

	<p style="text-align: center;"><b>Special Constitution Ethics and Probity Committee</b></p> <p style="text-align: center;"><b>9 May 2016</b></p>
<p style="text-align: center;"><b>Title</b></p>	<p style="text-align: center;"><b>Strategic Planning Pre-Application Process and Amendments to the Council’s Constitution</b></p>
<p style="text-align: center;"><b>Report of</b></p>	<p>Monitoring Officer Head of Strategic Planning</p>
<p style="text-align: center;"><b>Wards</b></p>	<p>All</p>
<p style="text-align: center;"><b>Status</b></p>	<p>Public</p>
<p style="text-align: center;"><b>Urgent</b></p>	<p>No</p>
<p style="text-align: center;"><b>Key</b></p>	<p>No</p>
<p style="text-align: center;"><b>Enclosures</b></p>	<p>Appendix A – 15. Responsibility for Functions Appendix B – 15A. Responsibility for Functions - Annex A Appendix C – 17. Meetings Procedure Rules Appendix D – 18. Public Participation and Engagement Appendix E – 27. Members Planning Code of Practice Appendix F – Strategic Planning Pre-Application Briefings – Agenda Format, Meeting Procedure and Report Structure</p>
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<h2>Summary</h2>
<p>This report arises from a review of the Council’s Constitution and the Council’s procedures and practices associated with the determination of strategic planning applications. A key proposed change is the introduction of the presentation of strategic developments which</p>

are still in pre-application stage for the consideration of the Council's Planning Committee.

The Council is proposing to enable a Strategic Planning Pre-Application process whereby developers have the opportunity to present their proposals to Planning Committee meeting before formally submitting a planning application in order to inform Committee Members of what they intend to submit and to allow Members to comment and help shape the direction of the application, where appropriate. The Strategic Planning Pre-Application process would be advisory and no decisions would be taken when these proposals were considered. The Committee are therefore requested to consider the following proposals:

1. The establishment of a Strategic Planning Pre-Application process
2. To consider the operational function of the Planning Committee which includes amendments to the relevant sections of the Council's Constitution
3. To provide suitable recommendations to Full Council in relation to 1 and 2 above

## **Recommendations**

- 1. That the Committee consider the recommended approach to the Strategic Planning Pre-Application Process as detailed in this report and associated appendices.**
- 2. That the Committee consider the proposals to improve the operational function of the Planning Committee and Area Planning Committees as detailed in this report and associated appendices.**
- 3. That the Committee recommend to Council that the Constitution be amended to incorporate the track changes versions attached at Appendices A to E.**

### **1. WHY THIS REPORT IS NEEDED**

#### **Strategic Planning Pre-Application Process**

- 1.1 This report arises from a review of necessary constitutional and procedural changes required to assist the involvement of Members of the Council's Planning Committee in the pre-application process in respect of some strategic planning applications. Strategic planning applications are generally handled by the RE Strategic Planning Team while although some are handled by the RE Planning Area Teams within the Development Management service.
- 1.2 The review was carried out in the latter part of 2015 and drew in part on the recommendations set out in the joint publication by the Local Government Association (LGA) and the Royal Town Planning Institute entitled '10 Commitments for Effective Pre-Application Engagement' published in 2014 which built on the previously published 'Connecting Councillors with Strategic Planning Applications' produced by London First and the Planning Officers Society (POS) London Branch in 2011.

- 1.3 Commitment no 8 in the 2014 document states that ‘Local Planning Authorities should ensure that their pre-application offer provides an opportunity for Councillors to be actively involved in pre-application discussions as part of a transparent process.’ Page 16 of the document states that ‘the arrangements for involving Councillors will vary between authorities, but should generally include a range of options (proportionate to the scale and complexity of the proposal) for officers to bring Councillors and developers together for the chance to exchange ideas and develop a scheme that meets the needs of the area’ and that ‘these arrangements should take appropriate account of the need for transparency and inclusion of the community.’
- 1.4 The 2011 guidance document expands on three key messages:
- It is good practice for Councillors to have formal contact with the applicants for planning permission for strategic schemes during the pre-application and determination periods.
  - Planning Committee Members can comment on the details of schemes provided he or she is clear that they will listen to all material considerations presented at Committee before deciding on how to vote.
  - Involving Councillors early and throughout the application and determination process leads to better planning decisions and better developments.
- 1.5 The main reason given in the past for Planning Committee members not being involved in schemes before they consider them at planning Committee was that they need to avoid the appearance of bias or ‘predetermination’. Predetermination involves one or more Planning Committee members approaching a decision with a closed mind, having already decided which way to vote. This is distinct from ‘predisposition’ which is legitimate and involves one or more Planning Committee Members approaching a decision with a predisposition in favour of one side of the argument or another, or with a preliminary view as to a desirable outcome, but with a willingness to reach a different view where the evidence demands it.
- 1.6 As long as a Member of Planning Committee is clear that he or she will listen to all material planning considerations presented at Planning Committee before deciding how to vote, there can be no bias or predetermination, just a legitimate position which may include an initial view on an aspect of the scheme before it has been determined (i.e. a predisposition).
- 1.7 This distinction is particularly important in the context of engaging Members of Planning Committee with applicants during the pre-application process and pre-determination stage for strategically important developments.
- 1.8 Associated with the introduction of pre-application engagement between the Planning Committee and applicants, it would be essential that those Members (including substitutes) receive training in procedural and probity rules plus the basics of spatial planning and development management before they make

any planning decisions. Refresher sessions would be required for existing Planning Committee members. Key topics for training would also include:

- Development economics and viability
- Urban and sustainable design
- Planning conditions, section 106 agreements (planning obligations) and the Community Infrastructure Levy (CIL)
- Planning Appeals – Implications and Costs

- 1.9 There are clear benefits to Barnet from the introduction of these processes. The rate of growth in London's population is not abating and the pressure on the London Boroughs to accommodate growth will remain and probably increase. The integration of the pre-application process into the Council's Planning Committee process will mean that Planning Committee members can play a greater role in the design process and input into a scheme's development before it is submitted as a planning application. As a Borough that wants to encourage high quality developments that enhance Barnet, these changes will enable the Council to do that much more effectively.
- 1.10 Some changes to the Constitution will be needed to support the introduction of a pre-application engagement process by the Planning Committee and these are set out at Appendices A – F. In addition, there are proposals to refine and develop other areas of the Constitution where the drafting or structure could be improved (specifically Meetings Procedure Rules and Public Participation & Engagement Rules) to enable more efficient and effective operation of the Council's Planning Committee and Area Planning Committees.
- 1.11 Consequential changes to the determination stage of those applications which have been through the pre-application Planning Committee process are also set out with respect to the way agendas are constructed, reports are structured and the way they will evolve through the process.
- 1.12 It is recommended that that the pre-application process is introduced as a pilot for a one year period and reviewed at the end of that period. Subject to the constitutional amendments being agreed by Council, it is proposed that Member training will take place in June and July. An initial trial of the process would take place at the Planning Committee meetings in September and October with one pre-application being considered per meeting. After this initial trial, Members can review the success (or otherwise) of the pre-application process and officers will be able to advise Members on the interest from applicants / developers. Subject to there being demand, additional pre-application meetings can be scheduled. In advance of the process being rolled-out after October, Planning will seek agreement from the Policy & Resources Committee to the additional fee / charge required to cover the council's costs of implementing this arrangement.

- 1.13 The proposed Strategic Planning Pre-Application meeting process is set out in Appendix F.
- 1.14 Introduction of the pre-application process is expected to increase the volume of business being considered by the Planning Committee. Although the level of interest from developers is not fully known at this stage, many developers of strategic sites are aware of pre-application Committee engagements processes from their experience elsewhere in London and it is anticipated that additional meetings will be required. In advance of the new arrangements being implemented the Committee are requested to consider whether it wishes to recommend that additional Strategic Planning Pre-Application meetings be added to the calendar of meetings, or whether additional meetings of the Planning Committee should be arranged as and when required. In any considering the scheduling of meetings, the Committee should be mindful of the need to balance the Planning Committee's ordinary business alongside the pre-application process.
- 1.15 Members are requested to note that the Planning Committee will not be taking any decisions when considering Strategic Planning Pre-Application briefings. Comments made and/or issued raised by Members at the pre-application stage will be recorded in the formal minutes of the meeting. When a decision is required by the Planning Committee on a matter which has been subject to pre-application consideration, planning officers will detail the outcome of the pre-application discussion in their report to the Committee on the application, including the steps that the developer has taken to take into account any representations made in the finalisation of their proposals.
- 1.16 The pre-application process provides the opportunity for Members to raise queries and identify any concerns about proposals. In a pre-application meeting it is perfectly acceptable for Members to express their predisposition on aspects of a development, provided they do not express a predetermined view on the development as a whole. Members should be careful to ensure that they are not seen to be pre-determining the application as a whole otherwise there is a risk that they will be precluded from participating in determining the application, or leave any decision in which they have subsequently participated open to legal challenge.
- 1.17 Prior to Planning Committee members considering a pre-application presentation they will be required to complete training covering the matters detail in section 1.8 of this report and in accordance with the requirements detailed in section 11 of Appendix E.
- 1.18 Members should note that they would be unable to 'call-in' a development for consideration at the pre-application stage. Developers would submit requests to the Council's Planning Service for the opportunity to present the proposal to a formal Planning Committee pre-application briefing meeting. However, under the proposed arrangements Members would be able to make representations to the Chairman of the Planning Committee and Chief Planning Officer to request that the application be subject to pre-committee consideration. Agreeing to the request would not be compulsory.

## Operational Function of Planning Committees

- 1.19 A review of the current rules relating to the operational function of the Planning Committee and Area Planning Committees has highlighted that there is scope to consolidate the rules into a single section dealing with planning committees. Officers are recommending that Meetings Procedure Rules (Appendix C) be amended to include a new section titled Planning Procedure Rules. This new section identifies all constitutional provisions relating to the Planning Committee and Area Planning Committee in one place and clarifies the rules relating to public and Member engagement during these meetings. The Committee are requested to note the following revisions to Meetings Procedure Rules:
- a) Clarification of the procedure for Members to request that an item be determined by a committee ('call-in') rather than being determined by an officer using delegated powers and confirmation that Members are unable to bring Members Items to the Planning Committee and Area Planning Committees (*revised section 6.1 and new section 7.1 of Meeting Procedure Rules which clarifies the procedure for Member call-in of planning applications and clarifies the requirement for Members to provide planning reasons for the call-in*)
  - b) Clarification of the procedure to be followed at meetings (*new section 7.2 of Meeting Procedure Rules which clarifies for Members, the public and officers the order of procedure to be followed at the meeting*)
  - c) Introduces new rules to clarify the management of the addendum and additional information which may be circulated to committee members and be a material consideration in decision-making (*new section 7.3 of Meeting Procedure Rules which clarifies the responsibilities of the parties involved in the planning process in relation to additional supplementary information introduced after the publication of the agenda*)
  - d) Inclusion of rules relating to public participation at planning committees included in Planning Procedure Rules to improve clarify for members of the public wishing to make representations (*extract from Public Participation and Engagement Rules and insert into a new section 7.4 in Meetings Procedure Rules*)
  - e) Clarification of the procedure for determining planning applications (*new sections 7.18 – 7.21 of Meeting Procedure Rules*)
- 1.20 In addition to improving the operational functions of planning committees, it is recommended that a restriction be placed on allowing members of the public having to ask public questions and make comments at Planning Committee and Area Planning Committee meetings, except when planning policy matters are being considered at the main Planning Committee when public questions and comments will be permitted (on planning policy matters only). If the council allow the practice of public comments and questions on planning applications to continue, there is a risk that the committee chairman or officers

may in their written responses to questions or verbal responses to supplementary questions produce a situation where the committee would be taking into account:

- matters that are not material planning considerations which have been given too much prominence in the question and answer session; or
- perceived inconsistencies between what is in the committee report and the verbal responses to public questions being given by the committee chairman which could give rise to a decision being challenged.

- 1.21 Planning Officers have reviewed the functions of the Planning Committee and Area Planning Committee to ensure that they are clear and concise. Revised wording is recommended in Responsibility for Functions and Responsibility for Functions, Annex A (Terms of Reference of Committees, Sub-Committees and Partnership Boards) (*See Appendices A and B*)
- 1.22 The Members Planning Code of Practice has been amended using advice in the Local Government Association's revised guidance note on good planning practice for Members and officers dealing with planning matters – Probity in Planning for Councillors and Officers (November 2013).
- 1.23 The current Code follows the Local Government Association's (LGA) model code produced in 2009. There have been a number of changes to the legislation (e.g. Localism Act 2011) and the rules that sit behind the Code. The LGA therefore issued a new model code in 2013 and the provisions of the new code have been included in the Code.
- 1.24 The Committee are requested to note that this amended code now includes guidance that relating to the pre-application process while addressing the above.
- 1.25 The amended document is attached at Appendix E.

## **2. REASONS FOR RECOMMENDATIONS**

- 2.1 The Constitution, Ethics and Probity Committee are required under their terms of reference to proactively review and keep under review all aspects of the Constitution. These proposals are recommended to improve the operation of planning committees to ensure that process and procedures are clear for Members, officers and the public thereby contributing to the smooth running of the Council.

## **3. ALTERNATIVE OPTIONS CONSIDERED**

- 3.1 Do nothing. The Council could retain current arrangements and not consider strategic developments at the pre-application stage. To encourage high quality developments that enhance Barnet this option is not recommended. In

addition, the current rules relating to the procedure at meetings and public participation could be retained. This is not recommended as the current rules are unclear and can give rise to confusion regarding the procedure to be followed at meetings.

- 3.2 A standalone committee or sub-committee could be established to consider pre-application proposals. Such an approach would ensure a delineation between the Strategic Planning Pre-Application Process (non-decision making) and the discharge of quasi-judicial functions (i.e. determining planning applications and other statutory matters relating to planning as detailed in the Planning Committee's terms of reference). During the trial period the establishment a standalone committee or sub-committee is not recommended as it is currently unclear how many pre-application items may come before the Planning Committee. To ensure that there is separation between the two functions of the Planning Committee, it is proposed that the agenda be divided to ensure a separation between the (pre-application) and formal elements of a meeting.
- 3.3 The Council could opt for a less formal pre-application process. This could involve informal meetings to which Members of the Planning Committee and Ward Members would be invited to give their views on proposals. These would not be linked to formal decision-making committees in any way and could operate as a drop in session that was also open to members of the public. The disadvantage of such a process would be the potential lack of public transparency of such an informal process.

#### **4. POST DECISION IMPLEMENTATION**

- 4.1 To facilitate the presentation of pre-application presentations at Planning Committee meetings it is proposed that the agenda format, meeting procedure and report template as set out in Appendix F be agreed.
- 4.2 Subject to this Committee's consideration and approval of the changes, officers will submit the constitutional changes to Full Council for approval.
- 4.3 A proposed timetable for post decision implementation is detailed in section 1.12.

#### **5 IMPLICATIONS OF DECISION**

##### **5.1 Corporate Priorities and Performance**

- 5.1.1 Barnet London Borough Council is responsible for ensuring that its business is conducted in accordance with the law and proper standards, and that public money is safeguarded, properly accounted for, and used economically, efficiently and effectively. By keeping the Constitution under review it ensures that the framework in which the Council is governed supports the delivery of corporate priorities and performance.



## 5.2 Resources (Finance & Value for Money, Procurement, Staffing, IT, Property, Sustainability)

- 5.2.1 Pre-application consideration of strategic / strategic planning applications is not a statutory service and is therefore a discretionary service which the council are able to charge for. Legislation requires that any charges are be limited to cost recovery. Sections 5.4.4 to 5.4.8 below detail the legal position in relation to charging for discretionary services.
- 5.2.2 When the new arrangements are initially implemented, it is recommended that the pre-application consideration of strategic planning applications takes place at existing scheduled meeting of the Planning Committee. To accommodate the pre-application process, it is proposed only one pre-application item per meeting be considered. The start time of the Planning Committee would be amended to start at 6.00pm thereby leaving sufficient time to consider the pre-application alongside other statutory business required to be determined by the committee. As no additional meetings will be required, the pre-application process can be accommodated within existing resources (Planning and Governance) dedicated to supporting planning committees. HB Public Law charge an hourly rate for committee work and it is expected that the number of hours required to support pre-applications will increase the number of hours required. An additional costs associated with the initial trial period will be recovered from Planning.
- 5.2.3 Following the initial implementation period, officers will have an understanding of the anticipated demand from developers for the service. If there is substantial interest there will be a requirement to increase the number of Planning Committee meetings. Based on the experience in other London boroughs, officers estimate that an additional five meetings of the Planning Committee may be required. Outline financial implications, expressed on a per-additional meeting basis, are as detailed below. These are indicative implications for the costs of a whole meeting, to give Members a fell for the costs, and therefore charges, involved:

### HB Public Law –

Legal officer support at approximately 8 hours per committee meeting (including pre-work (reading agendas, queries, etc.)), attendance at committee meetings (approximately 2 hours travel time, plus 3 hours attendance at call-overs and committee meetings) and follow-ups (review minutes and letters to developers)), plus travel costs. The 2016/17 hourly rate payable to HB Public Law is £59.50 = £476.00 for each additional meeting. There is currently no budget provision for this.

### Governance Service –

Governance Officer support at approximately 8 hours per committee (including pre-work (liaison with Planning, agenda publication, print and despatch), attendance at committee (meeting set-up, attendance at call-overs, liaison with the public, taking minutes and providing advice, etc.) and follow-ups (drafting minutes, etc.) An average hourly rate for a Governance Officer is £36.35 (range from £32.17 per hour to £40.53 per hour) = £290.80 An average Planning Committee agenda costs £337 to print

Total cost = £627.80 for each additional meeting. There is currently no budget provision for this.

Planning –

Planning officer support at case officer and senior officer level at approximately 8 hours each per committee (including preparation and vetting of reports, attendance and provision of advice at Committee) and follow-ups (contributing to minutes, etc). A joint average hourly rate for a planning case officer in the Strategic Planning Team and the rate for the Head of Strategic Planning as senior officer is approximately £120 per hour.

Total cost = £960

If additional meetings are required to accommodate the pre-application process the total cost of officer support is estimated to be £2063.90. Costs associated with providing the service which will be charged to the applicant / developer.

5.2.4 Any additional fees and charges would require approval by the Policy & Resources Committee and would be on cost recovery basis.

### 5.3 Social Value

5.3.1 Not applicable for this report.

### 5.4 Legal and Constitutional References

5.4.1 Council's Constitution, Responsibilities for Functions, Annex A – the Constitution, Ethics and Probity Committee terms of reference includes responsibility "proactively to review and keep under review all aspects of the Council's Constitution so as to ensure that it remains current and fit for purpose, and to make recommendations thereon to the Council".

5.4.2 The current Members Planning Code of Practice follows the Local Government Association's (LGA) model code produced in 2009. There have been a number of changes to the legislation (e.g. Localism Act 2011) and the rules that sit behind the Code. The LGA therefore issued a new model code in 2013 (<http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>).

5.4.3 The Town and Country Planning Act 1990 provides the legal framework under which local authorities determine planning applications (<http://www.legislation.gov.uk/ukpga/1990/8/contents>)

5.4.4 Local authorities have a variety of powers to charge for specific statutory services set out in statute. The Local Government Act 2003 also provides a power to trade and a power to charge for discretionary services, the latter on a costs recovery basis. Discretionary services are those that a local authority is permitted to provide under statute, but is not obliged to do so. The power to charge for discretionary services is not available to local authorities if there is a statutory duty to provide the service or if there is a specific power to charge for it or if there is a prohibition on charging.

- 5.4.5 Additionally the Localism Act 2011 provides local authorities with a general power of competence that confers on them the power to charge for services but again subject to conditions/limitations similar to those noted above.
- 5.4.6 Where authorities have a duty to provide a statutory service free of charge to a certain standard, no charge can be made for delivery to that standard. However, delivery beyond that point may constitute a discretionary service for which a charge could be made.
- 5.4.7 There is a variety of legislation permitting charging for different services, some which set prescribed fees and charges (or the range of charges for a given service), and others which allow discretion based on costs of providing the service.
- 5.4.8 The cost of pre-application advice or services are not prescribed by legislation and the council has discretion to charge for this service under the Local Government Act 2003, but this must be limited to cost recovery.
- 5.4.9 The definition of strategic / strategic applications is as follows and is set out in the revised Responsibility for Functions, Annex A appended to this report:
- “To determine Applications for Planning Permission made under the Town and Country Planning Act 1990 where the recommendation is for approval and the development:
- a. is within the categories which must be referred to the Mayor of London under the London Mayor Order;
  - b. does not accord with the provisions of the Development Plan and, in the opinion of the Chief Planning Officer, constitutes a significant departure; or
  - c. is by or on behalf of the Council and, in the opinion of the relevant Senior Planning Officer, it is a significant development.”
  - d. Development affecting a definitive footpath or definitive right of way
  - e. Gypsy /traveller site
- 5.4.10 The legal definition of a strategic application which must be referred to the Mayor of London (as per 5.4.9 a. above) is set out in the Town and Country Planning (Mayor of London) Order 2008 and includes the following:
- development of 150 residential units or more
  - development over 30 metres in height (outside the City of London)
  - major infrastructure such as waste development with a throughput of more than 50,000 tonnes per annum of waste, a railway station, bus or coach station
  - development likely to prejudice the use of a playing field of more than 2 hectares of land
  - development affecting or proposing a building of more than 1000 sq metres in the Green Belt or Metropolitan Open Land
  - Non-residential development providing more than 200 car parking spaces

## 5.5 Risk Management

- 5.5.1 The process of managing changes to the Constitution through the Constitution, Ethics and Probity Committee ensures that the proposals are developed through Member participation and consideration.
- 5.5.2 As detailed in Section 1.15, there is a risk that Members who participate in pre-application discussions could be considered to have pre-determined a whole application and therefore not be able to participate in the determination of the application or give rise to a risk that a decision could be open to challenge. This risk will be mitigated by amending the Members Planning Code of Conduct to make explicit reference to pre-application discussions and delivering a detailed and comprehensive training programme for Members participating in pre-application meetings. This will be supported by the professional advice of Planning, Legal and Governance officers before, during and after pre-application meetings.
- 5.5.3 Section 1.19 details the risks inherent in the current Public Participation and Engagement Rules and details proposals to mitigate these risks.

## 5.6 Equalities and Diversity

- 5.5.1 The decision making processes of the Council, as enshrined within the Constitution, need to be transparent and accessible to all sectors of the community.

### Equalities

- 5.5.2 The 2010 Equality Act outlines the provisions of the Public Sector Equality Duty which requires public authorities to have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
  - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
  - foster good relations between persons who share a relevant protected characteristic and persons who do not share it
- 5.5.3 The relevant protected characteristics are age, race, disability, gender reassignment, pregnancy and maternity, religion or belief, sex and sexual orientation. The duty also covers marriage and civil partnership, but to a limited extent.
- 5.5.4 The broad purpose of this duty is to integrate considerations of equality in to day to day business and keep them under review in decision making and the design delivery of services.
- 5.5.5 The outcomes and impact of these changes will be monitored and measured against current information to ensure that different groups are not adversely

affected, as well as being compared against similar arrangements in other boroughs.

- 5.5.6 It is anticipated that pre-application consideration of strategic planning applications will ensure that the council can provide guidance on equalities issues prior to formal submission of planning applications. As such, this will ensure that equalities considerations are more embedded in formal decision-making than would have otherwise been the case.

### Human Rights

- 5.5.7 The Human Rights Act 1998 (“the Act”) incorporated into the UK domestic law the European Convention for the Protection of Human Rights and Fundamental Freedoms (“the Convention”). Section 6 of the Act makes it unlawful for a public authority to act in a manner which is incompatible with a Convention right.
- 5.5.8 Article 6 of the Convention provides that everyone has the right to an impartial public hearing although, in limited circumstances, the press and public may be excluded from all or part of a hearing in the interest of morals, public order or national security. The Courts have recognised that regard must be had to the fair balance which has to be struck between the competing interests of those whose rights are affected and the community as a whole.
- 5.5.9 Engaging the Council Members, developers and other stakeholders in the pre-application planning process by way of a public meeting that is open to anyone to attend is fully compliant with the Human Rights legislation.

## **5.7 Consultation and Engagement**

- 5.7.1 Consultation has taken place with the Chairman of the Planning Committee, Chairman of the Constitution, Ethics & Probity Committee and Leader of the Labour Group on the proposals. The Chairman of the Planning Committee has consulted with the administration group on the approach. Proposals will be circulated to members of the Planning Committee and members of the three Area Planning Committees. Any comments received will be reported to the Constitution, Ethics & Probity Committee for consideration.
- 5.7.2 Re Strategic Planning have held informal discussions regarding the proposals with strategic developers and responses have been positive. Officers consider that this is not surprising given that this practice is becoming increasingly common in London boroughs.

## **5.8 Insight**

- 5.8.1 None.

## 6 BACKGROUND PAPERS

- 6.1 Local Government Association, 24 January 2014, Ten commitments for effective pre-application engagement: [http://www.local.gov.uk/publications/-/journal\\_content/56/10180/5862911/PUBLICATION#sthash.6Bg1m5NA.dpuf](http://www.local.gov.uk/publications/-/journal_content/56/10180/5862911/PUBLICATION#sthash.6Bg1m5NA.dpuf)
- 6.2 London First, September 2011, Connecting Councillors with Strategic Planning Applications: [http://londonfirst.co.uk/wp-content/uploads/2012/08/DC\\_Councillor\\_Guidance\\_doc\\_final\\_Sept\\_20111.pdf](http://londonfirst.co.uk/wp-content/uploads/2012/08/DC_Councillor_Guidance_doc_final_Sept_20111.pdf)