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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  
EX3

My ref  
**CR/002**

Extension  
**8056**

Date  
**10 January 2025**

Dear Sir/Madam,

**Examination of the Ealing Local Plan 2024-2039:  
Ealing LPA's Response to Initial Questions, Part 1**

Thank you for your letter, dated Friday 20<sup>th</sup> December 2024 (received by me on Tuesday 24<sup>th</sup> December 2024) setting out initial observations and questions on Ealing's Local Plan.

You asked for an initial acknowledgement/response by Friday 10 January 2025 with a suggested timetable for responding on the more detailed matters raised which are set out below. Comments on the context and scope of the examination, the treatment of any potential modifications and next steps are duly noted and understood.

Please let me know if you require further help or clarification to our responses and/or are content with my proposals/timetable regarding any detailed responses that will follow.

**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.

**LPA Response:** Yes.

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

**LPA Response:** The charging schedule is currently undergoing examination subsequent to a Modifications Consultation from 15 October to 12 November 2024. The Council will provide a projected date for the inspector's report as soon as that is available.

**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.*

**LPA Response:** This note will be provided before the end of January 2025.

**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)*

**LPA Response:** The Council last published a Five-Year Housing Land Supply (5-YHLS) position statement and housing trajectory in November 2023 {EB72} to support the preparation of the emerging Local Plan. It was intended that a further revised paper would be published in November 2024 at submission but unfortunately a key member of the Council's Strategic Planning Team has been on jury service at the Old Bailey since the end of September 2024. It is currently anticipated that this will end in the week commencing 20<sup>th</sup> January 2025. On that basis, this paper should be completed before the end of February 2025.

- *Ealing Metropolitan Town Centre Growth Strategy [EB57]*

**LPA Response:** Work on Ealing Metropolitan Town Centre Growth Strategy [EB57] has been delayed and the study may not be available before the end of April 2025. This is a supplementary piece of evidence that will set out more detail on Council plans for the Ealing Metropolitan Town Centre but is not essential to support the strategic policies in the submission plan. Its role and context in relation to other employment evidence will be set out more fully in the response to IQ13.

- *Updated interactive policies map (November 2024) [S23]*

**LPA Response:** The Interactive Policies Map {S17} has already been updated. To ensure easier accessibility the suggested changes proposed by the Council have been added as separate layers to distinguish them from those consulted upon at Regulation 19. They are referenced in the index on the left bar as "Suggested modifications post Reg 19." For the avoidance of doubt, the suggested changes include mostly minor amendments to the following site allocation boundaries:

- 02AC Acton Gardens
- 20EA Downhurst Residential Care Home
- 06GR Smiths Farm
- 04NO Northolt Driving Range
- 07NO Yeading Lane II
- 10NO Airways Estate

It also illustrates a separate suggestion to:

- Remove a SIL designation from part of the existing Greenford Quay development in North Greenford that extends south of the Grand Union Canal which has already been developed by a residential led scheme.

It is suggested that in the examination library {S23} a reference is made to the existing Interactive Policies Map {S17} and a note provided that this includes new separate layers illustrating suggested modifications post Regulation 19 and your guidance would be appreciated.

Be aware that the Interactive Policies Map does not yet illustrate a further suggested amendment to an existing site allocation boundary for 02GR (Greenford Broadway Car Park) which was highlighted in the Schedule of Suggested Modification {S24} at SMM84. This says: "Amend the site boundary to include Tesco's land holding subject to confirmation of an agreed statement of common ground between the parties." A Statement of Common Ground including a proposed boundary amendment has now been concluded between the parties. Further information will be provided separately on this matter next week and your guidance sought on how best to proceed including whether or not to also include it in a further updated Interactive Policies Map.

### **Duty to co-operate**

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

*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.*

**LPA Response:** The list of duty to cooperate bodies that Ealing has engaged is as follows:

- Affinity Water
- LB Brent

- Environment Agency
- GLA/Mayor of London
- LB Hammersmith & Fulham
- LB Harrow
- LB Hillingdon
- Historic England
- LB Hounslow
- National Gas Transmission
- National Grid
- National Highways
- Natural England
- Network Rail
- NHS Healthy Urban Development Unit
- NHS Property Services
- Ministry of Defence
- Old Oak and Park Royal Development Corporation
- Sport England
- Transport for London
- Thames Water

Strategic cross boundary matters are relatively limited given the role of the London Plan in allocating development targets. However, the Council would highlight representations from LB Hillingdon about the allocation of Gypsy and Traveller accommodation, and changes requested by OPDC to policies concerning North Acton, which are being addressed through a Statement of Common Ground, expected to be submitted by the end of February 2025.

Evidence of on-going discussions on strategic matters vary according to the matter and the consultee and are largely documented in the Revised Duty to Cooperate statement {S22}. These include continuous engagement with neighbouring boroughs and LPAs (particular under the auspices of the West London Alliance), regular meetings with the GLA, and more focused engagement on the draft plan with most national bodies.

***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.*

**LPA Response:** Regards a. and b., Ealing has interactions and co-operation with neighbouring boroughs and the GLA at multiple levels, and regularly shares progress on local plan development at network meetings of West London Chief Planning Officers and of a practitioner group of planning policy managers and principal officers, as well as with specific consultees as appropriate. These and other bodies with whom Statements of Common Ground have been or are being agreed have found it most useful therefore to address discussions specifically to the provisions of the draft plan.

Ealing has therefore been guided by the advice in NPPG Paragraph: 011 Reference ID: 61-011-20190315 that:

*"The level of cooperation detailed in the statement is expected to be proportionate to the matters being addressed. The statement is expected to be concise and is not intended to document every occasion that strategic policy-making authorities meet, consult with each other, or for example, contact prescribed bodies under the duty to cooperate. The statement is a means of detailing key information, providing clear signposting or links to available evidence on authorities' websites."*

Statements of Common Ground are therefore set out as bilateral agreements between the Council and one other body that concern specific recommendations for amendments to the draft plan, subject to agreement by Inspectors.

Statements of Common Ground with the GLA/Mayor of London, Hillingdon Council, Historic England, and the Old Oak and Park Royal Development Corporation are at an advanced stage and should be complete before the end of February 2025.

Regards c. and d. as of 10 January 2025 there are no outstanding matters of disagreement or evidential omissions identified in completed Statements of Common Ground. However, the Council will provide a further update once the outstanding Statements of Common Ground have been successfully concluded.

### **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.*

**LPA Response:** The Statement of Common Ground with GLA is currently in the latter stages of agreement and so the Council will submit an answer to this question alongside the statement before the end of February 2025.

### **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?*

**LPA Response:** Overall yields are presented in aggregate as part of the 5YHLS and this demonstrates that the plan does make provision to meet relevant housing targets. However, these are not considered to form a preferred basis for development management purposes because not all are the subject of detailed capacity analysis but are instead based upon general floor area ratio calculations. While this information will be provided as requested, the Council's preference is that it does not form part of adopted site allocations.

Commercial uses can be interpreted to include or exclude industry depending on the circumstances, but strategic policies for industry and other commercial uses are based on the retention of provision on existing sites and its intensification where appropriate. This reflects renewed uncertainty in these sectors as to the form and level of provision required by the market and the available resources of land particularly given competition by housing. Specific floor areas for commercial uses in allocated sites would therefore be difficult to produce and should not be necessary for the strategic planning purposes of the current local plan.

**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.*

**LPA Response:** As per the reasoning provided in response to IQ4 above, this information should be completed before the end of February 2025.

## **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?*

**LPA Response:** Yes.

**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.*

**LPA Response:** As per the reasoning provided in response to IQ4 above, this information should be provided before the end of February 2025.

**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?*

**LPA Response:** The evidence base used to assess the need for future Gypsy and Traveller accommodation is the most up to date available. Ealing Council used the West London Alliance (WLA) Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) published in 2018 {EB80} and information from the borough-wide pitch assessment conducted by Three Dragons and published in 2023 {EB74}. Further work is also currently being undertaken in conjunction with the GLA although the study has yet to be published.

West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment, 2018 {EB80}:

Opinion Research Services (ORS) were commissioned by the WLA to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in the WLA London Boroughs of Barnet, Brent, Ealing, Harrow, Hillingdon and Hounslow. It was consistent with national policy and guidance related to identifying needs. Hillingdon and Hounslow were not included in the commission, however ORS completed separate GTAAs for them using the same methodology, so the outcomes of their GTAAs were integrated into the 2018 report.

Gypsy and Traveller Pitch Provision: Site Assessment, 2023 {EB74}:

Ealing commissioned Three Dragons to identify sites required to meet future Gypsy and Traveller accommodation needs in the borough. This work was critical for meeting future accommodation need as there is no opportunity to increase capacity at the current Traveller's site at Bashley Road.

The Gypsy and Traveller Pitch Provision Report (GTPP) drew on the WLA GTAA as well as national and regional planning policy guidance and was used to inform the development of Ealing's Gypsy and Traveller policies and preferred site allocation in the draft Local Plan.

The Bashley Road Traveller community were consulted on three separate occasions to discuss their needs and preferences for a new Gypsy and Traveller site. Further details of these consultations can be provided if required.

GLA London-wide Gypsy and Traveller Accommodation Assessment:

The Greater London Authority (GLA) is currently conducting a London-wide Gypsy and Traveller assessment that will update their last study published in March 2008. It is expected to be published during 2025 as part of a review of the London Plan. Initial findings confirm the need for an additional six pitches to meet future Gypsy and Traveller accommodation in Ealing, the same number as assessed in the 2018 GTAA. The Council is committed to continue working with the Mayor of London on updating this evidence as part of a London-wide Gypsy and Traveller accommodation needs assessment. This will feed through into a revised need for gypsy and traveller pitches when the new London Plan is eventually published. It is understood that will not happen before 2027.

***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?***

**LPA Response:** The 2018 WLA GTAA assessed a need for six additional permanent pitches to meet the future accommodation needs of Ealing's Gypsies and Travellers up to 2041. Ealing's draft Local Plan covers a 15-year period from 2024 to 2039 and therefore covers almost the same period as the WLA GTAA assessment. Any changes to assessed need will be addressed in the next Local Plan review.

The Gypsy and Traveller Pitch Provision report (2023) firstly considered whether there was capacity to expand the existing Gypsy and Traveller site at Bashley Road to meet future need. Given the constraints of the site with a railway line on one side and industrial development on the other boundaries, it was concluded that there was no capacity to expand the site with more pitches.



The Bashley Road community were asked if they would be prepared to move to a completely new, larger site that would incorporate the additional six future pitches required. They were unanimous in their refusal to leave Bashley Road, but said they would consider a new pitch to meet future needs for expansion.

The Three Dragons report therefore primarily concentrated on finding and assessing suitable sites that could accommodate at least six permanent pitches.

A total of 16 sites were identified by Ealing officers for assessment. Following assessments of suitability, availability and achievability, three sites were put forward as the most suitable. Of these three sites, two were taken forward for a Reg 18 public consultation on 23 August 2023. The consultation responses informed the decision to include Kingdom Workshop as a proposed development site to accommodate a new Gypsy and Traveller Site in the draft Local Plan at Reg 19. The decision to include this as the preferred site rather than the Northolt Driving Range was largely based on feedback from the Bashley Road residents who expressed a strong preference for the site located within the Down Barns Farm area, and representation from the London Gypsies and Travellers organisation.

The proposed site at Kingdom Workshop (09NO) is seen as the most appropriate site to meet the future accommodation needs of Ealing's Gypsy and Traveller community. Work is being undertaken to acquire an interest in the land and to bring forward proposals for the design of the new site ensuring that the Gypsy and Traveller community is properly and effectively consulted.

Discussions with the Hillingdon Council regarding a new Gypsy and Traveller site have been ongoing throughout the Local Plan process as the proposed site is close to the borough boundary with Hillingdon. A Statement of Common Ground between Ealing and Hillingdon is in the final stages of completion. Hillingdon have set out their concerns regarding the proposed Gypsy and Traveller site due to it being situated in Green Belt, potential impacts on Down Barns Moat Ancient Monument, site access, transport access and availability. Hillingdon also contend that there are alternative sites that are more suitable.

Ealing's position is that the site is located on previously developed land (currently a lorry repair park of 20 years) and makes a negligible contribution to the NPPF's five Green Belt purposes. Moreover, the removal of the Green Belt designation from this part of the site will not adversely impact the Green Belt. Indeed, the proposed Gypsy and Traveller site comprises only 0.6% of the wider Green Belt parcel which includes the West London Shooting Ground.

Alternative sites were assessed and the proposed site, considering the views of the residents of Bashley Road, and the Council deem the Kingdom Workshop (09NO) as the most suitable.

In conclusion, the Council are therefore confident that the Local Plan will ensure that the future needs for Gypsy and Traveller accommodation will be met and that the plan itself is justified and effective.

### **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).*

**LPA Response:** This note will be provided before the end of January 2025.

### **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.*

**LPA Response:** Table 13 provides a split of the infrastructure projects that have been costed compared to those projects whose costs were unknown at the time of the preparation of the Infrastructure Delivery Plan (IDP). It shows that none of the flood management projects were costed at that time. Flood prevention and mitigation within Ealing is the joint responsibility of the Environment Agency, Thames Water, and Ealing Council as the Lead Local Flood Authority. As part of the preparation of the Infrastructure Delivery Plan, we engaged with all of the above stakeholders to identify planned and required flood management projects. These have been included in the IDP; however, their costs had not been sufficiently developed at that stage and were therefore not included.

**Table 13 Overview of costed projects**

| Sector                              | Total number of projects | Number of costed projects |
|-------------------------------------|--------------------------|---------------------------|
| Community facilities                | 2                        | 0                         |
| Green Infrastructure and Open Space | 5                        | 1                         |
| Sports and Leisure                  | 6                        | 6                         |
| Education                           | 8                        | 6                         |
| Health and social care              | 20                       | 14                        |
| Transport                           | 30                       | 30                        |
| Waste Management                    | 1                        | 0                         |
| Flood management                    | 12                       | 0                         |
| Emergency Services                  | 1                        | 1                         |
| Energy and Utilities                | 6                        | 2                         |
| <b>Total</b>                        | <b>91</b>                | <b>60</b>                 |

**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.

**LPA Response:** The infrastructure needs of each of Ealing's seven towns are presented in the respective town plan chapters. Infrastructure projects that have been identified as 'critical' do not necessarily relate to specific site allocations but are considered necessary to unlock new developments in their respective areas.

The council's town-led approach to planning is reflected in the introduction of a town forum model in our seven towns. More details can be found on the council's website: [Town forums | Ealing Council](#).

With the introduction of the Community Infrastructure Levy (CIL) in the borough, the council is planning to spend a portion of it on local priorities in the form of Neighbourhood CIL. The seven town forums will have an important role to play in guiding the allocation of NCIL funds.

In terms of specific site allocations, in most cases they provide an initial vision for future development, with more detailed planning / masterplanning work required as each project is further developed. This will inform the detailed infrastructure needs of each development and any specific infrastructure requirements for each site allocation.

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

**LPA Response:** As stated in Section 4.4 of the 'Infrastructure Delivery Plan Part Two: Infrastructure Delivery Schedule', the IDP is intended to be a 'living document' which the council intends to update on a regular basis, with the suggested frequency being every two years. It has been less than a year since the publication of the original IDP and there have been significant political, economic, and planning changes over that period which have caused a delay in infrastructure planning and delivery. Therefore, we do not have plans to undertake a comprehensive update in the immediate future.

We do plan to undertake a comprehensive update in alignment with the timescales of the London Plan review. The consultation on a complete first draft of the new London Plan is currently expected by Spring 2026. Our updated IDP will inform the council's response to the new London Plan consultation, for example in terms of the new London Plan's list of transport schemes (the equivalent of Table 10.1 of the current London Plan).

Ahead of that, we can provide updates on individual schemes of interest which have been further developed since the publication of the IDP including for example, the West London Orbital Railway, heat networks and Ealing's new regional park.

### **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:** This note will be provided by Monday 20<sup>th</sup> January 2025.

### **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.*

**LPA Response:** This note will be provided before the end of January 2025.

Finally, I hope the information contained herein is helpful. If any further clarification or information is required, please don't hesitate to get in touch.

Yours sincerely

*Steve Barton*

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