

EALING BOROUGH COUNCIL**Examination of the Ealing Local Plan 2024-2039 (the Plan)**

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MATTERS, ISSUES AND QUESTIONS

This document sets out the matters, issues and questions which need to be explored during the examination based on our reading of the plan and its evidence to date.

Our Guidance Notes, published alongside this document, provides information about the examination, the matters, issues and questions and, where necessary, where written statements can be provided to respond to the questions in this document.

Bracketed references to documents (e.g. [S1] refers to the reference number from the [examination library](#)).

Matter 1 – Procedural and Legal Requirements**Issue**

Whether the Council has complied with the relevant procedural and legal requirements.

Questions**Plan Preparation and Scope**

1. Has the Plan been prepared in accordance with the Local Development Scheme?
2. Has plan preparation been undertaken in line with the adopted Statement of Community Involvement, and have all notification, consultation, publication and submission requirements been met?
3. Is the scope of the Plan and how it relates to other adopted and 'made' plans clear (including neighbourhood plans)?
4. Is the position regarding the applicability of the policies in the Plan to land within the jurisdiction of the Old Oak and Park Royal Development Corporation (OPDC) and the relationship with the OPDC Local Plan [EB15] clear?

5. Does the Plan adopt a logical structure and clearly identified policies? For effectiveness, is modification needed to address any instances where duplicate policy references are used?
6. What is the plan period and is it justified?

Integrated Impact Assessment (IIA)

(Note - please focus on the legal compliance of the IIA. Any implications of the IIA on soundness of individual policies should be addressed elsewhere).

7. Has the IIA informed the preparation of the Plan? How have options been considered at each stage of preparation?
8. Is the methodology for the IIA appropriate?
9. How were the Framework Objectives at Table 1 of the IIA derived?
10. Are the baseline information and key considerations at Appendix B reasonable in terms of scope and being up to date?
11. Is the IIA robust in terms of the assessment of the likely effects of the submitted policies and allocations, scoring against the Framework objectives, consideration of reasonable alternatives and explanation of why the preferred Spatial Strategy and policies were selected?
12. Have any concerns been raised about the IIA and what is the Council's response?
13. How have the IIA objectives/guiding questions been amended in light of representations on land remediation/contamination issues on brownfield sites and heritage 'at risk' affected the assessment of Development Sites? How has that affected the Plan's approach and how is that evidenced?
14. Have the legal requirements for Sustainability Appraisal/ Strategic Environmental Assessment been met as part of the IIA process?
15. Overall, does the IIA meet all the relevant legal requirements?

Habitats Regulations Assessment (HRA)

16. How was the HRA carried out and is its methodology appropriate?
17. Are the National Network Sites identified for inclusion in the HRA correctly listed? How are non-National Network Sites treated and how has that informed the approach in the Plan?
18. What were the conclusions of the HRA and how have they informed the preparation of the Plan? Are the screening findings in the HRA justified and carried out on a precautionary basis?
19. Have potential in combination effects been assessed?
20. How has Natural England been involved and how have any concerns raised been responded to?
21. What are the practical consequences for delivering the planned growth given the HRA recommendation that any future development applications within the Borough should be subject to a detailed project level HRA? How is the recommendation reflected in the Plan?
22. Overall, does the HRA meet all the relevant legal requirements?

General conformity with the London Plan/ London Plan consistency

23. Overall, is the Plan in general conformity with the London Plan and how is that evidenced? Are any modifications necessary to address any inconformity?
24. Is it clear how the individual policies of the Plan relate to the those of the London Plan? Is there any duplication between the policies of the Plan and the London Plan in terms of their content?
25. Where a policy proposes local variation to a London Plan policy, is modification needed to the policy number/reference to ensure that the variation and the original policy can be distinguished, for clarity and therefore effectiveness?

Other matters

26. Does the Plan include policies in relation to the mitigation of and adaption to climate change, paying regard to the duty in S19(1A) of the 2004 Act?
27. How has the Council had regard to all other relevant matters set out in s19 of the 2004 Act and Regulation 10 of the Town and Country Planning (Local Planning) Regulations 2012?
28. In relation to those who have a relevant protected characteristic, how does the Plan seek to ensure that due regard is had to the three aims expressed in s149 of the Equality Act 2010?

Matter 2 – Duty to Co-operate (the Duty)

Issue

Whether the Council has complied with the duty in the preparation of the Plan.

Questions

1. Have all the genuinely strategic matters requiring cross boundary co-operation been identified?
2. Have the relevant bodies the Council is under a legal duty to co-operate with been correctly identified?
3. Has any neighbouring authority or prescribed body indicated that the duty has not been complied with in relation to any strategic matter? If so, what is the Council's response?
4. How is the co-operation evidenced and is the evidence adequate? Have all Statements of Common Ground been provided, consistent with the requirements of the Framework and the associated Planning Practice Guidance? If not, why?
5. Taken as a whole, does the Council's co-operation with neighbouring authorities and prescribed bodies on strategic matters with cross-boundary impacts amount to engaging constructively, actively and on an ongoing basis to maximise the effectiveness of plan preparation?

Matter 3: Vision, Objectives and Spatial Strategy

Issue [Focus – Policies SP1-SP4]

Whether the Vision and Spatial Strategy for the Borough is justified, effective, in general conformity with the London Plan, consistent with national policy and positively prepared.

Vision and Objectives

1. Is the Boroughwide Vision for the Plan ambitious, yet realistic, with appropriate alignment with the London Plan?
2. Are the objectives of the Plan clearly set out and measurable?

Spatial Strategy – general issues

3. Does the choice of Spatial Strategy flow logically from the conclusions of the IIA?
4. How have impacts beyond the Borough boundary been considered and reflected in the choice of Spatial Strategy?
5. Do Policies SP2-SP4 clearly set out deliverable planning related policy in a manner which gives certainty in future decision taking in the Borough and does the development plan as a whole make provision for all the measures which the implementation of the policies rely upon? How will the implementation of Policies SP2-SP4 be assessed?

Infrastructure

6. Is the approach to infrastructure planning in the Plan sound and in general conformity with the London Plan? Taken as a whole does it support a conclusion that the growth proposed by the Plan is deliverable? Specifically:
 - a. Has a comprehensive assessment of the infrastructure needs been undertaken along with the mechanisms that will be used for delivery and appropriate consideration of associated delivery risks for specific allocations?
 - b. Are the details regarding infrastructure delivery in Table SS1 and at Chapter 4, signposted in Policy 4.1(G)(ii), consistent with the evidence base?
 - c. Do key infrastructure dependencies align with planned growth (including where development is reliant on flood prevention and mitigation)
 - d. Are infrastructure dependencies and how will impact on the deliverability of the growth in the plan sufficiently understood?
7. Is there proportionate evidence on the potential effects of the growth in the Plan on the strategic and local road network? Will mitigation within the development plan be effective, including measures to promote active travel?
8. How has the availability of key public services influenced the Spatial Strategy, including emergency services, wider medical, and schooling been considered?
9. How has flood risk influenced the choice of Spatial Strategy? Is the approach to assessing risk robust and consistent with national policy?
10. Paying regard to Thames Water's Regulation 19 response, does the growth in the Plan take adequate account of water and wastewater infrastructure?

Greenbelt/MOL

11. Paying regard to paragraph 145 of the Framework, do strategic policies establish the need for any changes to Green Belt/MOL boundaries? If so, which ones and how? Are exceptional circumstances for any proposed changes to boundaries evidenced and justified? Are all detailed amendments to boundaries clear and addressed in the evidence?

Policy SP2

12. In terms of Policy SP2:

- a. what is its purpose and is its scope appropriate?
- b. what progress has the Council made in meeting becoming carbon neutral by 2030 and on what basis is the deliverability of this policy target justified?
- c. Does SP2.3 sufficiently reflect the diversity of the community of the Borough?
- d. is the inclusion of the 20-Minute Neighbourhood concept in general conformity with the London Plan and consistent with the Framework. What provisions does the Local Plan make to delivering this concept?

Policy SP3

13. In terms of Policy SP3:

- a. what is its purpose and is its scope appropriate?
- b. is the scope of the policy inclusive of all those living and/ or working in or visiting the Borough? What evidence supports your view?
- c. are any modifications required so that it adequately responds to tackling all of the matters falling within its scope?
- d. what, if any are the implications for discrepancy between Figure 14 of the ELP and Figure 6.6 of the OPDC Local Plan in terms of air quality matters?

Policy SP4

14. In terms of Policy SP4:

- a. what is its purpose and is its scope appropriate?
- b. are the ways of promoting good growth at SP4.1 (a) to (g) aligned and in general conformity with the London Plan?
- c. is the term 'character led and contextual approach' at SP4.1(D) clear? For effectiveness, should the Plan be modified to align with Policy D3 of the London Plan and refer to a 'design led approach'?
- d. in relation to town centres, is Policy SP4.2(J) implemented through the policies in the Plan? Is the approach consistent with National Policy and in general conformity with the London Plan, including Policy SD7?
- e. are the strategic place interventions at paragraphs 87-90 justified by the evidence and accurately summarised in the Plan? Do the policies in the Plan support the strategic place interventions?

15. Overall, is the spatial Strategy sound, having regard to the Borough's assessed development needs, the requirements of national policy, and general conformity with the London Plan?

16. Are any modifications needed to Policies SP2 to SP4 for soundness?

Matter 4: Housing

Issue [Focus – Policies SP4, HOU, H16, SSC]

Whether the Plan has been positively prepared and whether it is justified, based on up-to-date and reliable evidence, effective, consistent with national policy and in general conformity with the London Plan in relation to housing development management policies.

Questions

Housing – general

1. Does the Plan accurately and clearly set out a housing target that reflects the ten-year targets for net housing completions referred to in Policy H1(A) of the London Plan? Is the approach to setting the housing target after 2028/29 justified?
2. When read in conjunction with the wider development plan, is the submitted Plan clear about where residential development in the Borough will be supported in principle, including small sites?
3. Is the spatial distribution of housing development across the Borough justified and informed by the IIA?
4. Paying regard to paragraph 63 of the NPPF, is the size, type and tenure of housing needed for different groups in the community assessed and reflected in the planning policies?

Affordable Housing

5. In terms of Policy HOU:
 - a. what is the background to the policy and the evidence justifying it, including specific detailed thresholds?
 - b. how does the policy support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable in Policies CG4 and H4 of the London Plan?
 - c. is the interaction with Policy H5 of the London Plan clear in terms of setting out the instances where an affordable housing contribution will be sought? Paying regard to Policy H5(B)(2) and (3) is modification needed to clarify the position in relation to public sector and industrial land?
 - d. are the identified needs in Ealing referred to in HOU(A) clear? If identified needs are set out elsewhere in the evidence base and in guidance, should they be repeating in the Plan for effectiveness?
 - e. does HOU(B) repeat the requirement in HOU(A) and, if so, why is HOU(B) necessary?
 - f. are the expectations in terms of mix and tenure clear? Is the interaction with Policies H6 and H10 of the London Plan clear?

- g. are the requirements in HOU(C), including any variance to Policy H5(B)(1) of the London Plan, justified? Has the deliverability of adopting the thresholds been appropriately considered, including the applicability of the requirements to Build to Rent developments?
 - h. how does the evidence demonstrate that the 40% threshold will be effective in maximising affordable housing provision in Ealing? What is the Council's response to the GLA's representation setting out their view on the differences in provision between schemes following the fast-track route versus viability tested schemes?
 - i. in light of the stipulation in HOU(D) that provision should normally be made on site, is the Plan sufficiently clear on what would happen if a case was successfully made for off-site provision?
 - j. are the requirements in HOU(E) in relation to large scale purpose built shared living developments justified? Is a contribution in the form of conventional housing units on site deliverable in practice?
 - k. are the requirements in HOU(F) in relation to purpose-built student accommodation (PBSA) including any variance to Policy H15(4) of the London Plan justified? Has the deliverability of adopting the threshold been appropriately considered?
 - l. are the first two paragraphs of 5.22 detailing how applications for PBSA will be treated reflected in policy? If not, is modification needed to remove the text for clarity?
 - m. is the policy in general conformity with the London Plan?
 - n. are any other modifications needed to Policy HOU for soundness?
6. Does the Plan, and policies within it, support a positive and effective planning framework for managing development in Strategic Regeneration Areas?

Gypsies and Travellers and Travelling Showpeople

7. Is the approach of the Local Plan to Gypsies and Travellers and Travelling Showpeople justified, consistent with national policy, positively prepared, effective and in general conformity with the London Plan, and:
- a. in terms of planning to meet the future housing needs, what is the implication, if any of relying upon the findings of primary research which predates the joint Gypsy and Traveller Needs Assessment undertaken in 2018 [EB80]? What subsequent work has been done during plan preparation to verify that the findings of that earlier primary research on future needs is still valid for the plan period?
 - b. does the Plan respond appropriately to the needs of Gypsies in view of the most recent Smith v Secretary of State judgement and the relevant Planning Policy for Traveller Sites?
 - c. does the Plan respond to the needs of other members of the travelling community, including Travelling Show People and Boat People?
 - d. are the methodology and assumptions relied upon for assessing the accommodation needs of the Gypsy and wider travelling community, including in relation to transit sites sound and what are the reasons for your stance?
 - e. is there an effective policy to determine future windfall proposals?

Other Specialist Housing

8. In terms of the local variation to Policy H16 of the London Plan:
 - a. what is the background to the varied Policy H16, why is variation from the London Plan proposed and what is the evidence justifying it?
 - b. does the evidence support the position that there is no identified local need for shared living in Ealing, taking a restrictive approach, and limiting it Ealing Metropolitan Town Centre?
 - c. are the local housing needs of all groups of the Borough's communities clearly identified through evidence, consistent with national policy? Does the Plan have appropriate coverage for addressing them, bearing in mind the scope of the London Plan?
 - d. how will whether there is overconcentration of similar uses be judged given the intention to limit development of only Ealing Metropolitan Town Centre, and does Policy H16(ii) provide a clear basis for determining planning applications?
 - e. when read as a whole, will Policy H16 be coherent, and therefore effective, and in general conformity with the London Plan?
 - f. does Policy H16(B)(iii) repeat Policy H16(A)(2) in part? If not, what does 'not being detrimental to...the mix and cohesiveness of community use in the area' mean? Is the term clear and, if not, is modification needed to provide text explaining?
 - g. are any modifications needed to Policy H16 for soundness?

Small Sites

9. Does the Plan pro-actively support well-designed new homes on small sites?
10. In terms of Policy SSC:
 - a. what is the background to the policy and the evidence justifying it, including specific detailed thresholds?
 - b. paying regard to Paragraph 65 of the NPPF, is the policy consistent with national policy?
 - c. what assessment has been made of any potential impacts on delivery of small sites in the Borough?
 - d. are any modifications needed to Policy SSC for soundness?

Five-year Housing Land Supply Position

(Note- The Council has expressed a wish to confirm a 5-year housing land supply in their response to Initial Questions dated 10 January 2025 and has submitted the up-to-date housing land supply position and housing trajectory. Representors who have previously made representations on housing matters may refer to this evidence in responding to this Matter).

11. What is the latest information available on housing completions in the plan period?
12. Is there a trajectory identifying the components of housing land supply across the plan period with sufficient clarity? Is it based on up-to-date evidence?

13. Table 4 of the Five-Year Housing Land Supply Position Statement & Housing Trajectory (February 2025) [EB73] indicates that deliverability assumptions may not have been consistently applied in the housing trajectory. Is it clear which sites this applies to? Are the deliverability assumptions applied to sites realistic, justified, effective and consistent with national policy, including where there is a reliance on strategic and local infrastructure?
14. Is the approach to identifying and relying upon large windfall sites in years 6-15 of the housing trajectory justified, effective and consistent with national policy? What is the compelling evidence to show that windfall sites will provide a reliable source of supply as anticipated in the Plan?
15. In terms of the 'unconventional' pipeline supply, how has the assumption figure of 600 units been calculated and is this justified and effective?
16. Are the windfall assumptions justified, effective, consistent with national policy and in general conformity with the London Plan? Does the evidence demonstrate that at least 10% of the Borough's housing requirement will be delivered on smaller sites?
17. Has a five-year supply of deliverable sites been assessed separately for Travellers?
18. Do the policies in the adopted development plan as a whole provide appropriate contingency to ensure sufficient supply of homes?
19. Does the evidence demonstrate that the Plan, taken together with completions, commitments and allocations in the existing development plan for the area, will provide:
 - a. A five-year supply of deliverable housing land?
 - b. A supply of developable housing land for the plan period?
20. Are any changes required to the housing trajectory and, if so, would necessitate modifications to the Plan?

Matter 5: Economic Development

Issue [Focus – Policies SP4, E3, E4, E6]

Whether the Plan is justified, effective and consistent with national policy and in general conformity with the London Plan in relation to economic development.

Questions

Employment Growth

1. What is the identified need in terms of economic development and does the Plan provide a robust approach to identifying and bringing forward developments to meet the identified need?
2. Does the Spatial Strategy and the development plan as a whole:
 - a. manage Strategic Industrial Land exclusively for conforming use? Is any necessary consolidation proposed through the plan making process and, if so, is the nature and effect clear?
 - b. set out a specific strategy for Locally Significant Industrial Sites? Is the strategy in line with the London Plan?

3. Paying regard to the Council's response to Initial Questions dated 10 January 2025 [EX3]), is removal of a SIL designation from part of the existing Greenford Quay development a matter to be addressed through modification to the Plan? If so, is the modification necessary for soundness and would it be in general conformity with the London Plan?
4. How will industrial capacity against the expectations of the Plan be monitored?
5. How have the locational needs of different sectors been considered in arriving at the preferred Spatial Strategy and is the approach justified?

Affordable Workspace

6. In terms of the local variation to Policy E3 of the London Plan:
 - a. what is the background to the varied Policy E3, why is variation from the London Plan proposed?
 - b. what is the evidence justifying it, including specific detailed thresholds?
 - c. how does the varied policy relate to Policy E3(A) to (C) of the London Plan, which sets out the defined circumstances where planning obligations may be used to secure affordable workspace?
 - d. does the variation proposed in (F) to (H) alter the defined circumstances approach in favour of a blanket levy and, if so, is that a sound approach?
 - e. is the policy consistent with Paragraph 85 of the NPPF in terms of helping to create the conditions in which businesses can invest, expand and adapt and allowing the area to build on its strengths, counter weaknesses, and address future challenges?
 - f. are the requirements based on evidence of demand in the area including drawing on the experience of local workspace providers, paying regard to paragraph 6.3.5 of the London Plan?
 - g. are the requirements sufficiently flexible and appropriate to the diverse range of circumstances where they might apply?
 - h. is the reference to 'mixed use schemes' in Policy E3(F) precise and clear in terms of identifying which proposed developments will be subject to the requirement? To be effective, is modification needed to define a 'mixed use scheme'?
 - i. would the higher 10% levy for mixed use schemes in Policy E3(F) incentivise applicants to bring forward proposals for office and industrial schemes at the lower 5% and, if so, would that have implications for the effectiveness of the policy and/or the Spatial Strategy.
 - j. what would the implications be if, following consideration of the business plan required under Policy E3(G), onsite provision was not shown by an applicant to be viable and/or suitable? Would the ability to fall back on the levy be a disincentive for applicants to find onsite provision to be suitable and viable? Does that have any implications for the effectiveness of the policy? Is modification required to clarify the expectations in terms of onsite and offsite provision?
 - k. is modification required to clarify whether contributions will be based on a gross or net uplift?
 - l. are any other modifications needed to Policy E3 for soundness?

Industrial Land

7. In terms of the local variation to Policy E4 of the London Plan:
 - a. what is the background to the varied Policy E4, why is variation from the London Plan proposed and what is the evidence justifying it?
 - b. for consistency with Policy E4(A) of the London Plan, is modification required to Policy E4(H) to refer to a 'sufficient supply of land and premises'?
 - c. is the identification of 'industry, logistics and economic services' in Policy E4(H) aligned with Policy E4 more widely in terms of its identification of applicable land uses? Is the term 'economic services' sufficiently clear and understood?
 - d. is the term 'industrial intensification and reuse' sufficiently understood? For effectiveness, is modification needed to provide additional clarity?
 - e. what would the implications of industrial intensification and reuse being the primary consideration on the site of any existing employment use in Ealing be for other employment uses and development in the Borough? Are the potential impacts on competing land uses sufficiently understood?
 - f. paying regard to Policy E5(A) and the detailed criteria at (B) of the London Plan, how does the varied E4 and the wider plan amount to the proactive management of SIL?
 - g. is the sequential approach to non-designated sites in industrial use consistent with national policy when regard is paid to paragraph 127 of the NPPF?
 - h. are any other modifications needed to Policy E4 for soundness?
8. In terms of the local variation to Policy E6 of the London Plan:
 - a. what is the background to the varied Policy E6, why is variation from the London Plan proposed and what is the evidence justifying it?
 - b. paying regard to Policy E6(A)(1) of the London Plan is the variation (and other related policies in the Plan) justified by evidence in local employment land reviews considering the scope for intensification, co-location and substitution?
 - c. paying regard to Policy E6(A)(2) of the London Plan, do the varied Policies E4 and E6 make clear the range of industrial and related uses that are acceptable in the Borough's LSIS?
 - d. is the stipulation in Policy E6(B) that applications on LSIS sites will be determined according to the same principles SIL sufficiently clear? Does the differential treatment of SIL and LSIS in the hierarchy in Policy E4(ii)(a) and (b) contradict Policy E6(B)?
 - e. how will whether proposals have a high employment density and economic value be judged? Is the requirement clear, so it is evident how a decision maker should react to development proposals?
 - f. is Policy E6(D)(ii) a list of 'principles' or 'requirements'? If it is the latter, is modification required for clarity?
 - g. is the need for a masterplan extending to the full boundary justified and will it be effective? Is modification needed to provide more clarity about master planning expectations?

- h. is the term 'mixed intensification' clear?
- i. are the objectively assessed industrial needs of the Borough over the plan period known and, if not, will Policy E6(D)(ii) be effective?
- j. Is modification needed to clarify the aim of the policy in relation to the need for increasing industrial capacity?
- k. are any other modifications needed to Policy E6 for soundness?

Matter 6: Design and Amenity, Tall Buildings, and the Historic Environment

Issue [Focus – Policies DAA, D9]

Whether the Plan is justified, effective and consistent with national policy and in general conformity with the London Plan in relation to design, the historic environment, and tall buildings.

Questions

Design and amenity

1. In terms of the local variation to Policy DAA of the London Plan:
 - a. what is the background to the variation and why is it proposed?
 - b. what is the evidence justifying it?
 - c. does it clearly articulate the adverse impacts which it seeks to manage and, where necessary, secure the appropriate type and level of mitigation for any adverse effects?
 - d. is it consistent with national policy and in general conformity with the London Plan?
 - e. are any modifications needed to the variation to Policy DAA for soundness?

Tall Buildings

2. In terms of the local variation to Policy D9 of the London Plan:
 - a. what is the background to the variation and why is it proposed?
 - b. what is the evidence justifying it? Are the proposed parameters with the available evidence?
 - c. does the character led approach of the Plan to determining building heights strike an appropriate balance with the 'Good Growth' and appropriate densification principles of the London Plan?
 - d. is the differential between the definition of a 'tall building' contained in the Policy D9 of the London Plan and the measurements which are referred to in criterion E and specified in Table DMP1 justified and in general conformity with that adopted strategic plan?
 - e. do criterion E, Table DMP1 and Figure DMP1 provide sufficient clarity on what is meant by a 'tall building' in an Ealing context for each of the Town Plan areas?
 - f. is the local approach to defining the parameters for tall buildings across the Borough consistent with evidence base documents EB42, EB44, EB45, EB45A, EB45B, EB46, EB47 and EB48?

- g. are the Council's suggested modifications [S24] for the design principles of specific allocations throughout the Plan to refer to 'up to' a given number of storeys needed for the allocations to be justified by evidence, effective, and therefore sound?
- h. will criteria F, G and H be effective in securing an appropriate design response that is sympathetic to the character and urban grain of the Borough, as well as any site-specific constraints, in a manner that is in general conformity with the London Plan and consistent with national policy?
- i. are any modifications needed to the variation to Policy D9 for soundness?

Historic Environment

- 3. Does the Plan set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats?
- 4. Does the proposed scope of the Plan appropriately supplement the heritage policies of London Plan in a manner that addresses any other local heritage issues?
- 5. Are the heritage assets potentially affected by the planned growth in the Plan clearly identified? Have potential effects been assessed and reported upon in a clear and consistent way, with an effective understanding of significance? Does this include consideration of any effects on setting? Have Historic England raised any objection to the Plan and, if so, how have concerns been responded to?
- 6. Will sites of potential archaeological interest be effectively addressed by the Plan?
- 7. Are any main modifications necessary for soundness?

Matter 7: Climate Change, the Environment and Healthy Places

Issue [Focus – Policies G4, G5, G6, S5, OEP, ECP, WLC, SI7]

Whether the Plan is justified, effective and consistent with national policy and in general conformity with the London Plan in relation to climate change, the environment, and healthy places.

Questions

Climate Change

- 1. What is the background to the local approach to operational energy performance set out in Policy OEP and what is the evidence to justify it?
- 2. Is Policy OEP consistent with the parameters set out in the Written Ministerial Statement on Energy Efficiency (December 2023) (the EEWMS) in terms of:
 - a. the proposed target levels;
 - b. the robustness of the submitted evidence supporting any proposed uplift;
 - c. how the proposed targets are expressed within Policy OEP;

- d. the viability implications on future development proposals when assessed cumulatively with other development plan policy requirements, in terms of the effect on the delivery of future housing units, including affordable homes; and
 - e. providing flexibility to respond to the viability findings of individual schemes?
- 3. Are any modifications needed to Policy OEP for soundness?
- 4. In terms of Policy ECP:
 - a. what is the background to this policy;
 - b. what is the evidence justifying it?
 - c. is the EEWMS relevant to this local approach to embodied carbon reduction? If so, is Policy ECP consistent with the parameters set out in that WMS?
 - d. are the proposed targets set out in Table DMP4 clearly expressed in policy and are they justified through evidence?
 - e. are any modifications needed to Policy ECP for soundness?
- 5. In terms of Policy WLC:
 - a. what is the background to the local approach to whole life cycle carbon reduction set out in Policy WLC?
 - b. is it a local variation to Policy S12 of the London Plan and if so, is a modification needed to clarify this?
 - c. is the EEWMS relevant to the proposed local approach to whole life cycle carbon reduction, why is this, and if so, is Policy WLC consistent with that WMS?
 - d. are targets for reducing carbon clearly expressed in policy to enable the assessment of a proposal against criterion A?
 - e. is the type of development falling within its scope in general conformity with the London Plan, justified and consistent with the Framework?
 - f. is the scope of criterion (B) justified, effective, in general conformity with the London Plan and consistent with national policy?
 - g. what progress has been made in devising a carbon optioneering methodology to enable the outcomes of this policy requirement to be evaluated? will it be effective in the absence of a carbon optioneering methodology?
 - h. are any modifications needed to Policy WLC for soundness?
- 6. In terms of the local variation to Policy SI7:
 - a. what is the background to the local variation of Policy SI7 of the London Plan to reduce waste and support the circular economy?
 - b. how does criterion D vary to that adopted policy, is it broadly in conformity with the London Plan, evidenced and justified under criterion C of the adopted policy?
 - c. is the policy threshold effective and consistent with national policy, and why is this?
 - d. are any modifications needed to the local variation to Policy SI7 for soundness?

Environment and Healthy Places

7. In terms of the local variation to Policy G4 of the London Plan:
 - a. what is the background to the variation and why is it proposed?
 - b. what is the evidence justifying it?
 - c. given its focus on keeping any impact on visual openness to a minimum and simultaneously requiring that openness be preserved and enhanced, is this local variation effective and consistent with the national policy for with sites within designated Green Belt, and why is this?
 - d. are any modifications needed to the local variation to Policy G4 for soundness?
8. In terms of the local variation to Policy G5 of the London Plan:
 - a. what is the background to the variation and why is it proposed?
 - b. is it justified, effective and in general conformity with the London Plan?
 - c. in terms of the proposed approach to Use Class E (Commercial, Business and Service Business uses) are any modifications necessary in the interests of soundness?
9. In terms of the local variation to Policy G6 of the London Plan:
 - a. what is the background to it?
 - b. is the 20% biodiversity net gain requirement justified through evidence, including for proposals of different typologies and in lower land value areas?
 - c. what is effect of the policy requirement on the deliverability of housing across the Borough, and what evidence supports your stance?
 - d. are any modifications necessary so that criterion F is effective in terms of:
 - (i) securing an appropriate contribution within a given scheme; (ii) providing sufficient clarity on how the policy will be implemented in instances when there are other competing policy requirements which affect scheme viability; and (iii) providing sufficient clarity on the circumstances in which offsite provision will be acceptable?
10. In terms of the local variation to Policy S5 of the London Plan:
 - a. what is the background to it?
 - b. is it in general conformity with the London Plan and justified, including in relation to the quantitative policy requirement set out in criterion E?
 - c. is the policy variation effective in terms of how affordable community access will be determined and secured through criterion F and having the relevant development threshold contained within the supporting text?
 - d. is it consistent with national policy in terms of the management of any proposed loss of existing provision?
 - e. are any modifications needed to the local variation to Policy S5 for soundness?

Matter 8: Town Plans

Issue [Focus – all Town Plans]

Whether the Town Plans are justified, effective, in general conformity with the London Plan, consistent with national policy and positively prepared.

Town Plan Visions and Spatial Strategies

1. For each Town, are the issues to address and opportunities set out in the plan based on a sound understanding of each place and clearly articulated?
2. Will the Spatial Strategy and policies for each Town be effective in addressing the issues and capitalising on the opportunities of each place in a way that supports the delivery of sustainable development, clearly setting out deliverable planning related policy expectations and/ or proposals in a manner which gives certainty in future decision taking in the Borough?
3. Is each Town Plan Spatial Strategy aligned with Policies SP1 to SP4 and, for effectiveness, do the policies in the Plan support their delivery? Is the purpose and scope for each policy sitting within the Town Plan Spatial Strategy justified?
4. Are the key Infrastructure Delivery Schedules for each Town justified by and consistent with the evidence base, including where critical infrastructure is needed to support the delivery of individual allocations?
5. Are the boundaries of all town centres clearly defined, including any proposed alterations? Where alterations are proposed are they supported by evidence in development capacity assessments and town centre health checks and subject to assessments of retail impact? Taken as a whole, is the Plan clear about the applicable policies that will apply in different centres?
6. What is the latest position on the preparation of the Ealing Metropolitan Town Centre Growth Strategy [EB57], and does it have any implications for the Spatial Strategy or individual policies in the Plan?
7. For deliverability, are the town-based Spatial Strategies built on an appropriate understanding of where public realm/space interventions are reliant on development finance or general spending unrelated to development management activities?
8. Are each of the town-based Spatial Strategies aligned in respect of articulating and promoting the existing and proposed cycle network, other strategic routes and local and green links across the Borough?
9. Are the instances where open space is proposed to be protected clear, both in terms of the identification of such sites and the policy mechanism for protecting them?

Acton Town Plan

10. In terms of Policy A1:

- a. is the stated moderate level of growth along key north-south corridors of Acton justified?
- b. does Figure A1 clearly distinguish the OPDC area from other Opportunity Areas?
- c. are modifications required so that the rail routes in Figure A2 are accurately depicted?

- d. does clause k (iii) adequately address the health infrastructure of the Acton Town Plan area?
- e. is clause l (iv) appropriate in instances where land is required for operational or development purpose by the transport operator?
- f. are modifications required to ensure consistency between the policy, supporting text and London Plan regarding the ELP's approach to intensification of use and co-location of housing and light industrial uses in Local Significant Industrial Sites?
- g. does Table A1 identify all relevant infrastructure providers?
- h. are any modifications needed to Policy A1 for soundness?

11. In terms of Policy A2:

- a. will the policy be effective in addressing the 'At Risk' status of the Acton Town Centre Conservation Area?
- b. are any modifications needed to Policy A2 for soundness?

12. In terms of Policy A3:

- a. is the approach to co-location opportunities at South Acton LSIS in general conformity with the London Plan and is there sufficient clarity and consistency on this matter between the policy wording and the supporting text?
- b. are the parameters for tall buildings in this Town consistent with the submitted evidence base?
- c. are any modifications needed to Policy A3 for soundness?

13. In terms of Policy A4:

- a. is clause (iv) justified and effective?
- b. are any modifications needed to Policy A4 for soundness?

14. In terms of Policy A5:

- a. are any modifications needed to Policy A5 for soundness?

15. In terms of Policy A6:

- a. does it take adequate account of the respective jurisdiction and responsibilities of the Borough Council and the Old Oak and Park Royal Development Corporation and the implications of HS2 proposals?
- b. are any modifications needed to Policy A6 for soundness?

Ealing Town Plan

16. In terms of Policy E1:

- a. is the Vision and Spatial Strategy for Ealing effective in terms of its clarity and content?
- b. has the potential for cumulative effects of the Vision and Spatial Strategy been considered and if so, what was the outcome?
- c. has consideration of any sewerage and water supply constraints in the area informed the content of Table E1?
- d. is the approach to bus stopping and standing arrangements effective?

- e. are any modifications needed to Policy E1 for soundness?

17. In terms of Policy E2:

- a. is the policy approach based upon up-to-date evidence relating to the health and opportunities for this town centre?
- b. is the strategy for the Town Centre sufficiently clear?
- c. is the response to the role and character of the Town Centre and identified opportunities for social and economic regeneration, growth, transport and permeability clear, coherent and justified?
- d. will the policy approach be effective in delivering the 'office corridor' and positively contributing to the vitality and viability of the Town Centre?
- e. are any modifications needed to Policy E2 for soundness?

18. In terms of Policy E3:

- a. Is the term 'character-led growth and intensification' in an Ealing context clearly articulated?
- b. are any modifications needed to Policy E3 for soundness?

19. In terms of Policy E4:

- a. Is the term 'character-led growth' in an Ealing context clearly articulated?
- b. are any modifications needed to Policy E4 for soundness?

Greenford Town Plan

20. In terms of Policy G1:

- a. is the proposed level of growth for the area correctly cited?
- b. does Figure G2 accurately denote the land use status of Greenford Quay as a SIL?
- c. to be effective, should specific reference be made to SILs?
- d. is the intensification of employment sites a justified and effective approach for the Town?
- e. does it adequately address the varied needs of businesses in terms of unit sizes and accessibility?
- f. is the content of Figure G1 accurate?
- g. is it consistent with Policy G4 in terms of improvements to the access to the canal/GUC Cycleway?
- h. are any modifications needed to Policy G1 for soundness?

21. In terms of Policies G2 to G5:

- a. are any modifications needed for soundness?

22. In terms of Policy G6:

- a. should SILs be explicitly referenced in the interests of policy effectiveness?
- b. is the definition of 'industrial intensification' justified and is it effective in providing for an appropriate level of flexibility to cater for business needs?
- c. are any modifications needed to Policy G6 for soundness?

Hanwell Town Plan

23. In terms of Policy H1:

- a. do the policies in the Plan support the in Policy H1(A) of maximising the opportunities provided by the Elizabeth Line?
- b. in light of the Vision for Hanwell referencing its rich history and prominent local heritage assets, do policies at H1(C) to (F) make appropriate reference to heritage assets in Hanwell, including assets associated with the Canal Network?
- c. are the references to development at Trumpers Way Locally Significant Industrial Site and the area around Ealing Hospital consistent with the wider development plan, including specific allocations?
- d. are any modifications needed to Policy H1 for soundness?

24. In terms of Policy H2:

- a. Is the term 'character led intensification' sufficiently understood and how does this relate to the 'design led' approach in policy H2 of the London Plan? Do the requirements support making effective use of land?
- b. do the allocations in the Plan and wider development plan policies support the effectiveness of Policy H2 and, taken together, the overall objective of Hanwell District Centre remaining the primary location for retail, cultural and community services?
- c. are any modifications needed to Policy H2 for soundness?

Northolt Town Plan

25. In terms of Policy N1:

- a. does the evidence demonstrate that complementing Northolt's existing neighbourhood town centre with a new secondary neighbourhood centre will be effective? What are the anticipated effects, if any, on the vitality and viability of the existing neighbourhood centre and how is that evidence? Is the approach consistent with national policy in respect of ensuring the vitality of town centres?
- b. is the effectiveness of the new secondary neighbourhood centre dependant on the reconfiguration of the White Hart roundabout? What is the Council's response to TfL's regulation 19 response relating to the deliverability of the roundabout reconfiguration and what impact, if any, does this have for the justification and effectiveness of a new secondary neighbourhood centre?
- c. do the policies in the Plan support the aspiration in the Spatial Strategy for significant investment in active travel interventions and improved public transport? Will the measures be successful in reinforcing north-south connectivity?
- d. are the references to development at the locations specified in Policy N1(G) consistent with the wider development plan, including specific allocations? Are all the housing estates referred to the subject of specific allocation in the Plan and, if not, why are they referred to? Is the Plan clear about the very limited circumstances where reconfiguration of green

space may be supported and is this reflected in the associated site allocations?

- e. are any modifications needed to Policy N1 for soundness?

26. In terms of Policy N2:

- a. how the proposal for a new spatial masterplan to be taken forward and is the masterplan, and delivery of the measures in Policy N2(i), dependant on any of the allocations in the Plan?
- b. are any modifications needed to Policy N2 for soundness?

27. In terms of Policy N3:

- a. how does the development of proposed allocations at Medlar Farm Estate (05NO) and Yeading Lane I (06NO) and the references to the White Hart Roundabout Strategic Masterplan Area and a related masterplan relate to policy N3? What is the planning status of the Masterplan Area? Taking the policy, the allocations, and the wider development plan together will they be effective in supporting sustainable development of the roundabout area?
- b. in light of comments from TFL, is the reconfiguration of the White Hart Roundabout deliverable? If not, what are the implications for the effectiveness of the policy (and its associated policies in the development plan)?
- c. are any modifications needed to Policy N3 for soundness?

28. In terms of Policy N4:

- a. is the boundary of the Northolt Industrial Estate clearly defined, including designations, and appropriate in terms of scope?
- b. does the evidence support the assertion that industrial intensification of the estate will unlock significant new industrial floor space? How will the policies in the wider development plan assist with delivery?
- c. in light of comments from TFL, is the reconfiguration of the White Hart Roundabout deliverable? If not, what are the implications for the effectiveness of the policy (and its associated policies in the development plan)?
- d. are any modifications needed to Policy N4 for soundness?

Perivale Town Plan

29. In terms of Policy P1:

- a. how will the policies in the Plan support the diversification of Perivale's local shopping parades?
- b. is the provision of the canal crossings set out in the policy deliverable?
- c. is the position that Perivale will see relatively limited levels of residential led development consistent with national policy and in general conformity with the London Plan?
- d. are any modifications needed to Policy P1 for soundness?

30. In terms of Policy P2:

- a. is the boundary of the Perivale Neighbourhood Centre clearly defined and appropriate in terms of scope?
- b. are any modifications needed to Policy P2 for soundness?

31. In terms of Policy P3:

- a. are any modifications needed to Policy P3 for soundness?

32. In terms of Policy P4:

- a. how will the policies in the Plan, and related development management activity, be effective in supporting a new neighbourhood centre?
- b. are any modifications needed to Policy P4 for soundness?

33. In terms of Policy P5:

- a. is the boundary of the Perivale Industrial Estate clearly defined, including designations, and appropriate in terms of scope?
- b. is the aim of diversifying and enhancing the employment and business offer on the estate clear?
- c. are any modifications needed to Policy P5 for soundness?

Southall Town Plan

34. In terms of Policy S1:

- a. how will the policies in the Plan contribute to future development celebrating and strengthening the character and heritage of Southall as a cultural destination?
- b. paying regard to Policy S1(G) will the policies in the Plan be effective in terms of fighting inequality? How will development activity improve access to primary healthcare infrastructure and enhance existing social and community infrastructure?
- c. is the redesignation of Charles House and the Balfour Business Centre as LSIS justified? Are boundary changes clear?
- d. how will the policies in the Plan promote innovative design solutions to facilities inter-generational living and will they be effective?
- e. how will the policies in the Plan make an effective contribution to fully realising the growth and regeneration potential of the Southall Opportunity Area?
- f. is the boundary of the Opportunity Area clear? Is it altered as a result of the Plan? If so, why and is the change clear and justified?
- g. taking each in turn, how have the requirements of Policy SD1(B) been considered and reflected in the Plan?
- h. paying regard to Policy H1(B)(c) of the London Plan, how does the development plan enable the delivery of housing capacity identified in the Opportunity Area?
- i. how has planned infrastructure investment been considered and does the Plan take the opportunity to capitalise on the potential regeneration benefits, including any necessary phasing?
- j. will the Plan be an effective replacement for the Southall Opportunity Area Planning Framework?

- k. taken as a whole, is the Plan in general conformity with the London Plan in relation to the Southall Opportunity Area?
- l. are any modifications needed to Policy S1 for soundness?

35. In terms of Policy S2:

- a. is the policy in general conformity with the London Plan in respect of Major Town Centres? Paying regard to Policy E9 (c) of the London Plan, how does the Plan support the bringing forward of capacity for additional comparison goods retailing?
- b. is the intended effect on and relationship with the Green Quarter development clear?
- c. are any modifications needed to Policy S2 for soundness?

36. In terms of Policy S3:

- a. is the expansion of the King Street Neighbourhood Centre supported by evidence?
- b. how will the policies in the Plan assist with securing the long-term survival of the heritage assets set out in Policy E3(v) and will they be effective?
- c. are any modifications needed to Policy S3 for soundness?

37. In terms of Policy S4:

- a. is the reference to extending Southall Major Centre in general conformity with the London Plan, specifically Policy SD8(C)?
- b. are any modifications needed to Policy S4 for soundness?

38. In terms of Policy S5:

- a. are any modifications needed to Policy S5 for soundness?

Matter 9: Development Sites

Issue

Whether the development sites proposed for allocation in the Plan are justified, effective, in general conformity with the London Plan, consistent with national policy and positively prepared.

Town Plan Development Site Allocations – general

1. For effectiveness, is it sufficiently clear that the Plan seeks to formally allocate the Development Sites as land for development?
2. Are the overarching principles for the Development Sites (set out at the start of each section, e.g. Action is at para 4.1.61) justified and deliverable, including the expectation that key infrastructure is expected to be delivered in early phases of development?
3. For effectiveness, is it clear how a decision maker should respond to the contextual considerations and design principles for each Development Site and the overarching principles? Is modification needed to clarify policy from guidance?

4. For soundness, is it necessary for individual site allocations within the Plan to set out the anticipated yields for numbers of housing units and/or commercial floorspace to be delivered?
5. Is the methodology for determining building heights robust and are the building height limits for each site allocation consistent with it?
6. Is the methodology for assessing heritage impacts of site allocations robust and is each site allocation consistent with it?
7. Given the identified deficiencies in access to open space in the evidence base, how do the policies in the Plan assist with addressing this issue and will they be effective?
8. Given the number of allocations affected, how has flood risk been taken into account, both in terms of assessing the capacity of site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?
9. How have air quality issues been considered, evidenced and reflected in the choice of site allocations and any necessary mitigation?

Site specific questions

10. For each proposed development site, please set out:

- a. the background and how it was identified;
- b. the uses to be permitted and how they are justified;
- c. how the boundaries and extent of the site have been defined and justified;
- d. for housing allocations, the anticipated capacity of the site and whether this is justified;
- e. for commercial development, the estimated floorspace and whether this is justified;
- f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;
- g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;
- h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;
- i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;
- j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;
- k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;
- l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;
- m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;
- n. how measures designed to promote sustainable travel will be effective;

- o. clear evidence of whether the site is viable and developable at the scale of development expected; and
- p. any modifications that are necessary for reasons of soundness.

Acton Development Sites

02AC - Acton Gardens

- 11. Is modification to the site boundary (highlighted in the Council's response to Initial Questions dated 10 January 2025 [EX3]) necessary for soundness?

06AC - Acton Vale Industrial Park & Westgate House

- 12. What provision, if any is made in respect to existing occupiers of the site?
- 13. Are the design principles appropriate in terms of scale and retention of the building?
- 14. Is the allocation justified in respect of potential effects on the capacity of the local highway network and local car parking provision?

07AC - Dean Court

- 15. Are any trees on or near the site the site subject to a tree preservation order?
- 16. How will issues relating to air quality be addressed and will mitigation be effective?
- 17. How have the effects on local biodiversity been assessed and, where necessary, addressed?

Ealing Development Sites

01EA - Broadway Connection & Arcadia Shopping Centre

- 18. Is the proposed scope of uses justified, effective and consistent with national policy?
- 19. Is the increased extent of the site allocation since the Regulation 18 stage justified?
- 20. How will the site allocation affect the town centre and is this evidenced and justified?
- 21. Does the supplementary planning document (2012) for the site remain relevant, and if so, are the allocation's Design Principles consistent with it?
- 22. Is the maximum storey height specified in the Plan, correct?
- 23. Do the Design Principles appropriately address movement around and through the site?

02EA - Ealing Broadway Shopping Centre & Crystal House

- 24. Is the proposed scope of uses justified, effective and consistent with national policy?
- 25. Is the PTAL for the site correctly stated in the Plan and do the Design Principles reflect the rating?

06EA - 49-69 Uxbridge Road

- 26. Is the proposed scope of uses justified, effective and consistent with national policy?
- 27. Does the site assessment adequately consider the relationship with the Questors Theatre?

07EA - CP House

28. Is the proposed scope of uses justified, effective and consistent with national policy?
29. Is the maximum storey height specified in the Plan, correct?

08EA - Craven House

30. Is the proposed scope of uses justified, effective and consistent with national policy?
31. Does the scale of development optimise previously developed land in line with the London Plan?

13EA - 99-115 Broadway, West Ealing

32. Is the address for this allocation correctly cited in Table 2, page 170 of the Plan?

15EA - Waitrose, West Ealing

33. Is the allocation justified in respect of potential effects on the capacity of the local highway network and stipulated level of car parking provision?
34. In terms of effectiveness, should Jacob's Ladder footbridge be included within the allocation site?
35. Does the scale of development optimise the reuse of previously developed land in line with the London Plan?

16EA - West Ealing Station Approach

36. Is the allocation effective in respect of parking, servicing and delivery arrangements?

19EA - Gurnell Leisure Centre

37. Is the loss of Metropolitan Open land justified?
38. Is the allocation effective in respect of servicing and coach drop off arrangements?

20EA - Downhurst Residential Care Home

39. Is modification to the site boundary (highlighted in the Council's response to Initial Questions dated 10 January 2025 [EX3]) necessary for soundness?

21EA - Former Barclays Sports Ground

40. Is the loss of Metropolitan Open land justified?
41. Should the Plan treat this site allocation as 'enabling development in terms of Policy EA21 and the proposed use of the site?
42. Will the site allocation be effective in securing appropriate community sports provision?

22EA - 96 Queens Drive & Telephone Service Centre

43. In terms of effectiveness, is the scope of proposed uses clear and deliverable and is it justified and consistent with Policy E4?

23EA - Old Actonians Sports Ground

44. Will the allocation result in the loss of playing fields and if so, is this justified and consistent with national policy?
45. Will the allocation be effective in enhancing future outdoor leisure offer?

24EA - Wickes, South Ealing Road

46. Has the impact of the allocation on the Neighbourhood Centre been assessed?
What evidence exists to determine whether the Design Requirements for this allocation should make adequate provision for the requirements of the existing business within the site?

Greenford Development Sites

01GR - Greenford Hall, Methodist Church former Police Station, former Clinic & Greenford Library

47. Is the allocation justified in respect of potential effects on the capacity of the local highway network and local car parking provision?
48. Will the approach to parking be effective and in general conformity with the London Plan?

02GR - Greenford Broadway Car Park

49. Will the approach to parking be effective and in general conformity with the London Plan?
50. Is modification to the site boundary (highlighted in the Council's response to Initial Questions dated 10 January 2025 [EX3]) necessary for soundness?

04GR - Westway Cross

51. How have the effects on local biodiversity been assessed and, where necessary, addressed?
52. Is the allocation justified in respect of potential effects on the capacity of the local highway network and local car parking provision?

05GR - Former Greenwich School of Management

53. Is the proposed employment led scheme and range of permitted uses justified?

06GR - Smiths Farm

54. Is modification to the site boundary (highlighted in the Council's response to Initial Questions dated 10 January 2025 [EX3]) necessary for soundness?
55. Is the site allocation justified and consistent with the national approach to Green Belt?

Hanwell Development Sites

01HA - Land to the front of Ealing Hospital

56. Is the allocation justified, and will it be effective in respect of its understanding and management of potential effects on Ealing Hospital (including during development)?

03HA - George Street Car Park

57. Is the allocation justified in respect of potential effects on local car parking provision?
58. Is the allocation justified, and will it be effective in respect of potential effects on heritage assets, including the Clock Tower Conservation Area?

04HA - Site of Lidl and discount store

59. Will a requirement to re-provide the supermarket on site be effective?

05HA - Marshall Site, Gold's Gym & Garages on Montague Avenue

60. Is the allocation justified, and will it be effective in respect of potential effects on heritage assets, including the Clock Tower Conservation Area?

61. Is the allocation justified and consistent with national policy in respect of sports/leisure provision?

07HA - Copley Close Estate

62. Is a requirement for car parking for units of three bedrooms or more justified and will it be effective in the absence of specifying an applicable parking standard?

Northolt Development Sites

01NO - Car Sales Site and Northolt Leisure Centre

63. How have biodiversity/green corridor issues been taken into account? Will the design principle of re-provision on site or on adjacent site be effective?

64. Are any trees on or near the site the site subject to a tree preservation order?

65. In light of Historic England's comments, have potential effects on heritage assets been considered and appropriately addressed?

66. Are the anticipated arrangements in respect of leisure centre parking justified and will they be effective in assisting with the delivery of sustainable development?

02NO - Mandeville Parkway

67. How has the issue of any loss of open space and effects on the wider area been considered? Will the design principle to limit development primarily to part of the site be effective?

68. Is the site boundary appropriate in terms of showing the area proposed for development?

03NO - Northolt Sorting Office

69. For consistency with the stated proposed use, and therefore effectiveness, is modification needed to clarify the design principles relating to industrial uses?

04NO - Northolt Driving Range

70. Is development justified, consistent with national policy, and in general conformity with the London Plan in relation to Green Belt?

71. Is the contribution the site would make to industrial needs justified by evidence?

72. Are modifications to the site boundary and other policy details needed to reflect land in the ownership of the Canals and Rivers Trust?

73. For consistency with national policy, is modification to the proposed use needed to refer to re-provision of a leisure/sport use on the site? Is such a use deliverable?

05NO - Medlar Farm Estate, 06NO - Yeading Lane I, 07NO - Yeading Lane II, 08NO - Grange Court

74. What are the implications of 05NO being included in the White Hart Roundabout Strategic Masterplan Area? What is the latest on the masterplan? How is it anticipated that the masterplan and the development of 05NO and 06NO Yeading Lane I should be taken into account?

75. For all sites, how have biodiversity/green corridor issues been taken into account?
76. For all sites, do the design principles that ask for refurbishment and infilling to be considered as a first option, but also refer to complete demolition and redevelopment give a clear direction about the development that may be permissible on the site? Is a 'refurbishment first' requirement in accordance with national policy and in general conformity with the London Plan in respect of making the best use of land?
77. For 05NO, how and where is it expected that the children's centre on the site will be provided and, if it's on site, is modification needed to clarify?
78. For 06NO, how have effects on the Green Belt been considered and is the Council's suggested modification adjusting the site boundary to exclude Green Belt land necessary for soundness?
79. For 07NO, is modification to the site boundary (highlighted in the Council's response to Initial Questions dated 10 January 2025 [EX3]) necessary for soundness?
80. For 08NO, how has loss of open space been considered?

09NO - Kingdom Workshop, Sharvel Road

81. How does the evidence demonstrate that the site will be appropriate and deliverable within a timeframe consistent with the identified needs?
82. Is development consistent with national policy in relation to Green Belt land?
83. How have potential effects on Down Barns Farm been considered?

10NO - Airways Estate

84. Is modification to the site boundary (highlighted in the Council's response to Initial Questions dated 10 January 2025 [EX3]) necessary for soundness?
85. Is modification necessary for soundness to refer to the site's proximity to the Grand Union Canal as a contextual consideration?

Perivale Development Sites

For all Perivale development sites

86. How have issues relating to air quality been considered and will mitigation be effective?

02PE - Land on the South Side of Western Avenue

87. Is development justified, consistent with national policy, and in general conformity with the London Plan in relation to effects on Metropolitan Open Land and open space?

Southall Development Sites

01SO - Southall Crossrail Station & Gurdwara

88. To be justified, is modification needed to clarify the requirements in relation to parking?

02SO - Southall Sidings

89. Is allocation of the site justified in respect of its potential effects on biodiversity?
90. Is allocation of the site justified in respect of its potential effects on protected trees? Do the capacity expectations of the site to accommodate development reflect any relevant constraints?
91. Is modification needed to the requirements in relation to parking needed for general conformity with the London Plan?

03SO - Former Sorting Office & Kings Hall Methodist Church

92. Is modification needed to the requirements in relation to parking needed for general conformity with the London Plan?
93. How have effects on the locally listed building been considered?

04SO - Southall West London College

94. Is modification needed to the requirements in relation to parking needed for general conformity with the London Plan?
95. Is modification needed to include leisure/sport uses amongst the proposed uses in order to be consistent with national policy and, if so, would the modification be deliverable?

05SO - 31-45 South Road & Telephone Exchange Quality Foods & Iceland

96. Is modification needed to the requirements in relation to parking needed for general conformity with the London Plan?

06SO - Fairlawn Hall and Science of the Soul

97. Is modification needed to the requirements in relation to parking needed for general conformity with the London Plan?

07SO - The Limes, Maypole Court, Banqueting Centre, 13-19 The Green

98. Will the approach to parking be effective and in general conformity with the London Plan?

08SO - Middlesex Business Centre

99. Is the boundary of the site justified, including in terms of helping to achieve sustainable development and the availability of relevant land?

09SO - Havelock Estate

100. For effectiveness, is modification needed to set out more detail relating to highway layouts and bus infrastructure?

10SO - The Green

101. Will the allocation be effective and in general conformity with the London Plan in terms of the growth and regeneration potential of the Southall Opportunity Area?
102. Is the allocation justified and general conformity with the London Plan in respect of car parking requirements?

11SO - The Green Quarter (Southall Gasworks)

103. Will the allocation support sustainable development of the Green Quarter and its surroundings?

104. Will the approach of supporting development of the site through an agreed masterplan be effective, including the specification within the policy of what a masterplan should contain and linkages with the wider development of the area?

105. Is the allocation justified and general conformity with the London Plan in respect of car parking requirements?

13SO - Endsleigh Industrial Estate & 14SO Witley Works

106. Are the allocations justified in relation to their treatment of Adelaide Dock Yard?

107. Will the design principle relating to co-ordination of layout and serving between 13SO and 14SO be effective?

15SO - Monorep Site

108. Is the allocation justified in terms of its consideration of heritage assets and potential effects on canal infrastructure?

16SO Warren Farm and Imperial College Land

109. Is the allocation consistent with national policy and in general conformity with the London Plan in relation to Metropolitan Open Land?

110. How has the issue of biodiversity been considered and is the approach justified?

17SO - Great Western Triangle Centre

111. Is the allocation in general conformity with the London Plan when regard is paid to policy on Strategic Industrial Land?

18SO - Golf Links Estate

112. For clarity, and therefore effectiveness, is modification needed to remove the reference to Birkdale Court outdoor sports facility and open space?

19SO - Cranleigh Gardens Industrial Estate & Kingsbridge Crescent

113. For effectiveness, modification needed to set out the design principles for the part of the site that addresses the canal?

20SO - Hambrough Tavern

114. For effectiveness, is modification needed to clarify the expectations in terms of servicing the site?

21SO - Toplocks Estate

115. How has the issue of biodiversity been considered and is the approach justified?

Matter 10: Delivery and Monitoring

(Note - Answers to questions in this Matter, particularly around infrastructure provision, will also be informed by detailed discussions about deliverability of specific allocations and the Spatial Strategy under other Matters).

Issue

Whether the Plan is effective in terms of delivery of its proposals and arrangements for monitoring.

Questions

1. Does the Plan set out the contributions expected from development and is it in accordance with paragraph 34 of the NPPF?
2. What is the latest position on the examination of the draft Ealing LPA Charging Schedule [EB41] and does it have any implications for the soundness of the Plan?
3. Does Policy FLP provide a sound approach to funding? Is the approach of leaving detail to a future SPD sound?
4. In terms of Policy ENA:
 - a. What is the background the policy and what does it seek to achieve?
 - b. How is it justified by the evidence, including the scoring against the objectives in the IIA process?
 - c. For effectiveness, is it clear about when the policy would apply? Does it provide certainty about how a decision maker should react to a proposal?
5. How has viability been considered? Is there a proportionate assessment of the viability of the Plan? Is it sufficiently flexible to respond to relevant changes which may occur during the plan period?
6. In terms of how the Plan will be monitored:
 - a. does the monitoring framework appropriately dovetail with and/ or rely upon relevant monitoring arrangements for other parts of the development plan for the Borough;
 - b. do the proposed indicators provide adequate coverage across each of the policies of the Plan?
 - c. is each indicator relevant and measurable?
 - d. are any modifications needed to the monitoring framework for soundness?