

Statement of Community Involvement (SCI) Summer 2021 Public Consultation Responses - Summary

Individual or Organisation	Organisation name	Summary of response	LBH Officer Comments
Individual	n/a	Regarding paragraph 5.2.2 on the production of conservation area appraisals and management plans, the individual suggested consultation with residents associations be made an obligation.	Agree that the wording should be changed to state that community engagement will take place, rather than may take place. The extent of engagement however should be proportionate to what is being proposed and this will be made clear in the text.
Individual	n/a	<p>Regarding the planning application process outlined in paragraph 6.8.1, the individual suggested that all changes to the application should be communicated to anyone who has objected/commented, and not just those thought to be substantive, with a further period to make further objections/comments.</p> <p>The individual also suggested putting comments on the portal for all to see.</p>	While it is appreciated that communities would want an opportunity to comment on any and all changes to a proposed scheme, planning officers' must use their planning judgement to resconsult only if those changes that could have a potentially significant effect. The Council needs to be mindful of ensuring communities have an opportunity to be involved in the planning process, but also of not unnecessarily delaying the planning process. Planning officers would use their planning experience and knowledge to determine what amendments to a scheme require resconsultation.
Organisation	Ickenham Residents Association	Pleased that LBH has undertaken this update of the statement of community involvement. We are pleased to see the continuing focus on the involvement of community groups but are concerned that LBH have not set out any policies on how to specifically increase the range of community groups it engages with or to set out any policies on measuring the effectiveness of community engagement. Doing so would hopefully increase the range of views expressed on planning matters and give local people an opportunity to give feedback on the quality and quantity of engagement facilitated by LBH.	Your concerns are noted and it can be made clearer in the document how the Council intends to reach a wider range of people. On measuring the effectiveness of community engagement, this would be achieved through monitoring the number and range of responses received.

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Organisation Ickenham
Residents
Association

Further concerns about the lack of detail in the draft SCI on the tools and techniques that LBH expect to use to deliver community engagement.

While some details have been given (outlined in figure 3), the Council intends to use a range of methods and retain some flexibility on how it consults so that it can use the most appropriate methods for the type of document being consulted on. The Council is committed to maximising community engagement and intends to use a case-by-case approach to achieve this.

The SCI was purposely worded this way to allow the Council flexibility to try alternative approaches depending on the circumstances and the type and effect of documents being consulted on, however, figure 3 does outline the various methods the Council will use to engage with the community. It is understood however that some of the wording could be strengthened to show more clearly the Council's commitment to positively engaging with communities.

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Organisation	Ickenham Residents Association	para 2.6.3 states: “during the preparation phase the Council may undertake some informal consultation.” It would be helpful to know what is intended. A “may consult” policy do not provide the certainty that communities and other interested parties need.	Agree that the wording should be changed to state that community engagement will take place, rather than may take place. The SCI was purposely worded this way to allow the Council flexibility to try alternative approaches depending on the circumstances and the type and effect of documents being consulted on, however, figure 3 does outline the various methods the Council will use to engage with the community. It is understood however that some of the wording could be strengthened to show more clearly the Council’s commitment to positively engaging with communities.
Organisation	Ickenham Residents Association	Para 2.6.6 states: “At this stage we can supplement the written consultations with a number of meetings and workshops and with face to face opportunities to explore the issues in real depth.” Again , It would be helpful to know what is intended. LBH should set out what “will” be done, rather than what “can” be done.	While some details have been given (outlined in figure 3), the Council intends to use a range of methods and retain some flexibility on how it consults so that it can use the most appropriate methods for the type of document being consulted on. The Council is committed to maximising community engagement and intends to use a case-by-case approach to achieve this.

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Organisation	Ickenham Residents' Association	Para 2.6.9 states “This is the last opportunity for the Council to make significant changes to the content of the Local Plan”. Is this really the case? Surely LBH have the flexibility to make significant changes later in the process if this is needed?	The most significant issues with the Local Plan should be addressed at this stage as the next stage is focused on refining and finalising policies before submission to the Secretary of State for examination. While it is possible to make further changes later, paragraph 2.6.9 is highlighting the fact that it is more difficult to make significant changes later in the plan-making process and that the Council is focused on addressing all issues with the Local Plan as early as possible. This will be made clearer in the text.
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Organisation	Eastcote Residents' Association	<p>On page 27 it states ‘we encourage residents and businesses to check our weekly list of received applications here https://planning.hillingdon.gov.uk/OcellaWeb/planningSearch.</p> <p>Currently, there is a weekly list which is emailed to us each week, as local associations. If a widely available website version is envisaged, it would seem to be a good way for residents to learn about planning applications in their area - we would be in favour of it, unless GDPR/other issues prevent it.</p> <p>We must add, though, that at the moment the above link does not take you to such a weekly list but rather to the LBH general application search page. This does not help residents unless they know already what they want to search for, eg a specific address (see also website links below).</p>	It is agreed that the link does not generate a weekly list and the website text as it is confuses matters. There is an element of self service required to generate the weekly list, however, as you mentioned it is not helpful unless you know what you are looking for. The Council will look into amending the website text and also the SCI text to make it clearer.
Organisation	Eastcote Residents' Association	<p>Page 29 states, in the bottom bullet point, that ‘Comments received will be put on the website’ (personal details will be redacted). If these are for all to view during the consultation/assessment process, this would be a new offering. Again, it is one that we would see as a positive addition.</p> <p>Currently, such comments (with personal information redacted) only appear in the Case Officer’s final report. This process is detailed on Page 30, suggesting the one detailed on Page 29 is an addition, provided earlier, before determination.</p>	This is noted. Due to an oversight this was included despite not being possible at present due to GDPR and resourcing issues. The current practice will continue for the time being. The SCI will be amended to reflect this.

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<p>Organisation</p>	<p>Eastcote Residents' Association</p>	<p>We appreciate the work that the Council does to ensure real and meaningful consultation, that LBH goes beyond statutory requirements, where possible, and the various methods that might be used are stated in this SCI.</p> <p>However, the reality, particularly highlighted in these COVID times, is that residents cannot expect any specific communication(s) in all cases. The very different ways which are deemed as acceptable can mean that even immediate residents are not actually informed. If a posted/emailed notification is not used, a notice on a lamp post can be removed before it is seen and details on the LBH website are only useful if you know something has been posted and where to look for it.</p> <p>This brings us back to the weekly list above – it would go some way to ensuring residents are able to see an application near them, assuming the availability of this tool is widely advertised.</p>	<p>Your concerns are noted and the Council will look into how communications are handled from a practice point of view.</p>
<p>Organisation</p>	<p>Eastcote Residents' Association</p>	<p>The examples we give here are just that and not intended to be an exhaustive trawl though the document.</p> <ul style="list-style-type: none"> •We would suggest that there are places where references to additional sources of information would be helpful, taking you to the precise website pages. For example:- <ul style="list-style-type: none"> oLocal Plan and SDP documents on the LBH website oCIL, Pages 20/21 – the appropriate pages on the LBH website. oWebsite heading in Table 1, Page 26 – link to LBH planning search page? oMaterial Considerations, Page 32 – if these are examples, where can the full details on material considerations be found? •We note that website details in a couple of cases do not take you to the correct, relevant place:- <ul style="list-style-type: none"> oWeekly list as detailed above. oLondon Borough of Hillingdon- Planning committees, Page 30 – this takes you to the old North, South/Central, Major Applications website, not the new Minor/Major Applications Committees. 	<p>This is very helpful and the SCI will be amended to include some of the suggested links.</p>

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Organisation	Eastcote Residents' Association	<p>Licencing Applications</p> <p>We appreciate that currently this is treated separately from Planning Applications and thus is not part of this SCI.</p> <p>We are raising the issue because we feel that it should be integrated within the Planning process such that relevant conditions can be included in the approval of a relevant application. Also, we ask that Licencing applications should be sent out for consultation, at least to relevant community organisations, such as ours, if not to the wider general public.</p>	<p>We understand your thinking however Licensing and Planning are two statutorily different systems. This does however raise the point that communication between licencing and planning teams could be improved. Your point regarding the consultation on licencing applications will also be passed on to the Licencing team.</p>
Organisation	Eastcote Residents' Association	<p>Regarding pre-application advice from the Council, where such advice has been provided, we would support the Council including their pre-application advice report as part of the application documentation posted on the LBH website.</p>	<p>Noted, however pre-application services are offered confidentially and the reports cannot be made public.</p>
Individual	n/a	<p>Regarding para 1.3.2 The Council should commit to refining its database of those individuals, groups, businesses etc. in order to deliver the “everyone in the community to take up the opportunity to be actively involved ...” ambition. It has been suggested that the database does not have the comprehensiveness or operational abilities to support this ambition. There ought to be a place in the SCI clearly explaining where to go to register one’s interest in being actively involved in the opportunities afforded by the planning system, to provide the necessary level of information that will make both broad brush and targeted notifications/consultations possible as appropriate.</p>	<p>Noted. The Council can look into making it clearer how to sign up to the consultation database.</p>
Individual	n/a	<p>Re Planning Policy documents and relationships with national and London-wide policy & guidance, whilst I appreciate that ‘conform’ is a simple way of expressing this, you have later used “take account of” which seems to better embrace the official language of ‘general conformity’, ‘consistent with’ and ‘have regard to’.</p>	<p>Noted.</p>
Individual	n/a	<p>Regarding para 1.6.1 The conventional referencing of NPPG is to at least identify which PPG ‘Category’ – in this case ‘Plan-making’ (ID 61 etc). However, this PPG para does not yet cross reference to ‘Consultations and pre-decision matters’ Category para 047 Reference ID: 15-047-20210719.</p>	<p>Noted. The referencing of NPPG paragraphs will be made clearer.</p>
Individual	n/a	<p>Regarding para 1.7.3 There is an active ‘Planning Aid for London’ now – see https://planningaidforlondon.org.uk/</p>	<p>Noted. The link will be amended.</p>

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Individual	n/a	Regarding para 1.8.1, refer to para 7.1 on more accurate (regulatory) requirements to review SCIs every 5 years	Noted. Para 1.8.1 will be amended to reflect this.
Individual	n/a	Regarding para 1.8.2 Some good practice includes the Lake District Park Authority's Local Plan consultation's use of social media, GLA/LB Newham's Royal Docks community engagement programme and LB Brent's EqIA on changes to planning governance arrangements. Also, there was the pre-pandemic LB Croydon's Urban Room as best practice for youth engagement.	Noted.
Individual	n/a	<p>The following comments will also apply to the Development Management section and elsewhere.</p> <p>Events: From my experience across London, on-line activities seem to be well thought through, but it is those without internet access that is of more concern. So far, during Covid, experience has demonstrated that meetings which are assemblies of people who previously knew one another pre-Covid can work well on-line, although there is a learning process to using this appropriately.</p> <p>Indeed there are advantages to on-line participation, allowing those with personal circumstances or other commitments to join in. HEAR, the London voluntary and community sector's pan-equalities and human rights network, has contributed to comments on another consultation that I have sight of: that there is an advantage to keeping this option post-Covid as an adjunct to any public event to enable the less mobile to participate so long as it is done properly to avoid further exclusion. To this I would add that some webinar systems can offer subtitles and that the 'Chat' and 'Question' functions allow additional communication to those with 'quieter voices' when an on-line meeting is being dominated by those with 'loud voices'.</p> <p>But there are concerns that those who have not previously worked with other attendees or the Council may be reluctant to join in the discussion. Again, it is apparent that even those well acquainted with internet access may dislike using 'Zoom' or equivalent. Anecdotally, 'Zoom' may be better suited to younger persons or those with an office type history of employment which marginalises older persons or those with, say, manual type employment history.</p>	Noted

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Individual	n/a	Publicising consultations: The continuation of more traditional lines of communication, if safe to do so, is supported. Keeping open the use of multiple channels of communication whilst seemingly to be a 'scatter-gun' or over-kill approach does have the advantage of ensuring deeper coverage and reach and can have a cumulative or reinforcing effect on recipients.	Noted.
Individual	n/a	Those without internet access: As noted above this raises concerns – ones that are difficult to deal with under the prevailing circumstances. I have asked my colleagues in various community networks across London for examples of good practice that could be recommended, but none to date have been forwarded to me. No doubt we will be returning to this aspect of community involvement again as research and searches continue.	Noted. The Council has sought to make clear that it will use alternative approaches where appropriate and not limit itself to set procedures, other than those that are statutorily required.
		Given the scale and diversity of the potential targets for community involvement, together with other features of local life circumstances, including a variety of languages and cultures, effective outreaching in these pandemic times is proving difficult for all – authorities, developers and community networks. In a sense there is an added barrier to democratic engagement with as of yet insufficient solutions. We need to recognise these limitations, keep them under review and correct them if remedies emerge. That the Council states it has an 'openness' and willingness to entertain new approaches that address these issues would be welcomed as something to be explicitly expressed in the SCI.	
Individual	n/a	Regarding para 2.5.8. - This paragraph raises expectations regarding the Preparation stage not just Regulation 18 stage. It is correct to do so since the Neighbourhood Planning Act 2017 and The Neighbourhood Planning Act 2017 (Commencement No. 3) Regulations 2018 , by amending Section 18 of the Planning & Compulsory Act 2004, now requires the SCI to address the (now additional) Sections 13 & 15 of the P&CPA 2004. As I understand this, there is an expectation that the SCI should set out how the Council is engaging communities and stakeholders in the preliminary stage of plan-making. However, the following sub sections on Preparation and Preferred Options (Regulation 18) do not fulfil this to the degree necessary.	Noted. It is considered that the SCI as a whole meets this requirement.

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Individual	n/a	<p>2.6.3 Contrary to the above cited legislation, the Council is proposing only to “may undertake some informal consultation”, a much lesser degree of engagement than that proposed for the Regulation 18 stage. Opportunities for involvement at the early formative stage are stressed in current national policy & guidance, the new London Plan 2021 and in the White Paper on Planning Reform. As NPPF 2021 para 16 c) says: “plans should c) be shaped by early, proportionate and effective engagement between plan- makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees”. Fuller, deeper and wider opportunities for engagement should be set out for the Preparation stage as for the Regulation 18 stage.</p>	<p>This is noted. The SCI will be amended to make clearer what will be done rather than what may be done. It will also be made clearer that the methods used are those identified in figure 3.</p>
Individual	n/a	<p>It is not till 2.6.7 that this paragraph under the Regulation 18 stage first mentions the Integrated Impact Assessment (IIA). It is only here, at this stage, that the (draft) IIA is first revealed to the public. The IIA, by definition, includes Sustainability Appraisal (SA) and Strategic Environmental Assessments (SEA). The environmental report accompanying the draft plan has to address the requirements of the EU Directive 2001/42/EC. In critiquing the adequacy of engagement at the Preparation stage, it is relevant to observe that ODPM guidance ‘A Practical Guide to the Strategic Environmental Assessment Directive’ (Appendix 6, p69) on developing and assessing alternatives states: “Stakeholders may usefully be involved in the generation [my emphasis]and assessment of both strategic and more detailed alternatives through consultation. Demonstrating that there are choices to be made is an effective way of engaging stakeholders in the process.” Consequently, your sentence “the focus will be on identifying issues and options in relation to emerging evidence” at this first stage of plan-making, namely Preparation, would be most usefully the subject of public engagement of the degree proposed for Regulation 18 stage.</p>	<p>The SCI will be amended to make clearer that the IIA scoping report will be consulted on at an early stage and the IIA consulted on at later stages of plan-making too.</p>
Individual	n/a	<p>Turning now to the production of the SEA, close reading of still relevant Government Guidance and the EU Directive for assessments has generated my analysis that the required and recommended involvement of the public should occur at the early formative stages. (This is one of the basic requirements for a fair consultation endorsed by the Supreme Court). Public involvement is useful at Stage A, and ought to happen at Stages B and C. The ODPM guidance on p10 applying EU Directive Article 6.1 & 6.2 explains that the public shall be given an early and effective opportunity ... to express their opinion on the drafts... at both Stages B and D.</p>	<p>Noted. See above.</p>

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Individual	n/a	However, it is on Stage A, “Setting the context and objectives, establishing the baseline and deciding on the scope”, that I wish to draw your attention to. The ODPM guidance says: “Responsible Authorities need to consider what information they already have and what more they will need. They may already hold useful information, for example from environmental assessments of previous plans or programmes. It may be useful to consult the public at this stage to seek additional information and initial opinions” (p26) And Appendix 3 says: “Other consultees, including representative bodies and members of the public, who often have a wealth of knowledge and understanding of the strategy or plan area, e.g. local conservation groups”. All this I advance to support my argument that the Preparation stage of the SCI proposes engagement, preferably comparable to, or at least approaching the degree of, that proposed for Regulation 18.	Noted
Individual	n/a	3.1.1 Neighbourhood Plans are ‘made’ which you could better explain as ‘made (adopted)’. This also appears elsewhere as at para 3.3.1	Noted. SCI will be amended to reflect this.
Individual	n/a	3.1.1 Typo – no apostrophe: “Once made (that is adopted) neighbourhood plans are...”	Noted.
Individual	n/a	3.1.2 “At the submission stage the Council will take a lead on finalising the plan.” Whilst it certainly takes a lead in procedural/administrative matters, ‘finalising’ here suggests that the Council fulfils the roles of the Examiner and/or plan-maker. Please rephrase.	Noted. SCI will be amended to reflect this.
Individual	n/a	I am doubtful that this section on Council Support, with its use of such loose phrases as “generally speaking”, adequately describes the setting out of the Council’s policy as required by The Neighbourhood Planning Act 2017 (Commencement No. 3) Regulations 2018 UK SI 2018 No. 38: Regulation 4(a) brings into force section 6 of the Act. Section 6 amends section 18 of the 2004 Act to require a local planning authority to set out their policy for discharging the duty to give advice or assistance to qualifying bodies to facilitate proposals for neighbourhood development plans (including proposals for the modification of neighbourhood development plans) or orders.	Noted.

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Individual	n/a	<p>3.4.2 The GDPR is certainly an obstacle (as a protection) to the dissemination of contact details. Therefore, I would ask that in properly setting out the Council's policy, you would commit to utilising the Council's communications & engagement systems (including contact databases) to raise awareness and assist with the consultations that are required through the neighbourhood planning process.</p>	
Individual	n/a	<p>4.1.1 CIL is levied on developments rather than developers.</p>	Noted.
Individual	n/a	<p>Whilst the SCI explains CIL only in terms of the stages of preparation to adoption, it does not explain the opportunities for community involvement in the investment of its proceeds. To omit this is a significant omission. To hive off information on this to another document or later would diminish the purpose and role of the SCI in setting out how the Council involves community in planning.</p>	Your concern is noted.
		<p>The Council should commit to engaging with the local community to agree with them how best to spend the 'neighbourhood portion' of the levy. The neighbourhood portion is made up of 15% of the overall CIL levy charged on development (subject to capping). However, where a development is granted planning permission within the boundary of a made neighbourhood plan the neighbourhood portion would be 25%. Furthermore, the neighbourhood portion of CIL can be spent on a wider range of projects than the remainder of CIL provided that it is demonstrated that they support the development of the area. Both CIL and planning obligations are now an important part of plan-making and its delivery of sustainable development. These are significant features that should be brought to greater public attention and for the Council to proactively seek to involve them in these opportunities.</p>	
		<p>Monitoring and reporting on CIL and planning obligations is now through the preparation of Infrastructure Funding Statements published at least annually (in addition to the Council's good practice of periodic and regular Section 106 reports to Committee/Cabinet). As national planning guidance explains: "Why is reporting on developer contributions important? Reporting on developer contributions helps local communities and developers see how contributions have been spent and understand what future funds will be spent on, ensuring a transparent and accountable system"(PPG category CIL para172 Reference ID: 25-172-20190901).The Council should commit to raising awareness of the benefits of these planning mechanisms by referencing them in the SCI as outlined above.</p>	

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Individual	n/a	<p>The aim of the SCI at para 1.3.1's 5th bullet point is to ensure that all sectors of the community can put forward their ideas of (sic – probably should read 'or') views about issues... . I cannot find a specific place in this SCI that would direct and enable me and others to put forward ideas or views that are other than responding to planning applications or to plan-making proposals that are being consulted on by the Council. For example, having been prompted by the latest iterations of the NPPF and PPG, how and where should I ask the Council to bring forward Article 4 Directions that protect the primary shopping frontages/cores of the borough's town centres to protect their vitality and viability in the face of 'Class E permitted development' consequences.</p> <p>The point here is not one about the appropriateness of Article 4 – I could have used the example of preparing for biodiversity net gain/off setting etc. Whatever I use as an example of an idea/view, I am asking where in the SCI one "can put forward ideas or views on matters" (other responding to planning applications or plan-making) "and feel confident that there is a a formal process for considering these" (as you write). You have proposed this to be part of the aim of the SCI, therefore, you ought to specify the way/provide signposts on how this will happen.</p>	<p>Noted however there is nothing stopping an individual contacting the Council's planning teams using the contact details provided in the 'Contact sheet'. All queries we receive are taken seriously and properly investigated. What can be done however is make it clearer how to contact the Council.</p>
Individual	n/a	<p>5.2.2 In 2014-15 the Council did enable local communities to co-produce several Conservation Area Character Appraisals and it would be beneficial if this good or best practice continued.</p>	Noted.
Individual	n/a	<p>That a commitment to publish pre-application advice at the time of originating and not wait till an application has been submitted should be stated here. I believe that, for example, the Royal Borough of Kensington & Chelsea does this as a general rule. There is considered advice, particularly on the inter-related matters of transparency and increasing public opportunities for reasonable democratic scrutiny and accountability of the development management process. The 10 Commitments document of January 2014 was published by the Local Government Association and the British Property Federation with endorsements from other significant parties. Commitment 9 (p18), from my reading, advises that there should be a presumption for pre-application stage discussions to be open to all, and that confidentiality has to be justified, particularly in light of the Freedom of Information Act 2004 and the Environmental Regulations 2004. This openness should prevail when commercial confidentiality does not figure.</p>	<p>The Council offer pre-application advice as a confidential service.</p>

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Individual	n/a	<p>Note also that Commitment 10 advises that all involved in pre-application engagement should maintain an agreed record of information etc. Therefore, it ought to be incumbent on the Council to keep and maintain proper records of meetings and so forth.</p> <p>These Commitments were then further evolved by the Local Government Association and Planning Advisory Service in June 2014. Whilst section 4 sets out the merits of actively engaging communities at the earliest stages of development, it is to Section 2 I wish to draw your attention to, in particularly the part on 'Confidentiality' (p10). Once again it references the Fol Act and EIRegs, in conveying the message that the default position is one of open disclosure. Only if the prospective applicant requests confidentiality should the authority consider this request.</p> <p>In light of the above the Council should set out here a procedural policy of open disclosure and state that any request for confidentiality is treated on a case by case basis.</p>	Noted.
Individual	n/a	<p>6.7.3 It has been indicated by another that Weekly Lists are no longer available and that this webpage link does not work. Please clarify.</p>	See response in row 10.
Individual	n/a	<p>6.8.1 & Table 2 (or possibly 6.10 Viewing and Commenting on a Planning Application) The SCI is silent on what information is available to consultees. Two important subjects are Viability Assessments and Planning Obligations, both of which are not usually available when during the prescribed statutory periods of consultation. Without these a full and proper response often cannot be made.</p> <p>For viability assessments the onus is on full disclosure and any redacted parts should be fully justified. PPG Viability para 10 says "This National Planning Guidance sets out the government's recommended approach to viability assessment for planning. The approach supports accountability for communities by enabling them to understand the key inputs to and outcomes of viability assessment". It goes on to say more about transparency. [Reference ID: 10-010-20180724]. The Council should commit to this degree of disclosure and availability in this SCI.</p>	This is beyond the remit of the SCI at present, however the Council will take this on board and explore how transparency can be improved.

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Individual	n/a	<p>For planning obligations (S106), the draft heads of terms should be disclosed sufficiently early on in the process to allow local communities to influence what is required to mitigate the impact of a development. After all they have the lived experiences of living and/or working, accessing services etc. within the vicinity of a development proposal and understand the prevailing pressures or opportunities. The Town & Country Planning (Development Management Procedures)(England) Order 2015 No.595 Article 40(3)b requires proposed planning obligations be entered into Part 1 of the Planning Register. Simply publishing the Heads of Terms along with the Officer report to the Planning Committee a week/5 days before meeting is not good enough. For this denies the community being able offer their insights, knowledge and experience at a sufficiently earlier enough stage to be able to influence the outcome and is not in accordance with the cited Regulations.</p>	<p>Your concern is noted and the Council will look into what can be done about this.</p>
Individual	n/a	<p>It would be helpful to bear in mind, as Covid related restrictions wax and wane, that potential respondents may have difficulties in meeting conventional consultation periods. Prospective applicants with their pre-application consultations could be reminded of this.</p>	<p>Noted. We will bear this in mind.</p>
Individual	n/a	<p>A commitment to structured monitoring and assessment as to whether the aims and envisaged outcomes (your paras 1.3.1 &1.3.2) are being achieved should be explicitly set out here. Reliance on the Council's own review and the taking on board of 'feedback' is insufficient. The 'feedback' needs to be proactively sought, analysed and the analysis published and available for scrutiny.</p> <p>It is important for the Council to assess the effectiveness of the SCI and to monitor the success rates of the various methods/approaches being used through periodic tracking of views and experiences of a representative survey group of residents, community groups and businesses. This is made all the more important as we move permanently to more on-line consultations, the digitisation of the planning process and the promised planning reform of the planning system. Even now not all potential persons or organisations are comfortable or are able to cope with the move to on-line processes. Furthermore, in order to ensure that the engagement is truly inclusive, effective and maximised (your phrase) those 'whose voices are seldom heard' in the planning process ought to be positively approached and asked for their 'feedback' on how to better outreach and engage.</p> <p>The points raised here under this Section have general relevance to other parts of the SCI.</p>	<p>The Council will look into how it can integrate a structured monitoring framework into the SCI in the next review.</p>

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Individual	n/a	Regarding the glossary, AMR: write “Authority Monitoring Report (AMR): ...previously known as Annual Monitoring Reports...” rather than start with Annual Monitoring Report.	Noted.
Individual	n/a	Regarding the contact sheet, this is useful. Without wishing to detract from clarity, perhaps, add the web page links for such well used functions as ‘Planning Search’, ‘Planning Committees’.	Noted. SCI will be amended to reflect this.
Organisation	Gatehill Residents' Association	Regarding section 2.4 - As officers who are assessing the applications have 8 or 13 weeks from date of validation to determine the application, it would be useful for an extra 7 days to be added to the consultation period (21 days to 28 days) to recognise that neighbours, local residents and businesses also have to work under different circumstances in the event of future social distancing, for example some residents are unable to access information due to libraries being closed.	The Council has generally been flexible on it's consultation period during the pandemic to take account of these issues and it is agreed that in the event of future social distancing measures, similar flexibility could be applied. How this flexibility should be applied however should be done on a case by case basis, in the Council's opinion.
Organisation	Gatehill Residents' Association	Regarding section 2.5.7 - We welcome the Council's intention to actively engage the community and other key stakeholders in the plan-making process. The document does not say how the Council intends to carry this out. More importantly, if the Council wishes to actively engage the community it needs to pledge to place weight on the local community's views and not to be swayed by property developers who are solely motivated by profits. If the local community's views carry little weight, then the local community will disengage with the process or increase its complaints. The Council should also be aware that neighbours assume that the Council will check the accuracy of 'facts' and apply planning policy in a consistent manner. They are not aware that their silence will be taken as agreement with the proposals. Neighbours are also concerned that any negative comments from them will be considered as a 'dispute' to be raised should they wish to sell their property at a later date. There is an increasing number of threats to neighbours who raise objections and most residents do not wish to be on bad terms with their neighbours.	Noted. The SCI will be amended to state more clearly when it intends to go beyond the statutory consultation requirements. The SCI was purposely worded this way to allow the Council flexibility to try alternative approaches depending on the circumstances and the type and effect of documents being consulted on, however, figure 3 does outline the various methods the Council will use to engage with the community. It is understood however that some of the wording could be strengthened to show more clearly the Council's commitment to positively engaging with communities. Regarding your other concerns, this is beyond the remit of the SCI however the Council will explore outside of the SCI how it can tackle these issues.

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Organisation	Gatehill Residents' Association	Regarding section 6.3.1 - Box 6 of the process refers to the drafting of a report by the case officer. If the application is to be decided by a Planning Committee Meeting rather than by delegated powers, at the moment, this report is made available to applicants and objectors one week before the application is to be heard (box 7). The report has to be submitted to Democratic Services at least one week before its publication by the case officer so it would be helpful if a copy was sent to the applicant and objectors contemporaneously.	Noted
Organisation	Gatehill Residents' Association	Regarding section 6.5 - This section appears only to apply to major applications. The Council should consider how it could ensure that applicants of minor applications could undertake consultations with their neighbours and residents' associations and how this could be evidenced.	Pre-application consultation by applicants is encouraged rather than mandatory. It's usefulness is highlighted in section 6.5. This section does not apply to only major applications however it is stated that level of engagement encouraged will depend on the scale of development proposed.
Organisation	Gatehill Residents' Association	Regarding section 6.7 - The Council is seeking to continue with its minimum statutory 21-day consultation which is disappointing and we suggest that this is extended to the 28 days which was the timescale previously set when site notices were erected. Reasons - (i) Current practise of posting neighbour letters by second class post reduces actual the time for the consultation by up to 7 days. (ii) Neighbours are rarely planners, are often engaged in fulltime employment, have family commitments or occasionally go away on holiday, there is very little time for them to track down plans, understand them and then write a letter to officers to raise material objections. (iii) The 21-day period does not take into account Bank Holidays or religious festivals.	Noted. The Council will review this issue. This is something that can be discussed but is beyond the scope of the SCI at present due to more thought being needed to be put into it and the resource and cost implications that would result from such a change. If necessary the Council will conduct an earlier review of the SCI.

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<p>Organisation</p>	<p>Gatehill Residents' Association</p>	<p>Regarding section 6.8.1 - We note the intention only to reconsult if the Council considers that 'substantive' new issues are proposed. This is also the current situation. It would be better if objectors were routinely reconsulted so that objections or petitions could be withdrawn if plans have been amended in such a way that their reason for objecting had been addressed. This would save the officers' time and speed up the decision-making process.</p> <p>It would be better to reconsult direct neighbours on all amendments to avoid officers making errors due to a lack of accurate information of the relative position of neighbouring properties. For example, a 'minor' amendment to the location of a side facing window was proposed by the applicant. The neighbour was not advised. The plans were approved and the neighbour's private seating area in the rear garden became overlooked by the relocated window. The neighbours would have objected if they had been aware of the proposed change. You can imagine the bad feeling which has arisen.</p> <p>If the Council does not intend to routinely reconsult it must clearly state in the notice to consultees that they will not be reconsulting and advise consultees to check the Council's website regularly to look out for amendments to plans and any additional documents.</p>	<p>While it is appreciated that communities would want an opportunity to comment on any and all changes to a proposed scheme, planning officers' must use their planning judgement to reconsult only if those changes that could have a potentially significant effect. The Council needs to be mindful of ensuring communities have an opportunity to be involved in the planning process, but also of not unnecessarily delaying the planning process. It must also be mindful of resource implications. Planning officers would use their planning experience and knowledge to determine what amendments to a scheme require reconsultation.</p>
<p>Organisation</p>	<p>Gatehill Residents' Association</p>	<p>Regarding the Planning Application procedure table on page 29 - This proposal would bring Hillingdon into line with most other LPAs. Those wishing to make comments must be advised that their comments will be made available on the Council's website. Currently, the Council makes the personal details of those making comments available to applicants so I trust that this practise will cease as it clearly, because of a natural desire to preserve neighbourliness, acts as a barrier to honest objections.</p>	<p>This is noted. Due to an oversight this provision was included despite not being possible at present due to GDPR and resourcing issues. The current practice will continue for the time being, with details of comments made being summarised in the Officer's Report and anonymised rather than being published on the website.</p>

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<p>Organisation</p>	<p>Gatehill Residents' Association</p>	<p>Regarding the Planning Application procedure table on page 31 - I understood that objectors had the right to appeal to the High Court if they believe that the Council had made procedural errors. Has this right been removed? If not, it should be included in Table 2.</p> <p>The lack of right of appeal for objectors raises the importance of officers taking the comments from objectors seriously. Rarely does the officer seek evidence from either the applicant or the objector when 'facts' are in dispute. Once permission has been granted, rarely does the Council use its powers to invalidate the permission due to the applicant misleading the council. Applicants should be advised at time of making the application that their planning consent will be invalid if they have supplied the Council with misleading or inaccurate information.</p>	<p>A link to a guide to the planning appeal process which will advise on what you have mentioned can be included in the SCI.</p>
<p>Organisation</p>	<p>Gatehill Residents' Association</p>	<p>Regarding section 6.9 - In the event of social distancing, the council is proposing to accept dated photos from the applicant. I do not agree with this. Surely, by their very nature, extensions, alterations and development work takes place outdoors. Officers must view the site in person. If an applicant refuses to allow an officer to view the site in person the application should be put on hold until the site can be visited by the officer. Photographs are frequently misleading and can give a false impression. If the Council decides to rely on photographs from the applicant, the photographs should be put on the Council's website so that neighbours can see whether the photographs are misleading.</p>	<p>Officers will always view the site if it is safe to do so. Paragraph 6.9.3 suggests alternative arrangements only where the Council considers it appropriate.</p>
<p>Organisation</p>	<p>Gatehill Residents' Association</p>	<p>Regarding section 6.10 - The right to raise objections is an absolute right. We are experiencing an increasing number of threats and attempts to intimidate by applicants. If the Council is serious in wishing greater involvement from the local community, it must take steps to advise applicants in writing that objectors have the absolute right to comment on their planning application.</p>	<p>Your concern is noted. It is considered that paragraph 6.10.1 makes it clear that anyone can comment on a planning application.</p>

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Organisation	Gatehill Residents' Association	<p>Regarding section 6.11 - The list of examples of material objections is helpful, figure 10. It does however include the following line in the first example 'This can also include emerging plans that have been through at least one round of public consultation'.</p> <p>Previously, when we have raised objections pointing out that proposed plans do not conform with emerging policy, even policy which has been considered acceptable by the Inspector but not yet adopted by the full Council, officers have stated to members at a North Planning Committee meeting that if the application is refused and the applicant appeals then the Inspector will likely approve the application as the new policy has not yet been formally adopted. The specific example can be provided if you would like further information.</p>	<p>This is noted and it will be useful to discuss this however that emerging plans that have been through a round of consultation are a material consideration is factually correct. The weight given to it however will depend on a number of things.</p>
Organisation	Gatehill Residents' Association	<p>Regarding para 6.12.2 on appeals - A sentence could be added in here advising objectors that they may also submit further information to the Inspectorate.</p>	<p>Noted. The SCI can be amended to include a guide to the appeals process.</p>
Organisation	Gatehill Residents' Association	<p>Regarding section 6.13.1 on enforcement - As the Council relies heavily on information from residents, and there is an increase in threats from those who are being investigated, a sentence should be added here that the personal information of the person who makes the report will be protected.</p>	<p>Noted. The SCI will be amended to include a guide to the enforcement process, including on questions about anonymity.</p>
Organisation	Gatehill Residents' Association	<p>As we know, everyone has a legal right to object to a Planning Application. We also know that in order for the Application to be considered by the relevant Planning Committee an objection must be backed-up with a Petition signed by at least 20 residents. In the case of an application where there are objections but no petition the system for approving or rejecting is opaque. It is not clear what the internal review procedures consists of and whether there is a check list of possible pitfalls. Objectors such as the Gatehill Residents' Association (GRA) speak for many members, in our case 191 households who elect committee members annually. It would improve the process if an objection from the GRA did not need to be backed-up with a petition, but taken as-read that there is the required level of support for that objection.</p> <p>We at the GRA have been concerned that in two recent cases obvious mistakes have been made in the process of checking an Application and in answers given at a Planning Committee meeting. This highlights the need for more rigorous application by officers of the rules and also points to the need for more training or retraining. Having in these cases raised genuine objections of fact, it would have been helpful in these two cases, and in the future, if the Officer was encouraged to open a dialogue on our objections.</p>	<p>Noted. This is a matter to be discussed separately from the SCI</p>

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Organisation	Affinity Water	A general comment on the SCI, advising how Affinity Water wish to be consulted going forward.	Noted.
Organisation	Highways England	A general comment on the SCI, advising how Highways England wish to be consulted going forward.	Noted
Organisation	Highways England	With regards to Local Plan documents, we are interested in the council's approach to highway and transport matters in relation to regeneration and new development. We are keen to understand how local authorities initially identify and prioritise transport improvements in order to deliver sustainable development. Specifically, how local authorities set and implement policy to manage trip demand and ultimately how these might contribute to the safe and efficient operation of the SRN for which we are responsible.	Noted however this is a query not within the scope of the SCI. A separate discussion about this will be arranged.
Organisation	Highways England	With regards to planning applications, we are interested in the potential impact that the development might have on the SRN, and whether there would be any adverse safety implications or material increase in queues and delays on the SRN as a result of development or detrimental environmental visual impact.	Noted. The Council will take this on board however a separate discussion about this will also be arranged.
Organisation	Highways England	We have reviewed the SCI and we are satisfied that the outcome of the consultation will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109). Based on this, Highways England does not offer any comments on the consultation at this time.	Noted.
Organisation	Canal and River Trust	The Trust is generally supportive of the Councils production of this SCI which provides clarity on how consultees and stakeholders will be involved in the preparation and review of planning policy documents and consideration of planning applications. As only about 4% of the land adjacent to our waterways is actually owned by the Trust, our waterways are highly vulnerable to the impact of development by others. The ability to influence such developments through the planning and design process is therefore of utmost importance to us.	Noted.

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Organisation	Canal and River Trust	<p>On Plan-Making - The Trust is not currently a statutory consultee on planning policy but recognises and values the important role of planning policy in not only protecting our network of canals, rivers and docks from inappropriate development, but also in unlocking the potential of the inland waterway network for the greater benefit of an area and its communities. Our waterways can provide significant benefits in terms of wellbeing and we believe that the formation of planning policy that identifies and includes approaches for promoting access to our network is highly important for helping to realise the positive benefits of our network to local communities.</p> <p>Given the multi-functional nature and varying characteristics of the waterways there is no 'one-size fits all' planning policy and we believe there is a need to strengthen existing planning policy at all spatial levels to provide a robust policy framework that supports canals, rivers and docks as a cross-cutting policy theme. The Trust would therefore wish to be engaged with in the production of those policy documents relevant to its waterways.</p> <p>We welcome reference to the Councils Planning Policy database of interested parties.</p>	<p>Noted. We will ensure the Canal and River Trust are involved in the plan-making process.</p>
Organisation	Canal and River Trust	<p>On Neighbourhood Plans - The Trust is happy to engage with communities working to produce Neighbourhood Plans likely to impact our waterways and has produced its own guide on planning for waterways in Neighbourhood Plans. This has been forwarded to town and parish councils and is available on the Trusts website at: https://canalrivertrust.org.uk/media/original/32800-planning-for-waterways-in-neighbourhood-plans.pdf</p> <p>As Neighbourhood Plans are generally produced by local communities it is sometimes the case that we only become aware of such documents at a very late stage in their production once submitted to and consulted on by the local planning authority which is far from ideal. It would be helpful if groups could be given contact details for all relevant consultees and interested stakeholders to assist with early engagement and consultation. The Trust would wish to be included in any such list.</p>	<p>Noted. The Council will ensure this is taken on board for current and future neighbourhood plans.</p>
Organisation	Canal and River Trust	<p>On CIL - It would be helpful if the SCI also included details of how stakeholders will be able to engage with the identification of all projects eligible for CIL funding going forward.</p>	<p>Noted. The Council will expand on this in the SCI.</p>

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Organisation	Canal and River Trust	<p>On Development Management - The Trust is a statutory consultee in the development management process and LPAs are required to consult us before making a decision on certain types of planning applications likely to affect our waterways. We note reference to consultation with the various statutory and non-statutory consultees within the SCI.</p> <p>For your information, details of the defined areas where we should be notified of any planning applications likely to affect our waterways can be found at https://canalrivertrust.org.uk/specialist-teams/planning-and-design/our-statutory-consultee-role/planning-applications/our-notified-area</p>	Noted
Organisation	Canal and River Trust	<p>Our waterways are multi-functional assets and as such there are a wide range of matters of potential interest to us. We are more than happy to enter into discussions, with local planning authorities (LPAs) and applicants/developers and positively encourage pre-application discussions so that any issues and potential mitigation can be highlighted early in the planning process. We would be pleased if the SCI could include the following link to the Trusts pre-application process: https://canalrivertrust.org.uk/specialist-teams/planning-and-design/our-statutory-consultee-role/what-were-interested-in/pre-application-advice</p> <p>As part of this we can also direct applicants to other areas of the Trust for advice in our capacity as landowner such as access and discharges to the waterway.</p>	Noted. While it won't be included in the SCI specifically, the Council can at a later date publish a list of useful contacts to sit alongside the SCI. The Council will need time to come up with a list of useful contacts. In the meantime the Council can advise applicants of the pre-application service of this.
Organisation	Canal and River Trust	<p>The NPPF highlights the benefits of early engagement and states that LPAs have a key role to play in encouraging parties to take maximum advantage of the pre-application stage and should encourage engagement with statutory and no-statutory consultees before submitting their application. We are pleased to note that this is reflected in the SCI.</p>	Noted.
Organisation	Canal and River Trust	<p>We would also welcome the LPA directing applicants to relevant statutory consultees for preapplication advice as part of this process. Paragraph 6.5.1 could be amended to read: Whilst not mandatory, the Council encourages applicants to engage with the owners / occupiers of neighbouring land / premises and wider community, including relevant statutory consultees at the earliest stage of preparing their development proposal (pre-application stage) where it will add value to the process and the outcome.</p>	Agreed.
Organisation	Transport for London	<p>2.1.2 - The London Plan is developed by the Mayor of London. The Greater London Assembly provides input and feedback but it is not responsible for the London Plan</p>	Noted. The SCI will be amended to reflect this

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Organisation	Transport for London	2.3.1 - Within London there is no Duty to Cooperate with County Councils but there is a requirement to work with the Mayor of London and Transport for London (See Policy SD2 and paragraph 2.2.7 of the London Plan 2021)	Noted. The SCI will be amended to reflect this
Organisation	Transport for London	2.3.4 - It would be helpful to provide clarity on the relevant organisations and other stakeholders that appear on the list of specific and general consultation bodies and for this list to be included as a table or a separate appendix	Noted. A user-friendly version of this can be published at a later date to sit alongside the SCI.
Organisation	Transport for London	6.3.1 - The two stage requirements for referral of planning applications to the Mayor of London are not fully reflected in figure 8 (More information can be found here https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/what-powers-does-mayor-have-planning-applications).	Noted. The SCI will be amended to reflect this
Organisation	Transport for London	6.7.4 – The list of statutory consultees should include Transport for London in its role as the highways authority for the Transport for London Road Network and as the strategic transport authority with an interest in all applications that are referred to the Mayor or are likely to give rise to transport impacts	Noted.
Organisation	Transport for London	6.8.1 – Table 2 should show how the process of referring applications to the Mayor forms part of the overall application and decision making process	Noted. The SCI will be amended to reflect this
Organisation	Transport for London	6.11.1 – Figure 10 should make it clear that transport issues beyond traffic and highway safety including access, capacity, connectivity, parking and safeguarding are also material considerations	Noted. The SCI will be amended to reflect this
Organisation	CPRE	We believe that plan-making at all levels must be properly open to local engagement and scrutiny. We would welcome any initiatives to engage communities earlier in the plan-making process. One of local stakeholders' greatest frustrations is that crucial components of plans, such as the scale and location of strategic sites for housing and employment, are so advanced by the time of public consultation that, in practice, there is no way to influence them. Thus, consultations often become a box ticking exercise to say they have been carried out but no substantive changes are made, or indeed could be made to the plan presented, as otherwise the whole plan would need to be reassessed	Your concern is noted and it is the aim of this SCI to encourage engagement in the planning process as early as possible in the plan-making process.

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Individual	n/a	<p>We're pleased that LBH has undertaken this update of the statement of community involvement. We are also pleased to see the continuing focus on the involvement of community groups but are concerned that LBH have not set out any policies on how to specifically increase the range of community groups it engages with or to set out any policies on measuring the effectiveness of community engagement. Doing so will hopefully increase the range of views expressed on planning matters and give local people an opportunity to give feedback on the quality and quantity of engagement facilitated by LBH.</p>	<p>Your concerns are noted and it can be made clearer in the document how the Council intends to reach a wider range of people. On measuring the effectiveness of community engagement, this would be achieved through monitoring the number and range of responses received.</p>
Individual	n/a	<p>We have further concerns about the lack of detail in the draft SCI on the tools and techniques that LBH expect to use to deliver community engagement.</p>	<p>While some details have been given (outlined in figure 3), the Council intends to use a range of methods and retain some flexibility on how it consults so that it can use the most appropriate methods for the type of document being consulted on. The Council is committed to maximising community engagement and intends to use a case-by-case approach to achieve this.</p> <p>The SCI was purposely worded this way to allow the Council flexibility to try alternative approaches depending on the circumstances and the type and effect of documents being consulted on, however, figure 3 does outline the various methods the Council will use to engage with the community. It is understood however that some of the wording could be strengthened to show more clearly the Council's commitment to positively engaging with communities.</p>

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Individual	n/a	<p>para 2.6.3 states: “during the preparation phase the Council may undertake some informal consultation.” It would be helpful to know what is intended. A “may consult” policy do not provide the certainty that communities and other interested parties need.</p>	<p>Agree that the wording should be changed to state that community engagement will take place, rather than may take place.</p> <p>The SCI was purposely worded this way to allow the Council flexibility to try alternative approaches depending on the circumstances and the type and effect of documents being consulted on, however, figure 3 does outline the various methods the Council will use to engage with the community. It is understood however that some of the wording could be strengthened to show more clearly the Council’s commitment to positively engaging with communities.</p>
Individual	n/a	<p>Para 2.6.6 states: “At this stage we can supplement the written consultations with a number of meetings and workshops and with face to face opportunities to explore the issues in real depth.” Again , It would be helpful to know what is intended. LBH should set out what “will” be done, rather than what “can” be done.</p>	<p>While some details have been given (outlined in figure 3), the Council intends to use a range of methods and retain some flexibility on how it consults so that it can use the most appropriate methods for the type of document being consulted on. The Council is committed to maximising community engagement and intends to use a case-by-case approach to achieve this.</p>

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Individual	n/a	Para 2.6.9 states “This is the last opportunity for the Council to make significant changes to the content of the Local Plan”. Is this really the case? Surely LBH have the flexibility to make significant changes later in the process if this is needed?	The most significant issues with the Local Plan should be addressed at this stage as the next stage is focused on refining and finalising policies before submission to the Secretary of State for examination. While it is possible to make further changes later, paragraph 2.6.9 is highlighting the fact that it is more difficult to make significant changes later in the plan-making process and that the Council is focused on addressing all issues with the Local Plan as early as possible. This will be made clearer in the text.
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