

Local Development Framework Ealing Statement of Community Involvement (SCI)

SUBMISSION STAGE REPRESENTATION FORM

This form should be used for making all representations on the Ealing Statement of Community Involvement.

Personal Details

Title	Mr
First Name	Will
Last Name	French
Job Title	
Organisation	Save Ealing's Streets
Address Line 1	5 Gordon Road
Line 2	Ealing
Line 3	
Line 4	
Post Code	W5 2AD
Telephone Number	
E-mail Address (where relevant)	Will.french@ntlworld.com

Agents Details (if applicable)

Nature of Representation

Please select one of the following:

Are you either:

☐

Supporting part of the SCI; NO

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

Section

Paragraph

☐

Or: Objecting to part of the SCI; YES

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

Section

3.1

Paragraph

Second bullet and para following

☐

Or: Objecting to the omission of a section or text YES

If so where should the new section or text go in the SCI (please be as precise as possible):

As above

Reason for Objection

An independent Planning Inspector will assess whether the SCI is “sound” as part of the Public Examination. If you are objecting to the SCI please specify on which of the following tests of soundness you consider that this part of the SCI **fails** (see accompanying guidance notes):

☐

It complies with the minimum requirements for consultations as set out in the Town and Country Planning (Local Development) (England) Regulations 2004

FAIL

Its strategy for community involvement links with other community involvement initiatives (e.g. the community strategy)

☐

It identifies in general terms which local community groups and other bodies will be consulted

FAIL

It identifies how the community and other bodies can be involved in a timely and accessible manner

☐

The methods of consultation to be employed are suitable for the intended audience and for the different stages in the preparation of local development documents

FAIL

Resources are available to manage community involvement effectively

FAIL

It shows how the results of community involvement will be fed into the preparation of development plan documents and supplementary planning documents

FAIL

It sets out a mechanism for reviewing the SCI

☐

It clearly describes the policy for consultation on planning applications

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 precise as possible):

Save Ealing Street's (SES's) objections relate to the Council's decision to exclude the West London Tram (WLT) from the scope of the SCI and the wider LDF process.

WLT is a £650 million investment in a light railway that will run along the Uxbridge Road from Shepherds Bush to Uxbridge. It is a TfL project with Ealing Council in the process of signing up as a joint promoter. With an impact that will extend across the entire borough and with the community having raised repeated concerns about the scheme over the past 5 years, this is a development that should form part of Ealing Council's core strategy. And as such it should also fall within the scope of the SCI. With the design of the scheme now quite well advanced, it is essential that there should be a well set out programme of public engagement in accordance with the principles contained in Para 1.3 of the SCI.

Unfortunately no such programme exists. In responding in its pre-submission consultation statement to SES's suggestion that there should be one, the Council insists that consultation on the tram is outside the remit of the SCI and the LDF.

SES believes this argument is not in accordance with National Guidance on the content of LDFs nor with the principles that the Council claims it is pursuing under the SCI.

Amongst changes to the SCI that SES thinks should be made are a specific reference to the tram as a development that would be included as a Core documents in the LDF, and a definition of 'spatial' planning that contains references to strategic transport planning and major transport projects. We also think it would be desirable for the Council to indicate its intention as an immediate priority to draw up a clear strategy to consult on the tram following the principles set out in para 1.3 of the SCI.

Can your representation be considered by written representations or do you consider it necessary to attend the Examination?

Either: ☐ Written Representations

Or: ☒ Yes Attend Examination. Please outline why you consider this to be necessary:

This is a complicated matter with several years of discussion behind it. The issues will be most easily explored through examination rather than through lengthy exchanges of written representations.

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

Signature:

Will French

Date:

16 February 2006

Please complete and return this form by post or email (planpol@ealing.gov.uk) to:

**Planning Policy and Development Advice Section, Ealing Council, Fifth Floor, Perceval House,
14-16 Uxbridge Road, Ealing W5 2HL**

Please return all completed forms by **5pm, 17 February 2006**. Each form will be acknowledged and responded to. The Council may not be able to take your comments into account if they are received later than 17 February 2006.

Guidance Note: Making Representations on the Statement of Community Involvement (SCI)

This guidance note was issued as part of a consultation draft by the Planning Inspectorate entitled: 'A Framework for assessing soundness and focussing representations on Statements of Community Involvement' February 2005.

If you wish to object to the SCI or part of the SCI, you should make it clear in what way the SCI or part of the SCI is not sound, having regard to the tests set out on the representation form. You should try to support your objection by evidence showing why the SCI should be changed. It will be helpful if you also say precisely how you think the SCI should be changed. In considering whether you wish to make representations on a SCI, you may wish to consider the following principles for community involvement which are set out in the document "Community Involvement in Planning: The Government's objectives"¹.

Principles of community involvement:

Community involvement that is appropriate to the level of planning. Different arrangements for and levels of community involvement will be appropriate depending on the nature of the planning process involved and the authority's circumstances. Planning authorities should ensure that arrangements are built on a clear understanding of the needs of the community, and put in place arrangements which are fit for purpose.

Front loading of involvement. Community involvement policies should provide opportunities for participation in identifying issues and debating options from the earliest stages. Community involvement should happen at a point at which people recognise that they have the potential to make a difference and, crucially, to experience a sense of ownership of local policy decisions.

The methods used to encourage involvement should be relevant to their experience. Consideration should be given to how people are most likely to get involved and what facilities are available to them, and to working with agencies such as Planning Aid that can help communities. There is no 'one size fits all' solution if a genuine dialogue is to be established and maintained.

Clearly articulated opportunities for continuing involvement. The process should allow local communities to see how ideas have developed at the various stages, with effective feedback. There should be clear formal stages when involvement should take place, based on the statutory requirements. These stages must occur as part of a continuous programme, not a series of disjointed, one off steps. A 'tick box' mentality, which regards community involvement as simply a process step to be ticked off, is not acceptable.

Transparency and accessibility. The process should be clear, so that people know when they will be able to participate, and the ground rules for doing so. Involvement in the planning system should extend beyond those who are familiar with the system, to difficult to reach groups.

Planning for involvement. Community involvement should be planned in from the start of the process for plan preparation or consideration of significant development proposals, to enable timely involvement. Consideration should be given to how processes for community involvement in planning can best fit with other involvement processes, particularly in respect of Community Strategies. Project plans should avoid unnecessarily long, drawn out processes.

¹ Published by ODPM in 2004 and available on the ODPM website www.odpm.gov.uk.