

**Representations received on the Submitted Statement of  
Community Involvement (Respondents 1-10)**

<b>Respondent No</b>	<b>Organisation / Company</b>
1	South East England Development Agency (SEEDA)
2	Surrey Institute of Art and Design
3	Government Office for the South East
4	South East England Regional Assembly
5	Highways Agency
6	The Countryside Agency
7	Thames Water
8	Level Limited
9	Mole Valley Green Party
10	Environment Agency



FOR OFFICIAL USE ONLY  
 RESPONDENT NO: 01  
 DATE RECEIVED: 08/06/05

# Epsom & Ewell Borough Council Statement of Community Involvement (SCI)

Representation Form for objecting to, or supporting, the Statement of Community Involvement

**Friday 3 June to Friday 15 July 2005**

Please use this form to set out your objection to, or representation in support of, the Statement of Community Involvement.

A copy of the test of soundness which will be used by the Inspector to determine whether the Statement of Community Involvement meets the required criteria is contained in Section 3 of this form.

Please use a separate form for each comment that you wish to make, completing all sections in block capitals, using black ink.

**ALL RESPONSES MUST BE RECEIVED BY 5:00PM, FRIDAY 15 JULY 2005**

Further copies of this form are available:

- on the website at [www.epsom-ewell.gov.uk](http://www.epsom-ewell.gov.uk)
- by telephoning 01372 732 393
- or you may photocopy this form.

**Please note:** In line with Regulation 31(2) (from The Town and Country Planning (Local Development) (England) Regulations 2004), upon receiving completed representations forms, Epsom & Ewell Borough Council will send an exact copy to the Secretary of State for consideration. Copies of the entire form will also be made available for public inspection at the Town Hall and local libraries as well as being available on the Council's website. Please be aware that this will include your contact details.

Please tick this box to show that you have understood the above and that you consent to your contact details being used in this way

1. CONTACT DETAILS	
Name: JANE OLIVIER	Agent's Name and Address (if applicable):
Position: Regional Planner	
Organisation: SEESA	
Address: SEESA HQ Cross Lanes Guildford	
Postcode: GU1 1YA	
E-mail: jane.olivier@seesa.co.uk	
Telephone: 01483 470197	

**2. NATURE OF REPRESENTATION** Please select one of the following:

Are you either:

Supporting <sup>all</sup> part of the SCI

If so to which part of the SCI does your representation relate:

Section title:

Page no:

Or: Objecting to part of the SCI

If so to which part of the SCI does your representation relate:

Section title:

Page no:

Or: Objecting to the omission of a section or text

If so to which part of the SCI does your representation relate:

Section title:

Page no:

**3. REASON FOR OBJECTION**

If you are objecting to the SCI please specify with an 'x', which of the following tests of soundness you consider that this part of the SCI fails (see accompanying guidance notes at end of form):

- local planning authority has complied with the minimum requirements for consultation as set out in Regulations;
- local planning authority's strategy for community involvement links with other community involvement initiatives e.g. the community strategy;
- statement identifies in general terms which local community groups and other bodies will be consulted;
- statement identifies how the community and other bodies can be involved in a timely and accessible manner;
- methods of consultation to be employed are suitable for the intended audience and for the different stages in the preparation of local development documents;
- resources are available to manage community involvement effectively;
- statement shows how the results of community involvement will be fed into the preparation of development plan documents and supplementary planning documents;
- authority has mechanisms for reviewing the statement of community involvement; and
- statement clearly describes the planning authority's policy for consultation on planning applications.

**4. CHANGES TO THE SCI**

*Please give details of what change(s) you would like to see to the SCI and why, having regard to the tests of soundness listed above (please be as precise as possible):*

(Continue on a separate sheet if necessary)

### 5. INDEPENDENT EXAMINATION

The preferred method for dealing with representations on the Statement of Community Involvement is by written representation. However, any person or organisation has the right to attend the Independent Examination and be heard. How would you wish to present your representation? (Please tick one box only.)

Written representations

Attend Examination, if so please outline why you consider this to be necessary:

#### NOTE:

Only objectors have the right to appear at public examination. If you do not wish to attend, your written representation will carry the same weight as those who appear.

The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to attend the Examination.

### 6. NOTIFICATION

Do you want to be notified when the recommendations of the person appointed to carry out the Independent Examination have been published?

Yes

No

Do you want to be notified when the Statement of Community Involvement has been adopted?

Yes

No

SIGNATURE:

*Jane Carter*

DATE:

7.6.05

Please return all completed forms to:

Susie Peck  
Planning Policy  
Epsom & Ewell Borough Council  
Town Hall  
The Parade  
Epsom  
KT18 5BY

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**Epsom & Ewell Borough Council  
 Statement of Community Involvement (SCI)**

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1. CONTACT DETAILS	
Name: ALAN COOKE	Agent's Name and Address (if applicable):
Position HEAD OF ESTATE SERVICES	
Organisation: SURREY INSTITUTE OF ART & DESIGN	
Address: FALKNER ROAD	
FARNHAM	
SURREY	
Postcode: GU7 9DS	
E-mail: acooke@Surrart-ac.uk	
Telephone: 01252-892647	

**2. NATURE OF REPRESENTATION** Please select one of the following:

Are you either:

Supporting part of the SCI

If so to which part of the SCI does your representation relate:

Section title:

Page no:

Or: Objecting to part of the SCI

If so to which part of the SCI does your representation relate:

Section title:

Page no:

Or: Objecting to the omission of a section or text

If so to which part of the SCI does your representation relate:

Section title: *Community characteristics*

Page no: *6*

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Identifying Communities within the Borough

Suggested addition to list of Communities of interest: "Schools, Colleges and Universities."

This is a large group in the Borough covering young people employees and other interested parties. It is a group that should be separately identified and included within the list of interested communities.

(Continue on a separate sheet if necessary)

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### 6. NOTIFICATION

Do you want to be notified when the recommendations of the person appointed to carry out the Independent Examination have been published?

Yes

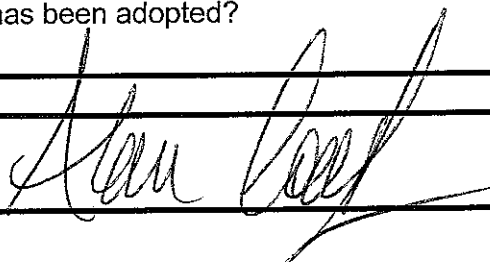
No

Do you want to be notified when the Statement of Community Involvement has been adopted?

Yes

No

SIGNATURE:

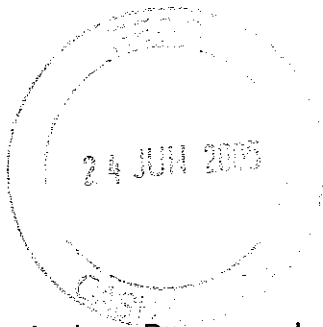


DATE: 21/06/05

Please return all completed forms to:

Susie Peck  
Planning Policy  
Epsom & Ewell Borough Council  
Town Hall  
The Parade  
Epsom  
KT18 5BY

**ALL RESPONSES MUST BE RECEIVED BY 5:00PM, FRIDAY 15 JULY 2005**



RESPONDENT No : 03  
DATE RECEIVED : 24/06/05

GOVERNMENT OFFICE  
FOR THE SOUTH EAST

Andrew Drummond  
Planning Policy  
Epsom & Ewell Borough Council  
Town Hall  
The Parade  
Epsom  
Surrey KT18 5BY

**Surrey, East & West Sussex Area Team  
Planning**

Bridge House  
1 Walnut Tree Close  
Guildford  
GU1 4GA

Switchboard: 01483 882255  
Tel: 01483 882 373  
FAX: 01483 882 284  
GTN: 3011 2373

e-mail: [philippa.sambrook@gose.gsi.gov.uk](mailto:philippa.sambrook@gose.gsi.gov.uk)  
[www.gose.gov.uk](http://www.gose.gov.uk)

Our Ref: GOSE 102/002/EPSO/SCI  
Your Ref: 50603001

21 June 2005

Dear Andrew

**EPSOM & EWELL STATEMENT OF COMMUNITY INVOLVEMENT**

Thank you for your letter of 3 June to John Cheston submitting formally the Statement of Community Involvement for Epsom & Ewell.

You have made great efforts to ensure that the consultation is inclusive and is employing a variety of methods to reach all those affected, including making documents available in other languages and Braille. Will the documents also be produced in large print and audio versions? You may also wish to give some additional thought on how those with low literacy will be able to access the Local Development Framework documents, unless you envisage this being done through group meetings.

We are pleased that your intended approach exceeds the minimum requirements in the regulations for involving the public.

I hope you find these comments helpful.

Yours sincerely

**PHILIPPA SAMBROOK**

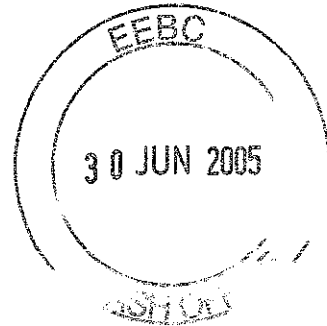


INVESTOR IN PEOPLE

RESPONDENT NO: 04  
DATE RECEIVED: 30/06/05



Ms S Peck  
Planning Assistant  
Epsom and Ewell Borough Council  
Town Hall  
The Parade  
Epsom  
Surrey KT19 5BY



28 June 2005

Dear Ms Peck,

**STATEMENT OF COMMUNITY INVOLVEMENT - SUBMISSION**  
**DRAFT**

Thank you very much for your letter inviting views on your Statement of Community Involvement Submission draft. We broadly support the contents of the draft. However, we have the following comments to make at officer level.

We would like to see reference to the regional planning context in Section 2 of the document. RPG9 is now the Regional Spatial Strategy (RSS) for the South East, and as such is part of the statutory development plan, with which local development documents must be in general conformity. You may also wish to make reference to the emerging South East Plan, which will replace RPG9 as the RSS.

The South East England Regional Assembly is a statutory consultee for development plan documents.

We would take this opportunity to remind you that under the Planning and Compulsory Purchase Act 2004, the Regional Assembly will also be a statutory consultee on planning applications for development which is of major importance for the implementation of the RSS or a relevant regional policy, or which the Assembly has given notice in writing to that local planning authority that it wishes to be consulted on. This requirement is expected to commence in Summer 2005. The Assembly's Regional Planning Committee has agreed the types of applications on which it should be consulted, and you will be notified in writing of these prior to the provisions commencing.

cont/...

You may wish to make reference to the Assembly as a statutory consultee on major planning applications in your draft SCI in anticipation of the commencement of this part of the Act.

If you require any further information, please contact Cath Rose on 01483 555235 or [catherinerose@southeast-ra.gov.uk](mailto:catherinerose@southeast-ra.gov.uk)

Yours sincerely,



 **Ray Bowers**  
**Head of Spatial Planning**



RESPONDENT No: 05

DATE RECEIVED: 30/06/05

Our ref: HA 03/02/475  
Your ref:

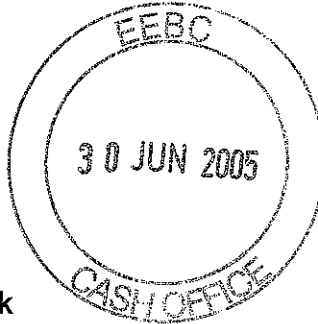
1B  
Federated House  
London Road  
DORKING RH4 1SZ

<http://www.highways.gov.uk>

Epsom & Ewell Borough Council  
Planning Policy  
Town Hall  
The Parade  
Epsom  
Surrey  
KT18 5BY

Direct Line: 01306 878238  
Fax: 01306 878147

27 June 2005



**For the attention of Susie Peck**

Dear Ms Peck

**EPSOM & EWELL BOROUGH COUNCIL  
SUBMISSION STATEMENT OF COMMUNITY INVOLVEMENT  
CONSULTATION ON THE CORE STRATEGY ISSUES AND OPTIONS**

Thank you for your letter of 3 June inviting the Highways Agency to comment on Epsom & Ewell Borough Council's Submission Statement of Community Involvement and Core Strategy Issues and Options document.

The Highways Agency does not wish to make formal representation to the Submission Statement of Community Involvement, and at this stage we have nothing to add to the comments set out in Peter Minshull's letter of 4 February in response to your initial consultation on the Local Development Framework. However we do wish to continue to be involved with your Council's Local Development Framework and I would be grateful if you will continue to address all correspondence relating to this to Peter Minshull, our Network Manager for Surrey.

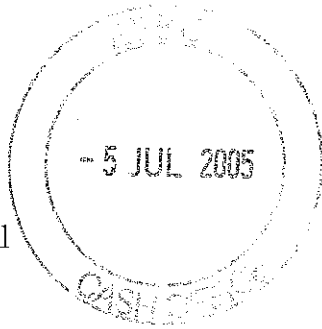
We are still considering the Core Strategy Issues and Options and will forward our comments in due course.

Yours sincerely



(Mrs) Barbara Thompson  
Network Strategy South East  
Email: [barbara.thompson@highways.gsi.gov.uk](mailto:barbara.thompson@highways.gsi.gov.uk)

Our ref  
Your ref  
Date 01 July 2005



Susie Peck  
Planning Assistant  
Epsom & Ewell Borough Council  
Town Hall, The Parade  
Epsom  
Surrey, KT18 5BY

Sterling House, 7 Ashford Road  
Maidstone, ME14 5BJ

Telephone 01622 765 222  
Fax 01622 662 102  
Sally.king@countryside.gov.uk  
www.countryside.gov.uk

*Dear Susie Peck,*

## STATEMENT OF COMMUNITY INVOLVEMENT & CORE STRATEGY

Thank you for consulting the Countryside Agency on the Council's Statement of Community Involvement and Core Strategy Issues and Options.

The Countryside Agency (Landscape, Access and Recreation Division) is the statutory body helping everyone to respect, protect and enjoy the countryside.

PPS1: Delivering Sustainable Development signals a move away from a consultation approach to planning to an inclusive, partnership based approach. The Countryside Agency endorses the emphasis placed on active engagement of communities in the new planning system. The Countryside Agency's planning principles are set out in our planning statement 'Planning Tomorrow's Countryside' (2000). Greater involvement of local communities in the planning system is one of our key principles and we have developed a number of tools and techniques to help achieve this. These include Village and Town Design Statements and Concept Statements. Village and Town Design Statements give local people a say in what new development in their village or town should look like and Concept Statements are a simple, clear expression of the way that individual sites can be developed to help bring about the kind of places that local planning authorities and their partners are seeking in their visions. Quality of Life Assessment aims to help planning authorities and others optimize policy formulation and decision-making in the pursuit of sustainable development and is a tool that can be used in facilitating community involvement in the planning process. Further information on our tools can be found at [www.countryside.gov.uk/positiveplanning](http://www.countryside.gov.uk/positiveplanning) I also enclose further information on Design Statements and Concept Statements.

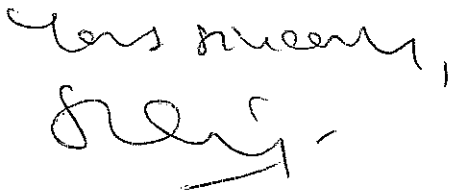


We consider that the Council's Statement of Community Involvement should set out:

- ways of involving all sectors of the community, including those in smaller settlements and rural areas who may have difficulty in accessing some methods used to engage communities;
- the particular approaches or techniques that will be used to ensure that rural communities have the opportunity to engage fully with the LDF process;
- how local community initiatives such as Town and Village Design Statements as well as other local evidence or survey work provided by local communities will be used to inform the LDF and the weight that such community initiatives will be given by the Council;
- how the influence of local community involvement on policy development will be monitored.

Whilst the Countryside Agency is a specific consultation body on LDFs, we have limited resources and are unable to comment fully at every stage or on every LDF. We have just published guidance, jointly with English Nature, English Heritage and the Environment Agency setting out how our interests can be accommodated within LDFs. We are also currently preparing a series of planning position statements to assist local planning authorities with plan preparation. The joint guidance and the position statements are available on our website.

I attach your completed Representation Form for the Statement of Community Involvement and Core Strategy: Issues and Options questionnaire. Please contact me if you have any queries ([sally.king@countryside.gov.uk](mailto:sally.king@countryside.gov.uk))

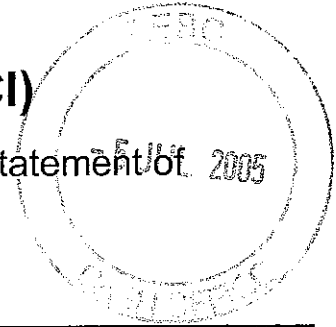


Sally King  
Planning Team

FOR OFFICIAL USE ONLY
RESPONDENT NO:
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1. CONTACT DETAILS	
Name: SALLY KING	Agent's Name and Address (if applicable):
Position: POLICY ADVISER	
Organisation: COUNTRYWIDE AGENCY	
Address: 20TH FLOOR PORTLAND HOUSE, STACT PLACE, LONDON SW1E 5RS	
Postcode: SW1E 5RS	
E-mail: <a href="mailto:Sally.King@countrywide.gov.uk">Sally.King@countrywide.gov.uk</a>	
Telephone: 0202 521381/0207 828 2212	

**2. NATURE OF REPRESENTATION** *Please select one of the following:*

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#### 4. CHANGES TO THE SCI

Please give details of what change(s) you would like to see to the SCI and why, having regard to the tests of soundness listed above (please be as precise as possible):

Include how particular community initiatives  
such as Town and Village Design Statements  
will inform the LDF.

(Continue on a separate sheet if necessary)

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Yes

No

Do you want to be notified when the Statement of Community Involvement has been adopted?

Yes

No

**SIGNATURE:**

*Alan*

**DATE:** 1/7/05

Please return all completed forms to:

Susie Peck  
Planning Policy  
Epsom & Ewell Borough Council  
Town Hall  
The Parade  
Epsom  
KT18 5BY

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**Susie Peck**

Planning Policy  
Epsom & Ewell Borough Council  
Town Hall  
The Parade  
Epsom  
KT18 5BY

Thames Water Property Services

Your ref  
Our ref 8042/27/DW/gac  
Name Georgie Cook  
Phone 0118 - 373 8054  
Fax 0118 - 373 8009  
E-Mail [georgie.cook@thameswater.co.uk](mailto:georgie.cook@thameswater.co.uk)

4 July 2005

**Re: Epsom & Ewell Borough Council Statement of Community Involvement (SCI)**

Dear Sir or Madam:

Thank you for consulting Thames Water on the above. Thames Water are the statutory sewerage undertaker for the whole Borough and the statutory water undertaker for the western part of the Borough.

The importance of considering such water and sewerage infrastructure provision in the new LDF is highlighted by paragraph 4.9 of the new PPS12 which states that in preparing Local Development Documents:

***“LPAs should ensure that delivery of housing & other strategic and regional requirements is not compromised by unrealistic expectations about the future availability of infrastructure, transportation and resources. Annex B sets out further guidance on resources, utilities and infrastructure provision.”***

Paragraphs B3 to B8 of PPS12 also place specific emphasis on the need to take account of infrastructure such as sewerage early on in preparing Local Development Documents. Paragraph B3 in particular states: ***“The provision of infrastructure is important in all major new developments. The capacity of existing infrastructure and the need for additional facilities should be taken into account in the preparation of all local development documents. Infrastructure here includes water supply and sewers, waste facilities.....”***

Regulation 25 of the Town & Country Planning (Local Development) Regulations 2004 relates to pre-submission consultation. It states that LPAs must consult **“specific consultation bodies”** prior to the publication of a first draft Development Plan Document (DPD). The interpretation in Part 1 of the Regulations states that sewerage and water undertakers constitute “specific

Thames Water Plc  
Clearwater Court, Grnd Floor  
East, Vastern Rd, Reading, Berks  
RG1 8DB  
T 0118 - 373 8093  
F 0118 - 373 8009  
I [www.thames-water.com](http://www.thames-water.com)

Registered in England and Wales  
No. 2366623, Registered office  
Clearwater Court, Vastern Road, Reading  
Berks. RG1 8DB



consultation bodies". We consider that a list of such consultees is essential to provide clarity in the SCI and are therefore very surprised that that Appendix 2 of the original draft SCI has been removed. We consider that Appendix 2 – "Consultation Groups" should be reinstated and should make reference to Thames Water being a "specific consultation body"

It will be essential to ensure that the introduction of a portfolio of Local Development Documents (LDDs) does not prejudice adequate planning for water and sewerage infrastructure provision as this is an essential pre-requisite for development.

When carrying out the necessary early consultations with Thames Water regarding the capacity of water and sewerage systems in accordance with the new Regulations, adequate time should be allowed to consider development options and proposals so that an informed response can be formulated. It is not always possible to provide detailed responses within a matter of weeks for example, the modelling of water and sewerage infrastructure systems will be important to many consultation responses and this can take a long time to carry out (for example modelling of sewerage systems can be dependant on waiting for storm periods when the sewers are at peak flows).

We also have to consult with the Environment Agency to obtain a clear picture as to possible water abstraction and waste water discharge consent limits prior to undertaking modelling from a treatment perspective. This process itself can take a considerable period of time especially if it depends on the EA undertaking its own evaluation exercise. Therefore, realistic consultation periods with water and sewerage undertakers will need to be taken account of in the preparation of the LDDs.

In relation to consultation on Planning Applications, Thames Water would expect to be consulted on most major planning applications. Paragraph B4 of PPS12, states that **"the adequacy of infrastructure can be a material consideration in deciding whether permission should be granted"**. Paragraph 22 of the PPS23, 2004, states at Appendix A that the following should be considered in the preparation of development plans and can be material in the consideration of individual planning applications:

- The provision of sewerage and sewage treatment and the availability of the existing sewerage infrastructure
- The need to make suitable provision for the drainage of surface water
- Compliance with water quality objectives

Thames Water published and circulated in Summer 2004 to all LPAs in our area a **"Guide for LPAs on Planning Application & Development Plan**



Page 3

**Consultation with Thames Water Utilities as Statutory Water and Sewerage Undertaker**". This will be off assistance to when determining which planning applications to consult Thames Water on.

Yours Faithfully

A handwritten signature in black ink, appearing to read "Georgie Cook".

Georgie Cook  
Planning Administrator  
**Thames Water Property Services.**

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Representation Form for objecting to, or supporting, the Statement of Community Involvement

**Friday 3 June to Friday 15 July 2005**

Please use this form to set out your objection to, or representation in support of, the Statement of Community Involvement.

A copy of the test of soundness which will be used by the Inspector to determine whether the Statement of Community Involvement meets the required criteria is contained in Section 3 of this form.

Please use a separate form for each comment that you wish to make, completing all sections in block capitals, using black ink.

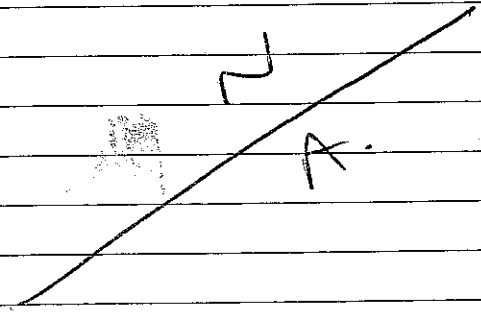
**ALL RESPONSES MUST BE RECEIVED BY 5:00PM, FRIDAY 15 JULY 2005**

Further copies of this form are available:

- on the website at [www.epsom-ewell.gov.uk](http://www.epsom-ewell.gov.uk)
- by telephoning 01372 732 393
- or you may photocopy this form.

**Please note:** In line with Regulation 31(2) (from The Town and Country Planning (Local Development) (England) Regulations 2004), upon receiving completed representations forms, Epsom & Ewell Borough Council will send an exact copy to the Secretary of State for consideration. Copies of the entire form will also be made available for public inspection at the Town Hall and local libraries as well as being available on the Council's website. Please be aware that this will include your contact details.

Please tick this box to show that you have understood the above and that you consent to your contact details being used in this way

1. CONTACT DETAILS	
Name: <u>MS GEORGIE COOK</u>	Agent's Name and Address (if applicable):
Position: <u>PLANNING ADMINISTRATOR</u>	
Organisation:	
Address: <u>Thames Water Property Services Ltd</u> <u>Clearwater Court</u> <u>Ground Floor East</u> <u>Vestern Road</u> <u>Reading</u> <u>Berkshire RG1 8DB</u>	
Postcode:	
E-mail: <u>georgie.cook@thameswater.co.uk</u>	
Telephone: <u>0118 - 373 8054</u>	

**2. NATURE OF REPRESENTATION** Please select one of the following:

Are you either:

Supporting part of the SCI

If so to which part of the SCI does your representation relate:

Section title:

Page no:

PLEASE SEE ATTACHED  
LETTER

Or: Objecting to part of the SCI

If so to which part of the SCI does your representation relate:

Section title:

Page no:

Or: Objecting to the omission of a section or text

If so to which part of the SCI does your representation relate:

Section title:

Page no:

**3. REASON FOR OBJECTION**

If you are objecting to the SCI please specify with an 'x', which of the following tests of soundness you consider that this part of the SCI fails (see accompanying guidance notes at end of form):

- local planning authority has complied with the minimum requirements for consultation as set out in Regulations;
- local planning authority's strategy for community involvement links with other community involvement initiatives e.g. the community strategy;
- statement identifies in general terms which local community groups and other bodies will be consulted;
- statement identifies how the community and other bodies can be involved in a timely and accessible manner;
- methods of consultation to be employed are suitable for the intended audience and for the different stages in the preparation of local development documents;
- resources are available to manage community involvement effectively;
- statement shows how the results of community involvement will be fed into the preparation of development plan documents and supplementary planning documents;
- authority has mechanisms for reviewing the statement of community involvement; and
- statement clearly describes the planning authority's policy for consultation on planning applications.

**4. CHANGES TO THE SCI**

*Please give details of what change(s) you would like to see to the SCI and why, having regard to the tests of soundness listed above (please be as precise as possible):*

PLEASE SEE ATTACHED

(Continue on a separate sheet if necessary)

### 5. INDEPENDENT EXAMINATION

The preferred method for dealing with representations on the Statement of Community Involvement is by written representation. However, any person or organisation has the right to attend the Independent Examination and be heard. How would you wish to present your representation? (Please tick one box only.)

Written representations

Attend Examination, if so please outline why you consider this to be necessary:

**NOTE:**

Only objectors have the right to appear at public examination. If you do not wish to attend, your written representation will carry the same weight as those who appear.

The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to attend the Examination.

### 6. NOTIFICATION

Do you want to be notified when the recommendations of the person appointed to carry out the Independent Examination have been published?

Yes

No

Do you want to be notified when the Statement of Community Involvement has been adopted?

Yes

No

SIGNATURE:



DATE:

4.7.05

Please return all completed forms to:

Susie Peck  
Planning Policy  
Epsom & Ewell Borough Council  
Town Hall  
The Parade  
Epsom  
KT18 5BY

**ALL RESPONSES MUST BE RECEIVED BY 5:00PM, FRIDAY 15 JULY 2005**



FOR OFFICIAL USE ONLY

RESPONDENT NO: 08

DATE RECEIVED: 12/07/05

## Epsom & Ewell Borough Council Statement of Community Involvement (SCI)

Representation Form for objecting to, or supporting, the Statement of  
Community Involvement

**Friday 3 June to Friday 15 July 2005**

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**Please tick this box to show that you have understood the above and that you consent to your contact details being used in this way**

1. CONTACT DETAILS	
Name: Liz Weaver	Agent's Name and Address (if applicable):
Position: Planning and Policy Research Officer	
Organisation: Level Limited	
Address: Leigh House,	
147 Leigh Road,	
Wimborne	
Dorset	
Postcode: BH21 2AD	
E-mail: <a href="mailto:policy@level.co.uk">policy@level.co.uk</a>	
Telephone: 01202 639 444	

**2. NATURE OF REPRESENTATION** *Please select one of the following:*

Are you either:

Supporting part of the SCI

*If so to which part of the SCI does your representation relate:*

Section title:

Page no:

Or: Objecting to part of the SCI

*If so to which part of the SCI does your representation relate:*

Section title: Community Groups to be Consulted in the LDF and Methods

Page no: 15 Section: 2.1.5

Or: Objecting to the omission of a section or text

*If so to which part of the SCI does your representation relate:*

Section title:

Page no:

**3. REASON FOR OBJECTION**

*If you are objecting to the SCI please specify with an 'x', which of the following tests of soundness you consider that this part of the SCI fails (see accompanying guidance notes at end of form):*

- local planning authority has complied with the minimum requirements for consultation as set out in Regulations;*
- local planning authority's strategy for community involvement links with other community involvement initiatives e.g. the community strategy;*
- statement identifies in general terms which local community groups and other bodies will be consulted;*
- statement identifies how the community and other bodies can be involved in a timely and accessible manner;*
- methods of consultation to be employed are suitable for the intended audience and for the different stages in the preparation of local development documents;*
- resources are available to manage community involvement effectively;*
- statement shows how the results of community involvement will be fed into the preparation of development plan documents and supplementary planning documents;*
- authority has mechanisms for reviewing the statement of community involvement; and*
- statement clearly describes the planning authority's policy for consultation on planning applications.*

#### 4. CHANGES TO THE SCI

Please give details of what change(s) you would like to see to the SCI and why, having regard to the tests of soundness listed above (please be as precise as possible):

What way the SCI or part of the SCI is not sound, having regard to the tests set out in part 3 of the form?

Levvel is concerned that based on the information provided to date the draft SCI fails to properly identify "in general terms which local community groups and other bodies will be consulted". As the Council is aware early consultation is central to the new LDF system. The Council have drafted a SCI which is intended to set out how the Council will involve stakeholders and the local community in the LDF process and in planning applications. Levvel is concerned that whilst many local community groups and other bodies are cited the development industry, comprising industry representative bodies, landowners, developers and house builders, fail to be identified as a group that will be targeted for consultation.

What evidence is there to support why the SCI should be changed?

Levvel considers the views of the development industry to be an important consideration for local authorities given the industry's critical role in the local delivery of development. The importance of engaging developers is recognised in national guidance, for example:

- Paragraph 4.1 of PPS12 states "It is essential that anyone who has an interest in the planning of an area actively seeks to assist the local planning authority to shape the future of that area from the earliest stage, both at the core strategy level as well as at the detailed area action level". Participants specifically cited as being important are "national organisations, government agencies, regional organisations, **developers**, local organisations, local community groups and the community" (our emphasis).
- Checklist 8g in the Companion Guide to PPS12 refers to the site allocation process where local authorities are encouraged to "hold discussions at an early stage with **developers, landowners** and the community"(our emphasis)
- Paragraph 4.4 of PPS12 which recognises the importance of early discussions to include developers in an attempt to reduce the potential for conflict later in the planning process

From our experience there is a risk that the development industry are not yet fully appreciative of the change in emphasis to a front loaded consultation process and as such could fail to be involved in the options appraisal and core strategy elements of the new process. It is considered to be critical that the development industry is specifically cited in an attempt to ensure those developers with a local interest are given the opportunity to understand local authorities policy objectives and have the opportunity for their views to be given due consideration at all stages of LDF process. In turn this could have the benefit of reducing the potential for conflict later in the planning process.

Furthermore, members of the development industry are considered to hold valuable information relating to the local housing and commercial property market which local authorities would benefit from drawing upon to help inform the local evidence base. Failure to take into consideration such evidence would risk authorities making policy decisions without ensuring a full understanding of local issues and needs and could call into question the soundness of the development plan document.

Proposed changes to the SCI

Levvel seek landowners and developers to be explicitly cited in the Statement of Community Involvement as a specific group to be targeted for consultation at all stages of the LDF process. This could be achieved by amending the draft SCI to include specific reference to the development industry in section E of Table 3.

(Continue on a separate sheet if necessary)

### 5. INDEPENDENT EXAMINATION

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Written representations

Attend Examination, if so please outline why you consider this to be necessary:

**NOTE:**

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The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to attend the Examination.

### 6. NOTIFICATION

Do you want to be notified when the recommendations of the person appointed to carry out the Independent Examination have been published?  Yes  No

Do you want to be notified when the Statement of Community Involvement has been adopted?  Yes  No

**SIGNATURE:**



**DATE:** 27/06/05

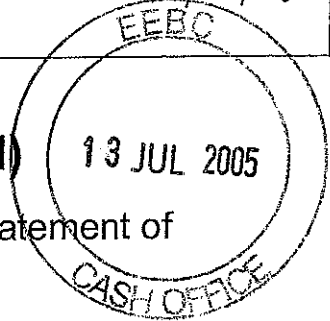
Please return all completed forms to:

Susie Peck  
Planning Policy  
Epsom & Ewell Borough Council  
Town Hall  
The Parade  
Epsom  
KT18 5BY

**ALL RESPONSES MUST BE RECEIVED BY 5:00PM, FRIDAY 15 JULY 2005**

FOR OFFICIAL USE ONLY  
RESPONDENT NO: 09  
DATE RECEIVED: 13/07/05

**Epsom & Ewell Borough Council  
Statement of Community Involvement (SCI)**



Representation Form for objecting to, or supporting, the Statement of Community Involvement

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Please tick this box to show that you have understood the above and that you consent to your contact details being used in this way

1. CONTACT DETAILS	
Name: DAVID SHELDON	Agent's Name and Address (if applicable):
Position:	
Organisation: MOLE VALLEY GREEN PARTY	
Address: 701 EASTDEAN AVENUE EPSOM	
Postcode: KT18 7SN	
E-mail: d.sheldon@amsolve.com	
Telephone: 01372 724652	

**2. NATURE OF REPRESENTATION** Please select one of the following:

Are you either:

Supporting part of the SCI

If so to which part of the SCI does your representation relate:

Section title: *All sections*

Page no:

Or: Objecting to part of the SCI

If so to which part of the SCI does your representation relate:

Section title:

Page no:

Or: Objecting to the omission of a section or text

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Section title:

Page no:

**3. REASON FOR OBJECTION**

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#### 4. CHANGES TO THE SCI

Please give details of what change(s) you would like to see to the SCI and why, having regard to the tests of soundness listed above (please be as precise as possible):

The whole document is unnecessarily complicated, <sup>in my view</sup>  
However, if it results in bad planning  
decisions being avoided or open to full  
public scrutiny at the earliest opportunity  
then I approve it.

(Continue on a separate sheet if necessary)

### 5. INDEPENDENT EXAMINATION

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### 6. NOTIFICATION

Do you want to be notified when the recommendations of the person appointed to carry out the Independent Examination have been published?

Yes

No

Do you want to be notified when the Statement of Community Involvement has been adopted?

Yes

No

SIGNATURE:

*D. L. L. L.*

DATE:

10/7/05

Please return all completed forms to:

Susie Peck  
Planning Policy  
Epsom & Ewell Borough Council  
Town Hall  
The Parade  
Epsom  
KT18 5BY

**ALL RESPONSES MUST BE RECEIVED BY 5:00PM, FRIDAY 15 JULY 2005**

RESPONDENT No 10

DATE RECEIVED: 14/07/05



**Environment  
Agency**

**Our Ref :** FM/2005/003858-3/1

**Your Ref :** N/A

**Date :** 14 July 2005

Planning & Engineering Services  
Epsom & Ewell Borough Council  
Town Hall  
The Parade  
Epsom  
Surrey  
KT18 5BY

FAO: Ms Susie Peck

Dear Madam

**STATEMENT OF COMMUNITY INVOLVEMENT LOCAL DEVELOPMENT  
FRAMEWORK**

Thank you for your invitation to respond to this document.

We have no comments to make on consultation regarding LDFs but have the following comments in relation to Planning Applications and Major Planning Applications.

We welcome pre-application discussions, particularly in regard to major sites (2.2.2).

However, we feel that Epsom & Ewell might not be aware of the scope of the Environment Agency's assistance in dealing with forward planning, development control, pre-application advice, planning applications and appeals. The Environment Agency's planning work aims to both protect and enhance the environment. We influence planning through legislation, policy, regional planning, plans and individual schemes. Areas of interest include water resources, waste and reducing harm from flooding.

Our 'Working Better Together in Town & Country Planning' protocol is aimed at providing a framework for technical co-operation between the Environment Agency and Local Authorities and to help benchmark good practice. If you would like to know more about this protocol please call Mr Ben King (Technical Specialist) on 0207 091 4003 for further information.

Yours faithfully

**SUSAN SHEAHAN**  
**Planning Officer**

A handwritten signature in black ink that reads "Susan Sheahan". The signature is written in a cursive, slightly slanted style.