

Ealing LPA Local Plan (Regulation 24) 2025

Matter 1: Procedural and Legal Requirements

Issue:

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

Written Statement on Behalf of Ealing Council

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Questions:

Plan Preparation and Scope:

1. Has the Plan been prepared in accordance with the Local Development Scheme?

LPA Response: Yes, Ealing LPA's New Local Plan has been broadly prepared in accordance with the Local Development Scheme (LDS). It outlines the timetable and procedures for preparing development plan documents by Ealing LPA and was most recently updated in July 2023 {EB68}.

The LDS briefly sets out the role, content and status of the Local Plan. It confirms that it will be consistent with and align with national planning policies and be in general conformity with the Mayor of London's Spatial Development Strategy for Greater London (the 'London Plan'). It also confirms that the geographical coverage of the Local Plan will be borough wide, except for the area covered by the Old Oak and Park Royal Mayoral Development Corporation which has separate plan making powers.

The LDS also outlines a timetable for preparing and adopting the Local Plan, including key milestones. Public and Stakeholder Consultation on Final Proposals (Regulation 19) was due to commence in January 2024 but this was delayed until 28th February 2024. This was to enable Ealing's Full Council to consider the Local Plan at a special meeting held on 21st February 2024 (with the agenda papers including the Local Plan Reg 19 draft published on 13th February 2024). Submission to the Secretary of State was expected to happen in May 2024 but this was also delayed until November 2024 to enable full and proper consideration of the extensive public and stakeholder feedback received at Regulation 19.

Finally, a revised version of the LDS {it is proposed that it be inserted at EB68A} has been drafted to update the timetable and is in the process of being signed off, in accordance with the council's scheme of delegation.

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?

LPA Response: Yes, Ealing LPA's Local Plan was prepared in accordance with the council's Statement of Community Involvement (SCI) {EB67} last published on 15th March 2022. This involved several consultation processes, including:

- 'Shaping Ealing', a survey and 'conversation' to gain an understanding of the views of residents, businesses and other stakeholders on priorities for the borough to help shape the new Local Plan (10th November 2021 – 9th May 2022). The online survey was made available in the nine most commonly spoken languages within the borough. Workshops and community events were held in the seven Ealing towns during this period. The engagement resulted in 10,661 individual responses, which was above and beyond expectations.
- An early 'Call for Sites' was held between 3 February 2022 and 18 March 2022.
- Regulation 18 'Initial Proposals' consultation – 30 November 2022 – 8 February 2023 (10 weeks).
- A 'Call for Sites' was held at the same time as the Regulation 18 consultation.
- A cycle of meetings of the Local Development Plans Advisory Committee comprising elected members but with invited external speakers including evidence base providers and

community representatives with plenty of opportunity to ask questions and raise matters of interest.

- A focused Regulation 18 consultation on Additional Site Allocations for Gypsy and Traveller Pitch Provision ran from 5 July 2023 – 16 August 2023 (7 weeks).
- Regulation 19 ‘Final Proposals’ consultation was held between 28 February 2024 and 10 April 2024 (7 weeks).
- Workshops, webinars, library drop-in sessions and walks around each town were organised for local residents, businesses and other interested stakeholders to discuss specific topics and local town issues for both Regulation 18 and 19 consultations.
- Officers also attended a number of 1-1 meetings for interested community organisations and stakeholders as invited speakers/guests.
- The draft Local Plan was submitted to the Secretary of State (Regulation 22) on 18 November 2024. All publication and submission documents [S1] to [24] were published on the council’s dedicated New Local Plan webpage, with additional documents being added as and when necessary.

The statutory consultations invited all interested parties listed within the council’s planning consultation database, including local community interest and stakeholder groups to submit representations. All the statutory consultees and General Consultation Bodies identified in the SCI (Section 3) were also consulted.

Details of the consultation process, including relevant documents and how to make comments, were made available on the council’s website, at Ealing Council’s offices at Perceval House and council libraries throughout the borough. A Public Notice for each statutory consultation was published in local newspapers, Ealing’s online magazine, at Ealing’s Town Hall and at all borough libraries.

To enable residents and stakeholders to make comments, the council produced online surveys, downloadable and paper forms and had a dedicated email address for representations. It also held workshops, drop ins and webinars, where residents and stakeholders could discuss matters with the council. The council raised awareness of these consultations through a number of mediums. This included posters, leaflets, E-mail, social media, press releases and others, as is in accordance with the SCI.

Details of the consultation process and how to make representations were explained in the Consultation Overview of both the Regulation 18 and Regulation 19 Local Plan consultation documents. The Regulation 22 Consultation Statement (November 2024) [S20] contains a more detailed description of the consultation process including how the consultations were advertised, events held, the different methods for submitting representations, a list of stakeholders who responded to the Regulation 19 consultation and a summary of the main issues raised and officer responses.

All the above demonstrates how the council has met the minimum consultation requirements and how the Local Plan preparation has been undertaken in line with the council’s SCI.

3. Is the scope of the Plan and how it relates to other adopted and ‘made’ plans clear (including neighbourhood plans)?

LPA Response: Yes, the scope of Ealing’s New Local Plan and its relationship to other adopted and ‘made’ plans, including neighbourhood plans, is clearly defined.

Part One of the Local Plan {S1} provides background information about the process of preparing a local plan. It positions Ealing LPA's Local Plan within the wider national, regional, sub-regional and local planning frameworks. A diagrammatic illustration of the planning framework is also provided {S1, Figure 1}. In particular, it confirms that:

- the preparation of a Local Plan is set within a wider planning framework that includes the National Planning Policy Framework (NPPF) {EB10} at the national scale and the London Plan at a regional scale {S1, Para 1.5};
- it must be consistent with the NPPF which sets out the government's planning policies for England and how they are to be applied {S1, Para 1.7};
- the London Plan {EB13} is an integral part of the statutory development plan for the Local Planning Authority in Ealing and that Ealing's Local Plan must be in "general conformity" with it {S1, Para 1.10};
- the council has been working closely with its West London neighbours through the West London Alliance (WLA) to identify strategic priorities for the sub-region – with a focus on infrastructure – and to develop a shared and common evidence base and produced a separate Joint West London Waste Plan DPD {EB5} in 2015 {S1, Para 1.12};
- the council is also an active member of the Heathrow Strategic Planning Group (HSPG) to enable a co-ordinated approach to planning matters, to constructively engage with Heathrow Airport Ltd (HAL) and helped produce a non-statutory Joint Spatial Planning Framework (JSPF) {EB19} for the future development of the sub-region in 2020 {S1, Para 1.13};
- neighbourhood plans are also an integral part of the statutory local development plan and that two neighbourhood plans have been developed within the borough, Central Ealing (adopted 19 December 2017) {EB7} and West Ealing (adopted 12 June 2018) {EB8} {S1, Para 1.20}; and,
- a portion of the borough falls under the jurisdiction of the Old Oak and Park Royal Development Corporation (OPDC), including North Acton and Park Royal, which is a separate local planning authority which has its own Local Plan {EB15} which was adopted in 2022 {S1, Para 1.19}.

In summary, Ealing LPA's New Local Plan clearly delineates its scope and establishes its relationship with other adopted and 'made' plans, ensuring a cohesive and comprehensive planning strategy for the borough.

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?

LPA Response: Yes, the position regarding the applicability of policies in Ealing LPA's Local Plan to land within the jurisdiction of the Old Oak and Park Royal Development Corporation (OPDC), and its relationship with the OPDC Local Plan [EB15], is clearly defined and understood.

The OPDC serves as the local planning authority for the Old Oak and Park Royal area, which includes parts of North Acton, East Acton, and Hanger Hill wards within the London Borough of Ealing. Consequently, Ealing's Local Plan does not apply to land within the OPDC boundary. This delineation ensures that planning policies are appropriately managed by the respective authorities.

The OPDC Local Plan, adopted in June 2022, governs development within its jurisdiction. While Ealing Council remains the custodian of communities, residents, and businesses within the OPDC area, the OPDC is responsible for planning and regeneration activities. This separation of responsibilities allows for coordinated yet distinct planning approaches in the respective areas.

Paragraph 1.19 of the New Local Plan sets out the relationship between Ealing and the OPDC and their areas of responsibility {s1}. However, to ensure absolute clarity as to OPDC's role and boundary a number of minor suggested modifications have been proposed which mostly relate to cartographic changes {S24}. The key agreed suggested modifications are also set out in a Statement of Common Ground between the OPDC and Ealing Council, dated 6th May 2025 {S22h}.

In summary, Ealing LPA's New Local Plan explicitly excludes areas under the OPDC's jurisdiction, with the OPDC Local Plan [EB15] serving as the authoritative planning document for those areas. This clear delineation ensures that planning policies are effectively applied within their respective jurisdictions.

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?

LPA Response: Yes, Ealing LPA's New Local Plan adopts a logical structure with clearly identified policies. The Plan is structured to include a vision, strategic objectives, and planning policies that collectively provide a framework for sustainable development in the borough. The structure is clearly set out under 'Document Structure' {S1, Paras 0.50-0.60}. This structure also supports the implementation of the London Plan (adopted in March 2021) {EB13} and, in particular, its aspiration for achieving Good Growth.

The London Plan (2021) contains many detailed strategic policies that are also intended for development management purposes. The Mayor of London considered that this would be helpful so that councils can concentrate on locally specific issues which differentiate their areas from others.

London Plan policies already form part of the statutory development plan for the Ealing LPA so that policies within Ealing LPA's Local Plan must be read in conjunction with the London Plan (2021). Where appropriate and to avoid repetition, Local Plan policies have been drafted in such a way that they follow on directly from policies set out within the London Plan and do not duplicate. It is also the same approach that was successfully implemented with regards to Ealing's current adopted Development Management DPD {EB3}.

Therefore, policies in Chapter 5 of Ealing LPA's Local Plan which deal with development management policies are organised by policy topic areas that respond specifically to and complement Chapters 3 to 10 in the London Plan (2021) that include Design, Housing, Social Infrastructure, Sustainable Infrastructure, Economy, Heritage and Culture, Green Infrastructure and Natural Environment and Transport.

Ealing's development management policies take two forms: either local variations to the London Plan (2021), which append new text to those London Plan policies and should be read alongside them or new policies which can be read independently but which also sit within Ealing's broader development plan which includes the London Plan (2021). This is set out clearly in the Wayfinding section {S1, Para 0.61 and the accompanying diagram}.

For the avoidance of doubt, there is no intention to delete or to substitute any policies in the London Plan (2021) which are an integral part of the statutory development plan for Ealing LPA.

Where a policy name includes both letters and numbers it is a local variation to a London Plan (2021) policy (for example, Policy D9: Tall Buildings) and where it uses letters alone this is a new standalone Ealing Local Plan policy (for example, Policy DAA: Design and Amenity).

However, at Regulation 19 concerns were identified regarding duplicate policy references which could affect the clarity and effectiveness of the Plan. This was clearly an error brought about by a desire to differentiate the policy numbering system in the plan between the Regulation 18 and 19 iterations of the plan to allow for easier cross referencing and to assist colleagues in Ealing Council's Planning Services Team when quoting emerging Local Plan policies in their delegated and committee reports. In so doing the policies with an E prefix have been duplicated giving rise to a lack of clarity, in particular, policies relating to the Ealing Town Plan in Chapter 4 (specifically Policies E1-E4) and policies relating to Development Management in Chapter 5 (specifically Policies E3, E4 and E6 which all derive from the London Plan).

Therefore, a modification is needed to address instances where duplicate policy references are used. The council have highlighted the need for a suggested minor modifications {S24, ref no SMM147} but it did not propose a specific nomenclature. It is therefore suggested that for the town policies in Chapter 4, each policy is given a new prefix that distinguish any policy references from those in Chapter 5 (or the London Plan) and will also make it easier to instantly recognise which town the policy corresponds to. For example, instead of A1 it is proposed this be ACT1 and so on. Some examples are given below:

Current	Proposed
Policy A1: Acton Spatial Strategy	Policy ACT1: Acton Spatial Strategy
Policy E1: Ealing Spatial Strategy	Policy EAL1: Ealing Spatial Strategy
Policy G1: Greenford Spatial Strategy	Policy GRE1: Greenford Spatial Strategy
Policy H1: Hanwell Spatial Strategy	Policy HAN1: Hanwell Spatial Strategy
Policy N1: Northolt Spatial Strategy	Policy NOR1: Northolt Spatial Strategy
Policy P1: Perivale Spatial Strategy	Policy PER1: Perivale Spatial Strategy
Policy S1: Southall Spatial Strategy	Policy SOU1: Southall Spatial Strategy

6. What is the plan period and is it justified?

LPA Response: Ealing LPA's New Local Plan covers a 15-year period from 2024 to 2039 {S1, Paras 0.15, 1.22 and 3.1}. This timeframe aligns with national planning policy guidance, which typically recommends a 15-year horizon for local plans to ensure they provide a clear and long-term framework for development.

The plan period is considered justified based on proportionate evidence and strategic considerations. Ealing Council has conducted extensive assessments, including an Integrated Impact Assessment (IIA), to evaluate the plan's sustainability, health, and equality impacts over the proposed period. Additionally, the plan includes a housing trajectory that demonstrates how housing delivery targets will be met throughout the plan period, ensuring that development is both achievable and sustainable.

Furthermore, the plan's alignment with the London Plan (2021) ensures consistency with regional growth strategies, reinforcing its justification and effectiveness over the designated period.

In summary, the 2024–2039 plan period for Ealing's New Local Plan is justified through comprehensive evidence, strategic alignment with regional policies, and thorough assessments ensuring its deliverability and sustainability over the 15-year period.

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?

LPA Response: The IIA process has formed an integral part of the development of the Local Plan. The IIA process and team has sought to positively influence the Local Plan, regularly testing and challenging the plan from the initial stages of developing the vision and spatial options, through to testing policies and allocations. This is documented in the IIA Regulation 19 Report (S16).

The strategic policies of the Local Plan are underpinned by a growth strategy which has been developed following the consideration of reasonable alternative spatial options (see Preferred Options Report - EB106).

Three alternative spatial options for growth were identified as follows:

- Option 1: Strategic Corridor Focus
- Option 2: Network Connectivity Focus
- Option 3: Neighbourhood Centre Focus

The IIA assessment has considered the potential environmental, social and economic effects of each Spatial Option and made recommendations. These recommendations and findings of the IIA process have directly led to the development of a preferred option (option 4), which essentially combines elements of all three of the original spatial options.

This preferred option was then assessed and was considered to perform positively against all of the IIA framework objectives.

Beyond the consideration of the spatial options, the draft Local Plan policies were also assessed to determine whether or not they meet the objectives of the IIA framework. This assessment covered the Strategic Policies, Town policies and Development Management

Policies. The sites were also similarly assessed to determine whether or not they have the potential to support the objectives of the IIA.

Where the assessment identified a policy conflict, measures were identified which have been considered and where appropriate implemented to avoid or reduce this effect. In some cases, even where adverse effects had not been identified, recommendations have been made to enhance the policy (see S16).

8. Is the methodology for the IIA appropriate?

LPA Response: Yes. The IIA brings together multiple assessments, each with their own legal requirements and / or guidance to adhere to and apply. The Sustainability Appraisal/Strategic Environment Assessment (SA/SEA) and Health Impact Assessment (HIA) are fully integrated, but due to differences in the methodological approaches, the Equality Impact Assessment (EqIA) and Habitats Regulation Assessment (HRA) have followed a more discrete approach to the assessment. The methodology employed for each has had regard to key legislation, guidance and best practice. Moreover, the methodology has been refined having regard to stakeholder inputs and plan specific issues. The approach taken is both appropriate and proportionate. The basis for each sub-component assessment is summarised below:

SA / SEA approach:

The methodology employed was devised having regard to key legislation, namely:

- The Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out an SA of the local plan during its preparation.
- The Environmental Assessment of Plans and Programmes Regulations 2004 (referred to as ‘the SEA Regulations’) requires an assessment of the likely significant environmental effects arising from a plan or programme.

And key guidance:

- The Royal Town Planning Institute (RTPI) guidance on Strategic Environmental Assessment Improving the effectiveness and efficiency of SEA/SA for land use plans;
- Department for Levelling Up, Housing and Communities (DLUHC) Guidance on Strategic environmental assessment and sustainability appraisal; and
- Ministry of Housing, Communities & Local Government (MHCLG) Strategic Environmental Assessment Directive: guidance.

HIA approach:

As there is currently no statutory guidance on how to undertake a HIA, the methodology devised has been informed by a range of factors including non-statutory guidance and best practice, stakeholder interests, and project or plan-specific issues, including:

- Public Health England (PHE) Health Impact Assessment in Spatial Planning report;
- The London Healthy Urban Development Unit (HUDU) Rapid Health Impact Assessment Tool; and
- The Dahlgren and Whitehead model (Figure 2), which illustrates the determinants of health ranging from individual characteristics and lifestyles to wider economic, cultural, social and environmental conditions.

EqlA approach:

The methodology employed was devised having regard to the Equality Act 2010. As an EqlA is not a legal requirement and no formal guidance on the approach is available, a bespoke assessment was devised closely following the scope of the Equality Act, and having regard to best practice assessments carried out previously.

HRA approach:

The approach taken has sought to respond to the requirements of the 'Habitats Directive', the Conservation of Habitats Directive 2017 and recent court rulings. This legislation establishes the staged approach which commences with a screening stage. The approach taken to this screening stage specifically has drawn from key guidance including:

- The HRA Handbook from DTA Publications;
- The Department for Communities and Local Government's Planning for the Protection of European Sites: Appropriate Assessment – Guidance for Regional Spatial Strategies and Local Development Documents (Consultation);
- Natural England's Habitats Regulations Assessment Operational Standard; and,
- The European Commission Managing Natura 2000 sites (the Provisions of Article 6 of the Habitats Directive 92/43/EEC).

The findings of the stage 1 screening indicate that there is no need to progress to stage 2 of the HRA process (Appropriate Assessment).

9. How were the Framework Objectives at Table 1 of the IIA derived?

LPA Response: The IIA framework objectives detailed in Table 1 were established during the scoping stage (see EB27). The scoping stage initially comprised a review of existing information, including relevant plans and programmes and baseline information in Ealing covering a range of environmental, social and economic topics. This was used to inform the development of an assessment framework, a key output of the Scoping Report.

The assessment framework comprises a set of objectives and guiding questions which are used to assess each option, policy and allocation. The assessment (framework) objectives are based on key considerations for the Local Plan which have emerged following the review of the baseline information. Specifically, the analysis of international, national and local policy objectives, baseline information, and global events and priorities has assisted in identifying sustainability issues and opportunities for Ealing. The scope of this analysis is broad covering environmental, social (including health and equalities) and economic information, plans, programmes, and datasets, and the framework objectives reflect this broad scope.

The scoping report containing the assessment framework and the review of relevant plans, programmes and baseline information was subsequently published for consultation in January 2022. Feedback received in response to this consultation has resulted in a number of changes to the framework objectives, which are summarised in appendix A of IIA Regulation 19 Report (S16).

10. Are the baseline information and key considerations at Appendix B reasonable in terms of scope and being up to date?

LPA Response: Yes. The scope of the baseline information collated and reviewed as part of the IIA has been designed to provide the information needed to cover all sub-components of the IIA, describing information in relation to the environment, health and equalities. In the case of the HRA, this was also supplemented with additional baseline information specific to that process, namely baseline information for the National Site Network (NSN) sites derived from the Joint Nature Conservation Committee and Natural England websites.

The range of baseline information sourced, collated and analysed is comprehensive, which has been broadly organised around 12 topic areas. Some of this information was identified as part of the review of plans, programmes and strategies. Whilst the scope of the information collated is comprehensive it is also focused, and efforts have been made to ensure that the data is:

- specific to Ealing (where available at this geographical scale),
- relevant in assisting with understanding the effects of the Local Plan, and
- current, in that it represents the most recent available data.

In reviewing the baseline data regard has also been had to more recent global factors and notably the COVID-19 pandemic, which has had a substantial effect on several of the topic areas covered in the baseline, including health and well-being, economy and employment, transport and air quality. The effects of the pandemic have been experienced differently by different groups of people, and this is noted in the baseline data and has been considered carefully in the context of undertaking the EqIA. The IIA also recognises that the effects may be short-term or long-term and may not therefore be reflected in the most recent data collected. Where a COVID-19 effect appears within the data or has not yet appeared but may impact future trends, this is noted in the relevant sections.

Having collated and reviewed the baseline data the IIA identifies the key considerations which are relevant to Ealing and the Local Plan.

The baseline information and key considerations were published for consultation in the Scoping Report in January 2022. Feedback to this consultation from statutory bodies highlighted the need for a handful of updates to the baseline info, which was welcome improving its scope and accounting for the latest available information. These updates and amendments are described in Appendix A and reflected in the revised IIA baseline at Appendix B of S16.

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?

LPA Response: Yes, the assessment framework and methodology have been designed to ensure that the findings of the IIA are robust and transparent.

The IIA framework provides the basis for assessing the potential effects of the local plan. In developing the assessment framework guiding questions were established for each objective, to support a consistent and robust assessment. The assessment is based on professional judgement, using the guiding questions set out in the framework, best practice and relevant evidence to anticipate the scale of change and its impact resulting from the specific policy intervention. In all cases, the effects identified encompass those which are direct or indirect, permanent or temporary.

Consultants were selected to carry out this assessment to provide some independence from those drafting the policies, although importantly the consultants were embedded into the wider process which has been key in ensuring that the IIA process has been effective in shaping the content of the plan. The staged nature of the IIA process also assists with ensuring that the assessment is thorough, providing the opportunity to revisit the plan content and findings. At each stage, whilst a single officer has led the assessment, their findings have also been reviewed by a more senior officer and by a council officer. Generally, this has resulted in limited changes, but it should give greater confidence around the robustness of the results. Similarly, the limited number of representations challenging the IIA findings is also noteworthy and again supports a conclusion that the findings are robust.

To ensure that the findings are presented clearly and are easily understood, the assessment framework employs scoring criteria. This scoring is supported by narrative providing a concise justification for the evaluation findings. The same scoring system has been employed for the assessment of the spatial options, Strategic Policies, Town policies, Development Management Policies and allocations. The role of the IIA in shaping the preferred spatial option is documented in section 2.3 of IIA Regulation 19 Report (S16) and also as part of the Preferred Options Report (EB106).

12. Have any concerns been raised about the IIA and what is the Council's response?

LPA Response:

Reg. 18 (interim) IIA Report:

The (interim) IIA Report (EB28) was published in November 2022 alongside the Regulation 18 Local Plan. With regard to the three designated statutory bodies, Natural England responded stating that they had no comments on the interim IIA report or Reg. 18 plan. The Environment Agency and Historic England made a number of comments on the plan itself, but these didn't address the IIA specifically or its findings. In respect of feedback from other organisations and representors, references to the IIA in the context of the responding to the Reg. 18 plan were limited.

The NHS Healthy Urban Development Unit (ID ES-2121) made a number of comments on the IIA. These included various observations around the analysis of the policies in respect of health outcomes, noting that such analysis at times lacked detail and nuance. This is accepted and in part reflected the stage the plan had reached whereby certain policy details, outcomes and routes to implementation were still unknown at Reg. 18 stage. The analysis has been strengthened in the Reg. 19 IIA report, reflecting a better understanding around the policies. They have also suggested various amendments to the baseline information and assessment framework. Although these suggestions have not been carried forward, they relate to the guiding questions and criteria rather than the framework objectives and therefore are unlikely to change significantly the findings.

A separate representor (ID EA-1071) queried whether the IIA considered do nothing options or alternatives. The Council did not consider it appropriate to follow a 'do nothing' option, based on an understanding of the current issues, opportunities, the regional and national policy framework and council priorities, but instead examined various reasonable alternative spatial options. It is noted though that spatial option 1 shares similarities with the adopted Local Plan strategy but still represents an evolution from the status quo. The same representor also queried why the IIA do not include climate considerations. The Council disagrees with this

interpretation/characterisation of the IIA. As a cross-cutting theme climate change/action features throughout the IIA framework, baseline info and assessment findings. Separate framework objectives are included for both climate change mitigation and climate change adaptation, but it also forms a consideration as part of the other framework objectives. This reflects the extensive analysis of plans, programmes, strategies and baseline info which measure or respond to the climate challenge.

Two representors (ID EO-502 & ID EO-633) stated that the IIA should not be conducted by the council but should be undertaken instead by an independent body. Consultants (Arup) were selected to carry out this assessment to provide some independence from those drafting the policies.

Reg. 19 (full) IIA Report:

The full IIA report (S16) was published in February 2024, alongside publication and consultation on the draft Local Plan (Reg. 19). Feedback was invited on both. Only a handful of references are made to the IIA in respect of feedback on the Reg. 19 plan.

A number of points have been made by a single representor about a specific allocation site (21EA). Specifically, they have noted that the assessment has 'bundled' this site with two other sites. It is accepted that whilst certain sites have been grouped where they share common characteristics (sometimes locational or sometimes based on typology), separate scoring and commentary is nonetheless provided for each specific site. This is essentially a presentational matter, and there is no evidence to suggest that the site in question has been unfairly or negatively treated, and therefore the outcome of the assessment remains the same. Another representation from this representor appears to suggest that the IIA findings should be amended to better reflect the provisions of the allocation which seek to confine any built development to the previously developed part of the site. Upon further review of the IIA scoring and commentary there is nothing here to suggest that the IIA has assumed a different or more dispersed pattern of development on this allocation site. Other comments raised by this representor in respect of the IIA appear to support/endorse the findings of the IIA.

National Highways advised (Rep ID 195) that *'paragraph 5.3.1 of the Integrated Impact Assessment states that "the aim of the LB Ealing Local Plan is to improve the town for local people. Therefore, it is anticipated that traffic from outside of the LB Ealing will not increase. However, this cannot be fully ascertained without traffic modelling being undertaken for the operational stage.'* This is an accepted limitation of the assessment. The need for additional modelling work is addressed further in the response to this representation.

Natural England (Rep ID 130) also confirmed positively that they wished to raise no comments in respect of the Reg. 19 plan and IIA.

The Environment Agency (Rep ID 605) confirmed that having reviewed the plan, the IIA and relevant evidence base, that they considered the plan to have been positively prepared and sound in relation to their remit. A handful of separate points were made, but none related directly to the IIA or its findings.

Whilst Historic England (Rep ID 760) also submitted representations, similarly none related to the IIA or its findings.

Scoping Report:

Separately, as addressed in the response to questions 9, 10 and 13, feedback had previously been received from statutory bodies in response to the Scoping Report published in January 2022. This feedback resulted in a number of changes to the assessment framework and the baseline information, which are described in appendix A of IIA Regulation 19 Report (S16). This input has sought to enhance the process and does not represent commentary on the findings of the IIA or the performance of the Local Plan.

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?

LPA Response: This is addressed in Appendix A of IIA Regulation 19 Report (S16). Appendix A summarises the comments received during the consultation of the IIA Scoping Report and describes how these comments have been addressed.

In the context of ensuring that land is used efficiently and noting the emphasis placed on the reuse of brownfield sites, the Environment Agency (EA) have queried the absence of any reference to land contamination which is likely to impact on the effective use of brownfield land. They have drawn attention to the provisions of the NPPF, and specific guidance published by the EA, as well as specific Development Management requirements. In response, additional guiding questions has been added under Framework Objective 7 'Resources and land use' and Objective 10 'Water environment'. The specific EA guidance referenced has also been reviewed and considered as part of an updated review of relevant plans, programmes and strategies (see Appendix C). The specific DM policy recommendations were also considered as part of the IIA policy assessment.

In respect of the site allocations, the matter of contamination was also separately assessed as part of the site selection process. As part of this process the Council's Contaminated Land officer has reviewed the contamination risk associated with all allocation sites (see EB102, EB103 and EB104).

Historic England also raised a number of points, including requesting that the IIA process gives fair consideration to local views and listed buildings on the Heritage at Risk Register. A number of amendments were made to the IIA objectives and guiding questions to reflect this and other recommendations made by Historic England. With regard to the specific consideration of assets at risk, this is addressed directly via the site appraisal framework at Table 8. It should be noted that the assessment framework at Table 1 was adapted for the purpose of appraising the site allocations, and this is reflected in Table 8. This involved refining the guiding questions and developing additional criteria to assist with the application of the scoring criteria when applied to the assessment of sites. Additional criteria are included here which specifically seeks to recognise where allocations present an opportunity to remove assets at risk from the register. Where relevant to specific sites this consideration is also picked up in the individual site commentary in Section 4 (see site 01HA as an example).

14. Have the legal requirements for Sustainability Appraisal/ Strategic Environmental Assessment been met as part of the IIA process?

LPA Response: Yes, the legal requirements for both are satisfied as part of the IIA process.

As noted above this IIA brings together multiple assessments including a Sustainability Appraisal and Strategic Environmental Assessment, as required under separate legislation.

The preparation of a Sustainability Appraisal satisfied Section 19 of the Planning and Compulsory Purchase Act 2004, which requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a plan during its preparation.

Noting that a Sustainability Appraisal is broader in scope relative to a Strategic Environmental Assessment, considering the plan's wider economic and social effects in addition to its potential environmental impacts, the approach taken for Ealing's IIA has sought to incorporate both.

The approach taken has sought to satisfy the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations').

The table below indicates where and how the specific requirements of the Strategic Environmental Assessment Regulations have been met through this IIA process.

SEA Directive Requirements	Where and how the requirements have been addressed
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated (Reg. 12). The information to be given is (Schedule 2):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Sections 1.2, 1.3 & Appendix C of the full IIA report (S16). Sections 1.1 and 3 of the Scoping Report (EB27).
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Appendix B of the full IIA report (S16). Section 4 of the Scoping Report (EB27).
c) The environment characteristics of areas likely to be significantly affected.	Appendix B of the full IIA report (S16). Section 4 of the Scoping Report (EB27).
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 2009/147/EC (Conservation of Wild Birds) and 92/43/EEC (Habitats Directive).	Section 4 and Appendix B of the full IIA report (S16). Section 4 of the Scoping Report (EB27).
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives	Appendix C of the full IIA report (S16). Section 3 of the Scoping Report (EB27).

SEA Directive Requirements	Where and how the requirements have been addressed
and any environmental considerations have been taken into account during its preparation.	
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	Sections 2.3, 2.4, 2.5 and Appendix D of the full IIA report (S16).
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Sections 2.3, 2.4, 2.5 and Appendix D of the full IIA report (S16).
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Sections 2.2 & 2.3 of the full IIA report (S16).
i) A description of measures envisaged concerning monitoring in accordance with regulation 17.	Section 5 of the full IIA report (S16).
j) A non-technical summary of the information provided under the above headings.	Separate non-technical summaries (S15 & EB28) have been prepared to accompany the full IIA Reports at each stage
Consultation requirements	
Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5)).	Consultation on the IIA Scoping Report (EB27) was undertaken in January 2022.

SEA Directive Requirements	Where and how the requirements have been addressed
<p>Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13).</p>	<p>Consultation on the initial (EB28) and full IIA report (S16) commenced in November 2022 and February 2024 alongside Reg. 18 and Reg. 19 versions of the Local Plan respectively.</p>
<p>Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).</p>	<p>Unlikely to be relevant to the Local Plan, as there will be no effects beyond the UK</p>
Information as to adoption of plan or programme (Regulation 16)	
<p>As soon as reasonably practicable after the plan or programme is adopted, the consultation bodies, the public and the Secretary of State (who will inform any other EU Member States consulted) shall be informed and the following made available:</p> <ul style="list-style-type: none"> • the plan or programme adopted • the environmental report • a statement summarising: <ul style="list-style-type: none"> (a) how environmental considerations have been integrated into the plan or programme; (b) how the environmental report has been taken into account; (c) how opinions expressed in response to: <ul style="list-style-type: none"> (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account; (d) how the results of any consultations entered into under regulation 14(4) have been taken into account; (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme (regulation 16). 	<p>To be addressed after the Local Plan is adopted</p>

SEA Directive Requirements	Where and how the requirements have been addressed
Monitoring of the significant environmental effects of the plan's or programme's implementation (Reg. 17).	Requirement will be met after the adoption of the Local Plan

15. Overall, does the IIA meet all the relevant legal requirements?

LPA Response: Yes, the IIA meets all relevant legal requirements.

Compliance with the SA and SEA legal requirements is already addressed and demonstrated via our response to question 14 above. The methodology employed in respect of the other assessment components has similarly had regard to respective legislation, where it is bound by separate legal requirements. This is summarised below for the other components of the IIA.

HIA:

No specific legislation has been identified underpinning the HIA process.

EqIA:

Whilst the methodology employed has had regard more generally to the Equality Act 2010, which requires the Council to assess the impact of planning policy on equality and inclusion, the Equality Act does not prescribe a particular methodology for assessing the impact on equality, and there is no specific legal requirement to prepare an EqIA.

HRA:

The approach taken has responded to the requirements of the 'Habitats Directive' and the Conservation of Habitats Directive 2017. Further detail is provided in response to Q22.

Habitats Regulations Assessment (HRA):

16. How was the HRA carried out and is its methodology appropriate?

LPA Response: Whilst the HRA findings have been compiled and presented as part of the wider IIA output, the HRA process has been undertaken as a discrete exercise. The methodology employed for the HRA is described in summary form in sections 4.2 of the main body of the IIA report and in greater detail in Section 2 of appendix E (The Screening Report) of S16.

Consultants (Arup) were appointed to undertake and document the HRA process. Qualified ecologists led this work.

Section 2.2 describes the complete HRA process, although it should be noted that only the first stage – screening – has been undertaken. The methodology for the screening stage can be summarised as follows:

- Identification of all NSN sites potentially affected (including those outside of the LB Ealing Local Plan area for which impact pathways have been identified);
- A review of each site, including the features for which the site is designated, the Conservation Objectives, and an understanding of the current conservation status and the vulnerability of the individual features to threats;

- A review of the policies which have the potential to affect the NSN sites, and whether the sites are vulnerable to these effects (this has included a categorisation of the potential effects of the policy, in line with guidance from Natural England); and,
- A consideration of impacts in combination with other plans or projects.

The approach taken to each of these steps is described in greater detail in Sections 4 and 5 alongside the findings.

The methodology devised has sought to take into account the Habitats Regulations and relevant guidance and is considered appropriate and robust.

Professional judgement has been used in the interpretation of results in relation to the assessment of effects, the significance of effects and consequences for the conservation objectives of NSN sites.

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?

LPA Response: Yes, as per the Habitats Directive we are required to assess whether the Local Plan could have an adverse effect on Natura 2000 sites, otherwise known as European Sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites). Since the UK's Exit from the EU, it is acknowledged that European Sites are now referred to as National Site Network (NSN).

All NSN sites within the zone of influence of Ealing's Local Plan (in terms of possible significant effects through a known impact pathway) have been included as part of this screening exercise. This includes sites sitting beyond the Local Plan area, which may be affected by activities undertaken within the Local Plan area if they are connected by an impact pathway.

Table 2 in Section 4 lists four sites sitting beyond Ealing's Local Plan boundary which may be affected by the policies of the Local Plan, referencing their status and distance from the Local Plan boundary. Three of the four sites were scoped in.

Section 4.2 addresses how the non-NSN sites have been considered as part of the screening process. This has included considering whether the presence of non-NSN increases or reduces the potential effect of the Local Plan policies on the NSN sites. For example, this has included considering whether non-NSN sites provide an ecological connection (pathway/stepping stone) to the NSN sites sitting further afield. In the case of increased recreation pressure on NSN sites arising from growth in the Local Plan it has also been considered whether the presence of closer alternative non-NSN sites may absorb some of this demand and thus reduce the potential impact on NSN sites.

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?

LPA Response: The overall HRA conclusions are detailed in Section 6 of the screening report drawing on the findings detailed in Section 5 (Appendix E of S16). In summary this concludes that having considered the potential implications of the Local Plan on NSN sites, that none of the policies were considered to directly impact on the qualifying feature of the NSN sites, either

on their own or in combination with other plans or projects. In light of these findings, it was deemed unnecessary to progress to Stage 2 of the HRA process (Appropriate Assessment).

The screening findings are described comprehensively in Section 5 of the report. Professional judgement has been used in the interpretation of results in relation to the assessment of effects, the significance of effects and the consequences for the conservation objectives of NSN sites. As noted under Q16 above the methodology employed is consistent with best practice, guidance and legislation. The assessment was informed using the latest baseline information for the sites derived from the Joint Nature Conservation Committee and Natural England websites. The significance of the potential effects was assessed taking into account clearly established and uncontroversial standard construction industry practices that are required by current UK legislation. When considering the effects and their significance, a precautionary approach was taken in line with current guidance, whereby an effect is deemed significant if the effect cannot be ruled out on the basis of objective information.

As an additional check, aimed at reducing the potential for adverse effects on the integrity of NSN sites in the future, additional requirements relating to the Development Management process were recommended as follows:

- Any application coming forward within the LB Ealing should be subject to a detailed project level HRA where: The proposed development involves or requires the abstraction of water from the South-West London Waterbodies SPA and Ramsar reservoirs; and/or
- An air quality assessment shows that a proposed development could result in significant effects on habitats within NSN sites.

19. Have potential in combination effects been assessed?

LPA Response: Yes, the potential effects of the Local Plan policies were assessed on an individual basis, on a cumulative basis considering all relevant policies in the Local Plan, and in combination with other plans and policies. A number of other plans and strategies have been considered, including the London Plan, various mayoral strategies and the individual strategies of key infrastructure providers. The potential in-combination effects are described in Table 3 of the Habitats Regulations Assessment Stage 1 Screening Report (see Appendix E of Reg. 19 IIA Report – S16).

20. How has Natural England been involved and how have any concerns raised been responded to?

LPA Response: Natural England have been engaged at all stages of the process, which is summarised below:

Stage	Natural England input
IIA Scoping – The IIA Scoping Report (EB27) was published in January 2022, which summarised the methodology proposed for undertaking the HRA. The IIA baseline has been used to help inform the HRA.	No comments were received from Natural England on the IIA Scoping Report

Stage	Natural England input
IIA Reg 18 – The (interim) IIA Report (EB28) was published in November 2022 alongside the Regulation 18 Local Plan. This report incorporated the stage 1 HRA Screening Report dated October 2022.	Natural England responded to confirm that they had no comments to make on the interim IIA or the Reg 18 plan.
IIA Reg 19 – The IIA Report (S16) was published in February 2024. This report incorporated an updated stage 1 HRA Screening Report dated January 2024.	Natural England responded to confirm that they had no comments to make on the Reg 19, Integrated Impact Assessment or the Evidence Base for your Local Plan

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?

LPA Response: The recommended requirement to prepare detailed project level HRA is intended as a precautionary measure and to be helpful. The HRA concludes that none of the policies or allocations are anticipated to adversely impact the integrity of the NSN sites.

The recommendation describes a narrow set of circumstances when a project level HRA may be required, and accordingly it is anticipated that these would be triggered infrequently, if at all. The potential need to prepare a project level HRA is not presently highlighted in the Local Plan, but the legislation and guidance is already clear that individual planning applications can trigger the HRA process alongside spatial plans.

The recommendation does not expand or change these existing provisions but rather seeks to assist with understanding in what limited circumstances a project level HRA might be needed. The possible presence of future project level HRAs does not change the conclusions reached as part of this plan level HRA.

22. Overall, does the HRA meet all the relevant legal requirements?

LPA Response: Yes, the HRA Stage 1 Screening Report been undertaken in accordance with relevant legislation including the Conservation of Habitats and Species Regulations 2017, which transpose into law in England and Wales the requirements of EC Directive 92/43/EEC on the Conservation of Habitats and Natural Fauna and Flora (the Habitats Directive). Regard has also been had to judgement of the European Court of Justice on the interpretation of the Habitats Directive.

The screening stage responds specifically to Reg 105(1)(a) which requires the competent authority to consider whether the land use plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects.

Given that this HRA has not progressed beyond the screening stage, those aspects of the legislation which relate to post screening stages are not addressed here.

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?

LPA Response: Ealing LPA's Local Plan is in general conformity with the London Plan. Ealing's statement of common ground with the GLA clarifies the only area of disagreement as being the specific affordable housing threshold and Ealing's justification for this approach was set out in the Initial Questions and is further explored below. The statement should be taken as evidence of general conformity in all other respects.

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?

LPA Response: Yes. Duplication of London Plan policies has been avoided wherever possible, as has reformulation of existing London Plan coverage. There are minor exceptions where London Plan policies deal with matters over a series of wide-ranging policies, as in the case of Housing where this has been addressed through new Policy HOU rather than a Local Variation.

However, at Regulation 19 concerns were identified regarding duplicate policy references which could affect the clarity and effectiveness of the Plan in particular, policies relating to the Ealing Town Plan in Chapter 4 (specifically Policies E1-E4) and policies relating to Development Management in Chapter 5 (specifically Policies E3, E4 and E6 which all derive from the London Plan). A suggested modification and more detailed explanation is provided in answer to Q5 above.

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?

LPA Response: The numbering of the London Plan is complex, and given the system of local variations that add detail to generic policies it is helpful for these variations to maintain a clear reference to the policy to which they are linked. In practice, this has worked successfully and when referring to the current adopted Local Plan {EB3}, local variations are normally distinguished in planning officer reports with the prefix "LV" and this has served to avoid any confusion.

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?

LPA Response: Yes, Ealing LPA's New Local Plan includes policies addressing the mitigation of and adaptation to climate change, in accordance with the duty outlined in Section 19(1A) of the Planning and Compulsory Purchase Act 2004. For ease of reference, Section 19(1A) of the PCPA 2004, which was added by Planning Act 2008 and which has been in force since 6 April 2009, imposes a general requirement that development plan documents must, taken as a whole: *"include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change"*.

Ealing LPA's new Local Plan includes a strategic commitment to climate action and the plan identifies "Tackling the Climate Crisis" as one of its three core strategic objectives, alongside

“Fighting Inequality” and “Creating Good Jobs and Growth.” This core theme is embedded in the spatial strategy and informs both borough-wide and town-specific policies, ensuring that climate considerations are integral to the Local Plan’s vision and implementation. Therefore, as a golden thread, multiple policy areas contribute to this objective. Strategic Policy SP2 provides the overarching policy, which is supplemented by a number of other policies.

Core policies/interventions include:

- The 20-minute neighbourhood model which forms an important spatial principle underpinning the Local Plan. This model seeks to incentivise a return to ‘local living’, where travel times are shorter, and people are less dependent on cars. A number of interventions are identified in each town plan.
- A suite of policies aimed at improving building performance to reduce greenhouse gas emissions, encompassing operational energy, embodied carbon, the whole life cycle approach and circular economy. These policies re-define what qualifies as a zero-carbon development in Ealing, through establishing stretching targets for space heating demand, energy usage and embodied carbon, through mandating the use of more accurate metrics, and through prioritising the highest standards of performance on-site rather than deferring that responsibility off-site through offsetting arrangements.
- Local policy G5 which reconfirms locally the application of the Urban Green Factor target levels as already established in the London Plan, to support the aim of maximising urban greening.
- Multiple policies aimed at Protecting and enhancing the network of green infrastructure which increase opportunities for carbon sequestration and improves the resilience of the natural environment to cope with climate change. Local policies cover the protection of green space (G4) and a local approach to applying biodiversity net gain (G6)
- A spatial strategy which seeks to steer development to areas with the lowest probability of risk from flooding through the application of the sequential test, informed by the SFRA process.

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?

LPA Response: Yes, Ealing Council has taken comprehensive steps to ensure that its New Local Plan complies with the requirements set out in Section 19 of the Planning and Compulsory Purchase Act 2004 and Regulation 10 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The preparation of Ealing LPA’s Local Plan was:

- prepared in accordance with the Local Development Scheme {EB68};
- includes policies in relation to the mitigation of and adaption to climate change;
- sets out strategic policies for the area;
- is consistent with relevant national planning policies and relevant guidance {EB10 and EB11};
- is in general conformity with the London Plan {EB13};

- based on extensive public and stakeholder consultation {S20 and S21};
- ensured compliance with the council's Statement of Community Involvement published in March 2022 {EB67}; and,
- incorporates a Sustainability Appraisal (SA) as part of an Integrated Impact Assessment (IIA) {S15 and S16} to evaluate the environmental, social, and economic effects of the Plan and ensure that sustainable development principles are embedded throughout, and relevant reports are published.

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?

LPA Response: Ealing Council has taken steps to ensure that its New Local Plan aligns with the Public Sector Equality Duty as outlined in Section 149 of the Equality Act 2010. This duty requires public authorities to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between people who share a protected characteristic and those who do not; and,
- foster good relations between people who share a protected characteristic and those who do not through its policies, spatial strategy, and evidence base.

It should be borne in mind that the London Plan {EB13} is an integral part of the development plan for Ealing LPA, and this incorporates the concept of good growth. A key attribute of good growth is that it is inclusive and should build on the London's tradition of openness, diversity and equality and help deliver strong and inclusive communities {EB13, Policy GG1}. This concept of inclusivity pervades the London Plan including for example:

- delivering the homes that Londoners need by creating mixed and inclusive communities {Policy GG4};
- promoting the vitality and viability of London's varied town centres by encouraging strong, resilient, accessible and inclusive hubs with a diverse range of uses (Policy SD6);
- achieving safe, secure and inclusive environments {Policy D3};
- development proposals should achieve the highest standards of accessible and inclusive design {Policy D5}, provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children {Policy D7} and ensure the public realm is well-designed, safe, accessible and inclusive {Policy D8};
- the delivery, retention and refurbishment of supported and specialised housing {Policies H12 and H13};
- provide high quality, inclusive social infrastructure {Policy S1}; and,
- promote inclusive access to training, skills and employment opportunities {Policy E11}.

Ealing Council's approach includes:

- Policy Development: Incorporating equality considerations into the formulation of policies to address the specific needs of different groups {S16}.

- Community Engagement: Engaging with a broad spectrum of the community to gather input and understand the diverse needs and concerns of residents {S20}.
- Monitoring and Review: Establishing mechanisms to monitor the implementation of policies and assess their impact on equality objectives {S1, Appendix 1}.

Regarding policies in Ealing LPA's New Local Plan, one of the three core strategic objectives is fighting inequality {S1, Policy SP3} which emphasises the importance of reducing spatial inequalities, the promotion of a fairer start and reducing health inequalities. This is a golden thread that runs through each of the town plans in Chapter 4. Another key objective is the promotion of an inclusive economy where the benefits of new growth are spread more equally across the borough's neighbourhoods {S1, Policy SP 2.1}.

Ealing Council has demonstrated a commitment to fulfilling its obligations under the Equality Act 2010 by conducting an Integrated Impact Assessment (IIA) [S16] which includes an Equality Impact Assessment (EqIA) as a core component which provides a robust foundation for addressing inequalities and meeting the needs of individuals with protected characteristics and ensuring compliance with the equality duties.

EqIA is a means of systematically identifying and assessing the likely effects arising from the design and implementation of a proposed plan, policy, or project for people sharing one or more protected characteristics. EqIA itself is not a legal requirement and formal guidance on the approach is not available. However, it is a recognised method commonly employed to demonstrate compliance with the Equality Act. The assessment is designed to inform decision-making processes and ensure that policies and proposals within the Local Plan consider the needs of diverse communities.

Policy modifications based on EqIA recommendations that have been incorporated included minor wording changes to ensure consistency across the policies. Other recommendations included references to affordable workspace, ensuring employment opportunities for all, and ensuring night-time spaces, open spaces and the urban environment as a whole is safe and inclusive for everyone.

{END}