

**Development Management DPD**  
**Initial Proposals Consultation Report**  
**22 March 2012**

# 1 Introduction

- 1.1 This statement sets out which bodies and persons were invited to make representations on the preparation of the Development Management Development Plan Document (DM DPD) under Regulation 25 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. It identifies how bodies and persons were invited to make representations, summarises the main issues raised, and briefly explains how those issues will be addressed in the Final Proposals DM DPD.

## Background

- 1.2 The Development Management DPD supports the delivery of the Development Strategy by managing the development proposals that the Council receives in its statutory capacity as a Local Planning Authority to maximise their positive outcomes. The final document will be structured as an addition to the London Plan 2011, which forms part of the development plan of all London Boroughs.
- 1.3 In accordance with Regulation 25, the Council undertook formal public consultation on the Development Management Initial Proposals from September to November 2010. This consultation was originally scheduled to last for six weeks from 17 September to 30 October 2010; in response to requests from a number of organisations the Council extended the consultation closing date to 30 November 2010.
- 1.4 This consultation provided more than 10 weeks for businesses, community/voluntary groups, residents and statutory organisations to make representations on the content of the Initial Proposals for the Development Management DPD.
- 1.5 The Initial Proposals were also informed by comment received during three earlier rounds of formal public consultation relating to Ealing's LDF: Issues and Options for Spatial Planning (February to March 2006); New Issues and Options for Planning Your Borough: Strategy and Sites (September to October 2007); the Development Strategy Initial Proposals (September to October 2009); and the draft policies of the proposed Replacement London Plan (2009).

## Consultation

- 1.6 The following consultation methods were used in accordance with processes set out in the Regulations and in the Council's adopted Statement of Community Involvement (SCI):
- Publication of the Development management Initial Proposals document and its availability for inspection at the council's Customer Services Centre, Perceval House and all of the borough's twelve libraries (Acton, Ealing Central, Greenford, Hanwell, Jubilee Gardens, Northfields, Northolt, Perivale, Pitshanger, Southall, West Ealing and Wood End) and its distribution to key statutory bodies and other consultees

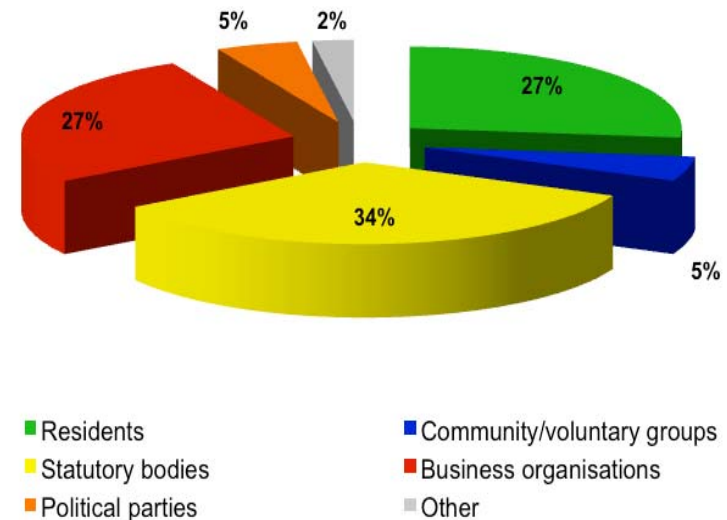
- Announcement of the consultation process and availability of the Development Management Initial Proposals, summary leaflet and additional material on the Council's website
- A public notice advertising the consultation published in the local "Ealing Gazette" newspaper at the commencement of the consultation period
- Letters or emails to a wide selection of amenity and residents groups, businesses and individuals on the council's LDF consultation database
- Leaflets available at the various information points listed above and distributed with letters or various public events
- An article and associated announcement of the consultation process in Around Ealing which is delivered to every address in the borough
- A briefing note and copies of the leaflets distributed through ward forums
- 10 evening public meetings, including two themed meetings on transport and infrastructure delivery planning, in venues in Acton, Ealing, Greenford, Hanwell, Park Royal and Southall
- Two youth conferences organised in conjunction with the careers and education services hosted by a facilitator in venues in Ealing
- Other meetings with specific interest groups

## 2 Statistical Analysis of Responses

2.1 A total of 330 representations were received from 41 respondents. Appendix 3 lists the respondents, and Appendix 4 details representations received and officer responses. Representations were submitted by businesses, community/voluntary groups, political parties and statutory organisations. A breakdown of the number of respondents by type is shown in Figure 1. As can be seen, The single largest groups of respondents were statutory bodies, with a strong and equal representation of residents and business organisations.

Figure 1 Respondents by type

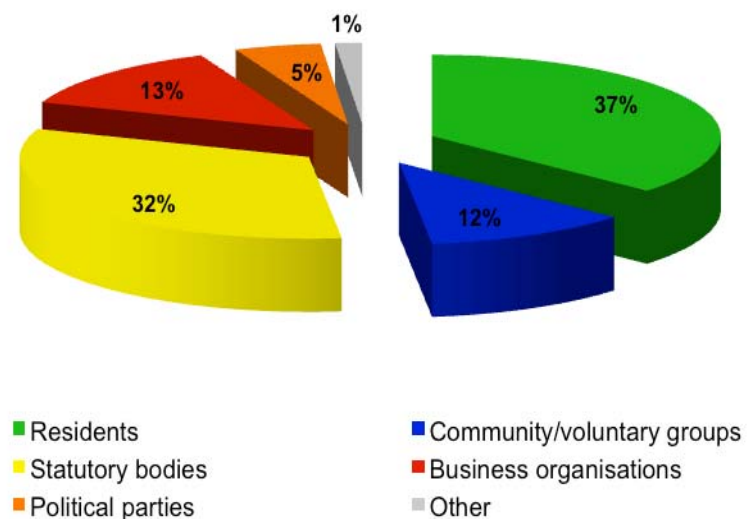
Respondent Type	Total Number
Residents	11
Community/voluntary groups	2
Statutory bodies	14
Business organisations	11
Political parties	2
Other	1
<b>Total</b>	<b>41</b>



2.2 Of the 330 separate representations received, over a third were from residents and an almost equal number came from statutory bodies.

Figure 2 Representations by respondent type

Respondent Type	Total Number of representations
Residents	121
Community/voluntary groups	38
Statutory bodies	107
Business organisations	43
Political parties	16
Other	5
<b>Total</b>	<b>330</b>



*Table 1 Representations received on individual policies by respondent type*

<b>Policy Ref</b>	<b>Residents</b>	<b>Community /voluntary groups</b>	<b>Statutory bodies</b>	<b>Business</b>	<b>Political parties</b>	<b>Other</b>	<b>Total</b>
2.13		1	1	2			4
2.15		1	1		1	1	4
2.17			1	1			2
2.18	11	2	2		1		16
3.1			2				2
3.12			1				1
3.13			2	2			4
3.14		1	1	1			3
3.15		1	1		1		3
3.17	11	1	2		1		15
3.18	11	1	2				14
3.19				1			1
3.2			3				3
3.20		1					1

<b>Policy Ref</b>	<b>Residents</b>	<b>Community /voluntary groups</b>	<b>Statutory bodies</b>	<b>Business</b>	<b>Political parties</b>	<b>Other</b>	<b>Total</b>
3.5	11	3	5	3			22
3.6			3	1			4
3.7		1	3	3			7
4.5		1					1
4.7						1	1
4.8	11	1					12
4.9	11	1					12
5.10	11	2	2	1			16
5.11			1	1			2
5.12			4	1			5
5.13			2				2
5.14			1	1			2
5.15			3				3
5.16			1				1

<b>Policy Ref</b>	<b>Residents</b>	<b>Community /voluntary groups</b>	<b>Statutory bodies</b>	<b>Business</b>	<b>Political parties</b>	<b>Other</b>	<b>Total</b>
5.17			3	1			4
5.18		1	2				3
5.2			3				3
5.3			2				2
5.9			2				2
6.10		1	1				2
6.13	11	2	1		1		15
6.14			1				1
6.15				2			2
6.2		1			1		2
6.3			2				2
6.5		1		1	1		3
6.6		1					1
6.7			1				1



<b>Policy Ref</b>	<b>Residents</b>	<b>Community /voluntary groups</b>	<b>Statutory bodies</b>	<b>Business</b>	<b>Political parties</b>	<b>Other</b>	<b>Total</b>
6.9		1		1			2
7.1			2				2
7.12		1	1	1			3
7.13			1				1
7.14		1					1
7.17			1				1
7.19			2				2
7.20			1				1
7.26			2				2
7.27			1				1
7.28			2				2
7.3	11	1	3				15
7.30			2				2
7.4				1	1		2

<b>Policy Ref</b>	<b>Residents</b>	<b>Community /voluntary groups</b>	<b>Statutory bodies</b>	<b>Business</b>	<b>Political parties</b>	<b>Other</b>	<b>Total</b>
7.6					1		1
7.7	11	1	1	1			14
7.9			1				1
3.17-3.19		1					1
4A	11	2	5	5	1		24
4B					1		1
5.11 + LV			1				1
5.21 + LV			1				1
5A			2	2		1	5
6.3 & 6.13			1				1
6.7, 6.8			1				1
7 D			1				1
7.7 + LV		1					1
7A		1	1	1	1		4

<b>Policy Ref</b>	<b>Residents</b>	<b>Community /voluntary groups</b>	<b>Statutory bodies</b>	<b>Business</b>	<b>Political parties</b>	<b>Other</b>	<b>Total</b>
7B		1	2	1			4
7C		1	1			1	3
7D				1			1
Appendix 1		1					1
General			2				2
LV 4.8					1		1
LV 4.9			1		1		2
LV 5.10				1		1	2
LV 5.2				2			2
LV 7.12			1				1
LV 7.17				1			1
LV 7.3			1	1			2
LV 7.7			2	2	2		6
LV 7.8			1				1

Policy Ref	Residents	Community /voluntary groups	Statutory bodies	Business	Political parties	Other	Total
New Policy			1				1
<b>Total</b>	<b>121</b>	<b>38</b>	<b>107</b>	<b>43</b>	<b>16</b>	<b>5</b>	<b>330</b>

Figure 3 Top ten policies by number of representations received

Policy	Total
4A	24
3.5	21
5.10	16
2.18	16
7.3	15
6.13	15
3.17	15
7.7	14
3.18	14
4.9	12

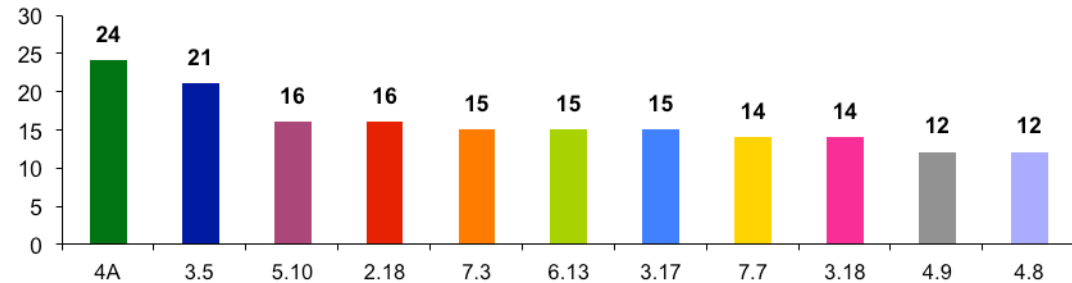
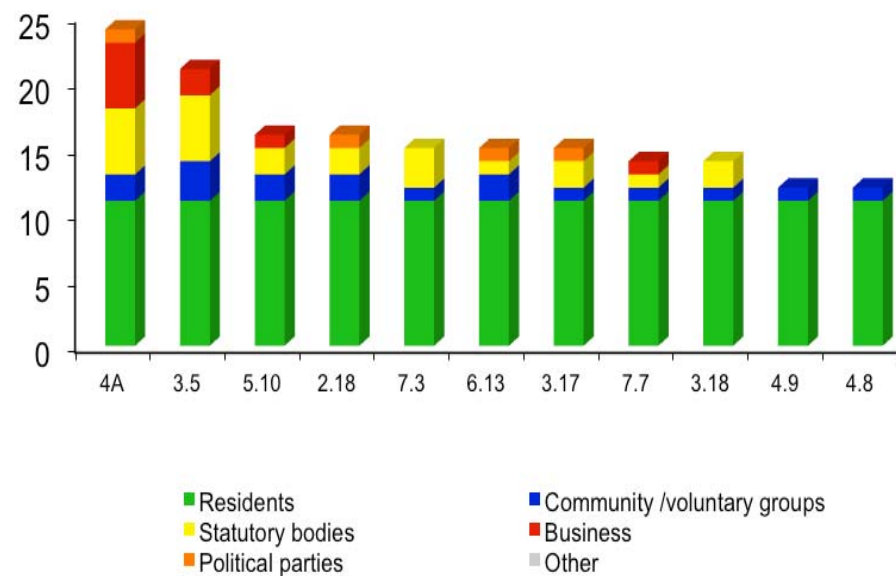


Figure 4 Top ten policies by type of representation

Site	Residents	Community /voluntary	Statutory bodies	Business	Political parties
4A	11	2	5	5	1
3.5	11	3	5	2	
5.10	11	2	2	1	
2.18	11	2	2		1
7.3	11	1	3		
6.13	11	2	1		1
3.17	11	1	2		1
7.7	11	1	1	1	
3.18	11	1	2		
4.9	11	1			
4.8	11	1			



### 3 Key Issues Arising from Consultation

- 3.1 The 330 representations received commented on a wide variety of issues relating to the individual sites, however three key themes were notable for the amount of interest that they generated. For ease of use, a summary of key issues is presented below to provide a broad overview of the nature and content of representations received. However, officers have taken into consideration every comment and these will be incorporated into the Final Proposals wherever necessary and appropriate.
- 3.2 The following paragraphs outline the policy issues where a significant number of representations were received, or where a representation resulted in the Council endorsing a significant change to the policy approach within the DM DPD.

#### Design of development

- 3.3 The single largest group of representations related to general policies designed to manage the delivery of quality development, or with individual aspects of design. The range of suggestions made was considerable and several proposals were notable for their level of detail and officers tried to provide an appropriately comprehensive response where this was the case. In addition to the overarching design policy 3.5, urban greening, and designing out crime attracted particular comment.

#### *Council Response*

- 3.4 Delivering the best possible output from each development scheme is the guiding ethos of the Development Management approach and distinguishes it from the minimisation of impact that was the main concern of development control.
- 3.5 At the policy formulation stage as well as in individual applications is a matter of detail, and the accepted representations will be tested rigorously against Ealing's extant development plan policies contained by the adopted Development Strategy and the London Plan 2011 and incorporated where appropriate. The Council will also scrutinise this framework carefully for opportunities to address specific local problems or to enhance the distinctive built and natural environment that gives Ealing its character.

#### A healthy mix of uses

- 3.6 Many representations, including single largest number of representations on any one policy, related to Ealing's approach to protecting individual use types and maintaining a healthy overall mix of uses within town centres and across the Borough as a whole. Comments overwhelmingly favoured the protection and enhancement of a range of mixed uses even where they differed as to the types or mix of uses that were necessary at any given location.
- 3.7 Residents, community groups and statutory bodies were particularly keen to ensure an protection of Ealing's industrial and employment land supply, where business organisations typically sought greater flexibility overall, but with the aim of delivering a mix of uses on given sites.

### *Council Response*

- 3.8 The Employment Land Review (2010) was published alongside the Initial Proposals, and its recommendation regarding the continued protection of employment land, specifically industrial land, will be reflected in the Final Proposals.
- 3.9 The Development Sites DPD in particular will guide the continued development of mixed uses within town centres, with the extra level of guidance that this document allows complementing generic development management policies.
- 3.10 A range of design policies support the mixing of uses and their location within walking distance of each other. This walkability and variety of built environment is essential to successful planning and policy will continue to support it strongly.

### **Community facilities and infrastructure**

- 3.11 A significant number of representations concerned the protection of existing community facilities and infrastructure, or the provision of new physical and social infrastructure, mainly by means of development contribution. A number of different systems or opportunities were suggested for the collection of additional contributions, and analysis was also submitted of the need for flexibility in the application of financial and in-kind planning obligations.

### *Council Response*

- 3.12 Protection of community facilities or infrastructure is generally clear-cut in local, regional and national policy; where there exists a defined or justifiable need for the facility in question then there are generally planning grounds for preventing change of use or applying a market test for alternative providers. The context of the protection of community facilities is also changing with the increase powers available outside of the planning system, such as the community right to buy.
- 3.13 Provision of new infrastructure is generally more complex requiring necessary contributions from development to be secured through a combination of CIL, S106 and case-by-case negotiation backed by policy. Further work is needed before final, detailed proposals can be produced, but the disposition of these requirements will be determined with reference to a range of evidence prior to the publication of the DM Final Proposals.

## 4 Next Steps

- 4.1 The Development Management Initial Proposals and all of the accepted representations will be updated against Ealing's approved development plan comprising the adopted Development Strategy and the London Plan 2011. This reassessment may require further research in addition to the existing evidence base, and will take into account the comments from consultation.
- 4.2 The next round of public and stakeholder engagement will take place in Spring 2012, seeking views on the Final Proposals version of the Development Management DPD. All representation received on the Final Proposals will be taken into consideration, prior to submission of the final document to the Secretary of State for independent examination in Winter 2012.



## **Appendices**

**Appendix 1 Bodies/Individuals Invited to Make Representations to the Development Management Initial Proposals (Regulation 25)**

**Appendix 2 Consultation Materials**

**Appendix 3 List of Respondents**

**Appendix 4 Representations Received and Officer Response**