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Mr D. McCreery and Ms C Dillon,  
The Planning Inspectorate  
c/o Paige Gaughan,  
Local Plan Programme Officer,  
Ealing LPA

Your ref  
EX5

My ref  
**CR/004**

Extension  
**8056**

Date  
**17 January 2025**

Dear Sir/Madam,

**Examination of the Ealing Local Plan 2024-2039:  
Ealing LPA's Response to Initial Questions, Part 2, re. IQ17**

Further to my note, dated Friday 10<sup>th</sup> January 2025, please find response below in relation to IQ17 regarding the initial question on 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).*

**LPA Response:** Traffic congestion is high on many of the key corridors in the Borough. However, the established view of how to address congestion has changed significantly in recent years. The previous method for determining highway capacity and requirement was known as 'predict and provide' (P&P), which involved predicting the impacts of development and growth on the highway network and using this to plan additional capacity to address any predicted congestion effects.

The more recently established method, now considered good practice, is known as 'decide and provide' (D&P). This involves deciding on the overall composition of the transport network, which is needed in order to meet strategic objectives, e.g. lower transport emissions. Infrastructure is then provided with the aim of achieving those

outcomes. This approach follows the shift in public policy towards a transport network which prioritises walking, cycling and public transport.

It is now well-established that economic growth and development is achievable *without* providing additional capacity on the highway network, and *with* prioritising active and sustainable modes. Ealing's approach is to prioritise walking, wheeling, cycling, public transport and low-emission freight, in line with our statutory Local Implementation Plan (LIP) for delivering the Mayor's Transport Strategy. It is Ealing's view that the Local Plan is deliverable without recourse to provision of additional road capacity. The forthcoming LIP programme for 2025-28, which will be taken to Cabinet in April 2025, will continue to focus on delivering cycling infrastructure, bus priority schemes, public realm improvements and road safety schemes.

The evidence referred to in the representation from National Highways would traditionally be in the form of a strategic transport modelling exercise for the whole Borough. Such an exercise would incur a very significant cost, which has not been available since the large decrease in transport funding following the Covid-19 pandemic. Furthermore, this exercise would not provide useful ongoing evidence; even had the modelling indicated an increase in congestion as a result of the Local Plan, the policies to mitigate it would still follow the D&P approach, focusing on active and sustainable modes, and would not involve provision of additional highways capacity. As a result, it was considered that this evidence-base exercise was not good value for money.

However, at a local level and in terms of site allocations, there is evidence to support our approach in terms of alignment with existing policy, as well as existing transport modelling which has been conducted to support specific projects.

The Local Plan is aligned with the London Plan, including the London Plan policies on car parking provision. All sites will be car-free or will provide car parking strictly according to their Public Transport Accessibility Level (PTAL). Ealing will expect sites to align with the Mayor's Transport Strategy's target for 76% of trips to be made by walking, cycling and public transport in Ealing by 2041, and to ensure a minimum of vehicle trips are generated. Construction Logistics Plans, Parking Management Plans and Travel Plans will be employed to ensure as few trips as possible are made by motor vehicles. Altogether, this approach will ensure minimal impacts on the highway network and support the longer-term shift to alternative modes.

At the local level, we are conducting transport modelling exercises where deemed appropriate for longer-term planning. This was completed in 2024 for Northolt, and we are planning to conduct a similar exercise for Southall in 2025/26.

If any further clarification or information is required, please don't hesitate to get in touch.

Yours sincerely

*Steve Barton*

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