

Ms Kimberley West
Head of City Planning Policy
Innovation and Change
Westminster City Council
17th Floor
64 Victoria Street
London
SW1E 6QP

By email only: planningpolicy@westminster.gov.uk

13 March 2023

Dear Kimberley,

Re: Draft Statement of Community Involvement

I am writing on behalf of the Westminster Property Association (the “Association”), the membership body and advocacy group for the leading owners, investors, professional advisors and developers of real estate in the City of Westminster. A list of the 240+ member companies we represent is available [here](#).

The Association welcomes the opportunity to comment on Westminster City Council’s draft Statement of Community Involvement (‘SCI’).

The Association has previously supported the City Council’s Early Engagement Guidance, upon which the SCI builds.

The Association considers that early and effective engagement with relevant stakeholders prior to the submission of any planning application is key to positive, sustainable development. The Association therefore very much supports the City Council’s work on revising the SCI to encourage meaningful community engagement, with a stronger focus on digital engagement.

Notwithstanding this overarching support, there are two points which we consider should be re-considered. These are as follows:

Community Engagement with the Council

On p18 of the draft SCI, it states:

“Local communities are encouraged to communicate their comments on emerging development proposals to the council following pre-application engagement by applicants and developers. Comments can be provided by email using the contact email addresses for the planning area teams provided in Appendix 1. By sharing your comments on emerging development proposals directly with the council, it enables the views of the local community to be addressed in pre-

application discussions the council undertakes with applicants and developers, where these are valid planning considerations.”

We suggest that this is amended so that direct engagement between the applicant / developer and local communities and stakeholders is encouraged. Direct engagement is crucial for effective community engagement.

Encouraging communities to provide feedback to the City Council rather than developers could reduce the amount of feedback given directly to developers and would funnel this feedback through a pre-application process which may dilute/confuse the feedback. It would require additional City Council resourcing and potentially makes it more difficult for applicants to respond to comments raised. Close consultation, working and communication between stakeholders and developers, especially during the pre-application stage as proposals are designed, is important. This allows developers to gain an understanding of the range of community views – including those harder-to-reach and less engaged groups – and present the feedback received comprehensively in the application’s statement of community involvement. This in no way precludes communities and stakeholders sharing their views with the City Council as well both during pre-application and determination.

There may well be instances where there is a need for communities to engage directly with the Council rather than the developer. In the first instance, though, we suggest that developers and communities should be encouraged to engage together and the SCI should be clear that it supports close, direct engagement between developers, communities and other stakeholders, rather than requiring this to be managed through the City Council.

Applicant/Developer Pre-Application Discussions with the Council

On p19 of the draft SCI, it states:

“Following initial engagement with the community, we encourage applicants and developers to seek our views on development proposals before they submit an application.”

There will be some cases where engaging with the community first, before planning and other officers at the City Council, is appropriate and beneficial. The recognition that this is acceptable is welcome.

Conversely, there will be many proposals whereby their nature and complexity mean they are driven by technical matters, on which it is appropriate to seek officer advice in advance of consultation. This could include, for example, heritage constraints, complex land use issues, highway matters or similar. Community consultation can be improved by holding such discussions in the light of feedback on what may be technically feasible and realistic on a site.

On larger or more complex sites, it will be appropriate to discuss and agree consultation and engagement arrangements with officers, and to seek their advice.

Developers and occupiers will also, frequently, be under obligations to respect commercial confidentiality, constraining earlier, wider, discussions. This can often be to ensure staff whose jobs could be affected by a proposed relocation are properly made aware of proposals in advance of wider publication, but this should not prevent some engagement with the City Council.

The SCI should therefore be amended to acknowledge and support instances where it is entirely appropriate for developers to engage in initial pre-application discussions with the City Council prior to engaging with the community. This route would not preclude effective community engagement occurring as soon as possible after these initial pre-application discussions.

Draft Statement of Community Involvement – Summary

We summarise the points made within this response as follows:

1. We support the overarching objective of the SCI to encourage meaningful community engagement, with a stronger focus on digital engagement.
2. Communities and developers should be encouraged to engage directly with one another, especially during pre-application stages, rather than via the City Council. This will result in a more effective, streamlined engagement process.
3. There should be an acknowledgement that in some instances it will not be appropriate for developers to engage in community consultation prior to initial pre-application discussions with the City Council. This approach would not preclude effective community engagement occurring after these initial discussions.

We would be happy to discuss any of the points raised in this letter further if that would be helpful.

Yours sincerely,



Charles Begley
Chief Executive
Westminster Property Association
E: Charles.Begley@cwpa.org.uk