

EARLY COMMUNITY ENGAGEMENT IN WESTMINSTER

**Guidance Note for Applicants and
Developers**

Updated Draft – October 2021



City of Westminster

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Document ID No. 002 V2
E-mail: planningconsultation@westminster.gov.uk
Tel: 020 7641 6000

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1. Introduction and Purpose

- 1.1 The council strongly supports the view expressed by Government in the National Planning Policy Framework (July 2021) (paras 39 and 40) that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Best practice pre-application engagement with the local community at its heart, enables better coordination between public and private resources and improves outcomes for communities and developers by delivering high quality, sustainable development. In essence, it leads to better development, which contributes to better places.
- 1.2 There are widespread examples of good practice early community engagement in Westminster, and a number of these are identified in the case studies included in Appendix A. However, the timing and quality of early engagement can be inconsistent. This guidance sets out our expectations for how applicants and developers can improve community engagement and engage with local communities at the earliest stage of scheme development. It also explains the information applicants should provide to demonstrate the engagement they have undertaken and how it has positively influenced the evolution of their proposals.
- 1.3 The advice in this guidance builds upon the expectations and requirements set out in Section 8 of our Statement of Community Involvement (2014)¹ and explains how public engagement on emerging development proposals should be undertaken by developers following the **principles of good engagement**, namely that it is *early, open, transparent, inclusive, responsive and accessible*. Where engagement has been undertaken in accordance with these principles, it is expected that they will be reciprocated by those that have been engaged.
- 1.4 In addition to following this guidance, developers who frequently undertake development in Westminster are encouraged to develop and publish their own charter or set of principles for community engagement that sets out their pledges for meaningful, practical and popular influence over significant development proposals that they may bring forward in the future. The publications set out in Appendix C are likely to be of assistance when developing an engagement charter or set of principles.

2. What is Early Community Engagement & What are the Benefits?

- 2.1 Early community engagement is the process of engaging with residents, councillors and other local stakeholders at the earliest possible stage in the scheme development process, providing the opportunity for the engagement to be multi-phased, enabling an informed ‘conversation’ with communities rather than notifying them of an already defined proposal. It provides communities with a meaningful role in shaping their places and allows developers to benefit from the insight that communities can provide through their unique local knowledge, test and refine

¹ Statement of Community Involvement in Planning (2014) (note the SCI will be updated in 2021/22): www.westminster.gov.uk/media/document/core-008---statement-of-community-involvement-in-planning

ideas at an early stage and gather support for the general principles of their development proposal. Well executed community engagement following best practice makes the planning process a more positive experience for all participants.

- 2.2 The planning system is often viewed as a complex and highly technical process; it can be confusing, and people can feel that their views are not considered sufficiently when engagement is poorly executed or timed, leading to a breakdown in trust between all parties. Effective well thought out early engagement can reduce conflict, allow communities to have their say at a stage where their views can genuinely influence design decisions and consequently result in better development that is more responsive to local need and resilient to future changes in local behaviour and demand.
- 2.3 Early engagement can also help communities understand the developers' perspective. As the planning process is a quasi-judicial function, planning decisions must be made in accordance with the overall development plan, including its regional, local and, where applicable, neighbourhood plan components, unless material considerations indicate otherwise. Consequently, situations may arise where proposed development may not fully align with local views but is compliant with the development plan. Early community engagement therefore offers a vital opportunity for developers to explain their vision and aims to local communities and demonstrate how they propose to realise these having regard to the development plan and site specific physical and economic constraints. By sharing their vision with local communities in an open, transparent and collaborative way, developers can utilise early engagement to reduce the number and severity of objections raised at formal application stage. This can assist the council to make more timely decisions, and this in turn can help applicants by reducing unnecessary delay and cost.
- 2.4 When done well, early community engagement improves trust and relationships between developers and local communities, building greater overall support for development and a greater appreciation of the positive benefits that can be delivered for existing local communities by well-designed development.

3. Who to Consult – Inclusive Engagement

- 3.1 It is important to engage with as many members of communities affected by proposals, from as diverse a cross section of those communities, as possible. All community engagement must be compliant with the Equality Act 2010 and uphold the values of equality, diversity and inclusion.
- 3.2 Westminster has many long-standing, active community groups and amenity societies who are regularly involved in consultations or community engagement and have made a significant positive contribution to planning in Westminster over many years. However, you should ensure that your engagement reaches all groups within communities, including minority groups and those that are more often disengaged, as well as these more established community groups.
- 3.3 In areas of mixed or more commercial character your engagement should also include non-residential nearby occupiers and groups that represent local commercial or other non-residential interests (e.g. Business Improvement Districts, schools, universities, medical uses etc.). In all cases

you should ensure that your engagement strategy is inclusive of disabled people and avoids barriers to their participation (see further guidance in Appendix C).

3.4 We recommend that as a minimum the groups identified below are included when undertaking early community engagement. Their respective roles in the planning process and how and who they typically represent are explained in more detail in Appendix C. You should also seek advice from local community groups and planning officers who may be able to assist you in identifying additional community stakeholders and help you to understand their particular interests and needs, and how best to engage with them. The expected timing of engagement with these groups is set out in Section 5. Recommended groups for inclusion in early community engagement include:

- local communities including residents, workers and businesses in the vicinity² of the development site, having particular regard to how traditionally ‘rarely heard from’ groups can be engaged (note that care should be taken to ensure that all immediate neighbours have been included in your engagement);
- recognised amenity societies;
- neighbourhood forums (note they should be consulted irrespective of whether they have an adopted Neighbourhood Plan for their area or not)³;
- existing community, residents and tenants’ groups,
- Ward Councillors;
- community councils (Queens Park Community Council – where applicable);
- Business Improvement Districts (BIDs);
- youth forums and groups;
- local faith groups;
- special interest groups (e.g. ‘friends of’ groups, conservation groups etc.) and semi-recognised amenity societies.

In addition to early community engagement, you should also engage with officers using the council’s Pre-Application Advice Service⁴ and consult other relevant statutory⁵ and non-statutory consultees.

3.5 The Council welcomes feedback from all those who have been engaged at an early stage as this enables officers to have a fuller understanding of the community view of emerging development

² ‘Vicinity’ should be determined having regard to the scale and impact of the proposed development and should not be arbitrarily defined by a set distance from the proposed development. You should seek advice from officers where you are unsure whether your scope of consultation is appropriate to the scale and form of the proposed development.

⁴ Pre-Application Advice Service: <https://www.westminster.gov.uk/planning-building-and-environmental-regulations/planning-applications/request-pre-application-planning-advice>

⁵ NPPG table of statutory consultees at planning application stage: www.gov.uk/guidance/consultation-and-pre-decision-matters#Statutory-consultees-on-applications

when discussing proposed development with developers at pre-application stage. Community stakeholders, such as amenity societies or neighbourhood forums, who wish to provide their views on early engagement to the Council should provide them to the Council via the contact details provided in Appendix E.

4. Engagement Methods – Making it Open, Accessible & Meaningful

- 4.1 Early community engagement can take many forms, ranging from awareness raising, for example leaflets, posters, online content/a website, to consultation using questionnaires, interactive social media, public meetings or group discussions and more collaborative and participatory approaches such as design workshops and forums.
- 4.2 Over recent years digital consultation technology and platforms have advanced significantly, and this is reflected by the Government’s call for greater use of digital technology to aid planning consultation, in the 2020 Planning White Paper⁶. Consultation undertaken on the council’s own development proposals demonstrates that digital consultation methods and platforms reach a wider range of people within communities, often from those groups that are disengaged when using more traditional non-digital consultation methods. Typically, a blended approach mixing digital and non-digital methods will ensure engagement reaches the broadest range of participants from across the local community.

Table 1: Types and Methods of Engagement.

Engagement Type	Engagement Methods
Informative Engagement	Leaflets and traditional media
	Development website/council’s website/ social media (where informative with no interaction)
Consultative Engagement	Interactive digital engagement/social media (where interaction is included)/ online questionnaires
	Public exhibitions/ meetings
	Meeting(s) with Ward Members & other statutory/ non-statutory consultees
Collaborative Engagement	Engagement forums/ workshops

- 4.3 For major development you should use some or all of these techniques depending on scale of development (see Table 2), and you should include a mix of techniques to ensure your

⁶ Government Planning White Paper ‘Planning for the Future’ (August 2020): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf

engagement is inclusive and reaches different audiences and communities within the vicinity of the development site. However, it is important to tailor the engagement approach taken on a case-by-case basis to ensure the barriers to participation that may exist in different communities are overcome. It will often be beneficial to contact community groups in advance of formal engagement to establish which formats/engagement methods they consider would best enable them to engage with the development proposal. Note that some groups have their own guidance for pre-application engagement.

- 4.4 When planning early community engagement, you should identify any potential barriers to engagement and design your engagement strategy to minimise them where possible. There are groups in all communities who are more difficult to engage with. Potential barriers to their involvement include: (i) the capacity and ability of different stakeholders (e.g. visible and non-visible disability, childcare/caring commitments or employment commitments); (ii) being members of typically 'rarely heard from' groups such as young people, older people, minority groups or socially excluded groups; (iii) those with limited computer literacy and/or access to technology; and (iv) those with more limited literacy and/or numeracy or a dominance of oral culture. Ensuring that an engagement strategy is inclusive and accessible to the widest range of community members contributes to its value and legitimacy.
- 4.5 A minimum of 2 weeks' notice of engagement events should be given. For all forms of participatory engagement, you should ensure that multiple sessions are scheduled at different times during the day to maximise participation. For engagement events held at a venue in the vicinity of a development site you must ensure the chosen venue is fully accessible and inclusive. You should consider whether the use of non-traditional venues would assist in reaching disengaged groups. Venues that can provide appropriate audio or visual aids should be prioritised.
- 4.6 It is recommended that the types and methods of engagement included in Table 1 are designed in accordance with the example methodologies outlined below. However, it should be noted that this does not preclude developers from pursuing a more bespoke approach where this would respond to the particular needs of the local community and would lead to enhanced engagement outcomes. For example, in addition to the core methods described below developers may also wish to undertake smaller meetings with a variety of individuals or groups, which can deliver more focused feedback on specific topics or issues and can ensure the views of less well-represented groups are heard.

Method 1: Leaflets/ Use of Traditional Media & Development Information Website

Written and/or email correspondence, newsletters, leaflets and/or a website setting out the key aspects of a proposed development (see Section 5 for expected content) and advising where further information can be obtained and, for larger developments, where comments can be made (i.e. by reference to an informative website/public exhibition/engagement event etc.).

Method 2: Interactive Digital Engagement

Use of an interactive website and/or digital engagement/social media platforms to provide detailed information on the proposed development and key objectives for the site, and provision

of the opportunity to comment (i.e. by use of online questionnaires, surveys, comments portal or similar). Method 2 may incorporate the use of new technologies/interactive features and 3D modelling. It may also include digital online forums and exhibitions.

Where targeted online consultation is utilised, the parameters for consultation (i.e. the geographic and demographic profile of those targeted etc.) should be arrived at with the aim of ensuring the consultation is inclusive of all communities within the vicinity of the development site and for the purpose of transparency and openness, these parameters should be specified in the Early Engagement Strategy submitted at pre-application stage and the SCI submitted at application stage.

Method 3: Meeting(s) with Ward Councillors

Meeting with a Ward Councillor(s) specifically arranged for the purpose of discussing the development proposal and setting out any concerns relayed by their local residents. Developers should notify officers where a meeting has been arranged with a Ward Councillor(s). Ward Councillors may invite officers to attend the meeting*. The use of new technologies and 3D modelling should be used for these meetings, where appropriate, to help articulate the development proposals.

**Note that officers are not required to attend as the views expressed by Ward Councillors are their own and are not representative of the council as Local Planning Authority.*

Method 4: Public Exhibition/ Consultation Event/ Drop In Session

A public event held be at a venue in the immediate vicinity of the development site where visual displays of the proposed development are provided, with the opportunity for the public to comment on the proposed development. Such events should be appropriately publicised in advance (including use of Method 1).

Digital alternatives to 'in person' events should also be considered and may help to reach a wider range of persons from the local community. A digital format could take the form of a webinar, which enables the presentation of the same material as could be presented in a physical space and also enables comments to be made via a question and answer session, and via follow up email, online/social media or phone correspondence.

You may wish to appoint a professional facilitator⁷ to compile consultation materials, organise the format for collecting consultee's views and lead engagement with the public at the event. Officers should be invited to the event in an observational capacity. All feedback should be provided to officers following the event to inform their advice in response to pre-application advice requests.

⁷ 'Professional Facilitator' means a person or persons appointed by the developer outside of their retained development team (i.e. appointed specifically to manage and host engagement events and not retained for the purpose of handling on-going development proposal communications), who has relevant professional experience in advising on consultation content and facilitating community engagement on development proposals.

Method 5: Workshops

Workshops are a more collaborative approach to engagement than public exhibitions and consultation events. Workshops typically provide attendees with greater scope to offer their opinions on the form and function of a proposed development.

Workshops can be held at a venue in the immediate vicinity of the development site or online and publicised in advance. They are likely to be more effective when held during the earliest stages of scheme development and are typically more productive when limited to a specified number of attendees that represent a cross section of all parts of the local community. Consideration should be given to the use of professional facilitators to prepare workshop materials, set discussion topics and questions and lead the workshop session. Officers should be invited to workshops in an observational capacity.

You may wish to consider livestreaming or making recordings of workshops available online for those unable to attend (i.e. where attendee numbers may have been limited to maintain the effectiveness of the session) and provide alternative online method of submitting feedback to broaden the reach of these events.

Method 6: Engagement Forums

Engagement Forums (EFs) are more structured interactive events attended by local community stakeholders, to which Ward Councillors may also be invited. EFs would normally be appropriate when developing schemes of more strategic scale and the thresholds set out in Table 2 reflect this. EFs should be organised by a developer's professional team, or on their behalf by a professional facilitator, and held at an appropriate venue in the vicinity of the development site. EFs should typically last 2 to 2.5 hours and comprise a concise introduction of the site and key facts regarding the proposed development.

Officers should be invited to EFs. Note that their involvement will be as impartial observers and they will not provide comment on the acceptability of the proposal to the developer or other attendees. Officers may provide an overview of the policy context for the site being discussed.

The session should conclude with a forum discussion and a question and answer session between the developer and attendees. You should ensure that the developer presentation is limited to not more than 30 minutes to ensure sufficient time for open and unconstrained discussion between participants. The developer should take minutes of the EF and these should be shared with and agreed with attendees, including the attending officer. Alternatively, a recording of the EF may be made and shared where appropriate consent has been received from all attendees. The attending officer will use the record of the EF discussions to inform subsequent written pre-application advice.

Like workshop events, EFs may also be undertaken in a remote format, particularly in circumstances where in-person events are not possible or practical. You may wish to consider livestreaming or making recordings of EFs available online for those unable to attend and provide alternative online method of submitting feedback to broaden the reach of these events.

It may often be beneficial to hold smaller subsequent engagement sessions with specific groups or sections of the community to ensure the views of all participants are fully captured.

- 4.7 Should a local or national emergency be declared that prevents the carrying out of face-to-face engagement, such as the Coronavirus pandemic, digital and online versions of these engagement methods should be utilised rather than reducing or ceasing community engagement during the affected period.

5. How to Consult – Types of Engagement, Content & Techniques

- 5.1 For major development, the council's Statement of Community Involvement in Planning sets the expectation that all applicants/developers will engage with the local community prior to making a formal application. For larger proposals, which are likely to have a significant impact on the environment or on the local community and/or generate a high level of significant local interest, it is especially important to undertake early consultation on a wider scale.
- 5.2 Where non-major development would have a significant impact, early engagement is encouraged. The engagement undertaken should be proportionate to the scale and impact of the proposed development. For all scales of development, it is important to consider how you would want to be treated if a development was proposed near you.
- 5.3 Early engagement is also encouraged for householder development. Householders carrying out development (such as extensions and alterations to houses), are encouraged to consult those living adjacent or very close to the site at an early stage. The type of engagement recommended may include, but should not necessarily be limited to, written notice of the proposals and/or offering a meeting with neighbours to enable them to comment on your proposals prior to submission of a formal application.
- 5.4 Table 2 sets out the early community engagement expectations for different scales of development that require planning permission. It is recognised that there will be limited instances where carrying out all of the recommended engagement may not be appropriate or achievable. Where the proposed development would have more significant impacts than would typically be expected from development of a similar scale, developers are encouraged to exceed these expectations in Table 2 where this would enhance the value of the community engagement.

Table 2: Early Community Engagement expectations for developers.

Method/Action	Householder Development	Non-Major Development (less than 1,000m ² add. floorspace or 10 new residential units)	Changes of Use (all proposals where no additional floorspace proposed)	Major Development (1,000-9,999m ² add. floorspace or 10-49 new residential units)	Large-Scale Major Development (10,000m ² or more add. floorspace or 50 or more residential units)
Expected Developer Engagement Format(s)					
	Method 1: Leaflets/ online communication.	Encouraged	✓**	✓***	✓
	Method 2: Interactive Digital Engagement		✓**	✓***	✓
	Method 3: Meet Ward Councillor(s)****			✓***	✓
	Method 4 or 5: Public Exhibition/ Workshop			✓	✓
	Method 6: Early Engagement Forum				✓
	Community Champion				✓
Expected Collaboration with Officers					
	Submit Early Engagement Strategy with Pre-App			✓	✓
	Share Consultation Responses/ Data			✓	✓
	Invite case officer to engagement event(s)				✓

* GIA Floorspace refers to additional floorspace in the case of proposals for extensions and all floorspace for new buildings (including new build schemes behind a retained façade).

** Method 1 & 2 engagement expected for non-major development where the development itself or the scale of construction work would have a significant impact on neighbouring occupiers.

*** Method 1, 2 & 3 engagement expected for changes of use not creating new floorspace where the proposal may have a significant impact on residential amenity (e.g. proposals for new pubs or bars or other larger restaurant or entertainment uses).

**** Meetings are subject to the agreement of the Ward Councillor⁸. Note Ward Councillors are not obliged to meet to discuss all development proposals and meetings are at therefore at the discretion of individual Ward Councillors.

5.5 To maximise the benefit of engagement, where possible initial engagement should be undertaken on the basis of a written concept, vision and set of objectives for the proposed development, supported by illustrative sketches where necessary. It is recognised though that there will be circumstances when early community engagement on more developed schemes is appropriate.

⁸ List of ward councillors: <https://committees.westminster.gov.uk/mgMemberIndex.aspx?bcr=1>

When carrying out all methods of engagement for major development, a minimum level of key information regarding the proposed development should be included in the community engagement material:

- the vision for the proposed development and how this contributes to achieving the relevant policy objectives in the City Plan and the neighbourhood plan (where relevant);
- site layout and details of the use, function and form of proposed development (interactive and/ or 3D modelling should be used wherever possible – see Appendix D);
- identified positive and adverse impacts of the development, including the impact on the amenity of neighbouring occupiers, the impact on the local highway network, and its contribution to tackling the climate emergency⁹ and improving the sustainability of the city's building stock;
- the S106 and other public benefits to be offered (where applicable);
- the value of any CIL contribution (where applicable);
- an outline timeline for delivery of the proposed development and how any foreseeable significant construction impacts could be mitigated;
- alternative options for development of the site (at initial engagement sessions, where alternative proposals are commercially and practicably deliverable);
- summary of feedback from earlier consultation, amendments to earlier scheme iterations and rationale for amendments (at follow up engagement sessions);
- details of how feedback can be given during and following the engagement event.

5.6 When collecting feedback from those that have been engaged overly prescriptive questionnaires or other closed question-based formats that limit the scope for comment should be avoided.

5.7 As identified in the engagement methodologies earlier in Section 4, professional facilitators may be appointed to assist with undertaking engagement. The use of professional facilitators, who are outside of the retained development team, can help to ensure that the presentation material, engagement format, questions to participants are more balanced and impartial and ensure engagement is less adversarial. Professional facilitators are likely to be of greatest value when consulting at the earliest stage on conceptual development proposals.

5.8 When engaging on large-scale major development and/or when developing a charter or set of principles for community engagement, developers should consider funding an independent appropriately qualified planning professional¹⁰ to act as a community champion, representing the views of the local community. Community champions can help communities to identify their primary views and concerns, ensure their views are clearly articulated and assist with negotiation where areas of concern can be resolved. Community champions should be selected and appointed by the community they are to represent, and funding allocated by developers should

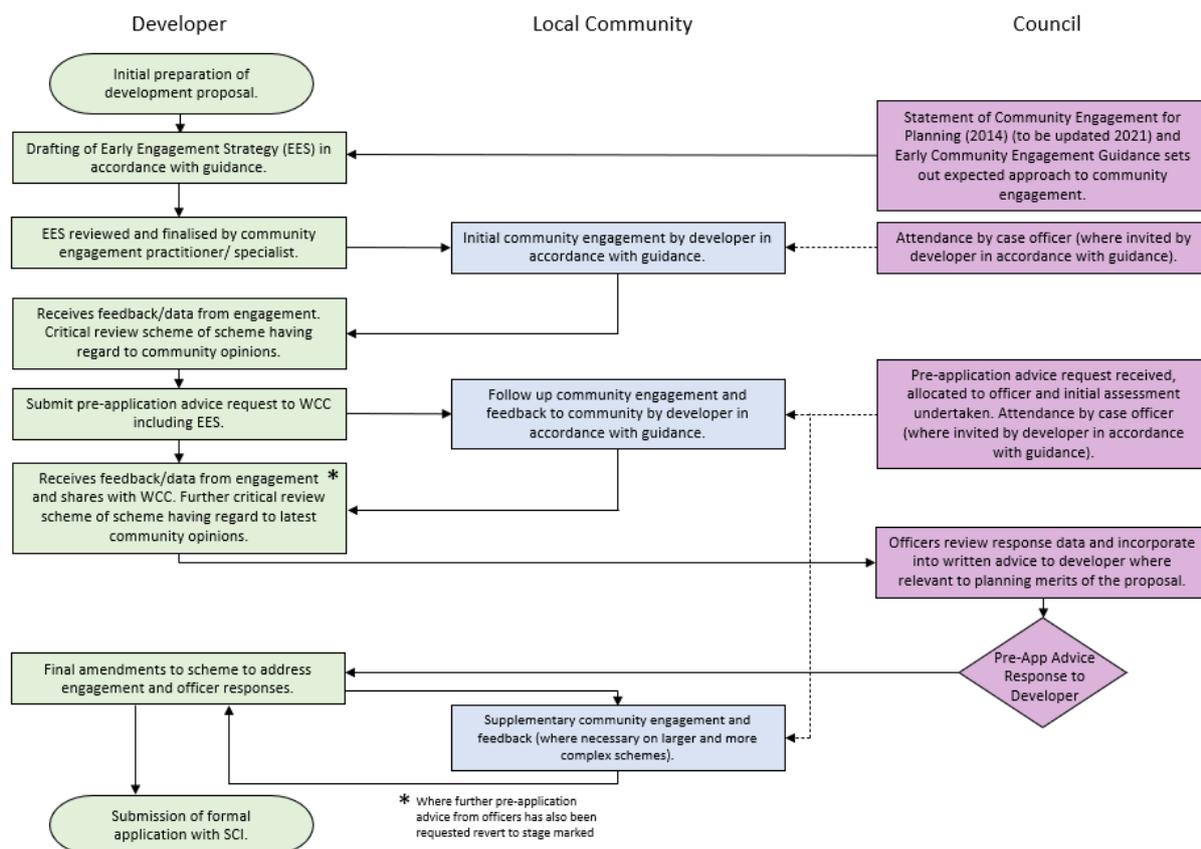
⁹ Westminster's Climate Emergency declaration: www.westminster.gov.uk/climate-emergency

¹⁰ An appropriately qualified planning professional should be a member of the Royal Town Planning Institute.

be proportionate to the scale of the development and associated engagement exercise to which the community is being asked to respond.

6. When to Consult – Early & Responsive Engagement

- 6.1 Community engagement should begin at the very earliest stage of scheme development. Table 3 sets out a good practice timetable for community engagement during the scheme development process. Following this timetable will ensure that the early engagement undertaken informs the design of the scheme and enables pre-application discussions and subsequent advice from officers to be better informed by the views and expectations of the local community. We expect that initial community engagement will be carried out prior to seeking pre-application advice from officers, especially on larger schemes and those where more than two phases of community engagement are planned, unless there are exceptional site-specific circumstances to justify otherwise. Where exceptional circumstances arise that preclude the timetable in Table 3 being followed, you must still ensure that community engagement occurs at a point in the scheme development process where changes can be made in response to feedback received from the community.
- 6.2 The scope and timetable for the proposed community engagement activities should be captured in an 'Early Engagement Strategy' (EES). The EES should be submitted along with other documents when making a pre-application advice request to the council. Feedback from early community engagement should be shared with officers during the pre-application advice process, either as part of the submitted EES or as a subsequent addendum to the EES where community engagement is scheduled to take place concurrently with pre-application discussions with officers. Officers may include reference to relevant comments and views expressed by the local community in their written pre-application advice where these are consistent the policy requirements of the development plan. Note that seeking advice from officers without first undertaking early community engagement is not precluded. However, where community engagement has not occurred first, the advice you receive from officers may be more limited and is likely to be caveated subject to the outcome of later community engagement.

Table 3: Exemplar Early Community Engagement Process & Example Timetable

6.3 Where required as part of a pre-application advice request, an EES should set out the following information demonstrating how early community engagement has/will be undertaken:

- **What engagement has already been undertaken?** Early community engagement should start well in advance of seeking pre-application advice and should be substantially complete in most instances. Therefore, you should include details of all early community engagement that has already been undertaken prior to the submission of the pre-application advice request, including community feedback from this engagement. All comments received should be included within an appendix to the EES.
- **Who will you engage with?** You should demonstrate the scope of community engagement proposed by including a list of community groups and other statutory and non-statutory consultees that have/ are to be consulted and provide a statement or methodology setting out how the engagement will encompass the principles of good engagement (see Section 1).
- **How will they be engaged?** Confirmation of which methods will be used with reference to Table 2. The EES should specify how many phases of consultation are proposed and how feedback on earlier engagement is to be provided to stakeholders.
- **How will you ensure engagement is constructive, accessible and inclusive?** Where possible media/presentation content for the initial round of engagement should be provided in an appendix. For traditional and digital methods of consultative engagement,

the questions to be asked of consultees should be provided and a rationale for the proposed approach provided. For digital/social media consultation, where particular demographics or geographic areas are to be targeted, these should be set out and a rationale for the proposed approach given.

- **When will you carry out engagement?** A schedule for initial and follow-up engagement should be provided (note it is recognised that the date of follow up consultation may be subject to change).
- **How will you capture, record and share feedback?** Provide a methodology for how comments and feedback will be captured and recorded and confirm the format and timeframe for sharing the feedback with officers and community stakeholders. To ensure accuracy and transparency consultees should be asked to agree the minutes or notes taken at engagement events before their comments are included in an EES or SCI. You should also confirm that the comments and any associated personal data has/ will be captured with appropriate consents (where necessary).

- 6.4 Where community engagement is carried out prior to seeking pre-application advice from officers (as recommended in Table 3), and this guidance recommends attendance at the engagement event by officers, you should contact the relevant planning area team (see contact details in Appendix E).
- 6.5 Further views should be sought on the evolving proposals from all those who respond to initial engagement before a planning application is submitted, so that amendments that have been made can be communicated to the community. This approach helps to build trust and enhance transparency in the planning process and enables the community to see that their input has resulted in tangible public benefits. Conversely where changes to a scheme cannot reasonably be made, further engagement enables developers to set out why this cannot be achieved in advance of formal consultation at application stage. For larger scale major development, it is likely that more than two phases of community engagement will be appropriate to secure the best outcomes.
- 6.6 In addition to the steps set out in Table 3, developers of larger scale major development may also wish to present their emerging proposals to the Cabinet Member for Business, Licensing and Planning and/ or the Chairman of Planning (as appropriate) where the development is of a scale or complexity described in Appendix A of the 'Pre-application Engagement with the Cabinet Member for Business and Planning and the Chairman of Planning – Guidance Note'¹¹. In addition to falling within one of the categories in Appendix A, developers must also demonstrate that they have already made a pre-application advice submission to the council and provide evidence of initial community engagement (i.e. by the submission of an EES with their pre-application advice request). Feedback from the community engagement should be shared with officers in advance of a meeting with the Cabinet Member or the Chairman of Planning.

¹¹ Pre-application Engagement with the Cabinet Member for Business and Planning and the Chairman of Planning – Guidance Note: www.westminster.gov.uk/media/document/cab-memberandcop-meetings-guidance-notedec2020-finalpdf

7. What is Expected at Application Stage – Promoting Transparency

7.1 Where an applicant has undertaken community engagement prior to making a planning application, a Statement of Community Involvement (SCI) must be submitted with a formal planning application in accordance with our Validation Checklist¹² requirements. The SCI should build on the content provided in the EES at pre-application stage. It must set out the type of community engagement undertaken and the success of these methods, along with details of the views expressed and the changes made by the applicant in response. Where no changes have been made, the SCI should explain why not. You will need to consider how you can demonstrate measurable community representation and support for the proposal. The SCI should follow the outline format set out below:

- Identify the scope of community engagement expected by this guidance note and explain how this has been achieved.
- Details of the engagement methods that have been utilised to meet the expected scope of engagement (Table 2) and provision of data to demonstrate the reach and inclusivity achieved using the chosen methods of engagement.
- Provision of a schedule/timeline of when the engagement was undertaken relative to other milestones such as engagement with officers and/or councillors and application submission.
- Provision of a full schedule of the comments/feedback provided by those consulted during each round of engagement and how the scheme has been amended to address these, having regard to the need to accord with development plan policies. Where no amendments were made, the decision not to amend the scheme should be similarly justified/a rationale given.

7.2 Where an application is reported to a Planning Applications Sub-Committee for determination the submitted SCI will be used to inform a section of the report outlining the engagement that the applicant has undertaken with the local community and how this engagement has contributed to the finalised design of the proposed development.

7.3 It is important to note that good community engagement continues beyond the point of submission of a formal planning application. Continued engagement during the course of a planning application may be appropriate where this complements the council's own formal consultation processes. Engagement often continues post permission being granted, for example, where details of a particular aspect of a development are reserved by a planning condition or

¹² Validation Checklists: www.westminster.gov.uk/planning-building-and-environmental-regulations/planning-applications/making-planning-application/validation-requirements

where impactful construction works are required to implement a permission¹³. You should ensure that the principles set out in this guidance are also applied to engagement undertaken at any stage during the application and post permission stages of the planning process.

8. Monitoring

- 8.1 This guidance will be subject to ongoing monitoring to assess its effectiveness in delivering development that is more responsive to the expectations of the communities in which new development is located.
- 8.2 Following initial publication of the guidance, the Council will invite developers to nominate schemes to take part in a programme of case studies, which will assess the effectiveness and success of the engagement framework set out in the guidance. Insight and findings from the pilot studies will inform an initial annual review of the guidance.
- 8.3 Subsequent annual review of the guidance will assess the outcomes of development permitted during the preceding 12 months, having regard to the extent to which development has evolved in response to engagement to deliver the expectations expressed by communities.

9. GDPR / Freedom of Information

- 9.1 The City Council may be under a legal duty to disclose any pre-application documentation or correspondence if it receives a Freedom of Information request. In light of this, if you consider that any information disclosed as part of the pre-application process is commercially sensitive you must confirm this to the City Council in writing. However, please note that the City Council can only withhold information if it falls within one of the statutory exemptions and, whilst it will take your representations into account, it is ultimately the City Council's decision as to whether information should be withheld.
- 9.2 The City Council operates in full compliance with GDPR and will not disclose any personal information to third parties. Further information, including the Planning Privacy Notice, is provided on the council's website at the following link: www.westminster.gov.uk/data-protection.

¹³ Further guidance on engagement during construction works is provided in our Code of Construction Practice: www.westminster.gov.uk/code-construction-practice.

Appendix A – Case Studies

Case Study A – Grosvenor Square Gardens

Developer: Grosvenor Britain & Ireland

Architect/Agent: Tonkin Liu

Engagement Lead: Grosvenor Britain & Ireland

Current Status: Pre-application engagement ongoing

Early Engagement on Changes to a Public Open Space

Grosvenor are currently exploring proposals to transform Grosvenor Square Gardens, so that it becomes a space that works harder in future for nature and the wellbeing of its users. Their aim is to achieve this by developing their proposals collaboratively via an exemplar community engagement programme that reaches both local, London wide and specialist interest audiences. The programme follows the principles set out in Grosvenor's recently launched Community Charter called 'Positive Space', which are 'listen first', 'open up', 'make it easier' and 'be accountable'.

The initial phase of Grosvenor's engagement approach sought to understand the community priorities for Grosvenor Square. These then formed criteria which the design proposals could be tested against and held accountable to.

Initial community engagement was undertaken prior to engagement with officers during the period impacted by the pandemic. Consequently, engagement was focused on online activities for larger-scale audiences, with socially distanced physical activities for small groups only occurring when guidance allowed for them.

To ensure the engagement was inclusive, local input was sought on the programme's activities by sharing the engagement plan and stakeholder mapping with community stakeholders. This enabled a range of activities to be devised to engage local communities as well as those from across London. To date, the engagement programme has included:

- **1:1s with key stakeholders** using a conversation framework to enable feedback and identify key priorities at an early stage.
- **Virtual workshops** comprising 'Big Topic Talks' with expert speakers to expand on the themes at the heart of the re-design and 'Local Conversations' for more in-depth conversations with the design team.
- **Printed workshop packs** were provided to people in advance and to people who wanted to participate by phone only.
- **Outdoor exhibitions** ran for extended periods of time so the proposals could be viewed in context.
- **Drop-ins** were programmed as part of outdoor exhibitions to still ensure there was opportunity for people to be guided through the proposals and ask questions.
- **Audio tours** were developed for anyone visiting outside of the drop-ins.
- **Discovery packs** were developed for local children and young people to explore their local environment and collect ideas for what they would change or improve.

- **Walks and talks hosted by experts** from the Design team provided an opportunity for more in-depth conversations on specialist topics.
- **Youth workshops** ran online with the Westminster Youth Council to create 'mini-zines', which included a 'manifesto' for what priorities young people want to see.
- **Family workshops** were held as part of the Urban Tree Festival for young families to share experiences of their green spaces and collage their dream space.
- **Play workshops** explored models, den building and platform building with local children and created an opportunity to engage in conversations about natural play in the proposals.
- **Digital surveys** were developed to share and collect feedback in an accessible and engaging way.
- **Dedicated project website and digital and social media** were used to help to reach communities, share the proposals digitally and encourage them to participate.
- **Design pilot projects** helped bring to life and test aspects of the proposals.
- **Visualisation technology** such as slider visuals and 360 views were created and the audience encouraged to access these in situ by placing QR codes at relevant points around the site.

The engagement programme has been successful in reaching local and London-wide audiences and providing the framework through which the design team can develop an in-depth understanding of their priorities for the re-design ahead of developing detailed proposals.

The initial phases of engagement generated 7,261 pieces of feedback from 2,516 individuals, more than 17,000 visits to the project website and 1,013 subscribers to the mailing list, and 3,379 followers across social media accounts.

Grosvenor believe that the approach adopted for this project has demonstrated the significant value of high-quality early community engagement. Their five key pieces of learning from this project are:

- That **publishing and sharing a list of organisations** that you aim to work with and your engagement plan helps ensure any gaps are easily spotted and maximises your chances of actually engaging local people.
- Online can work for both large and small-scale events but there will always be key audiences you miss. **Do not underestimate the power of printed material** to support activities.
- **Physical installations and exhibitions** in public spaces accessible for extended periods of time help reach passers-by and people who might not otherwise engage.
- It's important to **make space for different lengths of conversations** and tailor material accordingly. For example, the digital survey needed to be short and simple for people to engage with via mobile and tablets, but some people might prefer to give more in-depth detailed feedback so create the space for that too.
- **Be prepared to try things, learn from them and adapt** the method going forward.

Case Study B – Southside, 105 Victoria Street

Developer: Welput

Architect/Agent: KPF/DP9

Engagement Lead: Kanda Consulting

Current Status: Resolution to approve in April 2021, subject to S106 completion

Early Community Engagement in a Mixed Commercial and Residential Area

A vision document was initially produced, prior to preparation of a design brief, which outlined the rich history of the site and how the site had sat at the hub of the local community. It also identified the current issues with the site, why the design and structure prevented refurbishment, and emerging ideas of potential future uses to understand local sentiment. The finalised vision was used to inform and underpin early engagement activities, including:

- **Extensive local polling** of more than 500 properties to understand the perceptions of occupants of the site, what it currently lacks and what would draw local people to it in future.
- An **early engagement forum workshop** attended by over 20 local residents and community representatives.
- A lunchtime **pop-up consultation event** in the reception of Westminster City Hall with further sessions held in the neighbouring Curzon cinema.
- Smaller **one-to-one discussions** with ward councillors and representatives of the Thorney Island Society, Cathedral Area Residents Group, Victoria Business Improvement District and the Westminster Society.
- **Dialogue with local institutions**, including the Westminster City School and Greycoat Hospital School as potentially important daytime users of 105 Victoria Street.

The initial consultation and dialogue with the local community was then used to inform the emerging land use proposals for the site and influence the design brief for the architectural team.

Following development of an architectural concept three further phases of consultation with the local community were undertaken alongside pre-application discussions with the Council to test and refine the proposals. The engagement included feedback to explain the rationale for the design approach that was pursued.

Later phases of engagement were impacted by the pandemic, so engagement during this period focused on digital formats with further awareness raising using targeted social media channels. Physical exhibition packs were also made available with freepost feedback forms to ensure the consultation remained inclusive for those with barriers to digital engagement.

The developer team in this example concluded that undertaking community engagement at the earliest stage helped the design team ensure that the finalised scheme is better designed to meet the current and future needs of residents, workers and visitors in this part of the of the city. The design team was able to make the following amendments in response to community expectations:

- **Local-needs retail** provided at ground floor around a modern day ‘village square’ in a space which can evolve and host events into the evening.

- A new '**Activities Zone**' at lower ground floor which will host community events, school activities and exhibitions free of charge.
- Extensive cycle-parking, including a new **local cycle parking hub** for local residents and workers.
- **Greening and planting** wherever possible on and around the perimeter of the building, with an urban farm at upper levels.
- **Active frontages** wherever possible to design out anti-social behaviour.
- '**Flexibility first**' in the design with an all-electric, future-proofed building that achieves the **highest standards of sustainability**.
- An improvement to the surrounding **pedestrian environment** with new crossings and **servicing arrangements**, so servicing vehicles would no longer enter the Cathedral Area Conservation Area.
- A design, scale and use of materials which has evolved through consultation and seeks to respond to the **eclectic local character** of the area.
- Flexible office space at upper levels which can evolve to meet the needs of current and future occupiers.

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Case Study C – Westminster Infill Development Programme

Developer: Westminster City Council

Architect/Agent: Various

Engagement Lead: London Communications Agency

Current Status: Permission granted for redevelopment of various sites

Early Community Engagement as part of a Multi-Site Development Programme

To meet growing housing need across the city, the Council established an Infill Development Programme. The programme looks to utilise vacant and redundant spaces and buildings throughout the city of varying sizes by redeveloping them to deliver new affordable homes using a variety of new build and conversion methods. Sites in the programme have included redundant garages at Helmsdale House, Melrose and Keith House, Ordnance Mews and Blomfield Mews, as well as the redevelopment of a community centre at 300 Harrow Road.

The Council's Development Planning Team worked with London Communications Agency (LCA) to first develop a public consultation strategy for the infill sites in the initial phase of the programme, creating a tailored approach for each. The consultation strategy mapped out the key stakeholders, including local groups, for each site, to be consulted prior to substantive engagement with planning officers.

For each site consultation letters were sent to key local stakeholders and residents in a distribution area around the sites as well as garage licensees where relevant. Housing managers also worked with LCA to spread the word via other means, such as by displaying posters in lift areas, to ensure everyone knew about the public meetings.

Public exhibition events, where information on the emerging proposals was displayed and members of the project team were available to answer questions, were held. As well as speaking to the team, visitors were encouraged to complete a comments card with their feedback. All information was also available on the Council's website including other ways to give feedback, such as by email or freephone.

Ward councillors were also engaged and given on tours of the sites. Multiple phases of engagement were undertaken for each site with care taken to provide feedback to participants of earlier rounds of engagement.

For the larger 300 Harrow Road scheme a design workshop was organised with local residents and the team worked with the Warwick Community Nursery to ensure parents were aware of the plans and the decant options for the nursery.

Feedback from the public exhibition events made a significant difference to the redevelopment schemes within the programme, with designs altered in response to consultee comments, and also help to shape the overall scope of the programme as a whole, as in some cases sites were not taken forward for redevelopment following adverse feedback from consultees.

For each site all comments made were collated and included in a detailed Statement of Community Involvement submitted with each planning application.

Appendix B – Glossary of Key Terms and Groups

Recognised Amenity Societies - In Westminster, amenity societies are statutory consultees on planning applications within their area. Further information on the 18 amenity societies in Westminster is provided by the Westminster Amenity Societies Forum (WASF): <http://westminsteramenitysocietiesforum.org/> and at the following link: www.westminster.gov.uk/sites/default/files/list_of_amenity_societies_in_westminster2018.pdf. A map of recognised amenity societies is provided at the following link: www.arcgis.com/apps/webappviewer/index.html?id=327dce58286d45e2bd87aac879bfa0d6.

Neighbourhood Forums – Neighbourhood Forums are designated by the Council under s61F of the Town and Country Planning Act 1990 (as amended). Designations must be renewed every 5 years. A designated Neighbourhood Forum is empowered by local planning authority to 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 produce a Neighbourhood Plan which, when adopted, forms part of the development plan for Westminster alongside the City Plan 2019-2040 and the London Plan (March 2021). Further details of the Neighbourhood Forums can be found at the following link: <https://www.westminster.gov.uk/planning-building-and-environmental-regulations/planning-policy/neighbourhood-forums>. A map of the neighbourhood forums in Westminster is provided at the following link: www.arcgis.com/apps/webappviewer/index.html?id=327dce58286d45e2bd87aac879bfa0d6.

Community, Residents and Tenants' Groups – These groups are typically established by smaller groups of residents, perhaps within a single building or estate, often to respond to specific concerns residents have or to assist with the management of their building or estate. Whilst they are not statutory consultees, nor do they have the governance requirement or plan making capabilities of Neighbourhood Forums or Community Councils, they are nonetheless important consultees where a development may impact a building or estate that they have an interest in.

Ward Councillors – Ward Councillors represents public interests as well as individuals living in the ward in which they have been elected. There are three Councillors for each of the City's 20 wards. A full list of ward councillors in Westminster is provided at the following link: <https://committees.westminster.gov.uk/mgMemberIndex.aspx?bcr=1>.

Community Councils – Westminster has one community council, the Queens Park Community Council. Community Councils are established under the Local Government and Public Involvement in Health Act 2007. The Queen's Park Community Council was initially established in 2012, with the first councillors elected in 2014. Community council elections are held every four years. The Queens Park Community Council is in the process of adopting a local plan, which can be viewed at the following link: www.westminster.gov.uk/planning-building-and-environmental-regulations/planning-policy/queens-park-neighbourhood-plan.

Business Improvement Districts (BIDs) – BIDS are defined areas within which a levy is charged on all business rate payers in addition to the business rates bill. This levy is used to develop projects which

will benefit businesses in the local area. BIDS are also a powerful tool for directly involving local businesses in local activities and allow the business community to work with the Council to improve the local trading environment. The maximum period that a Business Improvement District levy can be charged is for 5 years, after which the BID must hold a new ballot if it wishes to continue its activities. Most Business Improvement District bodies are not-for-profit companies. Further details of the BIDs in Westminster and the areas they cover can be found at the following link: <https://businesswestminster.com/business-enterprise/business-improvement-districts/>.

Youth Forums and Groups – There are many youth groups and forums across the city, ranging from smaller local groups to the Council's own Youth Council (www.westminster.gov.uk/event/westminster-youth-council). Organisations such as Young Westminster (<https://www.youngwestminster.com/>) may be able to assist you in identifying local youth groups and forums.

Special Interest Groups – In addition to the recognised amenity societies, there are a number of other interest groups and semi-recognised amenity societies, which despite not being statutory consultees, may be consulted on development that affects their area of interest. A full list of these special interest groups is provided at the following link: https://www.westminster.gov.uk/sites/default/files/list_of_amenity_societies_in_westminster2018.pdf.

Appendix C – Useful Publications

National, Local and Neighbourhood Guidance

1. National Planning Policy Guidance ‘Before submitting an application’ (2021): www.gov.uk/guidance/before-submitting-an-application#local-people-at-pre-application-stage
2. Draft National Design Code and Guidance Notes of Design Codes (February 2021): www.gov.uk/government/publications/national-model-design-code
3. Statement of Community Involvement in Planning (June 2014): www.westminster.gov.uk/planning-building-and-environmental-regulations/planning-policy/emerging-policies-and-consultations/statement-community-involvement
4. Best Practice Guidance on Community Engagement – Knightsbridge Association (January 2019): www.knightsbridgeforum.org/best-practice-guidance-community-engagement/

General Guidance on Good Public Engagement Practice

5. Good Practice Guide to Public Engagement in Development Schemes – Planning Aid (2010): <http://camdencen.org.uk/Resources/Planning/Communities/Good%20Practice%20Guide%20to%20Public%20Engagement%20Development%20Schemes.pdf>
6. 10 Commitments for Effective Pre-Application Engagement – Local Government Association (2014): www.local.gov.uk/sites/default/files/documents/10-commitments-effective--927.pdf
7. Inclusive Communities A guide for Local Authorities – Disability Rights UK (2014): www.disabilityrightsuk.org/sites/default/files/pdf/1%20%20InclusivecommunitiesLAGuidance.pdf
8. Community Planning Toolkit - Community Engagement – Community Places (2014): www.communityplanningtoolkit.org/sites/default/files/Engagement.pdf
9. Digital Engagement Tools - how can authorities use online platforms to facilitate meaningful participation? – Public Practice (June 2021): www.publicpractice.org.uk/resources/digital-engagement-tools

Developer Research, Guidance and Community Charters

10. Building Trust: Insight paper on good growth – Westminster Property Association (December 2018): https://issuu.com/ldnpropalliance/docs/building_trust_insight_pages
11. Rebuilding Trust – Discussion Paper – Grosvenor (July 2019): <https://grosvenor.com/Grosvenor/files/b5/b5b83d32-b905-46de-80a5-929d70b77335.pdf>
12. Positive Space: Our Community Charter – Grosvenor (2020): www.grosvenor.com/Grosvenor/files/88/888c96aa-7f04-4cbd-9745-7fd47fd8128c.pdf
13. A guide to better public engagement: Positive Space in Practice – Grosvenor (May 2021): www.grosvenor.com/Grosvenor/files/71/7186ad50-5fcb-4701-862d-6493086b33f0.pdf

Appendix D – 3D Modelling Specification

The council encourages the use of 3D modelling tools when carrying out engagement and there are a range of suppliers that can provide visualisations various different formats. These can greatly assist with the visualisation of proposed development and help to show it in the context of existing townscape. This can help consultees to better understand the impacts of proposed development and, in some cases, allay concerns they may otherwise have had.

The Council is uses Vu.City to provide a bespoke model environment of Westminster and central London when assessing development proposals. We encourage you to use this platform, or a compatible model specification, when including contextual 3D modelling in your early community engagement. Note that when seeking pre-application advice for major development, the provision of a Vu.City compatible 3D virtual model of the proposed development will also assist officers in providing advice on your proposal.

To ensure your 3D modelling is compatible with Vu.City software please ensure it meets the following specifications:

- **Geo-referenced position.** The model should be geo-referenced in space to ensure an accurate insertion into the Vu.City model
- **Scale.** Please ensure the model is correctly scaled to the appropriate dimension.
- **File format.** The model should be in the original file format. Preferred file formats are FBX or Revit files but all standard 3D modelling formats are acceptable.
- **Simplified layers.** The 3D model should not be the final detailed design, but a basic model that illustrates the form and location of the proposed buildings.
- **Scope.** Ensure the model is solely within your red line/development boundary and does not include proposals for adjoining sites.

Further information on the use of Vu.City can be found at: <https://vu.city/>.

Appendix E – Planning Area Team Contact Details

Where the early community engagement will pre-date the submission of a request for pre-application advice from officers you should contact the relevant planning area team via the email addresses below to alert them to the proposed community engagement and request officer attendance. You should provide at least 14 days notice of the intended community engagement event.

Central Planning Team: centralplanningteam@westminster.gov.uk

Covers the W1 area.

South Planning Team: southplanningteam@westminster.gov.uk

Covers the SW1, SW7, WC2 and EC4 areas.

North Planning Team: northplanningteam@westminster.gov.uk

Covers the NW1, NW6, NW8, W2, W9, W10 and W11 areas.

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**EARLY
COMMUNITY
ENGAGEMENT IN
WESTMINSTER**

**Guidance Note for Applicants and
Developers**



City of Westminster