

GLA/Ealing Statement of Common Ground

The table set out below covers the principal outstanding matters from the Mayor's representations and Ealing's proposed responses.

| Reference | Summary of issues | Ealing response | GLA response |
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| Housing | Not possible to understand if the draft Plan meets housing target between 2019 and 2029 without site capacities. Plan should make clear housing delivery between 2019 and 2024. If there has been a shortfall, the deficit will need to be made up by the end of the LP2021 housing period by 2029 | <p>This position is confirmed via Ealing's latest Five Year Housing Land Supply Position Statement and Housing Trajectory, dated November 2023, and published alongside and mirroring the content of the Regulation 19 plan. Although site capacity figures are omitted from the Regulation 19 plan itself, these sites and the assumed capacity figures form a key input into the position statement.</p> <p>Both the 5YHLS and Trajectory account for past delivery, carrying forward into Ealing's requirement any deficit arising since 2019/20, reflecting the base date of the London Plan.</p> <p>The outputs contained in the position statement demonstrate that by the end of the Local Plan period supply when measured cumulatively will exceed Ealing's overall requirement. Significantly the results of the trajectory indicate that the projected cumulative delivery is expected to meet the 10-year requirement before the end of the London Plan target period in 2028/29.</p> | <p>Ealing's Position Statement may form part of the Local Plan evidence base and while it is a material consideration in planning terms, it does not carry the same level of material weight as given to a Development Plan Document. For that reason, it is important that capacity figures are provided for individual site allocations. As currently written, the proposed uses for site allocations remain ambiguous, create uncertainty and provide no detail about how proposed development is likely to contribute towards meeting established need. (See Policy H1B2 and D3E but especially Policy D1B3 which states that boroughs should follow a designed approach to establish optimised site capacities in site allocations).</p> <p>LP2021 Policy H1B1a makes it clear that Development Plans should allocate an appropriate range and number of sites in order to achieve their LP2021 housing targets. Paragraph 4.1.10 of the</p> |

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| | | | <p>LP2021 also makes it clear that boroughs should encourage ambitious and achievable build-out milestones for all development proposals to achieve their housing targets. To be consistent with the LP2021 LBE should set capacity assumptions in their site allocations to demonstrate the ability to meet housing targets and how it is expected to play out over the Plan period.</p> <p>In addition, it is still not clear if there has been a shortfall in housing delivery between 2019 and the start of the Plan period. If there has been a shortfall, it is not clear how this has been dealt with. Any shortfall should be added to the remaining years up to 2029. Further clarification on this matter is considered necessary and would be welcomed.</p> |
| Affordable Housing | On average, schemes that were referable to the Mayor that followed the Fast Track Route provided 44% affordable housing in 2022, whereas viability tested schemes provided only 28%. Applicants also typically seek to demonstrate the existence of 'viability deficits' through the viability assessment process and use these as a credit in viability review mechanisms | <p>The viability tested schemes referred to would necessarily include those that suffer from genuine viability pressures and this would reduce the average AH contribution of schemes that follow this route.</p> <p>The 40% threshold has been viability tested in Ealing and is considered a material step towards delivery against the identified strategic target of 50% delivery.</p> | Setting the threshold level above the Mayor's 35% for schemes on privately owned land means that it may be more difficult for proposals to achieve this level of affordable housing and in turn may result in a greater number of planning applications following the Viability Tested Route (VTR). The proposed approach could result in |

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| | <p>which can reduce the likelihood that additional affordable housing is secured over the lifetime of the development.</p> <p>There is a significant risk that the borough would secure fewer affordable homes through a blanket 40% requirement than could be achieved through the 35% threshold for sites that are not on public or industrial land. The Mayor is therefore concerned that, in reality, a headline threshold target would achieve less than a more feasible, lower one.</p> | | <p>lower levels of affordable housing being secured or reduce the effectiveness of viability reviews.</p> <p>In December 2024 the Mayor published a practice note on Accelerating Housing Delivery.¹ The section headed 'Local plan affordable housing policies' is clear at paragraph 3.8 that boroughs setting their own threshold level for affordable housing risk the implementation of the London Plan threshold approach and in those instances will be raised as general conformity objections.</p> |
| Affordable Housing | As currently written, it isn't clear if the 40% threshold is intended to be applied to all residential proposals and more clarity on this point is considered necessary. To be consistent with the LP2021, Policy HOU should include that the thresholds for affordable housing are set at 50% on publicly owned land where there is no portfolio agreement with the Mayor and where the introduction of residential development into industrial sites would result in a loss of industrial capacity. | <p>HOU C) sets out that the new threshold applies only to that defined in "Policy H5 B 1)" which sets only the general threshold, not that required or publicly owned land etc.</p> <p>For the sake of future-proofing this could be altered to "The fast track route for development other than on public or designated industrial land..."</p> | Noted and agreed. |
| Industrial monitoring | The Mayor strongly suggests that LBE commits to regularly monitoring industrial capacity in the borough over | The Monitoring Framework in Appendix 1 sets indicators for; | The proposed industrial monitoring is noted and welcomed. The |

¹ <https://www.london.gov.uk/sites/default/files/2025-01/Accelerating-Housing-Delivery-Planning-and-Housing-Practice-Note-December-2024-2.pdf>

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| | the life of the Plan to ensure that proposals for development do not result in borough-wide deficits in industrial capacity. Doing so would help to meet the requirements of Policy E4C of the London Plan 2021, which makes it clear that industrial capacity should be planned, monitored and managed. | <ul style="list-style-type: none"> - Net additional industrial floorspace in SIL and LSIS - Provision of affordable workspace - Change in total employment floorspace, by use class | intention should be to also monitor net changes in B2 and B8 capacity. |
| Policy E4 | It is strongly recommended that Policy E4 is amended to provide a firmer focus on increasing industrial capacity over the life of the Plan, especially those related to Class B, where LBE is able to exert control. | <p>Amend E4 H i) “There is no identified <u>need for industrial uplift, particularly the B Classes and no</u> capacity for release of industrial space in Ealing over the plan period.”</p> <p>Amend para 5.29</p> <p>“Ealing has a finite supply of industrial land with which to meet <u>increasing</u> industrial need...”</p> | The proposed amendment is noted and welcomed. However, it is also considered necessary that LBE provides a focus on (in terms of supporting and monitoring) Class B uses as light industrial ones are now included in Class E and can change use without requiring planning permission. |
| Industrial capacity | The draft Plan proposes masterplans for three areas of SIL in the site allocations, to deliver what is described, unspecifically as, ‘industrial-led mixed-use intensification’. This raises uncertainty and the draft Plan should establish why these particular sites have been selected. The associated site allocations for them should set out the industrial floorspace to be reprovided and the industrial Use Classes to be accommodated. | <p>Additional detail on the masterplanning process should be provided in LV E6 as follows;</p> <p>D ii)It meets objectively assessed industrial needs, <u>and delivers uplift as appropriate</u></p> <p>5.32 LSIS has been identified along with town centres as being essential to improving job quality and earnings in Ealing and applications on LSIS should therefore be supported by a comprehensive economic strategy demonstrating how they will help to deliver the council’s economic growth strategy. High</p> | <p>Clarity on the industrial masterplan process is noted and welcomed.</p> <p>The proposed amendment is noted, however, LBE have not responded to the issue regarding the reconfiguration of SIL in the borough. LBE should be clear how much SIL would be lost as a result of proposed masterplanning and the downgrading of the Hangar Lane Gyratory SIL and should broadly establish how that could</p> |

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| | <p>We do not currently consider that the intention in the draft Plan to downgrade the Hangar Lane Gyratory SIL to LSIS is underpinned by evidence which would support it. The draft Plan suggests that downgrading the site to LSIS will facilitate the reintroduction of industrial uses through enabling development, but it is unclear what this would mean in practice and how it would meet key requirements. The Mayor considers that a plan, monitor and manage approach is required to allow the potential downgrading of the site (particularly given its positive attributes for SIL).</p> <p>Policy E6 should be amended so that the intention to accommodate businesses with high job densities does not happen at the expense of important industrial activities such as those which fall within Class B8</p> | <p>employment density and economic value uses are those conforming uses that also make a substantial contribution to the borough's employment and economic objectives. <u>Masterplanning on LSIS will be based upon a two-stage masterplanning process that is proportionate to the size of the area and the nature of its industrial uses.</u></p> <p><u>5.33 Stage One will determine objectively assessed industrial needs within the LSIS, which are those that are demonstrated by 1) evidence of industrial supply and demand and 2) wider spatial context and non-conforming uses.</u></p> <p><u>5.34 Stage Two of the masterplan process sets out the detailed proposals for the area in the form of:</u></p> <ul style="list-style-type: none"> - <u>Delivery of the needs identified in Stage One will be met.</u> - <u>The proposed areas for intensification, co-location and/or release for housing/other uses, and the broad quantum of industrial capacity that would be delivered.</u> - <u>Areas for industrial intensification, colocation and residential</u> - <u>Capacity of these areas</u> - <u>Design of industrial areas and buildings</u> - <u>Analysis of access and servicing, Agent of Change, place making, public transport and local services, decant and phasing, infrastructure requirements, viability etc</u> | <p>be made up either on the remaining SIL in these areas or elsewhere in the borough. In order that this can happen LBE should establish the baseline equivalent of what industrial capacity would be lost in terms of Class B use and should then plan to meet this through intensification. The correct approach is provided in Policy E7 of the LP2021 and we urge LBE to follow that. The intention to produce masterplans is acceptable but the draft Plan should lay out generally where losses of SIL will occur and where the intention is to reprovide it. LBE should note that to be consistent with Policy E7 of the LP2021 proposed boundary changes to designated industrial land should be established in the Development Plan and not through masterplans.</p> |

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| | | <ul style="list-style-type: none"> - <u>Environmental improvements necessary for industrial uplift/co-location</u> <p>5.334 Mixed intensification offers the opportunity for significant industrial and housing uplift as well as improvements to quality of place, and economic and employment benefits for Ealing. Mixed intensification also has important potential to diversify and modernise Ealing's industrial provision particularly for smaller industrial uses <u>spaces</u>. However, there is no presumption in favour of mixed intensification <u>on LSIS</u> and not all industrial uses will be able to be accommodated as part of mixed development.</p> <p>5.34 In line with the requirements of the London Plan, any proposals for mixed intensification must be brought forward through a masterplan process that is led by the industrial needs of the area, and which fully addresses the placemaking and infrastructure needs of the new development.</p> | |
| Policy E7 | To be consistent with Policy E7D of the LP2021, the allocations should be clear that the industrial elements of proposals are to be delivered ahead of any residential components and the implementation of the Agent of Change principle applied to ensure that industrial activity within the areas of SIL can effectively operate 24 hours a day, seven days a week. | The local plan does not need to repeat any of these points in order for them to apply to development within Ealing and the proposed policy does not alter these provisions in any way. | This is noted, however clarity on both points is considered worthy of inclusion to avoid unnecessary challenges later on. |
| Town Centres | The draft Plan should apply a town centre first approach towards office | SD7 is written specifically to address 'development proposals' so it should not | The proposed modification is noted and welcomed. |

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| | <p>development as set out in Policy SD7 of the LP2021. This means that where there is a clear need for office development within LBE, the Council should allocate sites within town centres considering site suitability, availability and viability, with limited exceptions for existing viable office locations.</p> | <p>require reformulation in order to apply to development in Ealing. Those site allocated for office in the plan are all located in existing town centre office locations, particularly Ealing MTC.</p> <p>SP 4.1 B. States that development should be directed to ‘sustainable locations that are well connected to sustainable transport modes or within close proximity to town centres, and thus deliver patterns of land use that reduce the reliance on the car and facilitate making shorter and regular trips by walking and cycling.’</p> <p>Propose adding to the supporting wording;</p> <p>‘Town centres do not just constitute the retail hierarchy, but also make retail and employment provision alongside the public and social life of the borough, <u>and form the primary focus for office development.</u>’</p> | |
| GB/MOL | <p>The proposed site allocations do not provide detail on potential development capacities. In the absence of that information, it is not clear if LBE could meet the borough’s growth needs over the lifetime of the Plan without relying on GB and MOL sites. It also means that one cannot determine what the GB and MOL sites could contribute in terms of housing numbers and other growth.</p> | <p>Ealing’s future land supply position is addressed via Ealing’s latest Five-Year Housing Land Supply Position Statement and Housing Trajectory, dated November 2023. Although site capacity figures are omitted from the Regulation 19 plan itself for all allocations including GB and MOL sites, these sites and the assumed capacity figures form a key input into the position statement.</p> <p>The primary purpose of allocating a small number of GB/MOL sites is to enable development that will improve the wider</p> | <p>See earlier comment above in relation to housing. The Position Statement is not a Development Plan Document and carries less material weight in planning terms. For that reason and to provide more certainty it is considered necessary that the site allocations should include capacity assumptions so that they can be fully considered and assessed as part of the Plan making process.</p> |

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| | | <p>green open spaces or provide needed sports and leisure facilities.</p> <p>The rationale for each of these site allocations is outlined in the Green Belt and Metropolitan Open Land Review Stage 2 report. The purpose of these site allocations is not to meet housing need, although any residential enabling development will make a modest contribution towards that goal.</p> | <p>Currently, the site allocations are ambiguous. If these allocations are to 'improve the wider green open spaces' or to 'provide needed sports and leisure facilities' this should be made clear in each. If the release of Green Belt and Metropolitan Open Land Sites is not premised on residential development then it should be made clear what the strategic reason behind their proposed release.</p> |
| GB/MOL | Furthermore, the Mayor questions the proposals to de-designate some areas which are not included in site allocations. | <p>It is not clear which areas this comment relates to. We assume it relates to GB/MOL corrections which are not site allocations.</p> <p>In our approach, we have clearly distinguished between GB/MOL corrections (which are not included in site allocations) and GB/MOL site allocations.</p> <p>The council's rationale for undertaking boundary corrections is addressed within the Green Belt and Metropolitan Open Land Review Stage 2 report. Importantly, the council has demonstrated that exceptional circumstances exist to justify such corrections, in the same way that this has been demonstrated for the allocated sites.</p> | <p>LBE's proposed approach has clearly distinguished between what is considered to be GB/MOL corrections and site allocations.</p> <p>The Mayor's response queries why for example, there is no explanation behind the proposed intention to release part of MOL 23 which is currently a recreation ground. (Map37 in the Atlas of Map Changes).</p> |
| GB/MOL | The LP2021 sets out a strategic approach for all London boroughs to avoid resorting to the capital's valuable GB and MOL for development opportunities. LBE | The Green Belt and Metropolitan Open Land Review Stage 2 report explains the specific rationale for the allocation of each GB/MOL site. The primary objective of | Changes to the NPPF and new government guidance in relation to green belt and grey belt need to be taken into consideration on these matters, recognising that this plan |

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| | should adopt a 'brownfield first' approach exhausting all suitable brownfield development opportunities before considering the potential for development on GB and MOL sites. | these allocations is to improve the wider GB/MOL parcels. | is being considered under the previous NPPF. |
| GB/MOL | In order that the draft Plan is in general conformity with the LP2021, LBE will need to establish the exceptional circumstances that are required by national policy before it can release and reconfigure the borough's GB and MOL. | This is discussed in the Green Belt and Metropolitan Open Land Review Stage 2 report. | This is noted. |
| 19EA Gurnell Leisure Centre | The proposed allocation lies completely within MOL and is currently home to a leisure centre. As set out in Policy G3 of the LP2021, MOL is afforded the same level of protection as Green Belt land. The proposed use is for residential development which the Mayor considers is inappropriate development in MOL. | The Green Belt and Metropolitan Open Land Review Stage 2 report discusses the exceptional circumstances for the replacement sports and leisure centre and the enabling residential development on this site. | <p>This is noted and it will be for the inspector to determine whether exceptional circumstances have been demonstrated.</p> <p>For clarity, it is noted that the GLA does not consider the changes to the NPPF in December 2024 to apply to MOL and the position therefore needs to be updated in relation to the summary of issues. Notwithstanding this, as the local plan is being considered under the previous NPPF, that earlier approach does align with London Plan Policy G3 Metropolitan Open Land.</p> |
| 04GR Westway Cross | The existing use is a retail park and a large part of the site lies within MOL. As set out in Policy G3 | As discussed in the Green Belt and Metropolitan Open Land Review Stage 2 report, the site is brownfield land which | This is noted and it will be for the inspector to determine whether |

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| | <p>of the LP2021, MOL is afforded the same level of protection as Green Belt land. The proposed use is for residential-led mixed use development including retail and office space which the Mayor considers is inappropriate development in MOL. However, LBE are proposing a MOL boundary change which would remove the designation and this will require evidence to demonstrate exceptional circumstances. LBE should also note that office development should be part of a town centres first approach as set out in Policy E1 of the LP2021.</p> | <p>includes several retail and food outlets as well as the entirety of the shopping centre's car park.</p> <p>As the site has been previously developed, there will be no loss of green open space. The site clearly does not function as MOL and the incremental development that has taken place over the years has considerably changed the site's function and appearance since its original MOL designation.</p> | <p>exceptional circumstances have been demonstrated.</p> <p>For clarity, it is noted that the GLA does not consider the changes to the NPPF in December 2024 to apply to MOL and the position therefore needs to be updated in relation to the summary of issues. Notwithstanding this, as the local plan is being considered under the previous NPPF, that earlier approach does align with London Plan Policy G3 Metropolitan Open Land.</p> |
| 04NO Northolt Driving Range | <p>The site lies completely within the Green Belt (this is not currently recognised in the allocation which should be amended to reflect this) and has most recently been used as a sports facility with a golf driving range. In Policy G2 of the LP2021 it is clear that the Green Belt should be protected from inappropriate development. The proposed use is for an employment-led mixed-use scheme which the Mayor considers is inappropriate development in the Green Belt. It is clear the site is being considered for industrial and residential use but it is not clear</p> | <p>As discussed in the Green Belt and Metropolitan Open Land Review Stage 2 report, the land south of Rowdell Road has changed significantly since it was originally designated Green Belt many decades ago and it currently makes no contribution towards Green Belt purposes.</p> | <p>Changes to the NPPF and new government guidance in relation to green belt and grey belt need to be taken into consideration on these matters, recognising that this plan is being considered under the previous NPPF.</p> |

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| | how the site could contribute towards the borough's industrial needs over the plan period. It is noted that LBE plan to release the site from its Green Belt designation, which would require exceptional circumstances to be established before that can happen. | | |
| 09NO Kingdom Workshop, Sharvel Road | The site lies completely within the Green Belt (this is not currently recognised in the allocation which should be amended to reflect this) and is currently used for lorry repairs. In Policy G2 of the LP2021 it is clear that the Green Belt should be protected from inappropriate development. The proposed use is for a Gypsy and Traveller site which the Mayor considers is inappropriate development in the Green Belt. It is noted that LBE plan to release the site from its Green Belt designation, which would require exceptional circumstances to be established before that can happen. | The Green Belt and Metropolitan Open Land Review Stage 2 report discusses the exceptional circumstances for the proposed Gypsy and Traveller site. | Changes to the NPPF and new government guidance in relation to green belt and grey belt need to be taken into consideration on these matters, recognising that this plan is being considered under the previous NPPF. |
| 16SO Warren Farm and Imperial College Land | The proposed allocation lies completely within MOL and covers 33.81ha. As set out in Policy G3 of the LP2021, MOL is afforded the same level of protection as Green Belt land. The proposed use is for | This is discussed in the Green Belt and Metropolitan Open Land Review Stage 2 report. | This is noted and it will be for the inspector to determine whether exceptional circumstances have been demonstrated. |



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| | an outdoors sports facility and nature reserve which the Mayor considers is inappropriate development in MOL. LBE is not proposing to remove the sites MOL designation. | | For clarity, it is noted that the GLA does not consider the changes to the NPPF in December 2024 to apply to MOL and the position therefore needs to be updated in relation to the summary of issues. Notwithstanding this, as the local plan is being considered under the previous NPPF, that earlier approach does align with London Plan Policy G3 Metropolitan Open Land. |
| Tall buildings | Figure DMP1 has some areas which overlap and there are other blank areas which seem to have no corresponding tall building definition. Neither are the tall building definition zones included in the borough's proposed policies map. Given this, the proposed approach does not currently meet the requirements of Policy D9 of the LP2021 and this should be addressed. We would note that there are only five different proposed building heights cited in Table DMP1, and therefore consider that this information could be better conveyed in a simplified form. | Accepted. The tall buildings thresholds will be implemented through the online policies map. | This is noted and welcomed by the Mayor in principle |
| Para 5.13 | The Mayor notes paragraph 5.13 of the draft Plan which states that the London Plan sets the clear presumption that tall buildings should be confined to specified sites and maximum heights. The presumption is not correct – rather Policy D9B of the | Accepted. | This is noted and welcomed by the Mayor. |

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| | <p>LP2021 specifically uses the terms 'locations' and 'appropriate' tall building heights. This implies some flexibility which could include a range of 'appropriate building heights' across an area. This is considered to be practical in terms of enabling boroughs to focus the tallest buildings in a particular more central part of a tall building zone and perhaps seeking lower building heights towards the edges of that zone (if that is for example what a borough wishes to do). In light of this, we advise LBE to use the term 'appropriate' instead of 'maximum' throughout the document. For practical reasons, the use of 'locations' rather than very specific sites tend to be preferable.</p> | | |
| Para 5.14 | <p>Paragraph 5.14 of the draft Plan states that where the acceptability of tall buildings is not established by the plan, as on industrial sites, applications which include tall buildings will be subject to comprehensive masterplanning in cooperation with the council. LBE should note that Policy D9B of the LP2021 makes it a requirement that suitable locations for tall buildings should be identified on maps in Development Plans. This means that additional locations for tall buildings cannot be established through Supplementary Planning Documents. We advise LBE to therefore include a</p> | <p>The proposition is not that new tall buildings can appear anywhere but rather that the suitability of designated industrial sites is not currently knowable in advance of masterplanning.</p> <p>Suggest that LSIS sites are identified as "locations potentially suitable for tall buildings" in the online policies map.</p> <p>This reflects the changes recommended for para 5.13.</p> | <p>This is noted and welcomed by the Mayor.</p> |

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| | modification which makes it clear that precise new locations for tall buildings identified in future masterplanning work will be incorporated as policy in the next iteration of the Local Plan as soon as reasonably possible. | | |
| 02EA, 03EA, 11EA, 13EA – buildings heights | On closer inspection the ‘maximum’ building height limits set out in site allocations do not appear to correspond to the tall building definitions in Figure DMP1. For example, site allocation 02EA Ealing Broadway Shopping Centre & Crystal House appears to be in tall building definition zone E14 (clarity on this should be applied to all site allocations). The tall building definition in that zone is set at 73.5m, which means that only proposals for buildings over that height are considered to be tall. However, the allocation seems to set the ‘maximum’ height for a tall building in this area at 42m which is below the tall building definition and is therefore not considered to be tall. The same issue occurs for site allocations 03EA, 11EA and 13EA but there may be more occurrences and LBE officers should check and clarify this. | <p>There are transcription errors between the recommendations of the TB study and the heights table that it contained (and which was copied across to DMP1). These are corrected in the submission version.</p> <p>In E14 this now sets the TB threshold at 9 storeys or 31.5m, which addresses those sites identified.</p> <p>However, site allocations may indeed set recommended heights that are lower than the tall buildings threshold on the basis of considerations of design, bulk and massing.</p> <p>This is clarified in LV D9 G which states that “The tall buildings threshold height is simply that and not a presumption that any height up to this is automatically acceptable”.</p> | Agreed. GLA officers will review DMP1 when it becomes available. |
| Kew WHS | The Mayor stated in his Regulation 18 response that LBE’s tall building approach should ensure that the Outstanding Universal Value (OUV) of Kew Gardens World Heritage Site (WHS) is preserved (including its | The use of Zone of Theoretical Visibility (ZTV) assessment was considered by the tall buildings study and it was not considered to add value at this stage of plan making given that the relevant views at Kew are panoramic rather than based upon defined viewing | Agreed. |

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| | <p>setting and key views from within). This is an issue which remains unresolved and the Mayor strongly advises LBE to follow the guidance set out in Policies HC2 and HC3 of the LP2021</p> | <p>corridors. This need for the assessment of actual development proposals is intensified by the accepted changes to Policy D9 and para 5.13 that move from specific heights on specific sites to recommended heights within defined locations.</p> <p>It is therefore for individual schemes to assess and justify their impacts on the WHS in line with the requirements of London Plan Policy HC2 C;</p> <p>“Development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the Heritage Impact Assessment.”</p> <p>This does not require repetition in Ealing’s local plan, but it is suggested that the point is emphasised in the supporting wording of Policy D9 as a replacement for the current para 5.13;</p> <p><u>“Tall buildings thresholds and the heights recommended in site allocations are not a presumption as to the suitability of these heights. Development proposals need to be assessed on their merit and site-specific impacts. Development proposals that have the potential to impact upon the setting of Kew World Heritage site should be supported by a relevant Heritage Impact Assessment.”</u></p> | |

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| | | Ealing notes also the support for our approach expressed by RBG Kew in its representation. | |

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| <p>Signed on behalf of Greater London Authority</p> <p>Lisa Fairmaner, Head of the London Plan and Strategic Planning</p>  | <p>Signed on behalf of LB Ealing</p> <p>Steve Barton, Strategic Planning Manager</p>  |
| <p>Date 28 February 2025</p> | <p>Date 28 February 2025</p> |