



City of Westminster

Cabinet Member Report

Decision maker:	Cabinet Member for Planning and Customer Service
Date:	March 2006
Classification:	For publication
Title of Report:	Statement of Community Involvement in Planning
Report of:	Department of Planning and City Development
Wards involved:	All
Policy context:	THE COUNCIL'S POLICIES FOR CIVIC RENEWAL AND ONE CITY GIVE PROMINENCE TO THE IMPORTANCE OF EFFECTIVE COMMUNICATION WITH WESTMINSTER'S COMMUNITIES
Financial summary:	Costs are to be met by Planning Delivery Grant
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1. Introduction

- 1.1 The Planning and Compulsory Purchase Act 2004 (the Act) requires local authorities to replace their Unitary Development Plan (UDP) with a Local Development Framework (LDF). As part of the LDF, the Act requires local authorities to prepare a Statement of Community Involvement (SCI). The SCI sets out the stages and methods for public involvement in the documents which comprise the LDF and on planning applications, and arrangements for securing wider community involvement in developing policies and proposals.
- 1.2 A draft SCI was prepared for the purpose of public consultation in November 2005. Public consultation was held from 18th November until 30th

December 2005. The responses are summarised in Annex A. Changes have been made to the SCI following consideration of the comments made on the draft. The main points raised in consultation responses were:

- A significant number of respondents found the document to be complicated but appreciated that the process is difficult to explain as well as understand. They requested a simpler document if possible. Whilst most of the detail has been retained in the document in order to meet the tests of soundness, a shorter, easier guide will be considered for publication post-adoption. Figure 1 has been re-done and the flow diagrams on pages 20-21 checked and text simplified where possible.
- A number of respondents found the summary document to be very helpful. Comments welcomed.
- Several respondents pointed out that meetings are useful if they are focussed and based on clear issues. This is reflected in the section illustrating the range of consultation methods that may be offered.
- People still prefer to be sent information in the post and do not want to have to rely on electronic communication. The SCI reflects a commitment to continue to send people paper copies of consultation documents.
- There was a comment that the draft document did not reflect the particular needs of people with disabilities, young people's and elderly people's groups. This has been rectified by adding to the text key organisations representing these groups which the council will consult, and clarifying textual references, particularly at paras 15, 22, 50, 51, 52 and 63.

2. Recommendations

- 2.1 That the officer responses to the representations received in response to public consultation on the draft SCI, as set out in Annex B, be approved.
- 2.2 That the submission version of the SCI attached in Annex C be approved for submission to the First Secretary of State and placed on deposit for 6 weeks.
- 2.3 That the statements pursuant to subparagraphs (c) and (d) of Regulations 28(1) of the Town and Country Planning (Local Development) Regulations 2004 which are attached as Annexes B and D to this report be approved and that the Director of Planning and City Development have delegated authority to carry out all other procedural requirements of the Regulations.

3. Background

- 3.1 The City Council's SCI has been prepared in accordance with the requirements of new legislation in the Act. It is a statutory document and must be prepared in accordance with the Regulations and must also meet certain tests of "soundness" before it can be adopted.

The Nine tests of soundness

The draft SCI will be examined by an inspector approved by the Secretary of State, who will determine whether:

1. the local planning authority has complied with the minimum requirements for consultation as set out in the Regulations (26, 28 and 29 of the Town and Country Planning (Local Development)(England) Regulations 2004).
2. the local planning authority's strategy for community involvement links in with other community involvement initiatives e.g. the community strategy.
3. the SCI identifies in general terms which community groups and other bodies will be consulted.
4. the SCI identifies how the community and other bodies can be involved in a timely and accessible manner.
5. the methods of consultation to be employed are suitable for the intended audience and for different stages in the preparation of local development documents.
6. resources are available to manage community involvement effectively.
7. the SCI shows how the results of community involvement will be fed into the preparation of development plan documents and supplementary planning documents.
8. the Council has mechanisms for reviewing the statement of community involvement, and
9. the SCI clearly describes the planning authority's policy for consultation on planning applications.

3.2 It is considered that the SCI meets the tests of soundness in the following ways:

i. Local planning authority has complied with the minimum requirements for consultation as set out in Regulations

- Regulation 25:
Appendix 1 of the SCI: lists all the specific consultation bodies (reg. 25 1(a)) and general consultation (reg. 25 1 (b)) that have received the Draft SCI – their contact details are stored on a computerised database. Likewise with Reg. 25 (2) – all of whom were consulted.
- Regulation 26:
Extensive consultation was carried out at the draft stage as explained fully in the report and analysis at Annex A to this report
- Regulation 28:
“When they [the Local Authority] submit the representations on the Submission SCI, they should provide a statement detailing the consultation undertaken under Reg. 28.”
The City Council is complying at this stage, see Annex B to Cabinet Member Report which sets out all representations received at the draft stage.

ii. Local planning authority's strategy for community involvement links with other community involvement initiatives e.g. the community strategy

- The section “The Local Development Framework and the Community Strategy (City Plan)” (Paragraph 20) states that the “Strategy will be taken into account in preparing the LDF and the city council will maximise opportunities, wherever possible, for joint working and shared consultations activities”.
- “Westminster’s Community Involvement Aim” (paragraphs 21-22) describe council-wide principles, which are similar to the tests of soundness and ensure that the process of consultation is well guided.
- “Methods of community involvement” (paragraphs 51-52) shows that links are not only made to other community involvement initiatives but also to community networks and organisations, which can be used as facilitators in engaging the public (e.g. the Westminster City Partnership Network and Voluntary Action Westminster).

iii. Statement identifies in general terms which local community groups and other bodies will be consulted

- “What do we mean by Community?” (paragraphs 10-15) sets out who in general terms we will consult, and includes a broad range of groups including service providers, landowners, ‘place’-based groups, ‘spatial issues’ groups, businesses, workers, hard to reach groups, such as young people and tourists/visitors.
- Appendix 1 to the SCI has a list of consultees, including general consultation bodies and other consultees (adapted from Annex E of PPS12). It is not possible to publish an exhaustive list in the document itself, although the current database is comprehensive, up-to-date and includes over 1600 entries.
- “Methods of community involvement” (paragraph 52) shows how the city council will utilise different voluntary and community groups to improve the involvement of diverse and sometimes difficult to reach groups.

iv. Statement identifies how the community and other bodies can be involved in a timely and accessible manner

- “Methods of community involvement” (paragraph 51) talks about timeliness of consultation. The city council has entered into a Westminster Compact with the voluntary and statutory sectors, which agrees to allow reasonable time for major consultations. The city council will endeavour to offer more than the minimum period for consultation, specified in the regulations.
- “Methods of community involvement” (table under paragraph 53) spells out what methods we will use, together with their benefits – spelling out how the community and other bodies can be involved in a timely and accessible manner.
- Figures 2-3 set out how public will be involved, breaking complex processes into an easy-to-follow diagram. The figures show when and how people can be involved in the various stages of the preparation of DPDs/SPDs.

v. Methods of consultation to be employed are suitable for the intended audience and for the different stages in the preparation of local development documents

- “Methods of community involvement” (table under paragraph 53) spells out what methods the city council will use, together with their benefits, and to which

documents they apply. Notes are also made on who might benefit most from each method of consultation.

- “Methods of community involvement” (paragraphs 50-51) recognises that certain groups are harder to reach or have issues with accessibility – and proposes a range of methods to open up consultation more widely.
- Lessons are being learnt on an ongoing basis as a result of monitoring effectiveness in ways described under “Monitoring and effectiveness” (paragraph 32). For example, a pre-submission consultation scoping survey carried out in September 2005 on the ways in which the city council might inform and involve people in the LDF process, showed a strong preference in favour of using e-mail or traditional post over other means. Continuous monitoring of consultations and the responses will lead to adjustment in methods used, for different documents and subject areas.
- Figures 2-3 of the SCI sets out when the public can be involved in the various stages of the preparation of LDDs.

vi. Resources are available to manage community involvement effectively

- Westminster’s LDS already plans a timetable ahead so that time resources are well spent
- “Resources and management” (paragraphs 28-31) describes who will resource and manage the consultation process, and how the city council will work in partnership to maximise the effectiveness and efficiency
- “Methods of community involvement” (paragraph 54) describes the resources that will be made available to the public, in terms of background and supporting documents. This will give the public the information resource they need to comment on proposals put forward by the city council.

vii. Statement shows how the results of community involvement will be fed into the preparation of development plan documents and supplementary planning documents

- “Consultation on DPDs / SPDs” (paragraphs 42-46) shows the four main stages in the DPD process, and how at each stage (especially pre-production and production stages) the public will be consulted, and crucially, how consultation will feed into the evolution of a LDDs.
- “Using the results of consultation and engagement and feeding back” (paragraph 25) describes what the city council will do with the responses it receives and how these will feed into the preparation of LDDs. Already with the Draft SCI, a summary of responses table has been devised which records representations made, officer comments, and what changes will be made to the Submission SCI. This is publicly available.
- “Feeding back the results of participation and public engagement” (paragraphs 55-56) shows that not only does the city council wish to consult its communities, but also will feedback results “to inform participants and the wider community of what has happened as a result of their involvement and why.”

viii. Authority has mechanisms for reviewing the statement of community involvement

- “Monitoring and effectiveness” (paragraphs 32-33) talks about keeping the SCI under review by regularly evaluating the effectiveness of consultation and other methods of public engagement.
- Consultation on the Draft SCI led to over 40 people/organisations making representations which led to revisions now reflected in the Submission SCI.
- Paragraph 33 describes the triggers to reviewing the SCI, including the AMR.

ix. Statement clearly describes the planning authority’s policy for consultation on planning applications.

- Chapter 3 identifies the guiding principles for consultations, which aim to ensure the community is fully involved at all stages.
- Minimum requirements are met under “The planning application stage - a) Legal consultation requirements”. Westminster will go beyond this however, and “Other community involvement” sets out who else will be consulted on planning applications, and how.
- “Other community involvement” (points 8-10) shows how the results of consultation will be reported and informs decisions on planning applications.
- In line with the new LDF system, the section “The pre-application stage” explains how consultation should be front-loaded as much as possible, and the benefits this may bring.
- The nature of consultation appropriate to different types of application will vary enormously, and so different types of applications are dealt with under their own sub-heading (e.g. Trees, Conservation Area Consent)
- “The pre-application stage” sets out Westminster’s policy towards pre-application consultations and the expected role of applicants.

Paragraph 35 states what legislation and documents were referred to in preparing the SCI. The SCI goes beyond the tests of soundness. Chapter 2 explains the LDF system generally, as do figures 2-3. The SCI includes a full glossary, diagrams and figures, and makes use of plain English as far as possible.

4. Consultations on the draft SCI

- 4.1 The SCI is subject to the consultation processes set out in the Town and Country Planning (Local Development) (England) Regulations 2004. In compliance with Regulation 25, a pre submission consultation survey was undertaken on-line and by post in August/September 2005 seeking the views of specific, general and other bodies as to how they would prefer to be consulted and on what particular topics.
- 4.2 The draft SCI was subjected to a six week period of pre-submission public participation between 18th November and 30th December 2005, during which time people could submit comments to the City Council, on-line, via traditional post, by telephone or by printed response form. The consultation process included the following:
1. The LDF website home page was fully revised and updated to provide the public with clear, accessible information about the changes to the development planning

system This included the draft SCI document and an online response form. The home page link was promoted in all communications.

2. A stand alone summary leaflet to introduce the LDF and SCI to the wider public was produced and distributed through Westminster libraries and One Stop Services.
 3. A Council press release was issued on the draft SCI consultation in addition to short news items placed in both the October and December 2005 editions of the Westminster Reporter. Details of the consultation were also widely circulated to amenity society chairmen and planning consultants?
 4. News items were placed in the newsletters of the South East Bayswater Residents' Association (SEBRA), the Paddington Waterways and Maida Vale Society and the Marylebone Association and in the NEWSPAD e-bulletin which is a local information website, serving the communities of Paddington, Bayswater, Queensway, Lancaster Gate, Hyde Park and Maida Vale.
 5. The consultation documentation was circulated to CityWest Homes, 14 tenant management associations and all residents' associations in Westminster.
 6. Nearly 600 people were notified by e-mail and given the link to the website and details of how to reply on-line.
 7. Over 800 people and organisations received paper copies of the draft SCI and leaflet with response form, by post.
 8. Over 200 people and organisations were sent the summary leaflet and letter. All councillors received a complete pack of documents with response forms.
- 4.3 The draft SCI was made available at the Bayswater and Maida Vale Area Forums in November 2005 and items on the consultation in all the Area Forum newsletters were published after the meetings. Information was given out at Area Forum meetings in February and March 2006.
- 4.4 Copies of the draft SCI and details of the consultation were circulated to all members of the Westminster Community Partnership (including the 13 Thematic Networks and Local Area Renewal Partnerships) ahead of its meeting on 30 November 2005.
- 4.5 The draft SCI consultation was presented to a Westminster Involving People Network meeting on 13 November 2005 and taken to a BME Network evening hosted by the Leader with Westminster Partnership for Racial Equality, also on 13 November 2005.
- 4.6 A public meeting of the Overview and Scrutiny Committee on 14th February 2006 heard a presentation on the SCI and LDF from a director of Planning Aid for London as well as presentations from the Chairman of Westminster Amenity Societies Forum (giving residents' perspective on public engagement) and a representative of the Westminster Property Owners' Association who gave insight into the commercial sector perspective.

5. Next steps

- 5.1 Officers have considered the representations received during the consultation period. An analysis by officers of those representations is attached as Annex A. The detailed representations and officer comments are attached as Annex B. These, together with proposed changes to the draft SCI (Annex C), will be placed on the LDF web-site and sent to everyone who sent in comments.
- 5.2 The revised document at Annex C, once approved, will be submitted to the First Secretary of State at the end of March 2006, at which time there will be a further statutory formal consultation period of six weeks. The submitted SCI and any representations which are received during this period will be subject to independent examination by a government-appointed planning inspector.
- 5.3 The independent examination may be conducted by means of written representations. However, if any person or organisation wishes to exercise their right to attend the examination and be heard, a hearing will be arranged. This may take the form of either round table discussions, or informal or formal hearing sessions. Following the Inspector's report, which will be binding on the City Council, the SCI will be updated to reflect the Inspector's recommendations and then formally adopted.

6. Financial implications

- 6.1 Consultation demands huge resources. The cost of the public engagement work that will need to be carried out to fulfil the City Council's statutory duty, will be largely borne by Planning Delivery Grant (PDG). It is extremely important that the timescales set out in the LDS (Local Development Scheme) for the preparation of LDF documents, including the SCI, are not allowed to slip significantly, in order not to risk the forfeit of any element of PDG.

7. Legal implications

- 7.1 It is a statutory requirement under Section 18 of the Planning and Compulsory Purchase Act 2004 to produce a Statement of Community Involvement. It will be subject to independent examination. The procedures leading to adoption of the SCI are set out in paragraphs 5.2 and 5.3 of this report.
- 7.2 The Race Relations (Amendment) Act 2000 places a new statutory duty on local authorities to promote race equality. This duty means that authorities must have due regard to the need to eliminate unlawful racial discrimination and promote equality of opportunity and good relations between persons of different racial groups. Community involvement in planning will need to address the involvement of different racial groups. The City Council, in consulting the Westminster City Partnership and its internal head of equalities is ensuring that the Statement of Community Involvement takes full account of race equality issues.
- 7.3 Local authorities are also required to comply with the Disability Discrimination Act 1995 which places a duty on all those responsible for providing a service to the public not to discriminate against disabled people by providing a lower standard of service. Service

providers now have to consider making reasonable adjustments to the way they deliver their services so that disabled people can use them.

8. Staffing implications

8.1 No new issues arising.

9. Outstanding Issues

9.1 No outstanding issues

10. Performance Plan implications

10.1 The Statement of Community Involvement has been identified in the Local Development Scheme as one of the first Local Development Framework documents to be produced and is indicated in the Forward Plan.

11. Crime and Disorder Act

11.1 No issues arising

12. Health and Safety issues

12.1 no issues arising

13. Impact on Health and Wellbeing

13.1 A more effective system for engaging people on issues affecting their local areas, should be beneficial to the community's understanding of changes taking place, and how they can become involved in a more positive way.

14. Human Rights Act 1988

14.1 No particular issues arising.

15. Conclusions and Reasons for the Proposed Decision

15.1 The comments on the draft SCI have overall been favourable, although there is still scope to make the document easier to understand, with more diagrams and case studies. It would also be useful to publish a summary version once the SCI is adopted.

If you have any queries about this report or wish to inspect any of the background papers, please contact Gillian Dawson on 020 7 641 2457 ; e-mail address gdawson@westminster.gov.uk; fax 020 7641 3050

Background papers

1. Draft Statement of Community Involvement, November 2005
2. Report to City Development Overview and Scrutiny Committee, 14 February 2006
3. Report to Cabinet Member for Planning and Customer Services, November 2005
4. Responses to pre-submission consultation
5. The Council's Local Development Scheme

ANNEX A

City of Westminster Statement of Community Involvement

Statement in pursuant to Regulation 28 (i) (d)

Summary of representations

Westminster City Council's Draft Statement of Community Involvement (SCI) was released for public consultation in November 2005. Consultees were given six weeks to respond to the document. Consultation closed on 30th December although a number of later responses have been considered since that date.

Around 1600 people from the LDF database were invited to comment. These included individuals and groups from the business, property, voluntary, community and government sectors. Around one half of these were sent a letter and a hard copy of the Draft SCI; the other half were contacted by email or sent a summary leaflet only.

Number of responses

- A total of 57 responses were made to the Draft SCI document as follows:
 - 33 standard response forms were received.
 - 24 detailed written representations were received.
- 70% of all responses were sent only in the post; 21% were sent only by email; and 8% were sent using both post and email.

Response form analysis

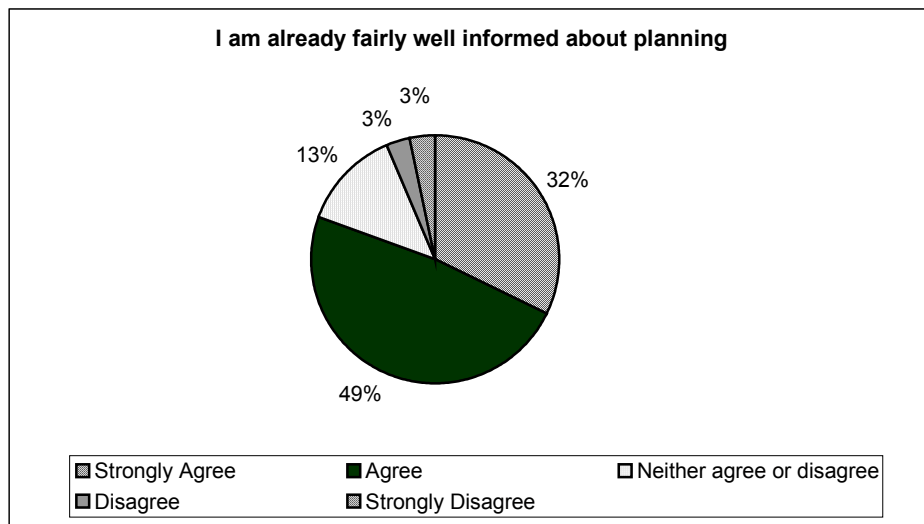
- A standard response form was made available for respondents to record their views on the Draft SCI, and this next section summarises responses to the document.
- Despite being offered different means of responding to the document, most respondents (74%) returned the questionnaire by post, as opposed to electronically on Westminster's LDF website (16%). Those using both post and email, and fax, represented a further 10%.

Who responded?

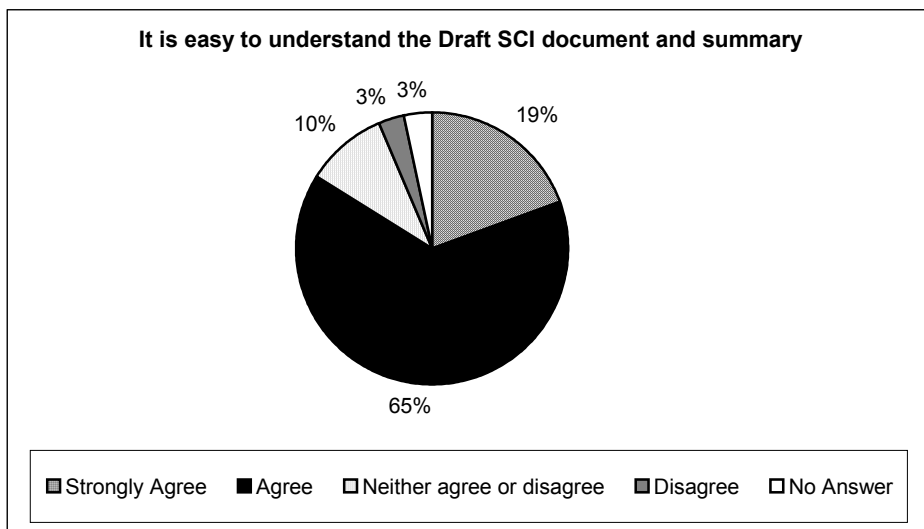
- Predominantly groups/organisations rather than individuals.
- However, a wide range of groups were represented, including:
 - the community and voluntary sectors:
 - Soho Family Centre; London Forum of Amenity and Civic Societies; Volunteer Centre Westminster.
 - property owners:
 - Shaftesbury PLC; St Martin's Property Corporation Ltd.; National Grid Property Ltd.; New West End Company; St James (Grosvenor Dock) Ltd.; WPOA.
 - public bodies/institutions:
 - Westminster Primary Care Trust; Transport for London.

Responses to the SCI document

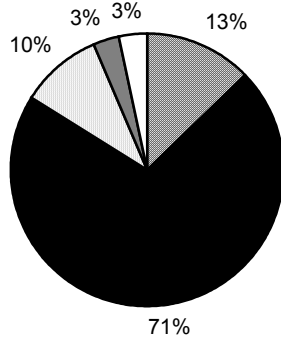
- Most people consider that they are already fairly well informed about planning:



- Despite the SCI being a lengthy document that must satisfy 'tests of soundness' and engage the public, most respondents felt it was understandable and clearly explained how to become involved in plan making



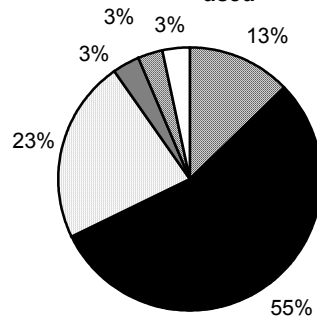
It clearly explains how to become involved in plan making



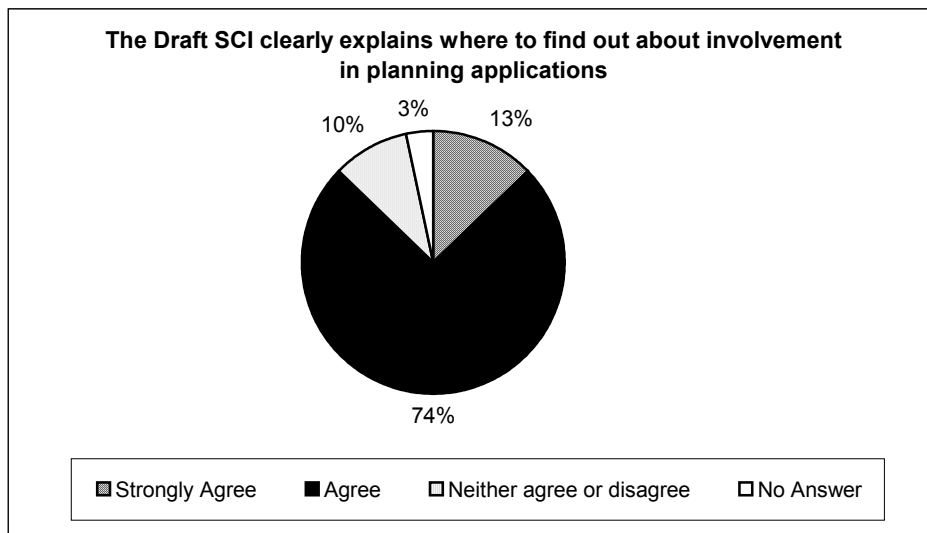
■ Strongly Agree ■ Agree □ Neither agree or disagree ■ Disagree □ No Answer

- Satisfaction with methods of public involvement was not as clear cut: although a third of respondents were either in 'strong agreement' or 'agreement' with the proposed methods, people provided additional suggestions in the comments box (see below).

I am satisfied with the methods of public involvement that will be used



■ Strongly Agree ■ Agree □ Neither agree or disagree
■ Disagree ■ Strongly Disagree □ No Answer



- Almost 84% of respondents were interested in participating in a discussion event about planning issues in Westminster.

Additional comments made on the Draft SCI and summary leaflet

- Summary leaflet useful and worthwhile.
- Document overall well-written and clear.
- A lot of space is devoted to 'methodology' but respondents appreciate that the Council has to spell this out in order to meet tests of soundness.
- People want to get developers involved in consultation on their proposals at an early stage.
- Fuller listing of consultees both in appendices and in the main document itself would ensure that different interest groups are properly represented in the document.
- Give more prominence in the document to seldom heard groups such as those with disabilities and young people

Written representations received by early January 2006

- Further to receiving completed response forms on or before 30th December 2005, a number of written representations were made. These are given in full in the schedule of responses and were considered in detail when revising the Draft SCI.

Detailed comments on the document itself (as opposed to general letters of interest) have come in from the following organisations. Underlined groups are those that have made specific reference to areas of text. Non-underlined groups are those that have general comments on the approach set out in the draft SCI.

By post:

- Hyde Park Estate Association
- London Forum of Amenity and Civic Societies
- Government Office for London
- St James (Grosvenor Dock) Ltd – c/o Barton Willmore
- WPOA – want further discussions on happens with pre-application consultation
- Thames Water – want it made clear that they are on specific consultee list
- Transport for London – generally supportive
- The Westminster Society

- Home Builders Federation (HBF)
- Environment Agency
- Metropolitan Police Authority (c/o CGMS Consulting) – general interest
- Voluntary Action Westminster
- Policy Unit, WCC
- Covent Garden Community Association
- English Heritage

By email

- Education - Youth Service
- Policy Unit
- Penny Shepherd
- Cllr Audrey Lewis
- Cllr Colin Barrow
- Corporate Property, WCC
- South Westminster LARP / Cross River Partnership

Several organisations have written either directly or through their agents, to express their interest in getting involved in the LDF process. These include:

- National Offender Management Service (NOMS), which incorporates HM Prison Service (c/o Lambert Smith Hampson)
- London Ambulance Service (c/o Malcolm Judd & Partners)
- Imperial College (c/o Gerald Eve)
- The Marylebone Association
- Covent Garden Area Trust
- NHS London Healthy Urban Development Unit (through the PCT)
- National Grid (c/o Malcolm Judd & Partners)
- The Countryside Agency – Landscape Access Recreation
- Fairview Homes (c/o RPS Planning)
- British Waterways London
- Union Railways (North) Limited
- WM Morrison Supermarkets Plc. (c/o Rapleys)
- Highways Agency
- The Chartered Institution of Waste Management
- The Theatres Trust
- Jones Lang Lasalle

Late responses were reflected in the final analysis of responses and any feedback, as well as any changes to the SCI itself.

ANNEX D
Town and Country Planning (Local Development) (England) Regulations 2004
Statement pursuant to Regulation 28 (1) (d)

City of Westminster Statement of Community Involvement

Public participation on the draft (pre-submission) Statement of Community Involvement

1. The draft SCI was subjected to a six week period of pre-submission public inspection and participation, during which time people could submit comments to the City Council, on-line, via traditional post, by telephone or by printed response form.
2. The LDF website home page was fully revised and updated to provide the public with clear, accessible information of the changes. This included the draft SCI document and an online response form. The home page link was promoted in all communications.
3. A stand alone summary document to introduce the LDF and SCI to the wider public was produced and distributed through Westminster libraries and One Stop Services.
4. A council press release was issued on the draft SCI consultation in addition to short news items placed in both the October and December 2005 editions of the Westminster Reporter. Consultation details were also widely circulated to amenity society chairman and planning representatives.
5. News items were placed in the newsletters of the South East Bayswater Residents' Association (SEBRA), Paddington Waterways and Maida Vale Society and Mairylebone Association newsletters and in the NEWSPAD e-bulletin which is a local information website, serving the communities of Paddington, Bayswater, Queensway, Lancaster Gate, Hyde Park and Maida Vale.
6. The consultation documentation was circulated to CityWest Homes, 14 tenant management associations and all resident associations in Westminster.
7. Nearly 600 people were notified by e-mail and given the link to the website and details of how to reply on-line.
8. Over 800 people and organisations received paper copies of the document and leaflet with a response form, by post.
9. Over 200 people and organisations were sent the summary leaflet and letter.
10. All Westminster's councillors received a complete pack of the documents with response forms.
11. The draft SCI was made available at the Bayswater and Maida Vale Area Forums in November 2005 and a news item on the SCI consultation was published in all six Area Forum newsletters published after the meetings, covering the whole of Westminster's area. Further information was given out at Area Forum meetings in February and March 2006 summarising main comments received in poster style.

12. Copies of the draft SCI and details of the consultation were circulated to all members of the Westminster City Partnership (including the 13 Thematic Networks and Local Area Renewal Partnerships) ahead of its meeting on 30 November 2005.
13. The draft SCI consultation was presented to a Westminster Involving People Network meeting on 13 November 2005 and taken to a BME Network evening hosted by the Leader with Westminster Partnership for Racial Equality, also on the evening of 13 November 2005.

Organisations and bodies consulted on the draft Statement of Community Involvement

- (a) The Mayor of London;
- (b) Neighbouring authorities:
 - Corporation of London
 - London Borough of Lambeth
 - London Borough of Camden
 - London Borough of Brent
 - London Borough of Wandsworth
 - London Borough of Southwark
 - Royal Borough of Kensington & Chelsea
- (c) The Countryside Agency;
- (d) The Environment Agency, London;
- (e) Transport for London;
- (f) The Historic Buildings and Monuments Commission for England (English Heritage);
- (g) English Nature, London office;
- (h) The Department for Transport/ Network Rail;
- (i) London Development Agency;
- (j) Any person to whom the electronic communications code applies by virtue of a direction given under Section 106 (3)(a) of the Communications Act 2003;
- (k) Companies owning or controlling electronic communications apparatus situated in Westminster (see below); and
- (l) Strategic Health Authority (see below) ;
 - (i) British Gas
 - (ii) Thames Water
 - (iii) Thames Water Utilities
 - (iv) Transco South East
- (m) Civic Trust
- (n) Visit London

Government Departments

- (a) Home Office;
- (b) Department for Education and Skills (through GoL);
- (c) Department for Environment, Food and Rural Affairs;
- (d) Department for Transport (through GoL);
- (e) Department of Health (through relevant Regional Public Health body);
- (f) Department of Trade and Industry (through GoL);
- (g) Ministry of Defence;
- (h) Department of Work and Pensions;
- (i) Department of Constitutional Affairs;
- (j) Department for Culture, Media and Sport;
- (k) Office of Government Commerce (Property Advisers to the Civil Estate)

General consultation bodies – listed below and including the following categories:

- (a) Voluntary bodies some or all of whose activities benefit any part of the authority's area (see residents' associations listed below)

- (b) Bodies which represent the interests of different racial, ethnic or national groups in the authority's area;
- (c) Bodies which represent the interests of different religious groups in the authority's area;
- (d) Bodies which represent the interests of disabled persons in the authority's area; and
- (e) Bodies which represent the interests of persons carrying on business in the authority's area.

Age Concern

British Chemical Distributors and Traders Association

British Geological Survey

British Waterways

Centre for Ecology and Hydrology

Westminster Chamber of Commerce

Church Commissioners

Civil Aviation Authority

Coal Authority

Commission for Architecture and the Built Environment

Commission for Racial Equality

Crown Estate Office

Diocesan Board of Finance

Disability Rights Commission

Disabled Persons Transport Advisory Committee

National Grid Company, Transco

Friends of the Earth

Royal Society for the Protection of Birds

Wildlife Trust

Equal Opportunities Commission

Fire and Rescue Services

Freight Transport Association

Health and Safety Executive

Help the Aged

Housing Corporation

Learning and Skills Councils

National Playing Fields Association

Network Rail

Passenger Transport Authorities

Passenger Transport Executive

Police Architectural Liaison Officers/Crime Prevention Design Advisors

Road Haulage Association

Sport England

The Home Builders Federation

Transport for London

Women's National Commission

Citizens Advice

Anglican Church

Anglo-Egyptian Society

West London Synagogue

Western Charitable Foundation

St John's Wood Synagogue

Jewish Council For Racial Equality

Liberal Jewish Synagogue
Naima Jewish Preparatory School
Spanish and Portuguese Jews Congregation
IQRA Trust
London Central Mosque and Islamic Cultural Centre
Eritrean Muslim Community Association
Muslim Advice Centre
Union of Muslim Families
Islamic Cultural Centre
The Central London Gurdwara
Radha Krishna Temple
Caribbean Hindu Society
Lisson Green Bangladeshi Pensioner, Elderly & Disabled Association
Marylebone Bangladesh Society
Queen's Park Bangladesh Association
Arab Welfare Advisory Centre
British Arab Resource Centre
Pakistan Community Organisation
Moroccan Community Association
Al-Hasaniya Moroccan Women's Centre
Bengali Women's Group
Bengali Institute
North Westminster Bengali Women
Bengali Cultural Association
Jehovahs Witnesses in Westminster
Consortium of Bengali Associations
Kickstart for Children and parents
John Lyon's Charity
Westminster Action Network on Disability
Disability Rights Commission
Equal Opportunities Commission
London & South Region Commission for Racial Equality
Age Concern - Pullen Day Care Centre
Age Concern - Sherbourne Day Care Centre
Age Concern - Spice and Rice Project

Strategic Rail Authority
Network Rail
Crossrail
Freight Transport Association (London & SE Region)
T-Mobile
Mobile Operators Association
Crown Estate
British Gas
British Gas plc
British Gas (Properties)
British Telecom
British Telecom (Planning Section)
Civil Aviation Authority
Housing Corporation

Post Office Counters Ltd
Post Office Property Holdings
Shadow Strategic Rail Authority
Union Railways
London Fire & Emergency Planning Authority

North East London Strategic Health Authority
North West London Strategic Health Authority
North Central Strategic Health Authority
South West London Strategic Health Authority

Thames Water Wastewater Services
National Grid (London)
National Grid Company
National Grid Transco plc
Electricity, Gas and Telecommunications Undertakers & the National Grid Company

Residents' groups consulted

- SEBRA (South East Bayswater Residents' Association)
- Soho Society
- Marylebone Association
- Paddington Waterways and Maida Vale Society
- St Marylebone Society
- Westminster Society
- The Westminster Society
- Fitzrovia Neighbourhood Association
- Hyde Park Estate Association
- Westbourne Neighbourhood Association
- Knightsbridge Association
- Covent Garden Community Association
- Residents Society of Mayfair and St James's
- Residents Association of Mayfair
- Association of Residents of Mayfair
- Bayswater Residents Association
- Belgravia Residents Association
- Millbank Estate Residents Association
- Ponsonby Residents Association
- Westbourne Terrace Residents' Association
- Westbourne Park Residents' Association
- Carlton Hill Residents' Association
- Abbots Manor Tenants' Association
- Amberley Residents' Association
- Ascot & Windsor Residents' Association
- Avenue Gardens Residents' Association
- Blandford Estate Residents' Association
- Boundary Road Estate Tenants & Residents' Association
- Bronwen Court Residents' Association
- Brunel Estate Residents' Association
- Brunswick & Dalkeith Residents' Association

- Churchill Gardens Residents' Association
- Cotes House Tenants & Residents Association
- Crawford Mansions Tenants' & Residents' Association
- Dufours Residents Association
- Eden House Residents' Association
- Fisherton Street Residents' Association
- Fleming Court Residents' Association
- Four Rivers Residents' Association
- Freshwater Court Residents' Association
- Gatliff Close Residents' Association
- Grosvenor & Regency Management Organisation
- Hall & Braithwaite Residents' Association
- Hall Park Residents' Association
- Hallfield Estate Residents' Association
- Hide Tower Residents' Association
- Holcroft Court Residents' Association
- John Aird Court Residents' Association
- Kemp House Residents Association
- Keyham House Residents' Association
- Lilestone Estate Residents Association
- Lillington & Longmoore Gardens Residents Association
- Lisson Green Tenants' & Residents' Association
- Luxborough Tower Residents Association
- Lydford Estate Tenants & Residents Association
- Maida Vale Estate Tenants & Residents' Association
- Martlett Court Residents' Association
- Millbank Estate Residents' Association
- Morris House Residents' Association
- Mozart Estate Tenants & Residents Association
- Oak Tree House Residents' Association
- Parsons House Residents' Association
- Pimlico FREDA
- Porchester Estate Residents' Association
- Queens Park Court Residents' Association
- Queens Park Estate Residents' Association
- Russell House Residents' Association
- Scott Ellis Gardens Association
- Semley House Residents' Association
- Siddons & Stirling Residents' Association
- Tollgate Gardens Residents' Association
- Townshend Estate Residents' Association
- Vale Royal House Tenants' Association
- Warwick Crescent Residents' Association
- Warwick Estate Residents' Association
- Wellington Road Association
- Wessex Gardens Residents' Association
- Wharncliffe Gardens Residents' Association
- York Mansions Residents' Association
- Brindley Community Association
- Pimlico Street Properties Association
- Street Properties Association

- Densham House Residents' Association
- Notcutt House Leaseholders' Association
- Four Rivers Residents Association
- Porchester Estate Residents Association
- Westminster Federation of Residents' Associations
- Harrowby and District Residents Association
- St James's Residents' Society
- Fitzrovia Court Residents' Association

Commercial and other general consultees

Rialto Homes plc
Hilton London Metropole
Montagu Evans
Tesco Stores
GVA Grimley
Action Housing Association
Community Housing Association
Grainhurst Properties Limited
Henry, Butcher, Smith & Vincent
R P S Chapman & Warren
GJW Government Relations
Chesterton International Property Consultants
Colliers, Erdman, Lewis
Fujita Co UK Ltd
London Rivers Association
Friends of the Earth
Peabody Trust
Paddington Regeneration Partnership
Central Westminster Police/Community Consultative Group
Freeth, Cartwright, Hunt, Dikins
Cameron McKenna
FPD Savills
Norton Rose
CB Hillier Parker
Shaftesbury PLC
West End Retail Partnership
London River Services
London Underground Limited
Jones Lang La Salle
Tishman Speyer Properties
St Mary's Hospital
Heathrow Express
Inner London Group
Sport England (London & SE Region)
Building Research Establishment (BRE)
Building Research Energy Conservation Support Unit
Valpak
Central and Cecil Housing Trust
Community Housing Association
Fibbens Fox Associates

Crown Castle
Independent on Sunday
DPDS
London Wildlife Trust
Robert J B Dorin
Town Planning Consultancy
Heatherside Properties
Frank Knight
Fuller Peiser
Michael Woolf & Co
Lawson Price
London Historic Parks & Gardens Trust
Clyder Enterprises Limited
Hammerson Properties PLC
Friend Associates
Boots the Chemist
Look Ahead Housing and Care
Olswang
Weatherall Green & Smith
English Partnerships
Cinema Exhibitors Association
Paddington Churches Housing Association
Servite Houses
David Walker Chartered Surveyors
Royal Society for the Protection of Birds
Peacock & Smith
Berwin Leighton
Planning Consultants
Planning Perspectives
Anthony Bowhill & Associates
St George Plc
Robin Bretherick Association
Mapeley Columbus Ltd
Hilton International
Windmill Developments Ltd
J D Wetherspoon Plc
The Berkeley Group
ISIS Property Asset Management
Goulden's
Asset Consultants Ltd
Mount Eden Land Ltd
London Hostels Association Limited
Selfridges & Co.
The Trustees of the Tate Gallery
Intercontinental Hotel Group
White Star Line Restaurants
Equitable Life Assurance Society
British Casino Association
Happybadge Projects Limited
Lipkin Gorman Solicitors
C Quested

Mount Cook Land Limited
National Car Parks Ltd
Office Bar (The)
The London Diocesan Fund
Somerset Stores Ltd
Lloyds TSB Bank Plc
Westminster Action Network on Disability
Travis Perkins
Whistlestop
Westminster Partnership
Westminster Property Owners Association
Westminster Amenity Societies Forum
Body Shop International Plc

Central London Partnership
Traffic Committee for London
DTZ Pleda
Lafarge Redland Aggregates Ltd
Scottish & Newcastle Retail
Charter Hospitals
Westminster Association for Mental Health
United Women's Homes Association Ltd
YWCA
SFI Group PLC
Thames 21
Stephen Harwood Solicitors
London Development Partnership
Passage Day Centre & Night Shelter for Homeless
People
London School of Economics and Political Science
Ritterman Holdings
Ambika House Limited
Minerva Plc
Nautilus Properties Ltd
Outdoor Advertising Association
Royal Bank of Scotland Group
Standard Life Assurance Company
Wereldhave Property Corporation PLC
St Martins Property Investments Limited
Mitchells and Butlers
City Cruises Plc
The British Hospitality Association
The Association of Licensed Multiple Retailers (ALMR)
Orange Personal Communications Services Limited
Future Energy Solutions
University of Westminster
Wood Bank
London Residential Research
Maurice Nadeam & Co,
Cliff Walsingham & Co.
Greater London Action on Disability

Atlantic Bar and Grill
George Wimpey
RPS
CHICL Communities and Homes in Central London
Broadway Malyan
Malcolm Judd & Partners
Mott MacDonald
Savell Bird & Axon
Baker & McKenzie
Elsworth Sykes
Fairview New Homes Plc
Crown Castle UK Ltd
Urbium
Chinese Community Office
Whitbread Plc
S J Berwin & Company
SITA
BUJ Architects
Alexander Rees Thompson
Shillaman Smith Architects
City & West End Development Ltd
Circle 33 Housing Association
Select Land Associates
Symonds
Paul Davis & Partners
The Trustees of the Pollen Estate
Ropemaker Properties Ltd
Abou Zaki Holding Company
Helical Bar
Warner Village Cinemas
Ash Design Consultant Ltd
City and Central Developments
Dover Street Wine Bar
London Electricity
RPS Chapman Warren
Legal & General Life Assurance Society Ltd
London & Regional Properties
The Cooper Group
London Clubs International Plc
Greater London Magistrate's Courts Authority
Sainsbury's Supermarkets Ltd
Intercontinental Hotels Group
Grosvenor Group
Megaprofile Ltd
Manto Group
HCA Healthcare
Westminster Archives Centre
JMP
Morley Property and Property Merchant Group
Paul Dickinson & Associates
Moshi Moshi Sushi

Stow Securities
Yates Group PLC
Logic.com Ltd
Stockcredit Ltd
Kensington and Chelsea with Westminster Friends of
the Earth
MOD Defence Estates
Communities and Homes in Central London
RPS Chapman Warren
WHICH
John Sharkey & Co
Robert Turley Associates
Alsop Verrill
St James Homes
Soho Housing Association
Threshold Tennant Trust
Winbourne Architects
Drivers Jonas
Osborne Group
Planning Aid for London
Marks & Spencer PLC
Halcrow Fox
Crems
RNJN Architects
Watson Farley & Williams
TP Consultancy
Forsters
University of Westminster
Treherne Architects
Colliers CRE
David Hicken Associates
Landmark Hotels
Road Haulage Association Ltd
Reliance Security Group plc
Focus Central London
Kettners
London Chamber of Commerce and Industry (LCCI)
Steiner, Virk & Sims
Roger Tym & Partners
Mentorn Barraclough Carey
Rainbow Children's Centre
Peabody Design Group
Video Arts Ltd
Handman & Collins Ltd
John Lewis Partnership
Mappin Planning & Development
Estates Store & Development
Vincent & Gorbings
Loftus Family Property
British Beer and Pub Association
Boodle Hatfield

Apcar Smith Planning
Malcolm Scott Consultants Ltd
British Entertainment and Dance Association (BEDA)
Planning Exchange
Coyne & Co
Derwent Valley Holdings PLC
Davis Coffey Lyons
Wickham Van Eyck
Metropolitan Police Service
Gala Group Ltd
PCCG Licensing Working Party
A-Z Restaurants
JPA
M R Partnership
Harp, Sarraf Sheppard Associates
Mondial Estates Ltd
HDG Ltd
GR Planning
Save London Theatres Campaign
RAC
GMS Planning
Barton Wilmore
Natharro Nathanson
Linklaters
GL Hearn
Strategic Planning Advice Ltd
Planning Bureau
Acorns Parent & Toddler Group
Soho Family Centre
Toddlers & Mums Montessori
Vestry
Metropolitan Public Gardens Association
St. John's Montessori Nursery
Mother & Baby Group
Cherubs Parent & Toddler Group
Play Mates
Bayswater Families Centre
Brunel Drop In
Dorothy Gardner Nursery Centre
Churches Together in Westminster
British Transport Police
Chinese Liaison Police Officer
Clubs and Vice Unit
Metropolitan Police Service
Clubs and Vice Unit Metropolitan Police Service
Borough Licensing Officer
Metropolitan Police Service
Superintendent Belgravia
British Buddhist Association
Zoroastrian Trust Fund of Europe
Standing Advisory Committee on Religious Education

Westminster Interfaith
Sudan People's Support Association
Charing Cross Police Station
Marylebone Police Station
Paddington Police Station
West End Central Police Station
Westminster Headquarters
Access Committee for England
Air Transport Users Council
Association of London Government
Westminster Headquarters
Archdeacon of Charing Cross
Our Lady of the Assumption & St Gregory Church
Cardinal Hume Centre
British Waterways London Region
Business Link for London
Capitec
Confederation of British Industry
Council for British Archaeology
CPRE
Friends of the Earth (London Region)
GLA. Business & Europe Division
Greater London Association for Disabled People
Greater London Enterprise
Groundwork South East London
Gypsy Council for Education, Culture, Welfare & Civil Rights
Health & Safety Executive
HM Prison Service Headquarters
HM Prison Service
LCC/CBI London Manufacturing Group
LETEC
London Ambulance Service
Alliance Ltd
CPRE
DfES
Department of Culture, Media & Sport
DTLR
Salvation Army Central Division
Radha Krishna Temple
London Central Mosque and Islamic Cultural Centre
West London Synagogue
Western Charitable Foundation
The Central London Gurdwara
Audit Commission
BBC
BBJ Media
BDO
Berwin and Co
BMP DDB
Bridge the World

IQRA Trust
BT Conferencing
BUPA
Cartoon network
CATCH 22
Channel 4
Danny's Team
Dixon Wilson
ERM
Faber Maunsell
Gardiner and Theobald
Gooch Webster
Green Oak Moreton
Grosvenor Estates
Hampsted Hockey
Initiative Media
Investment Property
John Lewis
Lankshear
Lewis Silkin
London Underground
LT Chips FC
Marks and Spencer
O'Connor Cruises
Publicis
Reuters
Slaughter and May
Starcom Motive
Stephenson Harwood
The Football Association
Top Corner
Travers Smith Braithwaite
Incomes Data Services
UCL Union Hockey Club
Badabings
Beattie Media
Campsie
Cannings Connolly
Del Campbell
Dillion
Framestore
George Gros
Gut Records
London Buses
Sothebys
Ally's Team
Arden Sutherland & Dodd
BDO
Bickerdike Allen
BMP
Branzen Head 2000 FC

Clark McCay & Walpole
Datamonitor
Drakes
Fidlers Five
Green Oak Morton
Hawaii 5 0
Maida Vale Dogers
Law Club
Michael Squires & Partners
Paddington Thursdays
Somerville Old Boys
Rolls FC
Abbot Mead Vickers
Community Involvement Manager Voluntary Action
Westminster
Pakistan Community Organisation
Western Charitable Foundation
Chinatown Chinese Association
Bengali Institute
Moroccan Community Association
West and North London Vietnamese
Chinese Community Office
Eritrean Community Association
National Coalition for Black Volunteering
Somali Advisory Bureau
Egyptian Association
Arab Welfare Advisory Centre
Westminster Somali Association
Queen's Park Bangladesh Association
North Westminster Bengali Women
Bayswater Residents Association
Belgravia Residents Association
Covent Garden Community Association
London First
Migrants Resource Centre
Millbank Estate Residents Association
New World Housing Association
Pimlico Citizens Advice Bureau
Pimlico Family Workshop
Pimlico Toy Library
PIP SW1
Pre-School Learning Alliance- Tiny Tots Under 5
Sanctuary Housing Association
South Westminster Befriend a Family
South Westminster Victim Support
St. Vincent's Family Project
St. Vincent's Over 60's Club
Sudanese People's Support Association
SWETA
The Flanders Club
BME Westminster

Westminster Children's Society
Westminster Education Business Partnership
Westminster Children's Society
Westminster Housing
Westminster Partnership
Westminster Priority 4 Group
Yemeni Community Association
Abbey Community Centre
Afro-Caribbean Mental Health Association
Bengali Cultural Association
Bosnia & Herzegovanian Organisation
Cardinal Hume Centre
Caxton Youth Trust
ERM
Framestore
Gut Records
London Buses
Sothebys
Badabings
Beattie Media
Cannings Connolly
Dillion
ERM
Hyde
ICSM Netball Club
IMS Health
KSS Architects
Netacus Netball Club
Price & Myers
Scicon
Stowe Old Boys
University of Westminster
L'Chic
Top Corner
Tolu Onlie Era
Elgin Eagles
Centric Consulting Ltd
Advance

Town and Country Planning (Local Development) (England) Regulations 2004

City of Westminster Statement of Community Involvement

Statement in pursuant to Regulation 28 (i) (d) : Pre-submission public participation

Summary of representations

Westminster City Council's Draft Statement of Community Involvement (SCI) was released for public consultation in November 2005. Consultees were given six weeks to respond to the document. Consultation closed on 30th December although a number of later responses have been considered since that date.

Around 1600 people from the LDF database were invited to comment. These included individuals and groups from the business, property, voluntary, community and government sectors. Around one half of these were sent a letter and a hard copy of the Draft SCI; the other half were contacted by email or sent a summary leaflet only. [see para 4.2 of the cabinet member report, March 2006]

Number of responses

- A total of 57 responses were made to the Draft SCI document as follows:
- 33 standard response forms were received.
- 24 detailed written representations were received.
- 70% of all responses were sent only in the post; 21% were sent only by email; and 8% were sent using both post and email.

Response form analysis

- A standard response form was made available for respondents to record their views on the Draft SCI, and this next section summarises responses to the document.
- Despite being offered different means of responding to the document, most respondents (74%) returned the questionnaire by post, as opposed to electronically on Westminster's LDF website (16%). Those using both post and email, and fax, represented a further 10%.

Who responded?

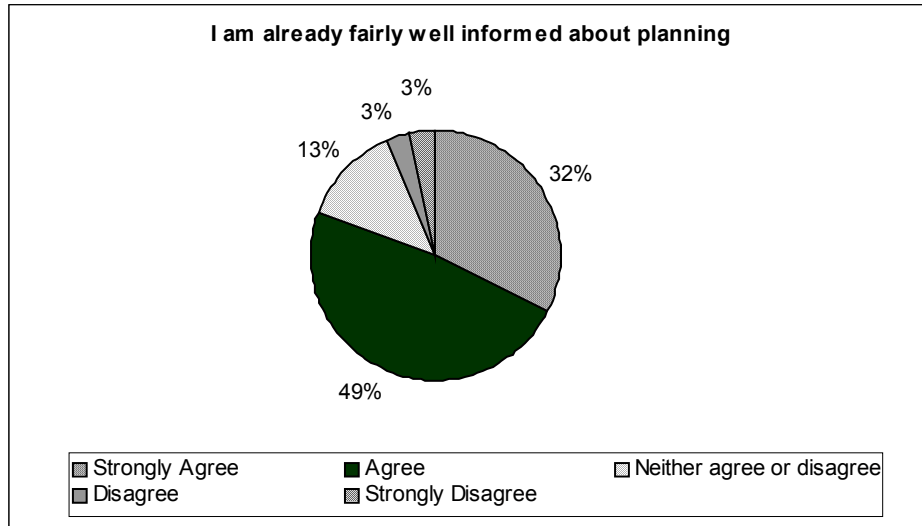
- Predominantly groups/organisations rather than individuals.
- However, a wide range of groups were represented, including: the community and voluntary sectors:
- Soho Family Centre; London Forum of Amenity and Civic Societies; Volunteer Centre Westminster.
- property owners:

Shaftesbury PLC; St Martin's Property Corporation Ltd.; National Grid Property Ltd.; New West End Company; St James (Grosvenor Dock) Ltd.; WPOA.

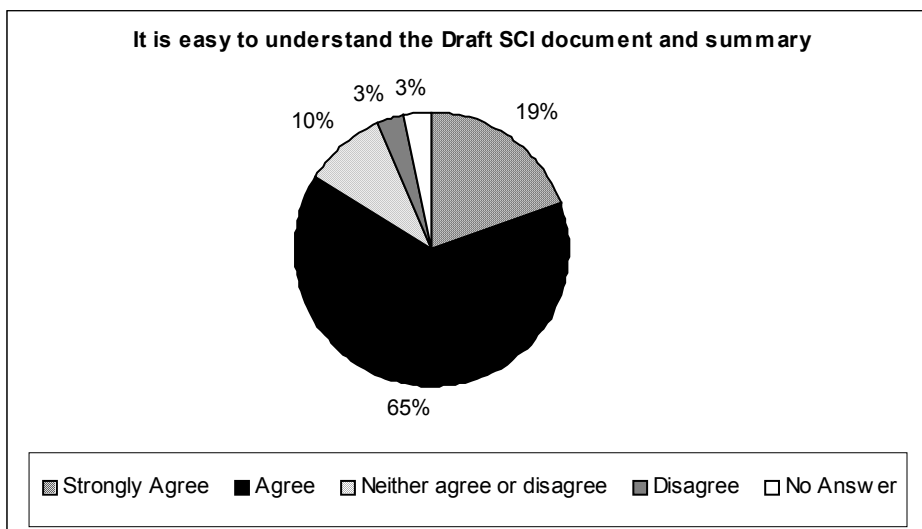
- public bodies/institutions:
- Westminster Primary Care Trust; Transport for London.

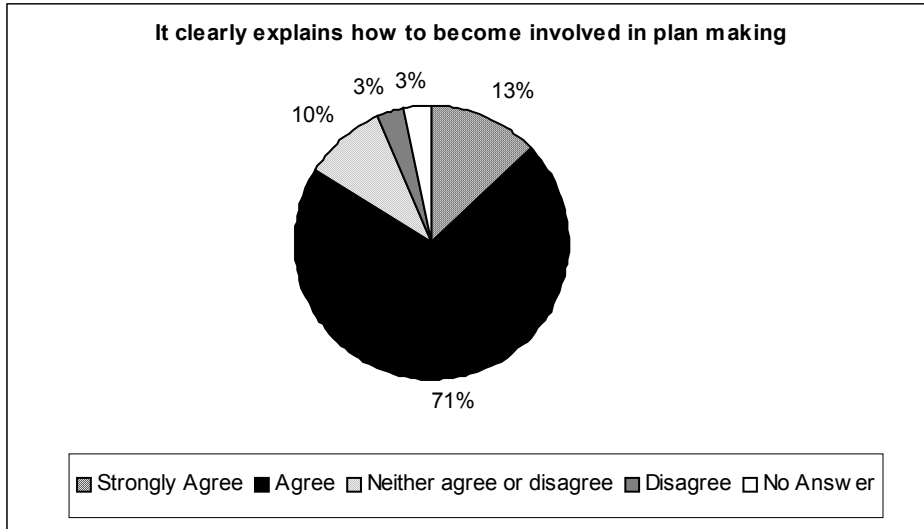
Responses to the SCI document

- Most people consider that they are already fairly well informed about planning:

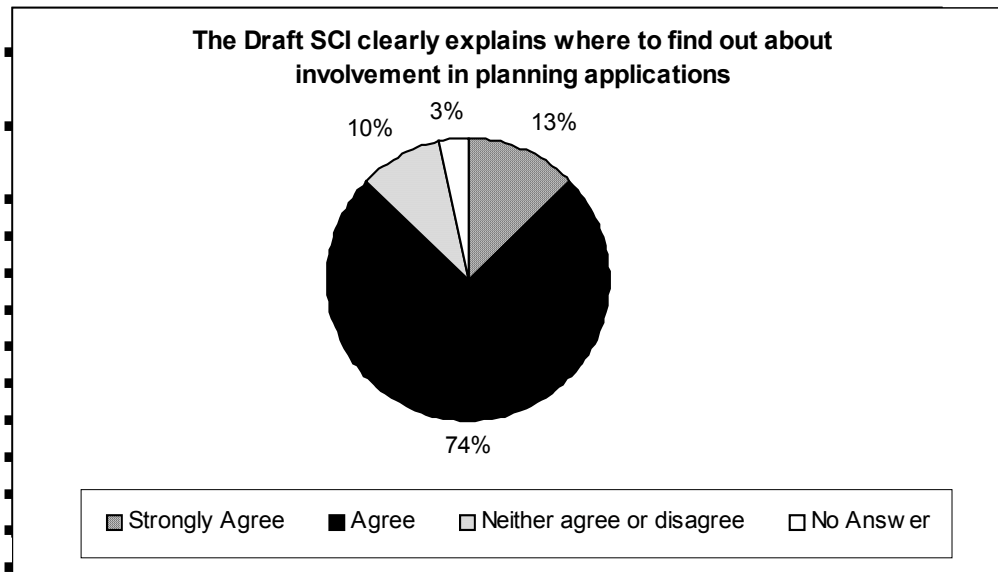


- Despite the SCI being a lengthy document that must satisfy 'tests of soundness' and engage the public, most respondents felt it was understandable and clearly explained how to become involved in plan making





- Satisfaction with methods of public involvement was not as clear cut: although a third of respondents were either in 'strong agreement' or 'agreement' with the proposed methods, people provided additional suggestions in the comments box (see below).



- discussion event about planning issues in Westminster.

Additional comments made on the Draft SCI and summary leaflet

- Summary leaflet useful and worthwhile.
- Document overall well-written and clear.
- A lot of space is devoted to 'methodology' but respondents appreciate that the Council has to spell this out in order to meet tests of soundness.

- People want to get developers involved in consultation on their proposals at an early stage.
- Fuller listing of consultees both in appendix and in the main document itself would ensure that different interest groups are properly represented in the document.

Written representations received by early January 2006

- Further to receiving completed response forms on or before 30th December 2005, a number of written representations were made. These are given in full in the schedule of responses and were considered in detail when revising the Draft SCI.

Detailed comments on the document itself (as opposed to general letters of interest) have come in from the following organisations. Underlined groups are those that have made specific reference to areas of text. Non-underlined groups are those that have general comments on the approach set out in the draft SCI.

By post:

- Hyde Park Estate Association
- London Forum of Amenity and Civic Societies
- Government Office for London
- St James (Grosvenor Dock) Ltd
- WPOA – want further discussions on pre-application consultation
- Thames Water – please add them to specific consultee list
- Transport for London – generally supportive
- The Westminster Society
- Home Builders Federation (HBF)
- Environment Agency
- Metropolitan Police Authority (c/o CGMS Consulting)
- Voluntary Action Westminster
- Policy Unit, WCC
- Covent Garden Community Association
- English Heritage

By email

- Education - Youth Service
- Policy Unit WCC
- Penny Shepherd
- Cllr Audrey Lewis
- Cllr Colin Barrow
- Corporate Property, WCC
- South Westminster LARP / Cross River Partnership

Several organisations wrote either directly, or through their agents, to express their interest in getting involved in the LDF process. These included:

- National Offender Management Service (NOMS), which incorporates HM Prison Service (c/o Lambert Smith Hampson)
- London Ambulance Service (c/o Malcolm Judd & Partners)
- Imperial College (c/o Gerald Eve)
- The Marylebone Association
- Covent Garden Area Trust

- NHS London Healthy Urban Development Unit (through the PCT)
- National Grid (c/o Malcolm Judd & Partners)
- The Countryside Agency – Landscape Access Recreation
- Fairview Homes (c/o RPS Planning)
- British Waterways London
- Union Railways (North) Limited
- WM Morrison Supermarkets Plc. (c/o Rapleys)
- Highways Agency
- The Chartered Institution of Waste Management
- The Theatres Trust
- Jones Lang Lasalle

Late responses were reflected in the final analysis of responses and any feedback, as well as any changes to the SCI itself.

Changes made to the SCI as a result of the comments received are shown in the schedule of all responses.

ANNEX B
The Town and Country Planning (Local Development)(England) Regulations 2004
Regulation 28 (1) (d)

SCHEDULE OF RESPONSES TO WESTMINSTER CITY COUNCIL'S DRAFT STATEMENT OF COMMUNITY INVOLVEMENT (SCI)

Explanatory notes

Para No. – The paragraph in the Draft SCI document to which the comment applies to, if relevant.

Source – The source of the comment received, together with the method by which the representation was made

Issue raised – Detailed description of the issue/feedback received. Some responses are taken from the response form, in which case they are labelled Q8 or Q9.

Officer response – Comments made by officers in their response

Change in SCI / action taken – revisions made to the draft document

Para No.	Source	Issue raised	Officer response	Change in SCI / action taken
	Louise Spalding, Defence Estates (by response form)	Q8. Strengths and weaknesses of the Draft SCI and improvements: Strengths - very comprehensive. Summary - helpful.	Noted	Ensure that summary of the SCI is sent for submission together with the full document
	Louise Spalding, Defence Estates (by response form)	Q9. Best methods to ensure that the public are involved in future decisions about planning: Holding exhibitions in public places e.g. shopping centres and having members of staff present to discuss/answer questions. Rather than public meetings, more workshop based discussion.	Ideas noted. Agree that workshop based discussions usually more effective than public meetings	Suggestion about presenting exhibitions in public places such as shopping malls will be reflected in submission version
	Mr M.J. Sharman (by response form)	Q8. Strengths and weaknesses of the Draft SCI and improvements: Would benefit from a short summary to involve local residents who feel 36 pages are daunting. Such a summary may persuade more residents to read the full document.	Noted	Ensure that summary of the SCI is sent for submission together with the full document
	Mr M.J. Sharman (by response form)	Q9. Best methods to ensure that the public are involved in future decisions about planning: Reminding local residents of how they can get involved by including single page information summaries along with standard documents like council tax claims and ResPark applications and/or renewals.	Short reminder sheets are a good idea, but timing is always an issue, and knowing what mailouts are occurring across the council. The summary document was sent to 500 housing tenants at same time as a housing communication, so the idea can work well in practice.	Will reflect idea in submission document, and discuss internally ways of using this method whenever we can.

	Mr Louis K. Fleming (by response form)	Q8. Strengths and weaknesses of the Draft SCI and improvements: The draft SCI, written in plain English is an excellent document; as far as it goes. As a Westminster resident and freeholder in the Birdcage Walk Conservation Area for 40 years, I am concerned that development has been almost completely reactive or Developer driven. I would like to see Council far more pro-active. Take for example, the area including Catherine Place / Buckingham Place / Wilfred Street and Palace Street. This is a highly distinctive historic area that should be returned completely to RESIDENTIAL. There must be a prime role for WCC to promote and facilitate development.	Supportive comments most welcome. The purpose of the new procedures for public engagement is to ensure that residents and other people in the community are involved from a very early stage in the formulation of plans and proposals for change; also that developers should undertake consultations as well before proposals are advanced. This should avoid the concern of residents that developers are dictating change.	
	Mr Louis K. Fleming (by response form)	Q9. Best methods to ensure that the public are involved in future decisions about planning: LISTEN TO THE PUBLIC FOR A CHANGE!! The problem here, once again is that Developers/Applicants are in reality driving planning and development. From my experience, Planning Officers do not listen to residents and make recommendations to the WCC Planning Committee without paying due attention to the complaints of residents. Developers are receiving planning permission with conditions; then add-on items like air conditioning units and seek approval "after the fact". This is a sham. These add-ons should not be allowed in the Plan. I strongly advocate the use of FOCUS GROUPS by WCC.	See above	Comment as above
	Mr Richard G. Ratcliffe, St Martin's Property Corporation Ltd. (by response form)	Q8. Strengths and weaknesses of the Draft SCI and improvements: I found the document constructive and consider the sequence of preparing the Development Planning documents and Supplementary Planning Documents should be shown, giving DPD priority over the SPD since DPD is subject to an Inspector's Inquiry.	Positive comment welcomed. Agree that DPDs have higher status than SPDs, but timing of preparation of documents may well place SPDs first in the process	Look at depiction of DPDs and SPDs to ensure that it is clear that DPDs are the most important documents to get involved in.
	Mr Richard G. Ratcliffe, St Martin's Property Corporation Ltd. (by response form)	Q9. Best methods to ensure that the public are involved in future decisions about planning: Email; press notices	Comments noted	Will take account of this in preparing submission version.
	Mr Ian E. Benson (by response form)	Q8. Strengths and weaknesses of the Draft SCI and improvements: Where is the summary please? It is not listed in the contents	Noted.	Ensure that summary of the SCI is sent for submission together with the full document
	Mr Ian E. Benson (by response form)	Q9. Best methods to ensure that the public are involved in future decisions about planning: Leaflets though all letterboxes in the streets affected	Noted. Council already do letter drops to those households in vicinity of planning proposals and will continue to do so	Will ensure that this is clearly reflected in document

	Mrs Pat Burn, Westbourne Neighbourhood Association (by response form)	Q8. Strengths and weaknesses of the Draft SCI and improvements: A little heavy on the 'methodology' but suppose it has to conform to an agreed format	Comment noted and agreed. Yes, there are tests of soundness to pass, which is why the document is heavy on methodology.	No additional change to document.
	Mrs Pat Burn, Westbourne Neighbourhood Association (by response form)	Q9. Best methods to ensure that the public are involved in future decisions about planning: You appear to have covered all systems of communication – but that does not necessarily produce a response	Comment noted. Agree that despite best efforts, one cannot guarantee a response. Skill will be in relating the topics and issues to peoples' local areas and lives.	No additional change to document.
	Miss D. M. Gable, South Westminster Triangle Association (by response form)	Q8. Strengths and weaknesses of the Draft SCI and improvements: I found the summary helpful. The draft SCI has a lot in it, its weakness may be that not all of it will be implemented before revisions/new plans come in before 2025, the date of the LDF document.	Noted. The mechanisms in the SCI will guide participation on all the LDF documents, so it will be an effective tool for ensuring that Westminster's communities are engaged as far as possible in the issues affecting development and change	Prepare a simpler summary SCI, post adoption
	Miss D. M. Gable, South Westminster Triangle Association (by response form)	Q9. Best methods to ensure that the public are involved in future decisions about planning: By holding 'open' meetings in the local areas that will be affected by parts of the SCI, especially when building new homes / hospitals are involved.	Comment noted.	Ensure that 'open' meetings are indicated as an effective option in submission version of SCI
	Mr Chris Rees, Volunteer Centre Westminster (by response form)	Q8. Strengths and weaknesses of the Draft SCI and improvements: Was good	Noted.	No additional change to document.
	Mr Chris Rees, Volunteer Centre Westminster (by response form)	Q9. Best methods to ensure that the public are involved in future decisions about planning: Continued activities like this and local meetings / events	Noted	No additional change to document.
	Mr Stewart S. Cohen (by response form)	Q8. Strengths and weaknesses of the Draft SCI and improvements: The complexity of the consultation process makes it essential that consultation should be on the issues that the parties concerned are interested in. I.e. In our case the issues are those covered under the St James's conservation area and the impact of its surrounding commercial area.	Noted. Agree that it will be important to related topics and areas for discussion to the communities most affected by them	No additional change to document.
	Mr Stewart S. Cohen (by response form)	Q9. Best methods to ensure that the public are involved in future decisions about planning:		No additional action

10-15	Mr Andy Elvin, Soho Family Centre (by response form)	<p>Q8. Strengths and weaknesses of the Draft SCI and improvements: Paragraphs 10-15 do not mention the voluntary and community sector – this is a serious omission.</p> <p>The document is also weak on explaining sec. 106 and how it may benefit residents / community groups and amenity societies</p>	<p>These paragraphs describing “community” not intended to be a comprehensive description of all those who make up Westminster’s community. Council seeks to ensure that matters for s106 are referred to in public reports and as part of consultations on planning briefs. Agree extra references would assist.</p>	<p>Add a paragraph mentioning active voluntary and community sector whose engagement with local people gives them knowledge about places and spaces. Mention relevance of s106 to planning briefs in para 58 A a) and b) and para 61.</p>
	Mr Andy Elvin, Soho Family Centre (by response form)	<p>Q9. Best methods to ensure that the public are involved in future decisions about planning: If the City Council are the developer consult before publishing plans (see Berwick Street fiasco) – also encourage private developers to do likewise</p>	<p>Noted and agree. The new procedures will require this to happen – or at least for people to have a chance to comment fully on draft proposals more effectively than hitherto.</p>	<p>No additional change to document.</p>
57-63	Mrs Carol Seymour-Newton, Knightsbridge Association (by response form)	<p>Q8. Strengths and weaknesses of the Draft SCI and improvements: A competent document, well set out. Chapter 3 especially interesting and important. Summary OK.</p>	<p>Positive comments welcomed</p>	<p>No additional change to document.</p>
	Mrs Carol Seymour-Newton, Knightsbridge Association (by response form)	<p>Q9. Best methods to ensure that the public are involved in future decisions about planning: There is not much wrong with the present system; is it really necessary to scrap the UDPs which have only recently been completed. Do not rely too much on email and the Internet; not everyone has a computer – and can one study a complicated planning submission on a small screen?</p>	<p>Unfortunately the Planning and Compulsory purchase Act 2004 gives us no choice but to end the UDP system. Comments about access to computers noted and accepted. A variety of measures will have to be used for all consultations</p>	<p>Ensure that do not rely too heavily on electronic consultation means</p>
	Mr Chris Thomas, Outdoor Advertising Association and British Sign and Graphics Association (by response form)	<p>Q9. Best methods to ensure that the public are involved in future decisions about planning: Individual letters at key stages</p>	<p>Noted. Individual letters can be sent out for area based and smaller scale engagement work, but for city-wide issues it will probably not be cost-effective to mail everyone individually.</p>	<p>Submission version of SCI will continue to highlight post as a means of communication.</p>

	Mr David Hogarth, Westminster Older People's Network and Westminster Senior Citizens' Forum (by response form)	Q8. Strengths and weaknesses of the Draft SCI and improvements: There is serious weakness in the arrangements for consulting older people. Though specifically mentioned in PPS12 Age Concern is only one service provider. The Westminster Older Peoples' Network, the umbrella body for service providers must also be consulted. Secondly, there is no provision for consulting the Westminster Senior Citizens' Forum – the umbrella body for older people themselves. If uncorrected these deficiencies will be the subject of a representation to the Inspector. The Older People's Delivery Network, when established, need to be consulted in the same way as all other organisations.	Westminster Senior Citizens' Forum: on the database, D.A. Hogarth as contact. Westminster Older Peoples' Network: added to the database.	modify the text to incorporate these two organisations
	Mr David Hogarth, Westminster Older People's Network and Westminster Senior Citizens' Forum (by response form)	Q9. Best methods to ensure that the public are involved in future decisions about planning: Like the majority I favour post and email. The important thing is to keep the consultation as brief as possible.	Comments noted, particularly about brevity – by which is presumed text rather than timescale. Comments appreciated.	No additional change to document.
	Mr John Drake, CPRE London - Central District Committee (by response form)	Q8. Strengths and weaknesses of the Draft SCI and improvements: It is comprehensive but very bureaucratic, which makes some sections difficult to fully understand even with a professional interest in planning. If some of the operations can be simplified within the government diktat it should be a better planning instrument than the UDP is at present. The summary is helpful.	Comments noted.	Look for ways of making document less bureaucratic
	Mr John Drake, CPRE London - Central District Committee (by response form)	Q9. Best methods to ensure that the public are involved in future decisions about planning: Maximum publicity at the earliest possible time, all information provided in a clear understandable form, especially technical summaries such as environmental impact statements, etc. Sufficient time is provided from consultation with the public, both by the developer, pre-application and City of Westminster. Both before and after application. This includes organisations such as CPRE London, through this committee which represents CPRE members in the City of Westminster.	Comments noted. Will endeavour to ensure that 12 weeks are given for planning policy and area based consultations	No additional action
52	Mr K.D. Nickol (by response form)	Q8. Strengths and weaknesses of the Draft SCI and improvements: Paragraph 52 on page 17 seems very strange to me. I can see no logical order in the way interest groups are listed. I could not find a method of making representations on a concern that was Westminster wide for example allowing dwellings to be built which have rooms with no windows particularly bathrooms and kitchens. I believe this reduces the quality of the housing stock.	The list on page 17 illustrates a range of groups who we intend to consult. The windowless room issue is one for Building Regulations. A new guide on standards for new housing design will be produced in 2006/07 and this concern will be looked at	Try to make list on page 17 more logical in layout.
	Mr K.D. Nickol (by response form)	Q9. Best methods to ensure that the public are involved in future decisions about planning: I believe any need to know information should not be broadcast on the electronic medium alone. Forty-five percent of the population do not have a computer. The public as a whole is not kept informed relying on this medium.	Comments noted. Agree that to rely on electronic mailouts would exclude a large sector of community, so we shall continue to use post as well	No additional change to document.

	Sharon Cohen, Head of Youth Service, Westminster Youth Service (by internet and response form)	Whilst it [the document] stresses the need to use engagement methods that are suitable for the purpose and the individuals and organisations involved, it only seems to consider the needs of various adult groups. It doesn't specify how it will address the needs of children and young people (CYP) as an important section of the community – the people that are the future of Westminster. [nb. Paraphrased from original]	Comments noted.	Reflect need to engage with CYP in submission version of SCI
	Sharon Cohen, Head of Youth Service, Westminster Youth Service (by internet and response form)	Involving CYP can help CYP in different ways, and their involvement is a national requirement for Local Government, which is assessed as part of the CPA and JAR processes. Involving CYP will contribute to WCC delivering the priorities set out in the Children and Young People's Plan	Comments noted. Will look at ways in which CYP can be involved in planning process	As above
	Sharon Cohen, Head of Youth Service, Westminster Youth Service (by internet and response form)	In the SCI chapter on planning applications it describes how the community will be involved in planning applications. However, the processes as described would be likely to involve adults not young people. Where the proposal directly affects young people, for example new school, community or leisure provision or changes to roads and lighting that may affect their safety or journeys, it should be a requirement that their views are sought. This should include both pre-application and formal application stages. In section 62 B list a) there should be an additional commitment for which I suggest "Where the impact of the proposal would affect young people we will consult with them through local schools and youth groups and the Youth Passport website."	Comments noted.	Amend SCI to reflect commitment to consult young people. On planning applications, Para 62 B b) 4 covers the Council's commitment to consult other groups who might include young people.
	Sharon Cohen, Head of Youth Service, Westminster Youth Service (by internet and response form)	The SCI intends to consult service providers such as schools and therefore, methods of consultation must be developed in order to engage with the majority of people involved with schools i.e. children and young people. However, in Westminster about half of the secondary school age youth population do not go to Westminster schools, so the consultation needs to be much wider, including youth provision and activity settings. This needs a more varied approach to involvement.	Comments noted. Will endeavour to vary approach although this will have time and resource implications. Will contact to discuss.	As above
	Sharon Cohen, Head of Youth Service, Westminster Youth Service (by internet and response form)	CYP groups do not appear on the list of consultation bodies that must be consulted or the list of other consultees who may be considered. This needs to be rectified for the research to be fully valid.	Comment noted. The list in Appendix 1 is not intended to be comprehensive. Will add to database.	Amend list of consultation bodies
	Sharon Cohen, Head of Youth Service, Westminster Youth Service (by internet and response form)	Make website, publications and language all appropriate to CYP, and possibly involve them in the design process.	Comment noted. Will always try to write in a way that is as accessible as possible to as many different groups as possible.	No additional change to SCI

	Sharon Cohen, Head of Youth Service, Westminster Youth Service (by internet and response form)	Venues need to be appropriate to CYP – i.e. not One Stops or Area Forums, but more youth clubs, sports centres and arts facilities. Workshops and focus groups may be an effective method of engaging with CYP.	Comments noted. Suggestions will have cost and time implications. Nonetheless agree that for certain topics it would be good to take the proposals into youth centres, etc.	Change to text to consider mentioning sports and youth clubs.
	Cllr Audrey Lewis (by email)	The title of this document is rather confusing in the light of all the other consultation that goes on and I wonder if we could refer to it as 'Draft statement of Community Involvement in Planning'. Already a lot of consultation going on [see email for examples of corporate consultation].	Comment noted. SCI is controlled by statutory regulation.	Consider adding wording to front cover to clarify purpose of document.
	Cllr Audrey Lewis (by email)	Experience in Civic Watch has been that the special interest or Community groups are not very good at getting to the grass roots of the city and that focus groups or research such as telephone surveys are more thorough than the self-selected groups of activists.	Comment noted. Agree that telephone surveys can be effective and should be utilised.	Mention telephone surveys in SCI
	Cllr Audrey Lewis (by email)	WASF no longer has a regular cycle of meetings with planning officers and councillors although it might be possible to reintroduce this. Planning, in particular, has not been an important topic of their already infrequent and irregular meetings in the last two or so years.	Noted. Discussion with WASF to determine future role.	No change in SCI text necessary
	Cllr Audrey Lewis (by email)	I may have missed the inclusion in the document of any mention of the, increasingly elected, groups who represent steering panels of residents or local businesses in the Neighbourhood Regeneration areas.	Noted.	Mention neighbourhood renewal areas
	Cllr Colin Barrow (by email)	On making citizens active what about those people who won neighbour of the year.	Noted. Good idea. Will get list of winners.	No change to text.
	Daniel Start & Policy Unit, Westminster City Council (by email)	Overall a useful, comprehensive and professionally written document, especially: <ul style="list-style-type: none"> The detailed explanation of the stages and processes of decision making, and where / how the public can contribute and influence these. This is central to transparent and open decision-making. The flowcharts at the end are excellent The emphasis given to the importance of differentiating between different stakeholders and communities, their different needs, and the different challenges of outreach; The useful table under para 53 detailing different communication / involvement methods, and linking them to key stages in the decision-making process. 	Comments welcomed	No change to document.
	Daniel Start & Policy Unit, Westminster City Council (by email)	More detail on who you will need to co-ordinate with from other partners and other parts of the Council. There are several slightly ad hoc lists, and most bodies and initiatives are mentioned, but something a little more systematic (perhaps based around an organogram?) would show we understand what the rest of the organisation does and where the overlaps are. This could also form the basis of a useful tool for ensuring good quality co-ordination and synergy into the future	Comments noted. Discussion would be useful to find way to improve understanding of organisational structures and links.	At this stage, additional detail on the council's own structures might add confusion, particular as they are likely to change over life of the document.

	Daniel Start & Policy Unit, Westminster City Council (by email)	More detail on how you propose to create the organisational or departmental infrastructure which will underpin how you better engage and consult. There is passing reference to the use of facilitators (para 30) under 'Resources and Management' but not much discussion of who these people will be, how they would be funded or how you would build their capacity and skills. How would the mindset of managers be changed and the perceived risks or participation be minimised? Participation is a scary business for managers. What business processes and information systems would be developed to better implement all this new consultation? How would performance metrics be adapted to reflect the importance of local influence over decision-making? Addressing these kind of issues in your paper would give local people much more confidence that there really are changes afoot to the way planning decisions are made.	Comments noted and accepted. Detail about facilitations perhaps not necessary in submission SCI but agree that training will be required and infrastructure built up to make community engagement truly effective.	Consider what additional infrastructure required in order for the council to fulfil its commitment to involve people more effectively. This is part of ongoing discussions internally and may be reflected in future reviews of the SCI post adoption.
47 onwards	Daniel Start & Policy Unit, Westminster City Council (by email)	There is passing reference to participatory methods (para 48.5) but a more general discussion of which methods would be appropriate for which stage of the planning process and for which stakeholders, would be very helpful, and a very useful complement to the para 53 table. How about a more detailed case study planning process, with the possible consultation mechanisms detailed? This could build on your excellent flowcharts at the end of Chapter Three.	Comments noted. Already considering a case study box to illustrate effect of involvement. Further discussion would be welcome.	Consider using case study box in simpler version post-adoption.
	Daniel Start & Policy Unit, Westminster City Council (by email)	Related to this, do you need to make it clear whether decision-making will be based on principles of 'proportional representation' (i.e. the majority wins and representative surveys and informal referenda predominate) or on principles of 'consensus' (i.e. similar weight given to minority views as to majority views?) This is a little philosophical, but fairly fundamental;	Will discuss further	No change to text
	Daniel Start & Policy Unit, Westminster City Council (by email)	Did you do a stock-take of your current approach to consultation? Some analysis of your shortcomings and strengths, and clarification of what specifically you will be improving (and what specifically you will be leaving alone) would help people better understand what they can expect to change.	Yes we did. Also did a questionnaire survey seeking peoples' preferences	No change to text
22	Daniel Start & Policy Unit, Westminster City Council (by email)	One minor point, in para 22 (Community Involvement Aims), number three on using email sticks out as being an action rather than a purpose / outcome. Also, perhaps emphasise the appropriate use of email. One could argue that face-to-face and interactive forms of consultations are just as important.	Comment noted.	Amend text to clarify use of email
	Daniel Start & Policy Unit, Westminster City Council (by email)	From my reading this is clearly a planning / LDF specific document and not an organisation-wide community engagement strategy / statement. However it looks like you have done a useful analysis of your department's work in the process. Did you and your colleagues find it useful? I wonder whether it would be useful for other departments and policy areas to go through a similar - though more informal - process? Perhaps after the SCI is finalised you would like to share your experiences.	Comment noted. Will consider opportunities for hosting seminar.	No change to text
	Daniel Start & Policy Unit, Westminster City Council (by email)	Make the most of the exciting opportunities to work together among council departments to share information, ideas and resources more effectively.	Comment noted and accepted. Already doing so.	No change to text
	Penny Shepherd (by email)	Give people the opportunity to complete surveys and questionnaires by email as well as through standard response forms	Agree	No change to text
	Penny Shepherd (by email)	I think the document is trying to explain it with too much text and not enough diagrams. I suspect that this level of complexity and turgidness needs a professional designer to communicate it effectively.	Comment noted.	Look at use of more diagrams in a simpler guide post-adoption.

10-15	Penny Shepherd (by email)	Paras 10-15 do not make it clear that local residents (other than those who hard to reach) are directly part of "Community" as well as via community organisations.	Comment noted.	Change to text to reflect role of residents.
	Penny Shepherd (by email)	Your definition of community does not recognise and address the transience and/or disengagement of some parts of the Westminster community such as those with second homes in Westminster or with relatively short rentals of private residential accommodation including those from overseas. While individually such people may not see themselves as spending sufficient time in Westminster to want to get involved, collectively this group is an important stakeholder in Westminster. The draft SCI does not seem to recognise the particular challenges of engaging this part of the Westminster residential community – people who are hard to reach but not economically disadvantaged.	Comment noted.	Change text to reflect transient nature of many elements of Westminster's residents.
	Penny Shepherd (by email)	Most importantly, the draft SCI does not recognise or address the differential access to resources of different stakeholders in Westminster and the impact of this on effective community involvement. This contrasts with Westminster's approach to the new licensing act where support was provided to residents to try to counterbalance the differential access to resources of the licensed trade. For the LDF, the key issue relates to plans which are developed outside the SCI/LDF process by powerful stakeholders without residents having had the opportunity to shape the strategic assumptions which underpin them. Unless there is an effective approach within the SCI/LDF process to address this, Westminster will have grave difficulty in avoiding its community consultation becoming a sham. An area of particular concern here is the activities of the New West End Company (and potentially also of the task force being run for Ken Livingstone by Ian Henderson, formerly of Land Securities). The New West End Company has been developing master plan proposals for its area of interest in the West End for over two years. Community consultation on them has been woefully inadequate. In relation to the LDF, these proposals have major flaws at their heart which are (a) in spite of some limited rhetoric, their focus does not include residents let alone prioritise them - and this is demonstrated in particular by their complete lack of any noise management objective in spite of the consistent priority given to noise as an issue by West End residents - and (b) they do not recognise the geographical communities of Westminster and hence aim, for example, to "join up" Fitzrovia with Soho while a key LDF objective for Fitzrovia residents would be to design in measures to prevent such a result. Unless the SCI identifies a clear way to ensure that LDF plans are not biased by this sort of activity by powerful stakeholders (rather than - with respect - the sort of platitudes in the document at present), it will not result in effective resident engagement. To address this, I believe that your community involvement principles need to include: - to ensure that resources available to different stakeholders do not result in inappropriate influence by some groups compared with others, e.g. by providing access to resources to enable residents and community groups to play their part and by transparency and other means of managing the influence of powerful stakeholders - to consult on the formulation of strategic priorities as well as on their implementation	Noted. Agree that city council needs to ensure that all groups have opportunities to have their views heard	Mention in text
	Roger Neville, Access Officer, Westminster City Council (by email)	The Draft will give the impression that disabled people were an after thought, and I attach my view of how this issue might appear to a disabled person wishing to challenge the document and how strong a case they would seem to have to a disinterested individual.	Noted.	Amend text so that disabled people are given fuller consideration.

10	Roger Neville, Access Officer, Westminster City Council (by email)	Disabled people are not a group that in that they do not naturally 'come together'. Disabled people are spread throughout the community and do not cluster as BMEs, so it is valuable to recognise this in the document.	Noted.	Reflect this fact in text.
15	Roger Neville, Access Officer, Westminster City Council (by email)	This paragraph would be a good place to flag up the nature of, and the necessity to make, specific provision for disabled people, including those with learning disabilities	Noted.	This paragraph cannot describe the totality of Westminster's communities and their differing abilities to be involved. However, text of para 15 has been expanded to cover "seldom heard" groups.
22	Roger Neville, Access Officer, Westminster City Council (by email)	Vital that we include disabled people in this statement.	Noted and agree.	Add 'disability' to list in para 22 principle number i.
38	Roger Neville, Access Officer, Westminster City Council (by email)	This will be perceived as being very weak, given the lack of the identification of disabled people in what precedes it	Noted.	Paragraph 38 gives brief descriptions of the different development plan documents. Involving "communities" is kept in broad terms here, and described more fully in later paragraphs.
50	Roger Neville, Access Officer, Westminster City Council (by email)	This is the first mention of disability	Noted.	Vulnerable groups are already mentioned, but paragraph 52 is expanded to give fuller information on the voluntary groups that support and represent the vulnerable sectors, including those with disabilities e.g. Disability Network, Children and Young People's Community Forum and Older People's Network.
	Sue Hannah, South Westminster Renewal Co- ordinator, Cross River Partnership (by email)	Statement of interest in being kept informed	Noted. Details kept on database.	No change to text

15	Sue Hannah, South Westminster Renewal Co-ordinator, Cross River Partnership (by email)	The Statement would benefit from more detail about how Westminster City Council will pro-actively consult young people, older people and people from minority groups, as it is important that their views are sought as part of the planning process.	Comment noted: it is difficult to be specific about particular groups, when consultations will vary depending on nature of topic and in order not to make the document too long, it has to be kept fairly general.	Paragraphs 16-19 describe wide range of techniques in order to attempt to engage these minority groups. Expand lists of existing networks and strengthen commitment to use existing network meetings to involve people in LDF.
23	Sue Hannah, South Westminster Renewal Co-ordinator, Cross River Partnership (by email)	The Statement would benefit from more information on Westminster City Partnership's role in the Council's engagement and consultation approach to both policy documents and planning applications. Will Westminster City Partnership members be asked to consult their staff and service users about major new developments in the City?	Comment noted. Agree that role of WCP is important ; will consider whether role can be expanded to assist with consultations on planning applications.	Expand text on role of WCP; added to paragraph 51.
48	Sue Hannah, South Westminster Renewal Co-ordinator, Cross River Partnership (by email)	It is proposed that point 6 makes specific reference to the Westminster's Local Area Renewal Partnerships (LARPs) as structures that Westminster City Council should 'encourage and initiate regular joint working and decision making with'. LARPs offer a local focus on the most deprived areas in the City and provide a route into the heart of local communities. Six LARPs have been established in Westminster's most deprived neighbourhoods to tackle disadvantage at a local level (South Westminster, Church Street, Queen's Park, Westbourne, Harrow Road and the West End & Soho. Each LARP has developed a Renewal Plan, setting a vision and priorities to improve services in its local area, which could be used to inform checklists for community benefit initiatives.	Comments noted. This is very informative.	Make reference to LARPS in paragraph 52 and also to the six Area Forums in paragraph 48.
Chapter 3	Sue Hannah, South Westminster Renewal Co-ordinator, Cross River Partnership (by email)	The Partnership would like LARPs Managers to be kept fully informed and involved in the pre-application stage of development proposals for their local neighbourhoods. This will ensure that all LARP partners have the opportunity to contribute to the evolution of the planning proposal and the development of checklists for community benefits. LARPs will also be able to support community involvement at an early stage in the planning process via public meetings and disseminating information to the local community.	Noted. Agree that LARPS managers could perform a vital role in ensuring that communities comment on applications in their areas. This will require administrative changes but will consider.	Include reference to LARPs at pre-application and application stages in paras 58 A b) and 62 B b) 4. respectively.
5	Martin Reeves, Head of Performance Improvement, Westminster City Council (by email)	Not clear who Inspector is as referred to in paragraph 5	Noted.	Text clarified in paragraph 4.

10-15	Martin Reeves, Head of Performance Improvement, Westminster City Council	Under 'what do we mean by community?' should talk about other stakeholders that impact on our planning powers/decisions e.g. TfL, GLA, LDA, other boroughs, tenants and residents associations - would also mention voluntary sector here as they already have advanced Compact arrangements for engagement	Comments noted. Agree that it would be useful to expand the description of 'community'.	Text expanded in paragraphs 10- 15 to give a fuller description of the many diverse groups that make up Westminster's community. Now mention workers, visitors, and small businesses.
16-19	Martin Reeves, Head of Performance Improvement, Westminster City Council (by email)	A chart showing the requisite elements of Local Development Frameworks would help understanding (charts come later but would be better here)	Comment noted.	Chart re-done and labelled Figure 1.
Pages 20-21	Martin Reeves, Head of Performance Improvement, Westminster City Council (by email)	Should show feedback as a separate process in charts	Comment noted.	Will give more focus to charts in simpler guide to publish post-adoption
58A	Martin Reeves, Head of Performance Improvement, Westminster City Council (by email)	Community involvement by developer - mention that large developments would be encouraged to develop specific proposals for community involvement which may involve arrangements such as 'planning for real' exercises – para 58 A b)	Comment noted.	Add 'planning for real' as a useful exercise in para 58 A b).
20	Martin Reeves, Head of Performance Improvement, Westminster City Council (by email)	Would also mention the LAA as a key contextual factor	Comment noted. Local Area Agreements are still at an early stage and it is not yet known what role they will play, but worth mentioning.	Mention LAA in text at para 20. Add definition to glossary.
54	Martin Reeves, Head of Performance Improvement, Westminster City Council (by email)	Would add WEMNA and links to other sources of info e.g. GLA, LDA.	Noted.	This is intended to be a list of information documents produced by the City Council. Whilst other bodies' documents will be available wherever possible, people will be directed to the websites of those organisations.

Chapter 3	Martin Reeves, Head of Performance Improvement, Westminster City Council (by email)	Under planning applications section add information on statutory timescales for consultation on planning applications	Noted and agree.	Add reference in para 62 B a) to deadlines for making responses. Also add new para 63 describing how we will deal with deadlines.
	Martin Reeves, Head of Performance Improvement, Westminster City Council (by email)	Would add timescale attached to consultation activities where relevant	Noted.	Add indication of timescales in chapter 3.
Response form itself	Martin Reeves, Head of Performance Improvement, Westminster City Council (by email)	The open ended questions need to be separated out i.e. we need to ask one question at a time	Noted	Bear in mind for design of future response forms.
Response form itself	Martin Reeves, Head of Performance Improvement, Westminster City Council (by email)	Mentions summary but this is not included	Noted.	Publish simpler guide post-adoption
	Martin Reeves, Head of Performance Improvement, Westminster City Council (by email)	Style point - the document jumps about in terms of what we are called, veering from Westminster to city council to Council - need to just pick one and stick to it.	Noted. Document has been checked and Council has been replaced with council, City Council replaced by city council. However, Westminster City Council has been left capitalised.	Noted. Document has been checked and Council has been replaced with council, City Council replaced by city council. However, Westminster City Council has been left capitalised.
	Nigel Kempner, Westminster Property Owners Association (WPOA) (by written letter)	The Association is keen that there should be even closer dialogue at the earliest possible stage in the preparation of the core strategy and other local development documents.	Comment noted. Will endeavour to do so.	No change to text.
	Nigel Kempner, Westminster Property Owners Association (WPOA) (by written letter)	Continue to improve the pre-applications protocol, which the Draft SCI document seems to suggest is working in an entirely satisfactory manner	Comment noted. Discussions continue with WPOA about how to improve pre appln protocol..	No change to text.

	Nigel Kempner, Westminster Property Owners Association (WPOA) (by written letter)	The Association would wish to discuss with the City Council in some detail the extent of common ground and the principles to be adopted in consulting the community prior to planning applications being made. Much experience can be shared.	Comment noted. Further discussion will be welcomed.	No change to text.
51	Pamela Park, Deputy Chief Executive, Voluntary Action Westminster (by email)	Although all WCP networks do have contact with the voluntary and community sector, it is the Westminster Community Network which was established to provide a link between the VCS and the LSP. In your much earlier draft, you included a greater level of detail about WCN and its 13 member networks - I think it would be useful to include a bit of that detail here. Perhaps just a sentence or two before the Compact section. I could throw together an overview in a sentence or two if you desire, just let me know.	Helpful comment noted. Will consider ways of doing this.	Add more detail on WCN as offered – now in paragraph 51.
52	Pamela Park, Deputy Chief Executive, Voluntary Action Westminster (by email)	For consistency, all of these groups should be listed in Appendix 1 as well	Comment noted. The list in appendix 1 was quoted directly from PPS12 but will expand.	Since the list may change over time, Appendix 1 has been retained as a broad indicative, but a fuller list is prepared as a submission document.
53	Pamela Park, Deputy Chief Executive, Voluntary Action Westminster (by email)	In your useful table, I think that the Westminster Community Network would sit neatly under the area forums. You could list the 13 member networks in the same way as you listed the 6 areas	Comment noted.	Agree to change text as suggested in para 51 and also in the schedule on page18.
	Metropolitan Police Authority (c/o CGMS Consulting) (by written letter)	General interest in being involved in the LDF process and in all LDDs. Wish to be consulted on any major planning applications in excess of: a) 200 residential units; b) 10000m2 of floorspace; or c) 200 car parking spaces	Comment noted. Criteria will be incorporated in officers' internal guidance notes	No change to text.
Appendix A and Chapter 3	Metropolitan Police Authority (c/o CGMS Consulting) (by written letter)	Welcome the recognition within the draft SCI that emergency services have a capacity to get involved in planning matters (paragraph 12) but would like to be listed amongst the consultation groups in Appendix A. Likewise in Chapter 3.	Comment noted.	Add to list of groups (In Chapter 3, Met Police are already listed in para 62 B b))
	Metropolitan Police Authority (c/o CGMS Consulting) (by written letter)	The Council's existing consultation arrangements with the local police, for example through their involvement in the LSP, and with the Local Crime Prevention Officers, should be continued.	Comment noted. They are listed in Chapter 3	Expand to include emergency services.
	Highways Agency (by written letter)	General letter stating their interest in Westminster's LDF and to be consulted in future.	Noted. Details added/edited in database	No change to text.
	National Grid (c/o Malcolm Judd & Partners) (by written letter)	General letter stating their interest in Westminster's LDF and to be consulted in future.	Noted. Correspondence to be sent to National Grid (see database) rather than agents.	No change to text.
	Covent Garden Area Trust (twice) (by written letter)	General letter stating their interest in Westminster's LDF and to be consulted in future.	Noted. Details added/edited in database	No change to text.
	Fairview Homes (c/o RPS Planning) (by written letter)	General letter stating their interest in Westminster's LDF and to be consulted in future.	Noted. Details added/edited in database	No change to text.

	The Countryside Agency – Landscape Access Recreation (by written letter)	General letter on the organisation’s role and work, and value in any consultations.	Noted. Details added/edited in database	No change to text.
	National Offender Management Service (NOMS), which incorporates HM Prison Service (c/o Lambert Smith Hampson) (by written letter)	General letter stating their interest in Westminster’s LDF and to be consulted in future. Would like us to consider the inclusion of a criteria based policy to deal with a firm prison proposal should it arise in the plan period. Would be happy to propose a detailed policy for inclusion in a DPD.	Noted. Details added/edited in database. Comment on prison proposal noted for future policy development	No change to text.
	London Ambulance Service (c/o Malcolm Judd & Partners) (by written letter)	Request that the strategic needs of the LAS as an emergency service should be more explicitly addressed in future Council planning policy. The expressed needs of LAS station provision within the borough are considered worthy of inclusion within future planning policies as despite their lack of class D1 designation, they remain an important community facility. Want to be added to the list of recognised consultees as part of the LDF process. Need to be consulted on developments that will significantly increase the resident or working populations of the City.	Noted. Details added/edited in database. Will include LAS in community involvement exercises. For planning applications, criteria will be incorporated in officers’ internal guidance notes - suggest use criteria offered by Police for consultation on devpts.	No change to text.
	Imperial College (c/o Gerald Eve) (by written letter)	General letter stating their interest in Westminster’s LDF and to be consulted in future.	Noted. Details added/edited in database	No change to text.
	The Marylebone Association (by written letter)	General letter stating their interest in Westminster’s LDF and to be consulted in future.	Noted. Details added/edited in database	No change to text.
	NHS London Healthy Urban Development Unit (through the PCT) (by written letter)	General letter stating their interest in Westminster’s LDF and to be consulted in future.	Noted. Details added/edited in database	No change to text.
	WM Morrison Supermarkets Plc. (c/o Rapleys) (by written letter)	General letter stating their interest in Westminster’s LDF and to be consulted in future.	Noted. Details added/edited in database	No change to text.
	Disability Rights Commission (by written letter)	General letter stating that they do not have the resources to respond to consultations unless they concern matters which are directly related to the work of the DRC.	Kept on database	No change to text.
	The Theatres Trust (by email)	General letter stating their interest in Westminster’s LDF and to be consulted in future.	Noted. Details added/edited in database	No change to text.

	Union Railways (North) Limited (by written letter)	General letter stating they do not have interest in the borough	Noted. Details removed from database	No change to text.
	Jones Lang Lasalle (by written letter)	General letter stating their interest in Westminster's LDF and to be consulted in future.	Noted. Details added/edited in database	No change to text.
	The Chartered Institution of Wastes Management (by email)	This group has no resources to respond properly this time but want to remain on the consultation list.	Noted.	No change to text.
	British Waterways London (by written letter and response form)	General letter stating their interest in Westminster's LDF and to be consulted in future. Further information on the organisation's role and work, and value in any consultations.	Noted. Details added/edited in database	No change to text.
	British Waterways London (by written letter and response form)	Q9. Best methods to ensure that the public are involved in future decisions about planning: Make them aware of the impact of policy making on individual planning applications which may affect their property.	Comment noted.	No change to text.
	British Waterways London (by written letter and response form)	Interested in being consulted in strategic / planning policy issues as well as planning applications	Comment noted.	No change to text.
	British Waterways London (by written letter and response form)	British Waterways also encourages pre-application discussions on proposals which would fall within this designation, and we request that this too is reflected in the SCI under Chapter 3 section A.	Noted – cannot list all bodies that may wish pre-application discussions, although comment appreciated. British Waterways is in Appendix 1.	No change to text.
	Thames Water (by written letter)	Thames Water would like to be directly referred to in a list of Specific Consultation Bodies in Appendix 1	Noted	Added Thames Water to Appendix 1 'Specific Consultation Bodies' and thus removed from 'Other consultees'
	Thames Water (by written letter)	Realistic consultation periods with water and sewerage undertakers will need to be taken account of in the preparation of the LDDs – as adequate water and sewerage infrastructure provision in an essential pre-requisite for development	Noted. Agree this is an important issue. Consultation period will be as realistic as possible.	No change to text.
Chapter 3	Thames Water (by written letter)	Thames Water would expect to be consulted on most major planning applications	Noted. Criteria already apply for consultations	Added Thames Water to section 58 B b) 4 (page 27)
12	Thames Water (by written letter)	Could the paragraph also refer to water and sewerage providers	Noted	Added "water, sewerage providers" to paragraph 12.
	Environment Agency (by written letter)	Pleased to be consulted and involved throughout the process of developing LDF documents and when considering planning applications. They have produced guidance on how to be consulted, and how the EA are involved in SEA and SA.	Noted. Will consult the Environment Agency on majority of issues.	No change to text.
58 A.(a)	Environment Agency (by written letter)	We encourage early consultation with ourselves on planning briefs relevant to our interests	Noted and do so.	No change to text.

60-62	Environment Agency (by written letter)	We also encourage involvement of the EA in pre-application discussions, where relevant to our interests	Noted and do so.	No change to text.
43	Home Builders Federation (by written letter)	The SCI fails to address how important LDF topics will be addressed and although it recognises the role of stakeholders in the production of DPD policies on page 13 where it states “the city council will seek involvement of relevant groups and organisations in the development of this information base where appropriate”, it fails to state how these stakeholders will be involved and how they can get involved. House builders have considerable expertise and knowledge which should be harnessed for the evidence base to support policies.	Comments noted. It is too early to state how different policy topics will be dealt with through the LDF process. The ways in which stakeholders will be consulted are outlined in the SCI. Actual consultation will be tailored to the circumstances of issues under review.	The diagram on pp. 20-21 shows how groups will be involved
Appendix 1	Home Builders Federation (by written letter)	We believe that Appendix 1 should be extended beyond the list in PPS12, to include local consultees including developers/house builders active in the borough, to ensure policies are developed comprehensively and effectively in a collaborative approach.	Noted. Agreed.	Add Home Builders’ Federation to Appendix 1.
21 and 22	The Westminster Society (by written letter)	To a fair extent, this aim and the methods for implementing it are already in place in Westminster	Noted. Supportive comment welcomed and agreed with.	No change to text.
Figure 1, page 12	The Westminster Society (by written letter)	There is a danger that the very complexity of the interrelated mechanisms could serve to deter people from participating in the process. Clearer presentation would perhaps be helpful; the charts on pages 20-21 present matters in a slightly clearer style	Noted. Agreed that processes are very complex.	These diagrams are generally found to be the best way to depict a very complicated set of procedures. Small changes made to text to improve clarity.
44-46	The Westminster Society (by written letter)	There has been a temptation to make SPDs too prescriptive and in effect to get them to act as extensions to the main planning guidance rather than serving to explain the main guidance.	Noted. This is a comment about the formulation of SPG/SPD	No change to text.
47-53 (and supporting table)	The Westminster Society (by written letter)	I was a little surprised to see, among the list of groups in paragraph 52, the WASF. For WASF to act as an umbrella group for our member societies and associations could represent a notable extension in the way that WASF operates. I am sure we could rise to the task but I would welcome a steer from you as to how you would envisage what was involved.	Comment noted. Considered that WASF does and should continue to act as umbrella group. Would welcome discussions with WASF about how this role can be supported.	No change to text.
Page 19, third box	The Westminster Society (by written letter)	The inclusion in the table of involving the newsletters of the recognised amenity societies looks interesting but again, I would welcome a little more background on what you have in mind.	Noted. Already placing articles in SEBRA and other society newsletters to good effect. Again, would welcome discussion.	No change to text.
55-56	The Westminster Society (by written letter)	Feedback is all very well, but it might be advantageous to explain sometimes why views of consultees have not been taken on board in detail; item (b) in paragraph 56 should perhaps be given increased emphasis if only to encourage people to remain part of the process	Noted.	Look again at para 56 and expand section on feedback.

Pages 24-28	The Westminster Society (by written letter)	The list of application types is a bit selective and it might be worth a short appendix setting out all the categories of application as well as the "usual suspects"	Noted. SCIs are only required to cover applications for planning permission. We have already expanded this to cover the majority of other applns. Not intended to be comprehensive since this would make the section over-complicated	No change to text.
Page 31	The Westminster Society (by written letter)	I see that amenity societies are listed in Appendix 1 as falling within 'Local Agenda 21'. Is there any document that describes LA21 and the role of the amenity/civic society sector within it? If so, I would be delighted to see a copy.	Local Agenda 21 originated in the 1990s and ethos now widespread. Government guidance is that sustainable development, and the kinds of processes that used to be carried out by some local authorities through Local Agenda 21, should now be part of 'sustainable community strategies'. The Westminster Local Agenda 21 Strategy 'A Strategy for Environmental Sustainability', published in 1999, was overtaken by events, with the coming of community strategies. However, many of the policy aims and proposed actions within that strategy have been pursued through a range of other channels.	No change to text.

	Transport for London (by written letter and response form)	General letter on the organisation's role and work (together with an enclosed guidance note which outlines TfLs role in the land use planning process). Generally supportive of the Draft SCI document.	Supportive comment welcomed.	No change to text.
	Transport for London (by written letter and response form)	Contact lists need to be updated so that relevant people / organisations are contacted	Noted. Contact details updated on database.	No change to text.
	Paula Sousa, PIP SW1 (by email)	The Draft SCI is too hard for people with learning disabilities to understand, 'valuing people' gives advice about how to draft forms so we can make sense of them. Can someone come in and explain this to us in a way we can understand.	Arrange meeting	Produce a guide to SCI post-adoption
	Government Office for London (by written letter and by email)	I note that this version of the SCI has been redrafted and now reads well and addresses the nine SCI tests of soundness set out in para 3.10 of PPS12.	Comments noted and welcomed	No change to text.
34	Government Office for London (by written letter and by email)	General – Refer to "First Secretary of State" at first reference in SCI and then "Secretary of State" thereafter	Noted. Agree.	Changed in paragraph 34.
16	Government Office for London (by written letter and by email)	Second sentence relating to the application of generic LDF policies only refers to planning applications. No reference is made to other types of applications e.g. Listed building and conservation area consents until para 62 on page 27. Given the nature of the Borough and the importance of these issues / volume of applications it might be helpful to the reader to include explicit reference to them earlier in the document.	Noted.	Change para 16 as suggested by GoL.
18	Government Office for London (by written letter and by email)	Does not give much detail about Sustainability Appraisals. Again to help the reader it might be helpful to have a cross reference to the 4th bullet point of para 38. Given that SAs are required for SPDs, suggest second sentence refers to Local Development Document rather than DPD	Noted.	Change text as suggested.
25	Government Office for London (by written letter and by email)	Refers to responses made during different LDF consultation stages and how these will be considered. It might help the reader if you were to explain different stages e.g. Regulation 25. Alternatively you could move para 34 dealing with process of producing SCI up to the What happens next section at front of SCI. Also, the last sentence of para 25 says that reports will be published in paper form but it does not say where these will be made available	Noted.	Move para 34. up to "what happens next". Explain that paper copies will be available from One Stop Shop and libraries.
26	Government Office for London (by written letter and by email)	Penultimate sentence - add "or" after "inspector" and explain that where an oral hearing is necessary it is expected that the examination process takes the form of a round table discussion.	Noted. Agree.	Change text as suggested in para 26
31	Government Office for London (by written letter and by email)	Re the last sentence it would be helpful to add that that it may also be necessary for the Council to review the LDS at other times too so as not to convey too rigid an impression of review triggers for the LDS which should of course be kept up to date	Noted. Agree.	Change sentence in last part of paragraph 31 as suggested.
38	Government Office for London (by written letter and by email)	3rd bullet point. The AMR might also highlight areas that require policy formulation or where policies are no longer necessary / used.	Noted. Agree.	Change para 38 third bullet to reflect GoL comment

Figure 1 (page 12)	Government Office for London (by written letter and by email)	Add "3" after "none programmed in first".	Noted	Changed in Figure 1.
43	Government Office for London (by written letter and by email)	Section 6 on page 14. The reference to a hearing at the end of the paragraph could be slightly confusing as the SCI has not made reference to hearings before this point	Noted. Agree.	Mention 'hearings' earlier in text and add to glossary
43	Government Office for London (by written letter and by email)	Section 7. Suggest revising last sentence as the 6 week legal challenge period follows adoption of a DPD. (Section 113 sub paras (4) and (11) of 2004 Act refers)	Noted. Agree.	Change as suggested.
52	Government Office for London (by written letter and by email)	Particularly given the number of offices and office workers within Westminster might employers / employees be considered worth adding in the list of hard to reach groups?	Noted. Agree.	In para 52 add officer workers to description of 'hard to reach' groups.
Pages 20-21	Government Office for London (by written letter and by email)	Under the 'How we will involve you' boxes – are you really able / prepared to send DPDs (preferred options stage) and SPDs (consultation stages) to all consultees on your planning database? Unless you can send the bulk electronically this could entail considerable costs in getting hard copies printed and despatched. That said an interpretation of the 2004 Regulations requires that in respect of DPDs you do so once a consultee has been identified at Regulation 25 stage. This would seem to indicate the need to be clear at the outset that your Council will consult with bodies only if the matter of the LDD affects them and with additional bodies as requested / deemed appropriate to do so	Noted. Agree.	Clarify the diagrams to make it clear that only relevant bodies will be consulted on DPDs
Appendix 1	Government Office for London (by written letter and by email)	Under b), again for ease of reference to the reader it would be helpful to list here the neighbouring boroughs	Noted. Agree.	Changed Appendix 1 'Specific Consultation bodies' (b) to include a list of all adjoining boroughs
Glossary (page 34)	Government Office for London (by written letter and by email)	Under definition of LDS same point as that raised above in respect of para 31	Noted.	As before.
	Tom Ball / London Forum of Amenity and Civic Societies (by written letter and response form)	Overall a good document, especially paragraphs 16, 17, 22, 24, 25 and 34	Noted. Supportive comment welcomed.	No change to text.
13	Tom Ball / London Forum of Amenity and Civic Societies (by written letter and response form)	Need fewer initials and fuller names in certain parts of the document. Paragraph 13 add understand the Local Development Framework before LDF"	Noted	Changed paragraph 13 to "Local Development Framework (LDF)"
16	Tom Ball / London Forum of Amenity and Civic Societies (by written letter and response form)	Paragraph 16 first line add LDF	Noted	Changed paragraph 16 to include the initials "LDF".

Figure 1	Tom Ball / London Forum of Amenity and Civic Societies (by written letter and response form)	Is still not 'good' and rather less clear than the first draft. Needs another go! It is unclear just what the arrow heads are pointing to – sequence, content, space?	Noted.	Figure 1 redone.
Page 20	Tom Ball / London Forum of Amenity and Civic Societies (by written letter and response form)	Could this be referred to as Figure 2?	Noted. Agree.	Label given to Figure 2.
Page 21	Tom Ball / London Forum of Amenity and Civic Societies (by written letter and response form)	Could this be referred to as Figure 3?	Noted. Agree.	Label given to Figure 3.
Glossary	Tom Ball / London Forum of Amenity and Civic Societies (by written letter and response form)	Add to glossary RUDP	Noted.	RUDP not actually mentioned anywhere in SCI so do not think it helpful or necessary to add to glossary.
	Tom Ball / London Forum of Amenity and Civic Societies (by written letter and response form)	Despite a relatively standard format for producing planning productions, which present themselves as professional and business like, many tend to be institutional and dry. Perhaps WCC could follow other boroughs in producing a rather more user friendly document. Perhaps Cllr Robert Davis or Cllr Angela Hooper could give thought to this aspect?	Noted.	Will consider publishing a shorter, easier to read guide after adoption.
	Tom Ball / London Forum of Amenity and Civic Societies (by written letter and response form)	Q9. Best methods to ensure that the public are involved in future decisions about planning: Public presentations and seminars. Given the relative complexity I think the issue is best approached by personal invitation with follow up in the Area Forums.	Noted. Looking at ways of using Area Forums as an effective way of communicating a planning policy (LDF) matter.	No change to text.
Chapter 3	Hyde Park Estate Association (HPEA) (by written letter and response form)	Pre-application consultation: We would welcome and actively participate in pre-application briefings, the most recent relating to the triangle site adjoining Paddington Station. HPEA can call on expertise and produce constructive comment, criticism and alternative suggestions that are found most useful by developers.	Noted with interest. Involvement welcomed	No change to text.
58 A(b)	Hyde Park Estate Association (HPEA) (by written letter and response form)	Support such measures, and have been involved in the past by sitting on the consultees and boards that led to the Paddington BID	Noted. Support appreciated.	No change to text.
58 A(c)	Hyde Park Estate Association (HPEA) (by written letter and response form)	We are concerned at the recent changes that involve more expense for pre-consultations. We are experiencing adverse reaction from local small business owners who find this a more onerous expense than before. We urge the council to reconsider this as pre-consultation by businesses, developers, etc. can save so much time and cost in the development / alteration process.	Noted. Charges cover internal costs only. To date, applied to major applns only, so would not affect small businesses.	No change to text.
	Hyde Park Estate Association (HPEA) (by written letter and response form)	Community Involvement: We frequently involve residents living nearby when applications for planning consent are made. This is a two-way process and works well. Anything the council can do to raise interest from local people is welcomed.	Noted.	No change to text.

58 B	Hyde Park Estate Association (HPEA) (by written letter and response form)	We will continue to be actively concerned on these issues.	Noted. Support welcomed.	No change to text.
	Hyde Park Estate Association (HPEA) (by written letter and response form)	General strengths of Draft SCI: Westminster is already a leading authority when it comes to public consultation. We are wide ranging in who we consult. We do not think WCC needs to expand greatly its excellent existing services.	Concerns noted. Costs will inevitably rise.	No change to text.
	Hyde Park Estate Association (HPEA) (by written letter and response form)	General weaknesses of Draft SCI: We are concerned that widening the consultation process as suggested in Appendix 1 may make the process unwieldy and more expensive.	Concerns noted. Costs will inevitably rise.	No change to text.
	Hyde Park Estate Association (HPEA) (by written letter and response form)	Local Development Framework: We are aware of and to a large extent share concern over the new system introduced by the government. It changes the procedures and penalises effective Local Authorities such as Westminster and will potentially create future problems. We are concerned about the piecemeal method of producing policies and plans but this is outside your control. We will do everything we can to support the council implement a successful city plan and make it workable at ground level.	Concerns about the new LDF system noted. Supportive statements appreciated.	No change to text.
21	St James (Grosvenor Dock) Ltd – (c/o Barton Willmore) (by written letter and email)	Objection: This paragraph should state: “To ensure the active, meaningful and continued involvement of local communities, stakeholders, <u>landowners, developers and</u> statutory consultees throughout the process of developing our Local Development Framework and when considering planning applications.” Reason: We consider that additional interested parties should be added to the Council’s Community Involvement Aim to specifically include landowners and developers with significant long-term land interests within the City of Westminster.	Noted. “Stakeholders” embraces landowners and developers, so see no reason to single them out in the broad aim.	No change to text.
23 and Appendix 1	St James (Grosvenor Dock) Ltd – (c/o Barton Willmore) (by written letter and email)	Objection: Should be amended to specifically include landowners and developers with significant long-term land interests within Westminster. Reason: same as above	Noted. Agree to expand Appendix 1.	Widen Appendix 1 to include landowners and developers.
32-33	St James (Grosvenor Dock) Ltd – (c/o Barton Willmore) (by written letter and email)	We request that St James is made aware of any future consultation exercises with regards to the Council’s LDF. St James are a major developer currently operating in the City of Westminster and were not made aware of any discussions, workshops or surveys carried out by the City of Westminster for involving groups and consulting on its SCI as stated in paragraph 32.	Noted. Details added to database. Sorry this organisation was not aware of the survey in August / September 2005.	No change to text.

58 A (a) Planning Briefs	St James (Grosvenor Dock) Ltd – (c/o Barton Willmore) (by written letter and email)	<p>Objection: The Council should provide further detailed information on the timescale involved in preparing any necessary planning briefs for large or complex sites. In addition, it should be recognised that if an applicant is willing to carry out the appropriate level of pre-application public consultation then a planning brief may not be necessary.</p> <p>Reason: The preparation, consultation and adoption of a planning brief for a development site could take significant time and cause serious delay, additional expenditure and risk for applicants. The Council should therefore be more explicit with regards to the likely timescale involved in preparing any necessary planning briefs, particularly in relation to the submission of a planning application. In addition, if an applicant is prepared to carry out an appropriate level of public consultation, as agreed with the local authority, then it should not be necessary for a planning brief to be prepared. This would help to speed up the development process while also fully engaging with the local community.</p>	<p>Noted. It is rarely known at the outset how long it will take to prepare a planning brief. Time taken to prepare a planning brief will depend on complexity of issues, but council will take into account information from landowners about intended timescales. Pre-application discussions serve a different purpose from planning briefs, the latter of which highlight community issues and any local deficiencies. Consultations will normally be for 12 weeks. Consultations by a developer will not negate the need for a carefully considered planning brief.</p>	No change to text.
59	St James (Grosvenor Dock) Ltd – (c/o Barton Willmore) (by written letter and email)	<p>Objection: Add to the end of this paragraph: “A local authority cannot refuse to accept a valid application because it disagrees with the way in which a developer has consulted the community.”</p> <p>Reason: The Government’s document ‘Community Involvement in Planning: the Government’s Objectives (February 2004)’ states in Paragraph 3.18: “A local authority could not refuse to accept a valid application because it disagrees with the way in which a developer has consulted the community...” Paragraph 59 of the Council’s SoCI should be amended accordingly.</p>	Agreed.	Add to text or para 59.
62 B (b)	St James (Grosvenor Dock) Ltd – (c/o Barton Willmore) (by written letter and email)	<p>Other Community Involvement section. Objection: This section should also state that during the planning application process the local authority will provide feedback to applicants on any responses received as part of the consultation process as soon as practically possible.</p> <p>Reason: The Government’s document ‘Community Involvement in Planning: the Government’s Objectives (February 2004)’ states in Paragraph 3.18: “There is a tension between the need to meet best value targets for handling major planning applications, while allowing for community involvement”. We consider that it is important that LAs commit to providing applicants with feedback, including copies of responses, on the consultation process during a planning application as soon as possible. This will allow applicants to deal with any issues raised as quickly as possible and assist the LA in meeting its best value targets.</p>	Noted. Accept.	Revise text as suggested.

Foreword	Covent Garden Community Association (by written letter and response form)	We are concerned that the scope of the consultation appears to be limited to all planning applications and emerging policies. Our residents are particularly concerned with licensing matters as these seem to impinge on peoples' lives and lead to more disturbances than any other matter. Therefore, we would particularly ask for consultation on all licensing matters and also highway changes to be included in the consultation.	Licensing and highways operate under different legislative regimes so it would be confusing to include them in this document.	No change to text
13	Covent Garden Community Association (by written letter and response form)	The CGCA is in a strong position to advise residents on matters outlined in the LDF. With our direct contact and communication with diverse local members we are able to contact many members who would not normally be approached. Again the CGCA would be able to represent them over such approaches.	Noted. CGCA is valued as a crucial body for representing local opinion.	No change to text
14	Covent Garden Community Association (by written letter and response form)	The CGCA is not in a strong position to represent commuters.	Noted. Other means will have to be found to consult commuters.	No change to text
15	Covent Garden Community Association (by written letter and response form)	The CGCA is well positioned to channel opinions to the local authority as its membership includes architects, property barristers, lawyers as well as local business people. However, bear in mind that a large proportion of membership do not enjoy access to electronic methods of communication. It is therefore important to funnel info. through organisations such as CGCA.	Noted. Comment useful.	No change to text
17 (but more general)	Covent Garden Community Association (by written letter and response form)	Future consultations should consider holidays such as Christmas and New Year when it comes to the 6 week consultation period.	Noted and in future agree to do this.	No change to text
49	Covent Garden Community Association (by written letter and response form)	Covent Garden is not entirely in Westminster; 40% is in Camden. This dichotomy leads to inherent problems over policing, licensing, waste collection, highway consideration and principally consultation. The problem is not helped by the two adjoining councils being of different political persuasion. Consideration should be given at an early stage as to how best to set up an acceptable level of cooperation and consultation, which is not present at the moment.	Note. This issue is outside scope of SCI but co-operation with Camden will help in future.	No change to text
51	Covent Garden Community Association (by written letter and response form)	Advance warning of forthcoming consultations is to be welcomed. However, it often proves difficult to obtain a written response within six weeks. Being a voluntary organisation, the main committee usually meets every month and together with holidays this often proves a six week reply impossible. In the case of the LDF a number of different people and committees need to become involved.	Noted. Consultations on documents in the LDF will always be for at least 12 weeks. Timescales may be shorter for SPDs	No change to text
52	Covent Garden Community Association (by written letter and response form)	Please add CGCA to the list	This is not intended to be a complete list, so cannot specify individual amenity groups here.	No change to text
57	Covent Garden Community Association (by written letter and response form)	The current system for planning applications/listed building applications works quite well.	Comment appreciated.	No change to text

62 B a)	Covent Garden Community Association (by written letter and response form)	Adverts should be strictly limited to local newspapers i.e. that circulate in the Covent Garden area. Examples recently have shown ads limited to the Ham and High, which does not circulate in the area, and is many miles away.	Comment noted. The newspaper group places our adverts in several titles, but we will ask them to ensure this includes coverage in Covent Garden.	No change to text
62 B a)	Covent Garden Community Association (by written letter and response form)	Site notices in busy areas can cause problems. Often notices are fixed to lamp posts which are not close to. A sign board like small estate agents board might be more appropriate.	Lamp posts may not be ideal, but supplement other forms of notification. It is not practicable for us to place notices on private property.	No change to text
62 B a)	Covent Garden Community Association (by written letter and response form)	Adjoining owners who are circulated seems to be arbitrary. The planning authority should lay down regulations stating what is understood by adjoining property. In particular, premises across the road are often ignored, when their opinion is important.	Will review internal guidance on consultations. However, hard and fast rules are not appropriate, as it is always a matter of judgement as to which properties would genuinely be affected.	No change to text
62 B b) 6 (g)	Covent Garden Community Association (by written letter and response form)	Some blocks of flats do not have a formal tenants or residents association. Where this is the case, the only contact is with individual tenants. In Covent Garden, the CGCA has contact with someone in virtually every block and so the association is a good conduit for contact.	Noted with appreciation.	No change to text
62 B d) i	Covent Garden Community Association (by written letter and response form)	Appears to exclude grade II listed buildings. As the majority of listed buildings are Grade II the omission is extremely serious. In Covent Garden, grade II buildings add enormously to the ambience of the area.	The SCI text is an accurate statement of law relating to proposals for internal works to Grade II listed buildings.	No change to text
62 B d) i	Covent Garden Community Association (by written letter and response form)	Where demolition is involved, particularly where the demolition is large scale, the association has always considered it should require a planning application.	Noted. However, when application is or is not required is a matter of law..	No change to text of SCI.
	Covent Garden Community Association (by written letter and response form)	Q9. Best methods to ensure that the public are involved in future decisions about planning: It should be borne in mind that the majority of the public do NOT have access to the web or computers	Noted. Other groups have made similar comments and will ensure that postal consultation continues.	No change to text required.
	Caxton Youth Organisation (by response form)	Q9. Best methods to ensure that the public are involved in future decisions about planning: Clarity, proper face to face consultation, transparency, lack of jargon on info	Noted. Will endeavour to follow this advice.	Consider producing a summary guide to SCI after adoption

	Lucy Head (by response form)	Q8. Strengths and weaknesses of the Draft SCI and improvements: The language could be a lot clearer. It is unclear in places whether this is a consultation on the planning process, or a consultation on the consultation. Where is the summary? I'm not sure I received a copy of the summary with the draft SCI.	Sorry you did not see the summary. Lack of clarity noted.	Consider producing a summary guide to the process post adoption.
	Lucy Head (by response form)	Q9. Best methods to ensure that the public are involved in future decisions about planning: Need longer consultation periods. I only received this document late - hence my late response. More local newsletters / meetings?	Noted. Will ensure that consultations last at least 12 weeks and accept late responses	No change to text
	David Barrett (by response form)	Q8. Strengths and weaknesses of the Draft SCI and improvements: What is the term 'plan making' - not even sure. What is the summary - is this it?! There is no distinction between the information useful to the community (p.15-28) and the legal explanations, most of which is at the front and puts off the lay reader. The experience is like wading through a legal document (albeit without much jargon) most of which is of relevance to council worker rather than the local community.	Noted. Accept that new development plan system contains jargon that means very little to the public.	Consider producing summary guide post adoption.
	David Barrett (by response form)	Q9. Best methods to ensure that the public are involved in future decisions about planning: Articles in the local press - e.g. was this document promoted?	Noted. We did promote this in Westminster Reporter and some local amenity society newsletters.	No change to text.
	English Heritage (by written letter)	General letter stating their interest in Westminster's LDF and to be consulted in future. Also includes summaries of a number of publications they have prepared in relation to the built environment. Lists other useful agencies in the field of heritage. Advise us to use our conservation staff as closely as possible.	Noted for future reference.	No change to text.
	Neil Hall, Head of West End Team (by note)	General comment that document will be difficult to understand by people who are not in planning profession. Detailed comments on text .	Noted. Will consider publishing an easy-to read guide to community involvement once SCI is adopted.	Some textual changes incorporated






Draft Statement of Community Involvement (SCI)

Consultation response form

The Draft Statement of Community Involvement sets out how Westminster City Council will involve the public in preparing the Local Development Framework (LDF) and evaluating planning applications. In order to maximise the opportunities and benefits of community involvement in planning, the Council is keen to hear your views on the enclosed Draft SCI. Please complete the sections below and return this form to us following the instructions given at the end.

Part A: Your views on the Draft Statement of Community Involvement

Please tick one box only from the five possible options, stating how far you agree with the following statements.

	Strongly agree 	Agree 	Neither agree or disagree 	Disagree 	Strongly disagree 
I am already fairly well informed about planning					
It is easy to understand the Draft SCI document.					
It clearly explains how to become involved in plan making.					
I am satisfied with the methods of public involvement that will be used.					

The draft SCI clearly explains where to find out about involvement in planning applications.					
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Please tick the most appropriate box.

	Yes	No
Would you like to be involved in plan making?		
Are you interested in attending a discussion event about planning issues in Westminster?		

What do you feel are the strengths and weaknesses of the Draft SCI, and what improvements could be made?

What do you think are the best ways/methods to ensure that the public are involved in future decision making about planning?

Part B: Your contact details

Title

First Name / Initials

Surname

Are you an:

Individual or Representing an organisation / Group

Name of group.....

Address

.....

.....

Postcode

Telephone

Fax

Email

Website

Thank you for taking time to complete this questionnaire. Please return it by:

Friday 2nd December 2005

- **By post to:** Gillian Dawson, City Planning Group, Westminster City Council, City Hall, 64 Victoria Street, SW1E 6QP
- **By hand to:** One Stop Planning Desk, City Hall, 62 Victoria Street, SW1E 6QP
(FAO Gillian Dawson, City Planning Group)
- **By fax to:** Gillian Dawson, City Planning Group, 020 7641 3050