

Statement of Community Involvement Public Consultation - Summary of Main Issues, Councils Response and Resulting Changes to the SCI

Summary of issue	Response	Proposed Change
Chapter 1 - Why is the Statement of Community Involvement being reviewed?		
<p>The Council should embrace the concept of the SCI for all of its services</p>	<p>The Statement of Community Involvement is a specific requirement of the local plan process and not necessarily applicable to wider council services.</p> <p>The council is committed to communicating openly with Thanet’s communities and to involving communities in the design and review of its services, using the most appropriate means relevant to the issue or service.</p>	<p>N/A</p>

<p>The Council should engage with communities in their communities, rather than communities having to go to the Council</p>	<p>Part of the Local Plan consultations included drop-in sessions in Margate, Birchington, Westgate, Ramsgate, Broadstairs, Westwood and Minster. However it would help to clarify in the SCI that drop in sessions will be held in a variety of places.</p>	<p>Amend Table 1, column 2 (relating to exhibitions/drop in sessions) as follows:</p> <p>Provides an opportunity for two way dialogue. Provides opportunities for consultation events to be held in a variety of locations within the district. Accessible to broad audience</p> <p>Add the following to column 3: Availability and suitability of venues in various locations</p>
<p>The SCI Review is overdue</p>	<p>In 2017, the Local Plan was at an advanced stage in the Local Plan process, with its submission for independent examination scheduled for 2018. That year, Council received a letter from the Secretary of State regarding his concerns about delays in our local plan process. The Council was working to extremely tight deadlines to keep to the Local Plan timetable - reviewing the SCI at this time would have delayed the Local Plan process.</p>	<p>N/A</p>

	<p>As part of the Examination process, the Inspectors consider whether or not Local Plan consultations have been carried out in accordance with the SCI. As the 2012 SCI was the relevant SCI for the majority of the Local Plan consultations, it was appropriate for it to remain in place until after the Examination. In the Statement of Consultation submitted to the Local Plan Examination, it states that the methods set out in the 2012 SCI were still relevant. Those methods of consultation are still considered relevant and have been included in this SCI review.</p> <p>In their report, the Examination Inspectors noted the requirements of the SCI, and concluded that the draft Local Plan met all the legal requirements, including for consultation. However, before embarking on the update of the Local Plan, it was considered necessary to review the SCI.</p> <p>The Council will continue to use a variety of methods for public consultations, including traditional methods as well as new online methods</p>	
<p>Chapter 2 - What we will consult on</p>		

<p>Please give consideration to use of language and terminology.</p>	<p>The Council uses 'plain English' as far as possible in publicity materials, adverts and information about consultations. However Planning Policy documents, once adopted, have a legal status so the language and terminology used may not be as easy to read or understand.</p>	<p>N/A</p>
<p>Have previous consultations been effective? Comments that people have not heard about consultations or aware of issues proposed in the Local Plan.</p>	<p>During the Local Plan process, the Council used a number of methods for its public consultations including adverts in local newspapers, information on social media, drop-in sessions, public meetings and making documents available in local libraries. A summary of the consultations including people who attended drop-in sessions and numbers of comments received was reported to the Local Plan Inspectors in the Statement of Consultation.</p>	<p>N/A</p>
<p>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</p>	<p>Agree this would make it clearer</p>	<p>Amend para 2.6 as follows: 2.6 A Neighbourhood Development Order means that town and parish councils can grant permission for certain types of development without the need for people to apply to the Thanet District Council for planning permission</p>
<p>Paragraph 2.1 - This paragraph is confusing as a Local Plan is a Development Plan Document</p>	<p>Agree</p>	<p>Amend paragraph 2.2 as follows: The Council can also produce other 'Development Plan Documents' (DPD) to include planning policies that sit alongside</p>

		Local Plan policies (e.g. the Cliftonville DPD)
The Council should consult on other documents that form the evidence base for the Local Plan	The Council made every effort to publish evidence base documents as soon as it was able. Many of these documents were published before the submission of the Plan to Examination, and some people did comment on the documents as part of their responses to the draft Plan.	N/A
Restricting the circulation of weekly planning applications lists does not aim to increase community involvement.	The primary purpose of the weekly list is for members to be notified in accordance with the Council Call in procedure. The Council's online planning public access has the ability to generate weekly list specific to individual areas, available here: https://planning.thanet.gov.uk/online-applications/search.do?action=weeklyList Also residents or groups can sign up through sign up to automated notification when applications are received within a prescribed radius of sites. This is available here: https://planning.thanet.gov.uk/online-applications/registrationWizard.do?action=start	N/A
It states above at Paragraph 2.3 '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	Agree that para 2.3 could be worded better. The council is only required to carry out formal consultations on Neighbourhood Plans as engagement/involvement in carried	Amend first sentence of para 2.3 as follows: The Council will engage and involve communities as well as carrying out has to carry out informal and formal consultations in

<p>Local Plan. The Local Plan, DPD, or reviewed Local Plan will have to be formally adopted by the Council'. 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 "informal and" in Paragraph 2.3.</p> <p>This marries up with Paragraph 2.5</p>	<p>out by the Town or Parish Council preparing a Neighbourhood Plan</p>	<p>the process of preparing a Local Plan, a DPD or a review of an existing Local Plan</p>
<p>Chapter 3 - Who we will consult</p>		
<p>Reference should be made to the need for compliance with the Governments accessibility requirements.</p>	<p>Agree</p>	<p>Add to para 3.4: All online documents produced by the Council will meet the requirements of the Government's accessibility requirements (https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps)</p>
<p>Chapter 4 - How we will consult</p>		
<p>Comments relating to difficulties using the online portal, particularly with large or complex documents or maps and diagrams.</p>	<p>The Council appreciates that some of the consultations are complex and is continually looking for ways to improve and simplify online consultations. We have added links to each chapter to help people find the section they would like to comment on, and also provided instructions for some consultations.</p>	<p>Add the following to the end of para 4.4: The Council may prepare a step by step guide on how to respond to some consultations, and for any consultation officers will be available to help people use the online system.</p> <p>Amend Table 1 to include making the online</p>

	<p>The Council will continue to provide paper copies of consultation documents for consultations on planning policy.</p> <p>The council will provide assistance in using the online consultation system - the SCI should be amended to reflect this.</p>	system available at drop in sessions.
There should be more dialogue/briefings with Town and Parish Councils	Agree	Amend Table 1 - Methods of Consultation as set out in Appendix 1
Wider distribution of leaflets/publicity material - every household/more public notice boards/community places eg food banks, community centres, notices in town halls and libraries. Not everyone has internet access.	Distributing publicity materials to every household would incur high costs in both printing and postage. However, agree that materials could be more widely distributed.	Amend Table 1 - Methods of Consultation as set out in Appendix 1
Table 1 - Methods of Consultation is non-specific and non-committal	Paragraph 4.6 of the SCI explains that the methods set out in Table 1 are methods the Council could use depending on the nature of the consultation. However this could be made clearer in para 4.6	Amend para 4.6 as follows: The Council will use an appropriate combination of methods one or more of the methods identified as being appropriate , depending on the type, nature, context and stage in the process of the consultation concerned.
Charging an administration fee to process representation is unlawful and unreasonable	<p>This was suggested as Council officers input a significant amount of representations received by post or email:</p> <p>Preferred Options Consultation - 59% of responses entered by officers</p> <p>Proposed Revisions Consultation - 35% of responses entered by officers</p> <p>Pre-Submission Consultation - 39% of responses entered by officers</p> <p>Proposed Modifications Consultation - 75%</p>	<p>Amend para 4.4 as follows:</p> <p>4.4 Council officers will enter all comments received by email or post into the online consultation portal to make it easier for us to assess responses, publish the results of a public consultation, and send comments to Inspectors/Examiners at the independent</p>

	<p>of responses entered by officers.</p> <p>The idea of charging was aimed at large or complex responses which include large documents with graphics and volumes of appendices which all need to be transferred into the consultation portal. However the Council accepts that the inclusion of this may deter some people from responding, and that was not the intention.</p>	<p>assessment stage. Inputting comments into the online portal relies on the interpretation of them by Council officers. This can be very time-consuming and cause delay to the Local Plan process. 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.</p>
<p>Are there 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>For exhibitions and drop-in sessions, venues should provide reasonable access to all, in line with the Equality Duty 2010.</p>	<p>This is our current procedure as set out in para 3.4 of the SCI.</p>	<p>N/A</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>Formal public notices and adverts are placed in the Kent Messenger - both printed and online.</p> <p>Press releases are sent to a much wider distribution including the Isle of Thanet Gazette, Thanet Extra, Isle of Thanet News, Kent on Sunday, Thanet Community Ad, ITV Meridian, BBC South East, BBC Radio Kent, Heart FM and Academy FM.</p> <p>An amendment could make this clearer.</p>	Add to third point under para 4.1: Formal notices and adverts will be placed in the Kent Messenger, press releases will be sent to a much wider distribution including the Isle of Thanet Gazette, Thanet Extra, Isle of Thanet News and Kent on Sunday
Chapter 5 - What happens to the comments that the Council receives?		
The Council should respond to individual comments rather than common issues. Cabinet/Committee dates should be publicised when representations and responses will be considered by councillors.	<p>The planning policy process seeks to address the main issues raised during consultations rather than responding to each individual comment. This was introduced to reflect the requirements of the Planning Inspectorate at Reg 19 stage (as set out in the Inspectorate's Procedure Guide). It also helps to speed up the planning policy process.</p> <p>The Council will email or write to people who have commented during a consultation to let them know when the main issues and responses are available on the consultation portal.</p>	N/A
Paragraph 5.1 - It would be recommended that the Council undertake at least some basic analysis of submission document	This relates to a more detailed part of the independent Examination process. The reference in the SCI is to clarify that any consideration of representations and	N/A

<p>comments as certain matters of legal compliance and duty-to-co-operate issues cannot be rectified once the document is formally submitted.</p>	<p>subsequent changes made after that consultation are not decided by the Council.</p>	
<p>Chapter 6 - Local Plan/DPDs/SPDs</p>		
<p>The Regulation 18 stage should have a more flexible approach as there is no limit to the number of Regulation 18 consultations a Council can hold. Suggested wording: 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>	<p>Agree</p>	<p>Amend Stage 2 as follows: Draft planning document produced – people will have an opportunity to comment on the Council's preferred strategy or consider possible alternatives</p> <p>Identification of main subjects, options and preferred options.</p> <p>Who? General invitation for people to make representations giving at least 6 weeks for people to comment</p> <p>The Council will engage with residents and stakeholders for a time period relevant to the depth of matters under consideration, with at least one consultation for a minimum of 6 weeks</p>
<p>The Council should consult for longer than 6 weeks even though this is the statutory minimum requirement.</p>	<p>The Council will consult for longer than 6 weeks depending on the depth and complexity of the subject of the consultation, stage in the planning process or time of year. The Regulation 19 consultation must be for a</p>	<p>N/A</p>

	<p>period of 6 weeks as set out in the Town and Country Planning Regulations 2012 (Regulation 35) and Section 113(4) of the Planning and Compulsory Purchase Act 2004.</p>	
<p>8. 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>Agree that Stage 1 could be amended to make this clearer</p>	<p>Amend Stage 1 as follows:</p> <p>Who? Targeted consultation and engagement with some or all of the following: Local residents, Statutory Agencies, Town and Parish Councils, Neighbourhood Plan groups, Mayors Offices, Business Community, Developers, Community Groups, Residents Associations, Traders Associations</p>
<p>Comments that this section is confusing as it's not clear if it refers to the SCI or the whole Local Plan process, and that the content is vague and non-committal.</p>	<p>The purpose of this section is to outline the processes for producing planning policy documents and where in those processes people can be involved. It does not refer to the SCI review. The content is to give an idea of the consultations which will take place at</p>	<p>N/A</p>

	various stages - the greater detail as to who and how is explained in greater detail in earlier chapters.	
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	Agree	Amend para 6.1 as follows: There are two types of planning policy document - Development Plan Documents, which includes the Local Plan Documents and Supplementary Planning Documents
Chapter 7 - Neighbourhood Plans		
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	Agree - this is a factual correction	Amend Stage 1 as follows: The Town or Parish Council apply to the Council for a specific geographic area to be designated to which the Neighbourhood Plan will apply. In Thanet the Neighbourhood Area is usually the Parish or Town boundary, in which case the Council will designate the Neighbourhood Area. If the proposed Neighbourhood Area does not align with a Town or Parish boundary 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. The Neighbourhood Area is then either approved or refused by the Council within the time limit specified in the Neighbourhood Planning Regulations and the outcome publicised as required under the

<p>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.</p>		<p>legislation. In areas where there is not a Town or Parish Council, those wishing to prepare a Neighbourhood Plan can establish a Neighbourhood Forum which must have a minimum of 21 Members. They must apply to the Council to designate a forum and the Council must consult on this. Where possible, the Council will carry out consultations for a Neighbourhood Forum and a Neighbourhood Plan Area at the same time.</p>
<p>The SCI should specify how the Council will give advice or assistance throughout the Neighbourhood Planning process.</p>	<p>Agree</p>	<p>New paragraph 7.6: The Council will actively engage with Neighbourhood Plan groups, subject to resources, and provide advice and assistance on the following:</p> <ul style="list-style-type: none"> ● The legal procedures and conformity matters ● The scope of a neighbourhood plan ● Related local plan and planning policy documents and up to date information on the Local Plan ● Requirements of other legislation such as Human Rights Act, the Habitats Regulations and Strategic Environmental Assessments ● Any updates on funding or grants available ● Relevant Local Plan evidence base <p>The Council will also fulfil its statutory</p>

		<p>duties in the Neighbourhood Plan process:</p> <ul style="list-style-type: none">● Confirm that the draft plan meets the criteria in the Localism Act and Regulation 15 of the Neighbourhood Planning Act 2012. The Local Planning Authority can refuse to take forward a plan proposal if it does not comply with the criteria for a neighbourhood plan. The Local Planning Authority must notify the Qualifying Body (ie a Town or Parish Council or a Neighbourhood Plan Forum) whether or not they are satisfied that the proposal complies with the criteria for a neighbourhood plan. Where it is not satisfied the Local Planning Authority can refuse and must notify them of the reasons. It must also publicise its decision in a 'Decision Statement'.● Publicise the submission plan and other relevant documentation (under Regulation 16 of the Neighbourhood Planning Act 2012) and pass on representations to the Independent Examiner under Regulation 17 of the Neighbourhood Planning Act 2012.
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		<ul style="list-style-type: none"> ● Appoint a suitable examiner in agreement with the Qualifying Body and submit the draft plan, supporting documents to the Independent Examiner under Regulation 17 of the Neighbourhood Planning Act 2012. ● Consider the recommendations in the Examiner’s Report, that the draft plan meets the basic conditions and publication of a ‘Decision Statement’ under Regulation 18 and 19 of the Neighbourhood Planning Act 2012 following the receipt of the inspectors report. ● Make arrangements, including the setting of a date, for the holding of the referendum. ● Adopt the plan under Regulation 19 and 20 of the Neighbourhood Planning Act 2012, within 8 weeks of a positive referendum vote.
<p>Can the Council ensure they can adequately resource the necessary support and assistance for neighbourhood planning</p>	<p>For 12 months, the Council had sufficient resources to employ an officer whose primary focus was supporting Neighbourhood Plans. Unfortunately, in that time, only one NP made significant progress.</p>	<p>N/A</p>

	The Council did extend the role for a further 6 months, but at the end of that period had to discontinue the role due to resource constraints. The Council will continue to provide advice within the resources it has available.	
Chapter 8 - Where to get help with a planning issue		
<p>CPRE reference needs updating with the following details:</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>	Agree - this is a factual update	Update Section 8 with the details provided
Chapter 9 - Planning Applications and Submissions		
Chapter 10 - Review of the SCI		
The SCI should be kept under review and updated more regularly than every 5 years	The methods and detail in the SCI are flexible to enable the council to adapt to current circumstances or lessons learnt from previous consultations and still be in accordance with the SCI. More frequent reviews of the SCI could hold up the planning	N/A

	policy process as reviews are consulted on and adopted by Council	
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Additions to Table 1 - Methods of Consultation			
Method	Useful for:	For us to consider:	Resources:
Add the following row to Table 1: Involvement of Town and Parish Councils	Understanding issues from a more local perspective, briefing for dissemination to the wider community	Method of engagement appropriate to the consultation - eg briefing for all Councils online or face to face, all councils together or separately. Potential to work with town/parish council for local consultation events	Staff availability
Advert/leaflet/ posters in Local Papers, town/parish halls/libraries/other community spaces	Raising levels of awareness and publicising specific opportunities to get involved. Reaching a wider audience	The timescale needed to ensure availability at the beginning of a consultation period	Costs of advertising/printing/delivery
Exhibitions/Drop in Sessions	Provides an opportunity for two way dialogue. Accessible to broad audience	Information should be accessible to all in terms of mobility, understanding and times available. Availability of resources/equipment to make the online consultation system available at venues	Preparation costs, display materials and time needed can be significant. Additional staff time needed if exhibition is manned. Venue costs for hire.