

## Schedule of Responses to the Pre-submission draft Statement of Community Involvement

Ref	SCI section / paragraph	Contact Name/ Organisation	Comment	Council response
Bodies consulted under Regulation 25 (Statutory bodies)				
01/001	General	The Highways Agency	They have commented that: "As a 'specific consultation body' we would expect to be consulted on any Local Development Documents that may have an impact on the motorway and all purpose truck road network (section 25 (1) of the Regulations). In particular we would expect to be consulted on all Development Plan Documents. We welcome the opportunity to be involved at an early stage in discussions; where a meeting s considered appropriate, we would prefer a one to one meeting on issues relating to the trunk road network".	Noted, and will react where appropriate.
02/002	General	London Borough of Waltham Forest	The Authority "strongly agreed" or "agreed" with all of the statements (all of which are worded positively) contained in Section 1 of the consultation form which asks consultees to tell us what they think of the Draft, and they had no additional comments to make.	Noted.
03/003	Section 4 and Paragraph 4.4, Page 11 and Table 5 Page 12	London Borough of Enfield.	You may wish to consider setting out how the Council will involve the community on all Local Development Plan Document (LDDs), including LDDs that the Council may produce in the future. This will ensure that revisions to the LDS will not trigger a review of the SCI. Appropriate methods of community involvement for AAPs should be incorporated into Haringey's SCI at the points listed to the left under SCI Section/paragraph. It is suggested that Haringey take the approach as set out in Table 4.2 of Enfield's SCI which covers Area Action Plans	Noted. At the time of writing the Draft SCI Haringey didn't have any Area Action Plans. Since that time they have begun work on the Central Leaside Area Action Pan (a joint project with Enfield). It would clearly make sense to provide appropriate methods of community involvement for AAPs into the SCI and this will be done at the said points.
Bodies consulted under Regulation 26				
04/004	Tests of Soundness bullet 4	The Theatres Trust – Rose Freeman	The statement does not identify how the community and other bodies can be involved in a timely and accessible manner – it is usual to have a paragraph either at 3.12 or within a sub-heading of Appendix 5 to show that you have prepared and maintained a database for LDF consultations to which any persons or organisation can ask for their details to be added at any time. This paragraph would also contain details for people or organisations to apply to join the LDF database or to have their details amended. The wording would be something like: " <b>Haringey's LDF consultation database</b> – the London Borough of Haringey has a	Agree – amended to reflect these comments.

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			database of individuals and organisations who wish to be involved including local businesses, residents associations, voluntary groups, government bodies and individuals. If you would like to join the LDF consultation database and be kept up-to-date on the new development plan for Haringey please contact us using the details below. Please also contact us if you are already on the LDF consultation database and want to change your details or be removed".	
04/005	General	The Theatres trust – Rose Freeman	Please add our details to the LDF database: Rose Freeman The Theatres Trust 22 Charing Cross Road London WC2H OQL Tel: 020 78368591 Fax: 020 78363302	Noted and details added.
05/006	Para 3.16	Berkeley Group – Alison Dowsett	We consider that the following should be added to the end of paragraph 3.16 so that it reads: The choice of appropriate mechanism will, however, be the responsibility of the developer".	Agree but to read: "The choice of appropriate mechanism will, however, be at the discretion of the developer".
06/007	Para 6.9	Mr Geoffrey Wearmouth (resident)	Most community facilities such as children's homes and care homes are determined by Certificates of Lawfulness, and the SCI confirms that the community will be excluded from such applications. This could be replaced by the text: "where there is a choice between the types of application used (full planning permission or Certificate of Lawfulness) the Council will use the method that involves the community in the widest consultation". Certificates of lawfulness are increasingly used for extensions, roof extensions etc and this has lead to some dangerous work being carried out and collapsed buildings where neighbours have been excluded from notification.	In the case of a Certificate of Proposed Use, the applicant is seeking confirmation that planning permission is not required for the work proposed. To consult on these applications could lead to confusion with residents when it will often be the case that planning permission is not required (this may not, of course, preclude the need to obtain Building Regulations). There are instances where children's homes and care homes do not require planning permission and it would be confusing for residents if the Council were to invite comment on uses where ultimately they have no control in planning terms. In the event that the Certificate application determines that planning permission is required, the Council will then seek to consult

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				with all (potentially) affected residents. With regard to a Certificate of Lawfulness for an Existing Use, the Council will look at each case on its merits but may, for example, chose to consult when they deem that local knowledge may be able to establish if a use or a building has been there for a period of time that would prevent the Council from taking any enforcement action to stop the use or remove the building.
06/008	Appendix 9	Mr Geoffrey Wearmouth	Certificates of lawfulness are increasingly used for extensions, roof extensions etc and this has lead to some dangerous work being carried out and collapsed buildings where neighbours have been excluded from notification. Appendix 9 should state that the named parties will be consulted in all instances. – “Consultation policy – neighbour notification *note these criteria will be applied in all applications”.	See comments at 06/007 above.
06/009	Table 10	Mr Geoffrey Wearmouth	The row on PASC should contain the text: “All requests from the PASC to have applications considered by committee in public will be honoured”.	Requests from PASC will be considered if they fall outside the guidelines for referral to the planning committee. However, such requests will only be agreed where there is a special case or it is in the public interest to do so. All requests will be subject to the approval of the Assistant Director.
07/010	General	Amanda Green (resident)	Not enough effort is being made in the poorer parts of the borough to involve people in decision making, and so decisions are made without their input. To engage people you need to go to schools and libraries and doctors’ surgeries, as well as having public and face to face meetings. Also, private landlords are not taking responsibility for their properties and people who live alongside these properties have to put up with the mess.	The SCI is seeking to engage the community on a wider level, and this will include those groups in society which are currently not engaged. We will be looking at ways of ensuring that as wide as possible a variety of people take part in the consultation process.
08/011	General	Friends of the Earth (Tottenham and Wood Green)	The critical issue for local community groups and interested persons is often getting information in a timely and efficient way, and getting feedback from any responses we do make.	As part of the SCI we will look at and aim to improve, where appropriate, procedures in terms of feedback to the community and interested persons.
08/012	Section 5 Planning Policy	Friends of the Earth (Tottenham and Wood Green)	1. How do people get onto the planning policy database? This needs to be as transparent as possible.	At present you can request to be put on by the Council, but in the future, with the introduction of a new software package, you will be able to

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	Development		<p>2. Can emails be used instead of letters to inform people already on the database?</p> <p>3. Feedback is very important and helps to motivate groups to be involved.</p> <p>4. Typos at 5.16 – should read “alongside government and regional...”, and at 5.18 – should read “Council will where appropriate...”</p>	<p>log on to a data base and submit your user details, and/or request to be put on manually.</p> <p>As part of the new software package this will be able to be done.</p> <p>Noted (see also comment 011 above).</p> <p>Noted and corrected.</p>
08/013	Section 6 Planning Applications	Friends of the Earth (Tottenham and Wood Green)	This refers to Council officers commenting on lists of Consultees produced by developers, but how does the Council ensure that it maintains a good up-to-date list and how do individuals and groups find out if they are on the list, or get themselves onto it?	We are constantly looking at ways of improving and refining how we maintain an up-to-date list. Ultimately some of this will depend on groups and individuals advising the Council that they wish to be consulted or informed, but also we, as the Council, will take responsibility to seek to improve and refine the present system so that it meets the needs of its users. We do try to ensure that this list is up-to-date by periodic mail shots to see if the groups on the list are still active. The Council’s DC Support Team Leader oversees this list and should be contacted by any new groups/people wishing to go on the list.
08/014	Table 10 – Planning Application Process - Direct Neighbour notification letters	Friends of the Earth (Tottenham and Wood Green)	It should be possible for groups and individuals to ask to be notified automatically of any application in their area.	Agree – the Council’s DC Support Team is looking at ways of improving notification of neighbours. Unfortunately the current system does not allow us to “automatically” notify particular groups or individuals when a planning application is received – this is a manual process. In addition and as a matter of course, we will make an assessment of the likely potential impact of the application and

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				notify those residents that we think will be affected by the development. The only automatic notification process that DC currently provides is to add a group of person to the distribution list of the weekly list of planning applications received by the Council – this will include all application received, not just those pertaining to a particular geographical area.
08/015	Table 10 - website	Friends of the Earth (Tottenham and Wood Green)	It is useful to be able to access applications on the web but they are huge documents and listed only by numbers. It would be much easier if they were given clear names such as "site plan" etc	Agree – the Council's DC Support Team Leader is looking at ways of improving this. We would like to have this facility and are currently in negotiations with our IT suppliers (they provide the public access module of our system) to create and introduce this facility.
08/016	Table 10 – internal council departments	Friends of the Earth (Tottenham and Wood Green)	Appendix 11 mentions consultation with Parks for developments on open space or within parks, but there should also be consultation with the Council's Nature Conservation Officer on any development which could have an impact on wildlife.	The Council's Conservation Officer is part of the Parks Department. In appropriate instances, and where an application has been referred to Parks for their comments, it will be passed to the Conservation Officer to look at any impact upon flora and fauna and pass comment.
08/017	Table 10 – Amenity groups	Friends of the Earth (Tottenham and Wood Green)	While this section looks good, in reality groups are not always notified of the category of development which they want to know about, and the latter should be made possible. Groups should also be notified when the decision is taken and when an officer's report will be available on the web.	If we are clear on the types of application that amenity groups are interested we will seek to ensure that a system is in place that means they are notified of them. The DC Support Team Leader will look at this. See also 08/013. We maintain a list of consultee groups which includes the type and site of applications a particular group is interested in. If this information is not correct, the group can contact the DC Support Team Leader to amend the details. We always aim to err on the side of caution and over consult as opposed to under consult. It is our usual practice that if a person or group comment on an application we notify them of any decision that is made on the application.

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08/018	Table 10 – re-consultation	Friends of the Earth (Tottenham and Wood Green)	This should be done routinely using email.	Changes to the application are normally consulted on where they are materially different to those submitted. Improvements to smaller household schemes are not always consulted on as they have sometimes been requested by the neighbour. Over the next year we will be looking at how we notify particular groups that applications have been received and this will include increasing the use of electronic notification. There are a number of technical issues we need to try and resolve in taking this forward.
08/019	Table 10 - Negotiations with the applicant	Friends of the Earth (Tottenham and Wood Green)	While there is some place for confidential discussions, interested parties should be notified that such discussions are taking place, or at least of any changes to an application that result.	Pre-application discussion is confidential. Discussions can only be revealed with the approval of the applicant or agent.
08/020	Table 10 PASC	Friends of the Earth (Tottenham and Wood Green)	Is information about attending PASC meetings available online?	Yes, details on attendance can be viewed at <a href="http://harinet.haringey.gov.uk/index/housing_and_planning/planning-mainpage.htm#attached_files">http://harinet.haringey.gov.uk/index/housing_and_planning/planning-mainpage.htm#attached_files</a>
08/021	Table 10 – Decision feedback	Friends of the Earth (Tottenham and Wood Green)	Again this should be given routinely and by email in most cases, and there should be reference by the Committee on how it responded to key objections if it agreed to grant planning permission.	All decision notices give reasons for approval and planning reports provide more detail. Decision notices are sent out to respondents and this can be done by email. We are continuing to look into feedback on decisions as we are aware that this is an area where the public and others want information.
08/022	Additional comments	Friends of the Earth (Tottenham and Wood Green)	<ul style="list-style-type: none"> <li>Planning jargon is hard for lay people to understand and so there should be commitment for officers to meet face to face and answer questions and explain issues, and this should include a readiness to attend evening meetings.</li> </ul>	We seek to meet face to face wherever possible. If the public or others feel that this is too infrequently we undertake to look at this area and seek to increase face to face meetings where appropriate. On major schemes we have evening meetings on the form of the Development Control Forum. Officers are aware of the problems with jargon and there is a commitment to make reports clear and in plain English.

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			<ul style="list-style-type: none"> <li data-bbox="801 308 1451 416">• Photocopying is expensive – information commissioners have ruled that photocopying costs should be waived or should be no more than 10p per page at most (not £5 for the first sheet as Haringey sometimes charge).</li>   <li data-bbox="801 938 1469 1046">• Objections and comments are often not followed up by the LPA. All policy should be monitored and this should include “mystery shopping” and surveying groups who do regularly respond to consultations.</li> </ul>	<p data-bbox="1507 308 1995 882">The DC Support Team Leader will be reviewing photocopying charges in light of the Information Commissioner’s recent advice. We do now can and make available via the website the majority of documents connected with applications where they can be viewed, downloaded and re-produced free of charge. This will cover all recent applications and all those going forward with a recommendation. The copying charges that we levy will mostly relate to historic applications and these are most often of interest for commercial reasons. We need to ensure that we have a fair system of charges with regard to viewing and reproducing documents where they are for consultation purposes – which we have done by making information freely available via the website – whilst ensuring that information provided for commercial purposes properly reflects the costs of storage and staff time involved.</p> <p data-bbox="1507 930 2007 1118">We do monitor all policy through the Annual Monitoring Report. We will look at whether mystery shopping and surveying groups would add positively to this process and react accordingly. The Council does carry out surveys of its user groups to gain a satisfaction rating.</p>
09/023	General	British Waterways – Anna Chapman	British Waterways have taken the opportunity to emphasise the “wide and varied role of British Waterways and to highlight areas where we feel consultation with British Waterways would be appropriate”. An extract from “Waterways and Development Plans” has been included which highlights the diverse range of policy objectives and wider sustainable development and social inclusion agendas that inland waterways can contribute to.	Noted.

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09/024	Table 10 - Planning applications	British Waterways – Anna Chapman	Table 10 acknowledges the Council’s requirement to consult statutory consultees but British Waterways have reminded us of their statutory designation in accordance with para 4a of Article 10(1) of the Town & Country Planning (General Development Procedure) Order 1995, as amended in 1997. British Waterways also encourages pre-application discussions on proposals which would fall within this designation.	Noted.
10/025	3.13 Table 3 – Community Involvement Principles	Muswell Hill and Fortis Green Association – Mrs at Bloomfield	<ul style="list-style-type: none"> <li>• Access to information - Second sentence should read “Site notices will be displayed on all publicly accessible boundaries of the site” and last sentence should be deleted.</li> <li>• Reducing barriers – the last sentence should have the following wording added to it: “...magazine and local commercial and free newspapers”.</li> </ul>	<p>We are currently reviewing the format and use of site notices. Your comments will be considered as part of this review.</p> <p>Haringey People is the one document that goes to every household. This information will also be available on the web.</p>
10/026	5.9 Table 7 – Development Plan making stages	Muswell Hill and Fortis Green Association – Mrs Pat Bloomfield	<ul style="list-style-type: none"> <li>• Stage 2 Documents available delete “the main libraries” and substitute “all libraries”.</li> <li>• Stage 4 Documents available – in the second sentence after “planning office” add “and libraries”.</li> </ul>	<p>Agreed.</p> <p>Agreed.</p>
10/027	6.6 Table 10 – Planning application process	Muswell Hill and Fortis Green Association – Mrs Pat Bloomfield	<ul style="list-style-type: none"> <li>• Advertising and consultation weekly planning list – in the first sentence after “interested parties” add “and libraries, with copies of drawings for applications of general interest e.g. change of use, shop fronts and large schemes”.</li> <li>• Re-consultation – delete the second sentence and add “the Council will re-consult except where changes are insignificant.</li> </ul>	<p>All drawings and the weekly list of planning applications are available in all libraries via the internet.</p> <p>See comment 028 below.</p>
10/028	6.9	Muswell Hill and Fortis Green Association – Mrs Pat Bloomfield	Alter to read “Although the Council .....types of application, it will do so”	Noted. There are certain applications where is not prudent or desirable to consult because either the application is seeking to establish whether planning permission is required (and if it is, local residents will be consulted at that stage) or where the works are internal and therefore not visible. In all applications for full or outline planning permission, listed building consent, or advertisement consent, and where there is a potential impact on the area, the

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				Council are committed to consultation.
10/029	Appendix 8 Appeals column	Muswell Hill and Fortis Green Association – Mrs Pat Bloomfield	<ul style="list-style-type: none"> <li>• Post site notice – change to “yes”</li> <li>• Advert in local paper – Change to “yes”</li> <li>• &amp; or press release – Change to “yes”</li> </ul>	We will certainly give consideration to placing a site notice to indicate an appeal – we will do this as part of our review of site notices which is currently being carried out. We always re-consult at appeal to all those households and groups who made representations at the time of the original planning application.
10/030	Appendix 9	Muswell Hill and Fortis Green Association – Mrs Pat Bloomfield	<ul style="list-style-type: none"> <li>• Consultation policy General Household and Residential - Notification should not be limited to a specific number of properties, but should be based on those who are directly, and, where appropriate indirectly affected.</li> <li>• Change of use – as above</li> </ul>	The Council will seek to ensure that all properties that might be directly or indirectly affected by the proposal are consulted. The current system does allow for flexibility but it is important that minimum standards are set.  Noted.
10/031	Appendix 10 – statutory publicity – press adverts publicity required	Muswell Hill and Fortis Green Association – Mrs Pat Bloomfield	“Advert in newspaper” must include local commercial press and free newspapers. Adverts in Haringey people are insufficient and do not reach enough people to achieve their object.	We will review our advertisements in the local press. We do currently advertise in two local papers (the Tottenham and Wood Green Independent and the Muswell Hill and Crouch End Times). There would be a financial implication for additional adverts in the local press. We would need to make an assessment of the most effective means of consultation.
11/032	Page 2 1.11 Question	Councillor John Bevan	Is it correct to state that the SCI will be submitted to GOL and at the same time go out to public and statutory consultation?	Yes. We hand the Submission Draft SCI to GOL and then Haringey consult for another six week period. Any representations will then be considered by the Inspectorate and not by the Council.
11/033	Page 8 penultimate paragraph/ question	Councillor John Bevan	Have the site notices been designed yet, if not when, and will colour other than white paper be used?	We are in the process of redesigning the site notice and looking at a range of colours to use.
11/034	Page 10/3.16	Councillor John Bevan	The words “which will be submitted to meaningful audit” to be added.	We will add the line “The applicants will be encouraged to submit a Consultation Statement with larger applications to identify the consultation undertaken and its results,

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				together with how this has been incorporated into the submitted planning application".
11/035	Page 11 – Haringey’s Local Development Framework.	Councillor John Bevan	The whole page needs to be redesigned as it is difficult to understand.	We have redesigned the page to try to make it easier to understand.
11/036	Page 18/6.1	Councillor John Bevan	“Change of use” needs to be added.	Changes of use will fall under major or minor (and occasionally household) and so are already included.
11/037	Page 21 Table 10 – Direct Neighbour notification.	Councillor John Bevan	Three basic letters are sent, but only two are listed?	Noted, typo error and this has been changed to “two”.
11/038	Page 26 table 10	Councillor John Bevan	Complete information on how to appeal needs to be added	Noted and details added.
11/039	Page 32	Councillor John Bevan	Information re Planning Aid needs to be added and this would be a prominent place for it. Perhaps Planning Aid should design a side of A4 and we can add it here so that the public know who they are and what they do.	Noted and details added.
12/040	Various	Councillor Robert Gorrie	The document does not specify or emphasis the ward councillor through the detail of the document. E.g. not mentioned in three pages of consultation stakeholders in Appendix 5, and not mentioned as one of the “Community Involvement Methods” or identified as one of the contact points for pre-application community involvement or major schemes. There should be more overt emphasis on ward Councillors and more clarity on their role.	We have revised the document to raise the profile and role of Councillors. The Council’s constitution sets out the role of Councillors. See also para 7.8 of the SCI which sets out the role of councillors.
12/041	5.18	Councillor Robert Gorrie	“h” is missing from “where” in “the Council will where appropriate”	Noted and corrected.
12/042	Table 4	Councillor Robert Gorrie	Harinet is referred to as Hairnet	Noted and corrected.
13/043	General	Natural England	Document appears “sound and appropriate” and there are no further formal representations.	Noted.
14/044	General	Environment Agency	No comments to make.	Noted.

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15/045	Para 3.11	Lee Valley Regional Park Authority (LVRPA)	The Authority should be included as a key stakeholder either as a 'general consultation body' or as an 'other consultee'. This would enable early liaison and discussion on issues and options as well as early involvement with the draft DPDs which, given the complex spatial issues arising from the Upper Lee Valley Opportunity Area and regeneration scenarios, would be of benefit to all parties.	Noted and added under General.
15/046	Para 6.3 and Table 10	Lee Valley Regional Park Authority (LVRPA)	The Regional Park Authority is a statutory consultee on all planning applications that may affect the Park. It is not clear from Table 10 at what stage the Authority would be consulted and this needs to be clarified. Can it also be confirmed whether or not the Authority would be included within the Statutory Consultee category on page 22 which states that "the Council will consult with any statutory body required in accordance with any Act or Regulation".	As a statutory consultee, the LPA will consult with the LVRPA at the planning application stage. However, the Council will make every effort to ensure that applicants and developers consult with LVRPA at the earliest possible stage as good planning practice. It must be borne in mind, however that they are under no statutory obligation to do so. It is confirmed that the LVRPA would be included in the Statutory Consultee category on page 22 of the Draft SCI.
16/047	Question 5 – Community Involvement	Muswell Hill and Highgate Pensioners Action Group (Mrs Pamela Jefferys and Janet Shapiro)	The document ignores a common reason for the conflict in planning i.e. commercial speculation having an advantage over a local authority that is short of resources. Community involvement can highlight issues and the planning process should minimise the extent to which high land values put public amenity at risk. Such constraints should be clearly stated at an early stage. The existing process for consultation should be explained, and the reason for making changes.	The Council's aim at all times is to protect public amenity but it must operate within the relevant constraints. These constraints will always be made clear at the relevant times or when asked for. We have a booklet entitled Planning Consultation Policy which explains our consultation policy and it is available on our website, or in hard copy on request.
16/048	Question 7 Table 10	Muswell Hill and Highgate Pensioners Action Group (Mrs Pamela Jefferys and Janet Shapiro)	It is not made clear, in relation to retail developments in local high streets, whether local residents can object to the application being a large corporation. Residents may prefer an independent shop for reasons of commercial sustainability.	While residents can object to a large corporation, it is the use and not the user that is relevant in deciding whether or not to grant planning permission.
16/049	Consultees Appendix 5	Muswell Hill and Highgate Pensioners Action Group (Mrs Pamela Jefferys and Janet Shapiro)	Under 'Specific Consultation Bodies' we suggest the list should include the City of London Corporation, who should be consulted on any application adjacent to Highgate Woods	Agree and "other London boroughs added under "other consultees".
16/050	Para 3.13 Access to	Muswell Hill and Highgate Pensioners	Notices are too small in print and in locations that can be difficult to read. There should also be more than one as some of them are torn	Noted. The DC Support Team Leader will look at the size of font and location of site notices

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	Information, Community Involvement Principles, Site Notices	Action Group (Mrs Pamela Jefferys and Janet Shapiro)	down.	and alter them where appropriate e.g. where they are difficult to read. We are currently looking at redesigning the site notice. We will take the comments that you have made on board as part of this redesign.
16/051	Community Involvement. Table 7, Stage 2: Documents available	Muswell Hill and Highgate Pensioners Action Group (Mrs Pamela Jefferys and Janet Shapiro)	For "Main Libraries" substitute "all libraries", especially important for the west of the borough as it is not easy to get to Tottenham from the west.	Agreed.
16/052	Table 10 – direct neighbourhood notification letters (see appendix 9 )	Muswell Hill and Highgate Pensioners Action Group (Mrs Pamela Jefferys and Janet Shapiro)	Where it says "three properties front and back", "rear" or "opposite" we would like to substitute "six properties". We would also like to see more publicity for the need for neighbourhood notification in respect of applications of garages, boundary fences, garden sheds etc. We believe that people are not aware of this and do not apply for planning permission.	Each application is looked at on merits and the minimum requirement for notification is exceeded where appropriate. Table 10 states this. In addition we have made the guidance on permitted development available via the Council's website.
16/053	Appendix 10 – Weekly planning lists	Muswell Hill and Highgate Pensioners Action Group (Mrs Pamela Jefferys and Janet Shapiro)	We would like copies of the weekly planning lists to be in all the libraries.	Noted. We will ensure that they are placed on the web site so that they are in each library and can be printed from there if required.
16/054	General comments	Muswell Hill and Highgate Pensioners Action Group (Mrs Pamela Jefferys and Janet Shapiro)	<ul style="list-style-type: none"> <li>• More publicity is needed on conservation areas as lots of people don't realise that they live in one.</li> <li>• CAACs – these committees include dedicated volunteers, often with a wealth of professional knowledge. They always give good reasons for opposing applications and it is very disheartening when the Council ignores their advice and gives approval.</li> </ul>	<p>The Conservation Team is giving careful consideration as to how they can ensure that those who live in conservation areas are aware of this.</p> <p>Local CAAC's are consulted in an advisory capacity only. Recommendations from officers are based on a balanced assessment of the individual case. The comments of the CAACs are welcomed and are given appropriate weight. In some cases other considerations may, on balance, and taking into account all material considerations, finely outweigh the CAAC's view. Each application has to be assessed on its own planning merits. It is our experience that we have worked closely with all of the CAACS, but there will always be</p>

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			<ul style="list-style-type: none"> <li>• It should be easier to speak at Scrutiny Committee. We should not have to collect signatures for permission to speak to a democratic Council.</li> <li>• We would like more frequent Area Assemblies in easily accessible places. At present the agendas are usually so full that many people are not able to have their say.</li> <li>• Sometimes consultation for unpopular schemes is held in August. The cynics amongst us believe this is deliberate policy because many people will be away on holiday.</li> </ul>	<p>occasions where there is a difference of opinion. Even when there is a difference of opinion, the CAAC's comments are always included in the report and are considered as part of the decision making process.</p> <p>Noted. Your comments have been passed on to the Principle Committee Coordinator.</p> <p>Noted. Your comments have been passed onto the Area Assemblies Coordinator.</p> <p>The Council cannot dictate when applications are submitted. It is unfortunate when unpopular schemes are submitted in at the end of July as it means that consultation inevitably will take place in August. Where possible, the Council will seek to ensure that major or controversial applications are not consulted on in August. In any event, the Council will always accept comments or objections outside of the two week consultation period where possible.</p>
16/055	Clarity of Statement pages 1 – 3	Muswell Hill and Highgate Pensioners Action Group (Mrs Pamela Jefferys and Janet Shapiro)	The document is difficult to read and not many people are likely to respond because of this. It needs a description of what happens now and why it was necessary to change the planning process. The UDP defines the constraints that local planning applications need to satisfy but it is not clear where these constraints will be defined in the new scheme. Paragraph 1.3 page 1 refers to some UDP policies being saved, but what are the set criteria to be met?	The Council have sought to make the document as accessible as possible in terms of its contents. Paragraphs 1.2, 1.3, 1.6 and 1.8 set out the new planning system, why an SCI is required and how the document will be prepared.
16/056	Pages 4-5 Links with other	Muswell Hill and Highgate Pensioners Action Group (Mrs	The statement is commendable. What is being asked? Obviously the principles of consultation are common across all activities.	This section of the SCI sets out how we will seek to engage the community in involvement in planning matters.

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	community involvement	Pamela Jefferys and Janet Shapiro)		
16/057	Community Involvement	Muswell Hill and Highgate Pensioners Action Group (Mrs Pamela Jefferys and Janet Shapiro)	The main problems that will occur are not referred to. High land values attract commercial developers who can afford delays and can fund persuasive publicity for developments. Independent small firms may get squeezed out by high rents and cannot fund publicity. Development of accommodation for public service amenity is at a disadvantage, and also public buildings are being increasingly sold to generate funds. Community involvement will draw attention to such problems, but the planning process should help to lessen these conflicts and make it possible for the necessary amenities to be provided.	It is not possible for local government to intervene in terms of competition on the open market.
16/058	Question 7 Community Involvement in Planning Applications Table 10	Muswell Hill and Highgate Pensioners Action Group (Mrs Pamela Jefferys and Janet Shapiro)	Non residential will include retail units. It is not made clear whether residents can object to a large company developing a retail unit. It can be in the community's interest to prefer independent small enterprises in local high-streets. The community needs to negotiate clear guidelines that frustrate ruthless developers. Stakeholders' responses can be ignored if there are loopholes.	Competition is not an issue in planning terms. We are required to consider the use, and not whether the applicant is a large or a small company.
17/059	General	The Royal Mail	Agree that the SCI sets its purpose out clearly, links to other community involvement initiatives in the Council, is comprehensive in setting out how the Council will involve its diverse communities in planning matters and the principles identified for effective community involvement, that the Council has identified all relevant organisations to involve and consult, that the proposed methods of consultation are suitable for involving groups and the wider community, including those that do not respond to traditional methods of consultation, that the Council has set out the planning application process clearly, that the Council have opened up the pre-application process for planning applications on opportunities for community involvement on major schemes, that the Council identifies sufficient methods of consultation on planning applications and that the applications process for all planning applications provides stakeholders with the opportunity to comment and respond to proposals.	Noted.
18/060	Para 2.4 – Guiding Principles	Cllr Bob Hare	The task will be to institute the guiding principles comprehensively, fairly and efficiently into the task of planning.	Noted. In the interests of good planning this is exactly what we will aim to do.
18/061	3.7 – High	Cllr Bob Hare	"High levels" needs to be clarified with what is appropriate as it is	Agree. It is difficult to clarify "high" so alter text

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	levels of children and young people		meaningless as it stands.	to read "Children and young people".
18/062	3.12 – Table 2	Cllr Bob Hare	While General Consultation Bodies can be assumed to involve CAACs, the latter are indicated by government to have a special role in planning and should be noted specifically.	Agree – add CAACs to the list.
18/063	3.13 Table 3	Cllr Bob Hare	Translation of web pages can be achieved online using a link with a self-explanatory icon to free or charged for (paid by Haringey) service covering all the Haringey Community languages.	Noted, and reference added.
18/064	LDF database	Cllr Bob Hare	The process of being added to this database should be simple and the areas of interest easily indicated so that a consultation can, as far as possible, be done automatically. The database should be easily viewable for checking online (with a password for access to ensure protection).	Noted. The Council is implementing a new software package that will include a consultation database and allow users, (including new users) or consultees to log on and add or amend their details. They will also be able to make representations, view other representations and view Council and other feedback.
18/065	3.14 – Table 4 Community Involvement Methods	Cllr Bob Hare	Information by letter should refer to "all planning applications" and not just "planning applications".	"All applications" are not referred to here as some applications e.g. a certificate to establish whether or not you require planning permission (Certificate of Lawfulness for a Proposed use) is not consulted upon.
18/066	Table 4 Row 6 – Local press briefing	Cllr Bob Hare	Why not advertise all applications in CAs in the local press?	All applications in Conservation Areas are advertised in the local press.
18/067	Table 4 - Row 12	Cllr Bob Hare	CAACS expect to see all policy documents and all applications both in <u>and</u> outside but affecting their CAs.	The Council does consult on all policy documents relating to conservation. The Council undertakes to consult the CAAC on all planning applications within their area. With regard to applications outside the conservation area, the onus is on local groups to check the weekly list of planning applications and ask to see any which are outside the CA but which they feel might reasonably affect the conservation area. These applications are also available to view on line.
18/068	Table 4 –	Cllr Bob Hare	<ul style="list-style-type: none"> <li>All applications should be advertised and notified in good</li> </ul>	The Council seeks to ensure that all

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	general		<p>time;</p> <ul style="list-style-type: none"> <li>We should publish a rationale for choosing consultation methods;</li> <li>How will consultation forums be done? Who carries them out?</li> </ul>	<p>applications are advertised in good time. The public and other interested parties have 14 days from the date of the advertisement to make representations on an application.</p> <p>The rationale is inherent in the document.</p> <p>Any consultation forum will take into account a number of factors including the type of application, the resources of the applicant and the appropriate target audience. They may be carried out by a variety of groups/people including consultants or the Council.</p>
18/069	Para 3.16	Cllr Bob Hare	How will the council prevent developers who are running early community involvement events from unfairly over-whelming opposition? How will the Council guarantee a fair and balanced hearing by those who oppose a development where the Council expects the developer to carry out and “employ a mixture of consultation tools” – how will the council ensure the fairest tools have been used?	This can be a difficult issue - Developers who are running community involvement events are clearly there to promote their application and so the information imparted may not always take a rounded view point. In many instances the Council will be present at these events and will support the community in their quest for full and frank information on a development or proposal. The Council also has its own specialised officers (conservation, highway engineer, arboriculturalist etc) who will independently look at the information provided and come to their own balanced conclusions.
19/070	General	Circle Anglia	<p>The document is thorough and comprehensive in terms of community engagement, but these queries have arisen:</p> <ul style="list-style-type: none"> <li>The Voluntary, Community and Faith ( VCF) sectors are cited as key stakeholders in the process, but will they be able to access planning staff training and consultancy support to help to deliver the community engagement, and will the VCF be able to deliver some training in their role as</li> </ul>	The Council are giving consideration to if and how they can provide training and consultancy support to the VCF to help to deliver the community engagement that we are seeking through the SCI. This is an area which is in

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			<p>experts in community engagement and involvement? Will partners be able to access this training to support the process, maximise participation/involvement and ensure parity of engagement standards?</p> <ul style="list-style-type: none"> <li>• Will partner residents' groups be included as engagement mechanisms? If yes, how will this be delivered/accessed and what role will they play in the process – introduction, awareness raising, monitoring, evaluation or just providing a list of 'recognised' groups?</li> <li>• Will RSLs be included in the list of "general consultation bodies"?</li> <li>• An LDF consultation database is being developed. Would Haringey residents on our Have Your Say Panel be considered as a discrete group for this database to provide another consultation mechanism?</li> <li>• Will partner consultation activities (including resident newsletters/websites) be considered for 'piggybacking' and 'dovetailing' LDF consultation?</li> </ul>	<p>the very early stages of development, and which will inevitably be governed by some constraints, including budgetary ones.</p> <p>Yes they will. Depending on the type of application and the level of involvement that the group want, their role will vary accordingly.</p> <p>Yes. See also further information on 08/013</p> <p>Yes</p> <p>Yes, the Council will explore opportunities for shared consultation exercises where it would avoid consultation fatigue.</p>
20/071	Page 6 Para 3.2	Haringey Federation of Residents Associations (HFRA)	Community involvement should only be encouraged if participants have a belief that their inputs will make a difference. This belief would be strongly bolstered if there was in place a "separation of powers" between those officers involved in policy development and those involved in reporting on applications.	That separation of power already exists between the two in terms of management, although ultimately both work as part of the Local Planning Authority. Further the development plan process is subject to an independent inquiry.
20/072	Page 6 para 3.2 bullet 1 Development of Planning Policy	HFRA	Community involvement in development of planning policy is a problem for three reasons: 1) effort required to obtain and become familiar with extensive documents – the Council has not made this easy in a way that does not trivialise or persuade the audience that they are not being patronised; 2) a belief by residents that the Council has already made up its mind and so response is a futile exercise. 3) A fond belief by residents that outcomes of planning	The SCI seeks to begin the process of breaking down these barriers to effective consultation with the community. In doing so the Council hopes that, over time, these three problem areas will be minimised or even eradicated.

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			policy are beyond their relevant horizon of interest, and thus not relevant to them.	
20/073	Page 6 Para 3.2	HFRA	<p>Community involvement in planning applications is problematic in three main areas: 1) often awareness of applications comes at a late stage and the statutory minimum for nearest neighbour notification is inadequate;</p> <p>2) Where the LBH is the sole developer or one of the partners in large applications should they then promote, and be judge and jury on these kinds of applications? The SCI should explicitly address measures and protocols that give confidence that the LPA is in a position to properly discharge these roles;</p> <p>3) There are no procedures that for example state when departments of the Council should first consult on an application in terms of dealing with applications from its own departments involving listed buildings, conservation area consents and works involving trees.</p> <p>There is also an issue of quality of report - these quality issues range from one of robustness and independence (especially when Council's own), to areas of simple competence in and understanding of the LPA's planning guidance which is very much an issue in smaller applications. This view is common amongst objecting organisations, and some Appeal Inspectors have reinforced it.</p>	<p>The Council make every effort to consult with local residents and groups as soon as is practicably possible. We also strive to be flexible in our acceptance of any late representations.</p> <p>The Council determines its own applications, or those in which it is a partner in line with the requirements set down in the relevant planning acts and Planning Policy Guidance/Statements, as well as the provisions of the strategic and regional policy and the Council's own UDP. Any departure from the London Plan or the UDP would result in an application being referred to GOL for their direction.</p> <p>With the exception of major proposals when the Council may seek to engage the community at a very early stage, the Council would consult when an application is registered.</p> <p>The Council are constantly looking raising and maintaining the standards of report writing. Your comments have been noted and we will re-examine these issues taking cognisance of the points that you have raised. The Team Leaders for Development Control North and South will undertake this task.</p>
20/074	Page 7 Para 3.7 Bullet 2 Involving young children and young	HFRA	Participation in local affairs by young people should be carried out within an educational context free of political influence. Residents and parents may object to their children being subject to a flow of information from the Council (who are a political body) unleavened by the mentoring and questioning balance that educational	Noted.

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	people		professionals would deem essential to supply in guiding children through complex issues. Materials used in consultation to this group should be subject to safeguards, and the community of “young people” needs to be defined and, if necessary, segmented into different age groups, with perhaps the lower age being 18 i.e. the voting age.	
20/075	Page 8 para 3.12 Who will be involved?	HFRA	The role of Councillors is to establish policy but a Councillor’s role is not properly discussed in the SCI in the area on policy formulation. For Councillors to have a view of the planning needs of wards and the borough they must be brought to an awareness of the issues. Though not all residents get involved in planning, many people do know about local issues and problems, and so Councillors themselves need to have a clear view of the issues as perceived by their constituents.	Noted, and we have revised the document with the aim of raising and defining the role and profile of Councillors in the planning process. Their role is set out in the Constitution. See also para 7.8 of the SCI which sets out the role of councillors.
20/076	Page 8, Para 3.12	HFRA	Local community appear to be excluded from the foundation of policy making. ‘Resident/tenant groups and associations’ are only listed in the stakeholder list of Appendix 5 under organisations’ the Council will also seek to’ engage and consult with. These groups should be held in higher regard and more effort made to engage them. The council does not have a comprehensive list of residents’ groups in the borough, and nor does it make a list widely available to other Council departments, which it should do.	The local community has not been excluded from the foundation of policy making. Table 2 sets out clearly who the stakeholders in consultation are and the local community are very clearly listed.
20/077	Page 8, para 3.12 stakeholder Appendix 5 (page 37)	HFRA	English Heritage should be listed under “Other Consultees” and not as a ‘will seek to’.	The procedure for consulting English Heritage is set out in Circular 01/2001 Heritage Applications. English Heritage are listed under other consultation bodies that will be consulted where appropriate. The provisions of Circular 01/2001 will be adhered to in determining whether English Heritage should be notified or not.
20/078	Page 8, table 3 – Community Involvement Principles	HFRA	The SCI offers no insight into how needs are to be weighed for different communities or how the competing interests of communities are to be reconciled. Openness must be recognised as a principle and the first step would be that the SCI Principles recognises that consultation has to actively discuss differing needs and competing interests and to encourage the community. The presentation of policy rarely comes with a set of options with the pluses and minuses clearly drawn for discussion and this needs to	Addressed at the Issues and Options stage, and not appropriate at the Development Plan Policy Stage. Positives and negatives have already been established at the Issues and Options stage.

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			change.	
20/079	Page 8, table 3 Early Contact	HFRA	It is too late to involve people when a plan is drawn up. Determining the terms of debate is as much a subject for involvement as the debate itself, and consultation is not about justifying plans already made.	Table 3 states that we will seek to involve stakeholders at the earliest stage when plans are being proposed.
20/080	Page 9, Table 3 – Reducing Barriers	HFRA	All residents groups, irrespective of affiliation or constitution should be able to include themselves on the LDF database as a matter of course. The SCI needs to address several issues around this including who holds the database and how community groups can enrol themselves. These groups need to be able to state their sphere of interests by geographical area, policy interests and so on. Key details of the database should be open to the public and community groups via a website. Publicising via Haringey people magazine is not enough as there are widely acknowledged problems with its distribution. There should be a dedicated web page for community groups to register for these databases.	Noted. The Council is implementing a new software package for the LDF that will include a consultation database and allow users, (including new users) or consultees to log on and add or amend their details. They will also be able to make representations, view other representations and view Council and other feedback.
20/081	Page 9, para 3.14 and table 4 – Community involvement methods	HFRA	The SCI does not involve councillors in the community involvement methods even though councillors are a traditional channel of communication between Council and constituents. An element of the SCI should involve Councillors working with residents in consultation. The SCI is biased towards gathering opinion on policies already gestated. Rather, resources should be used to gather data to inform policy development rather than in researching opinion about policies already formed. Resources for ward by ward surveys are needed that identify, scope and inform residents and their representatives of key issues. There needs to be less emphasis on long and turgid documents, and more on face to face meetings with residents to reduce barriers.	Noted, and we have revised the document with the aim of raising and defining the role and profile of Councillors in the planning process. See also para 7.8 of the SCI which sets out the role of councillors.
20/082	Page 9 Table 4 – Council websites	HFRA	The LBH website is too large and shambolic, and a more systematic approach is needed if the web site is to be an effective tool in increasing the amount of involvement with the community. There should be a single web page with all current consultations and their timetables and links to relevant documents ad timetables as a bare minimum. Simplicity of download will be a key issue in ensuring effective consultation. Some documents are inaccessible due to their size. At the other extreme some documents were not ever available electronically.	Noted. We will seek to ensure that this is the case. We are constantly looking at the website and how we can improve it. We have undertaken considerable work recently in trying to provide as much good quality information as possible via the website. This is a continual process and we are constantly looking to try and ensure that the website is as helpful and user friendly as possible. We will take on board your comments with regard to

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				future development.
20/083	Page 10, para 3.15 – Council will exceed the minimum requirements for consultation	HFRA	This statement represents a generalised intent, but the SCI should refer to specific actions and activities in this regard: it could, for example, give specimen outlines of the activities it has in mind for the production of certain key planning documents and showing where and how the minimum requirements will be exceeded.	Each case will be looked at on its merits and where it is considered judicious to consult on an over and above the statutory minimum we will do so. It would be impossible to provide a definitive list on when we will do this as the merits of each case must be considered.
20/084	Page 13, para 5.4 – Notification Methods	HFRA	Methods should include use of email lists that Residents' Associations, community groups and residents can sign up for.	Noted, and we will look in to how we can effectively do this.
20/085	Page 14, Para 5.6 – Community Involvement Methods	HFRA	Councillors must work with residents in consultation for and the SCI does not enable this. Ward by ward discussion workshops should be considered in order to involve residents at an early stage. The list of methods in Appendix 2 is a shopping list and the SCI speaks purely in general terms about community involvement. The SCI should supply program outlines for what the Council will do when it consults on Development Plans.	There are existing mechanisms e.g. Councillor surgeries, area assemblies etc which allow interaction with Councillors. The Council is developing an implementation plan for the SCI which will address and provide more detail on the consultation methods to be used, including local workshops. See also para 7.8 of the SCI which sets out the role of councillors.
20/086	Page 14 para 5.6 - Community Involvement methods dependent on extent to which the document contributes to the desired outcome.	HFRA	“Desired outcome” is unfortunate wording and should be removed as the desired outcome should be full involvement by the community and thus support.	Independent examination occurs as we will never reach a consensus.
20/087	Page 14, para 5.6 Community Involvement Methods	HFRA	The SCI does not identify those areas of planning policy that are most suitable for broad based consultation and likely to have the most resonance with the community. Such policy areas include open space, housing, cycle routes, conversions, traffic, and safety amongst others. The SCI would benefit from an examination of the different approaches to be undertaken in the ‘harder’ versus ‘easier’ policy areas.	It would be wrong for the Council to single out those topics where they felt there was greater resonance with the community. These topics are fluid, and, in any event, to single out particular topics is not a role for the Council, but rather one that the community decides.

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20/088	Page 14, para 5.7 – Council to go further than minimum consultation requirements	HFRA	This statement represents generalised intent, but the SCI could give specimen outlines of the activities it has in mind for the production of certain key planning documents and showing where and how minimum requirements will be exceeded.	Each case will be looked at on its merits and where it is considered judicious to consult on an over and above the statutory minimum we will do so. It would be impossible to provide a definitive list on when we will do this as the merits of each case must be considered.
20/089	Page 14, para 5.7 Council recognises that planning system difficult to understand.	HFRA	Planning may be difficult to understand, but consultation shouldn't be. The Council must be committed to clarifying the issues and options in the course of consultation – this is a different principle to 'producing concise and easy to read documents'.	We will make every effort to ensure that we clarify the issues and options in the course of consultation. A sentence that reads "the Council are committed to clarifying the issues and options in the course of consultation wherever possible" has been added to the end of paragraph 5.7.
20/090	Page 14, para 5.7 – Council will be clear on the scope and the room for influence of community involvement activities.	HFRA	This gives the impression that the Council will reserve the right to decide itself what can be meaningfully consulted upon, and this is highly controversial if it will be used to inhibit public responses. If an objection is a good objection then it should stand, no matter the 'scope' or 'room for influence'. The purpose of the SCI is to facilitate and enable the community to articulate its expectations in full knowledge of the constraints. If superior or regional policies dictate that there is little flexibility in a policy then this should be stated in a draft document, and it should be made clear that this is the Council's view and not necessarily an established fact, as well as providing clear references to the relevant part of the higher level plan or policy which the Council feels constrains responses, and references to any balancing policies or case law that may indicate otherwise. The council should regard this as an essential element in making clear to the community what is being consulted upon at the outset.	The paragraph is not saying that the Council reserves the right to decide what can be meaningfully consulted upon, but it is imperative that the Council is clear about their scope and room for influence so that we do not raise unrealistic expectations of what can be achieved or what can be changed. We would be negligent if we did not make these constraints clear.
20/091	Page 14, para 5.9 – DPD making changes	HFRA	The SCI presuppose that the basic problem of consultation is explaining the process to people outside of the process so that they only comment in a 'convenient way'. Consultation should be structured so as to enable planning professionals to interpret what consultees mean without consultees requiring huge knowledge of the system.	Nowhere in the document does the Council seek only to obtain comments in a "convenient way". A simplification of the process to enable as many people as possible to comment and engage does not presuppose that we only want comments in a "convenient way". We welcome all comments and their relevance is not necessarily determined by how thorough an understanding of the planning process the consultee has.

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20/092	Page 14, para 5.9 – What happens and how long?	HFRA	Associations and residents should be included as a matter of course in identifying issues and options and Sustainability. The SCI refers to stakeholders in these sections, but it is not clear if this refers to Appendix 5, or whether it includes all entities mentioned in Appendix 5, or whether it has in mind other stakeholders.	We do this as a matter of course. Any mention of stakeholders in the SCI will inevitably have reference back to Appendix 5 “List of Consultation Stakeholders”.
20/093	Page 15, Para 5.9 How Long?	HFRA	A period of 6 weeks is too short for most community groups who meet on a monthly cycle and two months is the minimum required for groups to digest, generate drafts and consult with their guiding committees. Time limits which exclude possible responses defeat the purpose.	The table does not set out a maximum period of 6 weeks for consultation.
20/094	Page 16, para 5.13	HFRA	Para 5.13 says that appendix 7 has further details on community involvement stages for SPD but the box labelled ‘Community Involvement’ which hardly qualifies as a breakdown, and is not adequate for an SCI. This box needs greater content to ensure that community involvement is a meaningful term.	Appendix 7 sets out a timeline for the Supplementary Planning Document (SPD) which outlines the stages at which community consultation will take place. The whole of the Draft SCI sets out to show what community involvement is and that it is a meaningful term.
20/095	Page 16 Para 5.16 – Some issues cannot be influenced as they may be national or regional policies that the Council’s LDF must incorporate and keep to.	HFRA	If superior or regional policies dictate that there is little flexibility in a policy then this should be stated in a draft document, and it should be made clear that this is the Council’s view and not necessarily an established fact, as well as providing clear references to the relevant part of the higher level plan or policy which the Council feels constrains responses, and references to any balancing policies or case law that may indicate otherwise. The council should regard this as an essential element in making clear to the community what is being consulted upon at the outset.	Your comments have been noted and we will look at how we can implement this taking into account the officer and financial constraints.
20/096	Page 18, Para 6.4 Appendix 9 – neighbour notification.	HFRA	Neighbour notification does not include the local residents and tenant’s groups. Local groups have detailed contacts into the community and can easily identify and pass information to neighbours who may be affected or wish to comment.	Noted. Local residents and tenants groups have been added.
20/097	Page 19, table 10, planning application process: comments by the Design	HFRA	If the Design panel is to be respected and have credibility then: 1) the constitution of the panel must be made publicly available; 2) the names, qualifications and interests of the chair and of the others who sit on the Panel are made public; 3) the function of the Panel must be made clear and published; 4) declarations of interests such as professional involvement must be made public; 5) Design Panel	The terms of reference of the Design Panel are on the Council’s website. The Panel is chaired by Assistant Director Shifa Mustapha. Comments from the Panel are incorporated into the Officer’s report. We are currently giving consideration to setting us a Design

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	Panel		meetings should be publicised and the agenda of meetings made publicly available; 6) any comments made by the Design Panel to an application should be in writing and made available as part of the material associated with the final planning application.	Panel website.
20/098	Page 21 table 10 – Planning Application process: Advertising and Consultation.	HFRA	The SCI follows the statutory minimum in notifying residents of applications submitted and this is not satisfactory. More use could be made of the local press which has a widespread readership. Application notifications along the lines of currently done for applications in Conservation Areas – site address and two line descriptions – would raise much awareness.	Noted. The level of press entries and local site notices that this would entail means that it is unfeasible, both practicably and financially. All applications appear on a weekly press list and this is available online for all to check on a weekly basis.
20/099	Page 23, table 10 – planning application process: amenity groups	HFRA	The Council's list of these is not satisfactory, and all groups should be able to include themselves on these lists as a matter of course. The SCI needs look at 1) who holds the lists, 2) how community groups and tenants' groups etc can enrol themselves, 3) groups should be able to state their sphere of interests by geographical area, policy, planning interests and so on, 4) the list should be open to the public via a web site so that they can be assured that they are properly represented on it.	Agreed. The DC Support Team Leader is looking at the data base with a view to improving its efficiency, adaptability and ease of use wherever possible. See also 08/013.
20/100	Page 23 table 10 – planning application process; development control forum.	HFRA	Need a rethink as they are often seen as a forum for Council officers to justify an application rather than informing the public or facilitating a discussion. Developers, when present, stonewall by and large in the face of hostile questioning or are reduced to relentless promotion of their scheme. DCFs are largely set up to fail – the biggest issue being that they are far too late in the design process. They are unlikely to improve by being chaired by a Council member. The Council must increase its efforts to encourage promoters of major schemes to pursue genuine community involvement in good faith earlier on. Refusing to host a DCF unless such involvement had taken place might pay dividends.	The Development Control Forums (DCF) have been welcomed. They are there to advise those present of proposals that have been put before the Council for consideration. The Council does encourage meaningful consultation by developers and applicants before submission of an application, but they cannot force them to do this.
20/101	Page 24, table 10 – planning application process: re-consultation	HFRA	This should be a matter of course on major applications, particularly when changes are made prior to meetings of the relevant PASC. Significant objections are regularly sidelined by a procedure that means that the application determined on the night is not that consulted on.	The Council will re-consult when there has been a change in an application which is material and which the public/amenity groups have not had the opportunity to comment on previously.
20/102	Page 27, para 6.9 Control of advertisements	HFRA	Consultation on adverts should be mandatory for the Council and not discretionary. Given the sensitivity of the advertisement/poster issue in the borough, then public consultation should be done as a	The Council does consult on advertisements as appropriate although there is no legal requirement for us to do so on all

Ref	SCI section / paragraph	Contact Name/ Organisation	Comment	Council response
			matter of course.	advertisements.
20/103	Page 28, para 7.4 Community groups...resources the Council can tap into	HFRA	The SCI is too generic in its reference to community groups. The entire point of this SCI is to spell out clearly how the community can be expected to be involved. There is an issue of how the Borough can better access and use the knowledge of residents groups.	Para 7.4 of the Draft SCI highlights the resources that community groups have that the Council may be able to tap into.
20/104	Page 30, appendix 2: Methods of Community Involvement	HFRA	No reference is made to the role of elected representatives in community involvement.	Noted – a section on Councillors/MPs and their surgeries has also been added. See also See also para 7.8 of the SCI which sets out the role of councillors.
20/105	PAGE 30, Appendix 2 – methods of community involvement.	HFRA	No specific mention is made of residents or tenants associations in the Methods, or of their Haringey umbrella organisation, the Haringey Federation of Residents Associations, or the Friends of Parks groups and Haringey Friends of parks Forum.	Noted – a column on residents, tenants and other associations have been added.
20/106	Page 43 Appendix 9 – Neighbourhood notification	HFRA	Residents and tenants groups should be included in the notification list of all classes of development – and in particular conservation areas, advertisements, changes of use, major commercial/retail conversion, crossovers. As a general point, too few neighbours are recommended to be notified in every section of this table.	The neighbour notification set out in Appendix 9 is the bare minimum that we consult on. These minimums are regularly exceeded, but there are also inevitable instances when it offers no advantage to exceed these minimums.
20/107	Page 43, Appendix 9 – Neighbour Notification: Advertisements	HFRA	The definition of 'residential properties affected' is not supplied. This is an oversight – advertisements are a very sensitive issue in the Borough. The local residents groups should be notified as a matter of course.	Each case is looked at on its merits. It would be very difficult to unequivocally define this term so that no properties were ever missed out, and so each case is considered on merit.
21/108	Page 36 PARA 3.2	Avenue Gardens Residents Association (AGRA)	Community involvement should only be encouraged   participants have a belief that their inputs will make a difference. This belief would be strongly bolstered if there was in place a "separation of powers" between those officers involved in policy development and those involved in reporting on applications.	That separation of power already exists between the two in terms of management, although ultimately both work as part of the Local Planning Authority. Further the development plan process is subject to an independent inquiry.
21/109	Page 6 para 3.2 bullet 1	AGRA	Community involvement in development of planning policy is difficult for three reasons: 1) effort required to obtain and become familiar	The SCI seeks to begin the process of breaking down these barriers to effective

Ref	SCI section / paragraph	Contact Name/ Organisation	Comment	Council response
	Development of Planning Policy		with extensive documents – the Council has not made this easy in a way that does not trivialise or persuade the audience that they are not being patronised; 2) a belief by residents that the Council has already made up its mind and so response is a futile exercise. 3) A fond belief by residents that outcomes of planning policy are beyond their relevant horizon of interest, and thus not relevant to them.	consultation with the community. In doing so the Council hopes that, over time, these three problem areas will be minimised or even eradicated.
21/110	Page 6 Para 3.2	AGRA	<p>Community involvement in planning applications is problematic in three main areas: 1) often awareness of applications comes at a late stage and the statutory minimum for nearest neighbour notification is inadequate;</p> <p>2) Where the LBH is the sole developer or one of the partners in large applications should they then promote, and be judge and jury on these kinds of applications? The SCI should explicitly address measures and protocols that give confidence that the LPA is in a position to properly discharge these roles;</p> <p>3) There are no procedures that for example state when departments of the Council should first consult on an application in terms of dealing with applications from its own departments involving listed buildings, conservation area consents and works involving trees.</p> <p>There is also an issue of quality of report - these quality issues range from one of robustness and independence (especially when Council's own), to areas of simple competence in and understanding of the LPA's planning guidance which is very much an issue in smaller applications. This view is common amongst objecting</p>	<p>The Council make every effort to consult with local residents and groups as soon as is practicably possible. We also strive to be flexible in our acceptance of any late representations.</p> <p>The Council determines its own applications, or those in which it is a partner in line with the requirements set down in the relevant planning acts and Planning Policy Guidance/Statements, as well as the provisions of the strategic and regional policy and the Council's own UDP. Any departure from the London Plan or the UDP would result in an application being referred to GOL for their direction.</p> <p>With the exception of major proposals when the Council may seek to engage the community at a very early stage, the Council would consult when an application is registered.</p> <p>The Council are constantly looking raising and maintaining the standards of report writing. Your comments have been noted and we will re-examine these issues taking cognisance of the issues that you have raised.</p>

Ref	SCI section / paragraph	Contact Name/ Organisation	Comment	Council response
			organisations, and some Appeal Inspectors have reinforced it.	
21/111	PAGE 7 PARA 3.7 Bullet 2 Involving young children and young people	AGRA	Participation in local affairs by young people should be carried out within an educational context free of political influence. Residents and parents may object to their children being subject to a flow of information from the Council (who are a political body) unleavened by the mentoring and questioning balance that educational professionals would deem essential to supply in guiding children through complex issues. Materials used in consultation to this group should be subject to safeguards, and the community of "young people" needs to be defined and, if necessary, segmented into different age groups, with perhaps the lower age being 18 i.e. the voting age.	Noted.
21/112	Page 8 para 3.12 Who will be involved?	AGRA	The role of Councillors is to establish policy but a Councillor's role is not properly discussed in the SCI in the area on policy formulation. For Councillors to have a view of the planning needs of wards and the borough they must be brought to an awareness of the issues. Though not all residents get involved in planning, many people do know about local issues and problems, and so Councillors themselves need to have a clear view of the issues as perceived by their constituents.	Noted, and we have revised the document with the aim of raising and defining the role and profile of Councillors. See also para 7.8 of the SCI which sets out the role of councillors in the planning process.
21/113	Page 8, Para 3.12	AGRA	Local community appear to be excluded from the foundation of policy making. 'resident/tenant groups and associations' are only listed in the stakeholder list of Appendix 5 under organisations' the Council will also seek to' engage and consult with. These groups should be held in higher regard and more effort made to engage them. The council does not have a comprehensive list of residents' groups in the borough, and nor does it make a list widely available to other Council departments, which it should do.	The local community has not been excluded from the foundation of policy making in table 2 sets out clearly who the stakeholders in consultation are and the local community are very clearly listed
21/114	Page 8, para 3.12 stakeholder Appendix 5 (page 37)	AGRA	English Heritage should be listed under "Other Consultees" and not as a 'will seek to'.	The procedure for consulting English Heritage is set out in Circular 01/2001 Heritage Applications. English Heritage are listed under other consultation bodies that will be consulted where appropriate. The provisions of Circular 01/2001 will be adhered to in determining whether English Heritage should be notified or not.
21/115	Page 8, table 3 – Community	AGRA	The SCI offers no insight into how needs are to be weighed for different communities or how the competing interests of	Addressed at the Issues and Options stage, and not appropriate at the Development Plan

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	Involvement Principles		communities are to be reconciled. Openness must be recognised as a principle and the first step would be that the SCI Principles recognises that consultation has to actively discuss differing needs and competing interests and to encourage the community. The presentation of policy rarely comes with a set of options with the pluses and minuses clearly drawn for discussion and this needs to change.	Policy Stage. Positives and negatives have already been established at the Issues and Options stage.
21/116	Page 8, table 3 Early Contact	AGRA	It is too late to involve people when a plan is drawn up. Determining the terms of debate is as much a subject for involvement as the debate itself, and consultation is not about justifying plans already made.	Table 3 states that we will seek to involve stakeholders at the earliest stage when plans are being proposed.
21/117	Page 9, Table 3 – Reducing Barriers	AGRA	All residents groups, irrespective of affiliation or constitution should be able to include themselves on the LDF database as a matter of course. The SCI needs to address several issues around this including who holds the database and how community groups can enrol themselves. These groups need to be able to state their sphere of interests by geographical area, policy interests and so on. Key details of the database should be open to the public and community groups via a website. Publicising via Haringey people magazine is not enough as there are widely acknowledged problems with its distribution. There should be a dedicated web page for community groups to register for these databases.	Noted. The Council is implementing a new software package for the LDF that will include a consultation database and allow users, (including new users) or consultees to log on and add or amend their details. They will also be able to make representations, view other representations and view Council and other feedback.
21/118	Page 9, para 3.14 and table 4 – Community involvement methods	AGRA	The SCI does not involve councillors in the community involvement methods even though councillors are a traditional channel of communication between Council and constituents. An element of the SCI should involve Councillors working with residents in consultation. The SCI is biased towards gathering opinion on policies already gestated. Rather, resources should be used to gather data to inform policy development rather than in researching opinion about policies already formed. Resources for ward by ward surveys are needed that identify, scope and inform residents and their representatives of key issues. There needs to be less emphasis on long and turgid documents, and more on face to face meetings with residents to reduce barriers.	Noted, and we have revised the document with the aim of raising and defining the role and profile of Councillors in the planning process. See also para 7.8 of the SCI which sets out the role of councillors.
21/119	Page 9 Table 4 – Council websites	AGRA	The LBH website is too large and shambolic, and a more systematic approach is needed if the web site is to be an effective tool in increasing the amount of involvement with the community. There should be a single web page with all current consultations and their	Noted. We will seek to ensure that this is the case. We are constantly looking at the website and how we can improve it.

Ref	SCI section / paragraph	Contact Name/ Organisation	Comment	Council response
			timetables and links to relevant documents ad timetables as a bare minimum. Simplicity of download will be a key issue in ensuring effective consultation. Some documents are inaccessible due to their size. At the other extreme some documents were not ever available electronically.	
21/120	Page 10, para 3.15 – Council will exceed the minimum requirements for consultation	AGRA	This statement represents a generalised intent, but the SCI should refer to specific actions and activities in this regard: it could, for example, give specimen outlines of the activities is has in mind for the production of certain key planning documents and showing where and how the minimum requirements will be exceeded.	Each case will be looked at on its merits and where it is considered judicious to consult on an over and above the statutory minimum we will do so. it would be impossible to provide a definitive list on when we will do this as the merits of each case must be considered
21/121	Page 13, para 5.4 – Notification Methods	AGRA	Methods should include use of email lists that Residents' Associations, community groups and residents can sign up for.	Noted, and we will look in to how we can effectively do this.
21/122	Page 14, Para 5.6 – Community Involvement Methods	AGRA	Councillors must work with residents in consultation for and the SCI does not enable this. Ward by ward discussion workshops should be considered in order to involve residents at an early stage. The list of methods in Appendix 2 is a shopping list and the SCI speaks purely in general terms about community involvement. The SCI should supply program outlines for what the Council will do when it consults on Development Plans.	Nowhere in the document does the Council seek only to obtain comments in a “convenient way”. A simplification of the process to enable as many people as possible to comment and engage does not presuppose that we only want comments in a “convenient way”. We welcome all comments and their relevance is not necessarily determined by how thorough an understanding of the planning process the consultee has.
21/123	Page 14 para 5.6 - Community Involvement methods dependent on extent to which the document contributes to the desired outcome.	AGRA	“Desired outcome” is unfortunate wording and should be removed as the desired outcome should be full involvement by the community and thus support.	Independent examination occurs as we will never reach a consensus on everything.
21/124	Page 14, para 5.6 Community	AGRA	The SCI does not identify those areas of planning policy that are most suitable for broad based consultation and likely to have the	It would be wrong for the Council to single out those topics where they felt there was greater

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	Involvement Methods		most resonance with the community. Such policy areas include open space, housing, cycle routes, conversions, traffic, and safety amongst others. The SCI would benefit from an examination of the different approaches to be undertaken in the 'harder' versus 'easier' policy areas.	resonance with the community. These topics are fluid, and, in any event, to single out particular topics is not a role for the Council, but rather one that the community decides.
21/125	Page 14, para 5.7 – Council to go further than minimum consultation requirements	AGRA	This statement represents generalised intent, but the SCI could give specimen outlines of the activities it has in mind for the production of certain key planning documents and showing where and how minimum requirements will be exceeded.	Each case will be looked at on its merits and where it is considered judicious to consult on an over and above the statutory minimum we will do so. It would be impossible to provide a definitive list on when we will do this as the merits of each case must be considered.
21/126	Page 14, para 5.7 Council recognises that planning system difficult to understand.	AGRA	Planning may be difficult to understand, but consultation shouldn't be. The Council must be committed to clarifying the issues and options in the course of consultation – this is a different principle to 'producing concise and easy to read documents'.	We will make every effort to ensure that we clarify the issues and options in the course of consultation. A sentence that reads "the Council are committed to clarifying the issues and options in the course of consultation wherever possible" has been added to the end of paragraph 5.7.
21/127	Page 14, para 5.7 – Council will be clear on the scope and the room for influence of community involvement activities.	AGRA	This gives the impression that the Council will reserve the right to decide itself what can be meaningfully consulted upon, and this is highly controversial if it will be used to inhibit public responses. If an objection is a good objection then it should stand, no matter the 'scope' or 'room for influence'. The purpose of the SCI is to facilitate and enable the community to articulate its expectations in full knowledge of the constraints. If superior or regional policies dictate that there is little flexibility in a policy then this should be stated in a draft document, and it should be made clear that this is the Council's view and not necessarily an established fact, as well as providing clear references to the relevant part of the higher level plan or policy which the Council feels constrains responses, and references to any balancing policies or case law that may indicate otherwise. The council should regard this as an essential element in making clear to the community what is being consulted upon at the outset.	The paragraph is not saying that the Council reserves the right to decide what can be meaningfully consulted upon, but it is imperative that the Council is clear about their scope and room for influence so that we do not raise unrealistic expectations of what can be achieved or what can be changed. We would be negligent if we did not make these constraints clear.
21/128	Page 14, para 5.9 – DPD making changes	AGRA	The SCI presuppose that the basic problem of consultation is explaining the process to people outside of the process so that they only comment in a 'convenient way'. Consultation should be structured so as to enable planning professionals to interpret what consultees mean without consultees requiring huge knowledge of	Nowhere in the document does the Council seek only to obtain comments in a "convenient way". A simplification of the process to enable as many people as possible to comment and engage does not presuppose that we only

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			the system.	want comments in a "convenient way". We welcome all comments and their relevance is not necessarily determined by how thorough an understanding of the planning process the consultee has.
21/129	Page 14, para 5.9 – What happens and how long?	AGRA	Associations and residents should be included as a matter of course in identifying issues and options and Sustainability. The SCI refers to stakeholders in these sections, but it is not clear if this refers to Appendix 5, or whether it includes all entities mentioned in Appendix 5, or whether it has in mind other stakeholders.	We do this as a matter of course. Any mention of stakeholders in the SCI will inevitably have reference back to Appendix 5 "List of Consultation Stakeholders".
21/130	Page 15, Para 5.9 How Long?	AGRA	A period of 6 weeks is too short for most community groups who meet on a monthly cycle and two months is the minimum required for groups to digest, generate drafts and consult with their guiding committees. Time limits which exclude possible responses defeat the purpose.	The table does not set out a maximum period of 6 weeks for consultation.
21/131	Page 16, para 5.13	AGRA	Para 5.13 says that appendix 7 has further details on community involvement stages for SPD but the box labelled 'Community Involvement' which hardly qualifies as a breakdown, and is not adequate for an SCI. This box needs greater content to ensure that community involvement is a meaningful term.	Appendix 7 sets out a timeline for the Supplementary Planning Document (SPD) which outlines the stages at which community consultation will take place. The whole of the Draft SCI sets out to show what community involvement is and that it is a meaningful term.
21/132	Page 16 Para 5.16 – Some issues cannot be influenced as they may be national or regional policies that the Council's LDF must incorporate and keep to.	AGRA	If superior or regional policies dictate that there is little flexibility in a policy then this should be stated in a draft document, and it should be made clear that this is the Council's view and not necessarily an established fact, as well as providing clear references to the relevant part of the higher level plan or policy which the Council feels constrains responses, and references to any balancing policies or case law that may indicate otherwise. The council should regard this as an essential element in making clear to the community what is being consulted upon at the outset.	Your comments have been noted and we will look at how we can implement this taking into account the officer and financial constraints.
21/133	Page 18, Para 6.4 Appendix 9 – neighbour notification.	AGRA	Neighbour notification does not include the local residents and tenant's groups. Local groups have detailed contacts into the community and can easily identify and pass information to neighbours who may be affected or wish to comment.	Noted. Local residents and tenants groups have been added.

Ref	SCI section / paragraph	Contact Name/ Organisation	Comment	Council response
21/134	Page 19, table 10, planning application process: comments by the Design Panel	AGRA	If the Design panel is to be respected and have credibility then: 1) the constitution of the panel must be made publicly available; 2) the names, qualifications and interests of the chair and of the others who sit on the Panel are made public; 3) the function of the Panel must be made clear and published; 4) declarations of interests such as professional involvement must be made public; 5) Design Panel meetings should be publicised and the agenda of meetings made publicly available; 6) any comments made by the Design Panel to an application should be in writing and made available as part of the material associated with the final planning application.	The terms of reference of the Design Panel are on the Council's website. The Panel is chaired by Assistant Director Shifa Mustapha. Comments from the Panel are incorporated into the Officer's report. We are currently giving consideration to setting up a Design Panel website.
21/135	Page 21 table 10 – Planning Application process: Advertising and Consultation.	AGRA	The SCI follows the statutory minimum in notifying residents if applications submitted and this is not satisfactory. More use could be made of the local press which has a widespread readership. Application notifications along the lines of currently done for applications in Conservation Areas – site address and two line descriptions – would raise much awareness.	Noted. The level of press entries and local site notices that this would entail means that it is unfeasible. All applications appear on a weekly press list and this is available online for all to check on a weekly basis.
21/136	Page 23, table 10 – planning application process: amenity groups	AGRA	The Council's list of these is not satisfactory, and all groups should be able to include themselves on these lists as a matter of course. The SCI needs look at 1) who holds the lists, 2) how community groups and tenants' groups etc can enrol themselves, 3) groups should be able to state their sphere of interests by geographical area, policy, planning interests and so on, 4) the list should be open to the public via a web site so that they can be assured that they are properly represented on it.	Agreed. The DC Support Team Leader is looking at the data base with a view to improving its efficiency, adaptability and ease of use wherever possible.
21/137	Page 23 table 10 – planning application process; development control forum.	AGRA	Need a rethink as they are often seen as a forum for Council officers to justify an application rather than informing the public or facilitating a discussion. Developers, when present, stonewall by and large in the face of hostile questioning or are reduced to relentless promotion of their scheme. DCFs are largely set up to fail – the biggest issue being that they are far too late in the design process. They are unlikely to improve by being chaired by a Council member. The Council must increase its efforts to encourage promoters of major schemes to pursue genuine community involvement in good faith earlier on. Refusing to host a DCF unless such involvement had taken place might pay dividends.	The Development Control Forums (DCFs) have been welcomed. They are there to advise those present of proposals that have been put before the Council for consideration. The Council does encourage meaningful consultation by developers and applicants before submission of an application, but they cannot force them to do this.
21/138	Page 24, table 10 – planning	AGRA	This should be a matter of course on major applications, particularly when changes are made prior to meetings of the relevant PASC.	The Council will re-consult when there has been a change in an application which is

Ref	SCI section / paragraph	Contact Name/ Organisation	Comment	Council response
	application process: re-consultation		Significant objections are regularly sidelined by a procedure that means that the application determined on the night is not that consulted on.	material and which the public/amenity groups have not had the opportunity to comment on previously.
21/139	Page 27, para 6.9 Control of advertisements	AGRA	Consultation on adverts should be mandatory for the Council and not discretionary. Given the sensitivity of the advertisement/poster issue in the borough, then public consultation should be done as a matter of course.	The Council does consult on advertisements
21/140	Page 28, para 7.4 Community groups...resources the Council can tap into	AGRA	The SCI is too generic in its reference to community groups. The entire point of this SCI is to spell out clearly how the community can be expected to be involved. There is an issue of how the Borough can better access and use the knowledge of residents groups.	Para 7.4 of the Draft SCI highlights the resources that community groups have that the Council may be able to tap into.
21/141	Page 30, appendix 2: Methods of Community Involvement	AGRA	No reference is made to the role of elected representatives in community involvement.	Noted – a section on Councillors/MPs and their surgeries has also been added. See also para 7.8 of the SCI which sets out the role of councillors.
21/142	PAGE 30, Appendix 2 – methods of community involvement.	AGRA	No specific mention is made of residents or tenants associations in the Methods, or of their Haringey umbrella organisation, the Haringey Federation of Residents Associations, or the Friends of Parks groups and Haringey Friends of parks Forum.	Noted – a column on residents, tenants and other associations have been added.
21/143	Page 43 Appendix 9 – Neighbourhood notification	AGRA	Residents and tenants groups should be included in the notification list of all classes of development – and in particular conservation areas , advertisements, changes of use, major commercial/retail conversion, crossovers. As a general point, too few neighbours are recommended to be notified in every section of this table.	The neighbour notification set out in Appendix 9 is the bare minimum that we consult on. These minimums are regularly exceeded, but there are also inevitable instances when it offers no advantage to exceed these minimums
21/144	Page 43, Appendix 9 – Neighbour Notification: Advertisements	AGRA	The definition of 'residential properties affected' is not supplied. This is an oversight – advertisements are a very sensitive issue in the Borough. The local residents groups should be notified as a matter of course.	Each case is looked at on its merits. It would be very difficult to unequivocally define this term so that no properties were ever missed out, and so each case is considered on merit.
22/145	General	Thames Water	No comments – “Thames Water would like to thank you for the opportunity to comment on the above document and are satisfied	Noted and welcomed.

Ref	SCI section / paragraph	Contact Name/ Organisation	Comment	Council response
			that we have been included as a consultee.	
23/146	Page 19, para 6.3 Table 10 and p32 Appendix 2	Bob Maltz	The Design panel is described as a “user panel” or “representative group”. It is necessary to make clear how and by whom such a “design panel” is selected and what interests its members may represent. Its comments on any application should be in writing and publicly available.	The Panel is an expert panel comprising experienced architects, urban designers and landscape experts. The Panel is selected on the basis of skill area and do not represent any interest groups.
23/147	Page 24 para 6.3 Table 10	Bob Maltz	Re-consultation should be the norm. Failure to re-consult on changes to an application places consultees at an unfair disadvantage during later stages of consultation.	Where a ‘material change occurs in an application the Council will consult as a matter of course
24/148	Page 27 para 6.9	Bob Maltz	Advertisements have a major impact and should be subject to routine and not exceptional consultation.	The Council does consult on advertisements where it is considered necessary although there is no legal requirement to consult on all advertisements.
24/149	Page 47 Appendix 11	Bob Maltz	Consulting the arboriculture department only on a “development involving the loss of trees” is inadequate as often an application will claim that no trees are lost and many such applications may indeed result in the loss of, or damage to, trees.	Where plans indicate that there may be an impact on trees on site, or even involve their removal, the Council will consult with the Council’s arboriculturalist and seek his or her expert opinion.
24/150	Page 43 Appendix 9	Bob Maltz	Re “General Household Developments”, “Erection of Boundary Fencing” – when the fencing is to a boundary separating a property from public space, including a footpath or road, more than just the “adjacent properties” should be consulted. It should be 10 properties to either side and those opposite them.	The Council regularly exceeds the statutory minimum for consultation, and looks at each case on its merits in determining who might reasonably be affected by a proposal and consults accordingly.
25/151	Page 43, Appendix 9	Bob Maltz	Re “General Household Developments” – crossovers affect the whole street and more than just adjacent properties should be consulted. It should be 10 properties to either side and those opposite them.	The Council regularly exceeds the statutory minimum for consultation, and looks at each case on its merits in determining who might reasonably be affected by a proposal and consults accordingly. In conservation areas additional consultation will be carried out via site notices. It is agreed that properties opposite should be consulted as well. We will look at increasing the scope of consultation for formation of cross-over applications.
25/152	Page 43, Appendix 9	Bob Maltz	Re “Residential Development, “New Build” – on backland sites all properties surrounding the backland (not just surrounding that part of the backland which comprises the application site) should be consulted, together with 3 properties to each side of the site access	The Council regularly exceeds the statutory minimum for consultation, and looks at each case on its merits in determining who might reasonably be affected by a proposal and

Ref	SCI section / paragraph	Contact Name/ Organisation	Comment	Council response
			and those properties opposite them.	consults accordingly.
25/153	Page 43, Appendix 9	Bob Maltz	Re "All Applications" – any recognised local Residents Association should be consulted on all applications within their "catchment area".	Noted – the Team Leader DC Support is looking at how we use the database of Residents Associations for consultation purposes, and this aspect will be given consideration as part of that review. See also 08/013.
26/154	General	Muswell Hill Conservation Area Advisory Committee – John Crompton	The Consultation document was well researched and well represented and the appendices in particular provided an admirable summary of the various forms of consultation.	Noted.
26/155	General	Muswell Hill Conservation Area Advisory Committee – John Crompton	<b>Libraries</b> – there should be one large screen monitor computer in each library so that people can view plans more easily in order to get an overview of all the information that is on the page. Paper copies of the application should also be held at libraries for known major applications for which there is a wide interest. It is also very important that there is a weekly list of applications readily available at the libraries.	Noted. Your comments are being given consideration by the Team Leader for DC Support who will liaise with libraries on this point. The weekly list of planning applications is available via the website at libraries.
26/156	General	Muswell Hill Conservation Area Advisory Committee – John Crompton	<b>Accuracy of information on site notices and neighbour notification letters</b> – the CAAC received the same letters as neighbours and at every meeting there is at least one application where the description of the proposed development is not as described in the letter or on the site notice. An example is where three or four velux windows on the plans are not included in the description of the development. We understand that the Council is required to describe the application in the same terms as the applicant uses on the application form, so we would recommend that the planning officer takes time to check that the description which appears on the form ties in with what is shown on the drawings.	Noted. The application form and the drawings are currently cross referenced to see that they are saying the same thing. Obviously, if errors are occurring, then this process is not rigorous enough and we will look at how we can procedurally improve it. As you have noted, there is difficulty in this area as we need to balance the requirement to publicise the application as it has been described by the applicant whilst at the same time trying to make sure that the application description is useful to third parties.
26/157	General	Muswell Hill Conservation Area Advisory Committee – John Crompton	<b>Notification to residents in converted houses</b> – the current Council practice is to send one letter to each house, and the resident who gets to see the letter first is expected to share the information with other residents – this depends on good will, but it is important that each household within a converted house received adequate notice of an application because people living on a different floor might have a different view on how an application will affect them. We were advised by a previous Council leader that	The issue is not one of a financial constraint restricting the number of letters which are sent to properties in converted houses, rather it is often that the data is not accurate or up to date. We use a mixture of data available on GIS, iPlan and data provided by the post office. We do try to ensure that, through a variety of means, the consultation exercise we

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			financial constraints prevented the Council from notifying each flat separately. Has further consideration been given to doing this?	undertake do pick up these errors, but it remains a challenge to use and to many other planning authorities.
26/158	General	Muswell Hill Conservation Area Advisory Committee – John Crompton	<b>Development Control Forums</b> – these are challenging and labour intensive for planning officers, but they are useful, especially for complex cases. We would favour their continued use in appropriate cases.	Noted.
26/159	General	Muswell Hill Conservation Area Advisory Committee – John Crompton	<b>Site Notices</b> – the Council now does this as a matter of course in conservation areas and we trust that this will continue. Has consideration been given to extending this to outside conservation areas, especially for a change of use? E.g. a resident living above a shop can be subject to huge impact with a change of use from retail.	Noted. We are currently undertaking an exercise to review the use and format of site notices and will take your comments on board as part of this process.
26/160	General	Muswell Hill Conservation Area Advisory Committee – John Crompton	<b>Development Plan consultation</b> – community involvement is very laudable and was done for the current UDP, but one useful improvement would be on feedback on what happens to suggestions made.	Noted. We are looking at how we can usefully apply feedback (see comment 011 above).
27/161	General	Muswell Hill Conservation Area Advisory Committee – John Crompton	<b>Outcome of Appeals</b> – this may be out of the scope for the review, but the Council needs to have a better mechanism in place for monitoring the outcome of appeals which are dismissed. Information should be made available to PASC and interested parties which has timescales for regularising the planning position such as removal or alteration of an unauthorised extension or shop front.	This will be looked at by the Team Leader for DC Support. Outcome of appeals is reported to PASC as a standard item.
28/162		The Highgate Society – Michael Hammerson	A satisfactory and well intentioned effort to promote public involvement in the planning system and to bring greater transparency into the system. Some suggestions follow.	Noted.
28/163	General	The Highgate Society – Michael Hammerson	“Major” development needs some definition or needs to be interpreted sufficiently flexibly to allow for developments which are relatively minor in scale, yet significant in their possible impact on an area or in setting a precedent. The document should therefore be amended (e.g. at 3.14 Table 4) to mean “Major, sensitive or controversial”.	All definitions are interpreted flexibly with the onus on making sure that we consult widely enough. The case of sensitive or controversial applications which are not necessarily “major applications” (as defined by table 9) we will seek to ensure that we consult as widely as is deemed necessary. In some instances the Council will carry out further and more wide spread consultation where it is clear that the application is sensitive and there is a greater public interest than might have been initially

Ref	SCI section / paragraph	Contact Name/ Organisation	Comment	Council response
				anticipated.
28/164	General	The Highgate Society – Michael Hammerson	If the community is to be genuinely encouraged to be more proactive, the SCI should make clear that the aim is to streamline and speed up the planning process and avoid conflict at the planning application stage, through encouraging early community involvement in the concept and design of developments; not merely to add yet another layer of bureaucracy to an already complex and often opaque planning system.	Noted.
28/165	General	The Highgate Society – Michael Hammerson	The view, from Central Government down, is too limited in its interpretation of what community is. It would be helpful if the SCI stated that the community, both as individuals and groups, comprises local residents and businesses who, in their everyday working lives, command a wide range of professional and technical skills, and have detailed local and business knowledge, based on experience of what works and what does not, and this enables them to bring a unique element to the planning process which can materially help to speed up the planning process; and that developers and other applicants are strongly encouraged to tap into this resource at an early stage of their proposals, whatever the size or scale of their proposals.	Noted. Add two sentences at paragraph 6.1 to read: "The community can comprise both individuals and groups, many of whom command a wide range of professional and technical skills and have a detailed knowledge of the local area. Developers and other applicants are strongly encouraged to tap into this resource at the earliest possible stage of the (proposed) development process".
28/166	Page i Table 1 stage 5	The Highgate Society – Michael Hammerson	This should read December 2008 and not 2007?	Agreed, change to "December 2007"
28/167	1.6, line 5	The Highgate Society – Michael Hammerson	Here, as elsewhere, add "sensitive or controversial" after "major".	See comment 163 above.
28/168	1.9	The Highgate Society – Michael Hammerson	Will the methodology for the 3-year evaluation of SCIs be set out?	At paragraph 5.18 we set out how we will evaluate the SCI.
26/169	2.10	The Highgate Society – Michael Hammerson	We suggest that the final SCI sets out clearly what these various bodies are and how people may engage with them.	Details of some of these bodies and their functions and how they can be engaged with are on the web. However, we will add a final small paragraph to the SCI setting out how they are and how the public may engage with them.
26/170	3.2 – Why is planning	The Highgate Society – Michael	Amend the last sentence to read: "...open way, is responsive to local knowledge, and can benefit from local skills and experience to	Noted and changed.

Ref	SCI section / paragraph	Contact Name/ Organisation	Comment	Council response
	important?	Hammerson	help achieve the best possible solutions”.	
26/171	3.3 What do communities in Haringey look like? Bullet point 1	The Highgate Society – Michael Hammerson	3% sounds very low and would be better put in context by comparing it with the average population of each of the 34 London boroughs.	Noted, will look to get the statistics before the publication of the SCI.
26/172	3.7 – Older People	The Highgate Society – Michael Hammerson	The use of the phrase “older people is not defined and appears ageist. Reference instead should apply more specifically to certain older peoples’ groups who may currently be less engaged or hard to reach, and misleading generalisations generally avoided.	Agreed. Change to read “Mature Citizens” and mention of Muswell Hill and Highgate Pensioners Groups is made too.
26/173	3.8	The Highgate Society – Michael Hammerson	The constraints of getting everyone involved are accepted. However there should be a commitment to exploring how those community groups already actively engaged in the planning process might be encouraged to help other less actively engaged groups and individuals to become involved.	Agreed. Sentence added to read “The Council are committed to getting less actively engaged groups and individuals involved, and to supporting those who are already involved to support those who are not yet fully engaged”.
26/174	3.10	The Highgate Society – Michael Hammerson	Our comments in 3.8 also apply here.	Noted.
26/175	3.13 table 3 – Early Contact	The Highgate Society – Michael Hammerson	We strongly support this and have experienced the value of this through the Design Panel. If practicable, it might be considered worth extending these panels to operate on regional basis in order to promote community involvement in a wider range of developments. One approach might be to build on the existing Conservation Area Advisory Committee structure to ensure that there are CAACs in every area and similar committees for areas outside CAs.	The Conservation and Design Team have been working with the joint CAAC to widen the cover of local CAACs. We have worked with local residents in Tottenham to set up a Tottenham CAAC which has now been established.
26/176	3.13 table 3 Access to Information	The Highgate Society – Michael Hammerson	It is particularly important that development plan documents (DPDs), including SPDs etc are easily available to all community groups needing them, both electronically ) including on CD, and, as is sometimes required, in hard copy.	Agree. Although resources and costs mean that we will have to give careful consideration to provision on CD and whether we can make that possible.
26/177	3.13 table 3 reducing barriers	The Highgate Society – Michael Hammerson	As in 3.8 and 3.10 above, we believe that there is value in involving existing active groups in open days and seminars to help those who are less involved to increase their involvement. The issue of what is “major” is reiterated here. Haringey needs to take a flexible approach to judging whether a development is likely to be of local concern.	Agreed. A flexible approach is and will continue to be adopted.

Ref	SCI section / paragraph	Contact Name/ Organisation	Comment	Council response
26/178	3.13 table 3 Collaboration	The Highgate Society – Michael Hammerson	Add at the end “and ensure that a holistic approach is taken to multi-faceted issues e.g. those involving trees, listed buildings, traffic impact etc”.	Agreed – add sentence to read “and ensure that a holistic approach is taken to multi-faceted issues e.g. those involving trees, listed buildings, traffic impact etc”.
26/179	3.13 table 3 Feedback	The Highgate Society – Michael Hammerson	This should, where possible, include a summary of whether comments were taken on board in deciding an application and, if not, why not. The latter is important in helping residents to understand the legal and procedural constraints impacting on a local authority when considering an unpopular application, and to help them to focus their comments more accurately should a similar application arise in which they are interested. Otherwise officer time may be wasted having to deal with the same objections.	We have agreed to look at the issue of feedback following comments on applications as this is clearly something that the public and local groups would like (see also comment 011 above).
26/180	3.14 Table 4 Public Exhibitions etc	The Highgate Society – Michael Hammerson	Final line should be “major, sensitive or controversial planning applications (by developers)”.	See comment 163 above.
26/181	3.14 Table 4 Council magazines etc	The Highgate Society – Michael Hammerson	Distribution of these is very irregular at present.	This matter has been raised with our Communications and Consultations Office who are responsible for the publication and distribution of Haringey People and any other Council magazines.
26/182	3.15	The Highgate Society – Michael Hammerson	We are very encouraged by the Council’s commitment to “exceed the minimum requirements for consultation and publicity as set out in the Regulations...”	Comments noted and welcomed.
26/183	3.16	The Highgate Society – Michael Hammerson	It would be helpful to add: “we will also recommend all applicants, regardless of the scale or size of their applications, to consider talking to neighbours, amenity groups, conservation Advisory Groups, Conservation Advisory Committees etc to maximise the benefit of local knowledge and, through early discussions, increase the likelihood that the application will be unopposed”.	Noted and added. Please be aware that applicants would be doing this on a voluntary and informal basis.
26/184	Chapter 4 the LDF	The Highgate Society – Michael Hammerson	The current complex structure of planning and the plethora of acronyms in use is one reason why groups don’t engage. It needs to be as comprehensive and simple as possible in order to attract, rather than deter these groups.	We have revisited Chapter 4 and attempted to simplify the first page.
26/185	5.7	The Highgate Society – Michael Hammerson	We agree strongly that one way of circumventing the problems highlighted under Chapter 4 above is by providing different methods of involvement for different audiences.	Noted.

Ref	SCI section / paragraph	Contact Name/ Organisation	Comment	Council response
26/186	Table 7 Development Plan Making Stages	The Highgate Society – Michael Hammerson	<p><b>Documents available</b> – many of these are long and complex and relatively few have the time or patience to stay and study them at libraries or the planning office. While they may be available on the web, they should also be available in hard copy for those who wish to study them in detail.</p> <p><b>Final version</b> – “...we will consider all responses”. If people are to be asked to participate in the DPD process, and then to participate in the longer term the wider planning process, it is essential that they can feel confident that their responses are considered and taken on board where possible and, if not, that they can understand why.</p>	<p>We will make hard copies of document available wherever possible.</p> <p>Noted.</p>
26/187	5.14 Feedback	The Highgate Society – Michael Hammerson	It is realised that the Council cannot accept all views. However, ways of exploring giving feedback on comments received needs to be explored as this will, in the long term, give public confidence that it is worth staying involved in the process. The best way of encouraging engagement is to make people confident that their participation is worth while.	Noted. See comments above at 011 and 179.
26/188	6.0 Community Involvement: Planning Application Stages	The Highgate Society – Michael Hammerson	This is the most important part of the process. It will be difficult to engage even the most committed groups in the DPD process because it is complex and drawn out and, to some extent, theoretical and not easy for people to relate to what is actually going on. However, some people will be passionate and what to have a say on all types of applications. The more that people are involved in the process, the more they will understand it and the more change they will therefore accept. Much objections stems from a feeling of powerlessness to affect the process for the better.	Noted.
26/189	6.5	The Highgate Society – Michael Hammerson	Once again only “major” applications are referred to here, but major should be expanded to include “sensitive or controversial” throughout. Also we suggest adding at the end of the paragraph: “Applicants for all developments, whether or not “major”, will, where considered advisable, be recommended to carry out appropriate pre-application consultations with neighbours and other local groups who may be affected by, or interested in, the works, in the interests of avoiding delays through receipt of objections at the planning application stage”.	All definitions are interpreted flexibly with the onus on making sure that we consult widely enough. The case of sensitive or controversial applications which are not necessarily “major applications” (as defined by table 9) we will seek to ensure that we consult as widely as is deemed necessary. In some instances the Council will carry out further and more wide spread consultation where it is clear that the application is sensitive and there is a greater public interest than might have been initially anticipated.

Ref	SCI section / paragraph	Contact Name/ Organisation	Comment	Council response
26/190	Table 10 Planning application process – Pre application discussion (page 19)	The Highgate Society – Michael Hammerson	We suggest adding the following paragraph so that it does not seem that discussions are taking place behind closed doors before the public have the chance to comment: “where considered appropriate, and with the agreement of the applicant, outside interested individuals or bodies will be invited to attend pre-application discussions. This approach will also be adopted for smaller schemes of a sensitive nature or where their possible impact, whether on the building or on the site itself or on the wider area, is considered to be of wider interest”.	Noted. The Council will generally encourage applicants to make these discussions independently of their discussion with the Council. Pre-application meetings with the Council and amenity groups and neighbours are likely to be difficult to arrange and difficult to resource.
26/191	Table 10 – Pre application community involvement -	The Highgate Society – Michael Hammerson	Similarly add in line 3 add “for developers of major, sensitive or controversial sites, the developer will be directed...”	See comment 189 above.
26/192	Table 10 page 20	The Highgate Society – Michael Hammerson	Item (b) deletes the apostrophe in “officer’s”. We support the end of the last paragraph, but suggest adding: “Hence the pre-application involvement will, where appropriate, be encouraged for schemes, other than major, sensitive or controversial ones, if the council consider that they are likely to be contentious”.	Noted, altered and added (but taking out “sensitive or controversial”)
26/193	Page 21: Application Submitted.	The Highgate Society – Michael Hammerson	Start the second paragraph as follows. “As appropriate, applicants of major, sensitive or controversial schemes, and of all schemes in Conservation Areas, should also include the relevant documentation...” if we understand correctly, this is in any case a legal requirement for applications in Conservation Areas”.	All definitions are interpreted flexibly with the onus on making sure that we consult widely enough. The case of sensitive or controversial applications which are not necessarily “major applications” (as defined by table 9) we will seek to ensure that we consult as widely as is deemed necessary. In some instances the Council will carry out further and more wide spread consultation where it is clear that the application is sensitive and there is a greater public interest than might have been initially anticipated. Any relevant documentation that is required as part of an application in a conservation area will be requested.
26/194	Page 23 CAACS	The Highgate Society – Michael Hammerson	Under “Amenity Groups” it would be helpful to add: “They may also request the council to consider arranging pre-application discussions for any sensitive development”.	Noted and added.
26/195	Page 24 Re-consultation	The Highgate Society – Michael	While not legally required to, the issue of re-consultation on applications is very sensitive and can give rise to bad feeling and accusations of lack of transparency, and we hope that this section	Noted and altered.

Ref	SCI section / paragraph	Contact Name/ Organisation	Comment	Council response
		Hammerson	will be retained in its current form without any weakening. To maintain public confidence that changes will not be implemented without their knowledge, we suggest rewording the second sentence as follows: "The Council will sympathetically consider re-consulting when the following issues arise:-"	
26/196	Page 24 – Making a Decision PASC	The Highgate Society – Michael Hammerson	This section omits an important item of supporting evidence required to be submitted with an application. Bullet point "Photographs of site" should continue "including the surrounding properties and streetscapes in Conservation Areas or in other areas where there is a need to see an application in its wider context in order to come to a properly informed decision".	The Council may require contextual information and this may take the form of photographs, but the Council does not have the right under planning legislation to require photographs. However, where applicants are prepared to provide photographs in support of their application we would look to ensure that they are as useful as possible in helping to assess the application. As such we will take your comments on board in developing guidance notes to accompany the New Standards Planning Application Form (the 1APP which will be introduced from the 1 <sup>st</sup> October 2007 (1APP is a single standardised planning application form and is designed to end decades of inconsistency in the planning process. Existing planning application forms vary greatly between different local authorities, with different requirements on numbers of copies and additional information. This inconsistency is a major challenge to planning agents submitting applications in different localities, as they are unable to put one simple application process in place. 1APP will change this).
26/197	Page 25 Decision Feedback	The Highgate Society – Michael Hammerson	Add to bullet point 2: "Where considered advisable or helpful, and particularly where a planning consent is granted despite strong objections, a summary of reasons why such objections were not considered adequate to justify a refusal will be included in the Case Officer's report".	Noted. We will give consideration to including this in the report.
26/198	Appendix 5 page 35 or 36	The Highgate Society – Michael Hammerson	English Heritage, which has a wider remit for grade I and II* Listed Buildings and providing archaeological advice, should be added to either the "Specific Consultation Bodies" or the "Other Consultees where appropriate" lists, as should other statutory Consultees such	The procedure for handling heritage applications is set out in the Department of Culture, Media and Sport Circular DETR (01/2001).

Ref	SCI section / paragraph	Contact Name/ Organisation	Comment	Council response
			as Save Britain's Heritage and the Period Societies (e.g. Society for the Protection of Ancient Buildings, Georgian Society, Victorian Society, 20 <sup>th</sup> Century Society). We also suggest adding the Civic Trust and /or its London Regional Federation, the London Forum of Amenity and Civic Societies (an umbrella group for over 100 Civic Amenity Societies in the Greater London Area), and also the Council for British Archaeology (which we believe may be a statutory consultee, though not certain on this point) to "Other Consultees, where appropriate".	
26/199	Page 37 section titled "some of these groups may find it difficult"	The Highgate Society – Michael Hammerson	In accordance with suggestions made elsewhere in these comments add a further bullet point "- encourage community groups already engaged in the planning process to make their help and experience available to under-represented or hard-to-reach groups, wherever possible".	Noted and added.
26/200	Appendix 12 page 48 "Helpful contacts for advice and information"	The Highgate Society – Michael Hammerson	Organisations such as the Civic Trust and the Council for the Protection of Rural England have helped websites with planning advice and information, and you may like to consider asking these bodies whether they would be willing to be included.	The procedure for handling heritage applications is set out in the Department of Culture, Media and Sport Circular DETR (01/2001).
27/201	General	Haringey NHS	"Welcome the approach by the LBH to involve local people in decisions about planning and use of local land, and support your approach to this".	Noted.