

MATTER 1: OVERALL APPROACH

Representor: DM 20

James Guest, for Ealing Fields Residents' Association

Matter 1.2: Generally, do the two DPD's take forward the policies of the London Plan, reflecting local issues and objectives? How do they relate to those of neighbouring authorities within London?

Matter 1.4: Has the Plan emerged following consideration of all reasonable alternatives? . . .

Appropriateness of London Plan as Development Management DPD

1. As stated in our earlier consultation submissions we question the appropriateness of using the London Plan with minimal local additions as Ealing's Development Management DPD.
2. The London Plan is a strategic London-wide document which is not intended to provide the level of detailed guidance one expects to find in a Development Management DPD.
3. The decision to adopt the London Plan as Ealing's Development Management DPD appears to have been decided by the Council without reference to the community and does not appear to be supported by consultation responses from the community on the alternative formats for this DPD.
4. We have forwarded for inclusion in the Examination Library a copy of Richmond Council's post-examination Development Management DPD as an example of the level of detail which is appropriate to an Outer London Borough which is committed to the preservation and enhancement of its heritage and protecting the amenity of existing and future residents.
5. It is our understanding that provisions contained in a DPD document which has been subject to the examination process, such as Richmond Council's, carry far greater weight when it comes to making decisions on planning applications and at appeals, than does guidance which has not been subject to an examination.
6. For these reasons we believe that Ealing would have a far sounder Development Management DPD if it followed the model provided by Richmond and other councils.

Selective adoption of London Plan Policy Guidance

7. We question the soundness of Ealing Council's decision to selectively apply London Plan SPG's.
8. It is our understanding that London Plan SPG's have a London-wide application and are not discretionary in nature.
9. We are further surprised that Ealing Council has chosen not to conduct Borough-wide Character and Context Studies as advocated in the London Plan Shaping Neighbourhoods SPG.

10. As a matter of principle, it seems inappropriate for a Local Planning Authority which is seeking to rely on the London Plan as its Development Management Document, with minimal local enhancements, not to enthusiastically adopt and apply all the associated London Plan SPG's.
11. We have discussed the need for Borough-wide Character and Context Studies in more detail in our submission on Matter 5.

Supporting documents

Richmond Council's Development Management DPD

http://www.richmond.gov.uk/home/environment/planning/planningpolicy/local_development_framework/development_management_dmp.htm