

Thanet District Council

Local Development Framework

Statement of Community Involvement

Representations Statement (Regulation 31)





THANET DISTRICT COUNCIL – LOCAL DEVELOPMENT FRAMEWORK STATEMENT OF COMMUNITY INVOLVEMENT Representations Statement (Regulation 31)

This Statement of Consultation has been prepared to conform with the requirements of Regulation 31 of the Town and Country Planning (Local Developments) (England) Regulations 2004 relating to the handling of representations on Development Plan Documents. It sets out who we have consulted on the Statement of Community Involvement, how the consultation was carried out and gives a summary of the main issues raised and the Council's responses.

Consultation under Regulation 28

The first draft of the SCI was subject to public consultation in February 2006. 46 representations were received and the SCI was amended to incorporate some of those comments. The SCI Submission Document, DPD Matters and Statement of Consultation were formally submitted to the Secretary of State on 31st August 2006, and were on public consultation for a six week period between 1st September and 13th October 2006.

The documents and comments forms were made available at all Council offices and local libraries during normal opening hours. This is set out in the DPD matters in Appendix A.

The SCI Submission Document, comments form, DPD Matters and Statement of Consultation were also made available on the Council's website at www.thanet.gov.uk/sci for people to view and download, and also stated where hard copies would be available for inspection (as above).

Adverts were placed in the Thanet Extra on 25th August and 1st September, detailing where the documents could be viewed and when comments needed to be submitted. An official notice was also placed in the Thanet Extra dated 1st September. Copies of the adverts and the notice can be found in Appendix B.

Copies of the documents and comments forms were sent to consultation bodies and individuals listed in Appendix C. This includes statutory consultees, local community groups and businesses, all those who replied to previous consultations on the SCI and those who requested to be kept informed. A presentation was given by request to the Thanet Voluntary Community Sector Forum to explain the SCI process and the public consultation on the Submission Document.

Number and Handling of Representations

All the representations received have been copied and made available to view at Council offices and all local libraries as required under Regulation 31(1)(a). Electronic copies are available on the Council's website as required under Regulation 31(1)(b), however personal details have been omitted for data protection reasons.

19 people made representations to the SCI submitting a total of 33 individual comments. 16 comments objected to the SCI, 4 comments supported it and considered it sound. 13 comments were either acknowledgements or advising of

contact details and were therefore neither objecting nor supporting. 2 respondents expressed a wish to give evidence in person, 5 respondents wish to present their case in writing. 2 respondents wish to rely on their original representations made to the first deposit draft of the SCI.

The objections received are summarised below:

General

- Not consulted at first consultation stage
- Various comments (7 objections) regarding the value of the SCI in general

Section 3

- Document should make reference to a 'A Vision for Kent' – the county-wide community strategy

Section 4

- Additional text required to specify consultation process for SPDs
- Additional text required for consultation process on allocated sites
- Hard to reach groups should include gypsies and travellers
- Consultation methods should include face to face discussions with young people

Section 5

- Query on whether a County department is consulted on planning applications for adult residential care homes
- Level of public response objecting to or supporting a planning application should be quantified and made available in committee report or verbally at planning committee
- Statutory agencies should be notified of new housing proposals at the earliest opportunity

More detailed summaries of the representations and the council's response can be found in the schedule in Appendix D. Copies of the full representations can be found in Appendix E.



APPENDIX A – DPD MATTERS (REGULATION 28)

REGULATION 28, TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) REGULATIONS 2004

STATEMENT OF COMMUNITY INVOLVEMENT – SUBMISSION DOCUMENT

DPD Matters	
Title:	Statement of Community Involvement – Submission Document
Subject Matter:	The Statement of Community Involvement (SCI) is applicable to the whole of the Thanet District. It sets out how the Council plans to establish common ground with the community, promoting consensus on the form and content of Local Development Documents that will form the Local Development Framework and how the community will be involved with planning applications.
Representation Period:	Representations can be made on the SCI submission document from 1st September – 13th October 2006.
Representations to be sent to:	The Programme Officer, Development Services, Thanet District Council, PO Box 9, Cecil Street, Margate, Kent, CT9 1XZ. Electronic form available at www.thanet.gov.uk
Document available for inspection at:	Thanet District Council Offices, Cecil Street, Margate, Kent, CT9 1XZ between 8.45-5.30 Mon-Thurs, 8.45-5.00 Fridays. It can be viewed online at www.thanet.gov.uk and is available at all local libraries.
Adoption Notification:	If you wish to be notified of the Inspector’s recommendations following the Examination in Public, and/or adoption of the SCI, please request this as part of your submissions.

APPENDIX B

Newspaper Adverts and Official notice (Please see separate PDF file)

APPENDIX C

List of those consulted under Regulation 28

Statutory Consultees

Organisation	Contact Name
Acol Parish Council	Mr. R. Kennedy
Ash Parish Council	Mrs J Potts
Birchington Parish Council	Mrs. Coleman
Broadstairs & St. Peter's Town Council	Mr. Dexter
Canterbury City Council	Mr. Adrian Verral
Chislet Parish Council	Mr G Eaton
Cliffsend Parish Council	Mr. Roy Wade
Dover District Council	Mr. David Whittington
Highways Agency	Mr. Howard Moore
Kent County Council	Mr. Dick Feasey
Manston Parish Council	Mrs. Twyman
Minster Parish Council	Mr. Owen
Monkton Parish Council	Miss Brown
Sandwich Town Council	Tracey Ward
South East England Regional Assembly	Mr. Mike Gwilliam
St. Nicholas-at-Wade and Sarre Parish Councils	Mrs. Francis
Stourmouth Parish Council	Mr J Lawn
Worth Parish Council	Mrs Janet Hughes

Local communities/individuals

Organisation	Contact Name
	Ms L Kelley
	Reverend Deutsch
	Mr R Tapp
	Mr Richard Garrett
	Mr M Baxter
	Mrs Jill Smith
	Mr Martin Tapp
	Mrs Barbara Marsh
	Mrs Sarah Rogers
	Mr C Cole
	Mr Rob Parsons
	Cllr. R Bayford
	Mr. John Fortun
	Ms H Cliff
	Mr Stevens
	Ms E Chapman
	Mr. Brian Smith-Stewart
	Cllr. Martin Wise
	Mr. L. B. Austin
	Mr. A. J. Beach
	Mr. S. Berger
	Mr. I Brown

Organisation	Contact Name
	Mr. A Bruce
	Mr. P. M. Causier
	Mr. T. R. Colls
	Mr. J. S. Crofts
	Mr Williams
	Mr. J. Feetham
	Mrs. Haberfield
	Mr. R. A. Handscomb
	Mr. N. Hitch
	Mr. M Jarvis
	Mr. D. Johnson
	Mr. B. C. Kirkham
	Miss C. Lawson
	Mrs. P. Martin
	Mr. N Penny
	Mrs. R. Quested
	Ms. T. A. Scanlan
	Mr. M. Silvera
	Miss L Simpson
	Mrs. A. Smith
	Mrs. H. M. Waddington
	Mrs. V. F. Wilson
	Mr M S Kirkaldie
	Mrs D Stickings
	Mr M Johnson
	Mr P M Saunt
	Mr T McCallum
	Miss J Burges
	Ms J Ogorman
	Ms S Tomlinson
	Mr AD Beddard
	Mr B Root
	Professor & Mrs I Roitt
	Mrs N A Linnell
	Mr P Martin
	Mr D Chittenden
	Mr W Stannard
	Mr & Mrs PV Whitehead
	Mr D J Webb
	Mrs CD Measor
	Mrs V Temple
	Mr R Macaulay
	Mr H R Webb
	Mr C F Nichol
	Mr R Tuppen
	Mr M Powe
	Ms D Grant
	Mrs M S Richardson

Organisation	Contact Name
	Mr D J Shileds
	Ms J Cann
	Mr K H Goulding
	Mrs Y Chambers
	A Hart
	Ms S Taylor
	Mr I D Carter-Chapman
	Miss S M Jackson
	Ms S A Russell
	Mr R I Smalley
	Mrs A Skelton
	Mr T Dawson
	Ms F Daly
	Ms A Liddell
	Mrs B Wareham
	Mrs J E Kelsey
	Mrs M E Davies
	Mr J, Mrs A, Ms E & Mr B Glover
	Mr T Cramp
	Ms S De Wolfe
	Mrs D Palstrom
	Mr J Sheppard
	Mr & Mrs P Martin
	Miss P Horn
	Mr B Lawrence
	Mr R B Hickson
	Miss H Smallwood
	Ms S Skinner
	Ms D Searle
	Mr and Mrs Macdonald
	Mrs A Downs
	Mr L Hicks
	Dr S Hameed
	Mr P H Bell
	Mr T S Edwards
	Mr N John
	Mr K Avery
	Mrs J Glyn
	Ms P V Archer
	Mr L A Sutton
	Mrs EA Lind
	Mr TCW Cramp
	Ms S Macdonald
	Ms S Viloma Mondesold
	Mr J Spalding
	Mr M Smith

Organisation	Contact Name
	Mr M Negin
	Ms L Sharpland
	Mr J White
	Mr J Parker
	Ms J Britton
	Ms E Kirby
	Mr A Bashford
	Mr BW Swain
	Mr A Wilson
	Mr P Murray
	Mrs J H Frenten
	Mrs P Hogben
	Mr P J Butterworth
	Miss PA Smith
	Mrs M Arnett
	Mr G Curtis
	Mr T Holmes
	Mr Abbott
	Mr Tapp
	Mr G W Page
	Mrs S Sutton
	Ms H Steedman
	Mrs D Moldrich
	Mr T Shale
	Mr JHA Collier
	Mr PJ Bone
	P Curtiss
	Mr & Mrs Richards
	Mr S Gay
	Mr HA Sandell
	Mr & Mrs L Bradby
	Mrs S Pankhurst
	Mr PR Miles
	Mr W Furness
	Mr J Adams
	Miss D Denyer
	Miss S Williams
	Mr W Belton
	Mr K J Luck
	Mr DWJ Horn
	Ms J Pittman
	Mrs E Sandum
	Mrs AI Keen
	Mr N Phillips
	Mrs E Martin
	Mrs J McCoy
	Mr J Couchman
	Mr A Beach

Organisation	Contact Name
	Ms D Tomkins
	Mr G Piantoni
	Mr P Brown
	Mrs Z Catley
	Mr S Banks
	Mrs Connolly
Action with Communities in Rural Kent	Ms. K Jackson
Dalby Square Project	Ms. J. Cranstone
Friends of Pierremont Park	Mr D Eldridge
Garlinge Residents Association	Mr. D. Greely
Gordon Road Action Group	Mrs. M. Maine
Margate Old Town Action Group	Ms. J Edwards
Margate Town Partnership	Ms. Sharne McCarthy
Millmead Residents Association	Mrs A Miskin
Pegwell & District Association	Mrs. J. Harding
Pegwell & District Association	Mrs. Vanessa Pratt
Ramsgate Twinning Association	Mrs J Coppock
Save Dreamland Campaign	Mr. N Laister
Surrey Road Area Action Group	Mr. R. Morland
Thanet Early Years Project	Ms. R. Friend

Other agencies

Organisation	Contact Name
Age Concern Broadstairs & St. Peter's	Ms. V Brewer
Age Concern Margate	Mrs. Sandra Matthews
Age Concern Ramsgate	
Campaign to Protect Rural England	Mr. D Cooper
Canterbury Gypsy Support Group	
Church Representative - Birchington	Rev. Canon Clements KHS
Church Representative - Broadstairs	Ms. C LeBlond
Countryside Agency	Ms. Fiona Fraser-Boulton
Defence Estates	Mr. P. D. King
East Kent Coastal Primary Care Trust	Ms. Hannah Price
East Kent Council for Voluntary Services	Ms. M Possee
East Kent Partnership	Ms. Janet Waghorn
East Kent Social Services	Mr. Derek Hall
East Kent Spatial Development Company	Mr. Bob Kersey
English Heritage	Mr. Steve Williams
English Nature - Kent Team	Ms. Susannah Peckham
Environment Agency	Mr. Tim Bassett
Friends Families & Travellers	Mr Stephen Staines
Government Office for the South East	Mr J Palmer
IOTCU Ltd	Mr P J Henderson
Job Centre Plus	Ms. Penny Dadds
KCC	Mr M Doole
Kent County Constabulary	Mr. B. Chapman
Kent County Council	Mr. Leigh Herington

Organisation	Contact Name
Kent County Council	Ms. Megan McKibbin
Kent County Council	Mr. Mike Smith
Kent County Council	Mr. Peter Gilroy
Kent County Council	Mr. David Hall
Kent County Council	Mr B Murphy
Kent County Council	Mr. Rob Smith
Kent County Council	Ms. Elizabeth Wrigley
Kent County Council - Fire Safety Service	
Kent Highways	Mr P Pittock
Kent Refugee Support Group	Ms. R. Cull
Kent Wildlife Trust	Mr Richard Moyse
Kent Youth & Community	Mr. R. Bonner
LA21 Group	Mr & Mrs B Smith-Stewart
Margate Civic Society	Mr S Vilette
Margate Yacht Club/Thanet Sports Council	P Battell
Marlowe Academy	Mr. Ian Johnson
Network Rail	Mr. C Price
New Life Christian Fellowship	Ms. J Moore
Office of Communications (OFCOM)	
Queens Road Baptist Church	Mr S Cave
Ramsgate Town Partnership	Mrs. P Brewer
SEEDA	Ms. J Griffin
SEEDA	Mr. Ken Mackness
SEEDA	Mr. C Schaber
South East England Regional Assembly	Mr. John Pounder
South East Regional Office	Mr. M. Chessell
Southern Water	Ms Susan Solbra
Sport England South East	Mr. Mick Anson
Sustainability Actions	Ms. V Elliott
Thanet Cycling Forum	Mr. D. Bush
Thanet Heart Support Group	Mr D Jolley
Thanet Youth Council	Mr. John Simmonds
The Georgian Group	
The National Trust	Ms. Jane Arnott
The Theatres Trust	Ms R Freeman

Service providers

Organisation	Contact Name
63 Westgate Bay Avenue	Ms. C. Crittenden
Action Committee for Thanet International Students	Ms S Wall
Basic Power	
Cummins Power Generation	Mr. John Ballinger
East Kent Coastal Teaching Primary Care Trust	Ms. Caroline Davis
Eastonways	Mr. Eric Easton
EDF	Mr. John Park
National Grid	
npower	

Organisation	Contact Name
Planestation	Mr. P. H. Tipple
Powergen	
Queen Elizabeth the Queen Mother Hospital	Mr. R Williamson
Scottish Power	
Seaboard Energy	
Seaboard Power networks PLC	Mr. J. Park
St Nicholas Primary School	Mr A Taylor
Stagecoach	Mr. Paul Southgate
Strategic Health Authority	Mr. Mike Daly
Strategic Rail Authority	Mr. David Quarmby
Swalec	
Thanet Community Transport	Mr. Ian Day
The British Wind Energy Association	Ms. Katie Adderley
Transco	

Business sector

Organisation	Contact Name
02 Ltd	
21 Tudor Street	Ms. A. Turner
Boys & Maughan	Mr A Baker
British Telecom	
BT Cellnet	
BT Payphones	
Business Link Kent	Ms. Jill Tipping
Campaign for Real Ale	Mike Benner
Clark Inns Ltd	Mr K Clark
Hutchinson 3G UK Ltd	
Isle of Thanet Tourism Association (ITTA)	Ms. Linda Cordell
Locate In Kent	Mr. Paul Wookey
Locate In Kent	Mr. Philip Last
Malcolm Judd and Partners	
Mercury One 2 One	
Mobile Operators Association c/o Mono Consultants Ltd	Ms C Wilson
NTL	
One 2 One Personal Communications	
Orange Personal Communications Services Ltd	
Pfizer Global Research & Development	Ms. Claire Blackbrow
R A Goodban & Son	Mr. R. Goodban
St Peters Village Tour	Mr B Sleighthome
Stuart Ross Associates	Mr. S Ross
TKB	Mrs J Clark
Vodafone	

Developers and landowners

Organisation	Contact Name
24 Burton Place	Mr. A. Henderson
Ashton Moore	
Bloomfields Ltd	Ms A Bloomfield
BSF Planning Consultants	Mr D Jarman
c/o Atisreal Limited	Ms. K. Walker
C/o Carillion Richardson Partnership	Mr. James Ager
Carter Jonas	Mr A Blackwell
Carter Jones	Mr. Simon J. Smith
Cattell Skinner Partnership	
Civil Aviation Authority (Safety Regulation Group)	
Clague Architects	
Cluttons	Mr. J Tenant
Cluttons LLP	Mr. Derek White
D. C. Manyweathers & Co	
David Hicken Associates	Mr John Collins
Designs Architecture & Planning	
Duncan & Graham Partnership	
Equals PM2	
Gleeson Homes Limited	Mr M Richardson
Halcrow Group Ltd	Mr. M Parsons
Hallam Land Management	Mr B Gilpin
Home Builders' Federation	Mr. P Errington
Hume Planning Consultancy	
Jennifer Owen Associates	Mrs. J. A. Owen
KMA	Mr. Matthew Utting
Land Securities Group Plc	Miss M. Nagy
Lee Evans de Moubray	
M. Goddard Planning Consultancy	
Martin Robeson Planning Practice	Paul Keywood
Messrs. Peacock & Smith	
Nathaniel Lichfield	Miss J Hill
Paul & Company	Ms W Sockett
Peacock & Smith	Mr Ed Kemsley
Peter Jackson Architects	Mr P Jackson
Philip Dadds	
Radley Contracts Ltd	Mr M Radley
Rapleys	Mr O Jefferson
Rapleys	Mr M Lea
Robin Escott Planning	Mr F A Robinson
Roger Tym & Partners	Mr O Spencer
Rosefarm Estates	Mr. B Neill
Ryden Homes	Ms H Koppers
S. F. Morgan	
Smith Stuart Reynolds	Mr. S.J. Smith
St. Crispins Homes	
The Barton Willmore Planning Partnership	Mr. Guy Flintoft

Organisation	Contact Name
The Planning and Development Consultancy	Trevor Herron
Trevor A Davies	
West Waddy ASD	Mathew Ashton
Westbury Homes (Holdings) Ltd	Mr. Graham Norton

APPENDIX D

Schedule of representations

Representations to consultation under Regulation 28

Respondent Number	001
Representation Number	01/gen/xx
Object/Support	No Comment
Chapter	
Paragraph	
Test of Soundness #	
Intent	OR
Summary of Representation	Welcome opportunity to comment, requested to be included on database
Council's Response	Noted
Proposed Action	Details added to database as requested

Respondent Number	002
Representation Number	01/gen/xx
Object/Support	No Comment
Chapter	
Paragraph	
Test of Soundness #	
Intent	
Summary of Representation	Advising of change of contact
Council's Response	Noted
Proposed Action	Database amended accordingly

Respondent Number	003
Representation Number	01/gen/xx
Object/Support	No Comment
Chapter	
Paragraph	
Test of Soundness #	
Intent	
Summary of Representation	Advising of change of contact details
Council's Response	Noted
Proposed Action	Database amended accordingly

Respondent Number	004
Representation Number	01/gen/xx
Object/Support	No Comment
Chapter	
Paragraph	
Test of Soundness #	
Intent	

Summary of Representation	
Council's Response	
Proposed Action	

Respondent Number	005
Representation Number	01/gen/xx
Object/Support	No Comment
Chapter	
Paragraph	
Test of Soundness #	
Intent	
Summary of Representation	
Council's Response	
Proposed Action	

Respondent Number	006
Representation Number	01/gen/xx
Object/Support	Object
Chapter	
Paragraph	
Test of Soundness #	
Intent	
Summary of Representation	Objector replied to initial questionnaire but notification of consultation on the draft SCI was not received, therefore no comments were made at previous stage
Council's Response	There does not appear to be a response to the questionnaire 'Be Part of the Plan' of July 2005 from the Objector. However the objector did respond to the consultation on the Issues and Options paper which was an initial consultation for the Core Strategy in August 2005. When the Council consulted on the first draft of the SCI, simultaneous consultations were carried out with the SCI and the Proposed Modifications to the Thanet Local Plan. The objector was sent a letter dated 15th February 2006 advising of these simultaneous public consultations.
Proposed Action	None

Respondent Number	006-02
Representation Number	02/4/1
Object/Support	Object
Chapter	4
Paragraph	
Test of Soundness #	1
Intent	WR
Summary of Representation	Request additional text to specify process for consultation for Supplementary Planning Documents as this will ensure that the SCI complies with minimum requirements as set out in the regulations for SPDs. Suggests text be added as follows: 'The process for preparing

	<p>Supplementary Planning Documents is similar to the process for preparing Development Plan Documents, except there is only one formal stage of consultation, and there is no Public Examination.</p> <p>At the formal consultation stage, a draft document will be published and advertised in accordance with Regulation 17. It will be made available for inspection at offices and on the website, and sent to relevant specific consultation bodies for comment'.</p>
Council's Response	Agree that the process for Supplementary Planning documents should be included.
Proposed Action	Insert objector's suggested wording as a new paragraph after 4.14 if the Inspector considers this appropriate

Respondent Number	006-03
Representation Number	03/4/1
Object/Support	Object
Chapter	4
Paragraph	
Test of Soundness #	1
Intent	WR
Summary of Representation	Objector suggests new paragraph after 4.13 regarding consultation on allocated sites as follows: 'Some Development Plan Documents will allocate sites for development. People that respond may suggest alternative sites or changes to the boundaries of these allocations. The Council will consult on these suggestions in accordance with Regulation 32. This includes sending notification and the address of the sites to specific consultation bodies'.
Council's Response	Additional consultation on allocated sites does appear to be omitted in this SCI.
Proposed Action	Insert objector's paragraph after paragraph 4.13, and add the words ' <i>and deal with the representations in accordance with Regulation 33</i> ' before the last sentence, if the Inspector considers this to be appropriate.

Respondent Number	007
Representation Number	01/gen/xx
Object/Support	No Comment
Chapter	
Paragraph	
Test of Soundness #	
Intent	OR
Summary of Representation	(Comments from letter dated 1 March 2006) Results of local consultations often ignored because of interference from national government or other political persuasion on matters of strictly local relevance. This is a cause of local apathy.
Council's Response	(Response to original objection) The Council is obliged to follow instructions from national government or other political persuasions. This is not a matter that can be

	addressed via the Statement of Community Involvement
Proposed Action	No change

Respondent Number	007-02
Representation Number	02/gen/xx
Object/Support	No Comment
Chapter	
Paragraph	
Test of Soundness #	
Intent	OR
Summary of Representation	(Comments from letter dated 1 March 2006) Feedback is important if adequate weight is to be attached to the consultation process and results.
Council's Response	(Response to original objection) Agree with the objector that feedback is important following any form of public consultation as paragraph 61 acknowledges. The council has provided feedback so far on the consultations carried out under the new planning system, and will continue to do so for further consultations.
Proposed Action	No change

Respondent Number	007-03
Representation Number	03/gen/xx
Object/Support	No Comment
Chapter	
Paragraph	
Test of Soundness #	
Intent	OR
Summary of Representation	(Comments from letter dated 1 March 2006) Parish Councils should be listed and dealt with as representatives of the local community rather than as an 'other agency'
Council's Response	(Response to original objection) Agree - this may be more appropriate.
Proposed Action	Move 'Parish Councils' to the list under the heading 'Local Communities'

Respondent Number	008
Representation Number	01/gen/xx
Object/Support	No Comment
Chapter	
Paragraph	
Test of Soundness #	
Intent	OR
Summary of Representation	Original comment - letter dated 17th March 2006 - general comments regarding objectors role as a statutory consultee and advising of contact details.
Council's Response	Noted
Proposed Action	

Respondent Number	009
Representation	01/gen/5

Number	
Object/Support	Support
Chapter	
Paragraph	
Test of Soundness #	5
Intent	
Summary of Representation	
Council's Response	
Proposed Action	

Respondent Number	009-02
Representation Number	02/gen/xx
Object/Support	Object
Chapter	
Paragraph	
Test of Soundness #	
Intent	WR
Summary of Representation	Query regarding the means of consulting with East Kent Adult Services Directorate on planning applications for provision for adult care (eg residential homes)
Council's Response	The SCI states that with regard to planning applications, specific consultation will take place with bodies having a relevant interest. The concerns expressed by the East Kent Adult Services Directorate have been passed to the Councils Development Control Manager to ensure appropriate consultation takes place.
Proposed Action	No change

Respondent Number	010
Representation Number	
Object/Support	No Comment
Chapter	
Paragraph	
Test of Soundness #	
Intent	
Summary of Representation	Advising of change of contact details
Council's Response	Noted
Proposed Action	Database amended accordingly

Respondent Number	011
Representation Number	001/gen/xx
Object/Support	No Comment
Chapter	
Paragraph	
Test of Soundness #	
Intent	
Summary of Representation	Requesting details to be removed from database due to poor health
Council's Response	Noted

Proposed Action	Database amended accordingly
Respondent Number	012
Representation Number	01/4.22/4.
Object/Support	Object
Chapter	4
Paragraph	4.22
Test of Soundness #	4-5
Intent	WR
Summary of Representation	Gypsies and travellers should be included as hard to reach groups. Consideration should be given to developing focus groups from communities affected for policies likely to have a direct effect on them. To suggest that all ethnic groups can be contacted via the migrant helpline appears naive. Has a racial equality impact assessment been carried out on the SCI? CRE report (Common Ground 2006) recommends that all SCIs make specific mention of gypsies and travellers - a reflection of the huge negative impact that planning policy has and the resulting difficulties finding culturally appropriate forms of accommodation. Planning Circular 1/2006 is an attempt by government to ensure their needs are met.
Council's Response	It was considered that Gypsies and Travellers would fall within the 'Ethnic Minorities' group, and would not therefore need specific reference. However, the council is prepared to specify Gypsies and Travellers for clarity. A Racial Equality Assessment has not been carried out on the SCI, however the Council's Racial Equality Scheme sets out how racial equality is considered in all Council activities. The suggestion of contacting ethnic groups and refugees via the migrant helpline (para 4.24) is, as the SCI states, a possible solution and should not be considered as the only method that will be used to engage with such groups. Two groups representing gypsies and travellers are included on the main LDF database (Canterbury Gypsy Support Group and Friends Families and Travellers) and have been included on consultations on previous versions of the SCI and on Issues and Options for the Core Strategy. However the council will be happy to add any other groups or individuals that would make consultation with gypsies and travellers easier should the objector request their inclusion.
Proposed Action	Add the following to the table following para 4.24 if the Inspector considers this appropriate: Hard to reach group: Gypsies and Travellers Possible Solutions: Contact via organisations/support groups
Respondent Number	013
Representation Number	01/gen/1

Object/Support	Object
Chapter	all
Paragraph	
Test of Soundness #	1
Intent	AE
Summary of Representation	Circular 20/88 discourages local authorities from advertising as it cannot readily give out the finer details and therefore creates difficulties for the person involved with the SCI and Local Planning Authority (LPA)
Council's Response	The Town and Country Planning (Local Development) (England) Regulations 2004 require notice to be given by local advertisement in several instances. However, advertising is used in conjunction with other methods as demonstrated in the table on page 13.
Proposed Action	No change

Respondent Number	013-02
Representation Number	02/gen/2
Object/Support	Object
Chapter	all
Paragraph	
Test of Soundness #	2
Intent	AE
Summary of Representation	The LPA cannot link effectively with other community initiatives especially when there is an overriding political bias of which the SCI does not cater for due to its unwieldy nature. In fact we elect people to speak for us so how does this relate to the SCI.
Council's Response	Once the SCI has been adopted, future planning documents will need to demonstrate that they are in conformity with the SCI and linking effectively with other community initiatives.
Proposed Action	No change

Respondent Number	013-03
Representation Number	03/gen/3
Object/Support	Object
Chapter	all
Paragraph	
Test of Soundness #	3
Intent	AE
Summary of Representation	Timescale for any consultation and accuracy and validity is questionable at best the SCI overburdens any consultations and the LPA where quick decisions are required at local level. The SCI assumes that local organisations have more of a vested interest when they may only speak for 6-7 members whereas a public meeting and forum is a better way to involve people at all levels and allows for elected members help which the SCI does not cater for.
Council's Response	The SCI is a statutory document required under the Planning and Compulsory Purchase Act 2004. The table on page 14 sets out the appropriateness of consultation

	methods such as public meetings and forums.
Proposed Action	No change

Respondent Number	013-04
Representation Number	04/gen/4
Object/Support	Object
Chapter	all
Paragraph	
Test of Soundness #	4
Intent	AE
Summary of Representation	Time scales are more important in local issues and the accessibility is watered down by planning laws and regulations of which few people have knowledge of this weakness of knowledge and that the LPA is now overburdened (with SCI) will cause more problems due to the fact that it will take significantly longer and waste more time both at public level at the LPA which has a quality of life issue for all parties. One only has to look at how the inspector will view any subject matter sent in on the soundness tests yet any one who is willing to write in will have to set aside time and effort to put forward views and the people who put forward this SCI have not thought about peoples access and abilities and that any views made have a cost value to the general public who have to fund this weak SCI system which was forced on the LPA.
Council's Response	The Statement of Community Involvement is a statutory document, and there are statutory consultation procedures under the Planning and Compulsory Purchase Act 2004.
Proposed Action	No change

Respondent Number	013-05
Representation Number	05/gen/5.6
Object/Support	Object
Chapter	all
Paragraph	
Test of Soundness #	5-6
Intent	AE
Summary of Representation	The resources are not there to adequately manage the SCI effectively - it also puts extra tax burden on the community. It's a waste of time and a meaningless exercise. Resources on major decisions and community involvement would be better spent on referendums which shorten the time in any debate and involves all the community.
Council's Response	The SCI has been written considering the resources available to carry out consultation exercises. Some methods of consultation have not been included since resources are not available (for example face-to-face interviews). Appropriate methods of consultation are set out in the table on page 14.
Proposed Action	No change

Respondent Number	013-06
Representation Number	06/gen/7
Object/Support	Object
Chapter	all
Paragraph	
Test of Soundness #	7
Intent	AE
Summary of Representation	Difficult to see how that will happen when the LPA has to adhere to strict time scales on developer's proposals and development plan documents and supplementary planning documents. It also does not show if the community is against a development how the LPA will overcome having a SCI when the community will not get involved with the LPA this makes the SCI a meaningless system. There is an over reliance that everyone knows how the overburdened planning system works.
Council's Response	The council aims to plan an achievable workload with the resources available via the Local Development Scheme which will be revised when necessary. The 2004 Planning and Compulsory Purchase Act places a strong emphasis on community involvement and 'front loading' which should enable negotiations take place and avoid conflict situations as mentioned by the objector.
Proposed Action	No change

Respondent Number	013-07
Representation Number	07/gen/08
Object/Support	Object
Chapter	all
Paragraph	
Test of Soundness #	8
Intent	AE
Summary of Representation	Yes in time scale and monetary cost to the tax payer which again are quality of life issues
Council's Response	The Statement of Community Involvement is a statutory document which the Council will review when necessary in order to maintain a relevant document.
Proposed Action	No change

Respondent Number	014
Representation Number	01/3.5/9
Object/Support	Object
Chapter	3.5
Paragraph	
Test of Soundness #	9
Intent	AE
Summary of Representation	It is for the Inspector to decide whether in certain cases the level of public support should be a determining factor in planning applications – it should be and have proposed guidelines Essential that level of public opposition and/or support is

	<p>quantified and made available at Planning Committee either in officers report or verbally at committee and that this is minuted. This was not done at planning committee of 18th January</p> <p>Section 5.10 is a step in the right direction but public consultation should be mandatory</p>
<p>Council's Response</p>	<p>The determination of a planning application has to consider many different issues, one of these being public opinion. For major projects, such as the Turner Contemporary (as mentioned by the objector) extra public consultation exercises have been carried out, such as public exhibitions. However whilst public opinion is a significant consideration, it cannot be the sole reason for determining a planning application, therefore it would not be appropriate to hold referendums or base reasons on a majority vote as the objector suggests. Basing decision making purely on representations for and against a planning proposal would be contrary to our democratic process and unreasonably fetter the Planning Committee/Council in coming to a balanced and informed decision. However additional consultation exercises may be necessary as set out in Section 5 (paras 5.10 – 5.12) in the SCI, depending on the nature of the planning application.</p> <p>The planning application to which the objector is referring received 44 letters of support and 63 letters of objection, as stated in the Officer's report to Planning Committee on 18th January. It is understood that further objections were received after the committee report deadline. Whilst it was not possible to incorporate these in the committee report, they were made available to Members (via the Members Room) as is the case with all objections to planning applications.</p> <p>Section 5.10 relates to consultation prior to the submission of a planning application. It is the Council's intent to encourage developers to undertake public consultation before submitting a planning application. However, the council will still undertake its own consultation, possible using wider consultation methods, depending on the nature of the planning application.</p>
<p>Proposed Action</p>	<p>For the reasons given, it is not considered necessary to amend the SCI section regarding planning applications as this sets out how planning applications of varying significance will be consulted upon. It would not be appropriate to include public referendums or majority votes as methods of consultation, since public opinion is a significant consideration, however it is not the sole determining factor of a planning application as other planning issues need to be considered.</p>

Respondent Number	014-02
Representation Number	02/gen/xx
Object/Support	No Comment
Chapter	
Paragraph	
Test of Soundness #	
Intent	
Summary of Representation	Request details to be added to consultee list
Council's Response	Noted
Proposed Action	Database amended accordingly

Respondent Number	015
Representation Number	01/gen/5
Object/Support	Support
Chapter	
Paragraph	
Test of Soundness #	
Intent	
Summary of Representation	
Council's Response	
Proposed Action	

Respondent Number	016
Representation Number	01/gen/5
Object/Support	Support
Chapter	
Paragraph	
Test of Soundness #	
Intent	
Summary of Representation	
Council's Response	
Proposed Action	

Respondent Number	017
Representation Number	01/gen/xx
Object/Support	No Comment
Chapter	
Paragraph	
Test of Soundness #	
Intent	WR
Summary of Representation	Advise of change of title. General comments about matters upon objector would like to make detailed representations.
Council's Response	Noted
Proposed Action	Database amended accordingly

Respondent Number	018
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Representation Number	01/2/2
Object/Support	Object
Chapter	2
Paragraph	
Test of Soundness #	2
Intent	WR
Summary of Representation	Document should make reference to Community Plans of adjoining districts and the county-wide Community Strategy 'Vision for Kent'. Accepts TDC view that there are many documents that are relevant and to include them all would be impractical, but reference to these should be made in a scoping exercise for the development plan document.
Council's Response	The scoping exercise for a DPD would include references to a wide variety of documents. The Vision for Kent will be a very significant document as the county-wide community strategy. However it is not considered appropriate to include it in the SCI, although if the Inspector wishes to include this reference the Council has no objection.
Proposed Action	No change

Respondent Number	018-02
Representation Number	02/5/9
Object/Support	Object
Chapter	5
Paragraph	
Test of Soundness #	9
Intent	WR
Summary of Representation	KCC and other statutory agencies should be notified of new housing proposals at the earliest opportunity
Council's Response	Section 5.2 states that the Council will consult specific statutory and non-statutory consultees where appropriate. This comment has been passed to the Development control Manager for information.
Proposed Action	No change

Respondent Number	018-03
Representation Number	03/4.22/5
Object/Support	Object
Chapter	4
Paragraph	4.22
Test of Soundness #	5
Intent	WR
Summary of Representation	Face-to-face discussions with young people should be included. Given that half the respondents were aged 65+ and that the LDF is concerned with the long term future, it is considered essential that targeted initiatives to actively engage young people are sought.
Council's Response	Agree that face-to face discussions would be desirable. The 'possible solutions' column does suggest presentations to schools/student committees. However,

	as the objector acknowledges, face to face discussions are resource intensive and for that reason it would be inappropriate to include such a commitment in this SCI. It may be possible for this to be included in an SCI review if resource circumstances change.
Proposed Action	No change

Respondent Number	019
Representation Number	01/gen/xx
Object/Support	Support
Chapter	
Paragraph	
Test of Soundness #	
Intent	
Summary of Representation	Requested details to be added to database for future consultations.
Council's Response	Noted
Proposed Action	Database amended as necessary

APPENDIX E

Copies of representations (Please see separate PDF file)