STATEMENT OF COMMUNITY INVOLVEMENT
(ADOPTED, JULY 2005)

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1 Introduction

1.1 This document sets out the Council's strategy for community involvement in the planning process. It outlines how the Council plans to establish common ground with the community, promoting consensus on the form and content of the Local Development Documents that will be produced to form the Local Development Framework and how the community will be involved when the Council receives major planning applications. This document is set out in two parts. The main body of the document forms the Council's Statement of Community Involvement and the second part, the appendices at the back, sets out supplementary information relating to the specific detail of the Council's community involvement strategy. The appendices do not form part of the statutory Statement of Community Involvement.

1.2 The Council has, in the past, followed its statutory duties to consult with members of the public and statutory bodies in the planning process, but the Planning & Compulsory Purchase Act (2004) sets out new standards and encourages a more comprehensive and inclusive approach to community involvement.

1.3 Research has shown that more comprehensive involvement of the community in the planning process has several benefits. These benefits include improved decision making, and greater ownership by the local community of the policy framework that shapes the future of the area. It can also result in speedier decisions, as issues can be resolved at an early stage.

2 The Role of Community Involvement in Preparing a Sound Plan

2.1 The Borough Council is committed to ensuring that the views of the community are incorporated as far as is possible into the policy framework that guides development in the Borough. Community involvement will ensure that the plan is sound and creates opportunities for the whole planning policy process to be more inclusive. Issues can be identified and debated at the earliest opportunity with the aim of resolving any conflicts that may arise.

2.2 In September 2003, the Council produced the 'Issues Report' as the first step in the process of reviewing the Tonbridge & Malling Borough Local Plan (adopted December 1998). The purpose of the Issues Report was to set out the key issues that may need to be addressed in the Local Development Framework and to gather responses from consultees and interested parties to inform what it will contain. The Local Development Framework will also carry forward the land use and spatial aspects of the Community Strategy, produced by the Council and its partners in the West Kent Local Strategic Partnership.

2.3 From these exercises, the Council has already identified the main issues and options and has resolved to produce six Development Plan Documents (DPDs). Full details of the DPDs and their timetable are contained in the Council’s Local Development Scheme, which can be viewed on the Website (www.tmbc.gov.uk). The process for community involvement for each DPD will follow the format set out in this Statement of Community Involvement.
3 The Local Development Framework

3.1 The following Development Plan Documents will form the Local Development Framework (LDF). These documents will be produced in two tranches as outlined below.

First Tranche
- Core Strategy
- Development Land Allocations
- Tonbridge Central Area Action Plan

Second Tranche
- Generic Development Control Policies
- Environmental Protection Policies
- Open Space Policies

3.2 Each of these documents will play an important part in setting out the planning policy framework to guide future development in the Borough. The Council’s Local Development Scheme describes in detail the content and programme for the production of these documents. Appendix A contains a copy of the latest timetable for the Local Development Framework documents being produced. This will be subject to annual review.

3.3 The Council will also carry out its responsibility to involve the community in the production of the Sustainability Appraisal and Strategic Environmental Assessment work that will be carried out as part of the Local Development Framework process (see Section 8).

4 Preparation of a Development Plan Document

4.1 The preparation process for development plan documents can be divided into 4 stages as summarised below.

Stage 1: Pre-production. Survey and evidence gathering to inform the preparation of the Local Development Scheme, which outlines the Development Plan Documents to be produced and to identify the main issues and options.

Stage 2: Production. Preparation of Preferred Options in consultation with the community, including formal participation on these and preparation and submission of the Development Plan Documents having regard to the representations received on the Preferred Options Report.

Stage 3: Examination. Independent examination of the soundness of the Development Plan Document; and

Stage 4: Adoption. Receipt of the binding Inspector’s report on the Development Plan Document following the examination. The Development Plan Document must then be adopted by the Borough Council in accordance with the Inspector’s recommendations.

4.2 During the production stage, the Council will carry out a range of consultation exercises as outlined in Figures 1 and 2 to inform decisions on the Preferred Options. This ‘front-loading’ will aim to achieve consensus with the community on what the preferred options are. Under Regulations 25 and 26, the Council is required to formally consult with statutory and non-statutory consultees. There will be a period of informal consultation (Reg 25) on the options using the techniques identified in this Statement of Community
Involvement, prior to the Preferred Options being placed on statutory deposit for formal participation (Reg 26). The response will then inform the production of a draft Development Plan Document for submission to the Secretary of State (Reg 28).

5 Consultees

5.1 The Regulations for the Planning & Compulsory Purchase Act (2004) specify that certain specific consultation bodies must be consulted. The minimum requirement for pre-submission consultation is outlined in Regulation 25. It requires the local planning authority to consult with:

“(a) each of the “specific consultation bodies” to the extent that the local planning authority thinks that the proposed subject matter of the Development Plan Document affects the body; and

(b) such of the general consultation bodies as the local planning authority consider appropriate”.

5.2 The “specific consultation bodies” include:

- The Regional Planning Body
- Kent County Council and neighbouring authorities
- Parish Councils
- Countryside Agency
- Environment Agency
- Highways Agency
- English Heritage
- English Nature
- Strategic Rail Authority
- Regional Development Agency
- Owners/controllers of telecommunications apparatus
- Strategic Health Authority
- Those organisations that provide electricity, gas and water and deal with sewerage.

5.3 The “general consultation bodies” include community groups and other stakeholders such as:

- Voluntary bodies whose work benefits any part of the Borough
- Bodies representing the interests of different racial, ethnic or national groups in the area (see Section 7 on Hard to Reach Groups)
- Bodies representing the interests of different religious groups in the area; and
- Bodies representing the interests of the business community in the area.

5.4 The Council will also consult with the various government departments as appropriate. All general consultation groups and individuals have been invited to register their interest for involvement in each of the proposed Development Plan Documents. However, the Council has also included groups that are considered relevant even if an initial interest has not been received to ensure every opportunity for their involvement has been taken.

5.5 A more specific list of stakeholders and consultation groups is contained in Appendix B. As the appendices to this document do not form part of the formal Statement of Community Involvement, they can be updated as and when required. The list in appendix B is therefore not intended to be definitive, and any group or individual showing an interest in the LDF at any stage of the process will be added to the list.
5.6 For planning and allied applications, the general issue of consultation is outlined in section 11 of this document. The "statutory" consultees to be involved in each individual case are specified in Regulations and will vary on the basis of the particular detail of the Regulations in force at the time that the application is submitted. The consultees will also vary in respect of:
- the specific nature of the proposals
- the specific consultees required for that class of development proposal
Several of the organisations identified in Appendix B will, from time to time, also be a "statutory" consultee on a planning or allied application.

6 Proposed Approach & Process

6.1 The new planning system places greater emphasis on 'front-loading', and consensus building with local communities on the content of the plans that will shape the future of the Borough. Traditionally, community involvement in the planning process would involve inviting comments on proposed policies and proposals in a written document (with relevant maps) at specific stages during the process. The new planning system encourages greater community involvement throughout the process. In order to fully engage the community and take on board their views and opinions as early as possible, the Council will use the methods of community involvement outlined below to create a stronger local dialogue with the community. This general approach will be used throughout the process of Development Plan Document preparation.

6.2 There are many techniques that can be used to involve the community but a level of commitment from participants is required for wider, more comprehensive community involvement. For this reason, the Council sent out questionnaires to ask people how they would prefer to be involved. The questionnaire included information on the various methods that could be used and a copy of this is contained in Appendix C. A fuller description and analysis of the proposed techniques is contained in Appendix D. The questionnaires were sent out to those organisations and individuals who have had previous involvement with the planning policy process or have expressed an interest in getting involved. The questionnaires were also sent to the specific consultation bodies as specified in Reg 25. Approximately 600 questionnaires were sent out with a response rate in excess of 40%.

6.3 The questionnaire was designed to initiate a dialogue with the community and stakeholders on how they wish to be involved in the production of the Local Development Framework. This Statement outlines the Council’s proposed approach based on the feedback from the questionnaires. However, the Council recognises that many of the techniques are resource intensive and this strategy therefore aims to strike a balance between meeting the objectives of community involvement in the process as reflected in the responses to the questionnaire and the resources available to undertake such techniques.

6.4 The approach outlined in this Statement of Community Involvement has resource implications for the Council. The resources needed to carry out the programme for community involvement as outlined in this Statement include officer time and production costs for any exhibitions and workshops, etc. Tonbridge & Malling is part of the InterAct Kent Facilitators Network (a network of trained and experienced facilitators). This valuable resource will be used where appropriate. Corporately, the Council will aim to ensure that wherever possible consultation on the LDF takes place in tandem with other consultation exercises in order to avoid ‘consultation fatigue’ and to make best use of available resources. For example, The Local Development Framework is the principal mechanism for delivering the land use and spatial elements of the Community Strategy, and the Council will therefore work with the Local Strategic Partnership to ‘double-up’ with consultation on the Community Strategy wherever the opportunity arises. The
Development Plan Documents are complementary documents and consultation responses will therefore be used in a comprehensive manner so that the integrity of the relationship between the various documents is maintained.

6.5 The Local Development Framework process will be publicised through “Here & Now” the Council’s bi-monthly newspaper that is sent free-of-charge to all residents and businesses in the Borough. Whenever there is a consultation stage for any Development Plan Document or Supplementary Planning Document or supporting documentation such as the Sustainability Appraisal, the Council will also publicise this through the use of press releases and the Website. Subject to the requirements of the Regulations, the Council will seek to maximise its use of email and the internet to advise stakeholders of the availability of consultation documents and encourage consultees to make use of the Council’s Website rather than send hard copies of documents.

6.6 In terms of receiving representations, the Council is able and willing to receive written comments by email, fax, or letter. At the formal stages of the process those making representations will be encouraged to use the official forms for making comments, though all comments, however, received will still be registered. An interactive section of the Website will also be established so that comments will be able to made using the internet. Representations made by telephone cannot normally be registered as formal representations. Any comments made should be confirmed in writing.

6.7 The Council’s LDF programme is set out in its Local Development Scheme (see Appendix A). The LDF is to be produced in two tranches. The proposed approach to community involvement for the first and second tranche of Development Plan Documents is shown in Figure 1. The individuals and organisations involved in this process have been grouped together as set out in Figure 2, as certain methods of community involvement are considered to be more appropriate than others for different groups and different Development Plan Documents. The approach for each Development Plan Document is based on an analysis of the responses to the questionnaire in Appendix C. Appendix B gives further information on the consultees included in each group and, in general terms, the way they will be consulted. In accordance with the Regulations, the “specific consultation bodies” outlined in para 5.2 will be approached to seek their involvement in preparing all of these Local Development Documents at each stage in the process.

6.8 As indicated in Section 4 there are four stages in Development Plan Document production. Continuous community involvement will take place during the pre-production and production stages. In addition to this, there will be a formal 6 week period during which, the community can submit its views on the final draft the Council submits to the Secretary of State. These comments will be considered by an independent inspector at the examination and his report will be binding. The nature of involvement at each stage can be summarised as follows:

- **PRE-PRODUCTION STAGE: Evidence gathering and early community involvement - ‘front-loading’**: The Council has already consulted on the main issues. There will be further meetings with consultees and focus groups to consider specific issues. The Parish Partnership Panel and Tonbridge Forum will be kept up to date with progress throughout this period and be encouraged to submit views on evolving issues. The statutory consultees will be consulted on the evolving issues, as necessary, in accordance with Regulation 25. The Council will also continue to hold informal meetings with specific consultation bodies and with non-statutory consultees to discuss issues at the pre-production stage.
• **PRODUCTION STAGE:** This stage involves consultation on the **Preferred Options.** The intention will be to publish and publicise a Preferred Options Report some four weeks prior to the formal participation process together with a summary leaflet which will be distributed to every household in the Borough (if possible as an insert to “Here and Now”). This will enable an informal stage of consultation prior to the statutory stage. During this time there will be Focus Group meetings, seminars and exhibitions/displays at the Council offices and at main locations in the Borough where significant change is proposed. If necessary, the Council has a mobile exhibition trailer that it will use. This will immediately be followed by the formal 6 week period for pre-submission public participation under Regulation 26 during which the exhibitions will remain in place. The Council will statutorily advertise and issue Press Releases at this stage. In line with the Regulations, copies of the consultation document will be sent free of charge to all statutory and non-statutory consultees who have confirmed that they would wish to receive a hard copy. Other groups, companies and individuals will be able to purchase copies or download the document from the Website.

• **SUBMISSION TO SECRETARY OF STATE FOR EXAMINATION:** Under Reg 28, the community have a six week period from the date the Council submits the DPD to the Secretary of State for submitting any comments to be considered by the independent inspector at the examination stage. The Council will statutorily advertise the DPD and issue Press Releases at this stage. In accordance with the Regulations all Statutory Consultees and other consultees (as identified under Groups A, B, D and E in Figure 2) will be notified that the DPD has been submitted to the Secretary of State and sent a complementary copy of the Document if they have indicated that they need a hard copy, otherwise their attention will be drawn to the Council’s Website. Other groups, companies and individuals will be able to purchase copies or download the document from the Website.

• **EXAMINATION:** There will be a Pre-Examination Meeting at which the Inspector will agree with all those who have made representations how their views will be considered. The presumption will be that the majority of representations will be considered by Written Submissions but there is a right to be heard. Again, the presumption will be that the majority of issues will be considered at informal or roundtable sessions.
### Figure 1 - Consultation Methods for the Development Plan Documents

<table>
<thead>
<tr>
<th>Consultation Options</th>
<th>First Tranche</th>
<th>Second Tranche</th>
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</thead>
<tbody>
<tr>
<td>CORE STRATEGY</td>
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<tr>
<td>DEVELOPMENT LAND ALLOCATIONS</td>
<td>A, B, C, D</td>
<td>A, B, C, D</td>
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<tr>
<td>CENTRAL TONBRIDGE AREA ACTION PLAN</td>
<td>A, B, C, D</td>
<td>A, B, C, D</td>
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<tr>
<td>GENERIC DEVELOPMENT POLICIES</td>
<td></td>
<td>A, B, C, D</td>
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<tr>
<td>OPEN SPACE</td>
<td>A, B, C, D</td>
<td>A, B, C, D</td>
</tr>
<tr>
<td>ENVIRONMENTAL PROTECTION POLICIES</td>
<td>A, B, C, D</td>
<td>A, B, C, D</td>
</tr>
</tbody>
</table>

**Focus groups**: Area or topic based organised meetings to discuss specific issues

**Exhibitions**: Staffed exhibition outlining main issues/proposals with chance for face to face discussion

**Consultation Documents**: Draft document produced and made available for viewing in public libraries, Council Offices, on the Council’s website and made available in formats appropriate for people with disabilities.

**Planning for Real**: A specific method using maps and models to develop ideas for that particular area.

**Dovetailing or ‘Piggy-backing’**: Presentation (followed by ‘question and answer’ session) as agenda item at existing meetings (e.g. Local Fora, Parish Council meetings, meetings of community/voluntary bodies including those attended by hard to reach groups).

### Figure 2 - Consultation Groups

<table>
<thead>
<tr>
<th>Group A</th>
<th>Group B</th>
<th>Group C</th>
<th>Group D</th>
<th>Group E</th>
</tr>
</thead>
<tbody>
<tr>
<td>Groups and individuals with little or no planning background/ training e.g. residents associations, businesses.</td>
<td>Groups and individuals with some planning background, e.g. Parish Councils, Tonbridge Forum, Strategic Health Authority &amp; Primary Care Trust.</td>
<td>Groups and individuals with planning background, e.g. planning consultants, and developers.</td>
<td>National Organisations, e.g. English Heritage, Sport England, Environment Agency etc.</td>
<td>Kent County Council, Neighbouring planning authorities and Government Office.</td>
</tr>
</tbody>
</table>
7 Consulting Hard to Reach Groups

7.1 The Council has produced a good practice guide to help direct consultation with hard to reach groups. The Council considers the following groups as being 'hard to reach':

- People from Black Minority Ethnic groups
- Faith groups
- Gypsies and Travellers
- Disabled people
- Lesbian, Gay, Bisexual and Transgender (LGBT) groups
- Younger and some older people
- Asylum seekers and refugees
- Learning disabled
- Homeless people
- Lone parents
- Carers
- People living in areas of deprivation or on a low income
- People living in remote rural areas.

7.2 A significant proportion of the Borough’s residents live in rural areas, some with limited access to public transport, shops and other services. There are relatively low numbers of people from Black and Ethnic Minority Groups in the Borough and very few Asylum Seekers or Refugees. No statistical data exists on the numbers of Lesbian, Gay, Bisexual and Transgender people. However, the population profile shows that there are increasing proportions of older people and children in the borough.

7.3 A copy of the Council’s booklet ‘Consulting Hard to Reach Groups – A Good Practice Guide (February 2004), is contained in Appendix E. In consulting the hard to reach groups, the Council will follow the advice contained in the booklet and aim to consult with existing groups at existing meetings wherever possible.

8 Strategic Environmental Assessment and Sustainability Appraisal

8.1 The purpose of Strategic Environmental Assessment (SEA) is to assess the environmental impacts of the policies and proposals of the Local Development Framework. SEA enables the establishing of an environmental audit or baseline and will form the basis of the Council’s strategic environmental aims and objectives that will form a main thread through all policies and proposals set out in the Council’s Local Development Framework. The Council, in carrying out any SEA, will involve the community and stakeholders as appropriate to ensure that their views are considered in this process.

8.2 Sustainability Appraisal (SA) is the method by which the Council can assess the effects of its Preferred Options as they evolve through the process of preparing the relevant Development Plan Document (DPD). Prior to this, the Council will need to collect information on the social, environmental and economic issues that affect the geographical and/or topic area of the DPD and use this information to prepare an analysis of the baseline situation. This will then evolve into the Preferred Options for that DPD. In developing the SA, the Council will consult relevant statutory consultees and other stakeholders on the scope of the Appraisal and an initial SA Report. Because of the stage reached in the process, the Council will do this by producing a written report dealing with both aspects that will be circulated to interested parties and statutory consultees with the option of a workshop seminar to provide the opportunity for debate about the approach taken.
8.3 Following consultation on the Initial SA Report, the affects of the DPD will be appraised and followed by wider consultation on a Final SA Report with statutory consultees, other stakeholders and the general public. This will be carried out at the same stage as the consultation on the Preferred Options for the DPD under Regulation 26. Where necessary, an appraisal will be carried out of any significant changes made as a result of public participation, including possible alternative site proposals before the DPD and SA Report are submitted to the Secretary of State under Regulation 28.

9 Supplementary Planning Documents

9.1 Supplementary Planning Documents (SPD) also form part of the policy framework for guiding the future development of the Borough. These documents tend to deal with more specific or localised issues and sites. The SPDS to be produced have not yet been determined and will stem from work on the Development Plan Documents. Specific consultation will take place at an early stage on a draft of the document. Consultation will be targeted to particular groups and individuals, depending on the specific nature of the issue or location dealt with by the SPD. For example, access groups would be consulted on matters relating to transport and accessibility, whereas local residents would be consulted on a Planning Brief for a specific site. Consultation techniques will also vary depending upon the nature of the SPD.

9.2 The specific statutory consultees listed under para 5.2 and the general consultees listed under para 5.3 will be notified and consulted as appropriate. All those consulted on the draft SPD and all respondents to advertisement in accordance with Regulation 17 will also be consulted. A Press Release would also be issued at this time. Depending on the nature of the SPD, further publicity may be given at this stage in the form of a local exhibition or display (this would be most appropriate in the case of a Planning Brief).

10 Reporting Back

10.1 The Council recognises that it is important to report back to the community and other stakeholders how their comments and suggestions are taken on board. The Council will publish the feedback to all consultation on its website and in document format that will be available in all Council offices and libraries. Where consultation involves regular meetings, the Council will report back to the appropriate meetings. The Council will also contact the community and other stakeholders by letter or email to inform them in detail of the response to their suggestions and views.

10.2 The consultation procedures used by the Council detailed in this SCI will be kept under review. Where the procedures prove to be unsuccessful or where revised procedures are needed to meet new circumstances, a formal review of the SCI and re-submission to the Secretary of State will be undertaken.

11 The Council's Policy for Consultation on Planning Applications

Formal Applications

11.1 The Council deals with a variety of applications for planning permission and allied applications. It carries out consultation, publicity and notification in accordance with the relevant statutory requirements as specified in legislation in force at the time. The Council also carries out consultation in excess of the statutory requirements. For most types of application other than applications for planning permission, the Council will carry out consultation to an extent consistent with that required for a planning application, even though there may be no Statutory requirement for this.
11.2 The Council currently uses a combination of the following:
- site notices
- letters to local residents/businesses
- press advertisements
- weekly list of applications (to both public and consultees) - by both hard copy and e-mail
- weekly list of applications on the Council's Website
- specific consultation with statutory and non-statutory consultees, including local community groups and amenity/conservation societies
- notification to Parish and Town Councils – enhanced by the provision of a full copy of every relevant application
- in significant cases (and where deadlines permit) publicity in the Council's own newspaper, Hear and Now.

11.3 For the purpose of consulting neighbouring residents and businesses, the Council's preference is to send letters to individual premises. Letters are sent to at least the most immediate neighbours and, for larger proposals, more widely, the extent of this depending principally upon the scale of the proposal. Consultation letters invite responses to be made within 23 days of the date of the letter (this being the usual statutory period of 21 days plus two days to allow for any postal delays). Where the owner or occupier of neighbouring land cannot readily be identified, the Council will put up a site notice nearby.

11.4 Where a press notice is required or thought to be appropriate, the Council will place this in one of three local newspapers circulating within the Borough, the choice of newspaper depending upon the location of the application site.

11.5 If an application is significantly amended during its consideration, the Council will send a further round of consultation letters to nearby residents and to any additional people who have already written in with comments. A copy of the revised plans will also be sent to the relevant Parish or Town Council.

11.6 The Council will place copies of applications and accompanying plans, etc "on deposit" at its offices at Tonbridge Castle, for those sites within Tonbridge and the Parishes of Hildenborough and Hadlow, and the offices at Kings Hill for the remainder of the Borough. Parish and Town Councils are also encouraged to make copies available to residents.

11.7 The Council receives and handles comments received by conventional post, fax and e-mail.

11.8 The Council has firm proposals and funding allocated to develop its Website to:
- display the full details of all planning applications
- use it to receive comments interactively
- allow applicants to check on the progress of their application

11.9 The Council operates three Area Planning Committees, each covering a distinct geographical part of the Borough. All Borough Council Members sit on at least one of these Committees.

11.10 The Council allows public speaking at its Area Planning Committees in respect of those applications that the Council itself is determining. Under current arrangements, the Parish or Town Council, the applicant (or agent) and anyone else who has submitted written comment on the application may address the Committee for three minutes.

11.11 At the time a decision is issued on any application, the Council sends letters to all those who have submitted written comments on the application, advising whether the
application has been approved or refused. A copy of the Decision Notice is sent to the relevant Parish or Town Council. A list of all decisions issued during the previous month within that part of the Borough is attached to the agenda of the Area Planning Committees.

Pre-submission consultation

11.12 The Council will encourage potential applicants to publicise and consult on emerging larger scale projects before they submit a planning application. In addition to the techniques set out above it may well be appropriate to engage in one, or a series of, public exhibitions. This technique has been used successfully either with Council officers being present or with the developer alone engaging with the public.

11.13 The Council will look to develop, in due course, a "stop press" area of the website where emerging schemes can be publicised and views canvassed.

11.14 On major planning applications, the Council is developing a project management approach. This is an ‘agreement’ of a project plan with developers and landowners setting out a timetable towards the determination of an application and subsequent submission of reserved matters. Such project plans are to be agreed, as far as possible, with key stakeholders and consultees in order to bring greater certainty to the decision making timetable.

Kent Design – A Guide to Sustainable Development

11.15 Principle 1.4 of Kent Design gives support for and general guidance on community involvement and collaboration with those promoting development. This is crucial in pre-submission discussions. The section encompassing principle 1.4 is set out below. It gives advice predominately, but not exclusively, on residential schemes and is a useful resource that the Council takes into account in dealing with pre-submission publicity and consultation.

“Adopt a proactive and collaborative approach to development proposals to achieve the optimum solution for a given site

1.1: Positive and early dialogue on scheme development should be encouraged

1.2: Local Authorities should promote a Development Team approach

1.3: Adequate preparation should be ensured before negotiations are undertaken

1.4: The local community should become involved in project development

1.5: Systems for the monitoring and bench-marking of schemes should be put in place

1.6: Local Planning Authorities should build on the principles provided by Kent Design in the preparation of detailed design guidance for specific areas and sites”.
Appendix A - LDS Timetable
# Timetable for Production of Local Development Documents - First Tranche

## FIRST TRANCHE

<table>
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<th>Milestones</th>
<th>2004</th>
<th>2005</th>
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<tr>
<td>Local Development Scheme</td>
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<td>Core Strategy, Developmentalloctions, and General Framework Area Action Plan (CPs)</td>
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<td>Member consideration of issues &amp; options</td>
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<td>Analysis/Preparation of Preferred Options Report</td>
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Appendix B - List of Consultees
• Davgold Limited
• David Hicken Associates
• Denbigh & St Bernards Residents’ Association
• Department for Culture, Media & Sport
• Department of the Environment, Food and Rural Affairs- Rural Team
• Dept of Education & Skills
• Development Planning & Design
• Diocesan Board of Finance
• Diocese of Rochester
• Direct Build Services
• Disability Rights Commission
• Disabled and sensory Impaired Group
• Disabled Persons Accommodation Agency
• Disabled Persons Transport Advisory Committee
• Ditton CEJ School
• Ditton CI School
• Ditton Conservation Group
• Ditton Parish Council
• Development Planning and Design Service
• DTZ Debenham Thorpe
• E Malling & Larkfield Parish Council
• E Malling Conservation Group
• E Malling Research Association
• East Malling Institute
• East Peckham Parish Council
• East Peckham Residents’ Association
• East Street Area Residents’ Group, Tonbridge
• Eccles Over 50s Club
• EDF Energy Networks (SPN)Plc
• Employment Service
• East Malling Trust for Horticultural Research
• Enalon Limited
• English Churches Housing Group
• English Heritage
• English Nature
• English Sport England
• Enterprise Agency of West Kent
• Environment Agency
• Environmental Services Association
• Equal Opportunities Commission
• Escrick Park Estate
• Fairlawne Estate Co Ltd
• Fairseat Residents' Association
• Fairview New Homes Plc
• Farming & Wildlife Advisory Group
• Federation of Small Businesses
• Fidelity International Ltd
• Fire Prevention Officer
• Forest Grove Residents’ Association
• Forestry Commission
• Forestry Commission-South East England Conservancy
• Foxbush Cottage
• FPD Savills
• Fraser Wood Properties
• Freight Transport Association
• Friends of the Earth
• Friends of Wateringbury Village
• Funding Agency for Schools
• G W Finn & Sons
• Gallagher Group
• Garden History Society
• Geberit Limited
• General Aviation Awareness Council
• Geoffrey O Butcher & Associates
• George Wimpey
• Georgian Group
• Gerald Eve
• Gerry Lytle Associates
• Golden Green Association
• Golden Green Womens' Insitute
• Government Office for the South East
• Gough Planning Services
• Government Office for the South East
• Government Oil Pipelines
• Graham Simpkin
• Gravesham Borough Council
• Great Weald Enterprise Agency
• Greenfingers Training Scheme
• GVA Grimley
• Gypsy Council
• Gypsy Liaison Officer
• H + H Celcon Ltd
• Hadlow Bowls Club
• Hadlow College of Agriculture & Horticulture
• Hadlow Footpath Group
• Hadlow Gardeners’ Society
• Hadlow Historical Society
• Hadlow Parish Council
• Hadlow Park Residents' Association
• Hadlow Place Farm
• Hadlow Residents' Association
• Hadlow Road Neighbourhood Group
• Hadlow Society
• Hadlow Womens’ Institute
• Hallam Land Management Ltd
• Halling Parish Council
• Hanover Retirement Housing
• Haydens Management Ltd
• Hayesbrook School
• Healey & Baker
• Health and Safety Executive
• Health Promotion Service
• Help the Aged
• Her Majesty's Inspectorate of Pollution
Hi Kent
HID C13a
Higham Residents' Association
Highways Agency
Hildenborough Afternoon Womens' Institute
Hildenborough Conservation Group
Hildenborough Parish Council
Hildenborough Residents' Association
Hildenborough Village Preservation Association
Hillreed Developments Limited
Hillreed Homes Ltd
Hillview School for Girls
Holiday Inn
Home Office
Home Start
House Builders Federation
Housing Corporation (South)
Howard Chapman Ltd
Howarth & Bassett Partnership
Hugh Christie School
Hyde Housing Association
Ibbett Mosely
Ightham Common Residents' Group
Ightham Parish Council
Institute of Historic Building Conservation
Insignia Richard Ellis
Invicta Community Care NHS Trust
J C Cunnane
John Childs & Associates
Jones Day
Judd School
KCC Highways & Transportation
Kelsey Housing Association
Kemsing Parish Council
Kemsley T W & B W & Son
Kent & Medway Strategic Health Authority
Kent Ambulance NHS Trust
Kent Archaeological Rescue
Kent Association for the Blind
Kent Association of Parish Councils
Kent County Constabulary
Kent County Council
Kent County Playing Fields Association
Kent Downs AONB Office
Kent Family Mediation Service
Kent Federation of Amenity Societies
Kent Fire Rescue Service
Kent Learning Partnership
Kent Messenger Group
Kent Police
Kent Regionally Important Geological and Geomorphological Sites (RIGS) Group
Kent Rural Commission
Kent Rural Community Council
Kent Wildlife Trust
Kimberly-Clark Ltd
Kings Hill Community Centre
Kingshill Parish Council
Kitwood Estates
L C P Properties
Lafarge Cement UK
Lafarge Redland Aggregates
Lambert & Foster
Land & Property Partnership
Landmark Information Group Ltd
LARA
League of Friends of Tonbridge Cottage Hospital
Learning & Skills Council
Leigh Parish Council
Leybourne Grange Riding Centre for the Disabled
Leybourne Parish Council
Littman Robeson
Living Streets
Lloyd Hunt Partnership
Lloyds Bank plc
Locate in Kent
London and Quadrant Housing Trust
Longmead Residents' Association
Lovell-Johns
Lower Medway Internal Drainage Board
Luddesdown Parish Council
Macy's Meadow Advisory Committee
Magnet Ltd
Magnum Opus Developments
Maidstone & Mid-Kent Chamber of Commerce
Maidstone & Tunbridge Wells NHS Trust
Maidstone Borough Council
Maidstone Civic Society
Maidstone Community Health Council
Maidstone Police Station
Maidstone Weald PCT
Maidstone Weald Primary Care Trust
Malcolm Judd & Partners
Malling Area Volunteer Bureau
Malling Lions
Malling School
Malling Society
Margaret Club for the Blind
Martin Grant Homes Ltd
Martin Square Traders Association
Marwalk Developments Ltd
Maunsell & Partners
McCarty & Stone Developments Ltd
Medway Council
Medway Council Education Department
Medway Docks and Harbour Company
• Smurfit Townsend Hook
• Snodland CEP School
• Snodland Chamber of Commerce
• Snodland Labour Party
• Snodland Town Council
• Social Services
• Society for the Protection of Ancient Buildings
• Society of Friends
• South East England Development Agency
• South East England Regional Assembly
• South East England Tourist Board
• South East Water
• South Eastern Trains
• South West Kent PCT
• Southborough Parish Council
• Southern Housing Group
• Southern Water
• Spacia
• Spadework
• Sport England South East
• St Clere Estates
• St George’s Court Social Club
• St Johns Ambulance
• St Mary’s Platt & District Society
• Stansted & Fairseat Society
• Stansted Parish Council
• Stepstile Residents' Association
• Strategic Rail Authority
• Strutt & Parker
• Styletech
• SW Kent Primary Care Trust
• Swale Borough Council
• Swanmead Sports Association
• TNT Express (UK) Ltd
• Tarmac Quarry Products Ltd
• Tarmac Roadstone ((Southern)
• Tatlow King Planning Consultants
• Taylor Woodrow Developments Limited
• Telewest
• Terence O’Rourke
• Tesco Stores Ltd
• Teston Parish Council
• Tetlow King Planning
• Thames Water plc
• Thames Water Utilities
• Thanet District Council
• The Bell Cornwell Partnership
• The Bridge Trust
• The Broadbent Partnership
• The Camping and Caravanning Club
• The Drive Residents' Association
• The Ember Trust
• The Freeholders Residents Association
• The Georgian Group
• The Good Companions Club

• The Kenward Trust
• The London Green Belt Council
• The Red Cross (Tonbridge)
• The Religious Society of Friends
• The Ridley Society
• The Royal Institute of British Architects
• The Royal Institute of Chartered Surveyors
• The Skinners Company
• The Trottiscliffe Society
• The Twentieth Century Society
• Theatres Trust
• Three
• Tonbridge Active Retirement Association
• Tonbridge Allotments & Gardens Association
• Tonbridge and Malling Housing Association
• Tonbridge Angling Club
• Tonbridge Angling Society
• Tonbridge Art Group
• Tonbridge Christian Leaders
• Tonbridge Citizens Advice Bureau
• Tonbridge Civic Society
• Tonbridge Consortium of Headteachers
• Tonbridge Cottage Hospital
• Tonbridge Crime Prevention Panel
• Tonbridge District Scouts
• Tonbridge Division Guides
• Tonbridge Evening Townswomen’s Guild
• Tonbridge Football Club
• Tonbridge Grammar for Girls
• Tonbridge Historical Society
• Tonbridge Job Centre
• Tonbridge Lions Club
• Tonbridge Ministers Fraternal
• Tonbridge Model Engineering Society
• Tonbridge Music Club
• Tonbridge Philharmonic Society
• Tonbridge Rotary Club
• Tonbridge Round Table
• Tonbridge School
• Tonbridge Sports Association
• Tonbridge Theatre & Arts Club
• Tonbridge Town Lands
• Tonbridge U3A
• Tonbridge United Charity
• Tonbridge Visually Impaired Craft Club
• Tonbridge Volunteer Bureau
• Tonbridge VSU
• Tonbridge Young Farmers' Club
• Town Planning Consultancy
• Townswomens Guild
• Transco South East Ltd
• Traveller Law Reform
• Trench Wood Residents' Group
• Trident House Design
• Trottiscliffe Parish Council
• Trottiscliffe Society
• Tunbridge Wells Borough Council
• Tunbridge Wells Community Health Council
• Tunbridge Wells Health Authority
• Union Railways
• Upper & Lower Medway Internal Drainage Boards
• Valuation Office
• Victorian Society
• Vincent & Gorbing
• Vodafone
• W Kent Rural Highways Management Unit
• W Malling Chamber of Commerce
• Walderslade Residents' Association
• Wallace & Tiernan Ltd
• Ward Homes
• Wateringbury Parish Council
• Wateringbury Residents' Association
• Wates Build Homes
• Weald of Kent Grammar School for Girls
• Weald Parish Council
• Wealden Homes S E Ltd
• Weatherall Green & Smith
• West Farleigh Parish Council

• West Kent Area Education Office
• West Kent Business Centre
• West Kent Chamber of Commerce & Industry
• West Kent College
• West Kent Council for Voluntary Services
• West Kent Education Business Partnership
• West Kent Housing Association
• West Kent Neighbourhood Watch Association
• West Kent YMCA
• West Kent Young Womens' Project
• West Kingsdown Parish Council
• West Malling Chamber of Commerce
• West Malling Historical Society
• West Malling Parish Council
• West Peckham Parish Council
• Whitbread & Co
• Wilcon Homes
• Wilson Connolly Home Counties
• Wimpey Homes Holdings Ltd
• Winterfield Residents' Association
• Wood Frampton
• Women's National Commission
• Woodland Trust
• Woodlands Residents' Association
• Wouldham Action Group
• Wouldham Parish Council
• Wrotham Parish Council
• Wrotham School
• Yalding Parish Council
• Youth & Community
Appendix C - Questionnaire
Dear <NAME>,

**Future Housing & New Development – Your opportunity to be involved**

As you are aware, under the Government’s new system, the Local Development Framework (LDF) is to replace the Local Plan. The LDF will consist of a portfolio of documents that sets out the Council’s land-use strategy for the future.

We published an Issues Report in September 2003 in preparation for our first LDF. In that report we asked for your views on the land-use, planning and development issues facing the Borough. Feedback from the Issues Report identified some key points that need to be addressed in our LDF, including:

- Allocation of land for new housing & other development
- Affordable Housing policy
- Protecting the countryside
- Development in Tonbridge town centre
- Housing development on land that has been earmarked for other uses (especially industry and office use)

This questionnaire sets out options for you to be further involved in shaping the future development of our Borough. In fact this is an opportunity for you to be involved in a matter that is important for Borough residents and businesses in general. Previous research has shown that controlling housing/new development and protecting the environment are amongst the public’s top priorities for improvement to make our area a better place in which to live.

If you have any queries about this questionnaire or the LDF please contact Jill Rae, Principal Planning Officer (Policy). Contact details are at the top of this letter. Alternatively, for more information about the LDF, visit our website at [www.tmbc.gov.uk](http://www.tmbc.gov.uk). Otherwise, please return your completed questionnaire in the reply paid envelope by 17th September 2004. Thank you for your time and assistance.

Yours sincerely,

[Signature]

Jill Rae
Principal Planning Officer (Policy)
Do you want to be involved?

We will be producing the following detailed Development Plan Documents to address the key points identified by feedback from the Issues Report:

<table>
<thead>
<tr>
<th>Document</th>
<th>Description of Document</th>
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<tbody>
<tr>
<td>Core Strategy</td>
<td>Outlines the vision, overall approach and core policies guiding development.</td>
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<tr>
<td>Development Land Allocations</td>
<td>Decides where the new homes, shops, offices and industrial premises should go and safeguards land for new roads and schools.</td>
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<tr>
<td>Environmental Protection Policies</td>
<td>DEALS with protecting and enhancing our built and natural environment including conservation and flood prevention.</td>
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<tr>
<td>Tonbridge Central Area Action Plan</td>
<td>Provides the policy framework to guide development in Tonbridge town centre and looks at scope for enhancing it.</td>
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<tr>
<td>Generic Development Control Policies</td>
<td>General policies for controlling specific matters such as house extensions and development in rural areas.</td>
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<tr>
<td>Open Space Policies</td>
<td>Open space policies to take forward the land use aspects of the Open Space Strategy that the Borough Council is preparing, protecting and enhancing the network of open space in the Borough.</td>
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There will also be a Proposals Map to identify where policies and proposals apply.

We would very much welcome your involvement in progressing these Development Plan Documents. You can be involved in a number of ways. These are listed in the table opposite. Please consider them carefully and choose those that are appropriate and convenient to you or your organisation, recognising that each option will involve a commitment of your time and energy. You may consider that different approaches may be better for some Local Development Documents than others.

If you wish to be involved in any of the ways listed, please confirm this by ticking the boxes in the table opposite. You may tick as many boxes in each column as you think appropriate to you or your organisation.

Additionally, or alternatively, you may wish to be involved in progressing these Development Plan Documents in ways other than those listed on the opposite page. If so, there is an opportunity for you to tell us about these on the back cover of this questionnaire.

If you would prefer not to be involved at all please tick the box directly opposite and you will not be consulted further on this matter.
## Consultation Options (1-7)

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<th>Options</th>
<th>Development Plan Documents</th>
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<td>1. Area-based focus groups: Area-based organised meetings to discuss specific issues. Likely to include presentations and workshops.</td>
<td>Core Strategy</td>
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<td>2. Exhibition: Staffed exhibition outlining main issues/proposals with chance for face-to-face discussion.</td>
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<td>3. Mail drop/leaflets: A leaflet summarising issues/proposals sent to all households and businesses in the Borough. Recipients asked to write in with their views.</td>
<td></td>
</tr>
<tr>
<td>4. Postal Survey: Of interested parties for their views &amp; opinions.</td>
<td></td>
</tr>
<tr>
<td>5. Consultation Documents: Draft document produced and made available for viewing in public libraries, Council Offices, on the Council’s website etc. Written views on content of document are sought.</td>
<td></td>
</tr>
<tr>
<td>6. Planning for Real: A specific method using maps and models to develop ideas for that particular area.</td>
<td></td>
</tr>
<tr>
<td>7. Dovetailing (or 'piggy-backing'): Presentation (followed by questions and answer session) as agenda item at existing meetings (e.g. Parish Council meetings etc.).</td>
<td></td>
</tr>
</tbody>
</table>

I do not wish to be involved in helping to progress the Local Development Documents.
You may also wish to be involved in other ways that you have already identified or thought of. If so, please briefly describe them for the appropriate Development Plan Document(s) below:

<table>
<thead>
<tr>
<th>Consultation Options</th>
<th>Development Plan Documents</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Core Strategy</td>
</tr>
<tr>
<td>Other way in which you would like to be involved (Please describe):</td>
<td>☐</td>
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<tr>
<td>Other way in which you would like to be involved (Please describe):</td>
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<tr>
<td>Other way in which you would like to be involved (Please describe):</td>
<td>☐</td>
</tr>
</tbody>
</table>

Thank you very much for taking part in this survey.

Please return your completed questionnaire in the reply paid envelope by 17th September 2004.

And finally… Remember to provide us with the latest information if you change address or other contact details.
Appendix D - Analysis of consultation techniques
<table>
<thead>
<tr>
<th>Method</th>
<th>Description of Method</th>
<th>Advantages</th>
<th>Disadvantages</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Area-based focus groups</td>
<td>Area-based organised meetings to discuss specific issues. Likely format of meeting would include presentations and workshops</td>
<td>Discussion is encouraged - views recorded as part of the event - a good way to share information</td>
<td>Sometimes dominated by a few individuals. Some people may feel shy and will not participate</td>
</tr>
<tr>
<td>2 Exhibition</td>
<td>Staffed exhibition outlining the main issues or proposals with opportunity for face-to-face discussion</td>
<td>Can reach wide audience - especially if held on different days, at different times and in different locations</td>
<td>Would need to be followed up with written views being submitted at the exhibition or at a later date.</td>
</tr>
<tr>
<td>3 Mail drop/ leaflets</td>
<td>Leaflet summarising issues or proposals are sent to all households and businesses in the Borough and respondents are invited to submit their views in writing</td>
<td>Can be sent to all homes and businesses in the Borough and read when convenient</td>
<td>Leaflets could be thrown out with unsolicited mail. Unrepresentative response.</td>
</tr>
<tr>
<td>4 Citizens Panels</td>
<td>Sample of population (1,000 people) are targeted for their views and opinions</td>
<td>Can provide a representative view</td>
<td>Reaches a limited group and cannot be used to cover all aspects of planning - no opportunity to ask questions</td>
</tr>
<tr>
<td>5 Consultation Documents</td>
<td>A draft document is produced and this is made available for viewing in public libraries, Council Offices etc. on the Council’s website and for purchase from the Council. Written views on the content of the document are sought.</td>
<td>Particularly useful for those with a knowledge of the subject.</td>
<td>Limited opportunity for discussion. Not user friendly for those with little or no knowledge of the subject.</td>
</tr>
<tr>
<td>6 Planning for Real</td>
<td>A specific method using models of the area to develop ideas for a specific area</td>
<td>Hands-on participation, creates opportunities for discussion.</td>
<td>Only suitable for area-specific work e.g. Tonbridge town centre</td>
</tr>
<tr>
<td>7 Dovetailing (or 'piggy-backing')</td>
<td>Presentation (followed by questions and answer session) as agenda item at existing meetings (e.g. Parish Council meetings etc.)</td>
<td>Opportunity to show links between planning and the work of other agencies/organisations</td>
<td>Reaches limited group - may not be enough time to discuss all the relevant issues</td>
</tr>
<tr>
<td>8 Telephone Surveys</td>
<td>Individuals are asked for their views on a subject</td>
<td>Representative view on specific subject or area</td>
<td>Cannot be used to cover all aspects of planning and reaches a limited group</td>
</tr>
</tbody>
</table>
Appendix E - Hard to Reach Groups
Consulting Hard to Reach Groups

Contents

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Introduction

The aim of this publication is to provide some basic guidance about how to include ‘hard to reach’ groups in public consultation exercises carried out in Tonbridge & Malling.

Community participation, consultation and involvement are a familiar part of local government work and are essential to the modernising agenda. Ensuring all sections of the community are able to have their say through consultation is important. Equally, it is vital that people do not feel ‘stigmatised’ or ‘singled out’ but that our attempts to ensure inclusion are genuine and respectful.

This guide will seek to address issues such as how to consult different groups and what mechanisms exist to avoid ‘consultation overload’.

Different sections of the community, particularly minorities, may have needs or views that are different to those of the majority and, if they are not consulted effectively, these needs or views may remain invisible.” (Audit Commission Management Paper: Listen-up! Effective Community Consultation 11/99)

Why consult?

There are many potential benefits in listening to the views of the people that use or are affected by our services. At its best, consultation can improve and inform the development of our policies and practices, helping us to deliver appropriate and efficient services that meet our customers’ needs. At its worst, it is a ‘tick box’ exercise which serves only to reinforce the view that ‘the council doesn’t listen’. By only consulting those individuals or groups who regularly respond to consultation, the views of harder to reach groups can be overlooked.
Consulting Hard to Reach Groups

Who are the ‘Hard to Reach’?

There is no one definition of the term ‘hard to reach’ because groups which have traditionally been under-represented in formal consultation vary considerably across geographical areas. The term tends to be associated either with a narrow set of groups (predominantly minority ethnic, gay and lesbian) or a broader set (including older people, people with disabilities and young people).

In some situations, it might be necessary to further widen this to include geographical groups, for example those living in areas of deprivation or in remote rural areas.

What must be remembered is that ‘hard to reach’ groups are made up of individuals who may not have anything in common with others identified under this heading and may therefore require different approaches to consultation and involvement.

In Tonbridge & Malling, we would consider the following groups as being ‘hard to reach’:

- People from Black Minority Ethnic groups
- Gypsies and Travellers
- Disabled people
- Lesbian, Gay, Bisexual and Transgender (LGBT) groups
- Younger and some older people
- Asylum seekers and refugees
- Learning disabled
- Homeless people
- Lone parents
- Carers
- People living in areas of deprivation or on a low income
- People living in remote rural areas

Hard to Reach groups in Tonbridge & Malling

At the 2001 census, Tonbridge & Malling had a population of 107,561 with the urban area of Tonbridge accommodating a third of the population. A significant proportion of the Borough’s residents reside in rural areas, some with limited access to public transport, shops and other services. There are relatively low numbers of people from Black and Minority Ethnic Groups in the Borough and very few Asylum Seekers or Refugees. No statistical data exists on the numbers of Lesbian, Gay, Bisexual and Transgender people. The population profile shows that there are increasing proportions of older people and children in the borough.

Small Numbers

The inclusion or exclusion of groups in consultation should not be determined by the numbers of individuals involved. General consultation exercises should aim at being as inclusive as possible to ensure that where people wish to be involved, we do as much as we can to enable their involvement.

While every consultation exercise should follow good practice, on occasion, if for example the views of a specific group are required, it may not be appropriate to consult with all hard to reach groups. Consultation should always be carried out with a clear purpose and target groups should be selected with great care.
Consulting Hard to Reach Groups

Black and Minority Ethnic Groups

Just under 96% of Tonbridge & Malling residents are white British. More than half of the remaining population is made up of other white groups including Irish. At the time of the 2001 census, there were 753 people of mixed race, 538 Asian or Asian British people, 140 Black or Black British people and 215 Chinese people. There were 183 people from other ethnic groups. The Borough has 2 official Travellers’ sites and an additional ‘tolerated’ site. A full breakdown of the statistics for Tonbridge & Malling can be found on the council’s Intranet.

With such small populations, it is difficult to access these people and there is significant potential for consultation overload on individuals. There are no representative groups based in the Borough, with places of worship and other community facilities generally located in neighbouring districts. This has traditionally made accessing the views of these groups particularly difficult.

The needs and priorities of different black and minority ethnic communities vary greatly and just consulting one group will not be sufficient. Women from some ethnic groups may be particularly difficult to reach and could require different approaches, for example, separate focus groups.

Younger and Older People

The chart shows the age profile of Tonbridge & Malling’s population from the 1991 to the 2001 census. It shows that the population is getting older with fewer people in their 20s and early 30s and more in their 40s and 50s. The proportion of older people in the borough looks likely to continue to increase.

There are some well developed networks supporting older people, such as Age Concern. There are also a number of youth groups and a youth forum in the borough. For more information on groups that may be able to assist with consultation, see page 28.

Religions in Tonbridge & Malling

The main religion in the Borough is Christianity, with 76% of the population. In addition, the census revealed that there were 161 Buddhists, 172 Hindus, 129 Jews, 323 Muslims and 75 Sikhs. Other religions were followed by 258 people. Some groups will be unable to attend an event or meeting during certain religious festivals. Check the internet for dates of festivals at: www.support4learning.org.uk/shap/index.htm.

Younger people, particularly those in their teens and twenties, can be under represented in consultation. This group tends to be very mobile, moving for higher education or work. Young men can be particularly difficult to engage.

Some older people are very active in their local communities and participate regularly in consultation exercises. However, others find it difficult to become involved in consultation due to, for example, a disability or lack of transport.
Consulting Hard to Reach Groups

People with disabilities

The 2001 census revealed that over 15,000 people in the borough, or 14% of the population, suffer from a limiting long term illness and 6916 rated their general health as 'not good'. A wide range of health problems and disabilities affect an individual's ability to participate in consultation exercises.

Learning disability is a very broad term referring to conditions ranging from mild literacy difficulties to profound and multiple disabilities including sensory, physical and mental impairment.

By following the suggestions set out on the following pages, it is possible to overcome some barriers people with disabilities might face. However, some groups will require a more specialist approach if they are to be enabled to participate fully. A detailed guide on including disabled people in communication and consultation, ‘Getting it Right’, is available from Executive Services.

Consideration should be given to the carers of people with disabilities or illnesses who may also face multiple barriers to involvement.

Other Groups

People living in deprived areas may face multiple barriers to participation including for example, low levels of literacy, no access to transport, low self esteem, fear of, or antipathy towards, authority or isolation.

Lone parents may lack the time or the necessary resources to participate in terms of transport or childcare facilities.

The views of lesbian, gay, bisexual and transsexual people may not be included in consultations and these groups can be very hard to reach in a community.

Homeless people often have need of a wide variety of services but may have limited means for taking part in consultation exercises.

Rural isolation may also be a factor, limiting people’s opportunities to find out about consultation events through normal publicity channels and limited access, particularly for those reliant on public transport.

Disability Discrimination Act

Part 3 of the Disability Discrimination Act states that disabled people should not be treated less favourably because of their disability by those providing goods, facilities or services to the public. There is a legal requirement to make ‘reasonable adjustments’ to prevent disabled people being excluded from the services we offer to the general public and this will extend to consultation exercises.
Consulting Hard to Reach Groups

The Citizens’ Panel

The Tonbridge & Malling Citizens’ Panel was established in 2000 and is one of the best performing panels in the country with response rates typically reaching 80%. The Panel was drawn from a list of invitees selected to represent all geographical areas and socio-economic groups in the borough. The method of selecting Panel members and refreshing the Panel with new members has led to a good, representative cross section of the Borough and consultation using the Panel is cost efficient and reliable. However, the nature of questionnaires in general prevents the involvement of certain groups, particularly those with learning or other disabilities which make reading or writing difficult, literacy problems or where English is not the first language.

Preparing for Consultation

In every consultation exercise, consideration should be given from the outset as to how hard to reach groups are to be included. Consultation is a time consuming and potentially expensive process and should not be undertaken without clear purpose, or if the information collected will not have a significant bearing on policy or practices.

Ask yourself the following questions:-

1. Are the aims and objectives of your consultation clear?

2. Who do you want to ask? Is it most appropriate to consult the Citizens’ Panel? Do you have a specific target group or groups and if so, are you sure you are not making an incorrect assumption about the interest of other groups in your study area?

3. Many organisations carry out consultation exercises. Have you checked that what you need to find out has not already been the subject of a recent local study? If your area of work involves other service providers, for example the health sector or county council, is there any potential for shared working on the subject, could value be added (and costs reduced) by working in partnership?

4. How would you like to gather the data? Is your chosen approach appropriate for hard to reach groups or is some supplementary approach required?

5. What specific barriers do you think hard to reach groups might face when participating in your consultation exercise?

Engaging Representatives

Consider getting representatives from hard to reach groups involved in the early planning stages. This might help tailor your approach from the outset and maximise your chances of gaining good response rates.
Consulting Hard to Reach Groups

Choosing a Methodology

This guide does not deal in detail with the advantages and disadvantages of the many consultation techniques now in common practice. A great deal of published information exists and the Improvement and Development Unit can help in identifying the most appropriate methodology.

When planning consultation it is always important to consider the integrity of the data you collect. When dealing with small sample sizes, quantitative data may not be as useful, except perhaps as an anecdotal comparison with a larger sample. Qualitative approaches, if well designed, might provide more useful information.

Use the expertise of the IDU to create an appropriate consultation framework, there is little point in investing time and money in consultation if the results lack integrity and therefore meaning.

Consultation methods can be divided into 2 basic groups:

Written methods
- Postal Questionnaires
- Internet/Email
- Citizens' Panel

Verbal methods
- Focus Groups
- Conferences
- Personal & Telephone Interviews

Groups can be excluded from consultation for a range of reasons with individuals facing one or more difficulties. It would be impossible to identify and remedy every possible barrier to participation in consultation, however it is possible to design more inclusive consultation exercises.

When deciding on your method of consultation, consider what issues your target group(s) might face with selected methods and what approaches you might take to overcome, or mitigate these barriers. The following section outlines the kind of barriers hard to reach groups might face and how they might be overcome or reduced.

Quantitative or Qualitative?

**Quantitative** research looks at how many people hold a certain view.

**Qualitative** research aims to understand what views people hold and why.

The two approaches can usefully complement each other.

Combine Approaches

To ensure the inclusion of hard to reach groups, it is likely that more than one approach will be necessary. For example, you may decide to hold one or more special consultation events for particular community groups to complement a large scale postal questionnaire.
Consulting Hard to Reach Groups

Consider using telephone questionnaires or face-to-face surveys or running focus groups. You might need specialist help.

Provide accessible written information:
- At least 12pt, preferably 14pt
- Plain English checked
- Use clear sans-serif font, such as Arial
- Avoid italicised fonts
- Use an even type spacing
- Justify left margins and leave right margins ragged
- Avoid printing over a background image
- Use illustrations where they will add to clarity, but avoid stereotypes or patronising imagery
- If using graphs, make them clear and easy to understand and ideally, provide a written summary.

Consider the need to provide the information on audio tape, which can be useful for many people, not just those with visual impairments.

Do you need a sign language translator at a meeting or focus group? Think about the needs of your audience. If in doubt, ask.

Ensure that anyone needing more information is able to access it in a suitable language - Language Line can assist.
Consulting Hard to Reach Groups

Intimidated or alienated by approach

Communication/literacy problems preventing confident participation

Put off by ‘officialdom’, perhaps because of past experience or fear of losing benefits/services

Attitude of staff

A long standing hostility towards authority in general or the Council in particular

Lack of confidence or self-esteem ‘my opinion is worthless’

Confidentiality
Give clear information on the confidentiality of the information collected.

Anonymity
Do not make people give their names and addresses if they clearly do not want to and it isn’t absolutely essential.

Follow good practice guidelines for written communications. Consider using telephone or face-to-face methods of consultation.

Ensure that staff involved in carrying out consultation work are adequately trained in equalities issues and avoid the use of stereotypes, assumptions on behaviour or any approach which may appear patronising or discriminatory.

Consider engaging a specialist consultant, voluntary or community group to carry out the consultation on behalf of the Council.

Consider using intermediaries who are already known and trusted by your target group, for example a Family Liaison Officer or other community worker.

As part of your consultation, contact community representatives and those who work closely with your target community, such as health workers or teachers.

Choose the language you use carefully and explain clearly that individual views do matter and there are no right or wrong answers. Consider approaching people in areas or situations that are familiar to them so they feel comfortable rather than planning events to suit your service.
Consulting Hard to Reach Groups

Can’t access meeting venue

- No transport available
- Lack of adequate child care
- Cannot physically access the venue
- Fear of going out after dark or alone
- Timing makes attendance very difficult or impossible, clashes with school run, during the working day, religious festivals

Plan any meetings in more easily accessible locations, for example, if your study is on a geographical location, go to that location for your meeting rather than asking people to come to you. Choose a good public transport hub and think about parking including cost and availability. Are you able to cover people’s expenses?

If necessary, depending upon your target group(s), consider providing transport to the venue and also consider the necessity of providing child care.

Check that the venue meets the requirements of the Disability Discrimination Act.

Timing can be difficult because different groups have different needs. Be clear about the people you want to ask and plan the event around their needs. If possible, involve community representatives in planning the event. Use the internet to check if your event coincides with relevant religious festivals. If you need to consult a wide range of people, consider the possibility of arranging more than one event to suit different groups, e.g. during the day for people with school age children and older people, evening for people who work.

Making Contact

Find out about local events attended by your target groups and think about how you could use these events to make contact.
Consulting Hard to Reach Groups

Lack of time or resources

- Busy working families and lone parents
- Poorly funded community and voluntary groups
- People unable to respond within the period for consultation

Go to your respondents directly – for example, parent and toddler groups, even outside the school gates and carry out your survey face to face.

Some voluntary and community groups rely completely on volunteers to staff their organisations. Bear in mind that time spent responding to questionnaires is time away from providing the services the organisation was set up for.

Try to allow 6 weeks for people to respond to a written consultation, if it is possible to allow more time, do so.

Refer to the West Kent Compact for more information on voluntary and community sector involvement.

Paying Participants

Consider whether it is appropriate to offer some form of payment for the time spent in participating in a consultation exercise, the paragraph on page 25 sets out the issues related to payment in more detail.

Keep it Brief!

Ensure your consultation documentation follows the guidelines under ‘written information’ in terms of clarity but also look at the length of the document and supporting information. Include only what is necessary for your study.
Consulting Hard to Reach Groups

Parish newsletters and village noticeboards can assist in reaching out to the wider community. Similarly, Parish Councils may be able to help.

When targeting groups with language needs, do some early research work with local community representatives to determine the need for translated publicity materials.

Ensure publicity material is clearly presented and follows good practice guidelines for written information. Think laterally about where your target groups might find out about events happening locally. You could use community noticeboards in local shops, supermarkets or sports centres, or, depending upon your budget, radio advertisements. It might be appropriate to use specialist media for some groups. Are there community meeting points such as churches, other religious meeting points, doctors’ surgeries, schools or libraries?

It is unlikely that an internet only consultation exercise will enable you to include hard to reach groups in the borough, and while it can be a useful tool, it should be used in conjunction with other methods of consultation. Publicity of the consultation could include the promotion of free internet terminals at local libraries.

Snowball Effect

Could you employ the so called ‘snowball effect’ where community activists spread information by word of mouth?
Targeting Hard to Reach groups

By following the best practice guidelines above, your consultations have a better chance of receiving an input from a wider cross section of the community. This will not always be sufficient, however. You may want to increase representation of certain groups, or your study may only be concerned with how a specific hard to reach group views your service. On page 30 is a directory of contacts who may be able to help you reach specific groups. This directory will be kept up to date on the council’s intranet, please check the current information before making contact.

Youth Arts Projects

The programme for youth arts projects is not pre-designed. An “arts facilitator” is put into contact with young people and a range of options is discussed. The arts facilitator then finds the right artist to get involved in the project. In East Malling this led to a carving project, while a mural project was developed in Hadlow. By consulting face to face at the beginning of the process, the projects were successful in engaging and meeting the objectives of the young people involved.

Gypsies & Travellers

For the community strategy, we wanted to hear the views of Gypsies and Travellers. We worked with the Council for Voluntary Services to devise a simple questionnaire, which was used for face to face interviews by their community development worker. Engaging a voluntary sector group to carry out the consultation enabled us to obtain views which otherwise may have been impossible to hear.

Consultation Overload

The low numbers of some minority groups in the Borough can also lead to consultation overload on a few individuals if they are constantly targetted. If you are planning on targeting a specific group, it is vital to plan your consultation with care. If possible, make links with community representatives from the group early in the planning stages in order to make your consultation appropriate and maximise your chances of success.

Ensure colleagues are aware of your plans to prevent overlap, overload and open up opportunities for joint working. It is important to recognise that some community groups are consulted regularly about all sorts of issues and, due to a lack of time and resources, will only respond where they feel the subject is directly relevant to them. This should not stop you from inviting them to participate and allowing them to make the decision.

Tonbridge Skate Park

The council was approached by a group of Tonbridge skaters requesting the provision of a skate park in Tonbridge. There was a need to engage prospective users in its development from the outset. The skaters group was actively encouraged to form a fully constituted group and lead the development of the project. The group consulted the council and other interested parties on the need for a facility, site location and park design and has also engaged in fund raising. The council continues to support the group, attending their committee meetings as well as having regular informal contact. The project has been a success and it is envisaged that the Skate Park will be built in the spring of 2004.
Consulting Hard to Reach Groups

Providing Incentives

The issue of paying or providing other incentives for those participating in consultation exercises is a complex one. ‘Payment' could range from a free pen to cash sums for focus group participants. If consultation exercises are to capture the views of the widest range of people, payment in one form or another will sometimes be necessary.

Incentives you might consider include providing meals and free childcare facilities, offering ‘goodie bags’ or free items appropriate to the consultation. Competitions, free pens or discount offers can go some way in improving response rates to postal or email surveys. Postage paid envelopes are essential – people should not lose out for taking part. When choosing incentives, think about the people you are asking to become involved and what might encourage them to participate.

Where people are giving up more significant amounts of their time, for example in a series of focus groups, it is now considered good practice to offer compensation in the form of vouchers or cash payments. These payments can enable the participation of those who could not otherwise ‘afford’ to attend a meeting. You might consider paying expenses up to a fixed amount but be careful to ensure that the system for recouping expenses is straightforward and speedy.

Energy Efficiency

A questionnaire was created to find out what energy savings measures people have, or need in their homes.

By going to places such as shopping centres, fetes, fairs, and supermarkets, a large number of people were contacted. Offering free low energy lightbulbs gave a real incentive to complete the forms, and because the consultation took place face to face, help could be given where necessary.

Giving Feedback and Building Capacity

Providing timely and accurate feedback is an important part of the consultation process. You should consider the nature and extent of the feedback you intend to give during the consultation planning stage. Feedback should be sufficiently detailed to give a true picture of the results but without jeopardising the confidentiality of respondents. You should also provide information on how the results will feed into policy or practice changes.

Youth Forum

Young people can be a very difficult group to engage with. For the community strategy, we wanted to include the views of young people on the issues they felt needed tackling locally. We worked with the youth forum to devise a conference for local secondary schools. By getting young people to design the day, the format met their needs, maintained the interest of those attending and enabled us to collect some valuable information which subsequently fed into the strategy.

We have now formed strong links with the forum which enables us to hear their views more frequently and efficiently.

This will reassure people that giving their views was not a wasted effort and encourage future participation.

While one-off consultations can serve a valuable purpose, building the capacity of groups to participate in consultation will have benefits for the future. Longer term liaison arrangements can provide a way of keeping up to date with the concerns of specific groups and help the communities involved.
Consulting Hard to Reach Groups

Useful References

Good Practice Guidance – consultation with equalities groups
Scottish Executive
2002

Good Practice – a guide to consultation
Lewisham Borough Council
August 1999

Directions in Diversity
Audit Commission
November 2002

Getting it Right – guidelines on effective communication and consultation with disabled people
LARIA/Kirkless Metropolitan Council
May 2002

Senior Citizens’ Forums: a voice for older people
Help the Aged
2002

Listen-up! Effective Community Consultation
Audit Commission Management Paper
November 1999

Contacts - General Assistance and Networking

West Kent Council for Voluntary Services
19 Monson Road, Tunbridge Wells TN1 1LS
Contact: Carole Tyrrell       Telephone: 01892 530330
Provides advice and support to West Kent voluntary and community groups, publishes regular newsletters and maintains a directory of members.

Malling Area Volunteer Bureau
18 Twisden Road, East Malling, West Malling ME19 6SA
Contact: Susan Levett       Telephone: 01732 843346
Can assist with reaching out to local voluntary and community sector groups

Tonbridge Volunteer Bureau
3 St Mary’s Road, Tonbridge TN9 2LD
Contact: Alison Batchelor       Telephone: 01732 357978
Can assist with reaching out to local voluntary and community sector groups

Disabilities Groups

Tonbridge Access Group
C/o 31 Barchester Way, Tonbridge TN19 4HR
Contact: P Stibbard/P Shoebridge       Tel: 01732 358747/771365
Promotes equal access to goods and services for disabled people in the borough.

Margaret Club for the Blind
C/o 28 The Drive, Tonbridge TN9 2LP
Contact: Mrs Pamela Levett       Telephone: 01732 359609
A social club for the blind, partially sighted and their helpers.
Meets at the Angel Centre.
Consulting Hard to Reach Groups

Disabled and Sensory Impaired Group
C/o Headway, Pembury Hospital, Tunbridge Wells TN2 4QJ
Contact: Dennis Smith, Chairman
A coalition of West Kent groups with representatives various disability groups including Headway, Compaid, Parkinson Disease Society, Motor Neurone Disease, Leonard Cheshire Homes, Christians Caring, Centre for Independent Living and the Tonbridge Access Group.

Kent Association for the Blind
72 College Road, Maidstone ME15 6SJ
Contact: Les Ellis Telephone: 01622 663999
Provide a rehabilitation service for people with sight problems, plus social clubs in the community.

Hi Kent
18 Brewer Street, Maidstone ME14 1RU
Contact: Daphne Lewis Telephone: 01622 691151
Raising awareness of the needs of deaf and hearing-impaired people and offering practical support.

Spadework
Teston Road, Offham, West Malling ME19 5NA
Contact: Jane Taylor Telephone: 01732 870002
Non-residential training centre for adults with a learning disability or physical impairment.

Older People

Citizens’ Rights for Older People
Barham Court Business Centre, Teston, Maidstone ME18 5BZ
Contact: Ms J Price Telephone: 01622 812228
Providing advocacy and advice on behalf of older people.

Age Concern Malling
Rotary House, Norman Road, West Malling and 18 Twisden Road, East Malling, West Malling ME19 6SA
Contact: Pauline Nix Telephone: 01732 873977
Provide advice and information to older people in the Malling area.

Age Concern Tonbridge
5 Bradford Street, Tonbridge TN9 1DU
Contact: Mrs R M Love Telephone: 01732 366100
Provide advice and information to older people in the Tonbridge area.

Eccles Over 50s Club
66 Mackenders Lane, Eccles Aylesford ME20 7JA
Contact: Linda O’Halloran Telephone: 01622 715221
A social community club for people in Eccles, with coffee mornings for the elderly.

Younger People

West Kent Young Women’s Project
Hope House, 7 Lyon Crescent, Tonbridge TN9 1EX
Contact: Von Dawson Telephone: 01732 365831
Provides support and services for young women aged up to 30, including young mothers.

Tonbridge & Malling Youth Forum
C/o Samays, Malling Road, Snodland ME6 5HS
Contact: Ellen Garrot Telephone: 01634 240638
The youth forum meets monthly to discuss issues of concern to local young people. Links with borough secondary schools are under development.

More contacts can be found on the intranet