

Re p ID	Name	Organisati on	Comment	Section	Officer Response
1	Henry Peters on	St Quintin And Woodlands Neighbourhood Forum	This is a disappointing draft document and one which we consider needs significant additional work. As detailed below, the document fails to take account of relevant legislation and is poorly researched. In terms of encouraging involvement and engagement of local residents in the planning system (the raison d'etre of a SCI) this draft is weak compared with examples of recent SCIs from other London Boroughs (e.g. Westminster 2023, Camden 2022).	General	Noted.
2	Henry Peters on	St Quintin And Woodlands Neighbourhood Forum	This explains that LBHF's SCI dates from 2015. It does not mention the NPPG requirement that Local planning authorities must review their Statements of Community Involvement every 5 years from the adoption date. It is important that Statements of Community Involvement are kept up-to-date to ensure effective community involvement at all stages of the planning process. Therefore, a local planning authority should regularly review and update their Statement of Community Involvement to reflect any changes to engagement. Paragraph: 071 Reference ID: 61-071-20190315. While this new draft states that the revised SCI has been prepared 'under the terms of the Planning and Compulsory Purchase Act 2004' (which introduced the requirement for SCIs) no reference is made to the Neighbourhood Planning Act 2017. This legislation added further requirements on the content of SCIs, as part of Government measures to strengthen the role of neighbourhood plans. In 2018 the organisation NeighbourhoodPlanners.London published a survey of SCIs as adopted by all London Boroughs. At that time there were a significant number of London LPAs which had failed to move swiftly to review and update their SCIs to take account of the	Explanatory Note	Noted. Reference to the 2017 Neighbourhood Planning Act to be added as appropriate. The council continues to follow all statutory requirements regarding the adoption of Neighbourhood Plans as stated in the SCI.

			<p>2017 NPA. This was perhaps excusable in 2018 given that the legislation was new. But six years have since passed, which seems time enough for LBHF to have caught up with a statutory requirement. This 2018 report from Neighbourhood Planners. London commented as follows on the 2015 LBHF SCI:</p> <p>LB Hammersmith & Fulham updated and republished its SCI in 2015. The 49 page document includes a 4 page section on neighbourhood planning. This states that a neighbourhood plan must “be in compliance with the council's Development Plan.” This is inaccurate in explaining the important ‘general conformity’ requirement. The SCI includes a table at 3.19 which set out “ways in which the council will assist in supporting the development of a neighbourhood plan”. This goes some way towards meeting NPA 2017 Section 6 requirements. The Council also publishes a Guidance Note but this does not expand on non-statutory support that will be provided to neighbourhood forums.</p> <p>Hammersmith & Fulham’s SCI is non-compliant with Section 6 of the NPA 2017. It does not address the question of modifications to a ‘made’ neighbourhood plan and it is doubtful whether the requirement to explain policies on ‘advice and assistance’ is met. This piece of 2018 research was circulated to all London LPAs at the time. No effort seems to have been made by LBHF to address the above points in the updated draft now published for consultation. Significant updating seems to have been limited to more recent national planning guidance published in October 2021 in relation to COVID.</p>		
3	Henry Peters on	St Quintin And Woodlands	A number of these principles read as hollow pledges in light of inadequacies in LBHF practices in respect of handling consultation on planning applications as detailed below. The	Core Principles	Noted

		Neighbourhood Forum	first and last 'principles' (Nos 1 and 11) have clearly not been met in the drafting of the revised SCI.		
4	Henry Peters on	St Quintin And Woodlands Neighbourhood Forum	This section of the draft sets out the main policy documents that every LPA is statutorily required to prepare and publish. The statement that these will be 'co-produced' risks raising false expectations of the impact that community organisations and individuals can have on the next iteration of a Local Plan for the Borough. This section of the Draft continues Co-production is about a new way of doing things together and building a new partnership between the council and the diverse community of Hammersmith and Fulham. This is part of the council's commitment to 'doing things with residents not to them'. 'Co-production', where it is meaningfully carried out by public bodies, is hardly a 'new' concept and this sentence comes across as trite.	Planning Policy	Noted
5	Henry Peters on	St Quintin And Woodlands Neighbourhood Forum	The Draft includes the sentence The council is required to review the Local Plan every five years in line with legislation. There is no explanation of why in 2025 the Council is continuing to rely on a 2018 Local Plan and a set of policies in a 2013 Development Management Local Plan. No timeline is given for remedying this position.	Local Plan	The timeline for the adoption of a new Local Plan is set out in the councils Local Development Framework.
6	Henry Peters on	St Quintin And Woodlands Neighbourhood Forum	This section is clear and helpful in explaining that SPDs can 'add detail' but 'without adding new policy'. A link to where the Council publishes its set of SPDs would be useful for the public. A four week period for consultation is tight for local organisations which need to arrange public meetings for a SPD which might impact significantly on a part of the Borough. A six week period is more standard for such consultations.	Supplementary Planning Documents	The Council consider that a four week consultation period is appropriate for such documents and allows sufficient time for individuals and organisations

					to respond to consultations. The four week period is expressed as a minium and reserves the right to extend consultations where this is considered necessary.
7	Henry Peters on	St Quintin And Woodlands Neighbourhood Forum	No comments on this section of the document.	Community Infrastructure Levy	N/A

8	Henry Peters on	St Quintin And Woodlands Neighbourhood Forum	<p>This section states designated community groups as part of a designated Neighbourhood Forum in a clearly demarcated Neighbourhood Area now have the opportunity to prepare their own Neighbourhood Plan. The 'now' is redundant given the neighbourhood planning framework has been in place since 2012 (when regulations came into force). This section of the document is brief and does little to encourage interest amongst local residents in embarking on a neighbourhood plan. • it does not explain the potential for an existing residents association or community group to achieve designation as a forum. • It does not refer readers to the additional more detailed LBHF guidance on neighbourhood planning available from 2016 and still published on the LBHF website. In a series of comparative surveys of London Boroughs and their approach to (and level of support for) this 'localist' layer of the English planning system, LBHF consistently comes across as reluctant in its support. In a 2021 study of the designation decisions made by all London LPAs, LBHF was grouped along with Hackney, Tower Hamlets and Kingston as Boroughs in an 'interventionist/resistant' category. The common feature of this group being councils which interpret the statutory criteria and conditions for designation in ways that go beyond the legislation. As a result they create for residents associations and community group some extra hurdles and hoops to jump through. Boroughs vary in their approach to neighbourhood planning. City of London is explicit that it takes a 'minimal compliance' stance towards this part of the planning system. LBHF is perceived in similar vein. By 2021 the Borough had two of the 'orphan' neighbourhood areas in London, out of a total of 11 across London (these are areas which have been designated as a consequence of the 2011 legal requirement that a LPA must designate at least part of an area applied for.</p>	Neighbourhood Planning	Noted. Reference to the 2017 Neighbourhood Planning Act to be added as appropriate.
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		<p>By refusing designation of the forum that has applied for designation, such areas are left in limbo. On a further set of designation applications (Avonmore/Brook Green/Addison) the Council refused designation of a forum on questionable grounds and argued As a consequence of the decision to refuse the application for the forum, the council also refused the application for the neighbourhood area. We are not aware of similarly negative decision-making anywhere else in London. LBHF is of course entitled to take a view that it does not wish to engage positively with neighbourhood planning. But this stance is hard to reconcile with statements in the SCI on 'co-production' and the claim the 'principles' espoused in this document are part of the council's commitment to 'doing things with residents not to them'. As has been flagged up in the past with LBHF, precise use of terminology is important in explaining the scope of neighbourhood planning and the extent to which these plans can fine tune or flex local plan policies. Examples in the draft SCI, which we consider need re-editing before the document is adopted, are as follows:</p> <ul style="list-style-type: none"> • The SCI states that a NP allows communities to establish general planning polices complementary to those of the council's Local Plan that help shape the growth and development of the designated area. This is a misreading of the legislation and the sections of the NPPF on plan-making. Neighbourhood plan policies are neither intended nor required to be 'complementary' to those in a local plan. They must be 'in general conformity with the strategic policies' in a local plan – a quite different requirement. They may address 'non-strategic' matters that do not feature in the local plan. • The NPPF is clear that Neighbourhood planning gives communities the power to develop a shared vision for their area (para 29). And that Once a neighbourhood plan has been 		
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			<p>brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or nonstrategic policies that are adopted subsequently. NP policies take precedence in determining applications and not 'complementary' in such a scenario. To claim otherwise is inaccurate.</p> <ul style="list-style-type: none"> • The LBHF Draft SCI also says: Once a neighbourhood plan or order has been prepared, an independent examiner will check to ensure that it meets the right basic standards. Why substitute the term in the legislation of 'basic conditions' (and give an explanation of these, or at least a reference to the legislation) rather than introduce new terminology? Implying that there are some undefined 'standards' which a draft neighbourhood plan must meet is off-putting to resident groups considering this route. • Section 6 of the 2017 NPA (not mentioned in this draft SCI) amends the Planning and Compulsory Purchase Act 2004 in respect of SCIs, adding the duty to give 'advice and assistance' to a forum preparing a neighbourhood plan. The consultation draft deals briefly with this, but in a way which is less user-friendly and lacks practical detail than in the equivalent 4 pages of the 2022 guide from City of Westminster. • In the glossary on page 48 of the Draft SCI, the explanation on neighbourhood plans ends by saying As such, they must be in conformity with the council's Local Plan. As we have many times reminded LBHF officers, the legislation and NPPF are clear that the content of a NP must be in general conformity with strategic policies in a local plan. This full wording is crucial and its interpretation has been the subject of extensive case law. 		
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			<ul style="list-style-type: none">• It is for the LPA to define which of its policies are 'strategic' with reference to NPPG criteria. There is significant scope within neighbourhood plans for variation of non-strategic policies and/or the addition of new non-strategic policies within a neighbourhood plan. This wording in the draft SCI is again misleading, either by accident or intentionally, and should be corrected.		
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9	Henry Peters on	St Quintin And Woodlands Neighbourhood Forum	<p>In line with NPPF guidance, the Draft SCI encourages and promotes early engagement by applicants and developers where major schemes are involved. The Draft refers to three forms of such engagement (public exhibitions, Planning Forums, and an Inclusive Design Panel made up of 'disabled residents'). These are welcome forms of engagement, but not particularly proactive in comparison to what is now 'best in class' on early engagement and pre-application consultation by London LPAs. We can find no record of Planning Forums that have been held on major schemes, on the LBHF website. Does LBHF routinely publish copies of pre-application advice, once an application is validated and published? The SCI should make the position clear. A growing number of London LPAs use externally facilitated Design Review Panels and Community Review Panels convened to discuss developer proposals at a stage well before these are finalised. Such sessions cover all aspects of a scheme, including location, connectivity, public transport access and are not limited to inclusive access for people with disabilities. LBHF practice, and any future intentions, should be explained in the revised SCI. City of Westminster published its Early Community Engagement Guidance for applicants and developers in February 2022. The guidance supports applicants and developers to deliver best practice early community engagement on emerging development proposals. This guidance places an emphasis on the role of civic amenity societies, provides information on the views of these bodies can be accessed, and encourages the public to write in to the LPA with views on emerging proposals at pre-application stage. The guidance also sets out what applicants should cover in their own SCI to be submitted with a major application.</p>	Planning applications	<p>The SCI does not limit the level of engagement that applicants can undertake when formulating a proposal for development, and the Council continues to encourage developers to go above and beyond the methods of engagement suggested in the SCI. It is not standard practice for pre-application advice to be made public. This is to encourage constructive dialogue between developers and local planning authorities, and to protect commercially sensitive information. Making pre-application</p>
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					advice public risks discouraging developers from seeking advice potentially leading to poorer quality applications and higher refusal rates.
10	Henry Peters on	St Quintin And Woodlands Neighbourhood Forum	The Draft SCI briefly rehearses the statutory requirements for public consultation on applications. What is not acknowledged nor explained in the SCI is that LBHF is one of minority of London LPAs which does not publish all representations and responses received on an application, as part of its online planning register. A 2018 survey of practices across all London LPAs identified 11 Borough Councils which adopt the same practice of non-publication. Others publish all representations online, with varying approaches to redaction of personal details to comply with GDPR. For the public, it is of course helpful and informative to be able to see how other parties have reacted to a set of development proposals. Where residents groups and amenity societies have identified potential grounds for objection (or support) this is important information which should be available to local residents. For a LPA to choose not to publish representations is hardly a	Planning applications	Noted. All comments on planning applications are available on request.

			<p>characteristic of a 'proactive' council seeking to maximise engagement with its citizens on planning issues. While a significant workload is involved in making redactions to representations prior to publication, most other Boroughs manage to this and there are digital tools which can help with the task. The current application from ECDC at Earls Court has a huge potential impact for the Borough. The proposed development crosses Borough boundaries. Submitted in October, there are already some 370 representations published on the RBKC online planning register. Numbers will increase prior to determination of the application. How is LBHF intending to handle those which the Council receives? Making copies available for inspection at the Town Hall? Sending copies to those individuals and organisations which request them? In this section of the SCI, we ask that LBHF explain to the public why it continues to follow a practice of non-publication of representations and whether it has plans to improve its systems in this respect? Our experience is that copies of all representations will be provided on request, but will this happen on an application which prompts several hundred representations, such as the ECDC proposals?</p>		
11	Henry Peters on	St Quintin And Woodlands Neighbourhood Forum	No comments.	Appeals	N/A
12	Henry Peters on	St Quintin And Woodlands	No comments.	Planning Enforcement	N/A

		Neighbour hood Forum			
13	Henry Peters on	St Quintin And Woodland s Neighbour hood Forum	No comments.	Assessment and Monitoring	
14	Henry Peters on	St Quintin And Woodland s Neighbour hood Forum	Since the adoption of the current version of the SCI in 2015, the Old Oak and Park Royal Development Corporation has taken over planning powers and functions in parts of North Hammersmith. The revised SCI could usefully include a map and information explaining to the public how planning applications are consulted on and determined in this part of the Borough along with links to relevant OPDC documentation (Local Plan, SPDs, guidance on enforcement).	General	Noted.
15	Sharo n Jenkin s	Natural England	No comments.		N/A
16	Patric k Litton		Thank you for these documents. I can see that the policy outlines key advantages for interested parties to have their say in terms of transparency and empowerment. But, I can also see that this will be time intensive and interest/ability to engage meaningfully in this process difficult, not only owing to the reuwiremh to satisfy legal obligations but also because the papers are complex and response times are limited.	General	Noted.

17	Tony Boys		<p>Very laudable aims – and of course community involvement in planning has been a strong theme for many years now. Do you have any records which show the extent to which community involvement in planning has been achieved over the last few years ?I.e. how many local residents and residents' groups have taken part in the planning process either at a strategic, or operational or reactive level? Would you have somewhere a register of the known residents groups across Hammersmith and Fulham so that you can see the level of penetration? Those would be useful and possibly guide your processes going forward.</p>	General	<p>The council does not collect data on the level of engagement with residents and organisations.</p>
18	Richard Farthing	Hammersmith Society	<p>A common concern amongst the over 100 civic and amenity societies represented by the London Forum - including ourselves – and in Civic Voice and its 322 members across the UK including 36 in London, is that consultation is too often far too late to affect proposals, and is often a one-way process where the planning authority requests feedback, receives and uploads documents, and can be seen to select favourable responses and downplay or dismiss others, especially if there is no specific policy to enforce. Proper consultation helps to prevent inappropriate development in unsuitable locations and enable proposals to be better supported by the public, delivering cost savings as well as reducing opposition. We welcome the initiative to improve the inclusion and engagement of citizens in plans for change.</p>	General	<p>Noted. The council abides by all statutory requirements when consulting the public and statutory consultees regarding planning applications.</p>

19	Richard Farthing	Hammersmith Society	<p>We have reviewed the draft SCI and are aware that others have commented in detail, notably the St Quintin and Woodlands Neighbourhood forum – with comments which we support. Neighbourhood Planners London reviewed a large number of SCI's in 2018. The report is here: https://www.neighbourhoodplanners.london/_files/ugd/95f6a3_25c3511ec1ed46f4b76dff9a9deb3821.pdf This included a review of the LBHF 2015 SCI (on page 14), finding a number of functional deficiencies that remain present in this 2024 SCI draft. Please review these, and address them wherever possible. We note a number of improvements over the 2015 SCI, driven by changes in society and technology, as well as in national planning policy. These are reflected in clearer provisions for inclusion and accessibility, and the use of digital methods of communication and engagement. We also note a strengthened expectation for developers to engage with communities at pre-application stages, with suggested minimum methods. We note that preapplication information is often made specifically available by other authorities, but rarely in LBHF, and when it is, usually as part of the developers pack, perhaps in their D&A or planning statements, not as a free-standing, independent report, which we would expect to see. While LBHF's strategy responds principally to statutory requirements, it falls short in aspects of policy, process, and practices, both in definition and operation. It remains too long and wordy at about the same 50 page length as its predecessor. It needs to be half this length or less: Westminster's 2023 document is 28 pages long for example. It must not be linked to the specifics of a version of the local plan, or general regulations and planning policy at the time etc. All of these will change, instantly obsoleting the document, which must be designed to be resilient to a reasonable amount</p>	General	<p>Noted. It is not standard practice for pre-application advice to be made public. This is to encourage constructive dialogue between developers and local planning authorities, and to protect commercially sensitive information. Making pre-application advice public risks discouraging developers from seeking advice potentially leading to poorer quality applications and higher refusal rates.</p>
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			<p>external change, especially now. Similarly it should not need to discuss how it was created, diluting the focus on engagement with the community. From reviewing the SCI's in boroughs such as Kingston, Westminster, Camden and Manchester, we are disappointed that this draft has not similarly provided clear and specific responsibilities and commitments. It appears not to have considered long established improved practice in Scotland nor the well-publicised research initiatives elsewhere, providing clear frameworks and recommendations. Overall, the document would benefit significantly from this current research, and further, needs to be written in a way that is easier for the public to engage with. It needs substantial re-work to make it into the trusted operating model of engagement we'd like to see. Consequently, we believe that, rather than a long list of comments, it would be far more useful to engage directly and constructively in a process of co-production, resulting in an exemplar Statement of Community Involvement that enables LBHF to demonstrate it is actually delivering on its published values in doing things with citizens - and not to them. This is especially valuable when the government is proposing so many changes to planning. We are prepared to commit resources and energy to this valued task, and, in anticipation, offer some headline areas for our more detailed engagement:</p>		
20	Richard Farthing	Hammersmith Society	<p>The statement "The council wants to put our communities first in the planning process..." is welcome but lacks substance. What is missing at the outset of the document is a clear statement of core values, specifically related to public engagement in plans for change that affect them. In our view, the clarity that comes with an explicit and transparent expression of the motivation for active engagement is a foundational element in increasing citizen trust - the</p>	Core Principles	Noted. Officers will review how clarity can be provided as part of the document.

			confidence that public views are actually welcomed and valued, and seen to be valued by showing that feedback has been acted upon, and can be traced. Following Government's Consultation Principles (2018), promises to citizens are more usefully expressed in terms of a clearer set of parameters such as (without structure) Purpose Clarity Inclusion Transparency Proportional Tools Feedback Agreement Timing, and Governance. Which are defined precisely, in plain language.		
21	Richard Farthing	Hammersmith Society	<p>Qualifications and caveats, typically in officialese: "it is expected that", "The council encourages", "strongly encourages", "should be made available", "should normally", "are advised" are imprecise and confusing to those trying to interpret them, who may do so in unexpected ways. We are keen to see these minimised and active language used. If insurance companies are capable, so are Councils! Further, key concepts such as "effective" bear precise definition. For example, one of Haringey's 2017 SCI intents was to "Ensure consultation is Effective", where "effective" was specified as •</p> <ul style="list-style-type: none"> By being undertaken at the earliest possible stage in the decision-making process, when proposals are still at a formative stage and when there is scope to influence the outcome. By providing relevant information and sufficient reasons for any proposal to permit intelligent consideration and response by all affected parties. By targeting consultation to make sure that relevant stakeholders are involved. By ensuring the consultation methods used are appropriate in engaging affected parties 	General	Noted.

22	Richard Farthing	Hammersmith Society	Particularly in relation to Planning Applications, the document does not set out adequately a structured framework within which more meaningful public engagement can take place, albeit that there are accepted models in widespread use. A simple enumeration of the most obvious methods of engagement and notification is not fit for purpose. There are many missing methods and processes which are appropriate across different modalities of engagement: Inform Consult Involve etc. One specific case in the draft: Newspapers are no longer 'accessible media', the planning portal is now out of date, as amply illustrated by its (poor) provision of access to the Earls Court plans, and there are more modern methods of engagement, as demonstrated by 'Commonplace' and others.	Planning applications	Noted. The council is required by legislation to undertake some forms of engagement, such as local newspapers, in certain instances.
23	Richard Farthing	Hammersmith Society	There is no process defined by which the outcome of consultations are drafted, considered and agreed before publication. Importantly there is no mechanism shown for publishing comments or actions thereon, only that "comments will be summarised within a report...", the criteria and method of assessment are non-transparent. It should be noted that LBHF is an outlier in this respect, six years ago only 11 of 35 authorities in London did not publish comments, and several more now do, redacted for GDPR reasons. A specific example is Earls Court, where RBKC currently has 1,131 publicly accessible comments, LBHF has zero.	Planning applications	Noted. All comments on planning applications are available on request.
24	Richard Farthing	Hammersmith Society	The 2019 Grosvenor survey of public trust in large-scale development found that 2% of the public trust developers and only 7% trust local authorities. Increasing and sustaining trust is imperative, an effective SCI can be the vehicle. There needs to be a defined process by which communities can hold the LPA measurably to account with the performance of its commitments to engage, such as by linking decision-making to robust, consistent and solid grounds. This is missing. The	Assessment and Monitoring	Noted. The council do not consider it appropriate to collect data on the level of successful engagement due to the different type of

			commitments made in the section on Assessment and Monitoring are not specific nor measurable in any way, as we would expect. We look forward to an opportunity to discuss how we may shape and be involved, with others, in co-producing a high-performing SCI of which the Borough may be proud, because it is backed by citizen trust.		engagement involved.
25	Michelle Statton	Historic England	Thank you for consulting Historic England on the London Borough of Hammersmith and Fulham's Draft Statement of Community Involvement (SCI) in Planning. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.	General	Noted.
26	Michelle Statton	Historic England	Historic England supports the general aims and approach to the draft Statement of Community Involvement. We also welcome acknowledgement of Historic England as a statutory consultee under the duty to co-operate (page 3). Further to this, we note that statutory consultees are referred to in respect to: Local Plans at pages 9, 13, 15, 16, the preparation on Supplementary Planning Documents at pages 20–21, and Community Infrastructure Levy at pages 26–28. However, the need to consult statutory consultees in relation to planning applications is omitted, as is any explanation of the statutory consultees' remit. We advise that this be addressed, and that it be made clear that Historic England is the statutory consultee for planning applications affecting the historic environment, with the Gardens Trust also consulted where applications affect registered parks and gardens. In London, Historic England should be consulted on a wider range of listed building consents and planning applications than elsewhere. It might therefore be helpful to include a link to our "When We Are Consulted" webpages. Similarly, it would be useful to	Planning applications	Noted.

			highlight that planning applications with the potential to affect archaeological remains require consultation with the Greater London Archaeological Advisory Service, and to provide a link to their Charter, which sets out how they should be consulted. For ease, this information might be included in a new appendix.		
27	Michelle Statton	Historic England	With regards to neighbourhood planning, we would welcome notification of proposed neighbourhood planning areas, as well as consultation on draft plans. The regulations state that Historic England should be consulted on draft plans where our interests may be affected. We have guidance on neighbourhood planning on our website.	Neighbourhood Planning	Noted.
28	Michelle Statton	Historic England	In addition to the requirements of the legislation, we would also welcome informal consultation where issues may benefit from our early involvement. As such, please note our consultation email address: LondonPlanningPolicy@HistoricEngland.org.uk	General	Noted.