

Statement of Community Involvement Consultation Responses

Section		Why is the Statement of Community Involvement being reviewed?
Name	Organisation	Comment
Barbara Cooper - Kent County Council	Kent County Council	<p>Thank you for consulting Kent County Council (KCC) on the Statement of Community Involvement (SCI) Review.</p> <p>As a provider of key infrastructure and services, the County Council values the opportunity to review and comment on the SCI Review. The County Council views this document as an important part in delivering genuinely constructive engagement between both authorities, enabling the planned delivery of high-quality growth in the Thanet District, properly supported by the strategic provision of necessary infrastructure.</p> <p>The County Council has reviewed the consultation document published and sets out its comments below, in order of the chapter headings within the document.</p>
David Morrish - CPRE Kent Thanet Branch	CPRE Kent Thanet Branch	<p>First Comment Inadequacy of Planning Portal .I have been very disappointed and disappointed with use unfriendly electronic submission arrangement/software on consultation form via the Planning Portal .I am adept at handling adequately of other Planning Portals/ HMG/Cabinet Office/DVLA/US Home Security/Companies House for on line communications and form but yesterday I lost a whole days input to this exercise .I have also found difficulties in importing script and impossibility of introducing diagrams .NEVERTHELESS I have retyped and recreated my commentaries on behalf of CPRE Thanet</p> <p>Perhaps rather than spending Council Tax payers money on ever more expensive Consultancies to bamboozle the public ,consideration instead should be given to the adequacy of basic communications .Moreover ,perhaps such difficulties with your Planning Portal may have discourage folk from using the Portal referred to in Commentaries (para 4.4 on page6).Additionally I have found the absence of a help line telephone number puzzling when elsewhere even the Inland Revenue offers help by phone .It has also been interesting to note that the "consultation on "The Statement of Community Involvement "is not included on TDC's Website</p> <p>Second General comment Draft CSI Document very disappointed that 2021 Draft is essentially the same as 2012 version despite communication methods having dramatically changed, allowing easier, more direct and more digitally focussed methods.TDC is already 3 years behind in carrying out a review -have you no new methods that can be seen likely to be applied in the next five years -I cannot believe THAT YOUHAVE NOT BEEN ABLE TO BE MORE SPECIFIC !</p> <p>CPRE Thanet Branch accept that there may be advantages in greater use of digital technology in this process but we must also follow international best practice to ensure there are sufficient feedback loops in the process to help explain to communities, the complex matters being considered and the reasons for the local authority's proposed plan. Further feedback loops would also help to prevent communities being surprised by the final plan and a feeling of being presented with a 'fait accompli' .which often seems to be the tactic deployed by TDC's</p>

Name	Organisation	Comment
		<p>Planning Officers As such, we recommend that the TDC , To demonstrate its commitment to ‘best in class’ engagement, to adopt the proposal in the Government’s Communities Framework 5 published in July 2019 to ‘strengthen community involvement in local placemaking... through a planning system centred on community involvement with statutory rights to become involved at every stage from plan making to planning application.</p> <p>We would like to further explore how community organisations ,Parish and Town Councils and charities such as CPRE could have a more formal role in a new system to help deepen meaningful engagement with the wider community in helping to shape their local area. For the new proposals to work effectively, they must be adequately resourced from the start. This means allowing sufficient time for consultations to take place and to allow them to be meaningful. It also requires that local authorities have the cash, staff, and skills resources to operate the new planning system. From the evidence that TDC always has sufficient finance to employ top Consultants to produce expensive reports it would not seem unreasonable to spend more in consultations with the Local Electorate</p> <p>Third General Comment Community Involvement</p> <p>Compared to the comprehensiveness of the NPPF and guidance notes on most other aspects of the design planning processes, we are strongly disappointed by the lack of detailed commitment to providing the for the crucial issue of community engagement. This reluctance seems to be at odds with the Corporate Statement(fromTDC Core Business Objectives 2019-2023) reproduced on the 3rd page of the Consultation Report which states :-</p> <p style="text-align: center;">"We will work with our communities to foster a shared responsibility and increase our community Engagement "</p> <p>The Officers seem not to be aware of the above statement of Councillors intention nor to have learned little from the experience of Community involvement that should have been learnt from the past seven years .As an example in North Thanet we have seen</p> <ul style="list-style-type: none"> • When in 2015 the pronouncement 'out of the blue' that Westgate on Sea had been 'chosen' to have nearly 2000 houses “bolted on” to it it was apparent that Officers had not done their homework insofar that the proposal for “Development at Westgate” was in fact an area that equally effected neighbouring Garlinge Civil Parish • As well as the of the geographic impact of Housing tha "Planning Officers " had managed to overlook and the especial impact upon the Scheduled Ancient Monument the DENT-DE-LION MEDIEVAL GATEHOUSE and needed the new Town Council at Westgate on Sea and "English Nature" to become aware of this important site • When the full impact upon Birchington ,Westgate and Garlinge -some 4000 houses- became apparent both Local Councils clamoured for public meetings to allow the public to become

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		<p>aware and make commentaries and eventually a one day exhibition was held during half term (when families were likely to be absent) at King Ethelberts School rather than at a local conference centre St. Augustines - where, subsequently public hearings of the Manston Public Enquiry were held. Having arranged the exhibition TDC made it clear that only Planning Officers would be involved and no Councillors were required to attend to defend the decisions that had been made</p> <ul style="list-style-type: none"> All in all, the Impression was given that the Governments National Housing figures and the need for Local Land Owners to 'stoke up' the value of their landholdings were far more important than the interests of Council Tax Tax Payers and the strategic value of First Class Agricultural Land <p>Elsewhere in Thanet during the Local Plan Process there were similar experiences of 'planning by stealth' and lack of information and no enthusiasm for deployment of experience of how elsewhere local planning authorities had properly involved the Community in Local Planning and in playing a more active role in design issues</p> <p>CPRE Thanet consider that as a result of the Planning Officers Ineptitude and the poor Consultation Methods deployed an impractical and unrealistic Draft Local Plan was produced as a result of which</p> <ul style="list-style-type: none"> A five year Local Plan by the Planning Inspectorate with requirements to accept nearly 200 pages of modifications to Policies etc and the production of a New Draft Plan <p>Essentially 7 years of planning have been needlessly wasted and those mistakes are likely to continue without more public information which a proper adequate Community Involvement Strategy</p>
Denise Johnson - Birchington PC	Birchington PC	<p>10. The Council supports the TDC objective '...to involve the Community as much as possible in the planning process'.</p> <p>11. Council agrees that '...local knowledge helps contribute towards meaningful and appropriate planning policy.'. However, it should be stated that local knowledge is not optional, and that it is vital to inform effective and relevant decision making.</p> <p>12. The Council agrees with the TDC statement that 'The more the community is involved in the planning process, the greater the ownership is of the planning decisions that shape the future of the area.'.</p> <p>13. The review is mandatory and long overdue, the changes in communications methods since the last review offer new opportunities but also risk greater exclusion, particularly for those unable to access digital systems.</p>
Gill Gray - Westgate on Sea Town Council	Westgate on Sea Town Council	Very clear and concise introduction to the Statement of Community Involvement Review.

Name	Organisation	Comment
Helen Scott-Cooper		I would like to see more done to engage with the local people in their communities. In their community, where they live, possibly work and educate their children. I would like to see more done linking with people where they are at; rather than the expectation they come to TDC.
Jacqueline Brown - N/A	N/A	I hope this will be the case with the proposed massive developments in Birchington, Westgate on Sea & Garlinge - There is a huge amount of local public opposition to these developments based on the fact there isn't the local infrastructure to absorb the massive population explosion this would generate
Penelope Wells		If the SCI should be reviewed every 5 years when was last review conducted?
Peter Lorenzo - The Broadstairs Society	The Broadstairs Society	It is a shame that the Statement of Community Involvement deals only with the planning process. As it stands it is a perfectly reasonable statement but I believe the District Council could improve its reputation (some would say infamy) if it truly embraced the concept of community involvement for all its services.
Ruth Burt		<p>The local plan for the massive and unjustified expansion of Garlinge and Westgate is flawed. No building should take place upon quality agricultural land whilst there are brownfield sites available in Kent. Thanet is a depressed area in regard to employment opportunities. These houses are not supported by sufficient amenities and logistics. But, crucially, there isn't the local need for housing on this scale which implies people from London overspill will fill them. Local people have a right to be worried about being swamped by this development.</p> <p>Westgate and Garlinge fields are unique habitats for songbirds, slow worms etc. The land fills the countries greengrocers with the vegetables Thanet is famous for. Being chalk the water table is unsuitable for this vast planned estate. Look after our environment. Promote the sustained green agenda. Stand up to central government by refusing to continue with this madness. There is no justification for development, in this critical area, on this scale. Local houses for local people.</p> <p>Don't be bullied because the council is too poor to resist. The lure of quick money from developers will cost you dear in the long term, it will not solve, even temporarily, TDCs financial issues.</p>

Section	What we will consult on	
Name	Organisation	Comment
Barbara Cooper - Kent County Council	Kent County Council	<p>Paragraph 9.6 - KCC recommends that Thanet's Gateway Plus is referenced earlier within the SCI, as appropriate.</p> <p>The County Council would recommend that all weblinks included within</p>

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		<p>the SCI are indicated using blue font and underlining to ensure they are clearly identified within texts.</p>
<p>David Morrish - CPRE Kent Thanet Branch</p>	<p>CPRE Kent Thanet Branch</p>	<p>Chapter 2 Commentary</p> <p>Para 2.5 Neighbourhood Plans .CPRE support the Principle of Neighbourhood Plans and it is with some dismay that we have noted the lack of Thanet Council’s enthusiasm for Neighbourhood Plans in recent years revealed by TDC’s actions in the withdrawal of specialist assistance to Town & Parish Councils and also the attempt to “torpedo” the Broadstairs & St.Peters Neighbourhood plan –which were actions indicative of a Planning Authority or Planning Officers contempt towards Neighbourhood Planning . This low number of Neighbourhood Plans in Thanet demonstrates the challenge that will exist in trying to front load community engagement at this stage. If our network – one of the most numerous participants in the planning system – thinks it will be hard to engage at this stage, it shows how challenging it will be to engage the wider public.CPRE Thanet hopes that TDC will take this opportunity now to convince us that it is really trying hard to "increase our community involvement " (see reference in Chapter1)</p> <p>para 2.8 reference is made to "Other Documents "which are non statutory.However many such documents which are non statutory are often vital to the understanding Local Planning and whilst they are costly and prepared by experts they should always be in the public realm.CPRE believe that documents such as</p> <ul style="list-style-type: none"> • drainage and flood strategies • Transport Strategy and • Conservation Area Appraisals • Local Plan and CIL Viability Assessment • Strategic Housing Market Assessment (SHMA) • Economic and demographic forecasts for Thanet District Council 2013 <p>which have an important bearing on the Local Plan and which ,in the past,have never been circulated for commentary or the subject of Local Consultation in Thanet until the Draft Local Plan is submitted for final examination and are merely presented to Council Members and Committees as absolute factual documents rather than professional advice from hired Consultants .As we all saw at the 'Manston Inquiry' such technical documents may not always be undisputed and need to be in the public arena as soon as possible</p> <p>CPRE Kent Branch believe that all such documents and associated updates and revisions must be available to the Public as soon as they have been accepted for a basis of control of development Planning Policies ,and ,ideally, should be the the subject of consultation The NPPF 2018 stated that "the role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan."It is important in Planning as in any other Council responsibilities that the community should have a view,or views, on viability of Development</p>

Name	Organisation	Comment
		<p>There is no reference in the paragraph to the part that the Community can and should have in the preparation of design codes policies and guides also loosely referred to in Paragraph 2.8 as "other documents "</p> <p>NPPF 2018 states It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers.</p> <p>CPRE consider that if "design codes, policies and guides "are part of Planning Policy they prepare are to be democratically accountable and truly reflect local needs and aspirations, adequate support and guidance also needs to be provided to LPAs from local communities organisations so they can effectively participate in the process and collaborate with other stakeholders involved.</p> <p>Para 2.9 Planning Applications</p> <p>CPRE Thanet supports having a variety of ways on planning applications to ensure that anyone likely to be directly affected by a proposed development has the chance to comment on the application. There is a risk that moving away from 'notices on lampposts', to a solely interactive and accessible map-based online system could reduce accessibility and transparency particularly for those members of the community who are not digitally connected. The aspiration for greater digital is welcomed by our members, and if done well, it could encourage greater public involvement .We need to ensure that more traditional methods of communicating e.g. site notices and face-to-face discussions continue, to complement more digital methods of engagement.</p> <p>CPRE Thanet have been very concerned in the past 2 years by TDC deciding to restrict the circulation of weekly planning application lists to Council Members ,statutory consultees and Parish/Town Councils .We consider that this was a mean minded and unnecessary restriction as circulation by email requires no more than to add an Email address to a file of respondents In the light of the Councils aim (see comments on Chapter 1) to "increase our community involvement " we consider this to have been a reactionary step that damaged the Community'sview of the Council and its commitment to be more transparent and we urge that the Council now reconsiders this matter and reinstates community organisations and Branches of Charities such as our own to be reinstated to the weekly circulation list</p>
Gill Gray - Westgate on Sea Town Council	Westgate on Sea Town Council	Paragraph 2.6, second line down, this should include the addition of the words, Thanet District as it is unclear which Council residents need to apply to.
Helen Scott-Cooper		Please give consideration to use of language and terminology.
Jacqueline Brown - N/A	N/A	I believe Thanet has been saddled with a local plan that is not fit for purpose and has taken the easy option in indentifying prime agricultural

Name	Organisation	Comment
		land that should be left to it's current role of growing food for our nation, to be sold for humungous housing developments. There isn't the local need for this scale of development. The birth rate in Thanet is currently falling so I question that this is to supply home for local people.
Jacqueline Brown - N/A	N/A	<p>I have no confidence this has been carried out effectively by Thanet District Council. Local people are certainly not satisfied that the Transport Strategy and Conservation Area Appraisals are adequate as this is one of the major concerns of local residents the strain on the transport system especially the road network and where all these extra motor vehicles are going to park. I don't think blanketing existing streets with double yellow lines will solve this only add to the problem.</p> <p>The other planning disaster Thanet District Council approved at Westwood Cross is a large contributor to the traffic jams in Thanet and this would only be exacerbated if these huge housing developments on the other side of Thanet at Birchington, Westgate on Sea, Garlinge & Salemstone are passed to go ahead.</p>
Penelope Wells		If your consultations are effective why are many many residents of westgate not aware of housing development plans and many like myself feel concerns about plans to build on Farmland gave been ignored
Richard Thompson - CPRE - Kent Branch Office	CPRE - Kent Branch Office	Paragraph 2.1 - This paragraph is confusing as a Local Plan is a Development Plan Document
samara jones-hall		<p>It states above at Paragraph 2.3 <i>'The Council has to carry out informal and formal consultations in the process of preparing a Local Plan, a DPD or a review of an existing Local Plan. The Local Plan, DPD, or reviewed Local Plan will have to be formally adopted by the Council'</i>. In the interests of transparency and accountability consultations it must be right that consultations must be formal not informal.</p> <p>Please delete the words <i>"informal and"</i> in Paragraph 2.3.</p> <p>This marries up with Paragraph 2.5</p>

Section	Who we will consult	
Name	Organisation	Comment
Barbara Cooper - Kent	Kent County Council	The County Council suggests that reference is made to the need for

Name	Organisation	Comment
County Council		<p>compliance with the Government's accessibility requirements for public sector bodies.¹</p> <p>https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps</p>
Denise Johnson - Birchington PC	Birchington PC	<p>14. The Council supports the statement that arrangements should 'ensure that everybody has the opportunity to get involved with planning decisions to get a good balance of views'.</p> <p>15. Delivering on this statement will be complex and challenging.</p> <p>16. The general list of ways to engage set out in paragraph 3.4 is nonspecific and appears not to be based on any empirical assessment of the effectiveness of methods of communication for the respective groups.</p> <p>17. A clearer assessment of 'hard to reach, hard to hear or seldom heard groups' and proposed communication methods is required to allow meaningful comment.</p>
Gill Gray - Westgate on Sea Town Council	Westgate on Sea Town Council	No comment on this section.
Helen Scott-Cooper		This seems to be aimed at the few rather than the many. Why are consultations not being conducted through, food banks, community groups, community centres
Penelope Wells		How will you measure effectiveness of participation? How have you done this in the past? Do you have evidence of greater engagement due to this SCI ?
Richard Thompson - CPRE - Kent Branch Office	CPRE - Kent Branch Office	<p>Paragraph 3.4 - The sentiment of this paragraph is at odds with the intention to potentially charge an administration fee to process representations on planning matters. That is, it is hard to agree that the Council truly does want to ensure that everybody has the opportunity to get involved with planning decisions when it is also seeking to charge for their right to do so.</p> <p>It is also the case that the charging of any fee, or even the threat of a charge, will clearly further dissuade underrepresented groups from engaging with the planning process.</p>

Section

Table 1 - Methods of Consultation

Name	Organisation	Comment
Barbara Cooper - Kent County Council	Kent County Council	The County Council welcomes the commitment to the increased use of digital forms of communication when consulting with the public, which should improve accessibility of planning consultations. It is recommended that details of social media channels should be included.

Name	Organisation	Comment
		<p>The County Council queries whether there are additional ways to support and reach out to people with protected characteristics and other marginalised or harder to reach communities - for example, through correspondence with faith, voluntary, community and social enterprises and other stakeholder organisations in Thanet.</p> <p>Table 1: Methods of consultation to consider –Leaflet distribution and publishing articles in the local press could be considered as two separate methods. For exhibitions and drop-in sessions, venues should provide reasonable access to all, in line with the Equality Duty 2010.</p>
David Morrish - CPRE Kent Thanet Branch	CPRE Kent Thanet Branch	<p>Chapter 4How we Consult</p> <p>Para4.4CPRE Thanet are extremely concerned with the quite bizarre proposal "<i>Where long and complex representations are submitted on paper or by email, an administration fee may be charged when they have to be entered manually by officers. Based on previous experience, it is anticipated that the vast majority of representations would not be affected by fee charges. In order to avoid any mis-interpretation or mis-understanding of your representations, or administrative charges, we would encourage people to use the online consultation portal themselves.</i></p> <p>It is CPRE Thanet strong opinion that seeking to charge an administration fee to process representations upon planning matters is not only undemocratic but also unlawful.</p> <p>It is not clear as to what power the Council could possibly be relying upon to lawfully make this charge. For example, it can not be Section 93 of the Local Government Act 2003 as this specifically defines discretionary services as those services that an authority has the power but not a duty to provide.</p> <p>On planning matters, Thanet Council will always have a clear statutory duty take into account any representation made to them in response. For Plan making for example, the specifics as to who and how representations can be made are clearly set out within The Town and Country Planning (Local Planning) (England) Regulations 2012. This includes Regulation 2 which states <i>a person may make representations on any matter or document, those representations may be made— (a) in writing, or (b) by way of electronic communications.</i></p> <p>How the Council chooses to administer this in the back office is their choice. They certainly should not however be charging the general public because they have chosen to invest in the wrong consultation software.</p> <p>We would therefore object to the inclusion of paragraph 4.4 within this document. If the Council is minded for it to remain, <u>we would request a clear breakdown of the legal powers being relied upon be reported to members when this consultation is considered.</u></p> <p>Apart from the irritation brought about by such a mean minded proposal aimed unfairly at Local Community Groups ,local Councils and charities such as CPRE and Civic Voice there is the principle to consider set out</p>

Name	Organisation	Comment
		<p>in Para. 5.17 of the 2020 White Paper, there is a proposal that 'The cost of operating the new planning system should be principally funded by the beneficiaries of planning gain - landowners and developers - rather than the national or local taxpayer.</p> <p>Therefore we would suggest that rather than trying to punish local taxpayers for the cost of Planning Appeals, perhaps, could TDC Officers develop a scheme to require Developers to compensate the Local Planning Authority Officer time spent in Public Appeals listening to highly Paid Barristers representing the appellant? Or perhaps that is a suggested skirmish that the Legal Officers may not relish getting into?</p>
Denise Johnson - Birchington PC	Birchington PC	<p>18. The Council agrees that a 'one size fits all' approach to involvement is ineffective and inappropriate, it is agreed that the nature and specificity of the documents in question should determine how involvement is managed.</p> <p>19. The document states that people will be informed by:</p> <ul style="list-style-type: none"> • Online information published on the TDC website and social media. • Mail outs to anyone who has requested notification by email. • Local press adverts. <p>20. The Council accepts that these are valid methods, however they are largely passive and unlikely to attract the interest of anyone without an existing interest or previous involvement in consultation.</p> <p>21. The Council would prefer to see a much more proactive approach beyond formal consultations including:</p> <ul style="list-style-type: none"> • Informative press releases to all local media outlets inviting comments and observations. • Briefing sessions for parish and town councils and other bodies. • Production of briefing packs for use in onward dissemination of key messages. • Leafleting of all households and businesses with plain English explanations of policies and plans. • Regular, 6 monthly, local public accountability meetings hosted by TDC elected members and officers to debate current and forthcoming planning policy and issues. <p>22. Paragraph 4.4 includes proposals to charge fees for certain types of representations submitted to TDC. Such an approach is subjective, unjustified and contrary to TDC objectives for involvement; it may be considered discriminatory, penalising those who can only make representations by email or post.</p> <p>23. The Council believes that public scrutiny of planning policies, proposals and applications should be open to all and not be limited by ability to pay.</p> <p>24. The purpose of Table 1 is not clear. It is a general list of means of communication and observations but does not provide commitment by TDC to use any or all the methods shown. This list would be much more useful if it were combined with the consultations listed in Section 2 and the target audiences mentioned in</p>

Name	Organisation	Comment
		Section 3. That way TDC would be able to meaningfully illustrate how it intends to communicate on different matters with different population groups across Thanet.
Gill Gray - Westgate on Sea Town Council	Westgate on Sea Town Council	The inclusion of a table is welcomed and gives clarity for the methods of consultation considered.
Helen Scott-Cooper		Please read my comments to date on this document. This gives the impression money comes before reaching the whole community.
Ian Shacklock		<p>Will adverts/announcements appear in only one of the local newspapers? If so, then which one? And will it appear in the printed edition or the online edition or both?</p> <p>When announcing policy changes please also put notices in the town hall and in public libraries and on any other publicly accessible noticeboards.</p> <p>Para 4.4 - the idea of charging a fee is an assault on democracy. How exactly would this be implemented? Will the council warn the citizens before charging? Or will the citizens be charged retrospectively?</p> <p>There is too much emphasis on the online portal. It is not always intuitive or convenient. Alternatives must always be supported.</p>
Pamela Smith		<p>This is a general observation based on the fact I do not have any online access. I rely on newspaper articles or word of mouth. Often I find, that dates have passed for any comment to be submitted.</p> <p>This also applies within Cliffsend and the PC seems to rely on computers and there is no attempt at contact with residents.</p> <p>(Of course COVID had made things difficult with staying at home).</p>
Richard Thompson - CPRE - Kent Branch Office	CPRE - Kent Branch Office	<p>It is CPRE Kent Branch office strong opinion that seeking to charge an administration fee to process representations upon planning matters is unlawful.</p> <p>It is not clear as to what power the Council could possibly be relying upon to lawfully make this charge. For example, it can not be Section 93 of the Local Government Act 2003 as this specifically defines discretionary services as those services that an authority has the power but not a duty to provide.</p> <p>On planning matters, Thanet Council will always have a clear statutory duty take into account any representation made to them in response. For Plan making for example, the specifics as to who and how representations can be made are clearly set out within The Town and Country Planning (Local Planning) (England) Regulations 2012. This includes Regulation 2 which states <i>a person may make representations</i></p>

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		<p><i>on any matter or document, those representations may be made— (a) in writing, or (b) by way of electronic communications.</i></p> <p>How the Council chooses to administer this in the back office is their choice. They certainly should not however be charging the general public because they have chosen to invest in the wrong consultation software.</p> <p>We would therefore object to the inclusion of paragraph 4.4 within this document. If the Council is minded for it to remain, we would request a clear breakdown of the legal powers being relied upon be reported to members when this consultation is considered.</p>
Richard Thompson - CPRE - Kent Branch Office	CPRE - Kent Branch Office	<p>Paragraph 4.3</p> <p>CPRE Kent Branch and its members have experienced direct frustration online consultation portal, including many hours work being lost owing to it not saving correctly and cumbersome functionality. You will note our districts offices comment upon this.</p> <p>The Council is under no duty to use bespoke consultation software, particularly if doing so is causing time-consuming back office delays.</p> <p>As CPRE Kent comment upon matters across the County we have direct experience of many different ways of approaching this from the overly complicated third-party consultation databases to simple PDF forms and an email address such as utilised by Dartford Borough Council in their Regulation 19 Local Plan consultation. Our advice would be the simpler approaches are perhaps the better and easier for all concerned and no doubt works out cheaper for the Council and Council taxpayers.</p> <p>Paragraph 4.4</p> <p>It is CPRE Kent Branch office strong opinion that seeking to charge an administration fee to process representations upon planning matters is unlawful.</p> <p>It is not clear as to what power the Council could possibly be relying upon to lawfully make this charge. For example, it can not be Section 93 of the Local Government Act 2003 as this specifically defines discretionary services as those services that an authority has the power but not a duty to provide.</p> <p>On planning matters, Thanet Council will always have a clear statutory duty take into account any representation made to them in response. For Plan making for example, the specifics as to who and how representations can be made are clearly set out within The Town and Country Planning (Local Planning) (England) Regulations 2012. This includes Regulation 2 which states <i>a person may make representations on any matter or document, those representations may be made— (a) in writing, or (b) by way of electronic communications.</i></p> <p>How the Council chooses to administer this in the back office is their choice. They certainly should not however be charging the general public because they have chosen to invest in the wrong consultation software.</p>

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		We would therefore object to the inclusion of paragraph 4.4 within this document. If the Council is minded for it to remain, we would request a clear breakdown of the legal powers being relied upon be reported to members when this consultation is considered.
Rod Giddins		<p>4.2: Please make the most of opportunities to work with partner organisations, especially Town and Parish Councils who can provide local information and perspectives. Documents may also be made available at their offices and their staff or volunteers could help to support TDC with setting up public meetings/exhibitions etc. :</p> <p>4.3: The on-line portal is inadequate for commenting on complex or large scale planning issues so its use should be limited to straightforward matters.</p> <p>4.4: It would be useful if when listing comments/feedback on the portal or in any on-line documents, that these are sub-divided by category of respondent (e.g. stakeholders, businesses, statutory consultees, residents, community organisations). This would make it much easier for the public to view who commented and whether they have a statutory locus or not.</p> <p>Viewing large documents and/or maps and diagrams on-line is often difficult and there must always be an opportunity to view these as paper copies at local venues.</p>

Section	What happens to the comments the Council receives?	
Name	Organisation	Comment
Denise Johnson - Birchington PC	Birchington PC	<p>25. The Council supports the statement that 'it is important to report back to the community and other stakeholders on how their comments and suggestions have been taken on board.'</p> <p>26. The 2012 SCI states 'Anyone who has submitted comments will be contacted by letter or e-mail to inform them in detail of the response to their suggestions and views.'. It is disappointing therefore to find that the 2021 proposal is that TDC 'does not respond to each individual comment, but does respond to common issues that are raised.'</p> <p>27. The Council considers this to be a backward step in accountability and encouragement of public involvement.</p>
Gill Gray - Westgate on Sea Town Council	Westgate on Sea Town Council	There is scope for improved communication following consultations to share the outcomes.
Penelope Wells		<p>What % of thanet residents do you expect to participate in this SCI ?</p> <p>What constitutes an acceptable number</p>

Name	Organisation	Comment
Richard Thompson - CPRE - Kent Branch Office	CPRE - Kent Branch Office	Paragraph 5.1 - It would be recommend that the Council undertake at least some basic analysis of submission document comments as certain matters of legal compliance and duty-to-co-operate issues cannot be rectified once the document is formally submitted.
Rod Giddins		This seems reasonable. However, it is important for consultees to be able to track their comments/representations and to see how these are reflected in reports to Cabinet or Committees (or the Planning Inspectorate) so a method for alerting consultees for tracking their representations needs to be established. So often, we have no knowledge of the timetable for Cabinet/Committees to consider issues despite these being public meetings.

Section	Local Plan-DPDs-SPDs
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Name	Organisation	Comment
David Morrish - CPRE Kent Thanet Branch	CPRE Kent Thanet Branch	<p>Chapter 6 Local Plan Processes</p> <p>Stage 1 Informal Involvement STAGE 1: Evidence gathering and early community involvement - 'front-loading'</p> <p>CPRE Thanet considers that to the list Statutory Agencies, Town and Parish Councils, Mayors Offices, Business Community, Developers, Community Groups, Residents Associations, Traders Associations</p> <p>should be added representatives of Local Branches of registered Charities such as Civic Voice and CPRE Kent for the reason that it should ensure that the "Loudest Voices" (ie the Developers and Land Agents and superannuated Council Officers) do not get the most attention</p>
Denise Johnson - Birchington PC	Birchington PC	<p>28. This section is orientated largely towards 'consultation' rather than 'involvement', the difference between their meanings seems lost on the author. If wider involvement is a genuine objective, then there should be ways in which people are enabled to take part in the process of developing policy rather than simply being consulted about policy that has been largely predetermined.</p> <p>29. The following comments refer to selected stages:</p> <p>a. Stage 1 -Evidence gathering etc - At this stage there should be a 'call for evidence' relating to the matter in hand. The call should be far reaching, widely publicised and supported by the methods suggested; it should not be limited to the audiences set out in the document.</p> <p>b. Stage 2 - Public participation etc - There is a huge gap between evidence gathering and production of a draft document. General public consultation at this stage is not meaningful participation. The interim processes of analysis of evidence, identification of options, option appraisal and identification of preferred</p>

Name	Organisation	Comment
		<p>option(s) should all be transparent activities carried out with community involvement.</p> <p>c. The 'who' and how' sections concerning consultation are weak and non-committal, they should be strengthened and more specific as set out in the Section 4 comments above and modelled on best practice methods.</p> <p>d. Stage 3 - Publication of a Local Plan - The consideration of comments from consultation and how they are determined for inclusion or exclusion should be transparent. Again, this is an area where some form of public involvement in the process is essential to add assurance and credibility to the outcome.</p> <p>e. The 'how' section concerning publicity is weak and unlikely to attract attention.</p> <p>f. Stage 4 - Inspectors Report - The process for deciding whether to accept the Inspectors proposed modifications should be open, the detailed reasons for decisions should be published for each recommendation.</p> <p>g. Stage 4 - Monitoring & Review - The Monitoring Report should be published and presented for scrutiny annually at a public accountability meeting as proposed under Section 4 above.</p>
Gill Gray - Westgate on Sea Town Council	Westgate on Sea Town Council	Useful explanation of the stages involved in planning policy documents preparation.
Helen Scott-Cooper		Am I right in thinking our local plan was imposed due to all the above not producing a result?
Penelope Wells		<p>This section is confusing to a lay person</p> <p>Does it refer to this review of SCI or whole Local plan process ?</p>
Richard Thompson - CPRE - Kent Branch Office	CPRE - Kent Branch Office	Paragraph 6.1 - Suggests that this is re-phrased along the lines of "There are two types of planning policy document - Development Plan Documents, which includes the Local Plan and Supplementary Planning Documents.
Richard Thompson - CPRE - Kent Branch Office	CPRE - Kent Branch Office	Stage 1 - Clearly Local Amenity and Environmental groups, which includes the like of CPRE Kent should be involved in the earliest stages of the process. The wording should be amended so as to reflect this.
Rod Giddins		I would urge the Council to consider extending the time limits for public consultation. Six weeks may be the statutory requirement (ie minimum) but on complex and often technical documents it is insufficient, especially if public meetings/workshops/exhibitions are planned to take place within the six weeks, leaving little real time for representations to

Name	Organisation	Comment
		be submitted. Again, I suggest use of Parish/Town Council venues for documents to be displayed.
Stuart Watson		<p>Thank you for updating your SCI and offering the opportunity to make comments</p> <p>The Stage 2 consultation on Local Plans referred to as regulation 18. Where as it is good to see the Council committing to a approach and time frame for this stage of Plan making perhaps an element of flexibility should be included. The 'The Town and Country Planning (Local Planning) (England) Regulations 2012' don't stipulate a time frame for a regulation 18 consultation or set out the level of detail to be consulted. The regulations only require the 'subject of the plan' to be consulted on. Most Local Authorities has translated this into identifying local issues and options, where are the draft SCI states 'people will have an opportunity to comment on the Council's preferred strategy or consider possible alternatives'. Further, there is no limit to the number of regulation 18 consultations a Council can hold to inform its Plan making as opposed to a Regulation 19 pre submission, It also maybe appropriate to carrying out a shorter Regulation 18 consultation after a main consultation where new matters or policies are identified and appropriate for engagement before regulation 19. Perhaps the SCI should set out a more flexible approach to Regulation 18 along the lines of the Council will engage with residents and stakeholders to identify the main subjects, options and preferred options for the plan for a time period relevant to the depth of matters under considered, with at least one consultation for a minimum of 6 weeks.</p>

Section	Key stages in producing a neighbourhood plan
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Name	Organisation	Comment
Barbara Cooper - Kent County Council	Kent County Council	The County Council would request that it is included as a consultee for the Neighbourhood Planning process.
David Morrish - CPRE Kent Thanet Branch	CPRE Kent Thanet Branch	<p>Chapter 7 Neighbourhood Plans</p> <p>CPRE Thanet wish to repeat the earlier commentary</p> <p>Para 2.5 Neighbourhood Plans .CPRE support the Principle of Neighbourhood Plans and it is with some dismay that we have noted the lack of Thanet Council's enthusiasm for Neighbourhood Plans in recent years revealed by TDC's actions in the withdrawal of specialist assistance to Town & Parish Councils and also the attempt to "torpedo" the Broadstairs & St.Peters Neighbourhood plan -which were actions indicative of a Planning Authority or Planning Officers contempt towards Neighbourhood Planning . This low number of Neighbourhood Plans in Thanet demonstrates the challenge that will exist in trying to front load community engagement at this stage. If our network - one of the most numerous participants in the planning system - thinks it will be hard to engage at this stage, it shows how challenging it will be to engage the wider public.CPRE Thanet hopes that TDC will take this</p>

Name	Organisation	Comment
		opportunity now to convince us that it is really trying hard to "increase our community involvement " (see reference in Chapter1)
Denise Johnson - Birchington PC	Birchington PC	No comment
Gill Gray - Westgate on Sea Town Council	Westgate on Sea Town Council	This is helpful to have key stages explained for producing a Neighbourhood Plan and who is responsible for each step.
Helen Scott-Cooper		I have never been approached or seen advertising to promote neighbourhood involvement. Why is that?
Richard Thompson - CPRE - Kent Branch Office	CPRE - Kent Branch Office	The Council will be aware that Neighbourhood Planning Act 2017 (Commencement No. 3) Regulations 2018) introduced new requirements for the Council to specify directly how they will give advice or assistance throughout the Neighbourhood Plan making process. Whilst the process is set out, the SCI as drafted does not meet this requirement as no information is given as to the extent of advice or assistance that will be provided by the Council to those carrying out the process.
Rod Giddins		The support and active engagement of District Council Planning Officers is critical to the success in developing Neighbourhood Plans. Please can TDC ensure they adequately resource this aspect of work.
Stuart Watson		I'd just like to point out a potential conflict in stage 1. the draft SCI states 'The Council will consult for a minimum of six weeks to ensure that people who live, work or carry on business in the area have the chance to comment.' whereas this statement is correct if the neighbourhood area does not align with a parish council area, if the area does align with a then section 3 of regulation 5 of the The Neighbourhood Planning (General) Regulations 2012 (as amended) states that regulation 6 and 6a (publication for 6 weeks) does not apply. Where a proposed neighbourhood area aligns with a Parish Council boundary then the regulations set out 3 requirements the applicants must provide, boundary map, a statement why the area is considered appropriate for designation and a statement that the organisation or body making the area application is the relevant body (i.e that the Parish Council confirm they are seeking area designation). These three matters should be able to address under delegated authority as it leaves little scope for the Local authority to have grounds for refusal.

Section	Where to get help with planning issues	
Name	Organisation	Comment
Denise Johnson - Birchington	Birchington PC	No comment

Name	Organisation	Comment
PC		
Gill Gray - Westgate on Sea Town Council	Westgate on Sea Town Council	Very useful and welcomed engagement. The details provided are sound reference points with clear contact information.
Richard Thompson - CPRE - Kent Branch Office	CPRE - Kent Branch Office	<p>We note and welcome the inclusion of CPRE Kent.</p> <p>We would however request this be updated to reflect our current branding and correct links etc.</p> <p>We therefore request this be changed to</p> <p>CPRE Kent - the Countryside Charity</p> <p>https://cprekent.org.uk/how-can-i-help/</p> <p>CPRE Kent, Queen's Head House, Ashford Road, Charing, Kent TN27 0AD</p> <p>Tel: 01233 714540 Email: info@cprekent.org.uk Map</p> <p>Assistance available: Advice on how to comment on a planning application, how to challenge a planning decision, local plans and neighbourhood plans. CPRE Kent is a charity that only survives through the support and generosity of its members. If you or anyone you know may like to join CPRE Kent, then please use the form at https://cprekent.org.uk/join-us/</p>

Section	Planning applications and submissions
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Name	Organisation	Comment
Denise Johnson - Birchington PC	Birchington PC	<p>30. Table 2 is a helpful statement of intent. It is noted that TDC proposes some actions beyond the statutory minimum.</p> <p>31. The Council believes that neighbour notification is an important element of the proposals which should be extended in all categories to include those who may be able to see the proposed development and those likely to be affected by traffic, parking or other issues arising from the proposed development.</p> <p>32. The omission of reference in the 2012 document to pre application 'consultation' exercises carried out by landowners, developers and external organisations is a serious omission.</p> <p>33. Where such exercises are carried out the organiser should be obliged to ensure the purpose and status is clear to all those invited to participate. Where intelligence gathered at such events is used to support a future planning application the raw data should be required to form part of the application.</p>
Gill Gray - Westgate on Sea	Westgate on Sea Town Council	It is important that as many mediums of engagement for consultation

Name	Organisation	Comment
Town Council		are utilised to ensure the majority of the community are captured for comments. The Town Council are keen to assist and support with any consultations to promote as widely as possible.
Helen Scott-Cooper		Again the expectation is on the community coming to the local authority rather than the other way around.
Peter Blem		<p>Further to your suggestion that we email you in response to consultation on the above, closing today at 5pm, I was hoping for dialogue and consensus in Facebook from the most vocal objectors to the planning process, but little was forthcoming other than these points:</p> <ol style="list-style-type: none"> 1. The portal needs to allow longer and more complex responses, including attachments such as supporting documents, photos, video etc. 2. All submissions to the planning portal need to remain available online, regardless of consent, subject to the original poster being able to request withdrawal of their own submission for GDPR reasons. "Commercial" to never be an acceptable reason for withdrawal, regardless of whether the plan was approved or not. 3. Search facility within the portal to be improved, so that all users can find patterns and relations between planning applications. <p>As a software developer myself, but not of websites such as TDC's, I do find the website and portal far less capable than it should be. In many ways the previous website was far better at enabling one to finding what one was looking for.</p>
Rod Giddins		<p>Section 9: Table 2: Statutory consultation period of 21 days for planning applications is inadequate for major/complex applications. It would be a testament to the Council's desire to engage effectively with local communities if they agreed a minimum period of 42 days for representations on such applications, irrespective of the statutory minimum period.</p> <p>With regard to consent to display advertisements, although there is no statutory requirement to publicise these (except where they affect a Conservation Area) advertisements can sometimes have an adverse effect on the character of an area and I would like the Council to include these in their weekly press notices giving 21 days to respond.</p>

Section	Review of the SCI	
Name	Organisation	Comment
Denise Johnson - Birchington PC	Birchington PC	34. The Council believes that it is right for the SCI to be kept under review and monitored. Information collected and considered when assessing effectiveness of the SCI should be published together with conclusions and any resultant actions.

Name	Organisation	Comment
Gill Gray - Westgate on Sea Town Council	Westgate on Sea Town Council	<p>The Town Council is of the opinion that larger outline and planning applications should result in the wider community being sent letters to advise of the proposals. At present only the immediate neighbours are consulted and clearly for larger developments there is a wider impact felt by the community. The Town Council advises that the experience with the early consultation has not always been a positive one, so it is hoped that in future this can be more robustly delivered. The following points are for consideration for future community involvement opportunities:-</p> <ul style="list-style-type: none"> • How can they be better communicated • Can the timing of early consultation be improved • Can the delivery of information be more robust • Can the Local Councils be utilised to provide support for alerting hard to reach parts of the community • Can the proportion and scale of an application have an impact in how widely the consultation process is undertaken <p>Thank you.</p>
Helen Scott-Cooper		Not quite the case when involving the whole community, as far as I can see...
Rod Giddins		Presumably the Council could keep the SCI under regular review, learning lessons and taking account of ever-changing technology and making changes without waiting for a five yearly review? This would ensure the consultation procedures were dynamic.

Section		General
Name	Organisation	Comment
Barbara Cooper - Kent County Council	Kent County Council	<p>Appendix 1 - Consultation bodies</p> <p>The County Council welcomes continued engagement with the District Council on planning matters and that reasonable timescales continue to be provided to formulate a response where required.</p> <p>In respect of the County Council's preferred method of consultation, KCC would request that contact and communication is by email (or online as appropriate) as this is the most efficient means of being kept informed and providing comments/feedback.</p> <p>The County Council would welcome any further engagement with the District Council as the SCI is progressed. If you require any further information or clarification on any matter, please do not hesitate to contact me.</p>
Denise Johnson - Birchington PC	Birchington PC	<p>Introduction</p> <p>1. Birchington Parish Council (the Council) is pleased to offer this</p>

Name	Organisation	Comment
		<p>response to the consultation by Thanet District Council (TDC) about its updated Statement of Community Involvement (SCI). The Council hopes that its response, along with all the other responses received by TDC will be carefully considered and reflected in the final document.</p> <p>Summary</p> <p>2. The Statement of Community Involvement is a disappointment.</p> <p>3. It sets sound and promising objectives but fails to fulfil the promise by proposing actions that would be less inclusive and less transparent than those that were last adopted in 2012.</p> <p>4. Involvement is a continuum present throughout a process, consultation is an event that takes place from time to time during a process. This document sets aspirations for broad and meaningful involvement but is focussed almost entirely on consultation. There are no proposals for participation in the development of planning policy or for public accountability, the emphasis is squarely on seeking feedback about policies and proposals that have largely already been shaped and internalised by TDC.</p> <p>5. References to inclusion are not supported by the evidence. There is over emphasis on digital communication which is popular with many, however there is no evidence that it is the most effective means of communicating with a population that is older than average and where there are pockets of high deprivation.</p> <p>6. There is no reference to an equalities and access assessment of the document proposals which would be beneficial supporting information.</p> <p>7. Proposals to introduce fees for processing some submissions are ill considered and unacceptable; if adopted these measures set a grim precedent for a future where only those who can afford to pay will be able to have their full say.</p> <p>8. Plans to abandon individual feedback to those who make submissions are a backward step, failing to take advantage of the benefits that digital technology offers. These reinforce a perception that commenting is pointless because submissions simply disappear into an unaccountable black hole.</p> <p>9. The Council does not support the document in its current form as it fails to offer the people of Thanet improved and meaningful involvement in planning matters.</p>
Geoff Orton - Margate Civic Society	Margate Civic Society	<p>Civic Voice (the National Federation of Civic Societies) brought this consultation to MCS's notice and it was referred to the committee. I am afraid to say that there was little enthusiasm given a prevailing scepticism as to the efficacy of such Statements which are seen as a minimal 'tick box' concession to central government diktat. Nevertheless it would be a dereliction of community obligation not to comment despite a sense of futility surrounding the enterprise which I trust is to be unwarranted so Margate is not 'abdicating'.</p> <p>To summarise the main 'counts on the indictment' hitherto :</p> <p>1 This is a review that is well out of date reflecting the 'tepidity' of TDC's attitude to SCI - the existing Statement is dated 2012 and it should have been reviewed at least by 2017 so there appears to be a 'governance' issue.</p> <p>2 A committee colleague approached the Planning Department on the</p>

Name	Organisation	Comment
		<p>subject - his contact had never heard of SCI which rather underlines the problem.</p> <p>3 As an indicative straw in the wind demonstrating TDC's commitment the distribution of the Weekly List to community organisations was stopped some time ago for no obvious reason except to attempt to deter Planning comments. The proposal to charge fees for objections is plain undemocratic and probably in want of legal justification. TDC confuse inconvenience with vexation.</p> <p>4 Although the initiative to mount Living Spaces Workshops was welcome and progressive there was an inexplicable reluctance to publish timeously the consultants Report - hardly encouraging for the cause of 'community engagement'.</p> <p>5 Similarly TDC ran Heritage Workshops under the tutelage of a distinguished Heritage consultant (Paul Drury) and the consequent Report was never made public even to the attendees - this can only have been because his recommendations did not accord with TDC's preset notions which did not embrace a productive use of disused municipal estate and exploitation of Thanet's considerable archaeological treasure. A subsequent suggestion outlining possibilities with the University of Kent was ignored.</p> <p>6 The Neighbourhood Plan Forum was abruptly discontinued despite there being substantial central government funds available for staff overhead.</p> <p>7 TDC's commitment to 'community engagement' (and 'transparency') was sadly epitomised in its failure to notify the Town Deal Board of the Ministry's Advance Payment offer and its hi-jacking of the sum without consultation. The use of that building is presumably not for the Board's remit and quite probably led to the loss of the former Chair who was unhappy at being regarded as a mere cipher. Given the above lamentable litany one can see why there is a deal of scepticism to be overcome if new leaves are ever to be turned.</p> <p>I attach the SCI for the RB of Kensington & Chelsea which may help to provide a more wholesome policy and would draw particular attention to two initiatives :</p> <p>1 The installation of a 'Listening Panel' to meet on a monthly basis. This would seem excessive for our local purposes and mercifully Thanet has been spared the horrors faced by Kensington's negligence (Grenfell.) However, a quarterly quasi-restoration of the Neighbourhood Planning Forum would be a minimal instrument to ensure that 'early engagement' has any meaning. In Margate itself there is the opportunity through the Town Deal Board to involve the community more closely in the suggested heritage (built and natural) subcommittees and also of course each town will be looking to an early start on the June 2022 Jubilee.</p> <p>2 The commitment to engaging the immediately affected local communities in the application of up to 25% of development monies available from the infrastructure levy. It remains unclear why TDC (unusually in Kent) has not adopted a Community Infrastructure Levy - except of course that developers do not like them but that ought not to be the consideration.</p> <p>I have asked Civic Voice for any examples of Best Practice SCIs and if any are forthcoming I shall of course be sure to forward them for</p>

Name	Organisation	Comment
		<p>consideration. It is to be hoped that Thanet District Council will mend its ways though I am aware that there is a growing movement for council consolidation (most recently in Northamptonshire) with a consequent imperative to strengthen involvement at the 'grassroots'. What I will say is that Thanet's draft SCI is better than Dover's in that it does usefully detail sources of further information so thank you for that.</p>
Neil Prett		<p>The Government have messed up with the local planning with the algorithms.</p> <p>They now want more houses to be built in the North. Hopefully this will mean less building on our green fields?</p> <p>The Council have now got to sell derelict sites and brown field plots. Think water, doctors, schools, hospitals, food.</p>
Sharon Jenkins - Natural England	Natural England	<p>Thank you for your consultation request on the above dated and received by Natural England on 23rd February 2021.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications.</p> <p>We regret we are unable to comment, in detail, on individual Statements of Community Involvement but information on the planning service we offer, including advice on how to consult us, can be found at: https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals.</p> <p>We now ask that all planning consultations are sent electronically to the central hub for our planning and development advisory service at the following address: consultations@naturalengland.org.uk. This system enables us to deliver the most efficient and effective service to our customers.</p>
Tamzyn Janes - Southern Water	Southern Water	<p>Thank you for inviting Southern Water to comment on the updated Statement of Community Involvement.</p> <p>We have reviewed the document and have no comments.</p> <p>Please keep us informed of progress.</p>

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