



**City of Westminster**

## **Planning & City Development Committee**

**Date: 25 October 2021**

**Classification: General Release**

**Title: Updated Draft Early Community Engagement Guidance**

**Report of: Director of Place Shaping and Town Planning**

**Financial Summary: None.**

**Report Author and Contact Details: Oliver Gibson, Strategic Planning Officer  
(ogibson@westminster.gov.uk/ 07971026919)**

### **1 Executive Summary**

- 1.1 The initial version of the draft Early Community Engagement guidance published for consultation in spring 2021 sought to address the concerns expressed by local communities in recent years that they are regularly consulted too late in the planning pre-application process by developers, or in some instances not consulted at all. The draft guidance seeks to address these concerns by guiding developers and applicants so that their pre-application engagement with communities occurs at an earlier stage, is more transparent, inclusive and accessible, and is more responsive to the expectations of local communities.
- 1.2 Consultation on the initial draft version of the guidance was undertaken in February and March 2021 and a wide range of responses were received. These are summarised after paragraph 3.6. Irrespective of their perspective or the substance of their detailed comments on the wording of the guidance, all respondents welcomed the principle of introducing guidance that provides greater clarity regarding the expectations for early community engagement on emerging development proposals.
- 1.3 In the period since the end of the initial consultation period officers have reflected on the comments made and further developed the guidance to address the majority of the concerns expressed by consultees. Where concerns have not been addressed through amendments, this is explained in the matrix provided in the background papers. The principal changes to the initial version of the guidance are set out in Section 4 of this report.
- 1.4 Those who engaged with the Council on the initial version of the guidance were notified of the updated version of the draft guidance at the beginning of October. Any additional comments received in response will be reviewed following the end of the notification period and consideration given as to whether further amendments are required prior to publication of a finalised version of the guidance. It is expected that the finalised guidance will be published by the end of November 2021.

## **2 Recommendation**

- 2.1 Members are invited to discuss and comment on the updates made to the draft guidance following the initial consultation phase undertaken in spring 2021.

## **3 Background**

### Aim and Purpose of Guidance

- 3.1 The Government recognises the importance of community engagement in planning. Paragraphs 39 of the National Planning Policy Framework (NPPF) (2021) states that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Paragraph 40 identifies that local planning authorities (LPAs) have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. It notes though that LPAs cannot require developers to engage with other parties, including the local community, prior to submitting a planning application, but they may seek to encourage them to do so where they consider this would add value to the planning process and enhance planning outcomes.
- 3.2 Local communities have consistently raised concerns with councillors and officers that they are regularly consulted too late in the planning pre-application process by developers, or in some instances not consulted at all. Engagement that is currently undertaken often amounts to presentation of a finalised scheme that is submitted shortly after as a formal application without scope for the community engagement to positively influence the proposal.
- 3.3 The purpose of the draft guidance is to ensure that developers are aware of the Council's expectation that community engagement is undertaken as early as possible during the planning pre-application phase using methods that maximise meaningful engagement with all parts of the local community. The guidance also puts in place a mechanism to provide officers with enhanced visibility of views of the local community at pre-application stage, allowing officer advice at this stage to take greater account of local views where these are consistent with the development plan.
- 3.4 The advice in the updated draft guidance note builds upon the expectations and requirements set out in Section 8 of the Statement of Community Involvement (2014), which will be updated later in 2021/early 2022.
- 3.5 All local authorities must have a Statement of Community Involvement (SCI) in order that they comply with Section 18 of the Planning and Compulsory Purchase Act 2004 (as amended). However, SCIs typically focus on how the LPA will act when engaging local communities and other stakeholders in the planning process, rather than seeking to guide developers on how to deliver best practice early engagement on their own development proposals. Some London authorities, such as Lambeth, Lewisham and Southwark do go further and provide more detailed advice for engagement advice to developers, but this is done either within their SCI, on their website or as guidance on how to engage with communities across all local authority service areas (i.e. not guidance that is specific to the planning process). No other Inner London LPA currently has dedicated guidance on planning pre-application engagement for developers and applicants.

## Initial Consultation

- 3.6 Consultation on the initial version of the draft guidance was carried out between 15 February and 12 March 2021 with amenity societies, neighbourhood forums, semi-recognised societies, the Queens Park Community Council (QPCC) and the Westminster Property Association (WPA). Separate discussion forums with the local groups and the WPA were also held during March. The initial version of the guidance was also reported to the Planning and City Development Committee on 18 March 2021.
- 3.7 Below is a summary of all the consultation responses received in response to initial consultation. Full copies of all the responses are provided in the background papers.

### ***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.

### ***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 100m<sup>2</sup> 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.

### ***Notting Hill East Neighbourhood Forum***

- There should be a greater emphasis on neighbourhood forums in this process.
- Agree that the earlier the engagement the better and should be before architectural designs begin.
- Consultation on a site brief rather than a designed scheme is likely to receive a more positive response and allow the community to make more positive suggestions for the development of the site.
- Consider that even small schemes should be subject to early consultations or at least a notice to local community groups. Guidance should apply to all development.
- Collaborative engagement tends to yield the most creative and successful projects.
- Engagement should also include the end user of development or a representative of the end user.
- Suggest use of community notice boards to spread awareness of development proposals.

### ***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

### ***Queens Park Community Council (QPCC)***

- Add 'consultation with parish/community council' to 8.5.

### ***St. Marylebone Society (SMS)***

- 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 local communities bring critical local knowledge into 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 (SS)***

- 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 (TIS)***

- 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.

### ***Victoria BID (VBID)***

- 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 1,000m<sup>2</sup> 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.

### ***Westminster Business Improvement Districts (WBID)***

- 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 (WPA)***

- 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.

### Principal Issues Raised by Respondents

- 3.8 The initial engagement phase has been extremely valuable and has enabled the approach set out in the initially published guidance to be developed and finessed so that it is better aligned with the expectations of communities, whilst providing sufficient flexibility to allow developers and applicants to design their engagement strategies to meet the needs of each development they bring forward.
- 3.9 Whilst a wide range of views were expressed in response to consultation, many of them focus on the detailed wording and/or content of the guidance. The matrix in the background papers identifies how these detailed points have been addressed in the updated version of the guidance. The following main themes were raised consistently across the consultation responses:
- The role of neighbourhood forums and neighbourhood plans is not sufficiently explained in the guidance and the need for development to accord with neighbourhood plans should be better articulated.
  - The guidance should set community engagement and the outcomes that can be achieved by it within the wider context that development must comply with the development plan.
  - Developers should be encouraged to consult with community groups to establish how they can best be engaged with.
  - The scales of development within the scope of development should be amended to include non-major development. Many respondents noted that non-major development can often have greater impacts on neighbouring communities due to these developments often occurring in more sensitive locations.



- Developers should be encouraged to undertake engagement prior to development of detailed drawings (e.g. using a written concept supported by sketches).
- Concern that the use of professional facilitators to run engagement sessions is not always helpful and has a tendency to obstruct the ability of consultees to discuss development proposals directly with the development team (i.e. potentially reducing their ability to influence scheme development).
- Guidance should avoid placing rigid barriers to discussion between developers and officers and should recognise that on occasion there are legitimate reasons (such as commercial confidentiality) where engagement will not be possible prior to initial discussions with officers.
- Reporting of the outcomes of engagement should be more accurate and balanced.
- There should be more recognition that good engagement continues beyond the submission of an application.

#### **4 Considerations – Principal Amendments to Initial Guidance**

##### Overview

- 4.1 As set out in Section 3, the engagement undertaken on the initial version of the guidance in spring 2021 elicited a wide range of responses that have provided a valuable source of guidance from those regularly involved in the engagement process. This has helped officers to make positive and effective changes to improve the guidance. The principal amendments are set out in the following paragraphs in this section, with cross reference to the location of the amendments in the updated draft version of the guidance, which is provided in the background papers in brackets.

##### Enhanced Guidance Formatting

- 4.2 Several respondents identified that the guidance could be improved by making it more accessible and searchable. This has been achieved by adding a contents page and embedding hyperlinks to improve navigation throughout the document (see page 4 of updated draft guidance).

##### Encouraging Developers to adopt their own Engagement Charter/ Set of Principles

- 4.3 It is recognised that there are examples of early engagement good practice, but often this is inconsistent, even across different development teams acting for the same developer on different sites. To address this and help to drive up standards of engagement consistently, the expectation that developers who frequently undertake development in Westminster should publish their own charter or set of principles for community engagement has been added in Section 1. An exemplar of this approach is the Positive Space charter published by Grosvenor in 2020, which is referenced in the appendices of the guidance (see para 1.4 of the updated guidance).

##### Better Recognition of Role of Neighbourhood Forums and Plans

- 4.4 There was widespread concern in the consultation responses from community groups that the importance of neighbourhood forums and their plans to the planning process was not suitably reflected in the initial version of the draft guidance. It is agreed that this was the case and to address this, the updated guidance has been amended to reflect that neighbourhood plans form part of the development plan for Westminster and to identify that neighbourhood forums, irrespective of whether they have an adopted plan, are local groups that are representative of the prevailing expectations

and concerns relating to development in their area. This is articulated in a number of locations throughout the updated guidance and in the glossary of key groups and definitions that has been added to the appendices (see paras 2.3, 3.4 and 5.5 and Appendix B of the updated guidance).

#### Wider Recognition of Groups to be Engaged

- 4.5 The range of groups that developers will be expected to engage with (see para 3.4 of the updated guidance) has been updated to better reflect those groups and individuals present within most local communities. A notable omission in the initial draft was the lack of reference to the need to engage with young people or groups representing young people to ensure the engagement undertaken is inclusive. This has been addressed in the updated version of the draft guidance.

#### Encourage Community Groups to Engage with Officers

- 4.6 Several responses from community groups expressed a desire for greater access to officers to express their opinions regarding development proposals that have been showcased to them by developers. The updated guidance recognises that stronger links and sharing of respective positions between community groups and officers would help to better align officer advice with community expectations of development in future. To facilitate this community groups and individuals are encouraged in the updated guidance to provide their comments on emerging proposals to officers at pre-application stage (see para 3.5 in the updated guidance).

#### 4.7 Scale of Development in Scope Broadened

- 4.8 A significant number of responses, from community groups and the development industry, identified that it is not only major scale development that can have an adverse impact on local communities, either during the construction phase or following completion. Given the nature of the developed townscape that already exists across much of Westminster, it is often non-major development., proposed in close proximity to existing residents and businesses, which can be most impactful.
- 4.9 To address this, the scope of development to which the updated guidance relates has been broadened to include impactful non-major development. To ensure the engagement requirements for smaller forms of development are proportionate, the engagement expectations set out in Table 2 have also been recalibrated (see also para 5.4 of the updated guidance). These changes ensure that the engagement expectations of developers more closely mirror the forms of development that can impact significantly on local communities without overburdening developers of these schemes, such that they won't bring them forward.

#### Community Champion

- 4.10 A number of consultees and Members express the view that they would like to see the introduction of a suitably qualified person to support communities to respond to early engagement, particularly on more complex and large-scale development. The model of the 'Community Champion' within the licensing process in Westminster is often sighted as an example, although it must be recognised that the licensing process operates within a different regulatory regime and therefore the method for funding and

operating a Community Champion within the planning process cannot directly replicate the licensing model.

- 4.11 The approach proposed set out in the updated guidance is that developers of large-scale development proposals (as defined in Table 2) should fund the provision of an appropriately qualified Community Champion to support communities in making representations in response to engagement. The funding set aside by the developer to enable local community groups or individuals to appoint their own Community Champion should be proportionate to the scale of the development proposed and the length and complexity of the engagement process proposed (see para 5.8 and Table 2 of the updated guidance).

#### Delayed Engagement only in Exceptional Circumstances

- 4.12 The Westminster Property Association expressed concern that failing to undertake community engagement prior to seeking pre-application advice from officers should not preclude the pre-application advice service being offered to developers. The wording of the guidance has been amended to make clear that this was not the intention but that instances where engagement has not occurred prior to seeking advice from officers should only occur in the most exceptional circumstances (e.g. where there are significant issues of commercial confidentiality that specifically preclude community engagement prior to the establishment of basic policy principles with officers).
- 4.13 Further wording has been added to note that the advice provided by officers, where there has been little or no substantive community engagement by the end of the officer pre-application discussions, will be more limited and is likely to be caveated subject to the outcome of later community engagement (see paras 6.1 and 6.2 of the updated guidance).

#### Corroboration of Records of Engagement

- 4.14 Many of those consulted who are regularly engaged with on development proposals shared the concern that their views and comments are frequently misrepresented in subsequent developer documentation, such as statements of community involvement. To seek to address this concern and ensure reporting of community expectations is more accurate, the updated guidance recommends that developers should avoid overly prescriptive questionnaires or other closed question-based formats that limit the scope for comment and ensure that the minutes or other records of engagement are agreed with community groups and individuals to ensure accuracy and improve transparency (see paras 5.6 and 6.3 of the updated guidance).

#### Apply Guidance Principles to All Engagement

- 4.15 It was identified in the consultation responses that good community engagement often continues beyond the pre-application stage and into the application and beyond. This may be the case, for example, where material issues are left to be resolved via a planning condition. In such circumstances the principles of good community engagement, as set out in the guidance, should also be applied to engagement that occurs at these later stages (see para 7.3 of the updated guidance).

#### Monitoring

- 4.16 An additional section (new Section 8) has been added to identify that the guidance will be monitored to assess its effectiveness in improving early community engagement. Initial monitoring will focus on operation of a number of pilot schemes in the first year

following publication and analysis of the outcome of the pilots to establish what improvements could be made to the guidance.

### Case Studies

- 4.17 Three recent examples of good pre-application engagement practice have been added to the appendices to provide 'real world' examples of schemes where developers have engaged with communities prior to entering into substantive discussions with officers at pre-application stage. The case studies set out the methodologies utilised across three differing development types and provide developer/applicant analysis of the benefits that the early engagement delivered in each case (see Appendix A of the updated guidance).

### Next Steps

- 4.18 Those who engaged with the Council on the initial version of the guidance were notified of the updated version of the draft guidance at the beginning of October. Any additional comments received in response to this notification will be reviewed following the end of the notification period and consideration given as to whether further amendments are required. Subject to the completion of further amendments, it is expected that the finalised guidance will be published by the end of November 2021 following the outline timetable below:

- Notify those individuals and groups that responded to the initial consultation that the updated draft guidance has been published for comment (2 weeks).
- Report updated draft guidance to the Planning and City Development Committee on 25 October 2021.
- Review responses to re-consultation and PCD Committee minutes (1 weeks).
- Undertake final review and edit of draft document, finalise formatting and Cabinet Member approval of finalised version (3 weeks).
- Launch of finalised guidance (mid/late November).
- Run a pilot studies using the finalised guidance (9-10 months)
- Review guidance in light of pilot scheme findings (Autumn 2022).

## **5 Financial Implications**

- 5.1 None. Any financial implications can be accommodated within existing budgets.

## **6 Legal Implications**

- 6.1 None.

## **7 Conclusion**

- 7.1 The updated draft guidance has been amended to take on board the majority of the views expressed during the initial consultation phase, and this has helped to develop and improve the early engagement process set out in the guidance and the scope of development to which the guidance relates. These main amendments, allied to the other principal amendments discussed in Section 4 of this report, have resulted in a more robust guidance document that has greater consistency with community

expectations, whilst affording sufficient flexibility for developers to tailor their engagement strategies to the requirements of particular development sites.

- 7.2 The Committee is asked to support the principle of the draft guidance and is invited to comment on its updated version of the guidance, drawing on Members own experiences of participation in community engagement.

**If you have any questions about this report, or wish to inspect one of the background papers, please contact: Oliver Gibson (ogibson@westminster.gov.uk / 07971026919)**

**Background Papers:**

1. Consultation Responses & Resultant Amendments Matrix.
2. Updated Draft Early Community Engagement Guidance Note – September 2021.
3. Full copies of all responses to initial consultation carried out in February and March 2021.