

**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                   |                        | Agents Details (if applicable) |
|------------------------------------|------------------------|--------------------------------|
| Title                              | MR.                    |                                |
| First Name                         | JULIAN                 |                                |
| Last Name                          | EDMONDS                |                                |
| Job Title                          | CHAIR                  |                                |
| Organisation                       | CENTRAL EALING         |                                |
| Address Line 1                     | RESIDENTS' ASSOCIATION |                                |
| Line 2                             | 44 HAVEN LANE          |                                |
| Line 3                             | EALING                 |                                |
| Line 4                             | LONDON                 |                                |
| Post Code                          | W5 2HN                 |                                |
| Telephone Number                   | 020 8997 5912          |                                |
| E-mail Address<br>(where relevant) | N/A                    |                                |

**Nature of Representation**

Please select one of the following:

Are you either:

Supporting part of the SCI; *See comments/changes attached*

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

Section

Paragraph

See Comments /   
Changes attached

See comments /   
changes attached

Or: Objecting to part of the SCI;

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

Section

Paragraph

Or: Objecting to the omission of a section or text

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

**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
- 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
- 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
- Resources are available to manage community involvement effectively
- It shows how the results of community involvement will be fed into the preparation of development plan documents and supplementary planning documents
- 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):

COMMENTS AND CHANGES PROPOSED  
(SPECIFIC OR MORE GENERAL) SUBMITTED  
ON 5 PAGES ATTACHED - SUBMISSION OF  
CENTRAL EALING RESIDENTS' ASSOCIATION

(Continue on a separate sheet if necessary)

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

Either:  Written Representations

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

DISCUSSION AT EXAMINATION LIKELY  
TO ARRIVE AT AREAS OF AGREEMENT

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

Signature:



Date:

20/2/06

Please complete and return this form by post or email ([planpol@ealing.gov.uk](mailto: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.

**CENTRAL EALING RESIDENTS' ASSOCIATION**  
**Statement of Community Involvement**  
**Submission stage representation : February 2006**

**Page**

4. Response Centre hours are insufficient to serve the needs of many people, especially those who work. Proper consideration of planning applications often requires time to be spent with documents, maps and , particularly, the full - size drawings. Similarly, exhibitions need to be mounted in locations and with timings accessible to such people.

5. (see also p.8 & p.11) To describe 41.3% of Ealing's population as 'hard to reach' community groups is simply inaccurate. Many (representative) **groups** are known to the Council, so the observation really seems to apply to individuals. However, even this remains misleading ( and patronising) since it suggests that all the people identified ( as in the breakdown on p.8) are difficult to communicate with. The further implication is that the remaining 58.7% of the Borough's population is comparatively easy to reach. But on p.11, yet more 'hard to reach' groups are cited which , if working people ('who lack the time') are included, must effectively mean that almost everybody in Ealing fits the definition. Much greater precision is needed to inform effective communication/consultation strategies.

6. Indications required of the supportive mechanisms by which, **in practice**, communities will **be** (not "feel") able to hold developers accountable.

9. General Consultation Bodies do not usually meet with great frequency and hence it is vital that “enough time” (para.2) should be given for a “considered response”. 21 or 14 days (for planning/amended applications) would offer sufficient time only by chance.

10. The database of community contracts and/or the register of consultees are apparently not always accurate or up to date. Resources need to be channelled to remedying, and subsequently maintaining, this.

12. Table 1 - the communication methods are very arbitrarily assigned. e.g. ‘Around Ealing’ only for Core Strategy DPD and only for people lacking “time/resources”, e.g local radio advertising inconsistently inserted, etc.

13. Last para. - commitment to better co-ordination is greatly welcomed. However, robust mechanisms are needed to manage officers’ own agendas and timetables/targets as well as those arising externally, e.g. from developers or transport scheme promoters, where overlapping timings can be expected to burden community and other consultees unreasonably.

14. Sustainable development definition (probably because it is borrowed from the Community Strategy) is inadequately organised to have clear meaning in the planning and site development context. As phrased here, it proffers both nebulous and potentially contradictory guidance. Sustainable development is the most critical matter (and frequently mentioned in the document) and so requires much more exacting and far-sighted (‘future-proof’) definition.

15. para.2 - LDF reports **should** (not “may”)be taken to Area Committees.

Last line - appendix 2 should read 3.

19. SCI re. experience of procedures. There is a shortage of experienced planning officers and they often lack knowledge of the locality/context of a proposed development. Lack of continuity, with possibly several officers considering revised applications submitted for the same location over months, sometimes years, causes difficulty.

Planning enforcement is seriously understaffed and so abuse on the part of developers is seen as widespread, to the frustration of the residents affected. It needs to move from a largely re-active function to become a much more pro-active service.

20 & 21. -several references to Table 1 (“below”) are followed by Table 2 (p.22 on).

36. More involvement of local community/amenity groups at the pre-application stage (including many seemingly small-scale developments) should reduce the number of unsatisfactory applications put forward. It is a concern how many of these (particularly sequential applications) cause anxiety and inconvenience to objectors but are, in the event, refused under delegated powers.

37. Table 4 - smaller developments often disproportionately affect local communities and “**advisable**/where appropriate” would better address this. The major applications threshold should be reduced to e.g.5 or more units or 500 sqm. (In the present table 4, the third column should be headed ‘10 or more units’).

38. (page not numbered). Para.4 - propose that “**may**” is substituted for “will” in both sentences. **Additional sentence proposed** : “Nevertheless, all applicants will be advised of the potential benefits of pre-application discussions as described above”.

39. 4.5 - and also p.42, 4.10. 21 days is an insufficient notice period and 14 days for (often substantially) amended plans even more so. This is particularly the case since many applicants choose to time their notification for the Summer or Christmas holiday periods. 21 **working** days is more realistic.

40. 4.6 - comments as for 4.5 with the added fact that only a small proportion of households buy the Ealing Gazette and an even smaller number will examine the Public Notices. More effective press notification should be investigated. String-tied site notices are often removed or damaged so more substantial frames and fastenings would improve this form of notification.

43. para 3. - “...limited opportunity for public speaking ...” is not defined as three minutes. Such an apparently arbitrarily brief time limit is insufficient to describe the objections to many applications. This is even more the case where the objector wishes to propose and, of necessity explain, (additional) conditions rather than simply seek refusal.

48. Experience is of a seriously under- resourced Conservation Section. There are outstanding matters held over from the last review and it is likely to be counter-productive if these were to be reserved for the next review. “Every 5-10 years” for review is too imprecise and fixing 5 year intervals is proposed.

62. Appendix 2(d). Propose “**internal or/boundary fencing**” (re.views in), and notification of properties opposite. Experience is that, for almost every application, neighbour notification has been insufficient to reach many of those who have an interest. This is a frequent cause of discontent and ,for it to be addressed ,the notifications proposed should be extended to substantially more properties on all sides of the development site. This Appendix is very hard to follow and would be improved with graphic representations of the options.

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