- Once a Forum has a 'made' Neighbourhood Plan, the Forum needs to have the right to engage with officers to ensure that the policies contained within their plan have been appropriately considered, particularly as the plan will have been endorsed by the community via a referendum.
- Even where the neighbourhood plan is still at draft stage, the community and any advisors they may retain, must have the opportunity for detailed discussions with the relevant council throughout the planning process.

Belgravia Residents Association

- Draft proposal for engagement neither seems to be early, nor does it seem to engage the community very much and suggest following amendments.

- Non-major development should be required to be subject to consultation with leaflets/ mail drop and online communication to residents and business in the area. BRA should continue to receive email alerts to proposals.
- 10+ residential unit schemes should be as per non-major development, plus interactive digital engagement.
- 25+ residential units should be as above but also including early engagement forums.

The Belgravia Society

- Welcome the Council's intention to promote early community engagement and believe there is great benefit in improving the current pre-application engagement process.
- Would like to see improvements to the Council's website to make planning information easier to find and comment on.
- Support the detailed comments made by the Belgravia Neighbourhood Forum.
- Raise concerns over recent consultation on 'Future Victoria', which lack engagement with residents.
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Fitzrovia West Neighbourhood Forum

- Welcome the general principles set out in the guidance of making engagement more effective and meaningful.
- Reporting of outcomes of engagement tends to accentuate the positives.
- Exhibitions and other events tend to be very short and not well advertised.
- Neighbourhood Forums and Amenity Societies should have a bigger role.
- There should be a minimum period for consultation that occurs as early as possible (4-5 days).
- Officers should decide in consultation with the forum/ amenity society which method(s) of engagement should be undertaken by the developer.
- Neighbourhood Forums and Amenity Societies should be engaged prior to other groups.
- Some non-major development (controversial sites, listed buildings, redevelopments in conservation areas) should also be subject to early community engagement.
- Outcome of engagement should be summarised in a report to officers and the forum/ amenity society, plus others submitting written comments for their agreement. The report should also summarise any changes to be made to the plans arising from the consultation and before the full application is submitted.
- Recommendations made on how success of the guidance might be assessed.

Hyde Park Paddington Neighbourhood Forum/ Marble Arch Partnership

- Usability of the guidance could be improved in terms of web links.
- Section on groups should include a helpful narrative about who does what, and where influence lies/the hierarchy of influence (i.e. who amenity societies, neighbourhood forums and BIDs represent and how they function).
- Table 3 should not say 'and/or ward councillors/community' – both should be consulted.

Knightsbridge Neighbourhood Forum

- Ask that the guidance is aligned with KNF's 'Best practice guidance on community engagement': <https://www.knightsbridgeforum.org/best-practice-guidance-community-engagement/>
- Please ask applicants to consult the local amenity society and neighbourhood forum before submitting the application.

- Please ensure that applicants understand that 'made' neighbourhood plans are a full part of the development plan.

Mayfair Forum

- Role of Neighbourhood Forums is understated in the draft guidance, particularly where a neighbourhood plan has been adopted.
- Ask that prior communication with the Form is made a required as a specific engagement event.
- More focus should be included on minor development which can also have impacts and would benefit from community engagement.
- Suggest that all developers of schemes proposing in excess of 100m2 of new floorspace or a change of use should notify forums that have an adopted plan.

Marylebone Forum

- Real concern that neighbourhood forums are not fully embedded into the City Council's consideration on this Guidance and also how they are structured within wider community interest groups and representative bodies in the planning process.
- National Planning Guidance favours local neighbourhood plans and their respective forums, so we are keen to see greater weight on this in the emerging guidance.
- Would welcome an opportunity to review the next iteration of the guidance as a group of Westminster Forums.

Pimlico Neighbourhood Forum

- Forums establish a high-level vision for their area, collect views on what matters most for an area as regards future development, consult on priorities for policy areas, consult on policy proposals and provide binding policy through their plans.
- In light of these roles and responsibilities neighbourhood forums will be in a special position to respond and input on consultations
- Particular weight should be attributed to the views of neighbourhood forums and stronger emphasis on the role that forums play should be included in the guidance.
- Developers should address how proposals meet neighbourhood plan policies.
- Further work is required in the document to explain how developers should demonstrate compliance with City Plan policy objectives when carrying out engagement.

St. Marylebone Society

- Ask for more detail about how early consultation process would work, could this include separate meetings with different parties?
- Note that online methods have been found to increase attendance over the last year.
- Question the value of community consultation after engagement with officers, but note that it local communities bring critical local knowledge in to pre-application discussions.
- Would welcome more consultation with smaller developers.
- Reporting of the outcomes of consultation should be more accurate.
- Questionnaires forcing a positive response should be avoided.
- Acknowledge that it can be difficult to get significant participation from local communities, particularly where people do not feel specifically affected.

Soho Society

- Provided tracked changes to the draft guidance to address the following concerns.

- Initial engagement should occur on the basis of a written concept prior to a developer commissioning an architect or development team to produce a drawn scheme.
- Consultation with immediate neighbours should be prioritised.
- Greater priority should be given in the guidance to engagement on non-major development.
- Table 3 (example timeline) should be simplified and community engagement given greater prominence with table.
- To ensure accuracy and transparency, consulted groups should be asked to agree the minutes or notes taken at engagement events before they are provided in the developer's Early Engagement Strategy or SCI.

The Thorney Island Society

- Welcomes the council's affirmation of the benefits of early community engagement and support the basic principles of the guidance.
- Concerned that the guide promotes good practice but without sanctions for non-compliance.
- Detailed comments made on each section of the guidance in relation to content and structure.
- More focus should be provided on consulting near neighbours and differentiating between statutory and non-statutory consultees.
- Developers should not be able to engage with officers until the first round of community consultation has ended to avoid the implication that officers have already agreed the proposal.
- Developers should agree records of comments at pre-application stage with consultees prior to inclusion in the SCI
- Would like to see early engagement more clearly promoted on smaller, non-major development which is often just as impactful.
- Would like to see pre-application requests made public via the council's Idox online platform (on website).
- It should be made clear that detailed plans should not have been prepared at the time of the initial community engagement.
- Engagement material should show how proposals are compliant with any relevant neighbourhood plan.

Westminster Business Improvement Districts

- Welcome sentiments and principles of the draft guidance, particularly the focus on openness and transparency.
- Welcome identification of BIDs as a key early consultee.
- Greater emphasis should be included in the document on the importance of the planning balance and adopted planning policies so as to manage expectations.
- It should be recognised that there are circumstances where early engagement prior to seeking pre-application advice from officers is not feasible.
- Meetings minutes and advice from officers should remain confidential.
- Do not consider that professional facilitators will improve openness or trust as they will be paid for by the applicant. Suggest instead that consultation material should be shared with officers in advance to ensure it is suitably impartial.
- Ask that BIDs are consulted more formally by the Council on planning and licensing applications.
- Document should highlight importance of engaging with alternative groups such as Youth Forums and employees and workers.
- Additional information should be provided on each of the suggested consultees and a link to a GIS map of the areas they cover provided.

Westminster Property Association

- Recognise the crucial role of meaningful consultation and engagement in successfully managing change in the built environment. Note that this was a key theme of the WPA Insight Paper in 2018, 'Building Trust'.
- Believe that extensive community consultation already occurs on most large and strategic scale development in Westminster but recognise there is always scope for improvement.
- Detailed comments made on the content of the draft guidance, but highlight 5 key recommendations:
 - 1 Launch a pilot based on interim guidance before finalising, so that the framework can be tested and refined with feedback from participants
 - 2 Expand the principles of early engagement to all groups, regardless of whether property, business, resident or amenity, which all consult their local communities
 - 3 The criteria should as flexible as possible so individual site circumstances, not just unit size, can be taken into account
 - 4 Any rigid barrier to dialogue with officer's pre-engagement could be detrimental to bringing forward some schemes, and could cause delay. The option should remain
 - 5 Facilitators may be useful in some instances, but once again flexibility as to if/when to appoint one is important

Victoria BID

- Support early and meaningful engagement for new development.
- Vicinity when referring to the scope of consultation should be defined.
- BIDs should be more clearly promoted as the voice of businesses.
- A lower threshold than 1,000m² should be considered for early community engagement on some types of development.
- Consistency required over how much consultation feedback information is to be provided to different parties.
- The benefits of engaging a professional facilitator should be explained, perhaps with reference to Grosvenor's 'Rebuilding Trust' document.
- List of key information to be included in engagement should be expanded to include flood risk, green infrastructure and biodiversity loss/ gain and details of development costs and returns.
- Detailed comments on the content and structure of the draft document.
- Ask that the Council should be sure it has the resources for officers are able to attend pre-application engagement events.

for Director of Place Shaping and Town Planning