

London Borough Ealing

Regulation 18 Local Plan

Site Selection Report

Reference: Final Issue

| 28 November 2022

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 287323-07

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1. Introduction

Ealing Council ('the Council') is in the process of preparing a new Local Plan which will set out how the borough will grow and evolve over the next 15 years. The Plan will comprise a vision, strategic objectives and planning policies that together provide the overarching framework for the delivery of sustainable development and will support the implementation of the London Plan (2021)¹ and its aspiration for achieving Good Growth. The new Local Plan aims to allocate sufficient land in appropriate locations to ensure that the Council meets its housing and employment needs over the plan period. The Council's site allocations policies will promote a comprehensive approach to future development, ensuring proposals make effective use of land, are high quality with a suitable use or mix of uses and are co-ordinated with appropriate infrastructure requirements.

The overall aim of this Site Selection Report ('the Report') is to assist the Council in making decisions on the most appropriate sites to allocate for housing and employment development. The Report is an independent evidence base to the Local Plan and does not *allocate* sites for development. However, it is intended as one of the ways to help *identify* the most suitable sites with development potential within the borough. Ealing Council will use this evidence to inform decisions around which sites to include as potential site allocations, including the type and quantity of development. The Council will also identify and assess potential sites for traveller accommodation and a separate site selection report explaining this process will be published for consultation in 2023.

The following sections outline the borough's housing and employment requirements over the new plan period.

Housing

The London Plan states that there is a need to increase housing supply, which should be supported within development plans through the allocation of an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification, encouraging development on appropriate windfall sites, and through optimising capacity (Policy H1). The housing supply targets set out in Policy H1 (Table 4.1) require Ealing Local Planning Authority to deliver **21,570 homes over the ten year period from 2019/20-2028/29**. Additionally, London Plan Policy H2 (Table 4.2) sets out minimum targets for small sites, with the target for Ealing Local Planning Authority of **4,240 homes over the ten year period from 2019/20-2028/29**.

A Site Selection Methodology ('SSM') has been developed and undertaken to support the allocation process, which in turn will make an important contribution to meeting the outlined housing target. It is recognised that there is additional supporting evidence that the Council will draw upon to demonstrate their ability to meet this housing target. The Council has prepared a Housing Topic Supply Paper to support the Regulation 18 Local Plan which outlines the approach to establishing a supply position and captures current assumptions and requirements for further work.

¹ Available at: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

Employment

With regards to employment, Policy GG5 of the London Plan states the aim of conserving and enhancing London's global economic competitiveness and ensuring that economic success is shared amongst all Londoners. Therefore, sufficient employment and industrial space in the right locations to support economic development and regeneration must be planned for. The London Plan does not include industrial or office need figures for boroughs.

Policy E5 of the London Plan states that Strategic Industrial Land (SIL) should be managed proactively through a plan-led process to sustain areas of SIL as London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy.

Policy E7 of the London Plan encourages boroughs to explore the potential to intensify industrial activities on industrial land to deliver additional capacity and to consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential and other uses. The Policy continues to state that there may be scope for selected parts of SILs or Locally Strategic Industrial Sites (LSISs) to be consolidated or appropriately substituted. This should be done through a carefully co-ordinated plan-led approach to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the release of some land for a mix of uses including residential.

The West London Employment Land Evidence Report (2019)² categorises Ealing as a 'provide capacity' borough, alongside Brent, as it is a borough where strategic demand for industrial, logistics and related uses is anticipated to be the strongest. It states that Ealing should seek to deliver intensified floorspace capacity in either existing and/or new locations, accessible to the strategic road network, and in locations with potential for transport of goods by rail / water.

The West London Employment Land Evidence Report (2019) concluded that there is a **net deficit of industrial provision of 1ha**. In 2021/22 the West London Employment Land Review³ was undertaken and concluded that for Ealing there is clear evidence that for the foreseeable future the levels of strong demand will continue as the borough remains a desirable occupier location with good access, an industrial land pool and access to target populations. It states that employment growth in this sector in recent years has been strong and the leasing and gross value added (GVA) growth outlook is very strong for wholesaling and warehousing, casting doubt on any slowdown in location based activity and employment. Furthermore, demand is acute and the protection of space and provision of new premises is essential, whilst the upgrading of older stock is desirable. Overall it was concluded that it is critical that in Ealing as much functional industrial floorspace as possible is retained and upgraded; and there is a need to deliver additional floorspace where feasible in line with the conclusions of the 2019 study.

This evidence underpins the Regulation 18 Local Plan, which, in line with the London Plan, includes draft policies and potential site allocations designed to protect and increase the supply of industrial land. Notwithstanding this, a comprehensive review of Ealing's industrial land has highlighted that some sections of SIL do not perform in their current designation and that designation as LSIS will help to drive industrial redevelopment, supported by mixed enabling development if necessary. Parts of SIL which the Council have identified as not performing in their current designation have been included as

² Available at: https://www.ealing.gov.uk/downloads/download/6596/wl_employment_land_evidence_report

³ Available at: [West London Employment Land Review | Ealing Council](#)

preferred sites in the SSM, for their assessment as potential sites for industrial-led mixed use development.

The Local Plan has been developed on the basis that Ealing's town centres represent a complimentary economic function to its strong industrial base with a distinct offer of knowledge intensive industries particularly in Ealing, Acton and Hanwell. Other centres in the borough have a physically close relationship with SIL and LSIS sites and these form a springboard for the growth of existing town centres in Southall, Greenford, Northolt and Perivale. Draft town spatial policies and potential site allocations within the Regulation 18 Local Plan have been designed to identify the most appropriate locations for the delivery of strategic office growth.

Site selection assessment for Regulation 18 consultation

This Report has been prepared to support the Regulation 18 Local Plan and includes a detailed SSM outlining the stages of the process undertaken to date to help identify potential site allocations. The Council is currently only part-way through the SSM and therefore this Report represents a snapshot in time. The key purpose of the SSM for the Regulation 18 consultation has been to build an understanding of the characteristics and constraints for each of the potential site allocations based on best available information and knowledge at time of writing.

The SSM explains how the process will be further refined in the next stage of the Plan making process to form the basis of decision making on sites for allocation in the Proposed Submission Local Plan (Regulation 19). As such, information in this Report will change over time as the SSM is further developed and more detailed information on sites becomes available through the Regulation 18 consultation feedback received from the local community, residents, businesses, developers and statutory consultees and further engagement with the developer community. This will be an iterative process to bolster the Council's understanding of potential site allocations, particularly around deliverability and capacity.

Within the Proposed Submission Local Plan (Regulation 19), policies will outline what kind of development is to be expected and encouraged on each allocated site. A site allocation will be expected to include details of proposed uses, capacity, design considerations, key constraints, and indicative timelines for development. Through the allocation of individual sites, development is actively encouraged and a realistic pipeline for employment and residential development can be formed.

The SSM is an important part of the evidence base supporting potential site allocations, which must be founded on a robust approach, undertaken in a transparent manner and fully documented at key stages. This SSM takes into account relevant national and regional policy, through the National Planning Policy Framework⁴ (NPPF 2021), Planning Practice Guidance⁵ (PPG) and London Plan (2021). The NPPF states the need for the "preparation and review of all policies...[to be]... underpinned by relevant and up-to-date evidence ... [which should be] adequate and proportionate" (Paragraph 31). Therefore, the SSM includes a review of relevant policy at both national and regional levels. Local development plans, and their evidence must also be transparent and robust, and therefore

⁴ Available at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

⁵ Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

decisions and professional judgements by both assessors and local officers have been clearly justified.

The SSM for Regulation 18 consultation has been split into the following stages, to highlight the clear and transparent approach to identifying and assessing sites, before taking them forward for consultation as potential site allocations:

Stage 1 - Identifying sites for assessment

Stage 2 – Suitability assessments

Stage 3 – Deliverability assessments

Stage 4 – Identifying potential sites for allocation

Stage 5 – Inputting to housing evidence

The Regulation 18 consultation provides an important opportunity for the Council to gather critical information from land owners, developers and site promoters to support the suitability, capacity and deliverability assessments of potential site allocations. The knowledge that will be gained from this exercise will contribute to a more comprehensive site assessment process (particularly with regards to deliverability and capacity) which will assist in defining a revised set of allocations, which will form a significant element of the Council's 5 Year Housing Land Supply and development trajectory.

Alongside the ongoing site selection assessment work, the Council will be reviewing a suite of existing and further evidence base documents to consider which sites should proceed as potential allocations in the Proposed Submission Local Plan (Regulation 19). Such evidence includes the Preferred Spatial Option Report (Arup), the Integrated Impact Assessment (Arup), Green Belt and Metropolitan Open Land Review, Infrastructure Topic Paper (Arup), Ealing Character Study (Allies and Morrison)⁶, Housing Design Guide (Allies and Morrison)⁷, as well as a Tall Buildings Strategy and West London Strategic Flood Risk Assessment⁸.

⁶ Available at: [Ealing character studies | Ealing Council](#)

⁷ Available at: [Housing Design Guidance | Ealing Council](#)

⁸ Available at: [West London Strategic Flood Risk Assessment - West London SFRA](#)

2. Structure

The Site Selection Report is structured as follows:

- Section 3: provides an overview of the SSM used to identify potential site allocations to be included in the Regulation 18 Local Plan;
- Section 4: outlines the site selection assessment undertaken to date;
- Section 5: summarises the anticipated next steps of the SSM in later stages of the Plan making process;
- Appendix A: covers the planning policy and guidance underpinning the SSM;
- Appendix B: outlines the range of evidential sources informing the site selection process;
- Appendix C: sets out the detailed methodology for the suitability and deliverability assessments;
- Appendix D: is a summary matrix of the suitability and deliverability assessment criteria;
- Appendix E: provides the site-level results of the site selection assessment for Regulation 18 consultation including the suitability and deliverability assessments undertaken to date.

3. Site Selection Methodology

3.1 Stages of the Methodology for Assessing Residential and Employment (including Mixed Use) Sites

A concise summary of the methodology is provided below in Figure 1 and Table 1. Both Figure 1 and Table 1 indicate those activities that have been undertaken to date, and those that are anticipated to support the Proposed Submission Local Plan (Regulation 19), following Regulation 18 consultation. A detailed methodology is provided for the suitability and deliverability assessments in Section 3 and Appendix C.

Table 2 sets out the methodology followed for the capacity exercise. A design-led approach was utilised to calculate indicative capacities for each site, in accordance with London Plan (2021) policy. For Regulation 18 consultation, this has been provided to the Council as an aggregate indicative number of homes with a high level indication of what could be delivered in the first five years and beyond the first five years.

Figure 1: Site selection methodology overview for Regulation 18 consultation and Regulation 19 consultation

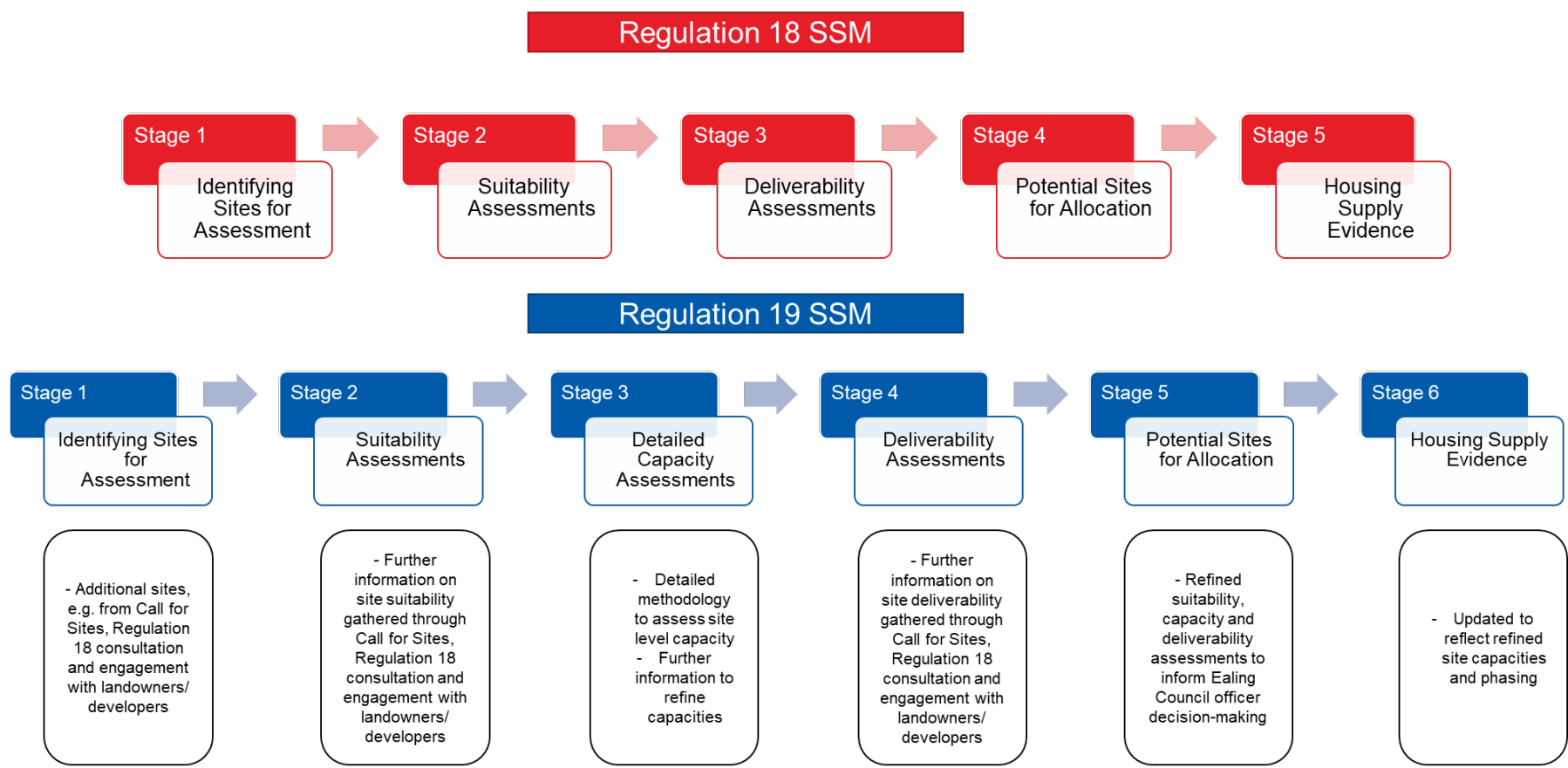


Table 1: Stages of methodology for residential and employment sites

Stage of Methodology	Approach	Output for Regulation 18 stage
Stage 1: Identifying Sites for Assessment	Ealing Council has identified a pool of potential sites through a range of data sources including the London Strategic Housing Land Availability Assessment (SHLAA), Ealing Council's Brownfield Register, Ealing-Council owned sites, Ealing Council-identified sites, existing site allocations, pre-application discussions, early work on the Green Belt/ Metropolitan Land Review, engagement with Transport for London, Early Call for Sites submissions, as well as Central Ealing and West Ealing Neighbourhood Plans	<ul style="list-style-type: none"> • Not applicable
	<p>The first stage was to determine which sites from the pool of potential sites should be taken forward as 'preferred sites' for suitability and deliverability assessment. Ultimately, the decision-making around whether a site should be taken forward as a preferred site drew on a range of considerations and Ealing Council officer knowledge. In assessing whether a site became a preferred site, Ealing Council officers applied their judgement to review the following factors:</p> <ul style="list-style-type: none"> • Site size: where sites fell under a 0.25ha threshold, they were not taken forward as preferred sites unless considered to have strategic importance. Given the requirements of the London Plan (2021) to identify and allocate appropriate small sites for residential development and the need to meet a significant housing target, it was considered necessary to apply the suggested threshold of 0.25ha as set out in the PPG⁹ more flexibly at Stage 1, where appropriate. • Site availability during the plan period: where there was evidence suggesting that the site was not available during the plan period, the site was not included as a preferred site. • Commenced or completed development: where development was known to have commenced or been completed on a site or part of a site, site boundaries were 	<ul style="list-style-type: none"> • Spreadsheet and GIS file of preferred sites with known site details. This was to allow for a consistent approach in assessing the sites against suitability/ deliverability criteria.

⁹ The PPG on Housing and Economic Land Availability Assessment (Reference ID: 3-005-20190722)

	<p>reviewed and, in some instances, amended to exclude this development and/or the site was not brought forward as a preferred site.</p> <p>This process was repeated consistently whenever new sites were brought to the attention of the Council, for example through Early Call for Sites. Ealing Council officers reviewed information held for all preferred sites to ensure, at a minimum, the site name, site address, site area (ha), initial net and gross capacity (if available), source, and proposed use (if available) was known for every preferred site. Where known, site ownership, existing designations and existing site allocations were also recorded.</p> <p>Where new sites arose through Early Call for Sites or other site promotion activities, Council officers also reviewed:</p> <ul style="list-style-type: none"> • Site boundaries/proposed uses: when sites were considered for inclusion as a preferred site, they were checked for duplicates or overlaps with other known preferred sites: <ul style="list-style-type: none"> a. Where a new site exactly duplicated an existing preferred site (in terms of both site boundary and uses), the old preferred site reference and GIS boundary was superseded with the latest information. This latest reference and boundary were then used in the latter stages of site assessment; b. Where the new site was intended to be an update on an existing preferred site from the same landowner/promoter (i.e. submitting amended site boundaries), the existing preferred site reference/boundary was superseded and the latest information used in the site assessment; c. Where the new site overlapped with an existing preferred site (in terms of site boundary) but the landowner/promoter, site areas or proposed uses were different (e.g. where the Council wanted to investigate a wider site area but a promoter has submitted a smaller site area), the existing preferred site was retained and both the existing and new sites were carried forward separately for assessment. <p>A review of preferred sites with Council teams prior to site assessment, including Ealing Council's Regeneration, Development Management, Parks and Leisure, Housing, Property Assets, Education and Health teams – was undertaken to identify any new sites, potential amendments to boundaries and contextual information on sites prior to</p>	<ul style="list-style-type: none"> • Updated preferred sites
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	commencing Stage 2. Feedback was reviewed by the Ealing Council Local Plan team and updates made where required.	
	<p>Call for Sites: the PPG¹⁰ recommends the issuing of a Call for Sites as part of HELAA assessments – and it is also considered to be an important part of the SSM to ensure the site selection process fully explores development opportunities across the borough. The Council issued an Early Call for Sites during the preparation of the Local Plan in March 2022. Submissions from landowners and other site promoters were considered for their inclusion as preferred sites (taking into account site size; duplicate/overlapping sites; availability during Plan period; commenced/completed development, as noted above).</p>	<ul style="list-style-type: none"> • Updated preferred sites
	<p><u>Anticipated activities following Regulation 18 consultation</u></p> <ul style="list-style-type: none"> • Regulation 18 consultation feedback: Ealing Council will consult on the Draft Local Plan between November 2022 and January 2023. As part of this process, a 'Call for Sites' exercise will be undertaken. Additional sites may therefore be included for assessment through the SSM, subject to review by the Ealing Council Local Plan team. 	<ul style="list-style-type: none"> • Not applicable
Stage 2 – Suitability Assessments	<ul style="list-style-type: none"> • At this stage, all preferred sites were assessed for their suitability. A site is considered suitable if it would provide an appropriate location for development when considered against relevant constraints and the potential for constraints to be mitigated (PPG Paragraph: 018 Reference ID: 3-018-20190722). To determine site suitability, therefore, a series of assessment criteria that accounted for varying constraints was devised. • The assessment criteria were informed by constraints identified in PPG¹¹, the adopted development plan (Ealing Local Plan – Adopted Policies Map 2013) and other data sources validated by Ealing Council. These were considered to be the most up-to-date 	<ul style="list-style-type: none"> • A comprehensive site suitability assessment proforma. Suitability summaries are provided setting out how future development may be impacted by identified

¹⁰ The PPG on Housing and Economic Land Availability Assessment (Reference ID: 3-005-20190722)

¹¹ The PPG on Housing and Economic Land Availability Assessment (Reference ID: 3-005-20190722)

	<p>and relevant set of constraints for the purposes of assessing site suitability, in line with the NPPF¹² requirement for this to be the starting point for decision making.</p> <ul style="list-style-type: none"> • Taking into account potential policy changes, in this case those arising from the Regulation 18 Local Plan, certain criteria were included to ensure the sites were assessed in line with the Council's emerging spatial strategy and policy direction – e.g. the Local Plan spatial development pattern criterion. • Each of the criteria were agreed to be relevant, proportionate and necessary in order to assess site suitability for development. At this stage, each criteria used to assess the suitability of sites was afforded equal importance. In making the ultimate decision around allocations for the Proposed Submission Local Plan (Regulation 19), Council officers will use their professional knowledge and judgement to consider site suitability in the round. • The preferred sites were subject to detailed quantitative (e.g. using datasets / GIS shapefiles etc.) and/or qualitative (e.g. using professional judgement) assessment to identify their site characteristics and constraints for residential and employment (including mixed use) development. • The criteria assessments are presented through standardised scoring (green/amber/red). All preferred sites were assessed through the same process and no sites were filtered out at this stage, including those awarded a high number of 'red' scores. • The detailed suitability assessment methodology and the scoring matrix can be found in Appendix C and Appendix D. The criteria were considered to be relevant for all proposed land uses (residential/ employment/ mixed use). 	<p>constraints and mitigation that may be required.</p>
	<p><u>Anticipated activities following Regulation 18 consultation</u></p> <ul style="list-style-type: none"> • Site suitability assessments will be updated upon review of additional information received through the Regulation 18 consultation and further engagement with the developer community. 	<ul style="list-style-type: none"> • Not applicable

¹² Paragraph 12 of the National Planning Policy Framework (2021). Available at: [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/92512/nppf-2021.pdf)

	<ul style="list-style-type: none"> Further criteria assessments will be undertaken against latest evidence base studies and site information. 	
Stage 3 – Deliverability Assessments	<ul style="list-style-type: none"> All preferred sites were then assessed for their deliverability as sites to accommodate residential/ employment/mixed use development. This includes their availability and achievability. Due to the limited information held at this stage, it was not possible to complete a full deliverability assessment; instead, a partial high-level assessment was undertaken against a select list of criteria. The full assessment will be completed following Regulation 18 consultation. The PPG¹³ sets out that sites can be considered available where there is confidence that there are no legal or ownership impediments to development. The PPG¹⁴ sets out that sites can be considered achievable where there is a reasonable prospect that the particular type of development will be developed on that site at a particular point in time – a judgement of the economic viability of a site. As with the suitability assessments, the criteria used to assess the deliverability of sites were not ranked in importance. In making the ultimate decision around allocations for the Proposed Submission Local Plan (Regulation 19) the deliverability of sites will be considered on balance, using professional knowledge and judgement. Each of the criteria have been agreed to be relevant, proportionate and necessary in order to assess whether sites are deliverable, and the assessments include both quantitative (e.g. using datasets / GIS shapefiles etc.) and qualitative (e.g. using professional judgement) analysis. These criteria assessments are presented through standardised scoring (green/amber/red). However, no sites are filtered out at this stage, including those awarded a high number of ‘red’ rankings. 	<ul style="list-style-type: none"> A partial deliverability assessment proforma, based on information held to date. As a full criteria assessment has not been completed at this Regulation 18 stage, deliverability summaries have not been provided.

¹³ The PPG on Housing and Economic Land Availability Assessment (Reference ID: 3-005-20190722)

¹⁴ The PPG on Housing and Economic Land Availability Assessment (Reference ID: 3-005-20190722)

	<ul style="list-style-type: none"> The detailed deliverability assessment methodology and the scoring matrix can be found in Appendix C and Appendix D. The criteria were considered to be relevant for all proposed land uses (residential/ employment, including mixed use). 	
	<p><u>Anticipated activities following Regulation 18 consultation</u></p> <ul style="list-style-type: none"> Site deliverability assessments will be updated upon review of additional information received through the Regulation 18 consultation and further engagement with the developer community. Further criteria assessments will be undertaken against latest evidence base studies and site information. 	<ul style="list-style-type: none"> Not applicable
Stage 4 – Identifying Potential Sites for Allocation (Development Sites)	<ul style="list-style-type: none"> This stage involved a review of the preferred sites to identify which should progress through to the Regulation 18 Consultation as potential site allocations (‘Development Sites’). Consideration was given to whether any logical adjustments should be made to site boundaries to create combined sites and/or amend overlapping sites. Sites have not been discounted at the Regulation 18 consultation stage as a result of the suitability or deliverability assessments. 	<ul style="list-style-type: none"> Portfolio of Development Sites for Regulation 18 consultation– residential and employment (including mixed use).
	<p><u>Anticipated activities following Regulation 18 consultation</u></p> <ul style="list-style-type: none"> Once further information is available to fully assess suitability and deliverability, the results of these assessments will be used to help Ealing Council officers identify the most suitable sites with development potential within the borough, which can be used to inform decisions around which sites to include as site allocations within the Proposed Submission Local Plan (Regulation 19) 	<ul style="list-style-type: none"> Not applicable
Stage 5 – Inputting to Housing Evidence	<ul style="list-style-type: none"> An indicative assessment of housing capacity and broad phasing has been undertaken for the list of Development Sites and is explained in detail in Section 3.2 below. The high-level capacity exercise at this stage is to inform the Council’s Housing Supply 	<ul style="list-style-type: none"> Aggregate indicative number of homes and

	<p>Topic Paper and ongoing preparation of the 5 Year Housing Land Supply (5YHLS) and housing trajectory.</p> <ul style="list-style-type: none"> • The Regulation 18 consultation provides an important opportunity to gather information to support the suitability, capacity and deliverability assessments of potential sites allocations from landowners, developers and site promoters, as well as to verify the deliverability of sites with existing permissions. The knowledge gained from this exercise will provide a valuable input to the completion of the 5YHLS and trajectory. 	phasing at the borough level.
	<p><u>Anticipated activities following Regulation 18 consultation</u></p> <ul style="list-style-type: none"> • The PPG¹⁵ requires that once sites and broad locations have been assessed, development should be assembled into an indicative trajectory, which sets out the amount of housing and economic development that can be provided and its phasing over the plan period. • Further detailed capacity work is proposed and is explained in detail in Section 3.2 below. 	<ul style="list-style-type: none"> • Not applicable

¹⁵ The PPG on Housing and Economic Land Availability Assessment (Reference ID: 3-005-20190722)

3.2 Approach to Calculating Indicative Capacity for Regulation 18

Following the assessment of suitability and deliverability, a high-level capacity assessment exercise was undertaken to inform the Council's Housing Supply Topic Paper and ongoing preparation of the 5 Year Housing Land Supply (5YHLS) and housing trajectory.

The London Plan (2021) supports a design-led approach to capacity and therefore the Ealing Characterisation Study (Allies and Morrison 2022) formed the foundation of this assessment, feeding into a bespoke Excel-based capacity assessment tool developed by Arup for Ealing Council. Indicative baseline capacity has been calculated for each of the Development Sites, based on the following stepped approach:

Table 2: Stages of methodology for calculating indicative site capacity

Step	Approach
Step 1	<ul style="list-style-type: none">• Capacity tool development. Arup developed an Excel-based capacity assessment tool that applies a series of standard assumptions to each site to provide indicative residential units and non-residential floorspace. The focus of the capacity work at this stage was to establish indicative <u>residential capacity</u> to inform the Council's Housing Supply Topic Paper; therefore the non-residential element will be further considered at the next phase.
Step 2	<ul style="list-style-type: none">• Review of planning application information against preferred site boundaries and update to site list. Ealing Council officers provided a download of site planning history. Planning history that accounted for less than 25% of the site's total area was discounted. Where there were full or partial overlaps and the planning records are recent, these capacity figures and use mix were extracted. In some instances, the planning review identified that portions of sites had been or were in the process of being built out. In response, boundary amendments were made, or preferred sites were removed. In other cases, where extant planning permission capacity was not deemed to accurately reflect the site's potential based on up-to-date circumstances, other sources were checked (see Steps 3 and 4). Where these steps provided no appropriate capacity information, sites were instead taken through the Arup capacity assessment tool.
Step 3	<ul style="list-style-type: none">• Review of existing site capacity work commissioned by Ealing Council. Where preferred sites had been subject to more detailed site capacity work, and the capacity figures were deemed to be appropriate, it was agreed with Ealing Council officers that these sites should not also be assessed through the Arup capacity assessment tool. Such site capacity work includes site-specific feasibility studies and the Ealing Tall Buildings Guidance. Where this capacity information exists, it was incorporated into the capacity calculations.

Step 4	<ul style="list-style-type: none"> • Review of Early Call for Sites submission documents. For those sites put forward through Early Call for Sites, supporting documentation was reviewed to identify capacity information. Where information existed and was deemed appropriate for the site's context, these figures were utilised in place of assessing the site through the Arup capacity assessment tool.
Step 5	<ul style="list-style-type: none"> • Determine full list of sites to be assessed through the Arup capacity assessment tool. Having completed Steps 2-4 to identify sites with no or only partial relevant planning history, to remove sites under construction, and to ascertain which sites would have capacity figures available from other studies or through Call for Sites submission documents, a final list of sites for assessment via the Arup capacity tool was determined.
Step 6	<ul style="list-style-type: none"> • Gathering necessary information on sites to assess them through the Arup capacity assessment tool. Two workshops were undertaken with Ealing Council officers to provide the following information necessary to calculate indicative capacity: <ul style="list-style-type: none"> ▪ The type of development (full redevelopment, partial redevelopment or infill) – with partial and infill redevelopment resulting in a reduction to overall site area to be taken through the assessment; ▪ Use typology; ▪ Given the indicative nature of the capacity assessment at this stage, the outputs of the suitability assessment in relation to constraints were not used to determine the site's net developable area. Instead, an average site reduction of 20% to building footprint was applied (see Step 7), reflecting a reasonable design assumption around the amount of open space, internal movement within the site, building setbacks and parking, for example. Only in cases where particular constraining factors were known to Ealing Council officers were reductions applied to overall site area to be taken through the assessment at Step 7. ▪ An indicative timeline for delivery was assigned– either within the first five years of the Local Plan or beyond (all sites without planning history were automatically deemed to be beyond the first five years). In some instances, a proportional split was applied to the units expected to be delivered within the first five years and beyond (e.g. 25% in the first five years, 75% beyond).
Step 7	<ul style="list-style-type: none"> • Assessing sites through the Arup capacity assessment tool. <ul style="list-style-type: none"> ▪ To assess each site through the capacity tool, the starting point was to calculate its size using GIS analysis. As explained in Step 6, a standard assumption was applied to each site to ascertain the net developable area which also equated to the indicative building footprint (80% of total site size). It is noted that not all of the net developable area would necessarily accommodate building footprint due to the need to account for varying

	<p>levels of parking and open space, for example. However, no further reduction to site area was made for this high level calculation.</p> <ul style="list-style-type: none"> ▪ To reflect London Plan Policy D3 approach for character-led growth (i.e. growth sensitive to local context), the assessment tool then drew on data collected as part of the Ealing Characterisation Study (Allies and Morrison, 2022). Prevailing storey heights calculated in the Characterisation Study were multiplied by the building footprint to provide total Gross External Area (GEA) (m²). This element of baseline character subsequently fed through the rest of the assessment, with Gross Internal Area (GIA) calculated as a proportion (90%) of GEA, and units derived from dividing the GIA by Nationally Described Space Standards (NDSS). ▪ Given the high-level nature of the capacity assessment at this stage, unit figures were calculated using an average of the NDSS for flats (one-, two- and three-bed) and an average of the NDSS for houses (three- and four-bed). The ratio applied between flats versus houses is 9:1. ▪ Phasing (years 1-5 or 5+) was assigned to each site based on agreement with Ealing Council officers at Stage 6.
OUTPUT	<ul style="list-style-type: none"> • Aggregate indicative number of homes and broad phasing (within the first 5 years or beyond) at the borough levels. Net figures were established where information was known on existing uses.
	<p><u>Anticipated activities following Regulation 18 consultation</u></p> <ul style="list-style-type: none"> • In preparation for Regulation 19 consultation, a more detailed capacity methodology will be required to provide an assessment of the net residential and non-residential employment capacity at the site level. These capacities will be calculated prior to undertaking the deliverability assessment (i.e. as an integral part of the SSM, rather than as a distinct task towards the end of the process) in order to inform site allocation decisions. The Council will review the approach to calculating individual capacity on potential site allocations for the Proposed Submission Local Plan (Regulation 19) and will consider more detailed feasibility work on strategic sites. • A full assessment of existing units / floorspace of non-residential uses will be used to calculate gross to net figures. To do this, additional data sources – such as planning applications and Ealing Council address point data – will be reviewed. • The capacity assessment method explained above provides indicative capacity figures informed by current local character and prevailing heights. Later iterations of the capacity assessment tool will consider the effect of other factors on potential capacity – most notably the proposed approach to density and optimisation of sites in the Preferred Spatial Option, which is being consulted on as part of the Regulation 18 Local Plan. Resulting reductions or

uplifts to site capacity will be applied prior to the Proposed Submission Local Plan (Regulation 19), reflecting Ealing Council's strategy for distributing growth across the borough.

- Any additional information provided as part of the landowner / development surveys, planning applications, and pre-application enquiries, and feedback from the Regulation 18 consultation will need to be reviewed and may alter the assessment assumptions, as well as future proposed uses and capacity.

4. Summary of the Site Selection Assessment

4.1 Stage 1: Identifying Sites for Assessment

Through Stage 1 of the SSM, a total of 123 sites were identified as preferred sites. A map of all preferred sites is provided at Appendix E.1 and Table 3 shows the number of sites to be taken through the site selection process by Town.

These sites were drawn from a range of sources including:

- London Strategic Housing Land Availability Assessment (2017)
- Ealing Council's Brownfield Land Register
- Ealing Council-owned sites
- Ealing Council-identified sites
- Existing site allocations
- Pre-application discussions
- Early work on Green Belt/ Metropolitan Open Land Review
- Engagement with TfL
- Early Call for Sites submissions
- Central Ealing Neighbourhood Plan

Table 3: Summary of preferred sites to be taken through the site selection process

Ealing Town Area	Number of Sites
Acton	13
Ealing	35
Greenford	9
Hanwell	16
Northolt	16
Perivale	4
Southall	27
Ealing/ Hanwell	2
Greenford/ Southall	1
Total	123

4.2 Stage 2: Suitability Assessment

Once the initial preferred sites had been identified, each site was assessed against a series of standard suitability criteria, with full details for each criteria assessment provided in Appendix C.

The suitability assessment is based on information which was available prior to Regulation 18 consultation and will therefore be subject to further update as more information becomes available. The methodology includes commentary on the specific information that was available for each of the criteria assessments prior to Regulation 18, and what information is expected to be available after this.

Appendix E.3 contains a proforma for each of the 123 sites including:

- Site information and site plan;
- Scoring and justification against all suitability assessment criteria included at Regulation 18 stage; and
- A summary of the suitability assessment setting out how future development may be impacted by identified constraints and potential mitigation required.

4.3 Stage 3: Deliverability Assessment

Each site was assessed against a series of standard deliverability criteria, with full details for each criteria assessment provided in Appendix C.

It should be noted that due to the limited information available for this assessment, only a partial deliverability assessment has been undertaken at this stage. The scoring and justification for the deliverability assessment criteria included at Regulation 18 stage are provided within the site proforma in Appendix E.3.

4.4 Stage 4: Identifying Potential Sites for Allocation

The 123 preferred sites were reviewed by Ealing Council officers to determine whether they should progress through to the Regulation 18 consultation as potential site allocations (Development Sites). No sites have been discounted at the Regulation 18 consultation stage as a result of the suitability or deliverability assessments undertaken to date. However, three sites were discounted because they were superseded by overlapping sites and three sites were amalgamated into a new site. In addition, Officers reviewed site boundaries, which led to amendments for six Development Sites. This exercise left the **118 potential sites for allocation (Development Sites)** which are being consulted on in the Regulation 18 plan. A summary of these changes is provided in Table 4 below:

Table 4: Sites amended/superseded at Stage 4 of the SSM

Site Selection Reference	Status of Site for Regulation 18 consultation
EA04a	Not included as Development Sites. A new site (EA04) was drawn based on an amalgamation of EA04a (part of site), EA04b (whole site) and EA04c (whole site)
EA04b	
EA04c	
EA05a	Not included as a Development Site. Development Site boundary amended and site reference is EA05.
EA06a	Not included as a Development Site. Development Site boundary amended and site reference is EA06.
EA12a	Not included as a Development Site. Development Site boundary amended and site reference is EA12.
EA22a	Not included as a Development Site. EA22a has been superseded by Ealing EA22.
EA31a	Not included as a Development Site. Development Site boundary amended and site reference is EA31.
GR01a	Not included as a Development Site. Development Site boundary amended and site reference is GR01.
HA01a	Not included as a Development Site. Development Site boundary amended and site reference is HA01.
NO01a	Not included as a Development Site. Overlaps partially with NO01 which has been included.
SO10a	Not included as a Development Site. SO10a has been superseded by SO10.

4.5 Stage 5: Inputting to Housing Evidence

The indicative capacity figures and broad phasing assumptions were established for all 118 potential Development Sites which contained proposals for residential uses. This information will feed into the process of establishing the overall housing supply position. The outcomes of the indicative capacity and phasing exercise for Regulation 18 is outlined in Sections 4.5.1 and 4.5.2 below.

4.5.1 Capacity Assessments

Each of the 118 Development Sites was assessed for its indicative capacity using the methodology set out in Table 2. Residential units (comprising a mix of flats and houses) and non-residential floorspace were determined based on one of the following:

- Site planning history
- Arup capacity assessment tool

- Other evidence base documents – namely, site-specific feasibility studies and the Ealing Tall Buildings Guidance.

At the Regulation 18 stage, only housing capacity has been provided in order to inform the borough-wide housing trajectory. Capacity has been provided in net where possible, but gross figures have been assigned to the remaining sites due to the complexities in ascertaining existing units on all sites.

Following Regulation 18 consultation and in preparation for the Proposed Submission Local Plan (Regulation 19) additional capacity work will be undertaken to ascertain updated net figures for residential units and refining the split of uses for the non-residential floorspace. This work will be crucial to informing the Council's Development Trajectory. To inform the Proposed Submission Local Plan (Regulation 19), additional site-specific work will be undertaken to review existing development and assess potential for site optimisation.

4.5.2 Indicative Timing for Delivery

An indication of expected delivery phasing was provided for each of the 118 Development Sites, with sites apportioned into 'first five years of the plan', 'beyond first five years of the plan' or assigned a proportional split across the two categories. In advance of the Regulation 18 plan, engagement has not yet been undertaken with landowners/developers to ascertain, among other information, expected phasing. In the absence of this engagement, phasing decisions were made based on either:

- Ealing Council officer knowledge of the site/development plans; or
- Information provided through Early Call for Sites forms.

Typically, Council officers assigned sites to the 'first five years of the plan' where they were subject to extant or live permissions, had on-going pre-applications, were considered less complex or were part of wider development sites which were already under construction. Where sites had no planning history, these were deemed likely to come forward beyond the first five years. More detailed phasing analysis, informed by the next round of Deliverability Assessments, will be undertaken in preparation for the Proposed Submission Local Plan (Regulation 19).

5. Next Steps

This Site Selection Report has been prepared to support the Regulation 18 Plan and includes a detailed SSM outlining the stages of the process undertaken to date to help the Council identify potential site allocations. The Council is currently part-way through the SSM and this Report has outlined the outputs of the assessment to date.

The Regulation 18 consultation provides an important opportunity to gather information to support the suitability, capacity and deliverability assessments of potential sites allocations with landowners, developers and site promoters. The knowledge gained from this exercise will be a valuable input to the completion of the 5YHLS and trajectory.

Following the Regulation 18 consultation, preparation for the next phase of the site selection process can begin. The SSM will be an iterative process which will be further refined to form the basis of decision making on sites for allocation in the Proposed Submission Local Plan (Regulation 19). The SSM has provided commentary on the anticipated next steps for each of the assessment stages following Regulation 18 consultation including the further information that is expected to become available to support and verify the assessments. An updated version of the SSM and Report will be published as part of the Regulation 19 consultation.

Furthermore, the updated Site Selection Report will be reviewed by the Council alongside a suite of existing and further evidence base documents to consider which sites should proceed as potential allocations in the Proposed Submission Local Plan (Regulation 19) and their development potential. Such evidence includes the Preferred Spatial Option Report (Arup), the Integrated Impact Assessment (Arup), Green Belt and Metropolitan Open Land Review, Infrastructure Topic Paper (Arup), Ealing Character Study (Allies and Morrison)¹⁶, Housing Design Guide (Allies and Morrison)¹⁷, as well as a Tall Buildings Strategy and West London Strategic Flood Risk Assessment¹⁸.

¹⁶ Available at: [Ealing character studies | Ealing Council](#)

¹⁷ Available at: [Housing Design Guidance | Ealing Council](#)

¹⁸ Available at: [West London Strategic Flood Risk Assessment - West London SFRA](#)

Appendix A: Planning Policy and Guidance

A.1 National Planning Policy Framework (NPPF)

A.1.1 Plan-making

The NPPF¹⁹ states that “succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities,” (Paragraph 15) with the aim of being “prepared positively, in a way that is aspirational but deliverable” (Paragraph 16). Strategic policies must make sufficient provision for housing...employment, retail, leisure and other commercial development (Paragraph 20), and must look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities (Paragraph 22), which must include planning for, and allocating sufficient sites to deliver the strategic priorities of the area (Paragraph 23).

A.1.2 Delivering a sufficient supply of homes

In order to make sufficient provision for housing, “Strategic policy-making authorities should have a clear understanding of the land available in their area, through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.” Planning policies should identify a supply of:

- a) Specific, deliverable sites for years one to five of the plan period, and
- b) Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan. (Paragraph 68).

The terms “deliverable” and “developable” are defined in the NPPF (within Annex 2: Glossary), in the following terms:

- **Deliverable:**

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

The Planning Practice Guidance (PPG) (Paragraph: 007 Reference ID: 68-007-20190722) suggests that current planning status, firm progress towards the submission of an

¹⁹ Available at: [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/617353/National-Planning-Policy-Framework-2019.pdf)

application, firm progress with site assessment work, or clear and relevant information may be used as evidence to demonstrate deliverability.

The PPG further suggests that plan-makers can follow the Government's Housing and Economic Land Availability Assessment to demonstrate the deliverability of sites.

- **Developable:**

"To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged."

The NPPF also notes the following methods in contributing towards housing requirements:

- Small and medium sized sites;
- Brownfield registers;
- Through tools such as area-wide design assessments and Local Development Orders;
- Windfall sites (as long as "compelling evidence" is given showing that they will provide a reliable source of supply, through having realistic regard to the SHLAA, historic windfall rates, and expected future trends); and
- The sub-division of larger sites to speed up the delivery of homes (Paragraph 69)

The PPG outlines how plan-making authorities can demonstrate that housing sites are developable. A 'reasonable prospect' of development can be proven through evidence such as: written commitment or agreement of funding, evidence of agreement between the local authority and developer(s) confirming intentions, likely build-out rates based on sites of similar characteristics or current planning status (Paragraph 020 Reference ID: 68-020-20190722).

A.1.3 Building a strong, competitive economy and ensuring the vitality of town centres

Similarly, in terms of employment sites, the NPPF states that planning policies should "set criteria or identify strategic sites for local and inward investment to match the strategy and to meet anticipated needs over the plan period" (Paragraph 82). To ensure the vitality of town centres, the NPPF suggests taking a positive approach to their growth, management and adaption, through defining a "network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters" (Paragraph 86).

Planning policies should "allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead..." but "where suitable and viable town centre uses are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified need can be met in other accessible locations that are well connected to the town centre, and recognise that residential development often plays an important role in ensuring the vitality of centres, and encourage residential development on appropriate sites" (Paragraph 86).

A.1.4 Making effective use of land

The NPPF states that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-

developed or 'brownfield' land (Paragraph 119), while giving substantial weight to the value of using brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. Additionally, policies should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example, converting space above shops), and through supporting opportunities to use the airspace above existing residential and commercial premises for new homes (Paragraph 120).

The NPPF also states that "local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help bring more land forward for meeting development needs and/or secure better development outcomes" (Paragraph 121). The NPPF suggests that local planning authorities should also take "a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs", e.g. through supporting the use of retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality or viability of town centres, and would be compatible with other policies within the NPPF (Paragraph 123).

The NPPF states the need for planning policies and decisions to "support development that makes efficient use of land, taking into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- e) the importance of securing well-designed, attractive and healthy places" (Paragraph 124)

The NPPF also states that "area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently, while also creating beautiful and sustainable places. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site" (Paragraph 125). This can be achieved through the use of minimum density standards, which may be presented within policies as a range of densities, reflecting factors such as accessibility, city or town centre locations.

A.1.5 Green Belt land

The NPPF places great importance on Green Belt land, with the fundamental aim being to prevent urban sprawl through keeping land permanently open (Paragraph 137), and once established, Green Belt boundaries should only be altered when exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans (Paragraph 140). Before demonstrating these exceptional circumstances, the strategic policy-making authorities should be able to demonstrate that it has “examined fully all other reasonable options for meeting its identified need for development”, through ensuring that the strategy makes as much use as possible of suitable brownfield sites and underutilised land, ensuring the optimisation of density of development in town centre and city centres as well as other locations well served by public transport, and through discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground (Paragraph 141).

The NPPF also states that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land (Paragraph 145). This should be considered in taking forwards any site allocations which are currently designated as Green Belt.

A.1.6 Planning and flood risk

The NPPF states that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)” (Paragraph 159), and that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding (Paragraph 162).

A.1.7 Conserving and enhancing the natural environment and heritage assets

The NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment (Paragraph 174), and that “Plans should...allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries” (Paragraph 175).

The NPPF states that heritage assets range from sites and buildings of local historic value to those of the highest significance, and are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations (Paragraph 189). Any harm to, or loss of, the significance of a designated heritage asset (DHA) (from its alteration or destruction, or from development within its setting), should require clear and convincing justification (Paragraph 200).

A.1.8 Further guidance relevant to the site selection process

Planning Practice Guidance (PPG) on Housing Supply and Delivery (Reference ID: 68-004-20190722) states that in plan-making, strategic policies should identify a 5 year housing land supply from the intended date of adoption of the plan, and that for decision

making purposes, an authority will need to demonstrate this when dealing with applications and appeals. PPG states that this can be done one of two ways:

1. Using the latest available evidence, such as a Strategic Housing Land Availability Assessment (SHLAA), Housing and Economic Land Availability Assessment (HELAA), or an Authority Monitoring Report (AMR); or
2. Confirming the 5 year land supply using a recently adopted plan or through a subsequent annual position statement.

The PPG on Housing and Economic Land Availability Assessment (Reference ID: 3-005-20190722) is useful guidance in setting out how local planning authorities should determine the suitability, availability and achievability of land for development. The guidance sets out a staged approach of five steps through a flow diagram (see Figure 2).

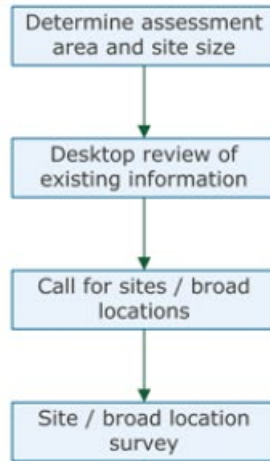
The five steps are:

- Stage 1 – Site / Broad Location Identification
- Stage 2 – Site / Broad Location Assessment
- Stage 3 – Windfall Assessment
- Stage 4 – Assessment Review
- Stage 5 – Final Evidence Base

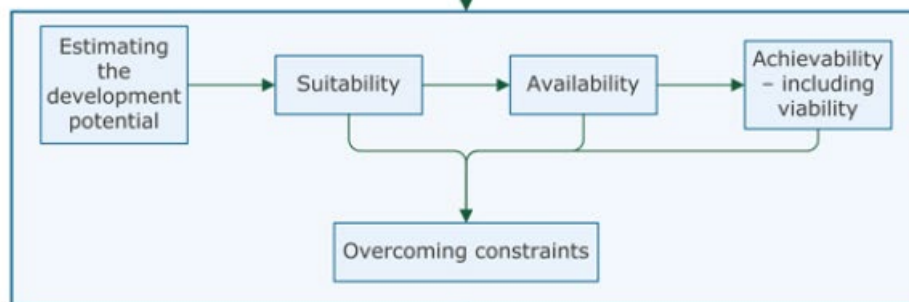
The PPG also includes guidance on the sites to be assessed, through characteristics such as site size, sources for identifying these sites, and the recommended criteria and procedure for assessing sites for their suitability, availability and achievability. This guidance has informed the SSM at each key stage.

Figure 2: PPG method for identifying and assessing sites

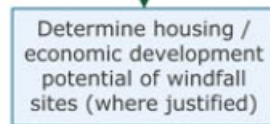
Stage 1- Site / broad location identification



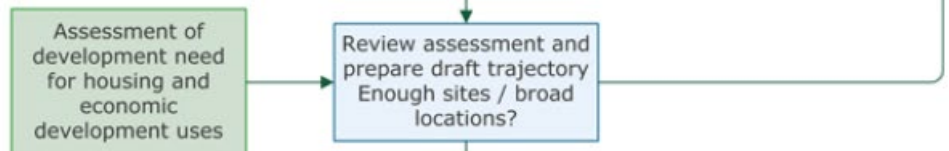
Stage 2 - Site / broad location assessment



Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base



A.2 The London Plan

As well as conforming to the policies and guidance set out within the NPPF and PPG, the SSM must also adhere to policies included within the London Plan (2021)²⁰.

A.2.1 Housing

The London Plan states that a range of sites must be identified and allocated to deliver housing locally, in order to make a housing market which works better for all Londoners (Policy GG4). The London Plan states that there is a need to increase housing supply, which should be supported within development plans, through the allocation of an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification, encouraging development on appropriate windfall sites, and through optimising capacity (Policy H1). The housing supply targets set out in Policy H1 (Table 4.1) require Ealing Local Planning Authority to deliver **21,570 homes over the ten year period from 2019/20-2028/29**.

The London Plan also highlights brownfield sites as potential sources for achieving these housing targets, on all suitable and available sites, particularly those with good public transport accessibility, as well as mixed-use redevelopment of car parks, low-density retail parks and supermarkets, intensification of appropriate low-density commercial, leisure and infrastructure sites, redevelopment of surplus utilities and public-owned sites, small sites (Policy H2), and through intensification of industrial sites (Policy E4, E5, E6, E7).

A.2.1.1.1 Small sites

The London Plan promotes the development of small sites within Policy H2, stating that boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making. It aims to significantly increase the contribution of small sites in meeting London's housing needs, while diversifying the sources, locations, type and mix of housing supply, and supporting small and medium sized house builders, while supporting custom, self-build and community-led development. Policy H2 (Table 4.2) sets out minimum targets for small sites, with the target for Ealing Local Planning Authority of **4,240 homes over the ten year period from 2019/20-2028/29**. Policy H2 of the London Plan also states that boroughs should, where appropriate, identify and allocate appropriate small sites for residential development, while listing these small sites on their brownfield registers, and granting permission in principle on specific sites or prepare local development orders.

A.2.1.1.2 Site capacity

The London Plan states the need to define an area's character to understand its capacity for growth, through undertaking assessments to define its characteristics, qualities and values including; demographic make-up, socio-economic data, housing types and tenure, urban form and structure, existing and planned transport networks, air quality and noise levels, open space, heritage assets, topography and hydrology, land availability, existing development plan designations, land uses and views and landmarks (Policy D1). These characteristics should enable the identification of suitable locations for growth, as well as

²⁰ Available at: [The London Plan 2021 | LGOV](#)

scale of growth. Policy D2 of the London Plan states that the density of development proposals should be linked to future planned levels of infrastructure and be proportionate to the site's connectivity and accessibility by walking, cycling and public transport to jobs and services.

The London Plan also recognises the importance of optimising site capacity through defining an area's 'design-led approach' (Policy D3) which differs from the previous density matrix. This design-led approach places greater value on ensuring the optimisation of site capacity based on the site's context and capacity for growth, and existing and planned supporting infrastructure capacity, with support for higher density developments generally being promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. The design-led approach also states that where existing sites have areas of high-density buildings, expansion of these areas should be positively considered where appropriate, including through expanding Opportunity Area boundaries.

The Draft Optimising Site Capacity: A Design-led Approach guidance²¹ (consultation February - March 2022 and due for publication later 2022) sets out how the design-led approach, set out in Policy D3 should be applied. This approach is the process of setting site-specific design parameters and codes for development sites to provide clarity over the future design. It should be used to determine the most appropriate form of development on a site.

A.2.1.1.3 Employment

Policy GG5 of the London Plan states the aim of conserving and enhancing London's global economic competitiveness and ensuring that economic success is shared amongst all Londoners. Therefore, sufficient employment and industrial space in the right locations to support economic development and regeneration must be planned for. The London Plan also states that boroughs should take a town centre first approach, discouraging out-of-centre development of main town centre uses, unless there are no suitable town centre sites available or expected to become available within a reasonable period, consideration should be given to sites on the edge-of-centres that are, or can be, well integrated within the existing centre, local walking and cycle networks, and public transport (Policy SD7). The London Plan also suggests the potential of existing out-of-centre retail and leisure parks in delivering housing intensification through redevelopment and ensuing such locations become more sustainable in transport terms, through improvements to public transport and walking and cycling.

A.2.1.1.4 Industrial sites

The London Plan does not include an industrial need figure for Ealing Council, but the supporting text for Policy E4 states that from 2001 to 2015, over 1,300 hectares of industrial land (including SILs, LSIS, and non-designated industrial sites) was released to other uses within London as a whole. This was well in excess of previous monitoring benchmarks, and research for the Greater London Authority (GLA) indicates that there will be positive net demand for industrial land in London over the period 2016 to 2041, mostly driven by a strong demand for logistics.

The GLA's assessment states that after factoring in both the positive net land demands and the management of vacancy rates, there would be scope to release a further 233

²¹ Available at: [Optimising Site Capacity: A Design-led Approach LPG | LGOV \(london.gov.uk\)](https://london.gov.uk/optimising-site-capacity-a-design-led-approach-lpg)

hectares of industrial land across London over the period of 2016 to 2041. However, the demand assessment also shows that in 2015, 185 hectares of industrial land already had planning permission to change to non-industrial use, and a further 653 hectares were earmarked for potential release in Opportunity Area Planning Frameworks, Local Plans and Housing Zones. Therefore, the London Plan addresses the need to provide sufficient industrial, logistics and related capacity through its policies, and states that where possible, all boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence.

The London Industrial Land Demand Study²² (LILDS, 2017) which underpins the London Plan classifies Ealing as 'Provide capacity'²³ borough based on a net demand projection of 35.6 hectares of industrial land over the period 2016 to 2041.

Policy E7 of the London Plan encourages boroughs to explore the potential to intensify industrial activities on industrial land to deliver additional capacity and to consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential and other uses. The Policy also states that there may be scope for selected parts of SILs or LSISs to be consolidated or appropriately substituted. This should be done through a carefully co-ordinated plan-led approach to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the release of some land for a mix of uses including residential.

Summary

These key requirements identified in national and regional planning policy and guidance have been taken into account in the formulation of this site selection methodology, the application of which will produce the evidence necessary to justify the land allocations within the Local Plan.

²² Available at:

https://www.london.gov.uk/sites/default/files/london_industrial_land_demand_study_2017_commissioned_by_the_gla.pdf

²³ Provide Capacity – where Boroughs are experiencing positive net demand for industrial land and should seek some way to accommodate that demand

Appendix B: Existing/Emerging Evidence from Studies Relevant to Site Selection

A range of evidential sources have informed the site selection process. Some of these contain reference to and recommendations about how data should inform the later stages of the plan making process, including site selection. The relevant evidence base studies are outlined below:

B.1 London Strategic Housing Market Assessment (SHMA) (2017)

The London Plan identified, through a Strategic Housing Market Assessment (2017) that London requires 66,000 homes to be delivered per annum to ensure the needs of the population are met. In order to identify how and where these needs could be met, the Mayor conducted a Strategic Housing Land Availability Assessment (SHLAA) (2017)²⁴.

B.2 London Strategic Housing Land Availability Assessment (SHLAA) (2017)

The London-wide SHLAA was undertaken in 2017 to inform the London Plan as it determines the boroughs housing targets that form a key part of the Plan. The SHLAA includes an assessment of large sites (of 0.25 hectares and more in size) that is undertaken in partnership with boroughs and an assessment of capacity from small sites below this threshold. The sites were assessed by local planning authorities (LPAs) and the GLA through the SHLAA system in order to establish capacity, availability, deliverability, probability and their suitability for residential and mixed use development. The assessment was designed to take into account the range of planning policy, environmental and delivery constraints and the extent to which they can be mitigated or addressed during the plan period to 2041.

The London SHLAA provides one of the sources of sites for the SSM; however, given the time that has passed since this was undertaken, Ealing Council's officers have selected preferred sites based on up to date site knowledge and context. Further, it should be noted that the SHLAA is not a site allocation exercise in itself. It is instead designed to give an indication of aggregated housing capacity. The SHLAA's constraints-based approach recognises that not all potential sites identified in the assessment will come forward for housing. Therefore, the SHLAA acts as a starting point for the site allocation process, rather than determining what is allocated.

B.3 London Borough of Ealing Strategic Housing Market Assessment Update (20128)

Opinion Research Services (ORS) was commissioned by the West London Housing Partnership to prepare a Strategic Housing Market Assessment (SHMA) for the area, and

²⁴ Available at: https://www.london.gov.uk/sites/default/files/2017_london_strategic_housing_land_availability_assessment.pdf

for each of its constituent planning bodies. The West London Housing Partnership comprises the London Boroughs of Barnet, Brent, Ealing, Hammersmith & Fulham, Harrow, Hillingdon, Hounslow and the Old Oak and Park Royal Development Corporation. It considers the needs of Ealing as a separate planning authority²⁵ and the results are then aggregated with the remaining planning authorities across West London to form a sub-regional SHMA as a separate document. The Report includes 'Figure 2' which summarises the Full Objectively Assessed Need for Housing across Ealing, including a 20% response for market signals and 1.2% vacancy and second home rate (see Figure 3 below):

Figure 3: Extract from LBE SHMA Update: 'Figure 2'

Figure 2: Full Objectively Assessed Need for Housing for Ealing 2016-41

Stage	Ealing	
	GLA Central Trends	GLA "Housing Types" scenario
Demographic starting point: CLG household projections 2016-41 (note: CLG 2014 runs to 2039. Final two years are an average of annual change 2016-39)	40,670	
Difference between CLG and GLA	+550	-16,708
Baseline household projections based on GLA data 2016-41	41,220	23,962
Allowance for transactional vacancies and second homes	+501	+291
Housing need based on household projections taking account of local circumstances and vacancies and second homes	41,721	24,253
Adjustment for suppressed household formation rates. Concealed families and homeless households with allowance for vacancies and second homes	2,144 + 26 = +2,170	
Baseline housing need based on demographic projections	43,891	26,423
In response to market signals	20% x 41,721 = 8,334	20% x 24,253 = 4,851
Dwellings needed (in addition to the adjustment for concealed families and homeless households)	(8,334 - 2,170) = +6,174	(4,851 - 2,170) = +2,681
Full Objectively Assessed Need for Housing 2016-41	50,064	29,104

Therefore, based upon the GLA 2016 round central trend migration projections the SHMA identifies the Full Objectively Assessed Need for Housing in Ealing to be a rounded figure of 50,100 dwellings over the 25-year Plan period 2016-41, equivalent to an average of 2,004 dwellings per year.

The SHMA established the balance between the need for market housing and the need for affordable housing. This analysis identified a need to increase the overall housing need by 2,144 households to take account of concealed families and homeless households that

²⁵ Available at: [Ealing Strategic Housing Market Assessment | Ealing Council](#)

would not be captured by the household projections. The housing mix analysis identified a need to provide 18,100 additional affordable dwellings over the 25-year period 2016-41 (an average of 724 per year), representing 36.1% of the OAN for Ealing. This would provide for the current unmet needs for affordable housing in addition to the projected future growth in affordable housing need but assumes that the level of housing benefit support provided to households living in the private rented sector remains constant.

Furthermore, the SHMA outlined that the three main sources of household growth in the area were:

- The impact of an ageing population will see more older single persons and couples. The majority of these households are already occupying dwellings in Ealing and the majority will not wish to downsize from the family size homes they currently occupy;
- The largest growth in projected households is for couples without dependent children, with the main growth being in households aged 55+, again the majority will not wish to downsize from the family size homes they currently occupy; and
- Other households include multi-generation households and also those who occupy Houses in Multiple Occupation. These households would typically require at least 3 bedrooms in their property.

It concluded that all three sources of household growth are associated with either the continued occupation of family sized dwellings, or new households who require family sized dwellings. In addition, families with children are projected to remain a significant group; the third largest group by 2041 (44,000) and these will require family sized two or three+ bedroom homes.

The SHMA also set out the need for 4,800 specialist older person additional housing units of various types over the period 2016-41; however almost a half of this need (48%, 2,300 dwellings) is for Leasehold Schemes for the Elderly housing. The total need for older person housing therefore represents around 4.5% of the overall OAN (50,100) for Ealing.

B.4 West London Employment Land Evidence (2019) and update (2022)

Ealing has two types of industrial designation, Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS). In addition, all non-designated industrial uses in the borough form part of the industrial baseline. Ealing's industrial needs are simply the net figure of demand against supply.

The West London Employment Land Evidence Report²⁶ (West London Alliance) categorises Ealing as a 'provide capacity' borough, alongside Brent, as it is a borough where strategic demand for industrial, logistics and related uses is anticipated to be the strongest. It states that Ealing should seek to deliver intensified floorspace capacity in either existing and/or new locations, accessible to the strategic road network, and in locations with potential for transport of goods by rail / water.

The Report states that Ealing's requirements are driven by significant B8 demand, from logistics (primarily wholesaling but also warehousing), but that falls in manufacturing generally mitigate the overall need. The degree to which manufacturing sites are likely to be suitable for future logistics needs is considered separately in the study.

Figure 4: Extract from the West London Employment Land Evidence 'Table 71'

Table 71: **Ealing industrial land needs (ha)**

	B1c	B2	B8	Total
Manufacturing		- 19.09		-19.09
Building Trades			2.89	2.89
Other	0.92	1.26	1.44	3.62
Transport			-1.62	-1.62
Logistics			15.15	15.59
Total	0.92	-17.83	17.86	0.95

The results of this study are provided as an alternative to the London Industrial Land Demand Study (2017) which provides supporting evidence to the London Plan. Even with sensitivity testing on employment densities, the logistics requirements identified for Ealing and Brent are considerably lower than in the LILDS which rolls forward the 1998-2008 floorspace change.

The Report states that requirements are generated by borough boundary therefore there is no disaggregation for OPDC between Ealing and Brent. Consideration for the apportionment of needs should take into account that approximately 35% of each borough's industrial floorspace is located in OPDC and that Park Royal is the single largest estate in the study area with a commensurate level of demand.

²⁶ Available at: https://www.ealing.gov.uk/downloads/download/6596/wl_employment_land_evidence_report

Figure 5: Extract from the West London Employment Land Evidence: 'Table 80'

Table 80: Industrial land needs (0.65 plot ratio) vs LILDS (ha)

	West London Evidence						LILDS			
	Logistics	Manufact'g	Building Trades	Transport	Other	West Lon Total	Wareh'g	Industrial	Sub total	LILDS Total
Barnet	7.7	-4.1	3.3	0.7	5.8	13.5	9.3	-2.2	7.1	7.3
Brent*	13.4	-14.7	1.3	-3.1	3.7	0.6	60.9	-21.6	39.3	43.0
Harrow	2.8	-3.9	2.1	-0.7	2.1	2.5	4.0	-5.1	-1.1	1.2
Ealing**	15.2	-19.1	2.9	-1.6	3.6	1.0	49.7	-18.8	30.9	35.6

* logistics 18.1ha and total of 5.3ha under a higher employment density

** logistics 21.0ha and total of 7.8ha under a higher employment density

The West London Employment Land Evidence Report (2019) concluded that there is a **net deficit of industrial provision of 1ha**. In 2021/22 the West London Employment Land Review²⁷ was undertaken and concluded that for Ealing there is clear evidence that for the foreseeable future the levels of strong demand will continue as the borough remains a desirable occupier location with good access, an industrial land pool and access to target populations. It states that employment growth in this sector in recent years has been strong and the leasing and GVA growth outlook is very strong for wholesaling and warehousing, casting doubt on any slowdown in location based activity and employment. Furthermore, demand is acute and the protection of space and provision of new premises is essential, whilst the upgrading of older stock is desirable. Overall it was concluded that it is critical that in Ealing as much functional industrial floorspace as possible is retained and upgraded; and there is a need to deliver additional floorspace where feasible in line with the conclusions of the 2019 study.

B.5 Preferred Spatial Option Report

A Preferred Spatial Option Report has been produced by Arup to determine the most sustainable pattern of development across the borough. The SSM for Regulation 18 consultation includes a suitability criterion which assesses a site's contribution to the Local Plan spatial development pattern (including emerging Neighbourhood Centres as defined in draft policy). The development of a more detailed capacity assessment for the Proposed Submission Local Plan (Regulation 19) will factor in impacts of the Preferred Spatial Option on baseline capacity, which may result in reductions or uplifts to site capacity to reflect those areas identified for potentially significant, moderate or lower levels of development.

B.6 Integrated Impact Assessment

An Integrated Impact Assessment (IIA) has been undertaken by Arup. The IIA process has involved the assessment of the emerging spatial options, policies and site allocations that

²⁷ Available at: [West London Employment Land Review | Ealing Council](#)

form the Regulation 18 Local Plan to promote sustainable development, health and equality through better integration of social, environmental and economic considerations.

It is noted that the IIA process is led by consideration of site opportunities; whereas the purpose of the SSM at this stage is to flag the constraints and issues that need to be considered as part of a site's development. Through the next stage of the SSM more detail will be gathered on sites to inform an understanding of site-level mitigation, which in turn will assist the Council in formulating design principles for site allocations and detailed policies. Therefore the assessment methodologies for the IIA and the SSM have a different purpose and the scoring approach therefore differs across the two criteria-based assessments. The outcomes of the SSM and IIA will be reviewed together in order to inform final decisions on site allocations for the Proposed Submission Local Plan (Regulation 19), alongside other evidence base work.

B.7 West London Strategic Flood Risk Assessment

The West London Strategic Flood Risk Assessment (SFRA) was produced by the West London boroughs of Barnet, Brent, Ealing, Harrow, Hillingdon and Harrow, in order to conform with the PGG on Flood Risk and Coastal Change, which defined a SFRA as “a study carried out by one or more local planning authorities to assess the risk to an area from flooding from all sources, now and in the future, taking account of the impacts of climate change, and to assess the impact that land use changes and development in the area will have on flood risk” (Reference ID: 7-009-20140306). The SFRA has been used as part of the site suitability criteria (as detailed in Appendix C), to identify the sites at risk of flooding. Fluvial / tidal and surface water flooding have been assessed together, with sites assessed as to whether they are located within flood zone 1, 2, 3a/b (fluvial or tidal) or 3a (surface water).

A level 2 SFRA (Site Specific Sequential and Exception Test) will be undertaken following the completion of Regulation 18 consultation once the final list of potential site allocations has been confirmed.

B.8 Ealing Character Study, Housing Design Guide and Tall Buildings Strategy

Ealing Council have published an Ealing Character Study, Housing Design Guide and Tall Buildings Strategy plus Appendix: Guide for Study Sites (Allies and Morrison, 2022)²⁸ as part of the evidence base for its emerging Local Plan, to form a robust basis for a plan-led growth strategy across Ealing borough. The Character Study is split into two parts:

- A1 Report – Borough-wide Characterisation – this draws together baseline analysis of the borough's defining characteristics, undertaken through desktop studies, site visits and input from Council officers and builds a detailed historical, socio-economic and environmental portrait of the borough.

²⁸ The Character Study Parts 1 and 2 reports and the Housing Design Guide were published in January 2022. Available here: [Ealing character studies | Ealing Council](#) The Tall Buildings Strategy and Appendix: Guide for Study Sites will be published as part of the evidence base for the Regulation 18 Local Plan.

- A2 Report – Typologies and Scope for Growth - this builds on information in the A1 Report and explores development and growth opportunities in more detail through the characteristic typologies, development blocks and town areas of the borough.

The SSM outlines where the capacity assessment has drawn upon the assessment outcomes from this Study.

B.9 Green Belt and Metropolitan Open Land Review

The Council has undertaken a Green Belt (GB) and Metropolitan Open Land (MOL) Review Stage 1 Report (November 2022) for Regulation 18 consultation. This provides a baseline review of GB and MOL sites and an assessment of their contribution towards the criteria / objectives of their designation. It also considers appropriate boundary changes and potential designation changes based on the findings of this assessment. Stage 2 will consider opportunities for enhancing GB/MOL sites. Stage 3 will then consider what limited enabling development may be required to enhance sites and whether there is evidence of any exceptional circumstances that would justify the limited release of GB/MOL to meet unmet need – firstly for recreation uses, but also potentially for housing, employment land, social infrastructure, or Gypsy and Traveller accommodation.

The Stage 1 Review was undertaken in parallel with the SSM and therefore the results have not yet informed the preferred site assessments. However, any preferred site currently designated GB or MOL to be taken forward for potential allocation at Regulation 19 will be assessed against the findings of these reports. A criterion has been drafted to frame this assessment at a later stage of the SSM.

B.10 Site-Level Feasibility Assessments

A number of site-level feasibility studies previously commissioned by Ealing Council have been reviewed and have informed the high level capacity assessment.

Appendix C: Detailed Methodology for Suitability and Deliverability Assessments

Each of the preferred sites were subject to detailed criteria-based assessments, aiming to establish their suitability and deliverability.

- Sections C.1 and C.3 presents the **21 criteria** for which there was considered to be sufficient information and evidence to undertake an initial assessment for the purposes of the Regulation 18 Local Plan.
- Sections C.2.1 and C.4.1 presents an additional **8 criteria** which have been identified for assessment following Regulation 18 consultation; at which time more information is likely to be available to evidence decision-making. The majority of these criteria relate to the deliverability assessment.

The sites were assessed against the 21 criteria using a combination of quantitative and qualitative methods, alongside the professional judgement of Ealing Council officers, and Arup specialists. It is important to note that while a RAG rating system was used, sites were not ranked against each other, nor were the criteria ranked in significance; moreover, this rating system was designed to provide a robust and standardised assessment of individual site characteristics, to inform the Council's future decision-making around which sites should be allocated in the Local Plan.

Across all assessments, scoring was undertaken using the information available at the time of the assessment.

It is anticipated that scoring may change as more detail on the types of development likely to come forward on sites is provided as part of the Regulation 18 consultation, additional information supplied through the land promoter / developer survey and Call for Sites submissions. At this stage, it will become clearer what types of intervention may be required to mitigate impacts of future development and the extent to which this would impact the site's suitability for development. Scores will be adjusted as appropriate to reflect these proposals.

As such, Sections C.1 and C.3 highlight the information which was available to inform the assessment prior to Regulation 18 consultation and the additional information which is likely to be available following this consultation where relevant.

Many of the sites were assessed quantitatively using GIS tools, however some criteria also included qualitative assessments where professional judgement was required. Where this was the case, a combination of Ealing Council officers and Arup specialists have been employed in order to carry out these assessments. In assessing these qualitative criteria, a narrative justifying all planning judgements has been provided, as well as any recommendations for mitigation which may be needed.

To ensure a robust Quality Assurance approach was incorporated into the assessment process, various measures were in place, including:

- Undertaking assessments for a sample of sites, to review the approach and identify any potential issues;
- Members of the assessment team were allocated specific criteria, and were responsible for reviewing all sites against these criteria, to maximise the consistency of assessment; and

- Regular spot checks were undertaken to ensure consistency of approach to assessing each criterion.

It should also be noted, that unless otherwise stated:

- All preferred sites were assessed using a consistent scoring approach against each criterion. However, interpretation of the assessment results may depend on the proposed use of the site (e.g. flood risk would have a more significant impact on vulnerable uses);
- GIS data and other evidence base documents which informed the assessments, have been identified; and
- Where available, the assessments took into account any additional information held by Ealing Council on individual sites, e.g. through the Call for Sites process.

C.1 Suitability Assessments for Regulation 18

The PPG advises on the approach to suitability assessments within the context of a Housing and Economic Land Availability Assessment (HELAA) (Paragraph 017, Reference ID 3-018-20190722). This guidance is considered helpful in assessing potential site allocations. The guidance states that a site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. These suitability assessments of identified sites should take into account the range of needs for housing, economic and other uses, and should consider national policy, appropriateness and likely market attractiveness for the type of development proposed, contribution to regeneration priority area, and potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation.

This section sets out each criterion as well as the approach to scoring the sites, however in summary, the suitability assessments at Regulation 18 stage comprised:

Suitability Criteria
Flooding - fluvial / tidal and surface water
Heritage
Air quality
Health and safety
Biodiversity
Geodiversity
Tree Preservation Order
Brownfield vs Greenfield Land
Contamination
Employment – industrial designated and non-designated land
Local Plan spatial development pattern

Accessibility - PTAL
Vehicular access to the site
Impact on provision of open space
Access to open space
Distance to nearest infant/primary school
Distance to nearest secondary school
Distance to nearest GP surgery

C.1.1 Flooding - fluvial / tidal and surface water

(+)	0	(-)
Site is located within flood zone 1.	Site is located within flood zone 2.	Site is located within flood zone 3a/b (fluvial or tidal) and/or, 3a (surface water).

This assessment was undertaken by Arup specialists. The data for this assessment was sourced from West London Strategic Flood Risk Assessment Policy Map²⁹.

Quantitative Assessment

- Sites which fell within one flood zone were scored accordingly.
- Sites which fell within the higher risk flood zones were flagged for qualitative assessment.

Qualitative Assessment

Information available prior to Regulation 18 consultation

Sites which fell within the higher risk flood zones were assessed qualitatively to determine the extent to which these zones (Zones 2, 3a and 3b) would constrain development, taking into account the spatial extent of flood zones versus site area (in terms of overall proportions, configuration etc.) and the extent to which this would constrain some/all of the site for development.

Information available following Regulation 18 consultation

Following this, a further qualitative assessment will be undertaken to identify whether any mitigation could be provided, and whether this would impact the site's suitability for development, for example:

- The proposed use of the sites and significance of impact based on vulnerability;
- Whether the proposed site layout/development density (where known) aligns with the mapped flood constraints;
- Whether the proposed development could be re-orientated to mitigate against the flood risk;
- For a site straddling multiple flood zones, it may be judged that, as a result of only a small part of a site being constrained by higher flood risk zones, and where the site

²⁹ <https://metis.maps.arcgis.com/apps/webappviewer/index.html?id=80305613f5f14835b7fc8891cfaca17a>

layout would allow for this to be avoided through site layout, a score of (+) could be assigned.

A level 2 SFRA (Site Specific Sequential and Exception Test) will be completed following the Regulation 18 engagement and once the final list of potential site allocations has been confirmed.

C.1.2 Heritage

(+)	0	(-)
<p>Site could enhance the significance of the heritage asset or designation/ further reveal its significance/ enhance the setting; or</p> <p>Site is not likely to affect heritage designations/ assets due to their distance from the site.</p>	<p>Site is located within a Conservation Area/ its setting or contains/ is within the setting of a heritage asset and its likely effects can be mitigated.</p>	<p>Site is located within a Conservation Area/ its setting or contains/ is within the setting of a heritage asset and its unlikely effects can be mitigated; or</p> <p>Proposals would likely result in the loss of a heritage asset.</p>

This assessment was undertaken by Ealing Council's heritage officer. The data for this assessment was sourced from Historic England and Ealing Council.

Quantitative Assessment

The quantitative assessment for this criterion used GIS data to identify the presence of heritage assets/ designations within the site boundary, or presence of heritage assets/ designations within the identified buffers. Sites with no heritage assets/ designations within the boundary nor within the above buffers were automatically scored as (+).

Sites with heritage assets/ designations within the following distances were flagged for qualitative assessment:

- 100 m of Local Heritage Assets;
- 500 m of Conservation Areas;
- 500 m of Registered Parks and Gardens;
- 500m of Grade II listed buildings;
- 500m of Grade II* listed buildings;
- 1 km of Grade I listed buildings;
- 1 km of Scheduled Ancient Monuments.

Qualitative Assessment

Information available prior to Regulation 18 consultation

Sites flagged as containing a heritage asset/ designation within the buffers identified above, were qualitatively assessed to determine the likely impact of the site's development on the heritage asset/ designation. This took into account:

- The type of heritage asset/ designation;
- Distance to the heritage asset/ designation and position relative to the site;

- The extent to which proximity to a heritage asset/ designation may impact development of a site due to potential harm or where development of the site could enhance the heritage asset/ designation;
- Possible mitigation to reduce impact on heritage asset/ designation.

Where sites are located at the outer edge of buffers and are unlikely to have a significant impact on any heritage asset/ designation, these sites were scored (+). Sites were also scored (+) if there was notable enhancement potential. At this stage of the assessment, enhancement was considered in terms of where redevelopment could present opportunity to remove an out of character building and provide a high quality development in its place, thereby resulting in positive impacts on the character of the area.

The qualitative assessment considered the impact of heritage assets located outside of the borough, where the assets were still located in close proximity to the preferred sites. It should be noted that information relating to the locations of locally listed heritage assets within neighbouring boroughs was not available and so has not informed this assessment.

The assessment undertaken was entirely desk-based and based on the professional judgement of the Council's heritage officer.

Information available following Regulation 18 consultation

- A further qualitative assessment will be undertaken to identify whether any mitigation could be provided to protect or enhance impacted heritage assets/ designations, and whether this would affect the site's suitability for development;
- As part of the development of the new Local Plan, there are several proposed changes to the boundaries of Ealing's existing Conservation Areas, which may affect the scoring of this assessment. These changes are subject to statutory consultation and will not come into effect before the Regulation 18 consultation. Any potential impact these changes have on the scoring will be reviewed at a later date.

C.1.3 Air quality

(+)	0	(-)
Site/ surrounding area is not located within an area which exceeds the following limits: - PM10 30µg/m3 - NO2 30µg/m3	Part of the site/ surrounding area is located within an area which exceeds the following limits, and mitigation would be required: - PM10 30µg/m3 - NO2 30µg/m3	Site is located within an area which exceeds the following limits, and mitigation would be required: - PM10 30µg/m3 - NO2 30µg/m3

This assessment was undertaken by Arup specialists. The data for this assessment was sourced from London Atmospheric Emissions Inventory³⁰.

Quantitative Assessment

The quantitative assessment was to identify the air quality for each site and a buffer of 50m was applied to each site to represent a site's surrounding area. Sites and their

³⁰ Available at: <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory--laei--2019>

surrounds which were not located in an area exceeding the identified limits scored a (+). Sites wholly / majority located in affected areas scored a (-), and parts of sites/ surrounds located within affected areas were scored a (0), suggesting mitigation would be required as part of future developments.

C.1.4 Health and safety

(+)	0	(-)
Not within a specified consultation zone of a constraint with health and safety considerations.	Fully or partially within a specified consultation zone of a constraint with health and safety considerations.	N/A

This assessment was undertaken by Arup specialists. The data for this assessment was sourced from Ealing Council.

Quantitative Assessment

The quantitative assessment used GIS data to identify the presence of any constraints with health and safety considerations within the site boundary. These included:

- Gas pipes (Inner and Outer Consultation Zones)
- Electricity cables
- Substations
- Northolt Air Safety Area

Sites with no constraints were automatically scored a (+). Sites fully or partially overlapping with a constraint layer were scored (0) as further consultation would be required with the relevant consultee to determine whether development would be impacted.

C.1.5 Biodiversity

(+)	0	(-)
<p>SINC/ green corridor/ priority habitat/ancient woodland is retained and there are opportunities to enhance existing features; or</p> <p>There is no overlap between the site and/or the site is not likely to affect SINC/ green corridor/ priority habitat/ ancient woodland due to distance from the site.</p>	<p>Site is likely to have limited indirect or no effect on SINC/ green corridor/ priority habitat/ ancient woodland as features could likely be retained, or effects mitigated.</p>	<p>Site overlaps or is adjacent to SINC / green corridor/ priority habitat/ ancient woodland and will likely result in the partial or complete loss of the feature. Therefore it is unlikely effects of the development can be satisfactorily mitigated.</p>

This assessment was undertaken by Arup Ecology specialists. The data for this assessment was sourced from Ealing Council.

Quantitative Assessment

The quantitative assessment used GIS data to identify sites which were located within a 1km buffer of any of the following designations:

- Green corridors;
- Priority habitats;
- Sites of Importance for Nature Conservation (SINCs). Two categories of SINC were assessed – those of borough importance (SBINC) and local importance (SLINC).

Any sites which were not located within identified buffers for any of the designations were scored (+), and any sites which fell within any of the buffers were flagged for qualitative assessment.

Qualitative Assessment

Information available prior to Regulation 18 consultation

Sites within a 1km buffer of a designation were assessed qualitatively to consider the site's characteristics and potential impacts, including:

- Whether the site included designations within its boundary;
- Whether there was any connectivity between the site and nearby designations.

Where the location and surrounding uses or environment of a site may lead to potential impacts on biodiversity, the assessment states that mitigation will be required.

Prior to Regulation 18, there was insufficient information available on future proposals to determine the extent to which a site could enhance existing features within the site boundary or seek to improve connectivity between designated sites.

At this stage, positive scores were therefore given to sites where there was sufficient distance from designated sites to ensure that there would likely be no negative impact.

Sites scored (0) in instances where designations did not fall within the site boundary, but it was recognised that some level of mitigation may be required through site layout and reduced capacity in order to manage:

- Construction impacts (noise/ disturbance, lighting, dust pollution etc.);
- Operational impacts (lighting, noise/ disturbance etc.).

In the cases of negative scoring, a 'worst case' scenario was assumed due to biodiversity designations falling within the site boundary. These assessments were undertaken with the assumption that future development on the site may lose in the result of features, with limited opportunities for mitigation, particularly given the requirements for sites to provide Biodiversity Net Gain.

Information available following Regulation 18 consultation

A further qualitative assessment will be undertaken to identify:

- What types of mitigation could be provided to protect or enhance the site's ecological value, and whether this would impact the site's suitability for development;
- Whether there is any further information on indirect effects (e.g. construction impacts or operational noise, shading or lighting impacts) which would impact the site's suitability for development.

C.1.6 Geodiversity

(+)	0	(-)
There is no overlap between the site and/or the site is not likely to affect regionally important geological site due to its distance from the site.	Site is likely to have limited indirect or no effect on regionally important geological site as features could likely be retained, or effects can likely be fully mitigated.	Site overlaps or is adjacent to regionally important geological site and will likely result in the partial or complete loss of the feature. Therefore it is unlikely the effects of the development can be satisfactorily mitigated.

This assessment was undertaken by Arup specialists. The data for the assessment was sourced from Ealing Council.

Quantitative Assessment

The quantitative assessment used GIS data to identify sites which were located within a 1km buffer of the Regionally Important Geological Site designation³¹. Any sites which were not located within the identified buffer were scored (+), and any sites which fell within the buffer were flagged for qualitative assessment.

Qualitative Assessment

Information available prior to Regulation 18 consultation

Sites within a 1km buffer of the designation were assessed qualitatively to consider the site's characteristics and potential impacts, including:

- How development may impact upon public access to, appreciation and interpretation of geodiversity;
- How development may impact upon the provision of habitats for biodiversity or the delivery of ecosystem services.

Information available following Regulation 18 consultation

Following this, a further qualitative assessment will be undertaken to identify:

- Whether development could make a positive impact on the protection / enhancement of geodiversity;
- What specific types of mitigation could be provided to protect or enhance the site's geodiversity, and whether this would impact the site's suitability for development.
- Whether there is any further information on indirect impacts on biodiversity, ecosystems, public access or appreciation of geodiversity, which would impact the site's suitability for development.

³¹ As defined in Policy G9 of the London Plan (2021)

C.1.7 Tree Preservation Order

(+)	0	(-)
The intensity of site development would unlikely be constrained by the presence of protected trees either on or directly adjacent to the site; or Site has no effect due to distance from TPO(s).	The intensity of site development would likely be constrained by the presence of protected trees either on or directly adjacent to the site	The site likely has severely limited feasibility for development as a result of the extensive presence of protected trees, either on or directly adjacent to the site. There is likely to be limited opportunity to offer suitable mitigation through redesign.

This assessment was undertaken by Arup specialists. The data for the assessment was sourced from Ealing Council.

Quantitative Assessment

The quantitative assessment used GIS data to identify the presence of protected trees either on, or adjacent to the site. Sites that did not contain or were not within 15 m of a protected tree were scored (+), while all other sites were flagged for qualitative assessment.

Qualitative Assessment

Information available prior to Regulation 18 consultation

Sites located within 15 m of a protected tree, or sites containing protected trees were qualitatively assessed, where consideration was given to the distribution and density of protected trees across the site. Professional judgement was then made regarding whether protected trees were a minor or major constraint.

Information available following Regulation 18 consultation

A further qualitative assessment will be undertaken to identify whether the impact could be mitigated or not. Consideration will be given to the following:

- Constraints to access;
- Root protection areas;
- Buffer zones around the site and consideration of fragmentation damage if removal is necessary.

C.1.8 Brownfield vs Greenfield Land

(+)	0	(-)
Majority/ all of the site is previously developed land	N/A	Majority/ all of the site is greenfield land

This assessment was undertaken by Arup specialists using aerial imagery.

Qualitative Assessment

This assessment identified whether a site is majority greenfield or brownfield land based on a qualitative, desk-based assessment of land-use coverage using aerial imagery as well as the Council's 2019 brownfield land register GIS layer as a reference. Land uses were judged as brownfield based on the definition of 'Previously Developed Land' as set out in Annex 2 (Glossary) of the NPPF (2021).

C.1.9 Contamination

(+)	0	(-)
No contamination issues identified on site to date.	Potential contamination on site, which could be mitigated.	Potential severe contamination on site, where assurances would have to be sought from the developer that remediation would not harm site viability.

This assessment was undertaken by Ealing Council's contaminated land officer. The data used in the assessment was sourced from Ealing Council.

Quantitative Assessment

The sites were assessed wholly by the Council's contaminated land officer using Council's contaminated land records.

Qualitative Assessment

Information available prior to Regulation 18 consultation

Ealing Council's contaminated land officer reviewed the contamination risks associated with each site, and used professional judgement to score each site according to:

- The extent of the contamination on the site;
- The possibility for mitigation.

The assessment was based on Council records, a review of existing uses and the likelihood of prior remediation having taken place. For instance, a site featuring a residential development may score positively due to the likelihood of prior remediation.

For sites where there were no Council records and the likelihood of contamination could not be inferred from the site context, the requirement for a desk-based assessment to be carried out prior to development was acknowledged.

Where a site has existing planning permission, it may have been scored positively on the basis of existing contamination reports or conditions. However it is noted that any further development on these sites will require a gap analysis to determine whether existing planning requirements apply to the whole site.

Information available following Regulation 18 consultation

A further qualitative assessment will be undertaken to help confirm the presence of contamination on site and whether mitigation required would impact on the site's suitability.

C.1.10 Employment – industrial designated and non-designated land

(+)	0	(-)
Not within a designated or non-designated industrial area; or Site is within a designated or non-designated industrial area and given the proposed use is unlikely to result in net loss / may result in net increase of industrial floorspace (through mixed use intensification).	Site is adjacent to a designated industrial site and mitigation may be required to ensure no negative impacts on current industrial occupiers and their operations or the future capacity of the industrial site to accommodate any conforming industrial use.	Given the proposed use, site may result in a net loss of designated or non-designated industrial floorspace.

This assessment was undertaken by Arup specialists. The data for the assessment was sourced from London Data Store (LSIS ³² and SIL ³³) as well as review of aerial imagery.

Information available prior to Regulation 18 consultation

Quantitative Assessment

Through GIS, designated industrial sites including Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS) were identified. Sites not located within SILs and LSISs were also checked for the presence of industrial uses using aerial imagery, as non-designated sites form part of the industrial baseline and will be subject to industrial policies in the emerging Local Plan. If no industrial uses are present (designated or non-designated), the site was scored a (+).

Qualitative Assessment

Sites which are located within a designated or non-designated industrial area, were assessed qualitatively. Where the proposed use of a site was for mixed use intensification of the existing industrial site, the site was scored a (+). Those sites with proposed uses not involving the intensification of existing industrial floorspace were scored (-), given the potential for net loss of industrial floorspace.

Sites located adjacent to designated industrial sites were considered in relation to the agent of change principle. The agent of change principle places the burden of mitigation upon the development which changes current circumstances. In the case of designated industrial sites current circumstances include not only current industrial occupiers and their operations but the future capacity of the site to accommodate any conforming industrial use. This means that development of sensitive uses such as housing in proximity to designated sites must be future-proofed against potential future industrial uses on the designated site. Sites located adjacent to designated industrial sites with proposed uses not solely industrial were scored (0) as mitigation may be required.

³² Source: GLA London Datastore (2021) https://data.london.gov.uk/dataset/locally_significant_industrial_sites?q=lsis

³³ Source: GLA London Datastore (2021) https://data.london.gov.uk/dataset/strategic_industrial_land

Information available following Regulation 18 consultation

A further qualitative assessment will be undertaken based on a more detailed understanding of the site's development potential (in terms of uses and capacity) to re-assess impact on designated and non-designated industrial sites.

For example, where it can be demonstrated that the site would likely result in no net loss, or a net increase (intensification) of industrial floorspace, the site could be scored a (+) as would be considered to be compliant with emerging industrial policy.

The assessment will have regard to conforming uses – i.e. with the following operational requirements, within the London Plan (Policy E4):

- light and general industry (Use Classes B1c and B2)
- storage and logistics/distribution (Use Class B8) including 'last mile' distribution close to central London and the Northern Isle of Dogs, consolidation centres and collection points
- secondary materials, waste management and aggregates
- utilities infrastructure (such as energy and water)
- land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure
- wholesale markets
- emerging industrial-related sectors
- flexible (B1c/B2/B8) hybrid space to accommodate services that support the wider London economy and population
- low-cost industrial and related space for micro, small and medium-sized enterprises (see also Policy E2 Providing suitable business space)
- research and development of industrial and related products or processes (falling within Use Class B1b).

It is noted that the use classes specified within the London Plan are no longer accurate following amendments to the Town and Country Planning (Use Classes) Order 1987 in September 2020. With this in mind, the assessment regards the use itself rather than the specified use class.

C.1.11 Local Plan spatial development pattern

(+)	0	(-)
Site has potential to significantly contribute to the Plan's spatial development pattern	Site has potential to contribute to the Plan's spatial development pattern	Site may have limited contribution/ weaken the Plan's spatial development pattern

This assessment was undertaken by Arup. The data for the assessment was from a range of sources including from Ealing Council (town centre boundaries from the current Local

Plan as well as emerging policies in the Regulation 18 Local Plan), London Datastore (Opportunity Areas³⁴, PTAL³⁵ Strategic Areas for Regeneration³⁶) and aerial imagery.

Quantitative Assessment

Using GIS, each site was reviewed in relation to focus areas as identified within the Regulation 18 Local Plan, which defines good growth as being primarily focused in:

- Town centres (from neighbourhood centre to metropolitan centre)³⁷. Emerging neighbourhood centres within the Regulation 18 Local Plan (including draft Policy P.4: Perivale Station and environs and draft Policy N.3: White Hart Neighbourhood Centre) were also considered;
- Around places of existing high Public Transport Accessibility Levels (PTAL)³⁸;
- Municipal housing estates (regeneration-focussed)³⁹;
- As part of mixed-use intensification of industrial sites⁴⁰;
- Within opportunity areas⁴¹;
- Within strategic areas for regeneration⁴².

Qualitative Assessment

Where a site met none of the criteria, it was scored (-). Where a site met one or two criteria, it was scored 0. Where a site met three or more criteria, it was scored (+).

Information available following Regulation 18 consultation

A further qualitative assessment will be undertaken based on a more detailed understanding of the site's development potential (in terms of uses and capacity) to re-assess alignment with the Regulation 18 Local Plan spatial development pattern.

C.1.12 Accessibility – PTAL

(+)	0	(-)
Site is located in an area of good accessibility to public transport (PTAL (4 – 6a/b)	Site is located in an area of fair accessibility to public transport (PTAL (2- 3)	Site is located in an area of poor accessibility to public transport (PTAL (0 – 1a/1b)

³⁴ Source: GLA London Datastore (2022): https://data.london.gov.uk/dataset/opportunity_areas

³⁵ Source: GLA London Datastore (2015): <https://data.london.gov.uk/dataset/public-transport-accessibility-levels>

³⁶ Source: GLA London Datastore (2019): <https://data.london.gov.uk/dataset/indices-of-deprivation>. Refer to footnote 42.

³⁷ As per Ealing Local Plan and the London Plan (2021) town centre classification (Annex 1).

³⁸ The Regulation 18 Local Plan spatial development pattern also refers to areas of high potential PTAL, which should be reviewed for sites at the Regulation 19 stage.

³⁹ Where sites include existing housing estates, it was assumed that their development could contribute to local regeneration.

⁴⁰ Where sites include existing industrial land (either designated or non-designated) and have potential for mixed-use intensification.

⁴¹ As per the London Plan (2021) Policy SD1 Opportunity Areas

⁴² As per the London Plan (2021) definition, strategic areas for regeneration are those LSOAs that fall within the top two most deprived deciles of the English Indices of Deprivation (2019).

This assessment was undertaken by Arup. The data was sourced from TfL through the London Data Store⁴³.

It is noted that PTAL has been partially assessed under 'Local Plan spatial development pattern' criterion. Given the importance of PTAL in determining site suitability, it is considered appropriate to assess this criterion as a separate category.

Quantitative Assessment

Through GIS, the PTAL was determined for each site. For sites straddling multiple PTAL areas professional judgement was applied to assign a score based on site coverage and justification was provided.

C.1.13 Vehicular access to the site

(+)	0	(-)
Suitable access to the site already exists	Access to the site can likely be created within landholding adjacent to the highway; or Potential for access to the site to be created through third party land and agreement in place, or existing access would require upgrade.	Achieving access to the site is likely to be difficult and/or existing infrastructure would likely require wider works/major restructuring.

This assessment was undertaken by Arup specialists, using aerial imagery and highway network GIS data provided by Ealing Council.

Qualitative Assessment

Information available prior to Regulation 18 consultation

Professional judgement was used to determine whether there was suitable access to the site, and whether there was potential to improve connectivity into the site.

Information available following Regulation 18 consultation

A further detailed qualitative assessment will be undertaken once further information is available to re-assess the vehicular site access points.

⁴³ Sites boundaries have been assessed in GIS using PTAL contour files (2015). The PTAL values have therefore not been taken from TfL's WebCAT tool which is in a tile format and would require manual assessment of sites. Further discussions will be held with TfL regarding use of PTAL data in next stages of assessment.

C.1.14 Impact on provision of open space

(+)	0	(-)
The development could reasonably provide an opportunity to improve links to adjacent existing public open space or provide access to open space which is currently private.	<p>The development is unlikely to involve the loss of any open space; or</p> <p>The development may involve the loss of open space but there are opportunities for on-site offsetting or mitigation.</p>	The development may involve the loss of open space with limited opportunities for on-site or off-setting or mitigation.

This assessment was undertaken by Arup specialists. The data for the assessment was sourced from Greenspace information for Greater London CIC (GiGL)⁴⁴.

Quantitative Assessment

Information available prior to Regulation 18 consultation

This assessment used GIS data to identify the presence of existing open spaces within the site, including all categories of open space as defined with the GiGL⁴⁵ data:

- Parks and Gardens;
- Natural and Semi-Natural Urban Greenspaces;
- Green Corridors (note. these include rivers, canals, railways cuttings, railway embankments, and walking / cycling routes);
- Outdoor Sports Facilities;
- Amenity;
- Children and Teenager Spaces;
- Allotments, Community Gardens and City Farms;
- Cemeteries and Churchyards;
- Other Urban Fringe;
- Civic Spaces;
- Other (note. includes vacant land, and sewage / water works etc.).

For sites including existing open spaces, the assessment considered the extent to which open space might be lost as a result of proposed development. This considered the scale of the overlap between the site and the open space, as well as the location of the open space relative to the wider site. If it was judged likely that open space would be lost, the ability to mitigate this or the potential for on-site provision was considered.

The accessibility of existing open spaces (i.e. public or private) within sites was also considered using GiGL data which categorises open space accordingly:

⁴⁴ Source: GiGL data is available from the GLA London Datastore (2022) <https://data.london.gov.uk/publisher/gigl>

⁴⁵ The data classifies open space through the previous PPG17 categories and sub-categories

Qualitative Assessment

Information available following Regulation 18 consultation

A further qualitative assessment will be undertaken to consider potential opportunities to improve access to existing adjacent public open spaces, provide access to open space which is currently private or provide new areas open space which might be of benefit to the wider community. Where a site overlaps with existing open space potential mitigation will be re-considered within site proposals.

C.1.15 Access to open space

(+)	0	(-)
Site is not located within an area of deficiency in access to small / local / pocket or district or metropolitan or regional parks; or There are proposals for new on-site open space provision as part of the development.	N/A	Site is located within an area of deficiency in access to small / local / pocket or district or metropolitan or regional parks.

This assessment was undertaken by Arup specialists. The data for the assessment was sourced from Greenspace Information for Greater London CIC (GiGL) ⁴⁶.

Quantitative Assessment

Information available prior to Regulation 18 consultation

This criterion was assessed quantitatively, using GIS data to identify whether the site is located within an area of deficiency in access to small / local / pocket, district, metropolitan, and/or regional parks. To assess this criteria, Greenspace Information for Greater London CIC (GiGL) data was used, which classifies areas of deficiency as areas outside of the maximum distance in which London residents should have to travel to access different types of parks. Sites were scored a (+) where there were no areas of identified deficiency or a (-) if there was deficiency in access to one or more type of parks identified.

Qualitative Assessment

Information available following Regulation 18 consultation

A further qualitative assessment will be undertaken to identify where new on-site public open space may be proposed by developers as part of future site proposals.

⁴⁶ Available at: the GLA London Datastore (2022) <https://data.london.gov.uk/publisher/gigl>

C.1.16 Distance to Nearest Primary School

(+)	0	(-)
Site is less than 1000m from the nearest infant/primary school	Site is between 1000m and 4000m from the nearest infant/primary school	Site is more than 4000m from the nearest infant/primary school

This assessment was undertaken by Arup specialists. The data for the assessment was sourced from Ealing Council and included schools both within Ealing and surrounding boroughs.

Information available prior to Regulation 18 consultation

This assessment was limited to consideration of distances to primary schools. There was insufficient data available at this stage to assess availability of school places.

Quantitative Assessment

The assessment used GIS data to identify the site's distance from a primary school. Sites within the 1000m buffer were automatically scored as (+), sites outside the 1000m buffer but within the 4000m buffer were scored (0), and sites outside of the 4000m buffer were scored (-).

Buffer areas for each school were calculated using isochrones, giving an accurate measurement of travel distance according to the road networks rather than 'as the crow flies'. Due to the urban context of the majority of the subject area, the vast majority of sites were likely to be scored positively. Only state schools were included in this assessment.

Distances were derived in consultation with Ealing Council officers and through consideration of the Department for Education guidance for statutory walking distances to schools.

Information available following Regulation 18 consultation

A further quantitative assessment will be undertaken to consider the capacity of primary schools.

C.1.17 Distance to Nearest Secondary School

(+)	0	(-)
Site is less than 2000m from the nearest secondary school	Site is between 2000m and 5000m from the nearest secondary school	Site is more than 5000m from the nearest secondary school

This assessment was undertaken by Arup specialists. The data for the assessment was sourced from Ealing Council and included schools both within Ealing and surrounding boroughs.

Information available prior to Regulation 18 consultation

This assessment was limited to consideration of distances to secondary schools. There was insufficient data available at this stage to assess availability of school places.

Quantitative Assessment

The assessment used GIS data to identify the site's distance from a secondary school. Sites within the 2000m buffer were automatically scored as (+), sites outside the 2000m buffer but within the 5000m buffer were scored (0), and sites outside of the 5000m buffer were scored (-).

Buffer areas for each school were calculated using isochrones, giving an accurate measurement of travel distance according to the road networks rather than 'as the crow flies'. Due to the urban context of the majority of the subject area, the vast majority of sites were likely to be scored positively. Only state schools were included in this assessment.

Distances were derived in consultation with Ealing Council officers and through consideration of the Department for Education guidance for statutory walking distances to schools.

Information available following Regulation 18 consultation

A further quantitative assessment will be undertaken to consider the capacity of primary schools.

C.1.18 Distance to Nearest GP Surgery

(+)	0	(-)
Site is less than 1000m from the nearest GP surgery	Site is between 1000m and 4000m from the nearest GP surgery	Site is more than 4000m from the nearest GP surgery

This assessment was undertaken by Arup specialists. The data for the assessment was sourced from Ealing Council and included GP surgeries within the borough and those in surrounding boroughs within proximity to Ealing's boundary.

Information available prior to Regulation 18 consultation

This assessment was limited to consideration of distances GP surgeries. There was insufficient data available at this stage to assess capacity of these surgeries to take on new patients.

Quantitative Assessment

The quantitative assessment for this criterion used GIS data to identify the site's distance from a GP surgery. Sites within the 1000m buffer were automatically scored as (+), sites outside the 1000m buffer but within the 4000m buffer were scored (0), and sites outside of the 4000m buffer were scored (-).

Buffer areas for each GP surgery were calculated using isochrones, giving an accurate measurement of travel distance according to the road networks rather than 'as the crow flies'. Due to the urban context of the majority of the subject area, the vast majority of sites were assessed positively.

Distances were determined in consultation with Ealing Council officers.

Information available following Regulation 18 consultation

A further quantitative assessment will be undertaken to consider the capacity of GP surgeries.

C.2 Additional Suitability Assessment for Regulation 19 Consultation

This criterion assessment has not been undertaken at this stage but will be completed as part of the updates to the SSM supporting the Proposed Submission Local Plan (Regulation 19).

Additional Suitability Criteria
Impact on Green Belt or Metropolitan Open Land

C.2.1 Impact on Green Belt or MOL

(+)	0	(-)
Site is not located within the Green Belt / MOL; or Site provides opportunities to assist in the active use of Green Belt / MOL without any loss	Site is within Green Belt/MOL, but the Green Belt and MOL Review recommended site could be suitable for release.	Site is located within Green Belt/MOL. The Green Belt/MOL Review recommended site would not be suitable for release.

Quantitative Assessment

This assessment will identify whether sites fall within either the Green Belt or MOL network, using GIS data.

Qualitative Assessment

It is anticipated that the qualitative assessment for this criterion will rely upon on the findings of the Council's Green Belt and Metropolitan Open Land Review (Stages 1 - 3)⁴⁷. The results of the Green Belt / MOL review will conclude how well each assessment parcel is performing against the purposes, and therefore whether any land parcels could be recommended for release. The preferred sites layer will be overlaid with the Green Belt/ MOL assessment parcels and the conclusions of this review used to inform the scoring.

⁴⁷ Stage 1 report has been completed to date. Stage 2 and 3 reports to be completed after Regulation 18 consultation

C.3 Deliverability Assessments for Regulation 18

The PPG on Housing and Economic Availability Assessment (HELAA) (Paragraph 019, Reference ID 3-019-20190722) states that a site can be considered available for development, when, on the best information available (confirmed by the Call for Sites and information from landowners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. The PPG also states that the existence of planning permission can be a good indication of the availability of sites, but that sites meeting the definition of deliverable should be considered available unless evidence indicates otherwise. Consideration can be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions.

Sections C.3.1 and C.3.2 set out each criterion as well as the approach to scoring the sites, however in summary, the deliverability assessments at Regulation 18 stage comprised:

Deliverability Criteria
Availability
Safeguarded alternative uses
On-site restrictions

C.3.1 Safeguarded alternative uses

(+)	0	(-)
Not within a consultation zone for safeguarded alternative uses.	Fully or partially within a consultation zone for safeguarded alternative uses.	N/A

This assessment was undertaken by Arup specialists. The data for the assessment was sourced from Ealing Council.

Quantitative Assessment

The assessment used GIS data to identify the presence of any safeguarded alternative uses within the site boundary. These included:

- Heathrow Safeguarding
- Thames Tunnel Safeguarding
- HS2 Sub Surface Safeguarding
- HS2 Surface Safeguarding
- Crossrail Safeguarding

Sites with no constraints were automatically scored a (+).

Sites fully or partially overlapping with a constraint layer were as scored (0) as further consultation would be required with the relevant consultee to determine whether development would be impacted.

C.3.2 On-site restrictions

(+)	0	(-)
Site is not subject to any known restrictions	Site is subject to restrictions and negotiation / consultation may be required.	N/A

This assessment was undertaken by Arup specialists. The data used in the assessment was sourced from Ealing Council.

Quantitative Assessment

The assessment used GIS data to identify the presence of any on-site restrictions within the site boundary. These included:

- TfL Tube Line 10m Buffer
- London Underground Zone of Interest
- Public Rights Of Way

Sites with no constraints were automatically scored a (+).

Sites fully or partially overlapping with a constraint layer were as scored (0) as negotiation/consultation would be required to determine whether development would be impacted.

C.4 Additional Deliverability Assessments for Regulation 19 Consultation

These criterion assessments have not been undertaken at this stage but will be completed as part of the updates to the SSM supporting the Proposed Submission Local Plan (Regulation 19).

Additional Deliverability Criteria
<i>Availability</i>
Ownership
Existing use(s)
Planning status
Availability within plan period and readiness of site for development
<i>Achievability</i>
Site marketability
Viability considerations
On-site physical infrastructure constraints

C.4.1 Ownership

(+)	0	(-)
Site is in single ownership.	Site is in multiple ownership where landowners are promoting independent schemes that are not in conflict, or working collaboratively on a scheme, and there is an agreement in place between the parties.	Site ownership is unknown or is in multiple ownership and the other owners are either unknown, oppose the development or are promoting another conflicting scheme.

Qualitative Assessment

Information available following Regulation 18 consultation

It is anticipated that information provided in the land promoter / developer surveys, Regulation 18 consultation and Call for Sites submissions will primarily be used to inform this assessment.

If site ownership details are unknown a score of (-) will be assigned.

C.4.2 Existing use(s)

(+)	0	(-)
Site is vacant and/or has existing use that is surplus to requirements.	Site is in active use but could be reprovided as part of development.	Site is in current active use which may need to be relocated (e.g. business or community use includes recreational open space).

Quantitative Assessment

It is anticipated that information provided in the land promoter / developer surveys, Regulation 18 consultation and Call for Sites submissions will primarily be used to inform this assessment.

For other sites, desk-based research may be required to establish current on-site land uses, drawing on aerial photography, Council records and planning history. In these cases based on the identified land use, an element of professional judgement will be required to determine whether the site would or would not be available during the plan period, or whether the timescale for uses to cease was unknown.

C.4.3 Planning status

(+)	0	(-)
Known developer interest in bringing the site forward	Imminent, live or granted planning application; or existing preapplication advice identifying a clear vision for whole or part of the site; or expired consent; or no relevant planning history.	Whole or part of the site is already under construction.

Quantitative Assessment

It is anticipated that GIS analysis could be used to flag relevant planning history for the preferred sites, based on the planning history GIS address points overlaid with the preferred site polygons.

Qualitative Assessment

Given the extensive planning history relating to the preferred sites, it will be necessary to review the data export to identify the most relevant planning history, including:

- Identifying the most relevant application/ pre-application information for the purposes of this site selection exercise, using knowledge of the sites' planning history;
- For all relevant applications, comparing the application boundaries and preferred site boundaries to understand whether there is a full or partial overlap (so it is clear whether the planning history relates to all or only part of the site);
- Extracting information on the existing on-site uses and proposed on-site uses (including quantum and mix of uses and whether the uses are active); and
- Recording which sites may be wholly or partially under construction.

It is anticipated that the above will be supplemented with additional information provided in the land promoter / developer surveys, Regulation 18 consultation and Call for Sites submissions.

C.4.4 Availability within plan period and readiness of site for development

(+)	0	(-)
Site is expected to be available within 0-5 years.	Site is expected to be available in 6-15 years.	Site will not be available within the plan period.

Qualitative Assessment

As outlined in the PPG (Paragraph: 019 Reference ID: 3-019-20190722), "a site can be considered available for development, when, on the best information available (confirmed by the Call for Sites and information from landowners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available."

The PPG continues that “the existence of planning permission can be a good indication of the availability of sites. Sites meeting the definition of deliverable should be considered available unless evidence indicates otherwise. Sites without permission can be considered available within the first five years, further guidance on this is contained in the 5 year housing land supply guidance. Consideration can also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions”.

Taking into account the above, it is anticipated that scoring will primarily be undertaken based on responses in the land promoter / developer surveys, Regulation 18 consultation and Call for Sites submissions. Where this information is not available, the following assumptions will be adopted:

- It will be assumed for all sites where pre-application enquiries had been received by the Council or where planning applications had been submitted that the site is likely to be available immediately and a score of (+) will be assigned, with this judgement stated in the assessment;
- Otherwise, it will be assumed for the purposes of this assessment that site availability was unknown and a score of (-) will be assigned accordingly.

C.4.5 Site marketability

(+)	0	(-)
Site is under option to a developer	Site is being actively marketed for development or enquiries have been received from a developer	Site is not being actively marketed

Qualitative Assessment

The scoring will be undertaken with reference to responses provided in the land promoter / developer surveys, Regulation 18 consultation and Call for Sites submissions in the first instance.

Where this information is not available, the following assumptions will be adopted:

- It will be assumed for all sites where pre-application enquiries had been received by the Council or where planning applications had been submitted that the site is being actively marketed and a score of 0 will be assigned. This is assumed given these sites are being actively promoted for development through the planning process;
- Otherwise, it will be assumed that the site has not been marketed for development and a score of (-) will be assigned.

C.4.6 Viability considerations

(+)	0	(-)
No viability issues known to developers / landowners	Potential viability constraints based on professional knowledge and engagement with developers; or viability constraints unknown through lack of evidence	Significant viability constraints

Qualitative Assessment

The PPG (Paragraph: 003 Reference ID: 10-003-20180724) states that “Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Plan makers can use site typologies to determine viability at the plan making stage. Assessment of samples of sites may be helpful to support evidence. In some circumstances more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies”.

This criterion will be assessed using information provided in the land promoter / developer surveys, Regulation 18 consultation and Call for Sites submissions in the first instance. Where relevant site-specific responses are not received, reference will be made to viability testing undertaken by the Council.

C.4.7 On-site physical infrastructure constraints

(+)	0	(-)
There are no known on-site constraints which would impact upon deliverability	On-site constraints have been identified but mitigation or design solutions mean that any impact can likely be managed or mitigated.	Identified on-site constraints may impact upon deliverability

Qualitative Assessment

The assessment will consider whether there are any known on-site physical or infrastructure constraints and the extent to which these might impact upon the deliverability of development.

It is anticipated that reference will be made to the suitability assessments relating to flood risk, access, and contamination and bolstered using information provided in the land promoter / developer surveys on the following constraints:

- Flood risk / drainage;
- Contamination;
- Topography;
- Mains water supply;
- Mains sewerage;
- Electricity supply;

- Gas supply;
- Highways provision and / or capacity;
- Telecoms; and
- Other.

Where a constraint is identified, respondents will be asked to identify how this would be mitigated. Scores will be awarded on the basis of the identification of mitigation measures, or sufficient demonstration that identified constraints will not impact upon deliverability (for example, in cases where there were no existing utilities connections but where nearby grid supplies were available). An element of professional judgement will determine the final score.

Where promoter responses are not received, reference will be made to the information from other sources including the Infrastructure Delivery Plan. Where no information is available from either the survey or other sources, sites may be assigned a score of (+), as no constraint are identified.

Appendix D: Suitability, Availability and Achievability Matrix

D.1 Suitability Matrix

Criteria	Score		
	(+)	0	(-)
Flooding - fluvial / tidal and surface water	Site is located within flood zone 1.	Site is located within flood zone 2.	Site is located within flood zone 3a/b (fluvial or tidal) and/or, 3a (surface water).
Heritage	<p>Site could enhance the significance of the heritage asset or designation/ further reveal its significance/ enhance the setting; or</p> <p>Site is not likely to affect heritage designations/ assets due to their distance from the site.</p>	Site is located within a Conservation Area/ its setting or contains/ is within the setting of a heritage asset and its likely effects can be mitigated.	<p>Site is located within a Conservation Area/ its setting or contains/ is within the setting of a heritage asset and its unlikely effects can be mitigated; or</p> <p>Proposals would likely result in the loss of a heritage asset.</p>
Air quality	<p>Site/ surrounding area is not located within an area which exceeds the following limits:</p> <ul style="list-style-type: none"> - PM10 30µg/m3 - NO2 30µg/m3 	<p>Part of the site/ surrounding area is located within an area which exceeds the following limits, and mitigation would be required:</p> <ul style="list-style-type: none"> - PM10 30µg/m3 - NO2 30µg/m3 	<p>Site is located within an area which exceeds the following limits, and mitigation would be required:</p> <ul style="list-style-type: none"> - PM10 30µg/m3 - NO2 30µg/m3

Criteria	Score		
	(+)	0	(-)
Health and safety	Not within a specified consultation zone of a constraint with health and safety considerations.	Fully or partially within a specified consultation zone of a constraint with health and safety considerations.	N/A
Biodiversity	<p>SINC/ green corridor/ priority habitat/ancient woodland is retained and there are opportunities to enhance existing features; or</p> <p>There is no overlap between the site and/or the site is not likely to affect SINC/ green corridor/ priority habitat/ ancient woodland due to distance from the site.</p>	Site is likely to have limited indirect or no effect on SINC/ green corridor/ priority habitat/ ancient woodland as features could likely be retained, or effects mitigated.	Site overlaps or is adjacent to SINC / green corridor/ priority habitat/ ancient woodland and will likely result in the partial or complete loss of the feature. Therefore it is unlikely effects of the development can be satisfactorily mitigated.
Geodiversity	There is no overlap between the site and/or the site is not likely to affect regionally important geological site due to its distance from the site.	Site is likely to have limited indirect or no effect on regionally important geological site as features could likely be retained, or effects can likely be fully mitigated.	Site overlaps or is adjacent to regionally important geological site and will likely result in the partial or complete loss of the feature. Therefore it is unlikely the effects of the development can be satisfactorily mitigated.

Criteria	Score		
	(+)	0	(-)
Tree Preservation Order	<p>The intensity of site development would unlikely be constrained by the presence of protected trees either on or directly adjacent to the site; or</p> <p>Site has no effect due to distance from TPO(s).</p>	<p>The intensity of site development would likely be constrained by the presence of protected trees either on or directly adjacent to the site</p>	<p>The site likely has severely limited feasibility for development as a result of the extensive presence of protected trees, either on or directly adjacent to the site. There is likely to be limited opportunity to offer suitable mitigation through redesign.</p>
Brownfield vs Greenfield Land	Majority/ all of the site is previously developed land	N/A	Majority/ all of the site is greenfield land
Contamination	No contamination issues identified on site to date.	Potential contamination on site, which could be mitigated.	Potential severe contamination on site, where assurances would have to be sought from the developer that remediation would not harm site viability.
Employment – industrial designated and non-designated land	<p>Not within a designated or non-designated industrial area; or</p> <p>Site is within a designated or non-designated industrial area and given the proposed use is unlikely to result in net loss / may result in net increase of industrial floorspace (through mixed use intensification).</p>	<p>Site is adjacent to a designated industrial site and mitigation may be required to ensure no negative impacts on current industrial occupiers and their operations or the future capacity of the industrial site to accommodate any conforming industrial use.</p>	<p>Given the proposed use, site may result in a net loss of designated or non-designated industrial floorspace.</p>

Criteria	Score		
	(+)	0	(-)
Local Plan spatial development pattern	Site has potential to significantly contribute to the Plan's spatial development pattern	Site has potential to contribute to the Plan's spatial development pattern	Site may have limited contribution/ weaken the Plan's spatial development pattern
Accessibility - PTAL	Site is located in an area of good accessibility to public transport (PTAL (4 – 6a/b)	Site is located in an area of fair accessibility to public transport (PTAL (2- 3)	Site is located in an area of poor accessibility to public transport (PTAL (0 – 1a/1b)
Vehicular access to the site	Suitable access to the site already exists	Access to the site can likely be created within landholding adjacent to the highway; or Potential for access to the site to be created through third party land and agreement in place, or existing access would require upgrade.	Achieving access to the site is likely to be difficult and/or existing infrastructure would likely require wider works/major restructuring.
Impact on provision of open space	The development could reasonably provide an opportunity to improve links to adjacent existing public open space or provide access to open space which is currently private.	The development is unlikely to involve the loss of any open space; or The development may involve the loss of open space but there are opportunities for on-site offsetting or mitigation.	The development may involve the loss of open space with limited opportunities for on-site or off-setting or mitigation.

Criteria	Score		
	(+)	0	(-)
Access to open space	<p>Site is not located within an area of deficiency in access to small / local / pocket or district or metropolitan or regional parks; or</p> <p>There are proposals for new on-site open space provision as part of the development.</p>	N/A	Site is located within an area of deficiency in access to small / local / pocket or district or metropolitan or regional parks.
Distance to nearest primary school	Site is less than 1000m from the nearest infant/primary school	Site is between 1000m and 4000m from the nearest infant/primary school	Site is more than 4000m from the nearest infant/primary school
Distance to nearest secondary school	Site is less than 2000m from the nearest secondary school	Site is between 2000m and 5000m from the nearest secondary school	Site is more than 5000m from the nearest secondary school
Distance to nearest GP surgery	Site is less than 1000m from the nearest GP surgery	Site is between 1000m and 4000m from the nearest GP surgery	Site is more than 4000m from the nearest GP surgery
Impact on Green Belt or MOL	<p>Site is not located within the Green Belt / MOL; or</p> <p>Site provides opportunities to assist in the active use of Green Belt / MOL without any loss</p>	Site is within Green Belt/MOL, but the Green Belt and MOL Review recommended site could be suitable for release.	Site is located within Green Belt/MOL. The Green Belt/MOL Review recommended site would not be suitable for release.

D.2 Availability Matrix

Criteria	Score		
	(+)	0	(-)
Safeguard alternative uses	Not within a consultation zone for safeguarded alternative uses.	Fully or partially within a consultation zone for safeguarded alternative uses.	N/A
On-site restrictions	Site is not subject to any known restrictions	Site is subject to restrictions and negotiation / consultation may be required.	N/A
Ownership	Site is in single ownership.	Site is in multiple ownership where landowners are promoting independent schemes that are not in conflict, or working collaboratively on a scheme, and there is an agreement in place between the parties.	Site ownership is unknown or is in multiple ownership and the other owners are either unknown, oppose the development or are promoting another conflicting scheme.
Existing use(s)	Site is vacant and/or has existing use that is surplus to requirements.	Site is in active use but could be reprovided as part of development.	Site is in current active use which may need to be relocated (e.g. business or community use includes recreational open space).

Criteria	Score		
	(+)	0	(-)
Planning status	Known developer interest in bringing the site forward	Imminent, live or granted planning application; or existing preapplication advice identifying a clear vision for whole or part of the site; or expired consent; or no relevant planning history.	Whole or part of the site is already under construction.
Availability within plan period and readiness of site for development	Site is expected to be available within 0-5 years.	Site is expected to be available in 6-15 years.	Site will not be available within the plan period.

D.3 Achievability Matrix

Criteria	Score		
	(+)	0	(-)
Site marketability	Site is under option to a developer	Site is being actively marketed for development or enquiries have been received from a developer	Site is not being actively marketed
Viability considerations	No viability issues known to developers / landowners	Potential viability constraints based on professional knowledge and engagement with developers; or Viability constraints unknown through lack of evidence	Significant viability constraints
On-site physical infrastructure constraints	There are no known on-site constraints which would impact upon deliverability	On-site constraints have been identified but mitigation or design solutions mean that any impact can likely be managed or mitigated.	Identified on-site constraints may impact upon deliverability

Appendix E: Results of the Suitability and Deliverability Assessment for Regulation 18

See separate document