

**Ealing Council**

**Local Plan Regulation 19  
Site Selection Report:  
Main Report**

**January 2024**

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# 1. Introduction

Ealing Council ('the council') is in the process of preparing a new Local Plan that will set out how the borough will grow and evolve over the next 15 years. The Local 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)<sup>1</sup> and its aspiration for achieving Good Growth.

All local planning authorities (LPAs) are required to produce development plans with the aim of delivering sustainable development that meets the needs of residents over a defined plan period. Ealing Council's new Local Plan aims to allocate sufficient land in appropriate locations to ensure that the council meets its housing and employment needs over a 15-year plan period. As part of this Local Plan, site allocation policies will promote a comprehensive approach to future development, will ensure proposals make effective use of land with a suitable use or mix of uses and will ensure that development is co-ordinated with appropriate infrastructure requirements.

The overall aim of this Site Selection Report ('the Report') is to outline the council's approach to the selection of site allocations (development sites) that have been identified to meet these development requirements throughout the council's Local Plan process.

## 1.1 Purpose of this Report

### 1.1.1 Regulation 18 and 19 Consultation

The council published its Initial Proposals (Regulation 18) between November 2022 and February 2023. At the same time it published a Site Selection Report, Regulation 18 as part of the evidence base that supported the emerging plan. This was subject to a statutory public and stakeholder consultation period to obtain feedback from the local community, residents, businesses, developers and statutory consultees. As part of this process a 'call for sites' exercise was also undertaken.

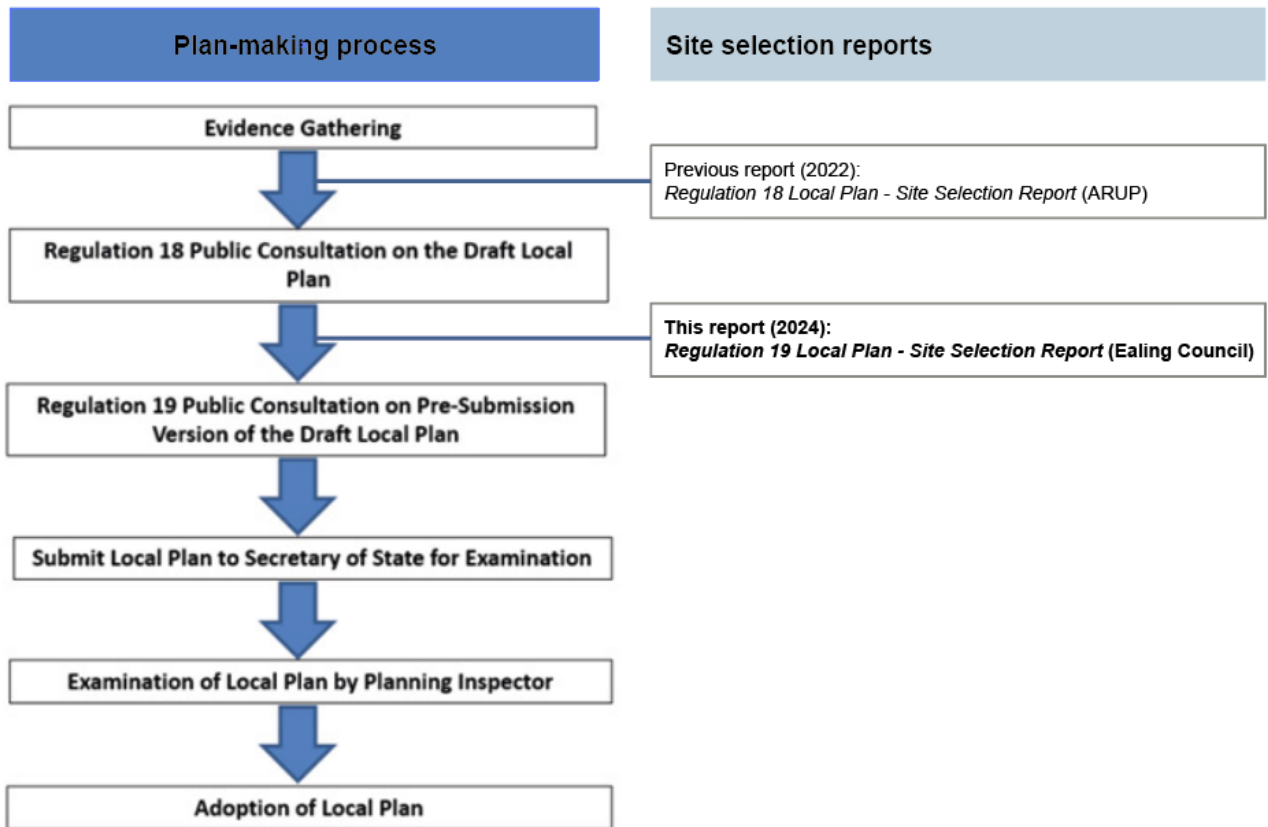
In addition, a further focussed consultation on additional site allocations for gypsy and traveller pitch provision was also undertaken between July and August 2023.

The council published its Final Proposals (Regulation 19) on February 28<sup>th</sup>, 2024. In producing this iteration of the plan, careful consideration was given to consultation feedback received at Regulation 18, additional evidence base and the latest information available to the council.

This Site Selection Report, Regulation 19 has been produced by Ealing Council and presents a revised and updated approach to assessing potential Development Sites (or site allocations) that have been included in the plan. This report is part of the evidence base that informs the Local Plan. It does not by itself allocate sites for development but provides a summary of proposed site allocations to be included in the Local Plan at Regulation 19. It also outlines the site selection methodology (SSM) used and the assessment process undertaken following Regulation 18 consultation.

Figure 1.1 illustrates how this report sits within the council's local plan-making process and the key stages in the process. Following the Regulation 19 public and stakeholder consultation, the council will submit the plan for examination including the supporting evidence base and this report.

Figure 1.1: Diagram outlining the Local Plan-making process.



### 1.1.2 National policy underpinning the Site Selection Methodology

The Site Selection Methodology (SSM) is an important part of the evidence base supporting site allocations policy that must be founded on a robust approach, undertaken in a transparent manner, and fully documented at key stages.

The SSM takes into account relevant national and regional policy, through the National Planning Policy Framework<sup>4</sup> (NPPF 2021), Planning Practice Guidance<sup>5</sup> (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).

Appendix A of this Report 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 decisions and professional judgements by both assessors and local officers have been clearly justified in Chapters 2 and 3.

### 1.1.3 Stages of the Site Selection Methodology (SSM)

As with the Site Selection Report at Regulation 18, the SSM for Regulation 19 has followed the following stages which outline the council’s approach to identifying and assessing sites before taking them forward into the Local Plan at Regulation 19:

- **Stage 1** - Identifying sites for assessment
- **Stage 2** – Undertaking Suitability assessments
- **Stage 3** – Undertaking Capacity assessments
- **Stage 4** – Undertaking Deliverability assessments
- **Stage 5** – Identifying potential sites for allocation
- **Stage 6** – Inputting to the council’s housing supply evidence

Full details of this six-stage process can be found in Chapter 3 of this report which deals with the Site Selection Methodology.

#### 1.1.4 Consultation feedback

The Regulation 18 public and stakeholder consultation provided an important opportunity for the council to gather critical information from landowners, developers and site promoters to support the suitability, deliverability and capacity assessments of potential and proposed Development Sites (or site allocations) in the Proposed Submission Local Plan (Regulation 19). T

The Site Selection Methodology outlined in Chapter 3 explains how qualitative and quantitative feedback gained from the Regulation 18 consultation from a range of public and private stakeholders has contributed to a more comprehensive site assessment process at Regulation 19.

As a consequence, the number and type of site allocations has changed between the publication of the Regulation 18 and Regulation 19 Draft Local Plans.

The key changes to the list of proposed Development Sites are outlined in Chapter 2 in a Summary of Recommendations which sets out the proposed site allocations and how they will input into the council’s 5 Year Housing Land Supply and 15-year Housing Trajectory.

#### 1.1.5 Evidence underpinning the Site Selection Methodology (SSM)

As per the Regulation 18 site assessment, the council has reviewed a suite of evidence base documents to inform which sites should proceed as proposed site allocations in the Proposed Submission Local Plan (Regulation 19). Such evidence includes:

- Strategic Housing Land Availability Assessment (SHLAA)
- Strategic Housing Market Assessment (SHMA)
- Strategic Housing Market Assessment Update
- Preferred Spatial Option Report
- Integrated Impact Assessment
- Ealing Green Belt and Metropolitan Open Land Review
- Infrastructure Delivery Plan
- Ealing Character Study
- Housing Design Guide
- Tall Buildings Strategy
- Strategic Flood Risk Assessment
- Gypsy and traveller pitch provision

More information on evidence base studies relevant to site selection can be found at Appendix B of this report. The reports are all available on the council’s web pages here:

[Evidence base | Evidence base | Ealing Council](#)

## 1.2 Housing and employment land requirements

### 1.2.1 Land for 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<sup>7</sup> to support the Local Plan process which outlines the approach to establishing a supply position and captures current assumptions and requirements for further work. To this end the Council has prepared and maintains a Five-Year Housing Land Supply Position Statement and Housing Trajectory<sup>8</sup> which identifies what supply is anticipated to be delivered over the plan period and considers whether this is sufficient to meet the target.

### 1.2.2 Land for employment

The London Plan states that sufficient employment and industrial space in the right locations must be planned for to support economic development and regeneration. The London Plan does not include industrial or office need figures for boroughs.

The West London Employment Land Evidence Report (2019)<sup>9</sup> 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. Concluding with the need for a net uplift of 1ha of industrial land.

The 2021/22 West London Employment Land Review<sup>10</sup> update concluded that it is critical that in Ealing as much functional industrial floorspace as possible is retained and upgraded; and confirmed the conclusions of the 2019 study.

This evidence underpins the Local Plan process which, in line with the London Plan, includes draft policies and potential site allocations designed to protect and increase the supply of industrial land. A comprehensive review of Ealing's industrial land has highlighted that some sections of SIL do not perform in their current designation and that redesignation as LSIS will help to drive industrial redevelopment, supported by mixed enabling development where this can be shown by agreed master planning to deliver the requirements of policy. A few small, detached areas of SIL may also be suitable for

industrial-led mixed use intensified development, subject to the same master planning arrangements.

Ealing's town centres represent a complementary 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 19 Local Plan identify the most appropriate locations for the delivery of strategic office growth.

## 2. Summary of Recommendations

### 2.1 Overview

Following the Regulation 18 consultation, the site selection process was revisited in preparation of the Regulation 19 Proposed Submission Local Plan to take account of engagement feedback received and new information available. This selection process involved reviewing 118 Potential Site Allocations identified at Regulation 18 against new information, as well as reviewing 32 additional sites that were submitted to the council through the Regulation 18 Call for Sites process.

From a total 150 Potential Site Allocations that were identified, 35 sites were discounted before the remaining 112 were assessed using the Methodology outlined in Chapter 3. From the outcomes of the site assessments, a further 30 sites were discounted, and a final 82 sites were proposed as Site Allocations in the Regulation 19 Proposed Submission Local Plan (see Table 2.1 for list of the sites and Table 2.2 for the number of sites by each town).

Sites proposed to be allocated are those considered to be strategic or key sites with regard to the number of homes to be provided and the contribution of the site towards the council's good growth aspirations. These sites are intended to act as a catalyst for regeneration, improvement and renewal in local areas. A Strategic Site is defined as one capable of delivering 100 or more net new homes. Key Sites are those considered critical to the delivery of the vision for the area but delivering under 100 new net units.

**Table 2.1: Proposed Site Allocations in Regulation 19 Draft Local Plan:**

Site Reference & Name (Regulation 19)	Former Site Reference & Name at Regulation 18 (if applicable)
<b>ACTON</b>	
<b>01AC</b> Acton Gateway (Morrisons)	AC01
<b>02AC</b> Acton Gardens	AC04
<b>03AC</b> Ealing Common Depot	AC06
<b>04AC</b> Builders Merchants Bollo Bridge Road	AC07
<b>05AC</b> Salisbury Street Car Park & Neville Close	AC08
<b>06AC</b> Acton Vale Industrial Park & Westgate House	AC09
<b>07AC</b> Dean Court	Not applicable – New site from Call for Sites
<b>08AC</b> Oaktree Court	Not applicable – New site from Call for Sites
<b>EALING</b>	
<b>01EA</b> Broadway Connection & Arcadia Shopping Centre	EA01 Broadway Connection
<b>02EA</b> Ealing Broadway Shopping Centre & Crystal House	EA02
<b>03EA</b> Sandringham Mews	EA03
<b>04EA</b> Eastern Gateway	EA08



Site Reference & Name (Regulation 19)	Former Site Reference & Name at Regulation 18 (if applicable)
<b>EALING</b>	
05EA Perceval House	EA10
06EA 49 - 69 Uxbridge Road	EA11
07EA CP House	EA12
08EA Craven House	EA13
09EA 66 - 86 Broadway, West Ealing	EA16
10EA 59 - 65 Broadway, West Ealing (Lidl)	EA17
11EA Sainsbury's & Library, West Ealing	EA18
12EA Chignell Place, West Ealing	EA19
13EA 99 - 113 Broadway, West Ealing	EA20 99 - 115 Broadway, West Ealing
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 96 Queens Drive & Telephone Service Centre
23EA Old Actonians Sports Ground	EA34
24EA Wickes, South Ealing Road	EA36
25EA Travis Perkins, Popes Lane	EA37
<b>GREENFORD</b>	
01GR Greenford Hall, Methodist Church, former Police Station, former Clinic & Greenford Library	GR01 Greenford Hall, Methodist Church, Police Station & Clinic
02GR Greenford Broadway Car Park, 2-4 Oldfield Lane S, 177 & 177A Greenford Road	GR02 Greenford Broadway Car Park
03GR 370 - 388 Oldfield Lane North	GR07
04GR Westway Cross	GR08
05GR Former Greenwich School of Management	GR09
06GR Smiths Farm and Allendale	GR10

Site Reference & Name (Regulation 19)	Former Site Reference & Name at Regulation 18 (if applicable)
<b>HANWELL</b>	
01HA Land to the front of Ealing Hospital	HA01 Ealing Hospital
02HA Gray's Garage	HA04
03HA George Street Car Park	HA05
04HA Site of Lidl and discount store	HA06
05HA Marshall Site, Gold's Gym & Garages on Montague Avenue	HA07
06HA Tile Depot & Lambourn Close	HA10
07HA Copley Close Estate	HA12
08HA High Lane Housing Estate	HA13
<b>NORTHOLT</b>	
01NO Car Sales Site and Northolt Leisure Centre	NO01 Car Sales Site
02NO Mandeville Parkway	NO02
03NO Northolt Sorting Office	NO05
04NO Northolt Driving Range	NO06
05NO Medlar Farm Estate	NO08
06NO Yeading Lane I	NO09
07NO Yeading Lane II	NO12
08NO Grange Court	NO13
09NO Kingdom Workshop, Sharvel Lane	Not applicable – New site
10NO Airways Estate	Not applicable – New site from Call for Sites
<b>PERIVALE</b>	
01PE BP Garage	PE01 Starvin' Marvin's & Garage
02PE Land on the South Side of Western Avenue	PE02
03PE Alperton Lane North	PE03
04PE Alperton Lane South and Metroline Depot	PE04
<b>SOUTHALL</b>	
01SO Southall Crossrail Station and Gurdwara	SO01
02SO Southall Sidings	SO03
03SO Former Sorting Office & Kings Hall Methodist Church	SO04

Site Reference & Name (Regulation 19)	Former Site Reference & Name at Regulation 18 (if applicable)
<b>SOUTHALL</b>	
<b>04SO</b> Southall West London College	SO05
<b>05SO</b> 31 - 45 South Road & Tel Exchange, Quality Foods & Iceland	SO06
<b>06SO</b> Fairlawn Hall, Shrubbery Road & High Street	SO08 Fairlawn Hall
<b>07SO</b> The Limes, Maypole Court, Banqueting Centre, 13 - 19 The Green	SO10
<b>08SO</b> Middlesex Business Centre	SO11
<b>09SO</b> Havelock Estate	SO12
<b>10SO</b> The Green	SO13
<b>11SO</b> The Green Quarter (Southall Gasworks)	SO14
<b>12SO</b> Scotts Road Trading Estate	SO15
<b>13SO</b> Endsleigh Industrial Estate	SO16
<b>14SO</b> Witley Works	SO17
<b>15SO</b> Monorep Site	SO18
<b>16SO</b> Warren Farm	SO19
<b>17SO</b> Great Western Triangle Centre	SO20
<b>18SO</b> Golf Links Estate	SO23
<b>19SO</b> Cranleigh Gardens Industrial Estate & Kingsbridge Crescent	SO24
<b>20SO</b> Hambrough Tavern	SO26
<b>21SO</b> Toplocks Estate	Not applicable – New site from Call for Sites

**Table 2.2: Summary of Proposed Site Allocations by Town at Regulation 19:**

Town	Number of Sites
Acton	8
Ealing	25
Greenford	6
Hanwell	8
Northolt	10
Perivale	4
Southall	21
<b>Total</b>	<b>82</b>

## 2.2 Stage 1: Identifying Sites for Assessment

In addition to the 118 Potential Site Allocations that were consulted on in the Regulation 18 Draft Local Plan (see *Regulation 18 Local Plan – Site Selection Report, 2022*), another 32 sites were recommended to the council via the Regulation 18 Call for Sites process.

Before proceeding to the Stage 2 Suitability Assessment, a review of all 150 Potential Site Allocations was undertaken to determine which sites would progress to the suitability assessment. This review entailed reviewing all 150 sites against latest information available including Regulation 18 engagement feedback, officer feedback and latest data. 35 of the original 118 Potential Site Allocations identified at Regulation 18 were not taken forward at this stage of the assessment for one or more of the following reasons:

- Construction has started/existing planning permission has been implemented
- Small site (<0.25ha) with limited development potential
- Lack of support from landowner
- Lack of support from statutory or specialist organisations
- Lack of support from the public including residents and community organisations
- Known suitability issues
- Known deliverability issues

33 sites were submitted via the Regulation 18 Call for Sites process. Of these submissions, one site was submitted twice by two separate individuals (Goldsmiths Allotments), and another site, Land South of Sharvel Lane/West London Shooting Ground was a resubmission of an Early Call for Sites that was included as a potential site allocation (NO15) in the Regulation 18 draft Local Plan. Two sites were merged with existing Regulation 18 sites: 33 Hanger Lane was merged with EA32 96 Queens Drive & Telephone Service Centre, and Science of the Soul Centre was merged with SO08 Fairlawn Hall. The remaining 29 sites were taken forward individually to be assessed for suitability and deliverability.

A list of sites not taken forward at Stage 1 of the Regulation 19 site selection process can be found below in Table 2.3.

**Table 2.3: List of sites omitted at Stage 1: Identifying sites (total no 35):**

Regulation 18 Site Reference & Name	Regulation 18 Site Reference & Name
<b>ACTON</b>	GR05 Ravenor Park Farm
AC02 The Steyne Estate	GR06 Windmill Nursery Centre
AC03 Acton Central Station Yard	<b>HANWELL</b>
AC05 Acton Town Station Approach	HA02 Car Sales Hanwell Bridge
AC11 Friary Park	HA03 Hanwell Children's Centre
AC12 Acton Crossrail Station Sidings	HA08 St Mary's Convent
AC13 West Acton Community Centre	HA09 Access Storage
<b>EALING</b>	HA11 Evershed Sports Ground
EA04 Ealing Broadway Station	<b>NORTHOLT</b>
EA05 Central Chambers	NO03 Northolt High School
EA06 Haven Green Car Park	NO07 White Hart Roundabout

Regulation 18 Site Reference & Name	Regulation 18 Site Reference & Name
EA07 Carmelita House	NO10 Electricity Sub Station Ruislip Road
EA09 Ealing Studios, Royal Mail Delivery office and Telephone Exchange	NO11 Telephone Exchange
EA14 Arden Road Car Park	NO14 Northolt Grange Community Centre & St Raphael's Primary School
EA15 1 - 19 Broadway, Aviation & Pioneer Courts	<b>SOUTHALL</b>
EA21 130 - 140 Broadway, West Ealing	SO07 Herbert Road Car Park
EA23 Green Man Lane Estate	SO09 The Arches Business Centre
EA35 University of West London	SO21 Hanson's Timber Yard & Motec
<b>GREENFORD</b>	SO22 Car Sales, Queenstyle and MBS
GR03 Stanhope Primary School and Ealing Education Centre	SO25 Southall TA Barracks
GR04 Progress House and Garage	

## 2.3 Stage 2: Suitability Assessment and Stage 3: Deliverability Assessment

Following Stage 1, 114 total sites were identified as Potential Site Allocations and these sites were assessed against a series of standard suitability and deliverability criteria, with a summary for each criteria assessment provided in Chapter 3: Site Selection Methodology and more details in Appendices C and D.

The suitability and deliverability assessments are based on information that was available prior to Regulation 19 consultation including Regulation 18 engagement feedback, officer feedback and latest data. The methodology outlined in Chapter 3 provides commentary on the specific information that was available for each of the criteria assessments prior to Regulation 19.

Appendix E contains the results of the suitability and deliverability assessment including a proforma for each of the 114 sites including:

- Site information and site plan
- Suitability scoring and qualitative assessment undertaken at Regulation 19
- Deliverability scoring and summary assessment undertaken at Regulation 19.

## 2.4 Stage 4: Identifying Sites for Allocation

All 114 sites were reviewed by officers to determine whether they should progress to Regulation 19 consultation as Proposed Site Allocations.

30 sites were discounted at this stage as a result of judgements made on the likelihood of coming forward for development within the plan period based on the suitability and deliverability assessments undertaken to date. In addition, officers reviewed site boundaries which led to the amendment of 22 site boundaries.

The Stage 4 exercise identified 82 sites that could be delivered within the plan period and these sites were taken forward into the Regulation 19 Proposed Submission Local Plan as Proposed Site Allocations. A summary of the key changes and decision-making made at this stage is outlined below in Table 2.4.

**Table 2.4: Summary of key changes at Stage 4 of the site assessment:**

<b>Former Site Reference &amp; Name at Regulation 18</b>	<b>New Site Reference &amp; Name at Regulation 19 (if allocated)</b>	<b>Status of site for Regulation 19 consultation</b>
<b>ACTON</b>		
AC01 Acton Gateway (Morrisons)	01AC Acton Gateway (Morrisons)	Allocated
AC04 Acton Gardens	02AC Acton Gardens	Allocated
AC06 Ealing Common Depot	03AC Ealing Common Depot	Allocated
AC07 Builders Merchants Bollo Bridge Road	04AC Builders Merchants Bollo Bridge Road	Allocated
AC08 Salisbury Street Car Park & Neville Close	05AC Salisbury Street Car Park & Neville Close	Allocated
AC09 Acton Vale Industrial Park & Westgate House	06AC Acton Vale Industrial Park & Westgate House	Allocated
AC10 Haddon Court & Burghley Tower	Not allocated	Not allocated
New Call for Sites - Dean Court	07AC Dean Court	Allocated
New Call for Sites - Oaktree Court	08AC Oaktree Court	Allocated
EA01 Broadway Connection	01EA Broadway Connection & Arcadia Shopping Centre	Allocated
<b>EALING</b>		
EA02 Ealing Broadway Shopping Centre & Crystal House	02EA Ealing Broadway Shopping Centre & Crystal House	Allocated
EA03 Sandringham Mews	03EA Sandringham Mews	Allocated
EA08 Eastern Gateway	04EA Eastern Gateway	Allocated
EA10 Perceval House	05EA Perceval House	Allocated
EA11 49 - 69 Uxbridge Road	06EA Uxbridge Road	Allocated
EA12 CP House	07EA CP House	Allocated
EA13 Craven House	08EA Craven House	Allocated
EA16 66 - 86 Broadway, West Ealing	09EA 66 - 86 Broadway, West Ealing	Allocated
EA17 59 - 65 Broadway, West Ealing (Lidl)	10EA 59 - 65 Broadway, West Ealing (Lidl)	Allocated
EA18 Sainsbury's & Library, West Ealing	11EA Sainsbury's & Library, West Ealing	Allocated
EA19 Chignell Place, West Ealing	12EA Chignell Place, West Ealing	Allocated
EA20 99 - 115 Broadway, West Ealing	13EA 99 - 113 Broadway, West Ealing	Allocated

Former Site Reference & Name at Regulation 18	New Site Reference & Name at Regulation 19 (if allocated)	Status of site for Regulation 19 consultation
EA22 Western Gateway, 131 - 141 Broadway, West Ealing	14EA Western Gateway, 131 - 141 Broadway, West Ealing	Allocated
EA24 Waitrose, West Ealing	15EA Waitrose, West Ealing	Allocated
EA25 West Ealing Station Approach	16EA West Ealing Station Approach	Allocated
EA26 Castle House	17EA Castle House	Allocated
EA27 Access House & T Mohan West Ealing	18EA Access House & T Mohan West Ealing	Allocated
EA28 Gurnell Leisure Centre	19EA Gurnell Leisure Centre	Allocated
EA29 Downhurst Residential Care Home	20EA Downhurst Residential Care Home	Allocated
EA30 Twyford Abbey	Not allocated	Not allocated
EA31 Former Barclays Sports Ground	21EA Former Barclays Sports Ground	Allocated
EA32 96 Queens Drive & Telephone Service Centre	22EA Queens Drive, Telephone Service Centre & 33 Hanger Lane	Allocated
EA33 Ealing Riding School	Not allocated	Not allocated
EA34 Old Actonians Sports Ground	23EA Old Actonians Sports Ground	Allocated
EA36 Wickes, South Ealing Road	24EA Wickes, South Ealing Road	Allocated
EA37 Travis Perkins, Popes Lane	25EA Travis Perkins, Popes Lane	Allocated
<b>GREENFORD</b>		
GR01 Greenford Hall, Methodist Church, Police Station & Clinic	01GR Greenford Hall, Methodist Church, former Police Station, former Clinic & Greenford Library	Allocated
GR02 Greenford Broadway Car Park	02GR Greenford Broadway Car Park, 2-4 Oldfield Lane South, 177 & 177A Greenford Road	Allocated
GR07 370-388 Oldfield Lane North	03GR 370-388 Oldfield Lane North	Allocated
GR08 Westway Cross	04GR Westway Cross	Allocated
GR09 Former Greenwich School of Management	05GR Former Greenwich School of Management	Allocated
GR10 Smiths Farm & Allendale	06GR Smiths Farm & Allendale	Allocated
<b>HANWELL</b>		
HA01 Ealing Hospital	01HA Land to the front of Ealing Hospital	Allocated
HA04 Gray's Garage	02HA Gray's Garage	Allocated
HA05 George Street Car Park	03HA George Street Car Park	Allocated
HA06 Site of Lidl and discount store	04HA Site of Lidl and discount store	Allocated
HA07 Marshall Site, Gold's Gym & Garages on Montague Avenue	05HA Marshall Site, Gold's Gym & Garages on Montague Avenue	Allocated

Former Site Reference & Name at Regulation 18	New Site Reference & Name at Regulation 19 (if allocated)	Status of site for Regulation 19 consultation
HA10 Tile Depot & Lambourn Close	06HA Tile Depot & Lambourn Close	Allocated
HA12 Copley Close Estate	07HA Copley Close Estate	Allocated
HA13 High Lane Housing Estate	08HA High Lane Housing Estate	Allocated
<b>NORTHOLT</b>		
NO01 Car sales site & Northolt Leisure Centre	01NO Car sales site & Northolt Leisure Centre	Allocated
NO02 Mandeville Parkway	02NO Mandeville Parkway	Allocated
NO04 Islip Manor Housing Estate	Not allocated	Not allocated
NO05 Northolt Sorting Office	03NO Northolt Sorting Office	Allocated
NO06 Northolt Driving Range	04NO Northolt Driving Range	Allocated
NO08 Medlar Farm Estate	05NO Medlar Farm Estate	Allocated
NO09 Yeading Lane I	06NO Yeading Lane I	Allocated
NO12 Yeading Lane II	07NO Yeading Lane II	Allocated
NO13 Grange Court	08NO Grange Court	Allocated
New Site - Kingdom Workshop	09NO Kingdom Workshop, Sharvel Lane	Allocated
NO15 West London Shooting Ground	Not allocated	Not allocated
New Call for Sites - Airways Estate	10NO Airways Estate	Allocated
<b>PERIVALE</b>		
PE01 Starvin' Marvin's & Garage	01PE BP Garage	Allocated
PE02 Land on the South Side of Western Avenue	02PE Land on the South Side of Western Avenue	Allocated
PE03 Alperton Lane North	03PE Alperton Lane North	Allocated
PE04 Alperton Lane South and Metroline Depot	04PE Alperton Lane South and Metroline Depot	Allocated
<b>SOUTHALL</b>		
SO01 Southall Crossrail Station and Gurdwara	01SO Southall Crossrail Station and Gurdwara	Allocated
SO02 Park Avenue	Not allocated	Not allocated
SO03 Southall Sidings	02SO Southall Sidings	Allocated
SO04 Former Sorting Office & Kings Hall Methodist Church	03SO Former Sorting Office & Kings Hall Methodist Church	Allocated
SO05 Southall West London College	04SO Southall West London College	Allocated
SO06 31-45 South Road & Telephone Exchange, Quality Foods & Iceland	05SO31-45 South Road & Telephone Exchange, Quality Foods & Iceland	Allocated



Former Site Reference & Name at Regulation 18	New Site Reference & Name at Regulation 19 (if allocated)	Status of site for Regulation 19 consultation
SO08 Fairlawn Hall	06SO Fairlawn Hall & Science of the Soul Centre	Allocated
SO10 The Limes, Maypole Court, Banqueting Centre, 13 – 19 The Green	07SO The Limes, Maypole Court, Banqueting Centre, 13 – 19 The Green	Allocated
SO11 Middlesex Business Centre	08SO Middlesex Business Centre	Allocated
SO12 Havelock Estate	09SO Havelock Estate	Allocated
SO13 The Green	10SO The Green	Allocated
SO14 The Green Quarter (Southall Gasworks)	11SO The Green Quarter (Southall Gasworks)	Allocated
SO15 Scotts Road Trading Estate	12SO Scotts Road Trading Estate	Allocated
SO16 Endsleigh Industrial Estate	13SO Endsleigh Industrial Estate	Allocated
SO17 Witley Works	14SO Witley Works	Allocated
SO18 Monorep Site	15SO Monorep Site	Allocated
SO19 Warren Farm	16SO Warren Farm	Allocated
SO20 Great Western Triangle Centre	17SO Great Western Triangle Centre	Allocated
SO23 Golf Links Estate	18SO Golf Links Estate	Allocated
SO24 Cranleigh Gardens Industrial Estate & Kingsbridge Crescent	19SO Cranleigh Gardens Industrial Estate & Kingsbridge Crescent	Allocated
SO26 Hambrough Tavern	20SO Hambrough Tavern	Allocated
<b>CALL FOR SITES</b>		
100 Gunnersbury Lane, Acton	Not allocated	Not allocated
33 Hanger Lane, Ealing	Added to 22EA	Allocated
4 Gladstone Road, Southall	Not allocated	Not allocated
Airways Estate, Northolt	10NO	Allocated
Goldsmiths' Allotments, Acton	Not allocated	Not allocated
Barratt Industrial Estate, Southall	Not allocated	Not allocated
Bell Industrial Estate, Acton	Not allocated	Not allocated
Betfred, Acton	Not allocated	Not allocated
Booker Wholesaler, Acton	Not allocated	Not allocated
Chiswick Park Station site 1 of 3, Acton	Not allocated	Not allocated
Chiswick Park Station site 2 of 3, Acton	Not allocated	Not allocated
Chiswick Park Station site 3 of 3, Acton	Not allocated	Not allocated

Former Site Reference & Name at Regulation 18	New Site Reference & Name at Regulation 19 (if allocated)	Status of site for Regulation 19 consultation
Dean Court, Acton	07AC	Allocated
Land South of Sharvel Lane, Northolt	Not allocated	Not allocated
Freshways & Hanovia House, Acton	Not allocated	Not allocated
Land adjacent to 1 Golden Manor, Hanwell	Not allocated	Not allocated
Land off Collett Way, Southall	Not allocated	Not allocated
Manhattan Business Park, Ealing	Not allocated	Not allocated
Metropolitan Park, Greenford	Not allocated	Not allocated
Oaktree Court, Acton	08AC	Allocated
Phoenix Trading Estate, Perivale	Not allocated	Not allocated
Selco site, Ealing	Not allocated	Not allocated
Shrubbery Road & High Street, Southall	Added to 06SO	Allocated
South Ealing Road alleyways (7 x no. sites)	Not allocated	Not allocated
Toplocks Estate, Southall	21SO	Allocated
TRS Estate, Southall	Not allocated	Not allocated

## 2.5 Stage 5: Inputting to Housing Evidence

Indicative capacity figures and broad phasing assumptions were established for Proposed Site Allocations that contained proposals for residential uses. This information fed into the process of establishing the overall housing supply position. The outcomes of the indicative capacity and phasing exercise for Regulation 19 is outlined in Chapter 3: Site Selection Methodology and below.

### 2.5.1 Capacity Assessments

Following Regulation 18 consultation, additional capacity work was undertaken to ascertain updated net figures for residential units and refined usage split for non-residential floorspace.

Each of the 82 Development Sites was assessed for its indicative capacity using the methodology set out in Chapter 3. Residential units (comprising a mix of flats and houses) and non-residential floorspace were determined based on the following:

- Site planning history
- Ealing Council capacity assessment tool
- Other evidence base documents – namely, site-specific feasibility studies and the Ealing Tall Buildings Guidance.

Indicative housing capacities have been assessed to inform the five-year housing land supply and the housing trajectory.

### 2.5.2 Indicative Timing for Delivery

An indication of expected delivery phasing is provided for each of the 82 Proposed Site Allocations, with sites apportioned between years 1-15. The following sources of information were drawn upon to inform estimations about expected phasing and delivery timeframes:

- Information provided through Early Call for Sites forms
- Information provided through Regulation 18 Call for Sites forms
- Information provided by landowners, developers and agents through Regulation 18 engagement
- Regulation 19 Deliverability Assessment
- Officer knowledge of the site/development plans

Typically, council officers assigned sites to the 'Within years 1-5' 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 5 years.

## 2.6 Site Allocations Map

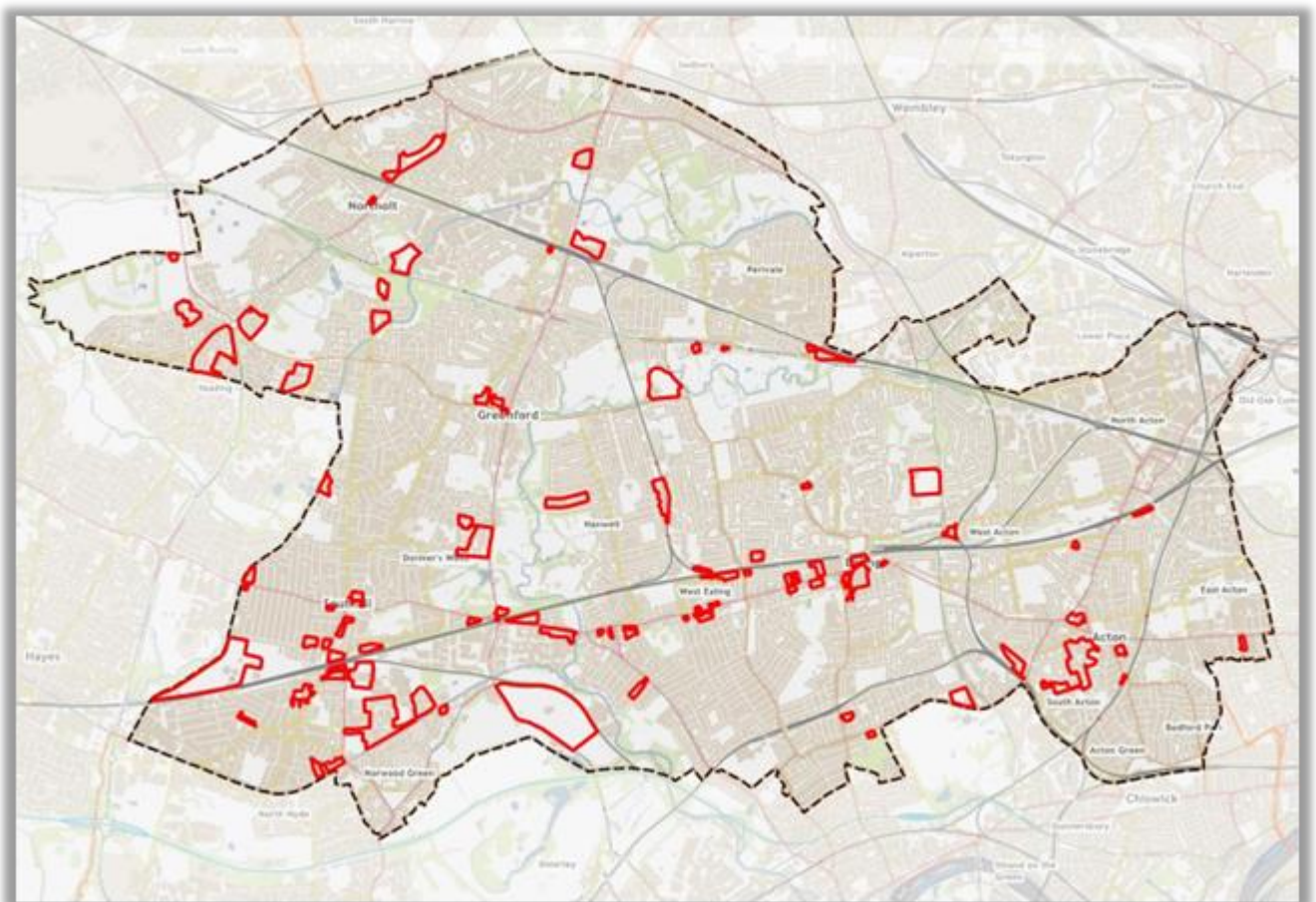


Figure 2.1: Map of Proposed Site Allocations at Regulation 19

Figure 2.1 shows the geographical distribution of the proposed site allocations. More detail can be found in the Local Plan, Reg 19 in each of the Town Plans in Chapter 4 here:

[Draft new Local Plan document \(Regulation 19\) | Ealing Council](#)

In addition, information can be found in an Interactive Policies Map here:

[Aurora \(ealing.gov.uk\)](#)

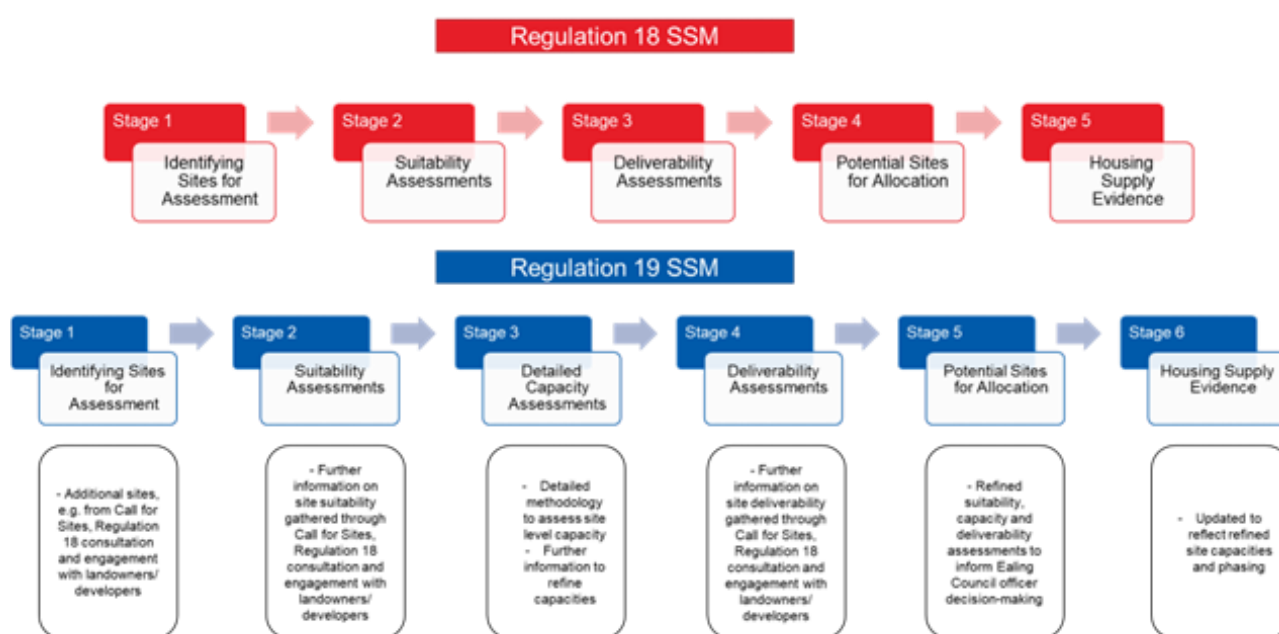
Links from each of the sites on the interactive policies map take you directly to the relevant Town Plan.

# 3. Site Selection Methodology

## 3.1 Methodology for Assessing Residential and Employment (including Mixed Use) Sites

The methodology for assessing sites for both Regulation 18 and 19 was undertaken in sequential stages as shown below in Figure 3.1.

Figure 3.1: Chronological Overview of Site Selection Methodology for Regs 18 and 19



## 3.2 Overview of Methodology for Assessing Residential and Employment (including Mixed Use) Sites at Regulation 19

Table 3.1 provides an overview of the SSM.

Table 3.1: Staged methodology for assessing residential and employment sites

Stage 1: Identifying Sites for Assessment	
Approach	Output for Regulation 19 stage
<ul style="list-style-type: none"> <li>The initial identification of sites to be assessed for the Regulation Stage 19 considered all sites put forward as proposed allocations in the Regulation 18 Local Plan and sites submitted through the Regulation 18 Call for Sites. An additional site was identified through the Gypsy and Traveller Pitch Provision and Site Assessment, which formed the evidence for a Regulation 18 consultation on an</li> </ul>	<ul style="list-style-type: none"> <li>Not applicable</li> </ul>

<p>Additional Site Allocation for Gypsy and Traveller Accommodation held in July and August 2023.</p> <ul style="list-style-type: none"> <li>• All sites put forward at Regulation 18 were reviewed by officers to determine whether they should proceed to assessment for inclusion in the Regulation 19 Plan.</li> <li>• Sites were discounted as a result of judgements made on the likelihood of coming forward for development within the Plan period. This was based on the suitability and deliverability assessments undertaken to date, new information and comments on sites gained through the Regulation 18 consultation, including from landowners, members of the public and statutory consultees, and updated information from council officers in other teams.</li> <li>• The sites taken forward for Regulation 19 assessment comprised all remaining sites identified from Regulation 18 and all the Call for Sites submitted excluding two duplicate sites.</li> </ul>	
<b>Stage 2 – Suitability Assessments</b>	
<b>Approach</b>	<b>Output for Regulation 19 stage</b>
<ul style="list-style-type: none"> <li>• At this stage, all 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).</li> <li>• The criteria used for this stage were the same as for Regulation 18 suitability assessments, using updated data where this was available (see Appendix C: Details of Suitability Assessment Criteria), information from the latest evidence base studies, and additional information received through the Regulation 18 consultation and further engagement with the developer community.</li> <li>• 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.</li> <li>• In making the ultimate decision around allocations for the Proposed Submission Local Plan (Regulation 19), council officers used their professional knowledge and judgement to consider site suitability in the round.</li> <li>• The 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.</li> <li>• The criteria assessments are presented through standardised scoring (green/amber/red). All sites were assessed through the same process and no sites were</li> </ul>	<ul style="list-style-type: none"> <li>• A comprehensive site suitability assessment proforma. Suitability summaries are provided setting out how future development may be impacted by identified constraints and mitigation that may be required.</li> </ul>

filtered out at this stage, including those awarded a high number of 'red' scores.

- The suitability assessment methodology can be found at para.3.3 below and the detailed suitability criteria and the scoring matrix can be found in Appendix C and Appendix E.
- The criteria were considered to be relevant for all proposed land uses (residential/ employment/ mixed use).

### Stage 3: Capacity Assessment

#### Step 1:

- Review of planning application information against site boundaries and update to site list (updated for Regulation 19). This involved a review of planning history for all sites via the council's intranet and GIS systems and engagement between strategic planning and development management planners. Where there were full or partial boundary overlaps between different applications, the latest planning records were used to extract capacity figures and use mix.
- In some instances, the planning review identified that portions of sites had been, were in the process of, or were close to being built. In such cases, site boundaries were amended to remove land under construction or entire sites were removed. In most cases, council-led approved schemes that were close to being built out were omitted, whilst sites in private ownership were typically retained as potential allocations due to less certainty around their permissions being implemented and works completed.
- In other instances, only part of a site was covered by an extent planning permission or by pre-application proposals. In the lack of any other capacity information (Steps 3 and 4), the remaining site area was taken through the Ealing capacity assessment tool (Step 7).
- In cases where extant planning permission or pre-application proposals were not deemed to accurately reflect the site's potential because of contextual considerations, other sources were checked (see Steps 3 and 4). Where these steps also provided no appropriate capacity information, sites were instead taken through the Ealing capacity assessment tool (Step 7).
- In all cases, any potential loss/replacement of existing homes (if any) was accounted for through the use of council GIS data pertaining to residential postal addresses to calculate net housing figures.

#### Step 2:

- Review of existing site capacity work commissioned by Ealing Council. Where sites had been subject to site capacity work commissioned by the council and the capacity figures were deemed to be appropriate, sites were not assessed using the Ealing capacity assessment tool. Such site capacity work includes site-specific feasibility studies and the Ealing Tall Buildings Strategy (2022) including related Appendices (2022) and Guidance for Study Sites (2024). Where this capacity information exists, it was incorporated into the capacity calculations.
- In some instances, portions of sites had been, were in the process of, or were close to being built out. In such cases, site boundaries were amended to remove land under construction or entire sites were removed.
- In all cases, any potential loss/replacement of existing homes (if any) was accounted for through the use of council GIS data pertaining to residential postal addresses to calculate net housing figures.

#### Step 3:

- Review of Call for Sites submission documents. For those sites put forward through Early or Regulation 18 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 Ealing capacity assessment tool.
- In all cases, any potential loss/replacement of existing homes (if any) was accounted for through the use of council GIS data pertaining to residential postal addresses to calculate net housing figures.

#### **Step 4:**

- Determine full list of sites to be assessed through the Ealing capacity assessment tool. Having completed Steps 1-3 to remove sites under construction and to identify sites with no or only partial relevant planning history, relevant capacity work or Call for Sites submission documents, a final list of sites was determined for assessment via the Ealing capacity tool.
- New for Regulation 19: The list of sites to be assessed through the Ealing capacity assessment tool included Potential Site Allocations and non-designated employment-led/masterplan sites that included LSIS. (See Step 6 for the methodology for calculating Small Sites).

#### **Step 5a:**

- Gathering baseline information on sites to assess them through the Ealing capacity assessment tool. The following information was either carried over from the Regulation 18 capacity assessment and updated or collected anew to calculate indicative capacity for Regulation 19:
  - Site areas – The same site areas assessed in the suitability assessment (using mapped GIS data) were used in the capacity assessments.
  - Site constraints for residential-led and mixed-use sites (new for Regulation 19) – At Regulation 18, site constraints were deducted from site areas through a judgement about the type of potential development (full redevelopment, partial redevelopment or infill) which resulted in a notional reduction in the overall site area. At Regulation 19 stage, a more thorough review of site constraints was carried out using GIS mapped data collected for the Regulation 19 suitability site assessment (see Section 3.3.1 for list of criteria). A site-by-site review of this mapped GIS data was carried out and key site constraints were deducted from site areas to determine a developable area calculation. These key constraints included indicative easements for railway and utility, root protection zones for areas of mature trees or landscaping, access routes and existing buildings to be retained.
  - Site constraints for employment-led development sites (new for Regulation 19) – Given the scale and complexity of existing employment sites and the council's Policy E4 and E5 requiring employment land to first be tested for residential release, it was determined that developable area would be calculated as 20% of site area for potential mixed-use development on employment-led sites such as LSIS.
  - Net developable area – Calculation of site area minus area of deducted site-specific site constraints.
  - Building footprint for residential-led and mixed-use sites – It was determined that 80% of Net Developable Area would be assumed as indicative building footprint reflecting a reasonable design assumption about the amount of external space required for movement within the site, building setbacks, parking, and landscaping on residential-led sites.



- Building footprint for employment-led development (new for Regulation 19) - It was determined that 60% of Net Developable Area would be assumed as indicative building footprint reflecting a reasonable design assumption about the amount of external space required for movement within the site, building setbacks, parking and landscaping on employment-led sites.
- Prevailing heights – At Regulation 18, the assessment tool drew on data collected as part of the Ealing Characterisation Study (Allies and Morrison, 2022) to determine suitable storey heights. To further support London Plan Policy D3 approach for character-led growth (i.e. growth sensitive to local context), a further site-by-site review was undertaken at Regulation 19 and a desktop analysis of sites against emerging planning applications was undertaken. Prevailing storey heights were then multiplied by the building footprint to provide total Gross External Area (GEA).
- Gross Internal Area (GIA) - Calculated as a proportion (90%) of GEA to account for external wall build ups.

#### **Step 5b:**

- Assessing sites through the Ealing capacity assessment tool.
  - Mix of uses – GIA was then subdivided as a percentage split (%) between residential (house or flatted development) and employment uses. The percentage split of uses was made as a high-level judgement in officer workshops based on information and feedback received from landowners, agents and developers through Regulation 18 consultation and Call for Sites forms.
  - Net Internal Area (NIA) (new for Regulation 19) – Calculated as a proportion of GIA to account for internal circulation, wall build-ups and ancillary spaces in residential buildings. At Regulation 19, the approach to calculating NIA for residential buildings was revised to reflect different residential typologies, specifically houses and flatted development. NIA for houses was calculated as 90% of GIA and NIA for flatted development was calculated as 75%. NIA was not calculated for employment uses following industry convention that calculates employment land by area as opposed to unit/dwelling numbers (see next step).
  - Calculating residential dwellings/units – combination of 1 bed, 2 bed and 3 bed flats and 3 bed and 4 bed houses calculated using Nationally Described Space Standards. Accommodation mix and type reviewed on a site-by-site basis, using accommodation mix compliant with Ealing’s Local Housing Needs Assessment.

#### **Step 5c:**

- Assessing sites through the Ealing capacity assessment tool:
  - Gross vs. Net residential unit figures – Any potential loss/replacement of existing homes (if any) was accounted for through the use of council GIS data pertaining to residential postal addresses. These figures were deducted from the gross number of residential units calculated to deduce final net figures of indicative new residential units that fed into the 5-Year Housing Land Supply.
  - Density tool for residential and mixed-use development – projected housing numbers were cross checked against GLA design guidance (measured by dwellings per hectare)
  - Gross vs Net employment areas – Approximate areas of existing employment land were calculated in GIS mapping data and deducted from the gross area of employment uses calculated to deduce a final net figure of indicative employment-led development.
  - Density tool for checking employment-led development –projected amount of development (mixed use) checked against Government design guidance (measured by plot ratio)

- Determining a small sites input:
  - Whilst residential capacity estimates were also calculated individually for each small site employing the same methodology detailed in steps 1 to 5 above, for the purpose of inputting into the 5 YHLS and Housing Trajectory, these individual site estimates were substituted instead with an aggregated small sites figure taken as a windfall component.
  - This approach to dealing with small sites as a windfall is consistent with advice contained in the NPPF/NPPG and also the approach taken regionally when setting the housing requirement targets as underpinned by the SHLAA. The SHLAA calculated the deliverable capacity from this source through a hybrid approach of forecasting and modelling. The London Plan indicates that it considers the SHLAA evidence and small sites target to amount to a reliable source of windfall for the purpose of estimating supply.
  - Reflecting the London Plan target and SHLAA a fixed annual figure of 424 units has been used for the small sites input.

Stage 4: Deliverability Assessments	
Approach	Output for Regulation 19 stage
<ul style="list-style-type: none"> <li>• Full deliverability assessments were completed at this stage to assess sites against the list of deliverability criteria (including availability and achievability) outlined in Appendix D.</li> <li>• The PPG<sup>11</sup> sets out that sites can be considered available where there is confidence that there are no legal or ownership impediments to development.</li> <li>• The PPG<sup>12</sup> 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.</li> <li>• Every site taken through the Stage 2 Suitability Assessment underwent a deliverability assessment to review each site’s potential to accommodate residential/employment/mixed use development.</li> <li>• Site Proformas were produced for each site that outline the combined results of the suitability and deliverability assessments. These can be found in Appendix E.</li> <li>• Noting the PPG’s description of achievability/economic viability<sup>13</sup>, feedback submitted by landowners, developers and site agents via the Regulation 18 engagement and Call for Sites processes was integral to the assessment of site deliverability. In the lack of engagement feedback submitted landowner/developer/site agent feedback, a professional judgement was made on the achievability/economic viability of a site based on officers’ collective knowledge of sites.</li> <li>• Details of when Regulation 18 engagement feedback was incorporated into the assessment of deliverability criteria can be found in Appendix D.</li> <li>• As with the suitability assessments, the criteria used to assess the deliverability of sites were not ranked in importance. However, it was agreed that deliverability assessment results held more weight than the suitability assessments results and</li> </ul>	<ul style="list-style-type: none"> <li>• A comprehensive site deliverability assessment proforma. Deliverability summaries are provided setting out how future development may be impacted by identified constraints and mitigation that may be required.</li> </ul>

<p>Deliverability Assessment Summaries were included on each Site Proforma.</p> <ul style="list-style-type: none"> <li>• In making the ultimate decision about Site Allocations for the Proposed Submission Local Plan (Regulation 19), the deliverability of sites was considered on balance, using a collection of Regulation 18 feedback, Call for Sites feedback, professional knowledge and judgement.</li> <li>• The assessments include both quantitative (e.g. using datasets / GIS shapefiles etc.) and qualitative (e.g. using Regulation 18 engagement feedback, professional judgement) analysis.</li> <li>• These criteria assessments are presented through standardised scoring (green/amber/red).</li> <li>• Sites assessed with a high number of ‘red’ rankings were filtered out at this stage.</li> <li>• The detailed deliverability assessment methodology and the scoring matrix can be found in Chapter 3.3.3. The criteria were considered to be relevant for all proposed land uses (residential/ employment, including mixed use).</li> <li>• All deliverability criteria proposed to be used at this stage of the assessment by the Regulation 18 Site Selection Report, 2022 were still agreed to be relevant, proportionate and necessary to assess site deliverability for Regulation 19 with the exception of two criteria: <ul style="list-style-type: none"> <li>○ On-site physical infrastructural constraints were omitted as a deliverability criterion owing to its duplication in the Stage 2 Suitability Assessment, and;</li> <li>○ The GIS data used in the qualitative assessment of assessing the impact of Safeguarded alternative uses was revised to omit data relating to the Heathrow Safeguarding air zone, HS2 Safeguarding and Crossrail Safeguarding zones.</li> </ul> </li> </ul>	
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**Stage 5 – Identifying Potential Sites for Allocation (Development Sites)**

<b>Approach</b>	<b>Output for Regulation 19 stage</b>
<ul style="list-style-type: none"> <li>• This stage involved a final review of the remaining sites to identify which should progress through to the Regulation 19 Proposed Submission Local Plan as potential site allocations (‘Development Sites’).</li> <li>• Consideration was given to whether any logical adjustments should be made to site boundaries to create combined sites and/or amend overlapping sites.</li> </ul>	<ul style="list-style-type: none"> <li>• Portfolio of Development Sites for Regulation 19 consultation– residential and employment (including mixed use).</li> </ul>

**Stage 6 – Inputting to Housing Evidence**

<b>Approach</b>	<b>Output for Regulation 19 stage</b>
<ul style="list-style-type: none"> <li>• 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 3.3.2 below. The high-level capacity exercise at this stage is to inform the Council’s</li> </ul>	<ul style="list-style-type: none"> <li>• Indicative number of homes (and phasing) to inform the 5YHLS and</li> </ul>

<p>Housing Supply Topic Paper and ongoing preparation of the 5 Year Housing Land Supply (5YHLS) and housing trajectory.</p> <ul style="list-style-type: none"> <li>The Regulation 18 consultation provided 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.</li> </ul>	<p>the Housing Trajectory</p>
<ul style="list-style-type: none"> <li>The PPG<sup>14</sup> 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.</li> <li>Further detailed capacity work that was undertaken is explained in Section 3.3.2 below.</li> </ul>	

### 3.3 Detailed Methodology

#### 3.3.1 Stage 2 Suitability Assessment

Arup was commissioned to undertake the suitability assessment as part of the wider Regulation 19 site selection process led by Ealing Council.

A total of 114 potential sites for allocation in the Regulation 19 Local Plan (Development Sites) were assessed for their suitability.

The Planning Practice Guidance (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. The suitability assessments for each identified site 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.

#### 3.3.2 Updated suitability assessment for Regulation 19

In the Regulation 18 Site Selection Report, a series of suitability assessment criteria that accounted for varying constraints was devised. The assessment criteria were informed by constraints identified in the PPG<sup>15</sup>, 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 and relevant set of constraints for the purposes of assessing site suitability, in line with the NPPF<sup>16</sup> requirement for this to be the starting point for decision making.

To ensure continuity with the Regulation 18 site selection process, a very similar approach has been adopted for the Regulation 19 suitability assessment, however assessments differed as follows:

- Data sources relating to site constraints were reviewed, validated by Ealing Council and updated in the assessments as required.
- Updated and new evidence base documents were reviewed, including the Level 2 Strategic Flood Risk Assessment (SFRA), Green Belt and MOL Review Stage 2, February 2024 and Tall Buildings Strategy, February 2024, to ensure site constraints were accurately reflected.
- Emerging Regulation 19 Local Plan policies were reviewed, to ensure sites were assessed in line with the council's emerging spatial strategy and policy direction
- Site suitability assessments took into account additional information received through the Regulation 18 consultation and Call for Sites submissions.
- A new criterion was included considering impact on Green Belt / MOL
- Some assessment scoring criteria have been refined for the Regulation 19 assessment, taking into account latest evidence, emerging policy and availability of information on future site proposals. This includes the Health and Safety assessment which now considers impact of sites with potential for tall buildings on air safety. The Spatial Characteristics assessment (previously Local Plan Spatial Development Pattern) was also refined so that the wording is better aligned with the updated spatial strategy for Regulation 19. The scoring approach for the Biodiversity and Impact on Provision of Open Space assessments has been updated to reflect the availability of information on future site proposals.

As such, sites that had been previously assessed through the Regulation 18 Site Selection process were assessed again to account for potential changes in assessment scoring criteria and data, emerging policies and evidence base documents, as well as new information received through the Regulation 18 consultation.

Each of the criterion included for the Regulation 19 suitability assessment were agreed to be relevant, proportionate and necessary in order to assess site suitability for development. All sites were assessed using a combination of quantitative and qualitative methods, alongside the professional judgement of Ealing Council officers, and Arup specialists, to identify their site characteristics and constraints for residential-led<sup>17</sup> (including mixed use) development.

Each criterion used to assess the suitability of sites was afforded equal importance. It is important to note that while a (red/ amber/ green or '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 Regulation 19 Local Plan.

All sites were assessed through the same process and no sites were filtered out at the suitability stage, including those awarded a high number of 'red' scores. In making the ultimate decisions around allocations for the Proposed Submission Local Plan (Regulation 19), council officers used their professional knowledge and judgement to consider site suitability in the round, alongside capacity and deliverability considerations and the wider Local Plan evidence base.

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.

Table 3.2 below lists the suitability assessment criteria used to assess sites for Regulation 19. Appendix C contains detailed descriptions of the suitability assessment criteria used for Regulation 19, including information on which data sources have been updated since Regulation 18 suitability assessments.

**Table 3.2: Summary of Suitability Criteria for Regulation 19:**

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
Spatial Characteristics
Accessibility - PTAL
Vehicular access to the site
Impact on Green Belt or Metropolitan Open Land
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

### 3.3.3 Stage 3: Calculating Indicative Capacity for Regulation 19

Following the Stage 2 suitability assessment, 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. Residential capacity has been calculated as an aggregated net figure of indicative homes to provide an indication of what could be delivered in the first five years and beyond the first five years. Residential figures were calculated for all Proposed Site Allocations as well as for 'Windfall Sites' including non-designated employment-led sites (such as LSIS sites) and Small Sites (sites below 0.25 hectares).

The London Plan (2021) supports a design-led approach to development. Following Regulation 18 consultation, the Greater London Authority published guidance on optimising site capacity that outlines how Policy D3 of the London Plan should inform the assessment of development capacity. Following publication of Regulation 18 Draft Local Plan, the council reviewed its approach to calculating development capacity (for residential and employment-led sites) and updated its Excel-based capacity assessment tool to address the GLA’s design-led guidance.

The following sources of information also informed the capacity assessment and Stage 3: Capacity Assessment in Table 3.1 above outlines the stepped approach implemented to calculate capacity figures with a focus on residential capacity:

- Planning application information including pre-application and submitted applications (updated at Regulation 19)
- Site capacity work commissioned by the council (updated at Regulation 19)
- Early Call for Sites (as Regulation 18)
- Regulation 18 Call for Sites (new for Regulation 19)

### 3.3.3 Stage 4: Deliverability Assessments

The Planning Policy Guidance (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.

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

The deliverability assessments at Regulation 18 stage comprised:

<b>Deliverability Criteria:</b>
<b>Availability:</b>
Safeguarded alternative uses
On-site restrictions

For Regulation 19, the assessment of site deliverability used additional criteria to the two criteria above (Safeguarded alternative uses and On-site restrictions) employed for Regulation 18 assessment.

The additional criteria for this stage assessed both the Availability and Achievability of sites. In summary, the additional deliverability assessments at Regulation 19 stage comprised:

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



## 4. Next Steps

This Site Selection Report has been prepared to support the Regulation 19 Plan. It sets out the methodology and the process used by the council to help identify and assess potential site allocations.

The Regulation 19 public and stakeholder consultation will commence from 28<sup>th</sup> February 2024, and will run for 6 weeks closing on 10<sup>th</sup> April 2024. All representations will be carefully assessed and the Local Plan, supporting evidence base together with a statement of consultation (setting out any representations received during Regulation 19 and the council's response to them) will be submitted to the Secretary of State for examination in public.

The examination will provide a further opportunity for evidence to be evaluated at the discretion of the independent inspector.

Subject to any agreed modifications and a satisfactory report by the inspector as to legal compliance and soundness, the Local Plan will then be considered for formal adoption by Ealing's Full Council.

