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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
EX9

My ref
CR/006

Extension
8056

Date
29 January 2025

Dear Sir/Madam,

**Examination of the Ealing Local Plan 2024-2039:
Ealing LPA's Response to Initial Questions,
Part 4, re. IQ3 and IQ1318**

Further to my note, dated Friday 10th January 2025, please find response below regarding the initial questions on the NPPF Dec 23 and the evidence base (IQ3) and a topic paper on the economy (IQ13).

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: The updated December 2023 Framework was accompanied by a [Written Ministerial Statement on December 19 2023](#) which summarises its changes:

"In summary, the new NPPF will:

- facilitate flexibility for local authorities in relation to local housing need;
- clarify a local lock on any changes to Green Belt boundaries
- safeguard local plans from densities that would be wholly out of character;
- free local authorities with up-to-date local plans from annual updates to their five-year housing land supply;
- limit the practice of housing need being exported to neighbouring authorities without mutual agreement;

- bolster protections from speculative development for neighbourhoods that develop their own plans;
- support self-build, custom-build and community-led housing; and
- cement the role of beauty and placemaking in the planning system."

The WMS and NPPF amendments are therefore clearly housing and Green Belt focused and are taken as having relevance to housing supply, Green Belt and Character policy and evidence.

Housing - The Plan does not seek to take advantage of any of the flexibility introduced in the December 2023 Framework to alter housing targets or to export local needs to any neighbouring authority. Instead, Ealing accepts the housing target set in the London Plan and the Plan makes full allowance for this. The council does not therefore consider that its housing evidence or policies are significantly affected by the December Framework.

Green Belt: The specific amendments to the Framework concerning Green Belt were as follows:

"Once established, **there is no requirement for** Green Belt boundaries ~~should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans~~ **to be reviewed or changed when plans are being prepared or updated. 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.**" (Para 145)

The December 2023 Framework therefore removed the implied requirement for LPAs to undertake Green Belt review as a reasonable alternative in satisfying development needs but maintained the established test of exceptional circumstances. Ealing's Plan makes recommendations for Green Belt changes only where they are supported by a review against the relevant Green Belt tests and fully evidences and justifies the proposed release to meet Gypsy, Travellers, Travelling Show people (GTTS) development needs.

Neither the plan nor its evidence base is therefore considered to be affected by the changes that the December 2023 Framework makes in relation to Green Belt policy and evidence.

Character: The December 2023 Framework provides that:

"...significant uplifts in the average density of residential development may be inappropriate if the resulting built form

would be wholly out of character with the existing area.” (Para 130)

This wording is important in that it departs from the consultation proposals of ‘significantly out of character’ and therefore sets a high bar for non-compliance. The Character evidence and the design policies set out in the Plan are explicitly contextual and any departures from established context are supported by strategy and evidence so that there are not considered to be any implications arising from this change.

Other changes: Other minor changes in the December 2023 Framework include provisions on beauty and visual clarity, neighbourhood planning and the presumption in favour of sustainable development, which relate primarily to development management rather than plan making processes; and support for energy efficiency and adaptation measures, which are considered to support the energy and reuse policies of the Plan.

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.

LPA Response:

{EB49} - [West London Employment Land Review, August 2022](#)
{EB56} - [West London Employment Land Evidence Report, May 2019](#)
The 2022 ELR sets out the borough’s industrial supply and demand over the plan period and functions as an update to the earlier 2019 West London Employment Land Evidence

This evidence base documents informs the borough’s industrial supply and management policies which are discussed in further detail below.

{EB50} - [Industrious Ealing - Inclusive economy baseline, July 2022](#)
{EB51} - [Industrious Ealing - Workspace audit, July 2022](#)
{EB52} - [Industrious Ealing - Affordable workspace study, July 2022](#)

Are three linked studies that set out the Borough’s industrial and employment strategy. All are built on the same supply and demand figures established in the 2022 WL ELR but provide further detail and recommendations on the impact of projected development upon people living and working in the borough going beyond the land supply function of the ELR.

These evidence base documents inform economic growth and employment policies across the borough and particularly the approach to affordable workspace.

{EB53} - [Town centre health check 2021/2022, July 2022](#)

Audits the strengths, weaknesses and opportunities of the Borough's town centres including retail, social infrastructure leisure and other uses, and informs individual town plans as well as town centres hierarchy.

{EB59} - [Ealing Town Centre Retail & Leisure Study, London borough of Ealing, April 2017](#)

{EB60} - [Retail and Town Centres Study Stage 2 Report, March 2018](#)

Audits retail and leisure uses across the borough.

{EB58} - [West London Alliance, Town Centre Study, Phases 1-3, 2023](#)

Considers broader retail and town centres policy as whole across West London and in the context of the new E use classes.

{EB55} - [Making Space: Accommodating London's Industrial Future, January 2022](#)

Considers the broader challenges for industrial supply in London in the future.

{EB54} - [Southall Employment Audit, June 2022](#)

Describes in greater detail the current state of employment and employment land in Southall. This informs the Southall town plan in Chapter 4 of Ealing's Local Plan.

{EB57} - Ealing Metropolitan Town Centre Growth Strategy (in progress, available soon)

Sets out in greater detail the strategy to grow office and employment within the Ealing Metropolitan Town Centre, particularly the interaction of the town centre with SIL/LSIS sites in Ealing and Acton.

{EB61} - [Ealing's Jobs and Skills Strategy 2024-2029, Ealing Council, September 2024](#)

{EB62} - [Ealing's Plan for Good Jobs, Towards An Inclusive Economy, Ealing Council, 2023](#)

Sets out the council's broader strategy for jobs, skills and inclusive economic growth. This is particularly relevant for individual planning applications but is also important context for other employment policies.

{EB63} - [Ealing's Economy after 6pm 2024-2029, Ealing Council, September 2024](#)

Informs the plan's approach to night-time uses.

{EB64} - [Commercial Strategy 2023-2027, Ealing Council, 2023](#)

{EB65} - [Land and Property Strategy 2023-2027, Ealing Council, 2023](#)

Set out the Council's approach to generating social, economic and environmental value from its own spending and assets.

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.

Industrial Evidence: Ealing's industrial need and capacity is identified in the 2019 West London Employment Land Evidence [EB56] and was subject to an update and sense check in the 2022 ELR [EB49]. The 2022 update concludes that: "in large part the conclusions of the 2019 West London Industrial Evidence remain supported by this latest update" (p50) and reconfirms the industrial demand and supply baseline set out in the earlier study.

The 2019 study identified a net uplift of industrial need of 1ha for Ealing based upon its political boundary and therefore including the Ealing portion of OPDC. Ealing LPA's industrial needs will therefore be somewhat lower than this, but there is no specific apportionment set through the London Plan. This uplift is expected to be met through intensification of existing industrial sites in line with the London Plan.

This demand in Ealing is projected in (ha) based upon the 0.65 plot ratio used in the London Plan:

Logistics	Manufacturing	Building trades	Transport	Other	Total
15.2	-19.1	2.9	-1.6	3.6	1

These figures are calculated from a combination of employment and GVA projections, in line with government guidance.

Spatial Policy: The borough as a whole functions as a single industrial market for most uses, and as a component of the broader London industrial market. Industrial needs are not, therefore, disaggregated by location and there are no plan targets by town or other geography.

The nature of identified needs suggests the vast bulk of growth will be in larger, consolidated uses such as warehousing and logistics. Growth is therefore expected to be concentrated in larger, consolidated industrial areas, primarily within the borough's two industrial designations of Strategic Industrial Land (SIL) and Locally Significant Industrial Land (LSIS).

Ealing serves a strategic role for industrial functions within London and very little of the identified need is driven by population growth within the borough or other aspects of the local plan strategy itself. However, spatial policies do identify particular employment priorities in different parts of the borough, and these are expected to influence the type of space that is provided rather than its overall quantum. For example, SIL is mainly concentrated along the A40 corridor and will see the bulk of

logistics growth, and LSIS is located closer to town centres and is expected to see more employment dense growth.

Background loss of some smaller industrial locations, primarily on non-designated sites, is expected to continue, and the effect upon overall supply to be compensated by intensification and consolidation on designated sites. The plan makes a number of place-specific proposals for industrial land, mainly in the form of site allocations.

Conclusions: Policies in Ealing's Local Plan reflect the evidence of need to maintain and intensify Ealing's existing supply of industrial land. These acknowledge that not all industrial land serves the same purpose and accords with the London Plan in maintaining SIL for exclusively industrial intensification (Policy E4), LSIS for mixed intensification subject to masterplanning and where this will better meet industrial needs (Policy E6) and making loss on non-designated sites subject a sequential test.

The Plan also provides detailed evidence of employment, training, and income needs across the borough which will shape the type of space that is needed across the borough, and includes a range of policies to deliver this, particularly the affordable workspace requirement (Policy E3).

c. Any changes to existing industrial land designations resulting from the Plan (including boundary changes).

Changes to industrial designations are primarily set out in the Atlas of Change {S17} as follows (by Atlas Reference Number):

- 39. Johnson Street - Area to be added back to LSIS to better deliver industrial intensification.
- 40. Featherstone Terrace - Minor adjustment to remove area of land that is separated from LSIS and does not contribute to the industrial capacity of the site.
- 41. Bridge Road Industrial Estate:
 - Charles House - Area to be added back to LSIS to better deliver industrial intensification.
 - Toplocks - Boundary adjustment to reflect residential planning permission, now completed.
- 42. Designation of the former golf driving range in Northolt as Locally Significant Industrial Site.
- 43. Designation switch from SIL to LSIS – industrial estates west of Hanger Lane.

In addition, one boundary revision was proposed as part of the Regulation 19 consultation and is suggested as modification SMM154 [S24 & S24b] 'Remove the SIL designation from part of the existing

Greenford Quay development that extends south of the Grand Union Canal'. This reflects the residential planning permission that has now been completed.

These changes represent a small net gain in the extent of designated industrial land in Ealing and a potentially more significant gain in industrial capacity as new designations will consolidate larger designated sites, and the removals reflect mapping errors or historic permissions on sites that therefore provide no existing industrial capacity.

Yours sincerely

Steve Barton

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