




# Consultation Responses & Resultant Amendments Matrix

## Consultees Key:

BNF	Belgravia Neighbourhood Forum
BRA	Belgravia Residents Association
BS	The Belgravia Society
FWNF	Fitzrovia West Neighbourhood Forum
HPPNF	Hyde Park Paddington Neighbourhood Forum
KNF	Knightsbridge Neighbourhood Forum
MBF	Marylebone Forum
MF	Mayfair Forum

NHENF	Notting Hill East Neighbourhood Forum
PNF	Pimlico Neighbourhood Forum
QPCC	Queens Park Community Council
SMS	St. Marylebone Society
SS	Soho Society
TIS	The Thorney Island Society
VBID	Victoria Business Improvement District
WBID	Westminster Business Improvement District
WPA	Westminster Property Association

## Amendments Key:

	Amendment made to guidance to address consultees whole comment.
	Amendment made to guidance to address part of a consultees comment.
	No amendments made. Justification provided for no amendments.

Guidance Section	Respondent	Comment	Officer Response/ Amendment
Contents	HPPNF	Usability of the guidance could be improved in terms of web links.	Weblinks have been added to a newly introduced contents page.
<b>Section 1 – Introduction &amp; Purpose</b>			
(1)	KNF	Guidance should be aligned with KNF’s ‘Best practice guidance on community engagement’.	Guidance is broadly aligned and shares the same principles of early and inclusive engagement. It is necessarily different as this document seeks to encourage engagement across communities and a single community area. KNF link included in appendix.
(1)	WPA	Launch a pilot based on interim guidance before finalising, so that the framework can be tested and refined with feedback from participants.	A pilot will be run on the basis of the updated draft version of the guidance.
(1)	WPA	Extensive community consultation already occurs on most large and strategic scale development in Westminster but recognise there is always scope for improvement.	Text in para 1.2 amended to read more positively and acknowledge presence of existing good practice.
(1)	WPA	Expand the principles of early engagement to all groups, regardless of whether property, business, resident or amenity, which all consult their local communities.	Additional text added to para 1.3 to identify that consultees should reciprocation the principles of good engagement.
(1)	VBID	Developers should also sets out and share their engagement principles (e.g. Grosvenor and its plain English gold standard for public consultation).	Additional text added to para 1.4 to encourage developers to develop and publish their own standards.

<b>Section 2 – What is Early Community Engagement</b>			
(2)	MBF	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.	Reference to neighbourhood plans being part of the development plan has been added in para 2.3 and more info on the role of neighbourhood forums has been added in Section 3 (Who to Consult).
(2)	KNF	Please ensure that applicants understand that 'made' neighbourhood plans are a full part of the development plan.	Reference to neighbourhood plans being part of the development plan has been added in para 2.3.
<b>Section 3 – Who to Consult</b>			
(3)	TIS	We hear reports from residents that they were unaware of proposals affecting neighbouring properties until they received formal notices of submitted planning applications. We believe that those living adjacent or close to a site should be treated as a separate bulleted category.	Wording has been added to the list of consultees (para 3.4) to ensure developers take particular care to consult immediate neighbours.
(3)	TIS	The listing of recommended groups should distinguish statutory and non-statutory consultees.	Purpose of the guidance is not to promote or exclude consultees based on whether they are statutory or non-statutory consultees. Therefore, no changes to wording are proposed, but footnote has been added providing a link to the NPPG list of statutory consultees.
(3)	TIS	The text of Footnote 3 should make clear that it includes residents' associations.	The link and text in Footnote 3 has been updated accordingly and moved to the Appendix C.
(3)	TIS	The 2018 list of Amenity Societies linked in Footnote 3 should be brought up to date and kept up to date in real time on the Council's website.	List of Amenity Societies to be updated separately from the draft guidance.
(3)	TIS	The text should make clear that neighbourhood forums should be consulted, whether neighbourhood plans have been made or not.	Text added to list in para 3.4 to make clear that neighbourhood forums should be consulted irrespective of neighbourhood plan status.
(3)	TIS	Developers should not engage closely with Council officers until the first stage of community consultation has been completed. A common mishap in the current process is the tendency of developers to state or imply that proposals have already been cleared in principle by officers. We feel that some developers use engagement with council officers to short-cut the need to understand local planning policies and the local planning climate.	Guidance makes clear that expectation is for community engagement to shift forward to prior to officer involvement or, at latest, to a stage commensurate with officer pre-application discussions. Therefore, no amendments made.

(3)	TIS	Developers should prepare a short outline proposal in plain English before commencing any consultation meetings, so that all consultees start from the same level of knowledge. It's not uncommon to hear claims that proposals have already been supported by other consultees.	Additional text added in Section 5 (para 5.5) to identify the need for consultation on the basis of a site brief rather than designed scheme where possible.
(3)	TIS	Developers should prepare records of meetings with consultee and should submit them to the consultees for approval before preparing a Statement of Community Involvement.	Additional text added in Section 6 to para 6.3 to identify that consultees should be asked to corroborate outcomes of consultation.
(3)	NHENF	There should be a greater emphasis on neighbourhood forums in this process.	Text added to list in para 3.4 to make clear that neighbourhood forums should be consulted irrespective of neighbourhood plan status. A glossary of different community groups has been added in Appendix C and is signposted by additional text in para 3.4.
(3)	NHENF	Engagement should also include the end user of development or a representative of the end user.	End users will be consulted through well executed early community engagement as the community will often be the users of facilities/ services within the proposed buildings and may occupy future residential accommodation. It is difficult to establish a meaningful approach using representatives of as yet unidentified future occupiers.
(3)	WPA	Suggest, in some cases, other uses of space or facilities, as well as residential communities and those groups listed in on Page 2, should also be consulted. This could include workers, visitors, students or other groups potentially affected by proposals.	Additional text in para 3.3 to include the need to consult of non-residential neighbours in areas of mixed or commercial character.
(3)	WPA	Suggest the reference to "disability positive" is expanded as we are unclear as to whether this is a specific standard. It would be helpful to provide specific examples of how developers can make their engagements disability positive, perhaps with case studies of how this has been done well for existing developments. The council could also point guidance from an independent disability charity or association if appropriate.	Removed reference to 'disability positive' from guidance at para 3.3, as is not a specified standard. Reference to guidance on consultation published by Disability Rights UK has been included in Appendix C.
(3)	HPPNF	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).	A glossary of different community groups has been added in Appendix C and is signposted by additional text in para 3.4.
(3)	PNF	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.	The role of neighbourhood forums, including their role in policy formulation and strategic planning for their area, is now set out in the glossary added in Appendix C.

(3)	WBID	Document should highlight importance of engaging with alternative groups such as Youth Forums and employees and workers.	Youth forums and groups added to the list of consultees at para 3.4. First bullet point in para 3.4 already includes workers and businesses.
(3)	WBID	Additional information should be provided on each of the suggested consultees and a link to a GIS map of the areas they cover provided.	A glossary of different community groups has been added in Appendix C and is signposted by additional text in para 3.4. Glossary includes link to map of the BID areas.
(3)	WPA	There is a complex array of geographically defined groups across the City, reflecting its complex geography. The provision of up-to-date, and perhaps interactive maps, providing contact details of groups such as Business Improvement Districts ('BIDs'), Neighbourhood Forums and Amenity Societies would be a useful tool to assist with pre-application engagement.	Glossary at Appendix C includes links to maps of amenity societies and BID areas.
(3)	KNF	Please ask applicants to consult the local amenity society and neighbourhood forum before submitting the application.	Additional text added in para 3.4 to cross reference to Section 5 and the example timetable.
(3)	SS	Consultation with immediate neighbours should be prioritised.	Additional text to support this contention in the first bullet of para 3.4.
(3)	VBID	Vicinity when referring to the scope of consultation should be defined.	The scope of consultation is dependent on a wide range of site and development variables that cannot be generically defined for all sites within the guidance. Additional text has been added at Footnote 2 to explain this and to direct developers to contact officers where they are unsure about the scope of consultation.
(3)	WPA	To assist developers and communities to provide meaningful engagement strategies, some guidance on the consultation 'catchment' used or recommended by the City Council for consultation on developments could also be included in the document, including the geographical scope of formal statutory consultation that will be undertaken by the City Council once an application is submitted.	The scope of consultation is dependent on a wide range of site and development variables that cannot be generically defined for all sites within the guidance. Additional text has been added at Footnote 2 to explain this and to direct developers to contact officers where they are unsure about the scope of consultation.
(3)	FWNF	Neighbourhood Forums and Amenity Societies should have a bigger role. Neighbourhood Forums and Amenity Societies should be engaged prior to other groups.	Whilst it is agreed that amenity societies and neighbourhood forums should play a key role in community engagement, it is not agreed that they should necessarily be consulted first in every instance. Their role has though been better explained in the glossary added at Appendix C.
(3)	MF	Role of Neighbourhood Forums is understated in the draft guidance, particularly where a neighbourhood plan has been adopted.	The role of neighbourhood forums, including their role in policy formulation and strategic planning for their area, is now set out in the glossary added in Appendix C.

(3)	VBID	BIDs should be more clearly promoted as the voice of businesses.	The glossary added in Appendix C makes the role of BIDs and how they function clearer.
(3)	BNF	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.	Additional text added in new para 3.5 to welcome feedback from consultees of developer led early engagement. Officers welcome the opportunity to receive unfiltered community views.
(3)	QPCC	Add 'consultation with parish/community council' to 8.5.	Not clear from the response where the amendment is recommended. Reference to QPCC is included in Section 3 list of groups to be consulted.
<b>Section 4 – Engagement Methods</b>			
(4)	TIS	There is considerable scope for using existing digital technology to enhance consultation. For example, the idox platform currently used by the Council could be modified to allow anyone who is tracking a particular building, street or postcode to be notified as soon as a developer notifies the Council of an interest to develop (i.e. well before making a pre-app). Likewise, any person who has commented on a previous planning application affecting the same property should be automatically notified.	Publishing pre-application advice on the Council's website would discourage developers from seeking the Council's advice and result in a less collaborative approach. It is also unclear through what process developers could be required to provide details of their proposals prior to them engaging in pre-application discussions. For these reasons this suggestion is not supported.
(4)	TIS	Applications to name or rename public spaces should be recorded using the existing (but unused) facility on the idox platform. Naming and renaming applications should always be regarded as major applications because of their enduring impact on the area.	Street naming and numbering applications are not planning applications and different consultation requirements exist stemming from other legislation. SNN apps are therefore outside of the scope of this planning guidance.
(4)	TIS	In the case of householder development, there is an even simpler method of engagement than Method 1, i.e. a courtesy email, letter, phone call or neighbourly chat to notify those living adjacent or close to a site.	Agreed, additional text regarding more informal pre-application engagement for householders added in paras 5.2 and 5.3.
(4)	TIS	Close involvement of council officers at an early stage is not recommended in relation to Ward Councillor meetings (Method 3).	The involvement of officers in discussions between developers and Ward Councillors is optional on the part of Ward Councillors given the views they express are their own and not that of the Council. No changes recommended.
(4)	FWNF	Officers should decide in consultation with the forum/amenity society which method(s) of engagement should be undertaken by the developer.	Given pre-application engagement is discretionary the developer must determine the engagement method having regard to the guidance and not officers. Additional text added in para 4.3 to

			advise developers to seek advice from consultees on what methods would best enable them to engage.
(4)	MF	Ask that prior communication with the Forum is made a required as a specific engagement event.	It is not reasonable to require prior visibility of proposals by forums or other consultees given pre-application engagement is discretionary. However, additional text has been added in para 4.3 to encourage developers to discuss with groups which form of engagement would best enable them to engage.
(4)	FWNF	Exhibitions and other events tend to be very short and not well advertised.  There should be a minimum period for consultation that occurs as early as possible (4-5 days).	The existing wording in Method 4 identifies the need for appropriate notice of events. Existing text in para 4.5 encourages developers to ensure at least 2 weeks' notice is provided and that events are accessible.
(4)	WPA	The benefits of undertaking small meetings with a variety of individuals or groups, whether in person or online, should be included in the Draft Guidance and added to the list at the end of Section 4. Such forums can be a highly successful forum for engagement with a range of actors. This can include local amenity groups, conservation groups, Residents Associations, or individual consultees. Individual meetings can achieve focused feedback on specific topics or issues and can ensure the views of less well-represented groups are heard (unlike in larger forums). They can also be arranged more easily and practically and allow more people to be involved, at times and in formats that best suit them, rather than requiring them to participate in a set-piece workshop or public meeting.	Additional text added to end of this para 4.6 to recognise that smaller meetings, in addition to the methods specifically identified in the guidance, are permissible and may contribute to the success of the engagement programme.
(4)		BNF - 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?	Additional text added at end of Method 6 to recognise that smaller follow up session with specific groups can be of use to ensure all views are heard.
<b>Section 5 – How to Consult</b>			
(5)	TIS	A clearer and more consistent approach should be taken throughout the document with regard to classification of the scales of development. Recommend the use of only four scales of development, as per the pre-application fees schedule (Householder, all other non-major development, major development and large-scale major development).	The scales of development have been recalibrated in response to this and other comments raising similar issues. Table 2 sets out the different scales of development, which have been reduced to 5 including householder and non-major development.

(5)	TIS	The listing of key information for major development should make clear that detailed plans should not be prepared at this stage as they create the impression that significant professional fees have already been incurred and that there is little inclination to consider amendments as a result of community engagement.	Additional text added in para 5.5 to identify that where possible consultation should occur prior to formation of detailed plans.
(5)	TIS	If the proposal involves the whole or partial demolition of an existing building, the community engagement material must include a statement explaining (a) why it is not possible to retrofit the current building, and (b) how it is proposed to minimise and/or fully offset the embodied carbon cost of constructing the new building, as well as the ongoing carbon footprint of the new building.	Whilst it is agreed that this carbon efficiency information should be shared with consultees (where it will be required at application stage by adopted policy), it is beyond the scope of the guidance to prescribe that this level of detail must be included in all instances.
(5)	TIS	The engagement material should include a statement that the proposal, as defined in outline, is compliant with the relevant neighbourhood plan (if any).	Additional text added to the first bullet point below para 5.5 to require assessment of proposals against neighbourhood plan policies as well as those in the City Plan.
(5)	WPA	Suggest that Table 2 (Engagement Expectations) and Table 3 (Example Process) are reworded to be clear that they are indicative/provide examples of potential consultation routes, but are not intended to be definitive or prescriptive so that consultation arrangements can be tailored to the circumstances of individual sites, achieve the objectives of comprehensive engagement that the guidance sets.	Additional text added to para 5.4 to add flexibility and acknowledge that utilising all methods recommended in Table 2 may not always be achievable and that there may also be instances where the Table 2 recommendations should be exceeded.
(5)	WPA	It will not be practical, in all cases, to show alternative options for the development of the site. Anything shown needs to be commercially and practicably deliverable and not give rise to potential misunderstandings on the extent of change possible.	Additional text added to seventh bullet point below para 5.5 to note that alternatives options for development should only be included in engagement material where they are commercially and practically deliverable.
(5)	WPA	Unclear what category change of use proposals should be considered under for the purposes of interpreting the engagement requirements set out Table 2 (Engagement Expectations).	Change of use proposals have been added to Table 2 as their own category to avoid confusion.
(5)	WPA	This section of the Guidance also recommends the use of Vu City as a modelling tool in engagement. The Guidance should clarify that there are a range of such visualisation tools available and the most appropriate tool or tools for the specific proposal should be used. For example, other programmes or visualisations such as CGIs may better demonstrate the changes and finished nature of a development than Vu City.	Specific reference to use of Vu City has been removed from the main body of the guidance, although the encouragement to use 3D modelling techniques to support engagement remains. Details of the 3D modelling specification preferred by the Council (Vu City) have been moved to Appendix D.



(5)	MF	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.	Agreed that non-major development should be included, but consider the thresholds proposed to be too low/likely to be overly onerous on development with relatively limited impact. Additional text added throughout Section 5 and in footnotes to Table 2 to bring all impactful non-major development within the scope of the guidance.
(5)	TIS	In an area as intensely developed as Central Westminster, it is important to encourage engagement in even small developments because of their potential impact on the appearance and setting of the local neighbourhood, especially on heritage assets.	Agreed. Householder and non-major pre-application engagement expectations are now included in Section 5 for impactful forms of development (paras 5.2 and 5.3 and Table 2).
(5)	NHENF	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.	Agreed. Householder and non-major pre-application engagement expectations are now included in Section 5 for impactful forms of development (paras 5.2 and 5.3 and Table 2).
(5)	VBID	A lower threshold than 1,000m2 should be considered for early community engagement on some types of development.	Agreed. Householder and non-major pre-application engagement expectations are now included in Section 5 for impactful forms of development (paras 5.2 and 5.3 and Table 2).
(5)	VBID	Example of non-major development in Section 5 could be broadened to include examples of office environments and the public realm (only extensions and alterations to houses are mentioned currently) and the council might also wish to set out what the benefits are of engaging with the community on non-major development and the potential dis-benefits of not doing so in the same section.	The examples are specifically included for householder engagement given this is only encouraged and as the methodologies set out earlier in the guidance are likely to be unduly onerous for this scale of development. The benefits of engagement are addressed in Section 2 and these are applicable to all scales of development.
(5)	SS	Request that paragraph referring to engagement on non-major development is moved to a more prominent location within the guidance, perhaps within Section 2.	Disagree that the paragraph should be moved to Section 2 (What is Early Community Engagement) but agree that it should be more prominent within Section 5. Text has therefore been moved to para 5.2.
(5)	SMS	Ask for more detail about how early consultation process would work, could this include separate meetings with different parties?	Flexibility to allow for separate meetings with different parties/groups in addition to the core methodologies set out in Section 4 has been introduced with additional text added to para 4.6.
(5)	BNF	Non-major development should be included as it often causes most annoyance, disturbance and distress.	Agreed. Householder and non-major pre-application engagement expectations are now included in Section 5 for impactful forms of development (paras 5.2 and 5.3 and Table 2).
(5)	BRA	Draft proposal for engagement neither seems to be early, nor does it seem to engage the community very much and suggest following amendments: (1) Non-major development should be required to be subject to consultation with leaflets/ mail drop and	Householder and non-major pre-application engagement expectations are now included in Section 5 for impactful forms of development (paras 5.2 and 5.3 and Table 2). BRA will continue to receive email notifications of formal applications. The



		online communication to residents and business in the area. BRA should continue to receive email alerts to proposals. (2) 10+ residential unit schemes should be as per non-major development, plus interactive digital engagement. (3) 25+ residential units should be as above but also including early engagement forums.	development scale thresholds have been recalibrated to simplify the requirements for majors, albeit the thresholds chosen differ from those recommended by BRA.
(5)	FWNF	Some non-major development (controversial sites, listed buildings, redevelopments in conservation areas) should also be subject to early community engagement.	Agreed. Householder and non-major pre-application engagement expectations are now included in Section 5 for impactful forms of development (paras 5.2 and 5.3 and Table 2).
(5)	SS	Greater priority should be given in the guidance to engagement on non-major development.	Agreed. Householder and non-major pre-application engagement expectations are now included in Section 5 for impactful forms of development (paras 5.2 and 5.3 and Table 2).
(5)	WPA	Note that development of greater potential impact can often be smaller in scale with regard to the floorspace created/the number of units proposed. Example of a small change of use in close proximity to residential neighbours given to evidence this. It is therefore suggested that the guidance should, instead, set the principles that must guide the engagement process, and then provide examples of 'tools', such as media, techniques and pathways, which could be selected and adapted to the context, nature and scale of development, including the likely level of disruption to neighbours. This could be assisted by providing illustrative example developments, setting out the various types of engagement which could be considered proportionate and suitable, to show the reasoning applicants should apply.	The thresholds within Table 2 have been adapted to reflect and acknowledge that it is often non-major development that is more impactful on local communities. Additional text added to para 5.4 to note the need for flexibility in terms of the range of engagement techniques that are utilised. Case Studies have been added in Appendix A to showcase how some of the engagement methodologies have been undertaken.
(5)	BNF	More consultation methods should be recommended for all development scales.	More detail on the form the different methods can take has been included in Section 4. Requiring more engagement methods would be over prescriptive and fail to allow sufficient flexibility.
(5)	BNF	Suggest independent review of developer presentations, obligation to produce a balance sheet of positives and negatives and appointment of a community champion.	Independent review of presentations would be unduly onerous given digressionary nature of pre-application engagement. The requirement for developers to appropriately fund a Community Champion to represent communities on large scale developments has been added to Table 2 and in new para 5.8.
(5)	PNF	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.	Additional text has been added to the first bullet point at 5.5 to reference the need to address compliance with Neighbourhood Plans. The purpose of the guidance is to provide a framework to facilitate earlier, more transparent and responsive developer engagement. Inclusion of detailed guidance on how to

			demonstrate compliance would be overly prescriptive and would not be able to account for site specific circumstances.
(5)	SMS	Questionnaires forcing a positive response should be avoided.	Additional text has been added at para 5.6 to advise that prescriptive feedback formats should be avoided.
(5)	TIS	Engagement material should show how proposals are compliant with any relevant neighbourhood plan.	Additional text has been added to the first bullet point at 5.5 to reference the need to address compliance with Neighbourhood Plans.
(5)	VBID	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.	It is unlikely that these technical considerations will have been fully scoped and resolved at the earliest stage of scheme development so it would be unreasonable to make this an expected element of the engagement information in all cases.
(5)	BNF	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.	Additional text has been added to the third bullet point at 5.5 to reference the need to address the impact on the local community. How the feedback is acted on by developers is dealt with in Section 6.
(5)	WBID	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.	The role of professional facilitators in the engagement process has been amended in response to concerns raised regarding their usefulness. Whilst their use is still recommended, particularly in engagement formats that are looking to scope community principles for a development, greater flexibility has been added regarding when they might be utilised (see updated text in Section 4 and para 5.7). Disagree that officer should review consultation material. This would undermine their impartial role within the planning process.
(5)	WPA	Facilitators may be useful in some instances, but once again flexibility as to if/when to appoint one is important.	The role of professional facilitators in the engagement process has been amended in response to concerns raised regarding their usefulness. Whilst their use is still recommended, particularly in engagement formats that are looking to scope community principles for a development, greater flexibility has been added regarding when they might be utilised (see updated text in Section 4 and para 5.7).
(5)	VBID	The benefits of engaging a professional facilitator should be explained, perhaps with reference to Grosvenor's 'Rebuilding Trust' document.	The role of professional facilitators in the engagement process has been amended in response to concerns raised regarding their usefulness. Whilst their use is still recommended, particularly in engagement formats that are looking to scope community principles for a development, greater flexibility has been added regarding when they might be utilised (see updated text in Section 4 and para 5.7).

(5)	WPA	<p>The Association queries the need for ‘facilitators’ in most cases. This will add unnecessarily to the timescales and complexity involved in undertaking community engagement. Communications consultants, planners and others have a clear track record of undertaking meaningful, inclusive consultation in a variety of formats without the need to bring an additional third party into project teams. In most cases, we consider this to be unnecessary. Ultimately, the facilitator would be paid, provided and prepared by the developer in any case and so would not be entirely separate from the wider consultant team.</p>	<p>The role of professional facilitators in the engagement process has been amended in response to concerns raised regarding their usefulness. Whilst their use is still recommended, particularly in engagement formats that are looking to scope community principles for a development, greater flexibility has been added regarding when they might be utilised (see updated text in Section 4 and para 5.7).</p>
<b>Section 6 – When to Consult</b>			
(6)	TIS	<p>This section is confusing in that it covers three separate topics: (a) community engagement prior to the submission of a request for pre-application advice, (b) the request itself, and (c) Cabinet-level presentations following the submission of the pre-application advice request and the EES.</p>	<p>The perceived complexity is noted but it is important that the timing of early community engagement is explained in the context of other pre-application processes for engaging officers and lead members.</p>
(6)	TIS	<p>In the first bullet point under para 6.3, early community engagement should have been substantially completed in advance of seeking formal pre-application advice from officers.</p>	<p>It is recognised that this will not always be possible, but additional text has been added to this bullet point to make clear that this is the preferred approach.</p>
(6)	WPA	<p>An Early Engagement Strategy (‘EES’) should not automatically be required before entering into pre-application discussions in all cases. The flow chart (Table 3) should be amended. This is a serious concern. Pre-application requests should not be invalidated, or otherwise rejected, where an EES is not provided. This would be likely to lead to further delays and complexity in submitting requests. It would, of course, be open to officers to recommend strongly that early engagement is undertaken.</p> <p>The suggested approach requiring the production of an EES at the very early pre-application stage, setting out the scope and timetable for community engagement, is inflexible and could unnecessarily delay, or further complicate, seeking meaningful engagement with officers on other, technical, matters.</p> <p>There will be some cases where engaging with the community first, before planning and other officers at the City Council, is</p>	<p>The intention in the original draft was not to require an EES prior to officer pre-application discussions could commence, however, it must be recognised that pushing community engagement to an earlier point in the pre-application process is a fundamental pillar of the guidance. Wording has been amended throughout Section 6 to make clear that there is an expectation for details of engagement to be provided at pre-app advice stage, but that this is not an absolute requirement.</p>

		<p>appropriate and beneficial. The recognition that this is acceptable is welcome.</p> <p>Conversely, there will be many proposals whose nature and complexity mean they are driven by technical matters, on which it is appropriate to seek officer advice in advance of consultation. This could include, for example, heritage constraints, complex land use issues, highway matters, or similar. Community consultation can be improved by holding such discussions in the light of feedback on what may be technically feasible.</p> <p>We recognise that, on larger or more complex sites, it will be appropriate to discuss, and agree, consultation and engagement arrangements with officers, and to seek their advice.</p>	
(6)	WPA	<p>Developers and occupiers will also, frequently, be under obligations to respect commercial confidentiality, constraining earlier, wider, discussions. This can often be to ensure staff whose jobs could be affected by a proposed relocation are properly made aware of proposals in advance of wider publication, but this should not prevent some engagement with the City Council.</p> <p>Publishing pre-application responses or feedback from the City Council in the public domain as a matter of course would, therefore, cause concern and is likely to impact negatively on the effectiveness of the pre-application process, which is productive and highly valued.</p>	Additional text has been added in para 6.1 to recognise that there will be examples where commercial confidentiality may prevent earlier community engagement.
(6)	WPA	The potential order of engagement set out in the Draft Guidance should also be considered. In some instances it is suggested, as an example, that engagement with Ward Councillors would occur before any pre-application discussion has taken place with Planning Officers. Given that the starting point for development should be the Development Plan, and the fact there may be various technical considerations to be discussed with the City Council first, it is suggested this should be reconsidered.	Specific references to when engagement with Ward Councillors has been removed from Table 3 to improve flexibility.
(6)	WPA	The Guidance Note should also clarify that, as set out in planning Regulations, engagement is not expected in relation to, for example, development under Permitted Development Rights or	Additional text in para 5.4 and updated format of Table 4 make clear that the guidance is applicable to development requiring planning permission.

		applications for Certificates of lawful use or development. These are examples of some of the processes which are removed from the 'usual' application process by the relevant planning regulations.	
(6)	TIS	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.	Such a rigid approach would risk delaying development and may dissuade developers from consulting with officers at pre-application stage. The guidance will push the majority of community engagement to an earlier point in the scheme development process and this should address the current situation of where communities are given the impression that officers have 'pre-agreed' the principles of development.
(6)	TIS	It should be made clear that detailed plans should not have been prepared at the time of the initial community engagement.	This has been dealt with in the Section 5 where details of what should be included in the consultation papers is set out in para 5.5. The guidance now recommends that a written proposal is preferable to detailed plans as a basis for initial discussion.
	NHENF	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.	This is now recommended in Section 5 in the first bullet point under para 5.5.
(6)	SMS	Question the value of community consultation after engagement with officers but note that local communities bring critical local knowledge into pre-application discussions.	Agreed, the thrust of the guidance is to deliver community engagement earlier, typically prior to engagement with officers.
(6)	SS	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.	This is now recommended in Section 5 in the first bullet point under para 5.5.
(6)	SS	The following sentence suggested prior to 'Table 3': "It is recommended that the first stage of engagement is communication in written form (possibly aided by illustrative sketches) to those in the vicinity describing the vision, aims and objectives of the development and makes clear that the applicant welcomes discussion of the proposals as they are worked up. It is often the underlying principles of applications which create debate. If these can be resolved at the initial stages, the details of subsequent design may well be more easily agreed Table 3 sets out a good practice timetable for community engagement during the scheme development process."	Extracts of this wording have been used in the additional text added to para 5.5.

(6)	WBID	It should be recognised that there are circumstances where early engagement prior to seeking pre-application advice from officers is not feasible.	Additional text added to para 6.2 to make clear there may be exceptions, but that the quality and detail of advice from officers may be affected where no community engagement has occurred.
(6)	WPA	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.	Additional text added to para 6.2 to make clear there may be exceptions, but that the quality and detail of advice from officers may be affected where no community engagement has occurred.
(6)	SS	Table 3 (example timeline) should be simplified and community engagement given greater prominence with table. Suggest putting Community Engagement in the centre and Council on the right as currently it still reads visually as if community engagement comes last. It may also make the arrow flow timeline work better. The need for the differing shapes of the boxes is not clear and can confuse.	Table 3 has been reformatted and amended to address the majority of these observations and make the table and the example timeline it provides simpler and easier to understand.
(6)	HPPNF	Table 3 should not say 'and/or ward councillors/community' – both should be consulted.	Relevant part of Table 3 amended to 'follow up community engagement' which covers both.
(6)	VBID	The activity outlined at section 6, that "Feedback from early community engagement should be shared with officers during the pre-application advice process, either as part of the submitted Early Engagement Strategy (EES) where community engagement has already commenced or as a subsequent addendum to the EES where community engagement is scheduled to take place concurrently with pre-application discussions with officers." is only partly captured within Table 3. Presently it does include the step for EES addendum activity or for community engagement to take place concurrently with pre application discussions with officers.	Table 3 provides an exemplar timeline, so does not promote the undertaking of community engagement later in the process, albeit it is accepted in the text of the guidance that it may occur later in some instances. The title of Table 3 has been amended to make it clearer that it is intended to be an exemplar and not a format to be followed rigidly in all instances. Processes where an EES is submitted after the beginning of the pre-application discussions with officers are adequately described in the text of the guidance.
(6)	VBID	Table 3 is presented as being an "example timeline" though no timings are given. The council might consider including the length of time an applicant or developer can expect to receive feedback from officers.	The timeframe for responses on pre-application requests to officers are prescribed separately in the Council's Pre-Application Charging Schedule so do not need to be duplicated in the guidance. Timings for each stage of the process will vary based on scale and complexity of the development and developer resources, so can't be specified in Table 3.
(6)	VBID	The expected content of the EES set out in bulleted form over pages 10 and 11 is essentially about the applicant or developer reporting to the council how its activities have met or will meet the Community Engagement Protocol. Outside of Table 3 the	The reference to a 'protocol' in Table 3 is intended to be a reference to the Early Engagement Guidance and not another protocol document. The wording in Table 3 has been corrected accordingly.

		Protocol is never mentioned, yet it seems to underpin all community engagement activity.	
(6)	FWNF	Reporting of outcomes of engagement tends to accentuate the positives. 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.	Additional text added to the final bullet point in para 6.3 to note that minutes recording consultee comments should be agreed by consultees. Specifying the format of feedback would fail to afford sufficient flexibility, given the amount of feedback will differ depending on the complexity of the proposal and the level of detail in consultee comments.
(6)	SMS	Reporting of the outcomes of consultation should be more accurate.	Additional text added to the final bullet point in para 6.3 to note that minutes recording consultee comments should be agreed by consultees.
(6)	SS	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.	Additional text added to the final bullet point in para 6.3 to note that minutes recording consultee comments should be agreed by consultees.
(6)	TIS	Developers should agree records of comments at pre-application stage with consultees prior to inclusion in the SCI.	Additional text added to the final bullet point in para 6.3 to note that minutes recording consultee comments should be agreed by consultees.
(6)	VBID	Consistency required over how much consultation feedback information is to be provided to different parties.	Amount of feedback will differ depending on the complexity of the proposal and the level of detail in consultee comments so further specification of what to include in the feedback cannot be included in the guidance. Pilot studies will assist in establishing whether additional guidance is needed on this issue as part of a future update of the document.
<b>Section 7 – What is Expected at Application Stage</b>			
(7)	TIS	Completed Validation Checklists should be published on the planning website.	Validation checklists are published on the Council's website and updated versions are currently being consulted on. Link to Validation Checklists added to footnote on page 18.
(7)	TIS	Concerned that the guide promotes good practice but without sanctions for non-compliance.	Pre-application engagement is a non-statutory activity for developers and therefore we cannot go further and include sanctions for non-compliance. The key to compliance with the guidance is explaining and showcasing to developers the benefits of undertaking earlier and more engaging consultation. Case studies have been added in Appendix A to help to demonstrate the value of early engagement.



(7)	WBID	Greater emphasis should be included in the document on the importance of the planning balance and adopted planning policies so as to manage expectations.	Additional text added to the final bullet point under para 7.1 to reference the need to balance meeting the needs of the local community with the requirement to comply with development plan policies.
(7)	BNF	Will remain too easy for developers to ignore community responses. Can guidelines be strengthened to guard against this?	Pre-application engagement is a non-statutory activity for developers and therefore we cannot go further and include sanctions for non-compliance. The key to compliance with the guidance is explaining and showcasing to developers the benefits of undertaking earlier and more engaging consultation. Case studies have been added in Appendix A to help to demonstrate the value of early engagement. Note also there is a reputational risk for developers where additional content on engagement is to be included in committee reports in future.
(7)	VBID	There is a difference in the extent of feedback to be provided to officers and councillors. For example, the council expects to receive from applicants and developers “a full schedule of the comments/feedback provided by those consulted during each round of engagement” within the Statement of Community Involvement at application stage (p12) whereas only a “summary of feedback” is expected in the community engagement material (p8). It is not clear whether Ward councillors, as part of engagement Method 2, can also be expected to receive a full schedule “of concerns relayed by their local residents” to the developer of their plans or if this is also a summary, so too for the feedback that is to be shared with officers by developers prior to meetings with the Cabinet Member for Business, Licensing and Planning or the Chairman of Planning (p11). We would submit that the extent of feedback shared throughout the application process should be consistent so that discussions are anchored to the same information. Were the council to retain the production of summaries, details of the methodology used to create summaries from feedback should be provided as part of the application process.	The level of detail required at different stages differs as schemes, and likewise the extent of comment on them, will evolve and expand as they progress towards the formal requirements of the planning application stage. Therefore, the differing requirements are not considered to be inconsistent but are instead proportionate to the level of scheme development that will have occurred.
(7)	SS	Suggest following additional sentence at the end of the final bullet under para 7.1: ‘Best practice would be for consulted groups to sign off that the comments/feedback in the SCI represent a fair summary of the points made’.	Additional text added to the final bullet point in para 6.3 to note that minutes recording consultee comments should be agreed by consultees.

(7)	TIS	While the draft paper covers the period from the earliest stage of scheme development to the submission of an application for pre-application advice, good community engagement continues through to the conclusion of the process of determining the submitted application. Engagement may continue even further where material issues are left to be resolved by planning condition. The current consultation should therefore be extended to cover the entire process of community involvement from beginning to end. We would be happy to make comments on the overall process, based on our long involvement in local planning cases.	Agreed. Additional text has been added in new para 7.3 to encourage the use of the principles set out in the guidance to post submission and post permission consultation.
<b>Section 8 – GDPR / Freedom of Information</b>			
(8)	TIS	Given that there is a legal duty under the Freedom of Information Act to disclose any pre-application documentation, public faith in the planning system would be enhanced if all pre-application advice submissions were published on the website (redacted as necessary to protect commercially sensitive information). We are aware of at least one planning authority that publishes such submissions and officer responses.	The council provides pre-application advice on a confidential basis to developers to ensure maximum engagement between developers and the LPA. The Council considers pre-application advice letters to be commercially sensitive and are precluded from release under the FOI Act on this basis. Publishing all pre-application submissions would reduce the amount of developer engagement with officers and consequently risk reducing the extent of development plan compliance in schemes at application stage. The main pillar of the guidance is to shift the mindset of developers to encourage them to share development proposals with communities at an earlier stage such that communities should be aware of emerging development proposals at the same time or earlier than officers.

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