

Ealing LPA Local Plan (Regulation 24) 2025

Matter 2: Duty to Cooperate

Issue:

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

Written Statement on Behalf of Ealing Council

{This page is intentionally blank}

Questions:

1. Have all the genuinely strategic matters requiring cross boundary co-operation been identified?

LPA Response: Yes, we believe that all genuinely strategic matters requiring cross boundary cooperation have been identified. As a Local Planning Authority (LPA), Ealing has engaged constructively, actively and on an ongoing basis with neighbouring authorities (LPAs) and other public bodies as required by Section 33A of the Planning and Compulsory Act 2004. Ealing LPA also sits within the area of the London Plan with which it is required to be in general conformity.

Relevant strategic matters are those that have been raised through representations at Regulation 18 and 19 consultations, and ongoing meetings with neighbouring authorities and Old Oak Park Royal Development Corporation (OPDC), statutory bodies including the Mayor of London/Greater London Authority (GLA) and other general consultation bodies.

2. Have the relevant bodies the Council is under a legal duty to co-operate with been correctly identified?

LPA Response: Yes, details of all the relevant bodies identified and co-operated with can be found in the Duty to Cooperate Statement, Regulation 19 (February 2024) {S19}, and the Revised Duty to Cooperate Statement (November 2024) {S22}.

Representations at Regulation 19 were received from 24 Statutory Bodies and 56 Community Interest Groups. A full list of Statutory Bodies and Community Interest Groups who responded to the Regulation 19 consultation can be found in the council's Regulation 22 Consultation Statement, November 2024 {S20} on pages 68 to 71.

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?

LPA Response: No, the council has complied with the Duty to Cooperate in all strategic matters through multiple and comprehensive meetings both online and in person, and through discussions by email with all neighbouring authorities and other prescribed bodies. The council has not received any representation from a neighbouring authority or prescribed body to say it has not complied with the Duty.

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?

LPA Response: The Duty to Cooperate is evidenced in the Duty to Cooperate Statement, Regulation 19 (February 2024) {S19}, the Revised Duty to Cooperate Statement (November 2024) {S22}, the Statement of Consultation (November 2024) {S20} and the Statement of Consultation Appendix (November 2024) {S21}.

London Plan/GLA

Ealing has jointly worked with the Greater London Authority (GLA) on evidence documents for the London Plan and local plan evidence base including the London Strategic Housing Land Available Assessment (2017) and London Industrial Land Supply Study (2023).

Ealing is also home to two opportunity areas at Southall, and North Acton (under the jurisdiction of the Old Oak and Park Royal Development Corporation (OPDC)). The council has cooperated with GLA in the preparation of several frameworks for Southall. Similarly, Ealing LPA maintains close ties with OPDC across our planning and regeneration functions, particularly in respect of North Acton. Ealing and OPDC have also agreed a Scheme of Delegation covering specific planning responsibilities in the shared area of North Acton.

West London Alliance (WLA)

Discussions of strategic planning matters have taken place and joint West London evidence has been procured and produced under the auspices of the West London Alliance, which brings together Ealing Council along with the neighbouring local authorities of Harrow, Hillingdon, Brent, Barnet, Hounslow, OPDC, and Hammersmith and Fulham. Quarterly meetings are held at Officer and Chief officer levels to coordinate and discuss planning work and several pieces of Local Plan evidence have been jointly prepared with some or all of these LPAs, including; West London Waste Plan (2015) West London Small Sites SHLAA (2018) West London SFRA (2022) Ealing and OPDC Affordable Workspace Study (2022) West London Employment Land Review (2019), and update (2023) West London Town Centres Study (2023).

Heathrow Strategic Planning Group (HSPG)

A group to coordinate sustainable planning of the airport is formed of Ealing and various partner organisations and authorities; Thames Valley Buckinghamshire LEP, Elmbridge Borough Council, Enterprise M3 Local Enterprise Partnership, London Borough of Hounslow, Runnymede Borough Council, Slough Borough Council, Spelthorne Borough Council, Surrey County Council, Thames Valley Berkshire Local Enterprise Partnership. Shared evidence includes Heathrow Joint Spatial Planning Framework (2020) and HSPG Position Statement (2020).

Bilateral meetings

The table below sets out meeting dates with statutory bodies and matters discussed. The table excludes regular meetings set up through the WLA or HSPG forums where many of the organisations will also be represented.

Body	Dates of Meetings	Issues Covered
Mayor of London/Greater London Council (GLA)	2023.05.12 2023.09.06 2023.12.08 2024.04.08 2024.07.24 2024.07.30	Housing supply, affordable housing, industrial monitoring, industrial policies and capacity, town centres, Green Belt/Metropolitan Open Land, tall buildings, and various site allocations
Transport for London (TfL)	2023.03.03	Relationship with OPDC, infrastructure

Body	Dates of Meetings	Issues Covered
	2024.04.08 2024.08.28 2024.10.28	requirements, developer contributions, car parking, active travel
LB Brent	2023.03.01 2023.03.28	Reg 18 and 19 reps
LB Harrow	2023.03.28 2024.08.24 2024.05.16	Reg 18 and 19 reps
LB Hillingdon	2022.07.08 2023.03.01 2024.04.23	Reg 18 and 19 reps
LB Hounslow	2024.10.07 2024.04.05 2025.01.31	Reg 19 reps
LBHF	2023.03.01 2023.03.20	Reg 18 reps
Old Oak and Park Royal Development Corporation (OPDC)	2023.03.13 2024.03.10 2024.03.28 2024.04.18	Reg 18 and 19 reps
Historic England	2024.04.24	Policy formats, Policy D9, building heights in site allocations, Kew World Heritage Site, archaeological priority areas, design codes, Heritage Impact Assessment
National Highways	2025.02.27	Traffic modelling
NHS	2024.04.05	Reg 19 reps
Sport England	2024.06.12	Reg 19 reps

The table below summarises engagement with Statutory Bodies and neighbouring authorities.

Body	Regulation 18		Regulation 19	
	Notified	Comment	Notified	Comment
GLA	✓	✓	✓	✓
LB Brent	✓	✓	✓	✓
LB Barnet	✓		✓	
LB Hammersmith & Fulham	✓	✓	✓	✓
LB Harrow	✓	✓	✓	✓
LB Hillingdon	✓	✓	✓	✓
Old Oak and Park Royal Development Corporation (OPDC)	✓	✓	✓	✓
Historic England	✓	✓	✓	✓
Environment Agency	✓	✓	✓	✓
Natural England	✓	✓	✓	✓
Civil Aviation Authority	✓		✓	
Network Rail	✓	✓	✓	✓
West London NHS	✓	✓	✓	✓
Transport for London (TfL)	✓	✓	✓	✓
MoD (RAF Northolt)	✓	✓	✓	✓
National Highways	✓		✓	✓
Metropolitan Police Service	✓	✓	✓	✓
Thames Water	✓	✓	✓	✓
Affinity Water	✓	✓	✓	✓

Statements of Common Ground (SoCG)

SoCG have been agreed with the following Statutory Bodies and neighbouring authorities:

- LB Brent {S22a}
- LB Brent/Harrow on Burial Space {S22g}
- LB Harrow {S22e}

- LB Hillingdon {S22i}
- LB Hounslow {S22f}
- OPDC {S22h}
- Greater London Authority/Mayor {S22d}
- Historic England – to follow {S22j}
- National Highways – to follow {S22k}
- Sport England – awaiting final signature {S22c}
- Transport for London (TfL) {S22b}

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?

LPA Response: Yes, Ealing Council has engaged constructively actively and on an ongoing basis with neighbouring authorities and prescribed bodies on strategic matters with cross-boundary impacts as is evidenced by the responses to previous questions above. Engagement has been conducted through bilateral meetings, fora such as the WLA and HSPG, and Statements of Common Ground, evidence of which is set out in the Duty to Cooperate Statement (February 2024 {S19} and the Revised Duty to Cooperate Statement (November 2024) {S22}.

Council officers continue engage with neighbouring authorities through the WLA on strategic matters including the Joint West London Waste Plan and with the GLA on the London wide Gypsies and Travellers Accommodation Needs Assessment and the Land for London exercise. Planning officers maintain excellent relationships with neighbouring authority officers and are always willing to discuss strategic cross boundary and other planning matters.

{END}