

**APPENDIX B**  
**COUNCIL'S PROPOSED CHANGES**

## **Appendix C**

### **Summary of representations received, the Council's responses to those representations, and suggested changes to the SCI in light of the representations**

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#### **The Countryside Agency (ref: 28/01)**

##### *Summary of representation*

The revised document is more approachable and clearly laid out. The document is sound and the Council has identified sufficient mechanisms for consulting their community. Understand and welcome the need to be flexible in approach depending on the target group.

##### *Council officer response*

Support noted. **No change to the SCI necessary.**

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#### **Brian Gaff (ref: 28/02)**

##### *Summary of representation*

Considers the SCI unsound, failing test of soundness 5.

When long documents are published audiotape is hard to use, though a summary document on audiotape would be helpful. Many people don't have access to web based information. Responses to consultation documents would probably need to be over the telephone rather than in writing.

There needs to be consultation with someone who understands visual impairment issues on planning applications that affect the public realm.

##### *Council officer response*

Regarding planning applications the objector is asking that someone with knowledge of visual impairment issues be consulted on all development that affects the public realm. Unfortunately this is unrealistic, but at paragraph 9.9 the SCI does state that for large scale and controversial proposals the Council can make use of the Kingston Disabled and Older People's Forum, and there will be a press release via the Talking Newspaper. In addition, in section 9 the SCI already requires developers of large scale proposals defined at paragraph 9.4 to engage the community including hard to reach groups. Applicants are also required to submit an 'Access' statement with their planning applications helping the Council assess the extent to which the development is accessible. **No change to the SCI is suggested in response to this aspect of the representation.**

Regarding the LDF, the advice from the directorate's Customer Care Team is to publish documents on audiotape, notwithstanding the difficulties when dealing with long documents. The SCI could be clarified in this respect. Also it is accepted that the visually impaired may need to respond verbally rather in writing.

*Suggested change to SCI*

**Page 10, Section 5, Paragraph 5.8**

Add a new sentence to the end of paragraph 5.8 as follows: “Documents in the Local Development Framework will be put onto audiotape on request, as will summary documents which are shorter and therefore more usable on tape. If a person cannot respond in writing to a consultation document then verbal comments, for example over the telephone, can be carefully recorded and having been checked with the respondent be treated as formal representations”

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**Surrey County Council (ref: 28/03)**

*Summary of representation*

Consider the consultation arrangements in the SCI to be adequate provided that major applications likely to affect planning and transportation interests in adjoining parts of Surrey, including major proposals within Town Centres and sites adjacent to Surrey, are subject to regular consultation.

*Council officer response*

**No change necessary to the SCI.**

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**Thames Water (ref: 28/04)**

*Summary of representation*

No test of soundness identified.

Thames Water (as sewage and water undertaker for Kingston) are ‘specific consultation bodies’ and must therefore be consulted prior to the publication of a first draft Development Plan Document (DPD). When consulting Thames Water, adequate time should be allowed so that an informed response can be formulated. Thames Water will sometimes also need to consult with the Environment Agency, and time needs to be factored into LDD project plans to allow for this.

Thames Water would expect to be consulted on most major planning applications at the earliest possible to stage and reference to this should be added to section 9 of the SCI.

*Council officer response*

Water and sewage undertakers are mentioned in Annex 3 of the SCI as being specific consultation bodies for Kingston and Thames Water will therefore be involved in the production of Local Development Documents at the early stages (Reg 25) onwards in accordance with the Regulations. Thames Water is currently consulted on major applications in the borough at the address stated in the representation. **No change is suggested to the SCI.**

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**Mr Graham Smith (ref: 28/05)**

*Summary of representation*

Considers the SCI to be unsound, failing tests of soundness 6 and 8.

The SCI should include better mechanisms to involve 'hard to reach groups'. Publicity in newspapers and shop windows is insufficient. There is too much emphasis on interested parties having to seek out information. 'Livin' Kingston' does not reach all residents. Libraries must have more terminals to allow residents to access Council website and plans must be available for 'paper' inspection at libraries. The Council must be more proactive. It is not enough to rely on local groups to contact the Council.

***Council officer response***

The Livin' Kingston magazine should be distributed to all households in the borough. Mr Smith's contact details have been passed on the communications team to check why copies have not been received.

The Council's weekly list of all applications validated and decided are sent to all the libraries as are paper copies of all full planning applications including plans. Hard copies of all consultation drafts and adopted versions of Local Development Documents are made available at all borough libraries.

Regarding the number of terminals in libraries this is not an issue for inclusion in the SCI but for information the following response has been received from the Council's library services:

*There are government standards for public libraries called Public Library Service Standards (PLSS). PLSS 4 is 'Total number of electronic workstations per 10,000 population'. The standard set is 6 public access computers per 10,000 population. Kingston meets this target. At the end of 2006 the Hook Centre will open. The building contains a new, larger library. This will provide 18 additional computers for the public.*

**No change is suggested to the SCI in response these points.**

Regarding the wider issue of publicity raised in the representation, the Council has limited resources which must be targeted, and appropriate techniques used depending on the issue. It is considered that the measures set out in this SCI (which will be the Council's *minimum* standard) are generally appropriate and that it builds in sufficient flexibility to adapt techniques depending on resources available and the issue to be consulted upon. However, it is accepted that the SCI could be improved with respect to site allocations in the LDF. The SCI should ensure that neighbours and others directly affected by a site allocation are notified in a similar way as if the site was the subject of a planning application. It is suggested that the SCI be changed so that anyone directly affected by a site allocation in a Development Plan Document should be notified, certainly at Preferred Options, submission and adoption stages.

***Suggested change to the SCI***

**Paragraph 6.7 (vi)**

Contact any other organisations or individuals that the Council considers should be involved in the consideration of the Preferred Options document. This ~~may~~ will

include occupants of these properties that the Council considers to be directly affected by a potential site allocation.

**Paragraph 6.9 (viii)**

[In addition the Council will...] Contact any other organisations or individuals that have been involved in previous stages of consultation or which the Council considers should be involved in the consideration of the submission DPD. This will include occupants of properties that the Council considers to be directly affected by a site allocation.

**Additional methods the Council will consider:**

- i. An article in its quarterly magazine 'Livin' Kingston' if the publication date is suitably timed.
- ii. Advertising in local newspapers, Talking Newspaper and local radio;
- iii. ~~Writing to those directly affected by a policy or proposal, e.g. neighbours to a site allocation.~~

**Paragraph 6.15**

A copy of the adopted DPD, and the Inspector's report, will be made available for inspection at Guildhall 2, at all local libraries, Chessington and New Malden Helpdesks, and on the Council's website. A notice will be placed in the Surrey Comet, and the Council will notify anyone who as asked to be notified of adoption. The Council will also issue a press release to local newspapers and the Talking Newspaper that the DPD has been adopted, and will consider alternative means of publicising the DPD as appropriate, including an article in the Council's Livin' Kingston magazine. The Council will notify occupants of properties that the Council considers to be directly affected by a site allocation.

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**Liz Trayhorn, Healthy Kingston Co-ordinator, Kingston Primary Care Trust (KPCT)/Royal Borough of Kingston (ref: 28/06)**

***Summary of representation***

Considers the SCI to be unsound (no test of soundness identified).

Two issues raised:

- 1) Reference to 'health authorities' in para 9.10 should be replaced by 'health bodies'.
- 2) KPCT needs to be consulted both on developments related to health care provision and health facilities as well as those which may may impact on the health of the borough's residents. This would include major developments related to, for example, alcohol, diet, transport, crime, education and housing. In these circumstances KPCT's public health directorate (soon to be joint with Royal Borough of Kingston) should be consulted.

***Council officer response***

Agree that the SCI should refer to health bodies rather than health authorities. Also accept the point that the Council should consult KPCT not only on applications that relate to health care provision and facilities but major developments that could have wider health implications.

***Suggested change to SCI***

1) Amend 4<sup>th</sup> line of para 9.10 to read health bodies rather than health authorities.

2) Page 23, section 9, para 9.10

As well as notifying the properties affected by a proposal, the Council will consult adjoining authorities and other organisations such as the Environment Agency, the health bodies, the Police and infrastructure providers when proposals are considered to affect their interests. ~~Various other organisations such as the Environment Agency, the Health Authorities and the Police will also be consulted on certain applications relevant to their interests.~~ It is recognised that service providers such as the health bodies and police are likely to be interested in the wider implications of more significant developments as well as in planning applications for new facilities from which service provision is based.

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### **Government Office for London (ref: 28/07)**

#### ***Summary of representation***

Add reference to the Department for Communities and Local Government to Annex 1.

#### ***Council officer response***

Agree.

#### ***Suggested change to SCI***

Annex 1 – replace existing text on ODPM with new text on DCLG as follows:

#### **~~Office of the Deputy Prime Minister (ODPM)~~**

~~[www.odpm.gov.uk](http://www.odpm.gov.uk)~~

~~ODPM is responsible for Government policy on housing, planning, devolution, regional and local government and the fire service. It also takes responsibility for the Social Exclusion Unit, the Neighbourhood Renewal Unit and the Government Offices for the Regions~~

~~[www.dclg.gov.uk](http://www.dclg.gov.uk)~~

~~DCLG is the successor department to the Office of the Deputy Prime Minister (ODPM). It is an expanded department with a powerful new remit to promote community cohesion and equality, as well as responsibility for housing, urban regeneration, planning and local government.~~

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### **Ms Rosalind Graham Hunt (ref: 28/09)**

#### ***Summary of representation***

Considers the SCI to be unsound, failing tests of soundness 1-9.

The representation makes no specific references to the content of the SCI. Instead this representation focuses on specific issues around plans for the re-development for the Quaker Meeting House in Kingston Town Centre, expressing concern at the treatment of Quakers as a religious group.

#### ***Council officer response***

The lead officer on the Kingston Town Centre Area Action Plan (K+20) has written to Ms Hunt reassuring her that that role of and provision of community, religious and faith facilities is being given proper consideration as part of the LDF process. The response further explained that discussions are currently taking place to see if there are any suitable alternative sites or buildings, which would meet the requirements of the Quakers and provide a suitable facility for them, as well as enabling the comprehensive development and improvement of the area. **No change is suggested to the SCI.**

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**The Environment Agency (ref: 28/10)**

***Summary of representation***

Consider the SCI to meet the basic procedural, conformity, and coherence test.

***Council officer response***

Noted. **No change necessary to SCI.**

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**Elmbridge Borough Council (ref: 28/11)**

***Summary of representation***

Representation makes reference to an error in the Regulation 28 statement. Elmbridge Borough Council is wrongly listed as a Elmbridge District Council in Appendix A.

***Council officer response***

Accept that Elmbridge Borough Council is wrongly listed in the Regulation 28 statement, however this list does not form part of the submission version SCI and therefore **no change to the SCI is necessary.**

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**Nathaniel Lichfield (Morley Fund Management) (ref: 28/12)**

***Summary of representation***

Confirms that they wish to continue being consulted on LDF documents produced by Kingston Council.

***Council officer response***

Nathaniel Lichfield (Morley Fund Management) will continue to be consulted on the LDF. **No change necessary to the SCI.**

## Appendix E

### Additional minor changes to the SCI suggested by the Council to improve the wording of the document

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#### Paragraph 5.3

A change is suggested to paragraph 5.3 deleting reference to contacting people in their preferred format. This reference is also made in paragraph 5.7 where it would seem to be more appropriate. Deletion at paragraph 5.3 would avoid repetition.

#### Involving ‘hard to reach’ groups

5.3 A key challenge is engaging those groups that tend to be ‘hard to reach’ in order to get a representative set of views. Consultation should be inclusive, recognising the diversity of people who live in the Borough. ~~In particular, care should be taken that people are contacted using their preferred format, where this is known, wherever possible.~~ In the terms of the Council’s equal opportunities policy “Putting People First” this means “*Working to increase public participation in the local democratic process and ensuring that the views and voices of all communities in Kingston are heard.*”

**Reason for change:** This change would avoid repetition.

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#### Paragraph 6.6

Two changes are proposed, one to criterion (i) and one to criterion (vii) as follows:

6.6 At the ‘Issues and Options’ stage the planning regulations do not require the Council to involve the public. However, anyone who has not been contacted but wishes to comment can do so by writing or emailing the Planning Department. The Council will consider extra measures to involve the community depending on the document being produced and the resources and time available. In particular it is likely to:

- i. Publish an ‘Issues and Options’ paper, ~~perhaps~~ with a questionnaire as a basis for ~~stakeholder engagement and/or~~ wider public involvement. As a minimum this would be available on the web, in the Council’s offices (Guildhall 2), Chessington and New Malden Helpdesks, and at local libraries;
- ii. Put information on the council website, including the disability and access pages, use the ‘Young Livin’ website, and invite comments to be made electronically;
- iii. Include an article in the Council’s Livin’ Kingston magazine;
- iv. Issue a press release to the local newspapers, Talking Newspaper and local radio;
- v. Advertise in the local newspapers, Talking Newspaper and on local radio to guarantee coverage;
- vi. Invite views from all individuals, businesses or organisations on the LDF consultee database;
- vii. Put questions to the Residents Panel and/or draw a focus ~~group~~ from it;
- viii. Meet with representatives of community groups, using existing forums where possible;

- ix. Meet with the Kingston Community Leadership Forum (the Local Strategic Partnership for Kingston) and its subsidiary 'theme' groups;
- x. Consider holding public events, such as public meetings, exhibitions or workshops, providing adequate publicity for these, for example using letters, leaflets, press releases, local radio.

**Reason for change:**

Criterion (i) - A questionnaire may be appropriate to accompany an Issues and Options Paper but equally it may not. Also, the issues and options paper could be used only for stakeholder organisations at the issues and options stage, not necessarily for wider public involvement.

Criterion (vii) – the word 'group' was omitted from the sentence.

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**Paragraph 9.5**

Delete the struck through number 3 which is a typographical error.

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