

MYTH

BUSTER

QUESTIONS ON THE LOCAL PLAN ANSWERED



**SHAPING
EALING**



Your
Local Plan



The Local Plan and Regulation 19

What is the Local Plan/ Regulation 19?

The new Local Plan for Ealing sets the framework for development in the borough and will guide planning decisions about homes, infrastructure, climate change, jobs, and how we can address health and inequalities in the borough in the near future.

It also shows what needs to be protected, conserved or enhanced such as green spaces, canals, heritage assets, shopping areas and employment space. It guides future development and covers a period of 15 years.

Key highlights of this plan are a fairer and more balanced approach to growth, in which all seven of the borough's towns have a role and will

benefit from investment and development and employment opportunities and spaces, the promotion of active travel, clarity on where 'tall buildings' are considered to be suitable and delivering more affordable housing, including a greater focus on social rent. In addition it focuses on a clear understanding of the range of infrastructure, including social infrastructure and open space needed to support this growth. At its heart, this plan is about creating places and neighbourhoods where people can thrive.

Regulation 19 is the latest version of this Local Plan and it builds upon the Regulation 18 version, which we consulted on widely last year through a series of successful in-person and online surveys, events and meetings. We have updated

this latest iteration of the plan to reflect the feedback we received last year.

This consultation is now more technically focused than Regulation 18, so we are asking if the latest plan meets the legal requirements and whether it meets tests of 'soundness' – which are is it positively prepared, justified, effective and consistent with national policy.

This document provides answers to some common questions that have been raised during the development of the Local Plan.



Climate action

How are you going to deliver on your aim to tackle the climate crisis?

Climate action is one of three strategic priorities of the Local Plan and underpins a range of policies.

The Local Plan plays a vital role in contributing to our ambition to become net carbon neutral by 2030, both as a council and a borough. This includes:

- delivering 20 minute neighbourhoods together with a wide range of active travel improvements and enhancements to public realm
- ensuring that future development achieves the highest measurable standards of sustainable design and construction
- promoting and supporting the use of new technologies for low and zero carbon energy sources and delivering more EV charging points across the borough
- promoting retrofitting and adaptation of existing buildings to conserve energy, and enhancing building conditions, for example, through high quality thermal and acoustic insulation
- achieving net waste self-sufficiency and supporting the principles of the circular economy
- building resilience, mitigation and adaptation for example by addressing poor air quality, mitigating the threat of flood risk
- encouraging and promoting greater biodiversity and urban greening
- supporting tree planting, woodlands, orchards, hedgerows, and rewilding to promote carbon capture, and to make Ealing more resilient and adaptive to climate change
- promoting community food growing, protecting allotments and leading food partnerships
- maintaining, enhancing and expanding the network of green infrastructure including plans for a new regional park, lido and other sporting, recreational and cultural facilities

Following the Regulation 18 consultation, we have added a whole new suite of policies on climate action in the Local Plan, including policies on operational energy performance, embodied carbon, the whole life cycle carbon approach, reducing waste and supporting the circular economy and promoting local biodiversity improvement and access to nature.

What is a 20 minute Neighbourhood?

A 20 minute neighbourhood is a place where residents are able to access key services within a 20 minute roundtrip walk from their homes.

The 20 minute neighbourhood model is an important part of the Local Plan influencing the direction of future growth and investment. The goal is to create places where residents are able to access key services within a 20 minute roundtrip walk from their homes (for instance a 10 minute walk there and a 10 minute walk back). It also ensures improved access to different modes of transport (and reduces dependency on the car) to essential local services, not discriminating against an individual's budget or physical ability. This model can also be represented as a distance measure and typically a 20 minute journey is considered as

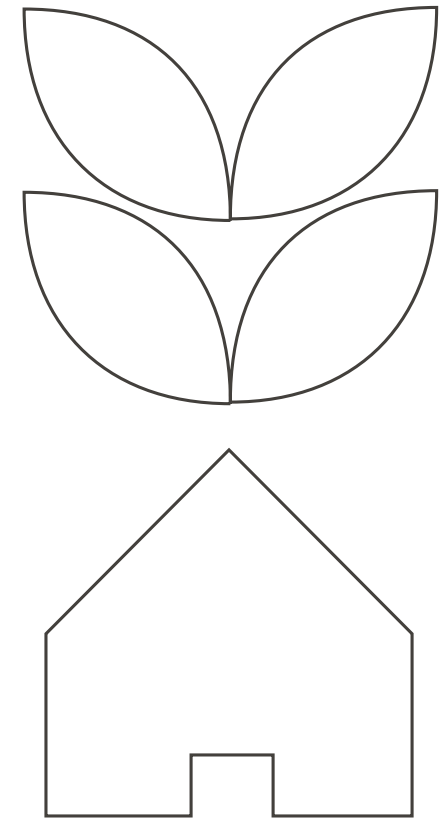
an 800 metre walk from home to destination and back again. Neither the name nor the specified minutes or distance is crucial or are intended to be applied strictly, as the key aim is to create complete and connected places.

Goods and services within a '20 minute neighbourhood' usually include access to public transport, health, education, employment, community, retail, culture, leisure and green spaces.

This plan aims to give people more choice about how they want to access their local community, without a car if they want or need to. Having more choices can benefit people's physical and mental health and helps to create a stronger sense of community, in addition to boosting the local economy.

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20 minute neighbourhood frameworks were community led and prepared in collaboration with their respective local communities. These studies were taken into consideration for the new Local Plan.





Housing Delivery

Why does Ealing have to Plan for more homes?

The council needs to provide for the needs of residents. Sufficient housing is a key priority not only in our Local Plan, but also the government's national planning policy.

Planning to meet need is a key purpose of the Local Plan. This includes housing and employment needs. According to the government's national planning policy (which we are required to follow) there is a lot of land in Ealing that has the potential for future development that can help meet our identified needs. It is up to the council to plan for this properly, whilst protecting what is most important. If we don't plan for enough housing to meet our housing needs, our Local Plan won't be approved, and we will be vulnerable to unplanned development.

Weren't housing delivery targets abolished?

The Ministerial Statement of 6 December 2022 set out that housing numbers calculated according to the government's standard method should be a starting point for local plans. However, Local Plans are still expected to meet need as far as possible and in London, our housing targets are set by the London Plan.

What is Ealing's housing target?

The London Plan sets out a ten-year housing target for each Local Authority and they must plan to meet that target. For Ealing, this is 21,570 net units to be delivered between 2019 or 2020 and 2028 or 2029.

This equates to 2,157 new homes each year. The figure is based primarily upon how much development is possible

in the borough and is tested at each London Plan review, most recently in 2020.

For affordable housing the London Plan sets a strategic target of 50%. This target is confirmed by Ealing's Local Housing Needs Assessment. Ealing's Inclusive Economy Study also shows us that more affordable houses are essential to ensure good living conditions and decent incomes. Recognising this need, the plan increases the threshold for the fast track route, so that in Ealing it will only apply to schemes providing at least 40% affordable housing, with a focus on social rent.

This overall housing target remains a test for all Local Plan making and is also a material consideration in any individual planning application. A Local Plan that fails to meet this target is unlikely to be found sound by an inspector.

Delivering 2,157 new homes every year is certainly ambitious and will be challenging to meet, but it is significantly less than the housing target based on the government's standard method, which for Ealing is 4,709 net homes per year.

How confident are you that the housing delivery target can be met?

The Council maintains a Housing Trajectory which examines anticipated delivery over the life of the plan measured against this target. Covering a 19 year period up to 31 March 2038, the latest trajectory demonstrates that by the end of the plan period, completions should outstrip the cumulative requirement figure by 6,126 units.

The projections illustrate however that performance may not be consistent throughout this period, particularly when examined on an annual basis. The latest trajectory indicates that annual delivery is expected to fall short of the annual target until at least 2024 or 2025. This position is not unexpected, reflecting the significant step change in the housing target which will take time to turn into completions. The current economic climate has also led to a slowing down of housing development across the country, however, the overall results of this trajectory indicate that projected cumulative delivery should meet the 10 year requirement before the end of the London Plan target period in 2028, or 2029.

The Plan can set the framework for delivering new homes, however actual delivery is not controlled by the local authority.

What about the Housing Delivery Test?

In the first four sets of results out of five, Ealing has comfortably passed the Housing Delivery Test. An action plan is required to address any shortfall in the latest results.

To date the government has published five sets of results, covering the measurement years 2018 to 2022. In the first four sets of results out of five, Ealing has passed the test with no interventions or actions being triggered. The latest results, the 2022 measurement, were published in December 2023. This latest set covers the three-year period from April 2019 to March 2022, comparing the number of homes delivered during this three-year period against the cumulative requirement for the same period.

The results show for the first time that delivery fell short of the requirement accounting for 86% of the target. As a

consequence of this percentage shortfall, Ealing is now required to produce an action plan which will identify the reasons for under delivery and set out the measures the authority will take to improve levels of delivery going forward. Fluctuations in respect of annual performance are not unusual, reflecting economic cycles and the evolving policy context and general build-out timeframes, and as explained above based on the identified future supply evidenced through the trajectory, Ealing is anticipated to pass these tests over the longer term.

So, what happens if we don't have an up-to-date Local Plan?

If we don't have an up-to-date Local Plan that meets our housing needs, we will see more housing and other uses in areas not suitable for development.

This is the result of having outdated Local Plan policies. This means we will get

development but we won't get to plan where it should go and most importantly, we won't get to plan the schools, roads, parks, community sports facilities and shops that people need.



Gypsies and Travellers

What about new sites for gypsies and travellers?

We are currently required by government policy to identify a supply of specific sites to meet the needs of this community within the Local Plan.

How many more pitches are needed?

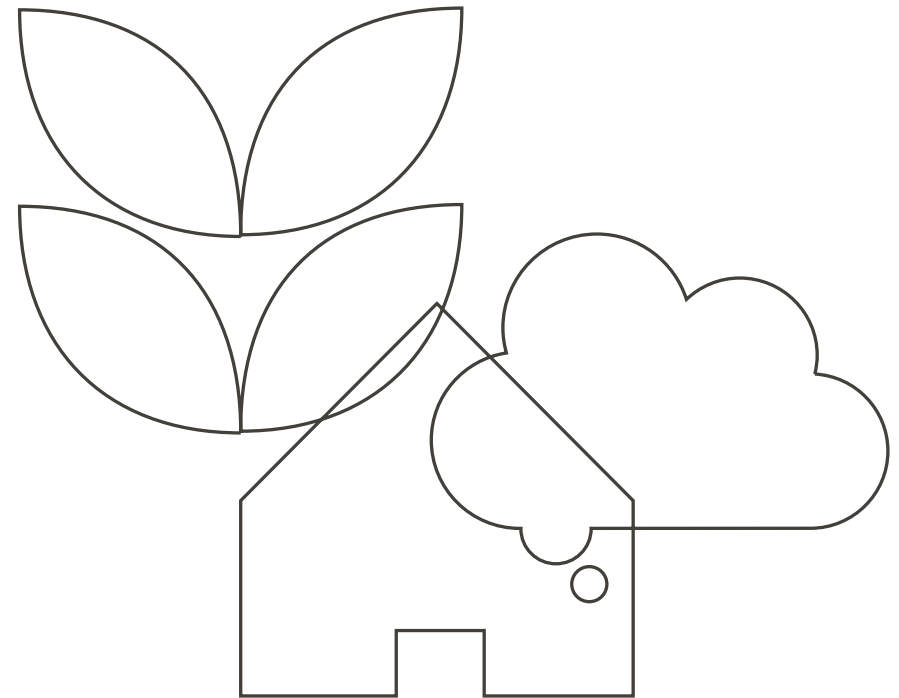
We have identified a need for an additional six pitches for the Gypsy and Traveller community.

We consulted on two main possibilities in July and August 2023. The site proposed in the Regulation 19 Plan is the Kingdom Workshop, Sharvel Lane, Northolt. The current use on the site is an unconsented lorry repair workshop, which is not a compliant Green Belt use. Council officers did consider the possibility of a larger site, but

it was decided that the existing 24 pitches at Bashley Road, Park Royal would be retained so a larger site was not necessary.

Can you expand the existing site at Bashley Road, Park Royal?

This has been explored extensively however there is no scope to expand it.





Green Belt/Metropolitan Open Land/ Green & Open Space

What has happened to the original proposals to amend Green Belt and Metropolitan Open Land (MOL) designations?

We have decided not to proceed with the original proposals due to objections raised, including by the Mayor of London in his Statement of General Conformity.

Instead, Green Belt and MOL boundary changes are proposed only where a site has been identified for development and allocated in this Local Plan. These are a small number of sites (or parts of sites) that do not contribute towards Green Belt/MOL objectives, and which could be used to meet identified development needs and thus are identified for change in designation, demonstrating the corresponding exceptional circumstances. In addition, to ensure defensible boundaries,

some boundary corrections have been made which reflect the current reality and use of sites. Any changes are shown in the [Atlas of Change and the Interactive Policies Map](#).

Are you planning to build on our allotments?

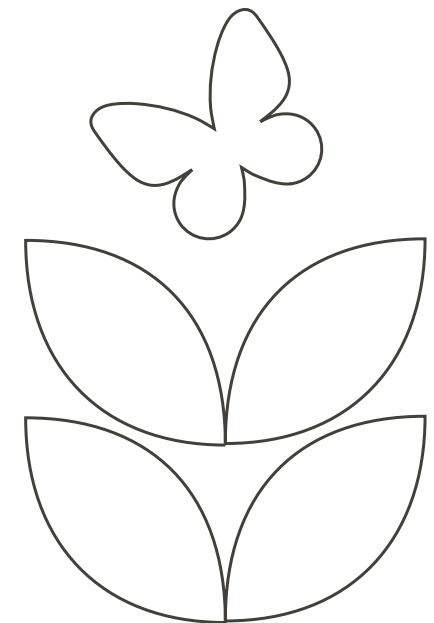
No, the draft new Local Plan does not propose any loss of allotment space.

Allotments are valuable, not just from an environmental perspective, but also in terms of promoting physical and mental health and wellbeing. Allotments have community open space protection from development, which reflects their local importance.

Are you seeking to develop on Warren Farm?

We do not propose introducing new uses on Warren Farm, but to renew the existing sports facilities.

Sports uses have existed on Warren Farm for many decades but were abandoned in recent years. We are proposing to replace these with modern sports facilities that will serve the people of Southall, Hanwell and the surrounding areas. The council appreciates and values Warren Farm's nature, biodiversity and role as an important green space for local people. Our proposals seek to preserve the wild character of Warren Farm as a place for local people to enjoy nature, as well as deliver community sports facilities that we know people need.





Tall Buildings

What is your current position on tall buildings?

The new Local Plan seeks to ensure that tall buildings are only built where they are suitable.

The Local Plan is based on a borough-wide character study and tall buildings are suggested only where they are suitable in terms of function and accessibility and do not cause significant impact to local character.

Infrastructure requirements (such as schools, community centres, roads, water etc) have been assessed to support the sustainable delivery of planned growth over the plan period and are summarised in the Local Plan and set out in more detail in an Infrastructure Delivery Plan.

Social infrastructure (such as schools and community centres) are funded based on

population size and growth, so development will fund more facilities in suitable places.

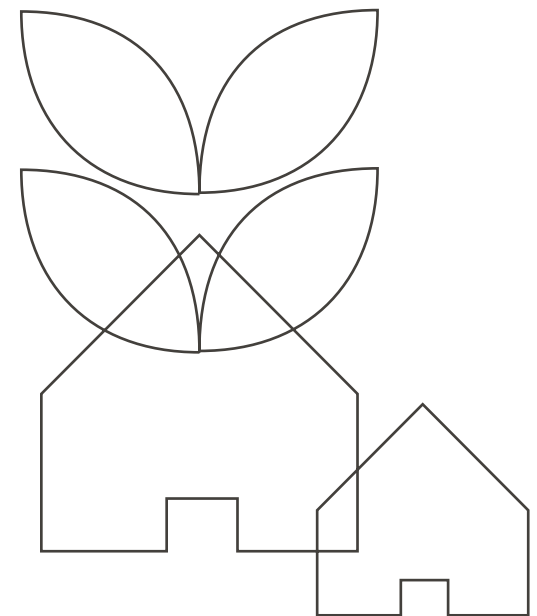
What is the planning criteria for tall buildings?

Proposals for tall buildings are mainly restricted to specified sites and only at particular heights.

The new Local Plan actually proposes significant restrictions on the development of new tall buildings. Of the 82 development sites allocated in the Local Plan, 35 are considered potentially suitable for a taller element.

Of these 23 have a maximum threshold height of 10 storeys or more with almost half of these located in the Ealing metropolitan town centre (11 sites). The remainder are located in Acton (3 sites), Greenford (2 sites), Hanwell (1 site), Northolt (1 site) and Southall (5 sites).

The maximum tall buildings threshold height is simply that and not a presumption that any height up to this is automatically acceptable. Planning law will still require us to consider any application, but the plan makes clear where taller buildings are suitable and where they are not.





Infrastructure and funding

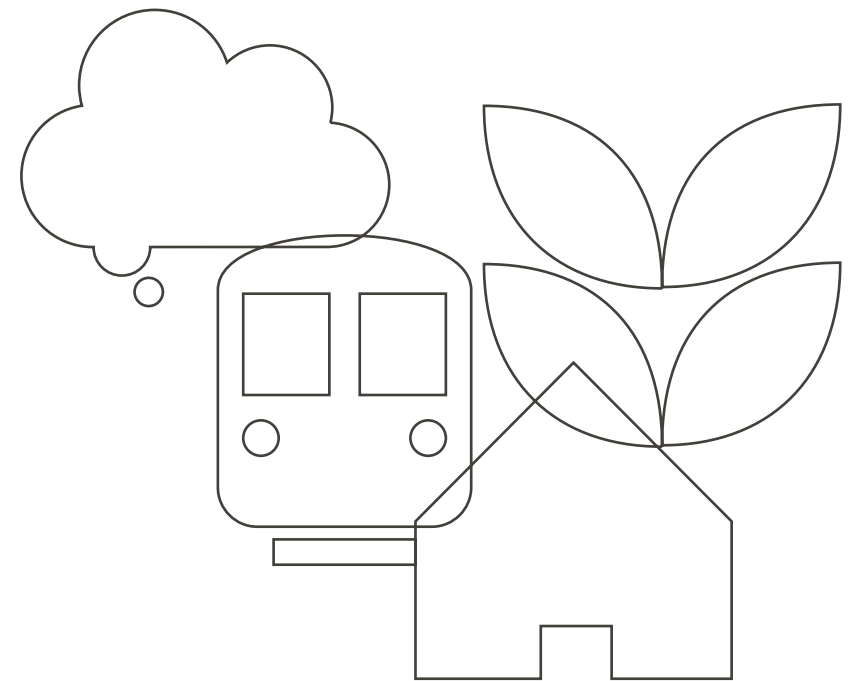
What does the Local plan cover in terms of services such as schools, GPs and transport?

The Local Plan now includes key infrastructure requirements for schools, GP's and transport and alongside the plan we propose introducing a developer tax to help fund those requirements (also known as the Community Infrastructure Levy).

This is backed up by a detailed Infrastructure Delivery Plan, a viability assessment and new proposals for a Community Infrastructure Levy (CIL) Draft Charging Schedule.

CIL is a charge that local authorities can set on new development to raise funds to help pay for the infrastructure needed to support new homes and businesses. It sets different charges for different uses and for residential, in different

areas of the borough, informed by the viability study. Once CIL is adopted it is assumed to be the primary mechanism to raise funds for strategic infrastructure. The council has until now used s106 to raise contributions towards various infrastructure projects, ranging from items directly required as a result of development (such as landscaping or immediate highway improvements) to off-site tariffs. Once CIL is adopted, the s106 process will remain, however its scope will be largely restricted to site specific aspects, with wider infrastructure delivery assumed to be paid for via CIL.





Why is the council focusing on housing?

Ealing has a housing target set out in the London Plan and any Local Plan that fails to meet this will either not be found sound or will be rewritten by an inspector.

The draft plan goes further than any previous plan in Ealing to place other types of development such as mixed-use properties at the heart of future growth. It also specifically addresses the demand for well-paying and high-quality jobs.



What is the Southall Reset?

The Southall Reset Programme is designed to 'reset' the council's approach to development, particularly when creating new jobs and developing new housing in Southall.

The programme was approved by Ealing Council Cabinet in July 2022 to focus on addressing deep-rooted challenges specific to Southall, to support its residents and businesses to become part of a thriving Southall community.

It is based on two key principles:

- creating a fairer balance between new jobs and new homes, ensuring Southall continues to grow into a thriving local economy.

- to collaborate with local residents and businesses to create more opportunities to connect with the council and have a bigger say in the development of Southall.

This programme applies to Southall town centre and its surrounding neighbourhoods located in the wards of Lady Margaret, Dormers Wells, Southall Broadway, Southall West, Southall Green and Norwood Green.



Engagement

Have you engaged sufficiently with local people on the new Local Plan?

Ealing Council has carried out extensive engagement on the Local Plan, including the Shaping Ealing engagement and the consultation on the Regulation 18 version of the plan.

The Shaping Ealing engagement was carried out between November 2021 and May 2022. This was a simple, easy to complete online survey which resulted in 10,661 people taking part. Additionally, a series of community events and conversations were held in various parts of the borough to reach out and engage with those who may not have taken part in the online survey, or are seldom heard, to encourage broad representation.

Following that, Ealing Council went well beyond the statutory

consultation requirements as part of the Regulation 18 Local Plan consultation. This included extending the consultation period to over two months and organising workshops, walking tours, and high street events in each of our seven towns. We received over 13,000 responses in total, which confirms the engagement exercise was very successful. That said, we can always improve our consultations and if you think there could have been a better way to engage our residents and communities on the Local Plan, we welcome your feedback.

What has been done with the feedback received so far?

We have actively listened to feedback from the public and have applied this directly to policies in the new draft Local Plan.

Given the national and regional planning policy framework, the strategic objectives and priorities outlined in the Council Plan 2022 to 2026, and the need to respond to a series of urgent policy matters, developing a Local Plan will always involve a balancing of different priorities. This is reflected in the wide ranging and sometimes conflicting feedback we received.

Some of the most significant changes between the Regulation 18 and this new version of the plan include the following.

In Chapter 3, which deals with the Spatial Strategy, the key changes include:

- strengthening policies around climate action
- making provision for a new circular economy hub to support waste reduction,

the creation of a new Ealing Regional Park and the creation of a new outdoor swimming facility in Ealing

- to not proceed with the original proposals regarding changes to Green Belt and Metropolitan Open Land designations as a consequence of the objections raised, including by the Mayor of London. Instead, Green Belt and MOL boundary changes are proposed only where a site has been identified for development and allocated in this Local Plan, and some boundary corrections have been made which reflect the current reality and use of sites
- clarifying the need to meet an identified future need of six additional pitches for the Gypsy and Traveller community

- setting out borough-wide infrastructure schemes which are necessary to support the planned growth
- clarifying housing delivery targets and the maximisation of affordable housing

In Chapter 4, which deals with Town Plans, the key changes include:

- reconfiguration and strengthening of each of the town spatial strategy policies to include separate headings on spatial vision and the same three strategic objectives that underpin the borough-level spatial strategy: tackling the climate crisis, fighting inequality and creating good jobs and growth
- each town spatial strategy also sets out any key infrastructure delivery priorities for the area and now has an amended spatial strategy diagram

- strengthening policy on the Ealing Metropolitan Town Centre
- adding new policies for the industrial estates in Greenford, Northolt and Perivale
- the addition of an index map showing development sites in each town and indicating those development sites where tall buildings are deemed to be potentially suitable

Regarding the development sites that accompany each town plan there have also been a number of significant changes to the list published at Regulation 19. These changes are also based upon public and stakeholder feedback at Regulation 18 together with a further assessment of site suitability and deliverability. The key points to note are:

- of the 118 sites consulted upon at Regulation 18, 40 have not been carried through into Regulation 19

- 4 entirely new sites have been added arising from the 'call for sites' making a revised total of 82 sites
- 21 sites have had their red line boundaries amended

Each of the 82 development sites now also includes:

- updated proposed uses for the site and an indicative timetable for delivery
- consideration of any relevant contextual circumstances, design principles and key infrastructure requirements to guide any future development proposals
- where appropriate, specific guidance on the suitability of any tall buildings and parameters on scale, height and massing

In chapter 5, which deals with Development Management Policies, the key changes include:

- strengthening the policy on affordable housing
- clarifying the application of a policy on affordable workspace with additional supporting text
- adding a new policy to consider the impact of any development proposals upon the visual openness of green and open spaces
- clarifying that Ealing will apply the Urban Greening Factor as set out in the London Plan with a target of 0.4 for residential development and 0.3 for commercial development
- adding a new policy to promote local biodiversity improvement

- adding a new policy to promote sports and recreation facilities
- adding a new suite of policies on climate action including on operational energy performance, embodied carbon, the whole life cycle carbon approach and on reducing waste and supporting the circular economy

These are important changes and demonstrates that the council have listened to what the public and key stakeholders have said.

