



# Planning Inspectorate

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Mr S Barton,  
London Borough of Ealing  
By email

Our Ref:  
Ealing Ref:  
Date:

PINS/ A5270/429/9  
EX2  
20 December 2024

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Dear Mr Barton,

## **Examination of the Ealing Local Plan 2024-2039**

1. Further to the submission of Ealing's Local Plan 2024-2039 (the Plan), we have started our work on the examination with an initial reading of the Plan, the supporting evidence base and representations.
2. Based on what we have read so far, we are writing to set out our understanding of the basis and scope of the plan to be examined and to raise some initial questions [IQs] and requests for further information on specific topic areas.
3. We are raising these matters at this point in the interests of proceeding with the examination efficiently. Please provide brief responses as prompted, with reference to the main relevant evidence and using the referencing system in the examination library. In doing so, it would be helpful if you could consider whether it might be necessary to suggest any potential main modifications to the Plan to make it sound and the reasons for doing so.
4. We are not inviting further comment from any other party at this stage and will set out in due course when representors may make further submissions.

## **The scope of the examination**

5. The plan that we are examining is Ealing's Local Plan (Regulation 19), Consultation version, 28 February 2024 [examination library reference S1]. This is the starting point for the examination.
6. Although revisions to the National Planning Policy Framework (the Framework) were published on 12 December 2024, this examination will be

against the Framework (December 2023), in accordance with the transitional arrangements.

## **Modifications to the Plan**

7. We have noted the Schedule of Suggested Modifications [S24, S24a, S24b]. However, these do not form part of the submission version of the Plan. During the examination we will consider whether any main modifications should be recommended for soundness. All necessary main modifications would then be subject to full public consultation in due course.

## **Topic specific initial questions and requests**

### Examination library/ documents

**IQ1.** Please confirm whether the errata to the Plan [S14] should also form part of the plan to be examined and that the report was subject to consultation at the Regulation 19 stage.

**IQ2.** What is the current status of the draft Ealing LPA Charging Schedule [EB41]?

**IQ3.** For any instances where the evidence base predates the December 2023 Framework, are there any implications for the Plan or the evidence base arising from any relevant updates to national policy and associated Planning Practice Guidance? Please explain the reasons for your response.

**IQ4.** Please can you confirm when the following documents will be added to the examination library:

- 5-year Housing Land Position Statement [EB73]
- Housing trajectory (including affordable housing trajectory)
- Ealing Metropolitan Town Centre Growth Strategy [EB57]
- Updated interactive policies map (November 2024) [S23]

### Duty to co-operate

**IQ5.** Please update/supplement the Duty to Co-operate Statement [S22] to include the following:

- a. A full list of the duty to co-operate bodies that you have engaged with.
- b. What the Council regard to be the strategic cross boundary matters of relevance to the Plan requiring co-operation.
- c. Any evidence to demonstrate that discussions have been undertaken constructively, actively and on an on-going basis in respect to any strategic matters for the Plan and how they have been effective in shaping its content.

**IQ6.** In respect of statements of common ground, we note the Council's production of (or intention to produce) statements with the following:

- The London Borough of Brent [S22a] (unsigned)
- TfL [S22b]
- Sport England [S22c] (unsigned)
- The Greater London Authority /Mayor of London (to follow)
- The London Borough of Hillingdon (to follow)
- Historic England (to follow)
- OPDC (to follow)

Bearing in mind that statements of common ground are the means for demonstrating that a plan is based on effective cooperation and that you have sought to produce a strategy based on agreements with other authorities, please set out the following:

- a. How specific regard has been paid to the Planning Practice Guidance in respect of the scope, preparation, and publication of statements of common ground.
- b. The timescales for bringing forward statements that are currently identified as being 'to follow'.
- c. Whether there are any outstanding matters of disagreement.
- d. The reasons for any evidential deficiencies or omissions in terms of following the guidance and any remedial steps the Council proposes to take.

#### General conformity with the London Plan

**IQ7.** Considering the requirements of section 24(1)(b) of the Planning and Compulsory Purchase Act 2004, please provide a table setting out the Council's position on general conformity with the London Plan for each policy in your plan. This should include any reasons for variance and the Council's understanding of the GLAs position on conformity for each.

#### Planned Growth

**IQ8.** Is the Plan sound in the absence of any anticipated yields for housing units and/ or commercial floorspace for each of the proposed site allocations?

**IQ9.** Please provide a summary table which sets out the identified planned growth through the proposed site allocations against the identified development requirements in the context of both the boroughwide and individual 7 town spatial strategies.

#### Housing

**IQ10.** Is the Council seeking to have a 5-year housing land supply confirmed through this examination? If so, was the Plan consulted upon at the regulation 19 stage on that basis?

**IQ11.** Please complete the following summary forms at:

- a. Annex 1 – for each site that the Council assumes will contribute to the claimed 5-year housing land supply upon adoption.
- b. Annex 2 – to summarise the overall housing land supply position over the plan period.

**IQ12.** In terms of Gypsy and Traveller accommodation, a joint needs assessment was undertaken in 2018 [EB80] and a borough-wide pitch assessment prepared in 2023 [EB74].

- a. Is the evidence base in terms of Gypsies and Travellers sufficiently up to date and robust? Did [EB74] include resurveying the Gypsy and Traveller community, and if not, why was this?
- b. How does the Plan ensure that the needs for Gypsy and Traveller accommodation will be met? Is the Plan justified and effective in this regard?

#### Employment and economy

**IQ13.** Please provide a topic paper setting out clearly:

- a. A summary of how each piece of the evidence in the 'employment and economy' section of the evidence base [E49 to E65] fits together to justify the spatial strategy and specific policies in the Plan.
- b. The baseline position on existing industrial capacity in the Borough by location/designation and how the Council anticipates that will change over the plan period (including as a result of the growth proposed by the Plan) by reference to the evidence base.
- c. Any changes to existing industrial land designations resulting from the Plan (including boundary changes).

#### Infrastructure

**IQ14.** Section 4.3 of the Ealing Infrastructure Delivery Schedule Report [EB84] identifies flood management projects as being amongst the costed projects (see table 13). It then goes on to say that the costs do not include flood protection and mitigation measures. Please clarify how flood management is treated for the purposes of the Infrastructure Delivery Schedule.

**IQ15.** Please provide a supplementary table to the Infrastructure Delivery Schedule at Section 5 of [EB84] setting out the specific allocations in the plan alongside the development classified as 'Critical-Delivery' that must be delivered for that allocation to be unlocked.

**IQ16.** Please consider whether any other updates can be made to the Infrastructure Delivery Schedule, particularly for columns that are currently identified as 'TBC'.

#### Transport

**IQ17.** The representations from National Highways and the Ealing Council Transport Strategy [EB87] acknowledge that traffic congestion on highways is a significant problem and that key highway corridors in the Borough are at capacity. What evidence is available to demonstrate what the effects of individual allocations and the cumulative growth in the Plan would be on existing highway capacity, both within the Borough and beyond its boundaries (including the strategic road network).

#### Local energy efficiency standards

**IQ18.** Please provide a note setting out how any policies in the Plan that propose to set local energy efficiency standards are justified and evidenced in light of the [Written Ministerial Statement dated 13 December 2023](#).

#### **Next steps**

8. We would appreciate an initial acknowledgement/response to this letter by Friday 10 January 2025 with a suggested timetable for responding on the more detailed matters raised, which we will agree with you via the Programme Officer.
9. Your responses will inform our decision about whether the examination is able to move forward to the publication of our Matters Issues and Questions (MIQs), guidance notes, and hearing programme. We may also have further requests for information/ clarification, which may include the preparation of focused topic papers.

*Darren McCreery and Carole Dillon*

INSPECTORS

Enclosures: Annex 1 and 2

## Annex 1

### Local Plans: 5-year housing land supply

The following information should be provided for every site that the Council assumes will contribute to the claimed 5-year supply.

#### A. All sites with detailed planning permission, and sites of <10 homes and <0.5ha that have outline planning permission

Site name					
Local plan ref					
Total capacity					
Plan period completions					
5-year completions					
<i>(Please specify years)</i>	YR 1	YR 2	YR 3	YR 4	YR 5
Completions					

These sites can be considered deliverable unless there is clear evidence that homes will not be delivered within 5 years.

#### B. Other sites (including those of at least 10 homes or at least 0.5ha with outline permission, with a grant or permission in principle, allocations, or identified on brownfield register)

Site name					
Local plan ref					
Total capacity					
Plan period completions					
5-year completions					
<i>(Please specify years)</i>	YR 1	YR 2	YR 3	YR 4	YR 5
Completions					

Clear evidence relating to:

Developer's delivery intentions including anticipated start and build out rates
Current planning status and progress towards the submission of an application
Progress with site assessment work
Site viability

<b>Availability: ownership, any existing uses, etc</b>
<b>Infrastructure provision</b>

Annex 2

Local plans: summary of overall housing land supply

Use the table below (extended to cover the whole plan period) to summarise the overall housing land supply identified in the Plan.

							Annual completions (by year)																	
							(Please specify years)																	
Ref	Name	Size Ha	Total capacity	Planning status*																				Total
Windfalls (if applicable)																								
Total																								

\* Planning status: completed, under development, detailed planning permission, outline planning permission, allocation without planning permission, etc.