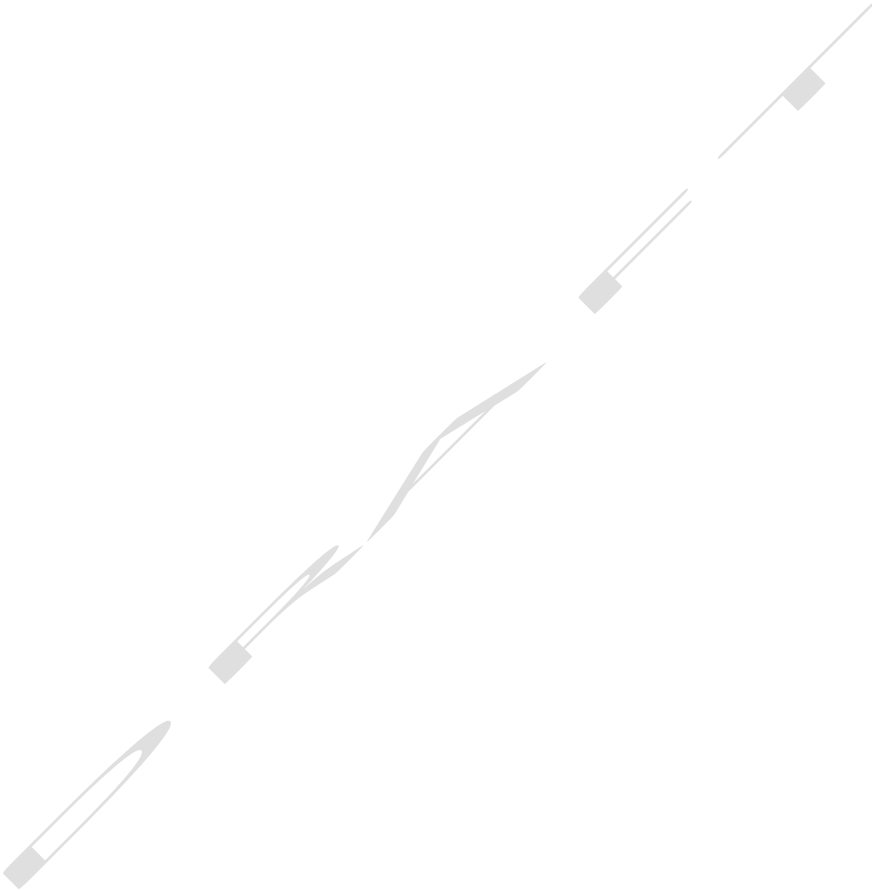


APPENDICES

Regulation 19 Site Selection Report,
January 2024



Appendix A:

Planning Policy and Guidance

National Planning Policy Framework (NPPF)

Plan-making

The NPPF¹ states that “succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities,” (Paragraph 15) with the aim of being “prepared positively, in a way that is aspirational but deliverable” (Paragraph 16). Strategic policies must make sufficient provision for housing...employment, retail, leisure and other commercial development (Paragraph 20), and must look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities (Paragraph 22), which must include planning for, and allocating sufficient sites to deliver the strategic priorities of the area (Paragraph 23).

Delivering a sufficient supply of homes

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

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

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

Deliverable:

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

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

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

¹ Available at: [National Planning Policy Framework- GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/426623/National-Planning-Policy-Framework-2019.pdf)

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

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

Developable:

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

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

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

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

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

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

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

Making effective use of land

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

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

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

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

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

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

Green Belt land

The NPPF places great importance on Green Belt land, with the fundamental aim being to prevent urban sprawl through keeping land permanently open (Paragraph 137), and once established, Green Belt boundaries should only be altered when exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans (Paragraph 140). Before demonstrating these exceptional circumstances, the strategic policy-making authorities should be able to demonstrate that it has "examined fully all other reasonable options for meeting its identified need

for development”, through ensuring that the strategy makes as much use as possible of suitable brownfield sites and underutilised land, ensuring the optimisation of density of development in town centre and city centres as well as other locations well served by public transport, and through discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground (Paragraph 141).

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

Planning and flood risk

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

Conserving and enhancing the natural environment and heritage assets

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

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

Further guidance relevant to the site selection process

Planning Practice Guidance (PPG) on Housing Supply and Delivery (Reference ID: 68-004-20190722) states that in plan-making, strategic policies should identify a 5-year housing land supply from the intended date of adoption of the plan, and that for decision making purposes, an authority will need to demonstrate this when dealing with applications and appeals. PPG states that this can be done one of two ways:

Using the latest available evidence, such as a Strategic Housing Land Availability Assessment (SHLAA), Housing and Economic Land Availability Assessment (HELAA), or an Authority Monitoring Report (AMR); or

Confirming the 5-year land supply using a recently adopted plan or through a subsequent annual position statement.

The PPG on Housing and Economic Land Availability Assessment (Reference ID: 3-005-20190722) is useful guidance in setting out how local planning authorities should determine the suitability, availability and achievability of land for development. The guidance sets out a staged approach of five steps through a flow diagram (see Figure A1 below).

The five steps are:

Stage 1 – Site / Broad Location Identification

Stage 2 – Site / Broad Location Assessment

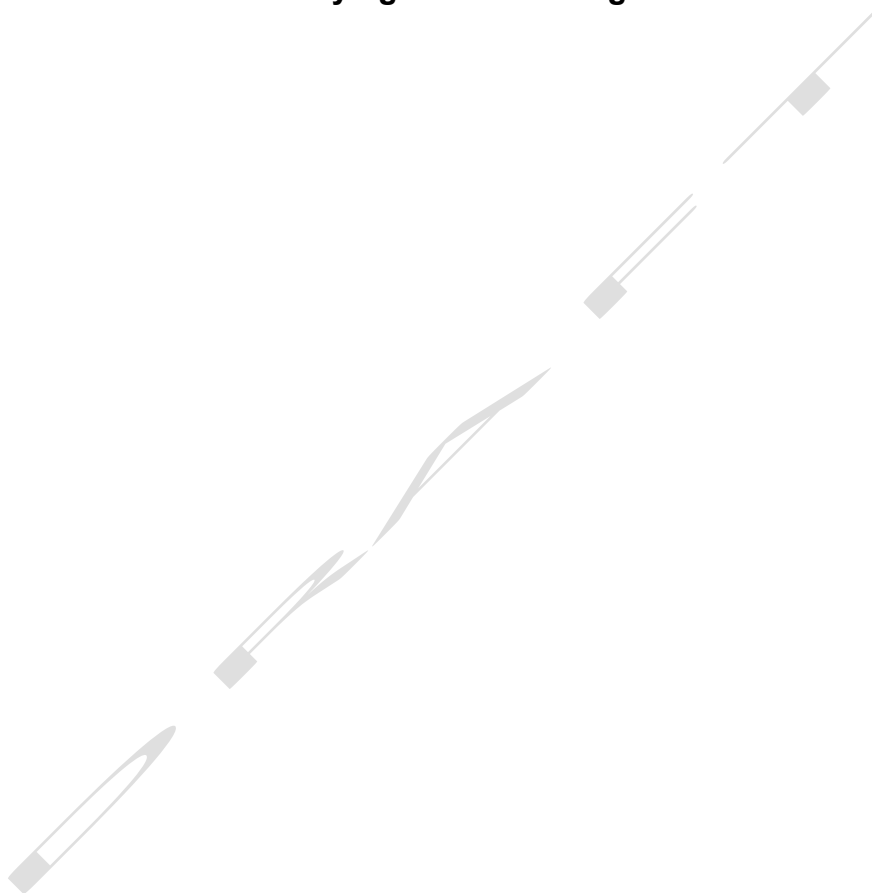
Stage 3 – Windfall Assessment

Stage 4 – Assessment Review

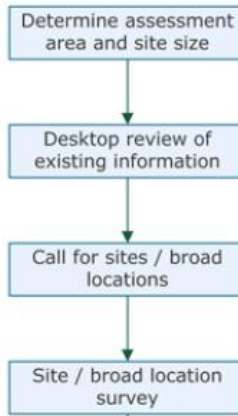
Stage 5 – Final Evidence Base

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

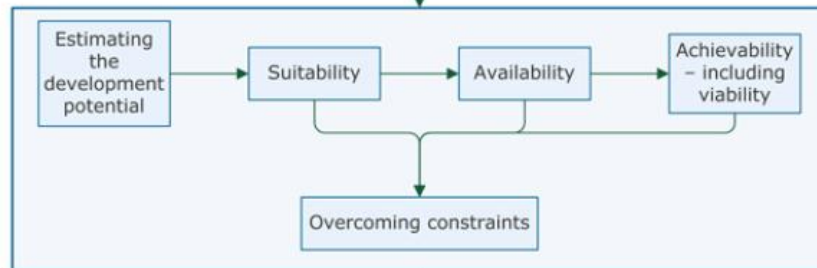
Figure A1: PPG method for identifying and assessing sites



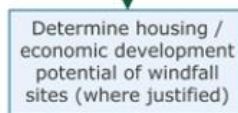
Stage 1 - Site / broad location identification



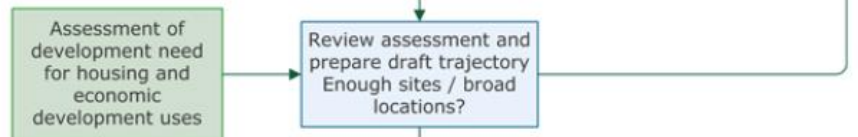
Stage 2 - Site / broad location assessment



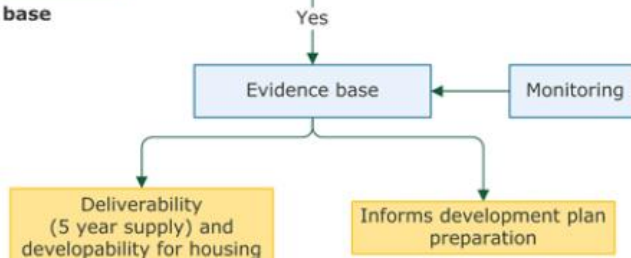
Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base



The London Plan

As well as conforming to the policies and guidance set out within the NPPF and PPG, the SSM must also adhere to policies included within the London Plan (2021)².

Housing

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

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

Small sites

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

Site capacity

The London Plan states the need to define an area's character to understand its capacity for growth, through undertaking assessments to define its characteristics, qualities and values including; demographic make-up, socio-economic data, housing types and tenure, urban form and structure, existing and planned transport networks, air quality and noise levels, open space, heritage assets, topography and hydrology, land availability, existing development plan designations, land uses and views and landmarks (Policy D1). These characteristics should enable the identification of suitable locations for growth, as well as scale of growth. Policy D2 of the London Plan states that the density of development proposals should be linked to future planned levels of infrastructure and be proportionate to the site's connectivity and accessibility by walking, cycling and public transport to jobs and services.

The London Plan also recognises the importance of optimising site capacity through defining an area's 'design-led approach' (Policy D3) which differs from the previous density matrix. This design-led approach places greater value on ensuring the optimisation of site capacity based on the site's context and capacity for growth, and existing and planned supporting infrastructure capacity, with support for higher density developments generally being promoted in locations that

² Available at: [The London Plan 2021 | LGOV](#)

are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. The design-led approach also states that where existing sites have areas of high-density buildings, expansion of these areas should be positively considered where appropriate, including through expanding Opportunity Area boundaries.

The Draft Optimising Site Capacity: A Design-led Approach guidance³ (consultation February - March 2022 and due for publication later 2022) sets out how the design-led approach, set out in Policy D3 should be applied. This approach is the process of setting site-specific design parameters and codes for development sites to provide clarity over the future design. It should be used to determine the most appropriate form of development on a site.

Employment

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

Industrial sites

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

The GLA's assessment states that after factoring in both the positive net land demands and the management of vacancy rates, there would be scope to release a further 233 hectares of industrial land across London over the period of 2016 to 2041. However, the demand assessment also shows that in 2015, 185 hectares of industrial land already had planning permission to change to non-industrial use, and a further 653 hectares were earmarked for potential release in Opportunity Area Planning Frameworks, Local Plans and Housing Zones. Therefore, the London Plan addresses the need to provide sufficient industrial, logistics and related capacity through its policies, and states that where possible, all boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence.

The London Industrial Land Demand Study⁴ (LILDS, 2017) which underpins the London Plan classifies Ealing as 'Provide capacity'⁵ borough based on a net demand projection of 35.6 hectares of industrial land over the period 2016 to 2041.

Policy E7 of the London Plan encourages boroughs to explore the potential to intensify industrial activities on industrial land to deliver additional capacity and to consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential and other uses. The Policy also states that there may be scope for selected parts of SILs or LSISs to

³ Available at: [Optimising Site Capacity: A Design-led Approach LPG | LGOV \(london.gov.uk\)](https://www.london.gov.uk/sites/default/files/optimising_site_capacity_a_design_led_approach_lpg_lgov_london.gov.uk)

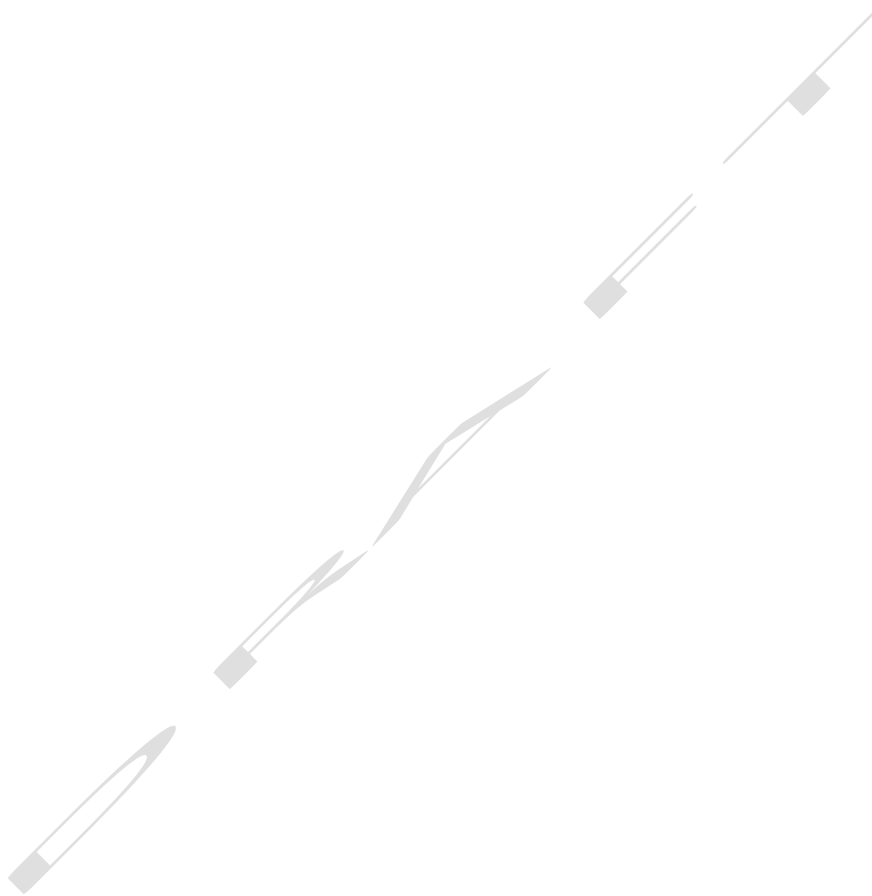
⁴ Available at: https://www.london.gov.uk/sites/default/files/london_industrial_land_demand_study_2017_commissioned_by_the_gla.pdf

⁵ Provide Capacity – where Boroughs are experiencing positive net demand for industrial land and should seek some way to accommodate that demand

be consolidated or appropriately substituted. This should be done through a carefully co-ordinated plan-led approach to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the release of some land for a mix of uses including residential.

Summary

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



Appendix B:

Evidence from studies relevant to site selection

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

London Strategic Housing Market Assessment (SHMA) (2017)

The London Plan identified, through a Strategic Housing Market Assessment (2017) that London requires 66,000 homes to be delivered per annum to ensure the needs of the population are met.⁶

London Strategic Housing Land Availability Assessment (SHLAA) (2017)

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

The London SHLAA provides one of the sources of sites for the SSM; however, given the time that has passed since this was undertaken, Ealing Council's officers have selected preferred sites based on up-to-date site knowledge and context. Further, it should be noted that the SHLAA is not a site allocation exercise in itself. It is instead designed to give an indication of aggregated housing capacity.

The SHLAA's constraints-based approach recognises that not all potential sites identified in the assessment will come forward for housing. Therefore, the SHLAA acts as a starting point for the site allocation process, rather than determining what is allocated.

London Borough of Ealing Strategic Housing Market Assessment Update (2018)

Opinion Research Services (ORS) was commissioned by the West London Housing Partnership to prepare a Strategic Housing Market Assessment (SHMA) for the area, and for each of its constituent planning bodies. The West London Housing Partnership comprises the London Boroughs of Barnet, Brent, Ealing, Hammersmith & Fulham, Harrow, Hillingdon, Hounslow and the Old Oak and Park Royal Development Corporation. It considers the needs of Ealing as a separate planning authority⁷ and the results are then aggregated with the remaining planning authorities across West London to form a sub-regional SHMA as a separate document. The Report includes summarises the Full Objectively Assessed Need for Housing across Ealing, including a 20% response for market signals and 1.2% vacancy and second home rate (see Figure B1 below):

⁶ Available at: https://www.london.gov.uk/sites/default/files/2017_london_strategic_housing_land_availability_assessment.pdf

⁷ Available at: [Ealing Strategic Housing Market Assessment | Ealing Council](#)

Figure B1: Extract from LBE SHMA Update

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

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

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

The SHMA established the balance between the need for market housing and the need for affordable housing. This analysis identified a need to increase the overall housing need by 2,144 households to take account of concealed families and homeless households that would not be captured by the household projections. The housing mix analysis identified a need to provide 18,100 additional affordable dwellings over the 25-year period 2016-41 (an average of 724 per year), representing 36.1% of the OAN for Ealing. This would provide for the current unmet needs for affordable housing in addition to the projected future growth in affordable housing need but assumes that the level of housing benefit support provided to households living in the private rented sector remains constant.

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

The impact of an ageing population will see more older single persons and couples. The majority of these households are already occupying dwellings in Ealing and the majority will not wish to downsize from the family size homes they currently occupy;

The largest growth in projected households is for couples without dependent children, with the main growth being in households aged 55+, again the majority will not wish to downsize from the family size homes they currently occupy; and

Other households include multi-generation households and also those who occupy Houses in Multiple Occupation. These households would typically require at least 3 bedrooms in their property.

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

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

West London Employment Land Evidence (2019) and update (2022)

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

The West London Employment Land Evidence Report⁸ (West London Alliance) categorises Ealing as a 'provide capacity' borough, alongside Brent, as it is a borough where strategic demand for industrial, logistics and related uses is anticipated to be the strongest. It states that Ealing should seek to deliver intensified floorspace capacity in either existing and/or new locations, accessible to the strategic road network, and in locations with potential for transport of goods by rail / water.

The Report states that Ealing's requirements are driven by significant B8 demand, from logistics (primarily wholesaling but also warehousing), but that falls in manufacturing generally mitigate the overall need (see Figure B2). The degree to which manufacturing sites are likely to be suitable for future logistics needs is considered separately in the study.

⁸ Available at: https://www.ealing.gov.uk/downloads/download/6596/wl_employment_land_evidence_report

Figure B2: Extract from the West London Employment Land Evidence ‘Table 71’

Table 71: Ealing industrial land needs (ha)

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

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

The Report states that requirements are generated by borough boundary therefore there is no disaggregation for OPDC between Ealing and Brent. Consideration for the apportionment of needs should take into account that approximately 35% of each borough’s industrial floorspace is located in OPDC and that Park Royal is the single largest estate in the study area with a commensurate level of demand (see Figure B3).

Figure B3: Extract from the West London Employment Land Evidence: ‘Table 80’

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

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

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

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

The West London Employment Land Evidence Report (2019) concluded that there is a net deficit of industrial provision of 1ha. In 2021/22 the West London Employment Land Review⁹ was undertaken and concluded that for Ealing there is clear evidence that for the foreseeable future the levels of strong demand will continue as the borough remains a desirable occupier location with good access, an industrial land pool and access to target populations. It states that employment growth in this sector in recent years has been strong and the leasing and GVA growth outlook is very strong for wholesaling and warehousing, casting doubt on any slowdown in location-based activity and employment. Furthermore, demand is acute and the protection of space and provision of new premises is essential, whilst the upgrading of older stock is desirable.

⁹ Available at: [West London Employment Land Review | Ealing Council](#)

Overall, it was concluded that it is critical that in Ealing as much functional industrial floorspace as possible is retained and upgraded; and there is a need to deliver additional floorspace where feasible in line with the conclusions of the 2019 study.

Preferred Spatial Option Report

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

Integrated Impact Assessment

An Integrated Impact Assessment (IIA) has been undertaken. The IIA process has involved the assessment of the emerging spatial options, policies and site allocations that form the Regulation 19 Local Plan to promote sustainable development, health and equality through better integration of social, environmental and economic considerations.

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

Strategic Flood Risk Assessment

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

A Level 2 SFRA (Site Specific Sequential and Exception Test) was also undertaken following the completion of Regulation 18 consultation once the final list of potential site allocations was confirmed.

Ealing Character Study, Housing Design Guide and Tall Buildings Strategy

Ealing Council have published an Ealing Character Study, Housing Design Guide and Tall Buildings Strategy plus Appendix: Guide for Study Sites (Allies and Morrison, 2022)¹⁰ as part of the evidence base for its emerging Local Plan, to form a robust basis for a plan-led growth strategy across Ealing borough. The Character Study is split into two parts:

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

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

The Tall Buildings Strategy was further revised including guidance for an expanded number of study sites in December 2023.

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

Green Belt and Metropolitan Open Land Review

The Council has undertaken a Green Belt (GB) and Metropolitan Open Land (MOL) Review Stage 1 Report (November 2022) for Regulation 18 consultation. This provided a baseline review of GB and MOL sites and an assessment of their contribution towards the criteria / objectives of their designation.

But the results of the Regulation 18 Local Plan consultation showed that many respondents were strongly opposed to the recommendations of the Stage 1 GB/MOL Review, concerned that the approach would lead to a weakening of protection of local parks / allotments, even though the aim was to ensure the correct protections were in place. The GLA also opposed the recommendations of the Stage 1 GB/MOL Review as a matter of principle.

The council has decided not to proceed with its recommendations regarding changes to GB and MOL designations. Instead, it was decided that we will only proceed with our recommendations for specific GB and/or MOL boundary corrections to ensure GB and MOL boundaries are up-to-date, correct, and defensible, and for a small number of sites (or parts of sites) that do not contribute towards Green Belt/MOL objectives, and which could be used to meet identified development needs and thus are identified for change in designation, demonstrating the corresponding exceptional circumstances. This approach is consistent with the latest version of the NPPF which states that: "Authorities may choose to review and alter green belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process."

The Green Belt and Metropolitan Open Land Review Stage 2 report therefore outlines the proposed GB/MOL boundary corrections. These boundary corrections reflect the current reality and use of sites. Ensuring GB and MOL sites have correct, up-to-date, and defensible

¹⁰ The Character Study Parts 1 and 2 reports and the Housing Design Guide were published in January 2022. Available here: [Ealing character studies | Ealing Council](#) The Tall Buildings Strategy and Appendix: Guide for Study Sites will be published as part of the evidence base for the Regulation 18 Local Plan.

boundaries is important as incorrect boundaries can undermine the integrity of the wider GB or MOL parcel.

In addition, a small number of Green Belt and MOL boundary changes are proposed where a site has been identified for development and allocated in the new Local Plan. In these cases, the exceptional circumstances necessitating the change in designation are presented. These included the limited release of GB/MOL to meet unmet need – firstly for recreation uses, but also potentially for housing, employment land, social infrastructure, or Gypsy and Traveller accommodation.

The Stage 2 Review was undertaken in parallel with the SSM and therefore the results have informed the preferred site assessments.

Gypsy and traveller pitch provision

Three Dragons was commissioned by London Borough of Ealing (LB Ealing) in February 2023 to provide advice on the delivery of Gypsy and Travellers (G&T) pitches, in order to identify sites required to meet accommodation needs in the Borough. The work draws upon the needs assessment set out in the 2018 West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA). The identified 'planning' need within the plan period is for an additional 6 pitches. The report was published in June 2023.

A separate Regulation 18 public and stakeholder consultation was subsequently carried out specifically into this matter. Two sites were consulted upon. Following careful assessment of any representations and further analysis of the site constraints and opportunities, one site was carried forward into Regulation 19 – The Kingdom Workshop, Sharvel Lane, Northolt. The results are included in Appendix E.

Appendix C:

Details of suitability criteria

The following sets out details of each suitability criteria as well as the approach used to scoring the sites for Ealing's Regulation 19 Local Plan.

List of Suitability Criteria (Regulation 19):

Suitability Criteria
A1.1 Flooding - fluvial / tidal and surface water
A1.2 Heritage
A1.3 Air quality
A1.4 Health and safety
A1.5 Biodiversity
A1.6 Geodiversity
A1.7 Tree Preservation Order
A1.8 Brownfield vs Greenfield Land
A1.9 Contamination
A1.10 Employment – industrial designated and non-designated land
A1.11 Spatial Characteristics
A1.12 Accessibility - PTAL
A1.13 Vehicular access to the site
A1.14 Impact on Green Belt or Metropolitan Open Land
A1.15 Impact on provision of open space
A1.16 Access to open space
A1.17 Distance to nearest infant/primary school
A1.18 Distance to nearest secondary school
A1.19 Distance to nearest GP surgery

The scoring criteria for each of the suitability criteria is set out below:

A.1.1 Flooding - fluvial / tidal and surface water

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

Data for assessment

Data used for assessment	Data Source	Data update from Reg.18?
Flood Zone 3b Fluvial and Tidal	West London SFRA - Policy map - Metis ¹¹	No
Flood Zone 3a Fluvial and Tidal	West London SFRA - Policy map - Metis	No
Flood Zone 3a Surface Water	West London SFRA - Policy map - Metis	No
Flood Zone 2 Fluvial and Tidal	West London SFRA - Policy map - Metis	No

Quantitative Assessment

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

Qualitative Assessment

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

The results of the Level 2 Strategic Flood Risk Assessment (SFRA) were also integrated where relevant.

¹¹ <https://metis.maps.arcgis.com/apps/webappviewer/index.html?id=80305613f5f14835b7fc8891cfaca17a>

A.1.2 Heritage

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

Data for assessment

Data used for assessment	Data Source	Data update from Reg.18?
Local Heritage Sites	Ealing Council	Yes
Positive Contributors	Ealing Council	Yes
Conservation Areas	Ealing Council	Yes
Conservation Areas in Neighbouring Boroughs	London Datastore	Yes
Statutory Listed Buildings (Grade I, Grade II*, Grade II), including neighbouring boroughs	Historic England	Yes
Registered Parks and Gardens	Historic England	Yes
Scheduled Ancient Monuments	Historic England	Yes
World Heritage Site	Historic England	Yes

This assessment was undertaken by Ealing Council's Heritage Officer.

Quantitative Assessment

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

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

- 100 m of Local Heritage Assets

- 500 m of Conservation Areas
- 500m of Grade II listed buildings
- 500m of Grade II* listed buildings
- 1 km of Grade I listed buildings
- 500 m of Registered Parks and Gardens
- 1 km of Scheduled Ancient Monuments
- 1km of a World Heritage Site

Qualitative Assessment

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

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

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

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

The assessment undertaken was entirely desk-based and based on the professional judgement of the council's Heritage Officer.

A.1.3 Air quality

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

Data for assessment

Data used for assessment	Data Source	Data update from Reg.18?
NO2 Concentration	London Atmospheric Emissions Inventory ¹² (LAEI) – London Data Store	No
PM10 Concentration	London Atmospheric Emissions Inventory (LAEI) – London Data Store	No

Quantitative Assessment

The quantitative assessment was to identify the air quality for each site and a buffer of 50m was applied to each site to represent a site's surrounding area. Sites and their surrounds which were not located in an area exceeding the identified limits scored a (+). Sites wholly / majority located in affected areas scored a (-), and parts of sites/ surrounds located within affected areas were scored a (0), suggesting mitigation would be required as part of future developments.

¹² Available at: <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory--laei--2019>

A.1.4 Health and safety

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

Data for assessment

Data used for assessment	Data Source	Data update from Reg.18?
Electricity Cable	Ealing Council	No
Substations	Ealing Council	Yes
Gas Pipe	Ealing Council	No
Gas Pipe Inner Zone	Ealing Council	No
Gas Pipe Outer Zone	Ealing Council	No
Northolt Air Safety Area	Ealing Council	Yes
Sites with potential for Tall Building	Tall Buildings Strategy, February 2024	Yes

Quantitative Assessment

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

- Electricity cables
- Substations
- Gas pipes (Inner and Outer Consultation Zones)
- Northolt Air Safety Area
- Potential for Tall Building¹³

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

¹³ Depending on proposed height, consultation may be required with relevant consultees with regards to air safety.

A.1.5 Biodiversity

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

Data for assessment

Data used for assessment	Data Source	Data update from Reg.18?
SMINCs / SBINCs / SLINCs	GiGL	No
Acton Green Corridor	Ealing Council	Yes
Green Corridor	Ealing Council	No
Ancient Woodland	Natural England	No
Priority Habitat	Natural England	Yes

Quantitative Assessment

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

- Sites of Importance for Nature Conservation (SINCs). Three categories of SINC were assessed – those of metropolitan importance (SMINC), borough importance (SBINC) and local importance (SLINC).
- Acton Green Corridor;
- Green corridors;
- Priority habitats;
- Ancient woodland;
- Priority habitats.

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

Qualitative Assessment

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

- Whether the site included designations within its boundary;
- Whether there was any connectivity between the site and nearby designations.
- Where the location and surrounding uses or environment of a site may lead to potential impacts on biodiversity, the assessment states that mitigation will be required.

Positive scores were given to sites where there was sufficient distance from designated sites to ensure that there would likely be no negative impact.

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

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

In the cases of negative scoring, a 'worst case' scenario was assumed due to biodiversity designations falling within the site boundary. These assessments were undertaken with the assumption that future development on the site may loss in the result of features, with limited opportunities for mitigation, particularly given the requirements for sites to provide Biodiversity Net Gain¹⁴.

¹⁴ BNG makes sure development has a measurably positive impact ('net gain') on biodiversity, compared to what was there before development. In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

A.1.6 Geodiversity

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

Data for assessment

Data used for assessment	Data Source	Data update from Reg.18?
Regionally Important Geological Site	Ealing Council	Yes

Quantitative Assessment

The quantitative assessment used GIS data to identify sites which were located within a 1km buffer of the Regionally Important Geological Site designation¹⁵. Any sites which were not located within the identified buffer were scored (+), and any sites which fell within the buffer were flagged for qualitative assessment.

Qualitative Assessment

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

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

¹⁵ As defined in Policy G9 of the London Plan (2021)

A.1.7 Tree Preservation Order

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

Data for assessment

Data used for assessment	Data Source	Data update from Reg.18?
Register of Protected Trees in Ealing	Ealing Council	Yes

Quantitative Assessment

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

Qualitative Assessment

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

A.1.8 Brownfield vs Greenfield Land

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

Data for assessment

Data used for assessment	Data Source	Data update from Reg.18?
Aerial Imagery	Google Maps	No

Qualitative Assessment

This assessment identified whether a site is majority greenfield or brownfield land based on a qualitative, desk-based assessment of land-use coverage using aerial imagery. Land uses were judged as brownfield based on the definition of 'Previously Developed Land' as set out in Annex 2 (Glossary) of the NPPF (2023).

A.1.9 Contamination

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

Data for assessment

Data used for assessment	Data Source	Data update from Reg.18?
Ealing Contaminated Land Register	Ealing Council	Yes

Quantitative Assessment

The sites were assessed wholly by Ealing Council's Contaminated Land Officer using council's contaminated land records.

Qualitative Assessment

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

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

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

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

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

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

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

Data for assessment

Data used for assessment	Data Source	Data update from Reg.18?
Strategic Industrial Location (SIL)	Ealing Council	No
Locally Significant Industrial Site (LSIS) (existing and proposed additions in the Regulation 19 Local Plan)	Ealing Council	Yes
Aerial Imagery	Google Maps	No

Quantitative Assessment

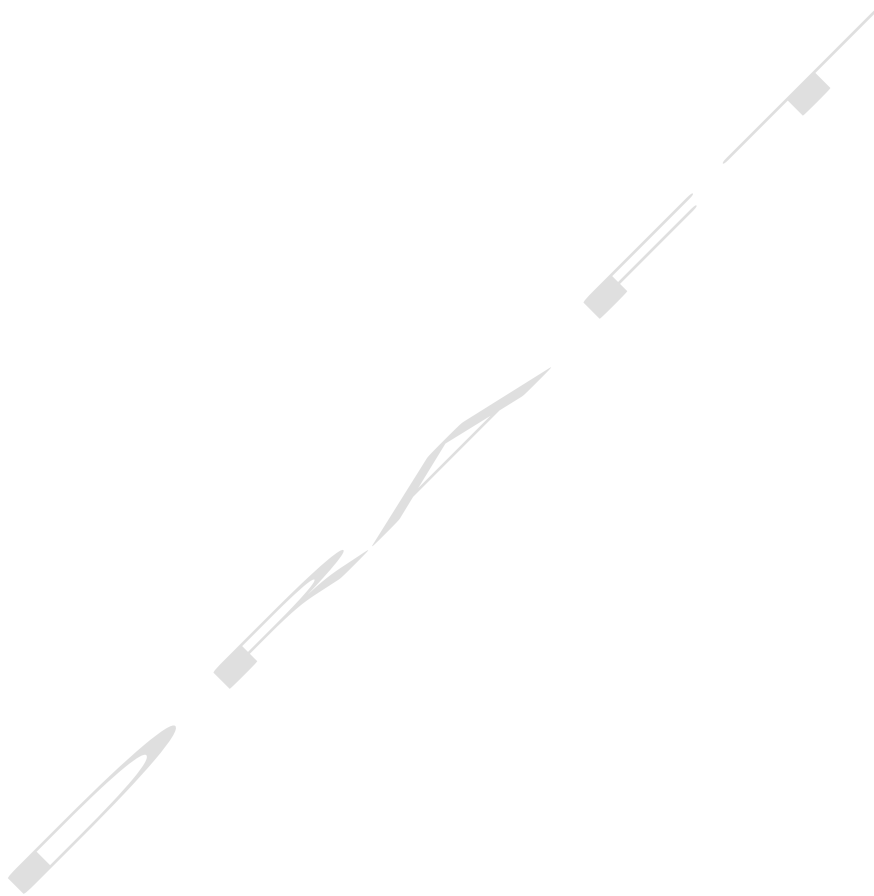
Through GIS, designated industrial sites including Strategic Industrial Locations (SIL) and existing and proposed Locally Significant Industrial Sites (LSIS) were identified. Sites not located within SILs and LSISs were also checked for the presence of industrial uses using aerial imagery, as non-designated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

Qualitative Assessment

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

Sites located adjacent to designated industrial sites were considered in relation to the agent of change principle. The agent of change principle places the burden of mitigation upon the development which changes current circumstances. In the case of designated industrial sites, current circumstances include not only current industrial occupiers and their operations but the future capacity of the site to accommodate any conforming industrial use. This

means that development of sensitive uses such as housing in proximity to designated sites must be future proofed against potential future industrial uses on the designated site. Sites located adjacent to designated industrial sites were scored (0) as mitigation may be required.



A.1.11 Spatial Characteristics

(+)	0	(-)
Site's spatial characteristics have potential to significantly align with the Plan's 'good growth' principles	Site's spatial characteristics have potential to align with the Plan's 'good growth' principles	Site's spatial characteristics have limited alignment with the Plan's 'good growth' principles

Data for assessment

Data used for assessment	Data Source	Data update from Reg.18?
Town Centre boundaries – Metropolitan, Major, District, Town and Neighbourhood Centres	Ealing Council	Yes
Proposed Neighbourhood Centres in the Regulation 19 Local Plan	Ealing Council	Yes
Housing Estates	Ealing Council	No
Opportunity Areas ¹⁶	London Datastore	No
Strategic Areas for Regeneration ¹⁷	London Datastore	No
Public Transport Accessibility Levels (PTAL) ¹⁸	London Datastore	No
Aerial Imagery (for presence of industrial uses)	Google Maps	No

Quantitative Assessment

Using GIS each site was reviewed in relation to focus areas, within which new development was considered to have most potential to accord with the concept of 'good growth'¹⁹:

- Town centres (from neighbourhood centre to metropolitan centre)²⁰. Emerging neighbourhood centres within the Regulation 19 Local Plan (including draft Policy P4: Perivale Station and environs and draft Policy N3: White Hart Neighbourhood Centre) were also considered;

¹⁶ Source: GLA London Datastore (2022): https://data.london.gov.uk/dataset/opportunity_areas

¹⁷ Source: GLA London Datastore (2019): <https://data.london.gov.uk/dataset/indices-of-deprivation>. Refer to footnote 24.

¹⁸ Source: GLA London Datastore (2015): <https://data.london.gov.uk/dataset/public-transport-accessibility-levels>

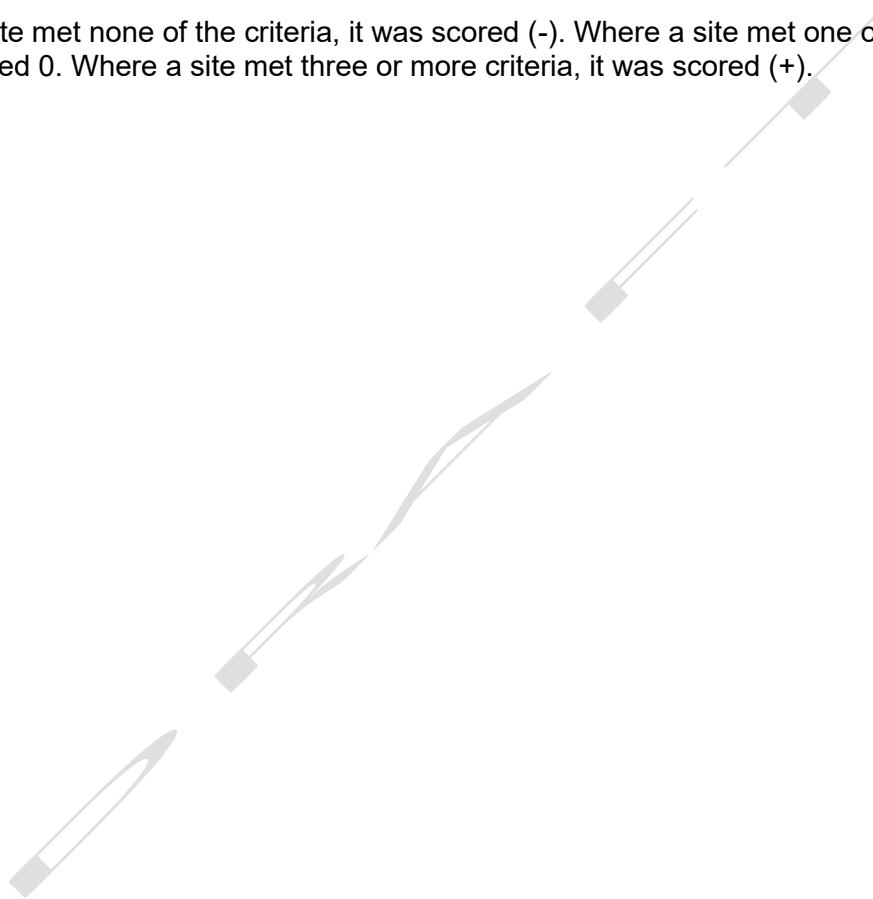
¹⁹ The Local Plan incorporates from the London Plan the concept of good growth, which is growth that is socially and economically inclusive and environmentally sustainable.

²⁰ As per Ealing Local Plan and the London Plan (2021) town centre classification (Annex 1).

- Around places of existing high Public Transport Accessibility Levels (PTAL);
- Municipal housing estates (regeneration-focussed)²¹;
- As part of mixed-use intensification of industrial sites²²;
- Within opportunity areas²³;
- Within strategic areas for regeneration²⁴.

Qualitative Assessment

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



²¹ Where sites include existing housing estates, it was assumed that their development could contribute to local regeneration.

²² Where sites include existing industrial land (either designated or non-designated) and have potential for mixed-use intensification. It was assumed that their development could contribute to local regeneration.

²³ As per the London Plan (2021) Policy SD1 Opportunity Areas

²⁴ As per the London Plan (2021) definition, strategic areas for regeneration are those LSOAs that fall within the top two most deprived deciles of the English Indices of Deprivation (2019).

A.1.12 Accessibility – PTAL

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

Data for assessment

Data used for assessment	Data Source	Data update from Reg.18?
Public Transport Accessibility Levels (PTAL) ²⁵	London Datastore	No

Quantitative Assessment

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

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

²⁵ Sites boundaries have been assessed in GIS using PTAL contour files (Base Year, 2015). The PTAL values have therefore not been taken from TfL's WebCAT tool which is in a tile format and would require manual assessment of sites.

A.1.13 Vehicular access to the site

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

Data for assessment

Data used for assessment	Data Source	Data update from Reg.18?
Aerial Imagery	Google Maps	No
Highways Network GIS data	Ealing Council	No

Qualitative Assessment

Professional judgement was used to determine whether there was suitable access to the site, and whether there was potential to improve connectivity into the site. The assessments were undertaken by Arup and reviewed by Ealing Council's Transport Officer.

A.1.14 Impact on Green Belt or MOL

(+)	0	(-)
<p>Site (or majority of the site) is not located within the Green Belt/ MOL; or</p> <p>Site is currently located within the Green Belt/ MOL but the Green Belt and MOL Review recommended de-designation through boundary changes.</p>	<p>Site is within Green Belt/MOL and the proposed use is considered an appropriate use.</p>	<p>Site is located within Green Belt/MOL and the proposed use is considered an inappropriate use.</p>

Data for assessment

Data used for assessment	Data Source	Data update from Reg.18?
<p>GB/MOL parcel recommendations and proposed Regulation 19 Local Plan boundary amendments</p>	<p>LBE (Green Belt and MOL Review Stage 2, February 2024)</p>	<p>N/A - This assessment was not undertaken at Reg.18 stage, but a full assessment was undertaken for all sites being assessed to support the Reg.19 Local Plan</p>

Quantitative Assessment

The Green Belt and MOL Review identified that a small number of sites (or parts of sites) do not contribute towards Green Belt/MOL objectives. These sites have potential to meet identified development needs and thus are identified for change in designation, demonstrating the corresponding exceptional circumstances. Green Belt and MOL boundary changes are proposed within the Regulation 19 Local Plan only where a site has been identified for development and will be allocated.

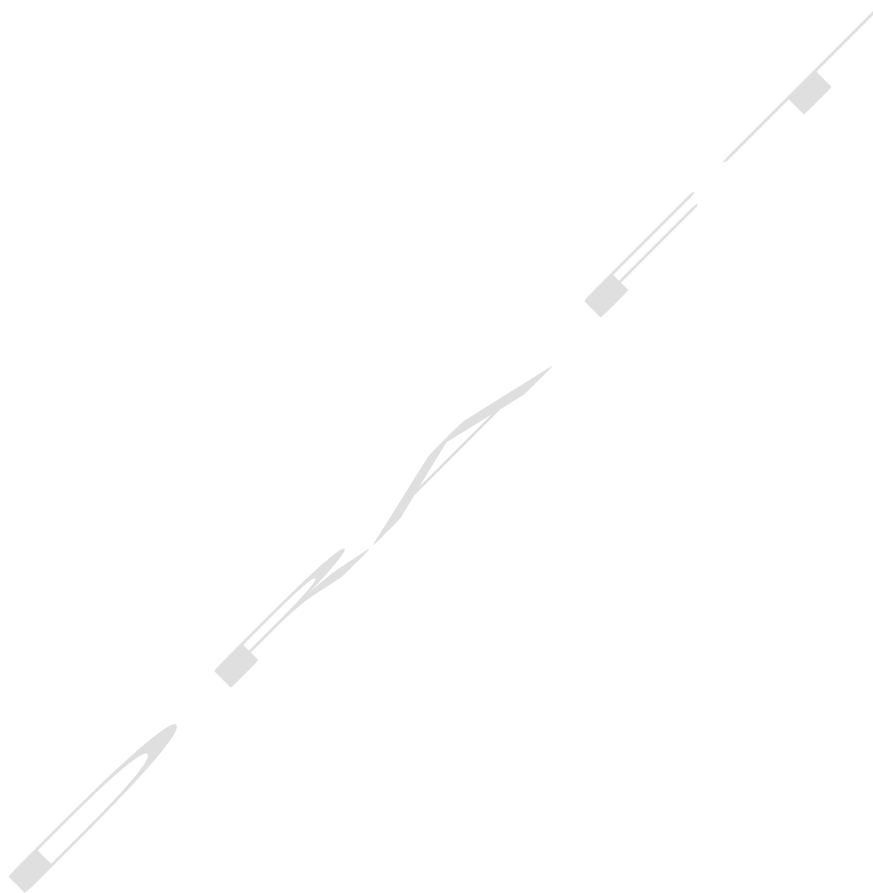
This assessment will identify whether sites fall within either the Green Belt or MOL network, using GIS data.

Using the findings from the Green Belt and MOL Review (the evidence supporting the proposed Regulation 19 Local Plan boundary changes), assessments will consider whether sites are included within parcels recommended for de-designation from Green Belt/ MOL.

Sites not located within the Green Belt or MOL were scored (+).

Sites located within the Green Belt or MOL were scored (+) where only a small part of the site is designated and its loss could be avoided in future development. Sites were also scored (+) where the Local Plan is proposing de-designation to the whole site. Furthermore, sites were scored (+) where the Local Plan is proposing de-designation to only part of the site; where future development would need to be principally focussed on the previously developed land.

Sites located within the Green Belt or MOL (where there is no recommendation to de-designate) were considered in line with their proposed uses. Sites scored a (0) where the proposed uses were considered to be appropriate in line with Paragraph 154 of the NPPF²⁶. Sites scored a (-) where the proposed uses were considered to be inappropriate in line with Paragraph 154 of the NPPF.



²⁶ https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf

A.1.15 Impact on provision of open space

(+)	0	(-)
The development is unlikely to involve the loss of any open space.	The development may involve the loss of open space but there are opportunities for on-site offsetting or mitigation.	The development may involve the loss of open space with limited opportunities for on-site or off-setting or mitigation.

Data for assessment

Data used for assessment	Data Source	Data update from Reg.18?
Green Corridor	Ealing Council	No
Acton Green Corridor	Ealing Council	Yes
Blue Ribbon	Ealing Council	Yes
Community Open pace	Ealing Council	Yes
Heritage Land (aka. Parks)	Ealing Council	Yes
Public Open Space	Ealing Council	Yes
CENP Local Green Space	Ealing Council	Yes

Quantitative Assessment

This assessment used GIS data to identify the presence of existing open spaces within the site:

- Green Corridor
- Acton Green Corridor
- Blue Ribbon
- Community Open pace
- Heritage Land (aka. Parks)
- Public Open Space
- CENP Local Green Space

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

A.1.16 Access to open space

(+)	0	(-)
Site is not located within an area of deficiency in access to small / local / pocket or district or metropolitan or regional parks.	N/A	Site is located within an area of deficiency in access to small / local / pocket or district or metropolitan or regional parks.

Data for assessment

Data used for assessment	Data Source	Data update from Reg.18?
Area of Small / Local / Pocket Park Deficiency	GiGL ²⁷	No
Area of District Park Deficiency	GiGL	No
Area of Metropolitan Park Deficiency	GiGL	No
Area of Regional Park Deficiency	GiGL	No

Quantitative Assessment

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

²⁷ Available at: the GLA London Datastore (2022) <https://data.london.gov.uk/publisher/gigl>

A.1.17 Distance to Nearest Primary School

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

Data for assessment

Data used for assessment	Data Source	Data update from Reg.18?
Primary Schools within Ealing	Ealing Council	Yes
Primary Schools in neighbouring boroughs within proximity to Ealing	Ealing Council	No

Quantitative Assessment

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

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

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

Due to insufficient data, this assessment was limited to consideration of distances to primary schools and did not consider availability of school places. The assessment did not specifically consider SEN schools due to insufficient being available at the time of the assessment.

A.1.18 Distance to Nearest Secondary School

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

Data for assessment

Data used for assessment	Data Source	Data update from Reg.18?
Secondary Schools within Ealing	Ealing Council	Yes
Secondary Schools in neighbouring boroughs within proximity to Ealing	Ealing Council	No

Quantitative Assessment

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

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

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

Due to insufficient data, this assessment was limited to consideration of distances to secondary schools and did not consider availability of school places. The assessment did not specifically consider SEN schools due to insufficient being available at the time of the assessment.

A.1.19 Distance to Nearest GP Surgery

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

Data for assessment

Data used for assessment	Data Source	Data update from Reg.18?
GP surgeries within Ealing's boundary, and surrounding boroughs, within proximity to Ealing	Ealing Council	No

Quantitative Assessment

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

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

Distances were determined in consultation with Ealing Council officers.

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

Appendix D: Details of Deliverability Criteria

Below are details of the deliverability criteria used for the Regulation 19 site assessment. The first two criteria concerning Availability were used for the Regulation 18 site assessment and were combined with additional Availability and Achievability criteria for Regulation 19 site assessment.

In summary, the deliverability assessment criteria used for the Regulation 18 stage comprised:

Deliverability Criteria
<i>Availability</i>
A1.20 Safeguarded alternative uses
A1.21 On-site restrictions

Additional deliverability assessment criteria were used for Regulation 19 and these included:

Additional Deliverability Criteria
<i>Availability</i>
A1.22 Ownership
A1.23 Existing use(s)
A1.24 Planning status
A1.25 Availability within plan period and readiness of site for development
<i>Achievability</i>
A1.26 Site marketability
A1.27 Viability considerations
A1.28 On-site physical infrastructure constraints

A.1.20 Safeguarded alternative uses

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

Quantitative Assessment

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

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

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

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

A.1.21 On-site restrictions

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

Quantitative Assessment

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

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

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

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

A.1.22 Ownership

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

Qualitative Assessment

Information provided or gathered in the land promoter / developer surveys, Regulation 18 consultation and Call for Sites submissions together with other intelligence was primarily used to inform this assessment.

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

A.1.23 Existing use(s)

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

Quantitative Assessment

Information provided or gathered in the land promoter / developer surveys, Regulation 18 consultation and Call for Sites submissions together with other intelligence was primarily used to inform this assessment.

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

A.1.24 Planning status

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

Quantitative Assessment

GIS analysis was used to flag relevant planning history for the preferred sites, based on the planning history GIS address points overlaid with the preferred site polygons.

Qualitative Assessment

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

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

This was supplemented with additional information provided in the land promoter / developer surveys, Regulation 18 consultation and Call for Sites submissions.

A.1.25 Availability within plan period and readiness of site for development

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

Qualitative Assessment

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

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

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

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

A.1.26 Site marketability

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

Qualitative Assessment

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

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

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

A.1.27 Viability considerations

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

Qualitative Assessment

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

This criterion was assessed using information provided in the land promoter / developer surveys, Regulation 18 consultation and Call for Sites submissions in the first instance. Where relevant site-specific responses were not received, reference was made to viability assumptions made by the council.

A.1.28 On-site physical infrastructure constraints

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

Qualitative Assessment

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

Reference was made to the suitability assessments relating to flood risk, access, and contamination and bolstered using information provided in the land promoter / developer surveys on the following constraints:

- Flood risk / drainage;
- Contamination;
- Topography;
- Mains water supply;
- Mains sewerage;
- Electricity supply;
- Gas supply;
- Highways provision and / or capacity;
- Telecoms; and
- Other.

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

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