

# Summary of Regulation 18 Issues and Responses

This section provides a brief summary of some of the key issues raised during the regulation 18 public and stakeholder consultation and provides an officer's response

## Engagement

### Issues

- some concerns were raised about the consultation and engagement being Insufficient
- there should been a physical mail-out of notices and/or documentation about the Local Plan

### Response

- the statutory period for a Local Plan regulation 18 consultation is six weeks. Ealing Council consulted for 10 weeks, from 30 November 2022 to 8 February 2023. This took account of both the holiday period and the unavoidable complexity of the plan. Direct mailouts do not in fact offer good response rates and would not have been a cost-effective way to engage with the largest number of interested people
- the targeted engagement that was adopted has resulted in a significantly increased number of responses relative to previous Local Plan consultations and has particularly resulted in an increase in responses from people who do not usually engage with the process
- the council organised a series workshops, walking tours, and high street events in each of the seven towns. The consultation was also advertised in Around Ealing, which reaches over 150,000 homes across the borough
- more than 13,000 responses were received which confirms the engagement exercise was highly successful. Any long consultation will inevitably coincide with one or another holiday season and this was clearly not prohibitive given the large number of responses that were received

## Climate Action

This section highlights concerns raised about 20 minute neighbourhoods, building performance, and green space protection and urban greening.

### 20 minute Neighbourhoods and Active Travel

## Issues

- significant levels of objection to the concept of 20 minute neighbourhoods were raised. It was viewed as a form of social engineering aimed at imprisoning residents in their local neighbourhood, and curtailing freedom. Cited to be a form of climate change lockdown. Attributed to higher global forces intent on introducing totalitarian oppression. Human made climate change is a fallacy. The concept is Low Traffic Neighbourhoods (LTNs) under another name and or in disguise. Discriminates against less mobile and entrenches disadvantages
- similar concerns raised were also raised regarding active travel measures with significant opposition to (perceived) anti-car interventions – LTNs, 20mph speed restrictions, cycle infrastructure, 20 minute neighbourhoods, ULEZ, to name a few. The policies represent a statement of intent only, with the plan lacking any concrete interventions and actions
- by contrast, there was some support for the 20 minute neighbourhoods' concept, but was more limited in number, and concerns were raised over achievability. The council have merely appropriated a label, to describe the existing situation and or strategy, but proposals are vague representing a statement of ambition only
- the Local Plan is not clear on how it will be achieved, lacking practical and or tangible interventions, and or demonstrates a poor understanding of the place. Where proposals are stated, these are also considered to be too narrow in focus (active travel routes only). Concern that any decision to cancel LTNs will now hamper future efforts to deliver this and similar initiatives

## Response

- in responding officers have sought to address the mischaracterisation of the 20 minute neighbourhood approach, clarifying its intent and addressing concerns raised over implementation. Our response advises that the 20 minute neighbourhood model forms an important spatial principle of the Local Plan influencing the direction of future growth and investment
- it is clarified that the goal is to create places where residents are enabled to fulfil the majority of their daily needs within a 20 minute roundtrip walk from their homes. Central to the approach is the need to secure improvements in accessibility and choice for everyone (and minimise reliance on the car), regardless of an individual's circumstances, budget or physical ability
- it is advised that the concept is intended to be tailored to respond to the specific needs of each community and town. It is acknowledged that all towns across the borough already enjoy some of these attributes, but there is variation in how they perform, and many centres do not as yet realise their full potential, owing to under-performing neighbourhood and town centres, alongside high levels of severance.

- creating 20 minute Neighbourhoods in Ealing means reinforcing the existing network of local high streets and centres across our seven towns. It is about growing a more sustainable place where investment and opportunity is fairly distributed across each of the seven towns, each playing a diverse role in promoting economic growth and social and cultural exchange for the communities they serve
- this concept of facilitating complete, compact and walkable neighbourhoods is not new to Ealing, with many of the same basic principles already promoted through earlier Local Plan documents. Whilst it is true that these policies seek to incentivise a return to 'local living,' where travel times are shorter and people are less dependent on cars, there is nothing in these policies which seeks to restrict freedom of movement, or confine individuals to certain areas or neighbourhoods. The concept and policies seek to give people more choice around how they access services, rather than removing existing choice and freedoms
- it is clarified that within each town plan (Chapter 4) a number of interventions are already identified. Further detail is also contained within spatial strategies (including 20 minute neighbourhood frameworks) for each town. To date '20 minute neighbourhood frameworks' have been prepared for Northolt, Acton, Greenford and Perivale. Ealing and Hanwell are due to be completed shortly

These frameworks were community led and prepared in collaboration with their respective local communities. These are non-statutory studies which where relevant form part of the wider evidence base for the new Local Plan.

## Building Performance

### Issues

- broad support for policies seeking to secure zero carbon developments
- general concern over reliance on offsetting and push for reduced reliance on this going forward
- concern that the overall strategy and policies facilitate and or permits building typologies and or forms which are inherently unsustainable, namely tall buildings with high embodied carbon content, undermining the overall ambition
- broad support for re-use of buildings in preference to new build
- development industry raises reservations around impact of new local policies on viability preferring instead for the council to align with the Government's Future Home Standards

### Response

- the Local Plan has been revised and re-organised which should assist in better articulating the outcomes and improve the effectiveness of different policy interventions

- it is noted that a number of additional policies have also been added to Chapter 5 addressing building performance, informed by the latest evidence (see the 'Delivering Net Zero' report). As revised three separate energy policies are proposed, the first encompassing operational energy, the second embodied carbon, and the third covering the whole life cycle approach which brings the first two together. A fourth related policy is proposed which seeks to embed circular economy principles into the decision-making process
- the proposed embodied carbon policy introduces embodied carbon limits for different building types. These policies re-define what qualifies as a zero-carbon development in Ealing, through establishing stretching targets for space heating demand, energy usage and embodied carbon, through mandating the use of more accurate metrics, and through prioritising the highest standards of performance on-site rather than deferring that responsibility off-site through offsetting arrangements
- these policies also extend the requirement to undertake whole life cycle carbon assessments for all major developments. In addition, it is noted that the revised policy now requires applicants to undertake an optioneering exercise as part of the Whole Life Cycle Carbon Assessment which seeks to evaluate in relative terms the carbon emission performance of different development options for an application site to determine the optimum option
- in practice, the findings of this optioneering exercise would be considered alongside other planning considerations to determine the most appropriate option, including consideration of a retrofit first approach, and different building forms (heights). The 'options' considered would include reuse/refurbishment options, alongside any new build options if pursued
- in respect of concerns noted by the development industry regarding implications for viability, it has been noted that the evidence base has tested these policies in respect of technical feasibility and viability. The revised policy approach is considered to be justified, effective and consistent with national policy objectives

## Green Space Protection and Urban Greening

### Issues

- strong push to protect the existing network of green space
- proposals to release or develop green space considered to be at odds with climate action commitment and or goals
- concern that the review of Green Belt and Metropolitan Open Land (MOL) was undertaken to release green open spaces for development
- the policies represent a statement of intent only, with the plan lacking concrete interventions and actions
- notable opposition to loss of allotments and concerns that allotments will be developed

- support for setting Urban Greening targets which exceed London Plan interim standards

#### Response

- the Local Plan establishes a framework for maintaining, enhancing and expanding the network of green infrastructure in the borough
- the purpose of the review of the borough's Green Belt and MOL designations was not to promote these sites for development but to ensure they have the appropriate designation and that there is consistency in how these designations are applied
- 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
- 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 and or MOL objectives, and which could be used to meet identified development needs and thus are identified for change in designation, or where limited releases are considered necessary to enable enhancements to the green network, 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
- where changes have been proposed to the designation of Green Belt and MOL, in the vast majority of cases these sites continue to be covered by other appropriate policy designations such as Public Open Space, Community Open Space or Site of Importance for Nature Conservation (SINC), and such policies continue to protect these sites from inappropriate development
- the new Local Plan does not propose any reduction in the allotment space available in the borough. 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 designation which reflects their local importance and safeguards them from inappropriate development. Bixley Fields (Southall) and Northfield (West Ealing) allotments will not be affected by any plans for the regeneration of the wider area
- 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

#### Housing Delivery

##### Issues

- concerns over the quantum and tenure of proposed affordable housing provision

##### Response

- Ealing is subject to a binding 10 year housing target of 21,570 homes as set out in the London Plan. This is confirmed by the Local Housing Needs Assessment (LHNA), and a full discussion of housing supply is set out in a separate Topic Paper
- policy HOU (in Chapter 5) sets out a unit-by-unit delivery against defined needs set out in the LHNA. This includes affordability levels calculated against ward level income data
- the plan is constrained by the London Plan and national policy relating to viability, but the policy seeks the delivery of the maximum affordable contribution from every housing development, measured by income and against defined local needs

## Infrastructure

### Issues

- requests for more information on Community Infrastructure Levy (CIL) and the Infrastructure Delivery Plan (IDP)
- development will put pressure on already stretched local services including local parks

### Response

- both the CIL Draft Charging Schedule and IDP will be published alongside the Reg 19 draft plan
- the Local Plan has been informed by the IDP which sets out key infrastructure needs to meet proposed new development in Ealing's seven towns and the borough as a whole. Each proposed site allocation includes a set of design principles and key infrastructure requirements

## Tall Buildings

### Issues

- concerns over restrictions and or permissiveness of tall buildings policy
- concerns that increased densification is not supported by supporting infrastructure

### Response

- tall buildings and intensification will follow a character-led approach based upon the comprehensive Ealing Character Study
- detailed guidance on building height is set out in the Tall Buildings Strategy, Policy D9 (Chapter 5) and is reflected in individual site allocations (in Chapter 4)
- infrastructure needs will be supported by the Infrastructure Delivery Plan and Schedule and the introduction of a new 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

- tall buildings are specifically understood to be an exceptional form of development acceptable only as part of a strategy to optimise growth in the most sustainable areas and subject, as all major development, to whole life carbon assessments

## Affordable Workspace

### Issues

- concerns over the limits, extent and affordability of the policy on affordable workspace

### Response

- the affordable workspace policy (Policy E3 in Chapter 5) has been subject to viability assessment and site-specific viability evidence can also be considered as in any application together with material evidence about onsite provision

## Gypsies and Travellers

### Issues

- why does the council need to provide additional pitches for the GRT community?
- concern about the loss of Green Belt and MOL land or impact on archaeological monuments
- an adverse impact on residential amenity and house prices of neighbouring residential properties
- an adverse impact on the last working farm in the borough
- the lack of required local infrastructure and amenities
- consultation and engagement were insufficient

### Response

- there is a need to provide additional pitches for the Gypsy and Traveller (G&T) community. A need for six additional G&T pitches has been identified through the West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2018) and the council has a statutory responsibility to demonstrate how we can meet this need
- the Local Plan will not be found to be legally compliant or sound if it does not show how it will meet the need for additional G&T pitches
- the council is not proposing to allocate a greenfield site. After careful assessment it has been decided that we proceed with the Kingdom Workshop, Sharvel Lane, next to the Downs Barn Farm, and will accommodate six pitches. The space

proposed is on part of the West London Shooting Ground (Site 5a) and equates to 0.48 hectares. It is located on previously developed land. There will be no impact on accessible green and open space or harm to wildlife

- with the exception of the neighbouring farmhouse there will no adverse amenity impact on neighbouring residential properties
- the allocated site is adjacent to an ancient monument and any future planning application for development on this site will need to consider any impacts. It is quite likely that in the event of any remains of any archaeological interest that these will have been already severely damaged by the existing unauthorised use on the site consisting of a lorry repair yard
- the allocated site is already on developed land and therefore there are no plans to either evict the current leaseholder of the farmland or use of any of the pasture lands currently used for the horse livery and cattle farm. It will also have a negligible impact on requirements for local infrastructure or amenities although the allocated site will need to be connected to the utility network
- regards consultation and engagement, site notices were displayed at the relevant sites, hard copies of the relevant reports were displayed in the two libraries in Northolt and printed notices were placed in the local papers and the council's web pages advertising the consultation. The statutory period for the consultation is six weeks and this was followed. All responses received within the consultation period were read and carefully considered before final proposals were developed

## Development Sites

This section deals with general information and then highlights a number of specific Development Sites that are being carried forward to Regulation 19.

### General

#### Issues

- there were a significant number of representations received on proposed Development Sites for a variety of different reasons

#### Response

- the Development Sites (or Site Allocations) that accompany each Town Plan have been subject to a number of significant changes. These changes are based upon public and stakeholder feedback at Regulation 18 together with a further assessment of site suitability and deliverability. Table 1 provides a summary of the changes
- the key points to note are:
  1. Of the 118 sites consulted upon at Regulation 18, 40 have not been carried through into Regulation 19. These include Acton Central Station



Yard (AC03), West Acton Community Centre (AC13), Ealing Riding School (EA33) and Hanwell Children's Centre (HA03), amongst others

2. Four entirely new sites have been added arising from the 'call for sites' making a revised total of 82 sites
  3. 21 sites have had their red line boundaries amended
- each of the 82 Development Sites now also includes:
    1. updated proposed uses for the site and an indicative timetable for delivery
    2. consideration of any relevant contextual circumstances, design principles and key infrastructure requirements to guide any future development proposals
    3. where appropriate, specific guidance on the suitability of any tall buildings and parameters on scale, height and massing

## Specific Sites

Gurnell Leisure Centre (Reg 18: EA28; Reg 19: 19EA)

### Issues

- concerns about the quantum of development and loss of MOL
- desire for the leisure centre to be replaced and for better sports and leisure facilities
- concern expressed about the lack of progress in providing a replacement

### Response

- the council has carried out a review of options for the future of Gurnell informed by an extensive listening exercise, including an in-depth survey of local people in June 2022
- the Reg 19 proposed site allocation Gurnell Leisure Centre sets out the Council's proposals for a leisure-led scheme that will reprovide the pool through some enabling development to help with costs of either refurbishing or replacing the existing facilities
- any scheme will be required to incorporate a comprehensive package of open space enhancements, including improvements related to accessibility (including a new pedestrian bridge over the river connecting to Longfield Playing Field), outdoor sporting facilities, landscaping, flood mitigation, wayfinding and biodiversity

Former Barclays Sports Ground (Reg 18: EA31; Reg 19: 21EA)

### Issues

- concerns about loss of MOL and or building on MOL

- necessity to bring the sports pitches back into use, particularly for the neighbouring Ada Lovelace School

#### Response

- development of this site will be to secure replacement supporting leisure facilities, principally for outdoor leisure activities that support wider community access and have regard to the Sports Facilities Strategy
- the quantum of enabling residential development must be limited to the amount absolutely necessary to financially secure the delivery of the replacement leisure centre and limit the amount of development on open space by focussing it on existing previously developed land (the existing club house and immediate hardstanding)

#### Old Actonians Sports Ground (Reg 18: EA34; Reg 19: 23EA)

##### Issues

- concerns about the loss of sports fields and facilities and inappropriate development

##### Response

- the council appreciates the value of Old Actonians Sports Ground. Proposals for Old Actonians are to support the overriding objective to enhance the outdoor leisure offer, secure the long-term future of these activities and improve daytime access for local schools
- any proposed residential development will need to be the smallest amount needed to enable the upgrading and delivery of the leisure facilities alongside greening and biodiversity enhancements and improved management of Baron's Pond

#### Havelock Estate (Reg 18: SO12; Reg 19: 09SO)

##### Issues

- objections to development on Bixley Field Allotments

##### Response

The site boundary has now been amended to remove Bixley Field Allotments from the proposed site allocation.

#### Warren Farm (Reg 18: SO10; Reg 19: 16SO)

##### Issues

- objections to any development on MOL and SINC and damage to wildlife and biodiversity
- no need for sports facilities here

#### Response

- the council appreciates and values Warren Farm's nature, biodiversity, and role as an important green space for local people
- the council are exploring the best way to preserve the wild character of Warren Farm as a place for local people to enjoy nature, as well as re-provide the community sports facilities that have existed on the site for many years and which will serve the people of Southall, Hanwell and beyond

Table 1: Development Sites:  
Summary of changes between Regulation 18 and Regulation  
19

DEVELOPMENT SITES AT REGULATION 19:	WITHDRAWN DEVELOPMENT SITES AT REGULATION 18:
<p style="text-align: center;"><b>** Denotes boundary has been amended</b></p> <p style="text-align: center;"><b>Note: Numbers/Letters = Reg 19 classification e.g. 01AC whilst Letters/Numbers = Reg 18 classification e.g. AC01</b></p>	
<b>ACTON</b>	
01AC Acton Gateway (Morrisons) (AC01)	The Steyne Estate (AC02)
02AC Acton Gardens (AC04)**	Acton Central Station Yard (AC03)
03AC Ealing Common Depot (AC06)	Acton Town Station Approach (AC05)
04AC Builders Merchants Bollo Bridge Road (AC07)	Haddon Court & Burghley Tower (AC10)
05AC Salisbury Street Car Park & Neville Close (AC08)**	Friary Park (AC11)
06AC Acton Vale Industrial Park & Westgate House (AC09)	Acton Crossrail Station Sidings (AC12)
07AC Dean Court (New)	West Acton Community Centre (AC13)
08AC Oaktree Court (New)	
<b>EALING</b>	
01EA Broadway Connection & Arcadia (EA01)**	Ealing Broadway Station (EA04)
02EA Ealing Broadway Shopping Centre & Crystal House (EA02)	Central Chambers (EA05)
03EA Sandringham Mews (EA03)	Haven Green Car Park (EA06)
04EA Eastern Gateway (EA08)**	Carmelita House (EA07)
05EA Perceval House (EA10)	Ealing Studios etc (EA09)
06EA 49 - 69 Uxbridge Road (EA11)	Arden Road Car Park (EA14)
07EA CP House (EA12)	1-19 Broadway etc (EA15)
08EA Craven House (EA13)	130-140 Broadway, W Ealing (EA21)
09EA 66 - 86 Broadway, West Ealing (EA16)	Green Man Lane Estate (EA23)

10EA 59 - 65 Broadway, West Ealing (Lidl) (EA17)	Twyford Abbey (EA30)
11EA Sainsbury's & Library, West Ealing (EA18)	Ealing Riding School (EA33)
12EA Chignell Place, West Ealing (EA19)	University of West London (EA35)
13EA 99 - 113 Broadway, West Ealing (EA20)**	
14EA Western Gateway, 131 - 141 Broadway, West Ealing (EA22)	
15EA Waitrose, West Ealing (EA24)	
16EA West Ealing Station Approach (EA25)	
17EA Castle House (EA26)	
18EA Access House & T Mohan, West Ealing (EA27)	
19EA Gurnell Leisure Centre (EA28)	
20EA Downhurst Residential Care Home (EA29)	
21EA Former Barclays Sports Ground (EA31)	
22EA 96 Queens Drive, Tel Service Centre & 33 Hanger Lane (EA32)**	
23EA Old Actonians Sports Ground (EA34)	
24EA Wickes, South Ealing Road (EA36)	
25EA Travis Perkins, Popes Lane (EA37)	
GREENFORD	
01GR Greenford Hall, Methodist Church, Police Station & Clinic (GR01)**	Stanhope Primary School and Education Centre (GR03)
02GR Greenford Broadway Car Park (GR02)**	Progress House and Garage (GR04)
03GR 370 - 388 Oldfield Lane North (GR07)	Ravenor Park Farm (GR05)
04GR Westway Cross (GR08)	Windmill Nursery Centre (GR06)
05GR Former Greenwich School of Management (GR09)	
06GR Smiths Farm (GR10)	
HANWELL	
01HA Land to the front of Ealing Hospital (HA01)**	Car Sales, Hanwell Bridge (HA02)
02HA Gray's Garage (HA04)	Hanwell Children's Centre (HA03)
03HA George Street Car Park (HA05)	St Mary's Convent (HA08)
04HA Site of Lidl and discount store (HA06)	Access Storage (HA09)

05HA Marshall Site, Gold's Gym & Garages on Montague Avenue (HA07)	Eversheds Sports Ground (HA11)
06HA Tile Depot & Lambourn Close (HA10)**	
07HA Copley Close Estate (HA12)	
08HA High Lane Housing Estate (HA13)	
NORTHOLT	
01NO Car Sales Site and Northolt Leisure Centre (NO01)**	Northolt High School (NO03)
02NO Mandeville Parkway (NO02)	Islip Manor Housing Estate (NO04)
03NO Northolt Sorting Office (NO05)	White Hart Roundabout (NO07)
04NO Northolt Driving Range NO06)	Electricity Substation, Ruislip Road (NO10)
05NO Medlar Farm Estate (NO08)	Telephone Exchange (NO11)
06NO Yeading Lane I (NO09)	Community Centre & St Raphael's Primary School (NO14)
07NO Yeading Lane II (NO12)	
08NO Grange Court (NO13)	
09NO Kingdom Workshop, Sharvel Lane (NO15)**	
10NO Airways Estate (New)	
PERIVALE	
01PE BP Garage (PE01)	
02PE Land on the South Side of Western Avenue (PE02)	
03PE Alperton Lane North (PE03)	
04PE Alperton Lane South and Metroline Depot (PE04)	
SOUTHALL	
01SO Southall Crossrail Station and Gurdwara (SO01)	Park Avenue (SO02)
02SO Southall Sidings (SO03)	Herbert Road Car Park (SO07)
03SO Former Sorting Office & Kings Hall Methodist Church (SO04)	The Arches Business Centre (SO09)
04SO Southall West London College (SO05)**	Hansen's Timber Yard (SO21)
05SO 31 - 45 South Road & Tel Exchange, Quality Foods & Iceland (SO06)	Car Sales, Queenstyle and MBS (SO22)
06SO Fairlawn Hall and Science of the Soul Centre (SO08)**	Southall TA Barracks (SO25)
07SO The Limes, Maypole Court, Banq. Centre, 13 - 19 The Green (SO10)	

08SO Middlesex Business Centre (SO11)	
09SO Havelock Estate (SO12)**	
10SO The Green (SO13)	
11SO The Green Quarter (Southall Gasworks) (SO14)	
12SO Scotts Road Trading Estate (SO15)**	
13SO Endsleigh Industrial Estate (SO16)**	
14SO Witley Works (SO17)**	
15SO Monorep Site (SO18)	
16SO Warren Farm and Imperial College Land (SO19)**	
17SO Great Western Triangle Centre (SO20)	
18SO Golf Links Estate (SO23)**	
19SO Cranleigh Gardens Industrial Estate & Kingsbridge Crescent (SO24)**	
20SO Hambrough Tavern (SO26)	
21SO Toplocks Estate (New)	