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Ms Louie Summers  
The Planning Inspectorate  
Temple Quay House  
2 The Square  
Bristol, BS1

Your ref  
EX1

My ref  
**CR/001**

Extension  
**8056**

Date  
**16 December 2024**

Dear Louie,

### **A. Background**

Following submission by Ealing LPA of its Local Plan on 18 November 2024 I acknowledge the recent appointment of Mr D McCreery and Ms C Dillion as the appointed planning inspectors who will conduct the independent examination of our plan.

I look forward to working with them and the Inspectorate over the course of the examination and will be pleased to help and assist the Inspectorate in any way that I can.

### **B. Submission**

All relevant documents have already been submitted and please do let me know if there are any problems with accessing them or if any clarity, help or assistance is required. They have also been published on a dedicated part of the council's web pages and can be found from this landing page:

[New Local Plan \(Regulation 22\) – submission and examination | New Local Plan | Ealing Council](#)

### **C. Ealing's Local Plans Team**

I am the Strategic Planning Manager for Ealing Council, and my team has responsibility for the preparation of the Local Plan and for planning policy matters, amongst other things. I have over 40 years' experience working in this sector. In addition to my role and responsibilities at Ealing, I also Chair the Planning Officers Society Spatial Planning

Network and serve as a member of the POS Board and their Lead Subject Specialist on Local Plans. I also Chair the West London Policy Officers Group (under the auspices of the West London Alliance) and I am Vice Chair of the Spatial Planning Group for the Heathrow Strategic Planning Group.

Throughout the examination process I will be ably assisted by my small team which includes four Principal Officers – Samuel Cuthbert, Ilias Drivylas, Brianne Stolper and Ian Weake. We shall also call on colleagues from across the organisation to help and assist on specific issues and matters including Emily Shovlar in Transport Planning, amongst others. Once the scope and list of issues and matters to be discussed is known, I will provide a further update on personnel to be involved.

#### **D. Administrative Arrangements for the Examination**

Ealing Council has appointed Paige Gaughan as the Programme Officer to manage the procedural and administrative aspects of the examination. She will act as the main channel of communication between the Inspectorate and all parties participating in the examination, including council officers and representors.

Her contact details are as follows:

- email: [GaughanP@ealing.gov.uk](mailto:GaughanP@ealing.gov.uk)
- address - Perceval House, 14-16 Uxbridge Road, London W5 2HL
- telephone - 020 8825 9562

A Service Level Agreement between The Planning Inspectorate and the Council has already been signed, approved and exchanged between the parties. In addition, a Purchase Order number has already been set up for The Planning Inspectorate, and details have been sent separately to you.

#### **E. Examination Timetable**

The Council's preferred dates for the examination hearings is to avoid any holiday periods such as Easter and will otherwise depend of course on the Inspector's work pattern and what is considered relevant and necessary.

The Council would estimate in the region of 5 sitting days for the public hearings, with the exception of any procedural issues, but this is only an approximate estimate at this stage and will depend on the range and complexity of the matters, issues and queries to be identified by the appointed Inspectors.

The Council is willing and able to host both in person and/or virtual hearings as the Inspector considers necessary and appropriate.

## **F. Brief Summary of Main Issues for Examination**

Given the national and regional planning policy framework, the strategic aims and objectives outlined in the Council Plan 2022–26, and the need to respond to a series of urgent policy matters, developing a Local Plan will always involve a balancing of different priorities. This is reflected in the wide ranging and sometimes conflicting feedback we received.

Nonetheless, the council is grateful to all those organisations, bodies, community interest groups, developers and individuals who have responded and taken the time and interest in planning for the future of Ealing.

Some of the most noteworthy issues that have been raised include:

**(i) Scope of the Local Plan:** whether the policy coverage in the Local Plan is too detailed or should be more comprehensive in coverage.

The Local Plan is a technical and highly specific document and is also based on an extensive technical evidence base. It must comply with the relevant statutory guidance and be in general conformity with the London Plan. The London Plan, published in 2021, is an integral part of Ealing's local development plan and there is no need to duplicate or replicate its policies.

**(ii) Housing supply:** whether too much or too little can be practically delivered over the plan period and what proportion is genuinely affordable and meets specific needs.

It is important to remember that housing delivery targets are set by the London Plan and that government intends to move to a new standard method that will set even more ambitious and challenging targets for the capital.

A revised Housing Five-Year Land Supply and Housing Trajectory will be published shortly and will address concerns raised about a lack of specificity regarding housing quantum for individual Development Sites (or site allocations). It will provide information for each individual site over the whole plan period (not just the first five years) which have previously been aggregated in a total net figure.

**(iii) Infrastructure:** whether the necessary investment is being made in supporting infrastructure.

Supporting infrastructure plans are set out in the Infrastructure Delivery Plan and their viability is assessed in the Local Plan viability assessment. Borough wide infrastructure schemes are summarised in Table SS1 in Chapter 3 and key infrastructure is also summarised in each of the Town Plans in Chapter 4.

The capacity of planning and development to fund infrastructure is finite and plans depend on further public and private investment to meet infrastructure needs. The council will continue to work closely with partners and key stakeholders to positively plan for the borough's infrastructure needs.

**(iv) Climate Action:** whether the Local Plan goes too far or not far enough in addressing the impacts of climate change.

Addressing climate action is one of the three main pillars of the Local Plan and the planning system is uniquely well placed to secure a low carbon approach to the design of buildings. The Local Plan includes strategic objectives to optimise the use of land, invest in sustainable connectivity, manage waste and promoting self-sufficiency, support the delivery of net carbon buildings and build resilience and adaption to a changing environment. A suite of development management policies includes operational energy, embodied carbon, whole life carbon cycles, and reducing waste and supporting the circular economy.

Although some concerns were raised about the effectiveness of the approach to be taken, it is important to recognise that the influence of the Local Plan is largely limited to shaping those developments which require planning permission and trigger certain policies.

The plan also follows current best practice in energy and carbon emission, and major development is required to undertake carbon optioneering to determine lifetime impacts including where reuse may be more efficient.

**(v) Density and Tall Buildings:** whether the Local Plan is too flexible or inflexible in controlling tall buildings.

The London Plan requires (Policy D3) site capacity to be optimised using a design led approach so that all development makes the best use of land. Whilst high density does not need to imply high rise, tall buildings can form part of a plan led approach to facilitating regeneration opportunities and managing future growth.

The definition of Tall Buildings is derived from London Plan Policy D9 which requires suitable locations and appropriate building heights to be set in the Local Plan. This does not mean that all buildings up to this height are automatically acceptable; such proposals will still need to be assessed in the context of other planning policies to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area.

The plan is also informed by a best practice Character Study and this guides proposed site allocations and detailed policies on height. It should be noted that the consultation version of Tall Buildings Study

was subject to some transcription errors which have now been corrected in the submission version.

**(vi) Green Belt/Metropolitan Open Land** - whether the Local Plan should release Green Belt/MOL or not.

The Local Plan establishes a framework for maintaining, enhancing and expanding the network of green infrastructure in the borough. Ensuring Green Belt and MOL sites have correct, up-to-date, and defensible boundaries is important as incorrect boundaries can undermine the integrity of the wider Green Belt or MOL parcel and the council's ability to protect it from inappropriate development. The council has, therefore, reviewed all Green Belt and MOL sites and has identified appropriate boundary corrections which reflect the current reality and use of sites.

Green Belt and MOL boundary changes are also proposed only where a site has been identified for development and allocated in this Local Plan. These are a small number of sites (or parts of sites) that do not contribute towards Green Belt/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.

A number of the recommended changes proposed at Regulation 18 are now not being pursued, as detailed in the Green Belt/MOL - Stage 2 report.

**(vii) Viability** - whether policies and proposals in the Local Plan may adversely impact the viability of the future development proposals.

A full Local Plan viability assessment has been undertaken which tested the impact of emerging plan policies.

**(viii) Consultation and engagement** - whether consultation and engagement were adequate and the degree to which the council listened to feedback given.

The Consultation Statement (see S20-21 in the Examination Library) is testament to the amount of effort and resource that the council devoted to the production of the Local Plan. An initial round of consultation (Shaping Ealing) sought to help identify the key issues that local residents and businesses are dealing with, and it helped to shape initial Local Plan proposals. This was followed by three formal rounds of public and stakeholder consultation.

Consultation feedback is an important part of the evidence base for the Local Plan and the council have actively listened to the feedback it has received. A summary of the key changes made after publishing its

Initial Proposals (Regulation 18) is provided at Paragraphs 0.20 to 0.25 and Table 1 of the council's Final Proposals (Regulation 19).

### **G. Modifications**

The council has also taken the representations made at Regulation 19 into account and, where it considers it to be appropriate, has suggested a minor or technical modification. These are contained in a detailed schedule (see S24 in the Examination Library) and in a summary of the most noteworthy suggestions (see S20 in the Examination Library). These primarily serve to provide better clarity, correct any matters of fact, or address any typographical or transcription errors in preparing the draft Local Plan.

In accordance with section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended), the Council requests that the Inspector recommends main modifications as necessary to make the plan sound and legally compliant and acknowledges any such recommendations are not limited in scope or purpose to the suggested modifications already made.

Finally, I and my team look forward to working with you over the coming months and please do not hesitate to contact me if you require any further information or assistance.

Yours sincerely

*Steve Barton*

**Steve Barton,**  
Strategic Planning Manager

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