Ealing LPA Local Plan (Regulation 24) 2025

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.

Written Statement on Behalf of Ealing Council

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Questions:

Vision and Objectives

1. Is the Boroughwide Vision for the Plan ambitious, yet realistic, with appropriate alignment with the London Plan?

LPA Response: Yes. London has experienced a period of sustained growth over the past decade, which is reflected in Ealing and its continual evolution within London. This strategic and borough context is set out in more detail in Chapter 2 of the Plan {S1; Para 2.4-2.23} including proximity to Heathrow Airport, the new HS2 interchange at Old Oak Common and the five new Elizabeth Line stations (which opened in 2022) have resulted in an increase in connectivity and have served as a catalyst for significant change and development.

The development of the Ealing LPA's Local Plan is closely aligned to the strategic vision and key priorities that are outlined in Ealing Council's Council Plan 2022- 26 {EB66}. The Council Plan identified three cross cutting strategic objectives. These are tackling the climate crisis, fighting inequality, and creating good jobs and growth, and each is informed by the social, economic and environmental challenges and trends that the borough will encounter over the next fifteen years.

To deliver on these strategic objectives, a series of nine priorities have also been identified. The three strategic objectives and nine priorities together inform the development of the overarching 15-Year Vision and spatial strategy set out in Spatial Strategy {S1, Chapter 3}. This also provides the structure for the subsequent borough-scale, town-scale, and development management policies. It also aims to provide a locally distinctive and relevant planning policy framework for the area.

In particular, Ealing LPA's Local Plan is underpinned by 'sustainable polycentrism'. This means having a more fair and balanced approach to new development and investment, whereby all the seven towns will have a prominent role in accommodating growth, and as a result will benefit fairly from new investment.

Ealing LPA's Local Plan operates within the wider strategic framework of the London Plan which is an integral part of Ealing's local development plan. It is closely aligned and incorporates the concept of 'Good Growth,' which underpins the London Plan {EB13, Chapter 1}. This is focussed on ensuring that future growth within London and its boroughs is socially and economically inclusive and environmentally sustainable. Therefore, the objective of Ealing LPA's Local Plan is to help deliver these strategic drivers at a local level, while ensuring that Ealing's unique character is respected and celebrated, and that the borough's economic role to the wider London region is maximised.

The policies within Ealing's Local Plan must also be read in conjunction with the London Plan (2021) which is an integral part of Ealing LPA's development plan. Figure SS1 {S1} lists the Mayor's Good Growth objectives and illustrates how they are connected to the Local Plan vision, themes and the spatial strategy and this has been welcomed by the Mayor of London. To avoid repetition, we have drafted the Local Plan policies in such a way that they follow on directly from policies set out within the London Plan and do not duplicate.

A helpful wayfinding tool {S1, pp.28-29} signposts the key overarching themes and related policies within the London Plan and the policies within Chapters 3 and 5 of Ealing LPA's Local Plan, where relevant.

2. Are the objectives of the Plan clearly set out and measurable?

LPA Response: Yes. Monitoring is an essential and ongoing activity supporting the preparation and implementation of Ealing's Local Plan. Monitoring will allow us to assess the extent to which Local Plan policies are achieving the vision and spatial objectives of the plan; whether any new policies, policy adaptions or other interventions are needed to help with delivering the strategy; and whether the policies and strategy are aligned with the latest issues affecting the authority and other external factors. To support this process a monitoring framework has been developed {S1, Appendix A.1}.

Spatial Strategy – general issues

3. Does the choice of Spatial Strategy flow logically from the conclusions of the IIA?

LPA Response: Yes. The preparation of the Ealing LPA's Local Plan includes an assessment of how policies could influence the environment, health and equalities. As the assessment covers these three different areas, it is called an Integrated Impact Assessment (IIA) {S16}.

The purpose of the IIA is to highlight and, where possible, address any undesirable effects that may arise on the environment or on health or equalities as well as identify opportunities for improvements.

All Ealing LPA Local Plan policies, including alternative policy options, have been fully appraised in the IIA.

4. How have impacts beyond the Borough boundary been considered and reflected in the choice of Spatial Strategy?

LPA Response: The strategic context has played a vital role in shaping the choice of spatial strategy. As noted in the preferred options report {EB106}, Ealing is an outer London borough strategically located in West London, with connections to both London's Central Activities Zone and Heathrow Airport. With its location next to and relationship with the UK's largest international airport and an extensive strategic rail and road network, it is a highly connected borough.

It should be noted that the London Plan {EB13} is an integral part of the statutory development plan for the Local Planning Authority in Ealing and that Ealing LPA's Local Plan must be in "general conformity" with it. This provides a strategic framework for those parts of London that will see significant development over the lifetime of the Plan and addresses how change will be managed for London's most sensitive and complex places.

Ealing LPA's spatial strategy therefore builds upon the wider London Plan Spatial Framework and is part of a strategic growth corridor identified in the London Plan {EB13, Paras 2.1.64 - 2.1.67} which encompasses the Heathrow and Elizabeth Line West. This radial growth corridor encompasses the Uxbridge Road / Elizabeth Line that traverses the borough from east to west and includes Ealing Metropolitan Town Centre and the town centres of Acton, Hanwell and Southall. The latter is also an Opportunity Area.

This also combines with the significant role that Ealing plays in the provision of industrial land to service London wide need which places the borough at the productive heart of West London. This is recognised in the 'Ealing Productivity Arc' which connects the HS2 terminus with Heathrow Airport, joining up strategic industrial growth opportunities across Perivale, Greenford, Northolt and Southall.

Furthermore, 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 has also 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}.

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?

LPA Response:

Yes, Ealing LPA's Local Plan Policies SP2-SP4 provide a clear mechanism for translating the vision into actionable outcomes. The development of the Ealing LPA's Local Plan is closely aligned to the strategic vision and key priorities that are outlined in Ealing Council's Council Plan 2022- 26 {EB66}. This ensures that the core themes, strategic objectives and priorities of the Local Plan are fully aligned and combine to form the bedrock for clear and coherent delivery of the vision. Monitoring is an essential and ongoing activity supporting the preparation and implementation of Ealing LPA's Local Plan. To support this process a monitoring framework has been developed, found at Appendix A.1 (S1}.

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?

LPA Response: Yes, it is. As outlined in the responses to the sub-questions below, infrastructure planning in the Ealing LPA's Local Plan has considered all the main infrastructure needs of the borough and has been informed by extensive engagement with infrastructure providers and other key stakeholders. London Plan policies form part of the statutory development plan for Ealing, therefore the Plan does not seek to duplicate or alter these policies.

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?

LPA Response: The Infrastructure Delivery Plan (IDP) {EB83} provided a comprehensive assessment of the borough's infrastructure needs including:

- Community facilities;
- Digital connectivity;
- Education;
- Emergency services;
- Energy and utilities;
- Flood management;
- Green infrastructure and open space;
- Health and social care;
- Sports and leisure facilities;
- Transport; and,
- Waste management facilities.

The assessment was informed by extensive engagement with key stakeholders and infrastructure providers including:

- Affinity Water
- Environment Agency
- National Health Service
- National Highways
- Network Rail
- London Fire Brigade
- Metropolitan Police
- Thames Water
- Transport for London
- Scottish and Southern Electricity Networks

It also included engagement with all the council's relevant service departments including transport, public health, leisure and education.

The IDP considered the infrastructure provision and needs of each of the borough's seven towns, reflecting their different needs and priorities.

The Infrastructure Delivery Schedule (IDS) {EB84} provided a summary of the key infrastructure needs of the borough, broken down by infrastructure type and town. It also provided an initial assessment of potential funding sources and delivery owners.

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?

LPA Response: They are. Please refer to the previous answer.

c. Do key infrastructure dependencies align with planned growth (including where development is reliant on flood prevention and mitigation)

LPA Response: Yes, they do. The IDP was undertaken at the same time as the development of the new Local Plan, in an iterative process that took into consideration the level and spatial

distribution of planned growth. In turn, the new Local Plan was informed by the infrastructure analysis.

IDPs are, by their nature, a 'snapshot in time'. As infrastructure needs and planned growth evolve, Ealing's IDP will need to be monitored and updated. Ealing Council is planning to prepare a new IDP in 2026, to align with the emerging new London Plan.

d. Are infrastructure dependencies and how will impact on the deliverability of the growth in the plan sufficiently understood?

LPA Response: Yes, please refer to the previous answer.

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?

LPA Response: Yes, there is proportionate evidence. The key aspect considered was to what extent a strategic transport model of the borough would usefully contribute to evaluating and mitigating any impacts of the Plan on the road network. The Plan has been developed in the context of the shift in transport policy away from defaulting to providing additional highway capacity to support planned growth, and towards the position that walking, cycling and public transport must be the prioritised modes to deliver the high-density development required. This is the policy position underpinning the London Plan and the Mayor's Transport Strategy.

It was therefore decided not to commission a strategic transport model, and to promote walking, cycling and public transport measures throughout the Plan as core enablers of growth in each town. Additionally, an estimation of the trips that may be generated from each site should they be brought forward as proposed is being conducted. This piece of work is currently underway, and forms part of the discussions with National Highways with a view to agreeing the Statement of Common Ground. The estimates will provide a high-level evidence base for the potential impacts of the Plan on the road network.

An understanding of the potential effects of the growth in the Plan on the road network has also been developed as part of other transport programmes, particularly in the case of Northolt, which is of particular relevance given its generally lower PTAL. For Northolt, the council and Transport for London jointly commissioned a strategic modelling exercise specifically to examine the impacts of the Local Plan growth scenario on the local road network. The modelling Forecasts for 2041 were produced, with a focus on the AM Peak (busiest morning hour on the network). Three scenarios were forecast:

- 2041 'Base Minus' (accounting for GLA's growth assumptions, but with development related to Northolt Local Plan removed)
- 2041 Local Plan (development assumptions including 1,950 households and 81,190 sqm of employment land uses)
- 2041 Local Plan Plus (a more ambitious level of development than contained in the Local Plan, to include 3,770 households and 117,690 sqm of employment land uses).

In summary, the impact of background growth from 2019 to 2041 is larger than the development impacts. Car equivalent kilometres travelled within Northolt are forecast to increase by 9% between 2019 and 2041 as a result of background growth. The developmental impact of the Local Plan increases this by a further 1%. The public transport network is expected to have

sufficient capacity to support the development impacts, although vehicle speeds are forecast to reduce from 23.8kph in 2019 to 21.3kph (14.8mph to 13.2mph) in the Local Plan scenario.

The modelling study highlighted a need for intervention to support active travel, which is the approach taken in the Plan's spatial strategy for Northolt. Although an example for one town, this evidence is a proportionate approach – aligning with council and Transport for London priorities to deliver improvements to Northolt – and indicates that the impacts of the Plan on the road network will be minimised well ahead through planning suitable interventions at each site and will overall be manageable.

The measures to mitigate negative impacts on the road network, including measures to promote active travel, will be effective. The Plan is consistent with London Plan policy on car parking provision, ensuring car-free development wherever possible and car-lite in areas where access to public transport is more limited. Providing minimal or no car parking is an established method for reducing trips generated by new developments, when implemented in conjunction with improvements to walking, cycling and public transport connections. The Plan's approach to improving these connections, aligned with the 20-minute neighbourhood approach, will ensure that the planned growth can be delivered with minimal adverse impacts on the road network.

8. How has the availability of key public services influenced the Spatial Strategy, including emergency services, wider medical, and schooling been considered?

LPA Response: The IDP {EB83} considered key public services including emergency services (please see Section 2.9 of the IDP), health (Section 2.5), and education (Section 2.4). This included comprehensive engagement with relevant stakeholders and statutory bodies. The IDS {EB84} identified the key public services priorities over the new Local Plan period.

9. How has flood risk influenced the choice of Spatial Strategy? Is the approach to assessing risk robust and consistent with national policy?

LPA Response: The development and assessment of spatial options and the subsequent spatial strategy was informed by:

- The emerging evidence base – including the Strategic Flood Risk Assessments (SFRA).
- Baseline information – including an understanding of environmental constraints, incorporating flood risk.
- The council's priorities – including the Council Plan and the Council's Climate and Ecological Emergency Strategy, with both emphasising resilience.
- Regional and national policy framework steering development towards low-risk areas
- The growth requirements – and the desire to accommodate this growth within low-risk areas.

In respect of flood risk the work around spatial options was informed by an understanding of the geographical risk as documented in the Level 1 SFRA (EB100), and also having regard to specific national, regional and local priorities around improving resilience to climate change impacts. The dispersed nature of surface water risk in particular was noted, particularly in the context of meeting growth requirements. The relative risk and opportunities in respect of flooding were assessed for each of the spatial options. As per national planning practice guidance the authority has used the findings of the SFRA to inform the scope of the Sustainability Appraisal. Two of the IIA framework objectives (10 & 12) directly address flood risk, and their application via the assessment process is informed by the SFRA findings. The IIA process has provided a

consistent basis to appraise the spatial strategy and policies, with the aim of shaping a spatial strategy and policies which avoids risk and manages it where needed. The findings of the assessment of the spatial options and strategic policies is addressed in sections 2.3 and 2.41 of the IIA (S16), with considerations of flood risk featuring prominently.

The consideration and development of the preferred spatial option and strategy was also informed by the character study – which itself was informed by analysis of physical characteristics (encompassing environmental risks) including flooding.

This understanding of the risk and priorities is also reflected via the strategic policies of the plan and namely policy SP2, which establishes a clear action around preventing an increase in flood risk from inappropriately located and designed development and supporting flood resilience and alleviation projects.

The Level 2 SFRA (EB97) has also generated the information needed to undertake the Sequential and Exception Tests of site allocations. Section 2.5.2 of the IIA (S16) considers whether the planned growth via the site allocations cumulatively can be wholly accommodated in flood zone 1, and if not whether the reliance on sites sitting in areas of higher risk can be justified.

Qualified and experienced consultants (Metis) were appointed to prepare the Strategic Flood Risk Assessments. The Level 1 SFRA was prepared jointly with neighbouring authorities in West London, with the Level 2 SFRA being undertaken individually. The approach taken for both the Level 1 and Level 2 SFRAs is consistent with the NPPF and NPPG. Section 2 of the Level 1 SFRA explains how the policy framework has informed the approach taken. The Level 2 SFRA also accounts for policy updates which have taken place since the publication of the Level 1 SFRA – this is addressed in section 1.2.1 of the Level 2 SFRA.

To ensure consistency with national policy, oversight was also provided by the Environment Agency (EA). For the Level 1 SFRA the EA were engaged directly via a Service Level Agreement which allowed them to provide technical assistance and advice during the preparation and finalisation of the SFRA. The EA were also engaged during the preparation of the Level 2 SFRA to obtain data and to test aspects of the methodology.

Such efforts have ensured that the assessment is informed by the latest EA and Thames Water Utilities Limited datasets from 2023 and the latest River Brent model data from 2017.

As noted above the approach taken to establishing risk, and the application of this evidence to the sustainability appraisal process is consistent with national policy and guidance. The application of the sequential and exception tests in particular has adhered closely to this guidance. One notable distinction is highlighted in respect of the definition of flood zone 3a. Acknowledging the specific risks around surface water affecting urban authorities in West London, the Level 1 SFRA extended the definition of flood zone 3a to also account for surface water risk, alongside the usual consideration of fluvial risk. As mapped flood zone 3a is split into fluvial and surface water subsets, with both informing consistently the application of the sequential and exception tests and the sustainability appraisal process. This approach of also zoning surface water risk was supported by the Environment Agency.

The Environment Agency have separately considered the totality of the process and outcomes. The Environment Agency at Reg. 19 (Rep 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. This should provide additional confidence around the

consistency of the approach taken against national policy and the robustness of the findings and outcomes.

10. Paying regard to Thames Water's Regulation 19 response, does the growth in the Plan take adequate account of water and wastewater infrastructure?

LPA Response: Ealing Council engaged with both Thames Water and Affinity Water as part of the preparation of the IDP which informed the new Local Plan. The council is keen to continue this engagement going forward.

Water and wastewater are covered in the IDP in section 2.10. Any key infrastructure needs and/or projects identified by the water companies have been included in the infrastructure analysis that informed the new Local Plan.

In terms of Thames Water's Regulation 19 response, Ealing's new Local Plan makes it clear that it does not seek to duplicate every London Plan policy. Paragraphs 1.10 and 1.11 of Ealing's new Local Plan state that:

"The London Plan is an integral part of the statutory development plan for the Local Planning Authority in Ealing. The approach of Ealing's Local Plan is to not repeat the London Plan policies as they already form part of the statutory development plan for the area."

London Plan Policy 'SI 5 Water infrastructure' clearly covers the points about water supply and reducing the demand for water in new development. Since Ealing Council does not propose any local variations on this policy and since we clearly state that London Plan policies already form part of the statutory development plan for Ealing, there is no need for duplication.

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?

LPA Response: The council undertook a comprehensive review of its Green Belt and Metropolitan Open Land (MOL) as part of the preparation of the new Local Plan. The purpose of this exercise was to assess if the green open spaces have the appropriate designations and there is consistency in how these designations are applied across the borough. Ealing Council had not previously undertaken a comprehensive assessment of its Green Belt and MOL sites since they were originally designated four decades ago.

All Green Belt sites were assessed against the NPPF's Green Belt criteria and all MOL sites were assessed against the London Plan's MOL criteria. The assessment was undertaken using a systematic and consistent methodology that included site visits, desktop review, use of GIS, and consideration of each site's context, characteristics, and use.

The review recommended a number of Green Belt/MOL boundary corrections to ensure GB and MOL boundaries are up-to-date, correct, and defensible. For a small number of sites (or parts of sites) that do not contribute towards Green Belt/MOL objectives, and which could be used to meet identified development needs, it recommended a change in designation, demonstrating the corresponding exceptional circumstances.

The proposed boundary changes fall into two categories:

- Boundary corrections to accurately reflect the current reality and use of sites – the purpose of these corrections is to ensure Green Belt and MOL sites have correct, up-to-date, consistent, and defensible boundaries, to minimise the risk of inappropriate development.
- Boundary changes where a site has been identified for development and allocated in the new Local Plan - there are a small number of sites (or parts of sites) that do not contribute towards Green Belt/MOL objectives and which could be used to meet identified development needs and thus are identified for change in designation, demonstrating the corresponding exceptional circumstances. The following site allocations assume release and support the achievement of key strategic policy actions as follows:

Strategic Policy Objective/Action/Intervention	Site Allocation
• SP3.1D – Investing in a new purpose built GRT site	• 09NO – Kingdom Workshop
• SP4.2E – Growing the size and range of employment offer	• 04NO – Northolt Driving Range • 04PE – Alperton Lane South and Metroline Depot
• SP4.3A – Meeting the 21,570 unit 10-year housing supply target identified in the London Plan • SP2.2(ii) – Facilitating the enhancement of existing green infrastructure • SP4.1C – Ensuring the efficient use of land	• 19EA – Gurnell Leisure Centre • 21EA – Former Barclays Sports Ground • 23EA – Old Actonians Sports Ground • 04GR – Westway Cross • 06GR - Smiths Farm • 02PE - Land South Side of Western Avenue • 23EA - Old Actonians (23EA).

Boundary changes also include several additions of land to existing Green Belt and MOL sites, to better define their boundaries.

All the boundary corrections and changes are clearly presented in the 'Atlas of Change' {S17} that accompanies the new Local Plan.

Policy SP2:

12. In terms of Policy SP2:

a. what is its purpose and is its scope appropriate?

LPA Response: The development of the Ealing LPA's Local Plan is closely aligned to the strategic vision and key priorities that are outlined in Ealing Council's Council Plan 2022- 26

{EB66}. The purpose of Policy SP2 is to help tackle the climate crisis. The scope of Policy SP2 therefore seeks to deliver three main priorities:

- An inclusive economy - by building wealth within the community by ensuring everything the council does contributes to social value and makes Ealing a fairer place to live and work.
- Climate action – by greening and keeping Ealing clean, achieving Net Zero Carbon, and ensuring Ealing's parks, open spaces and nature are protected and enhanced
- Thriving communities – by bringing people together to build strong neighbourhoods, empowering volunteers, encouraging community activism, engaging civic and faith leaders, and delivering community facilities and services.

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?

LPA Response: The Council's ambitious climate targets, as captured in the Council's 2021 Climate and Ecological Emergency Strategy (CESS), and reflecting the declaration of a climate emergency in April 2019, has helped to drive progress in decarbonising the borough, the Council's activities and its estate. Carbon emissions in Ealing have reduced by 42% between 2005 and 2022 and are below the London average per capita. Baseline data, including local authority emission data published by BEIS, informed the initial establishment of this target.

The climate and ecological emergency strategy (published 2021) commits to providing progress updates every two years, and to share key achievements from across the community in tackling the crisis. The Council has published one progress report thus far in 2023, which reports on progress against key milestone activities, with an emphasis on community led projects aimed at addressing climate justice. A number of these activities and outcomes have been facilitated and shaped by the planning process. The borough hosts a considerable 14.5MWp of existing and scheduled rooftop solar installations across almost 900 arrays. New builds in recent years only exceptionally use gas boilers for heating (which account for c.40% of current emissions profile in the borough); and car-free developments are the norm (transport accounts for a further c.40% of the emissions profile in the borough).

Local Plan Policy SP2 seeks to build from the progress made to date, maximising the contribution made by the planning process to achieving the Council's ambition to be carbon neutral by 2030. Policy SP2 reflects the target set through the CEES, rather than setting it itself. It is acknowledged that the target is ambitious and the text as drafted recognises that planning is a key contributor, but that the achievement of the ambition is also contingent on activities and factors operating beyond the planning process. The target as established in the CEES was based on certain underlying assumptions around commitments from the previous Central Government to regulatory changes and strategic investment which have not all been forthcoming, and which has made delivering the strategy far more challenging. Regardless of this challenge, the goal of becoming carbon neutral remains, and it is imperative that the Local Plan seeks to influence this outcome driving progress towards a net zero carbon borough.

c. Does SP2.3 sufficiently reflect the diversity of the community of the Borough?

LPA Response: Yes. Policy SP2.3 does not predetermine what social infrastructure or community facilities are needed or limit this to specific sections of the community, and therefore it has been written to be as inclusive as possible reflecting the needs of Ealing's diverse population.

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?

LPA Response: Yes. Creating vibrant 20-minute neighbourhoods means delivering new local jobs, services and amenities, and the sustainable and active travel infrastructure required to access these. This means reinforcing and growing our existing network of local high streets, town centres and commercial areas. It is about making Ealing a more sustainable and polycentric borough, where investment and opportunity is fairly distributed across multiple centres, each promoting prosperity for the communities they serve.

These aspirations are a key plank of Ealing Council's Council Plan 2022- 26 {EB66} and are included most prominently in Ealing LPA's New Plan in Policies SP1 and SP2.2. The Mayor of London has been broadly supportive of the council's approach. The approach is entirely compatible with the policies and objectives of the London Plan (2021) which says that local and neighbourhood centres should focus on providing convenient and attractive access by walking and cycling to local goods and services needed on a day-to-day basis {EB13, Policy SD8}.

Some other key references in the London Plan (2021) include:

- To encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area {EB13, Policy D3}.
- To promote inclusive design which is indivisible from good design. Development proposals should help to create inclusive neighbourhoods that cumulatively form a network in which people can live and work in a safe, healthy, supportive and inclusive environment. An inclusive neighbourhood approach will ensure that people are able to easily access services, facilities and amenities that are relevant to them and enable them to safely and easily move around by active travel modes through high-quality, people-focused spaces, while enjoying barrier-free access to surrounding areas and the wider city {EB13, Policy D5 and Para 3.5.6}.
- To maximise the contribution that the public realm makes to encourage active travel and ensure its design discourages travel by car and excessive on street parking {EB13, Policy D6}.
- To promote new and improved walking, cycling and public transport networks should be planned at an early stage, with delivery phased appropriately to support mode shift towards active travel and public transport. Designs for new or enhanced streets must demonstrate how they deliver against the ten Healthy Streets Indicators. A key metric is the Mayor's aim that by 2041 all Londoners will be able to undertake at least the 20 minutes of active travel each day which is needed to stay healthy {EB13, Policy T2 and 10.2.3).
- To safeguard existing land and buildings used for public transport, active travel or related support functions (unless alternative facilities are provided) and sets out an indicative list of transport schemes that promote healthy streets and active travel. It also notes that the way in which developments connect to local public transport and active travel networks plays a critical role in widening transport choice across London and therefore it may be necessary for proposals to facilitate the delivery of local connections through,

for example, provision of land for walking and cycling routes or bus stops and supporting infrastructure. {EB13, Policy T3, Table 10.1 and Para 10.3.6}.

Furthermore, the NPPF also emphasises the importance of sustainable transport and says that opportunities to promote walking, cycling and public transport use should be identified and pursued, and planning policies should provide for attractive and well-designed walking and cycling networks with supporting facilities {EB10, Chapter 9}. Planning policies and decisions should aim to achieve healthy, inclusive, accessible and safe places {EB10, Para 96 and 135 f).

In terms of delivery, examples include:

- Directing development to sustainable locations that are well connected to sustainable transport modes or within close proximity to town centres.
- Creation of new neighbourhood centres at Acton Mainline Station {S1, Policy A4}, the White Hart Roundabout {S1, Policy N3} and Perivale Station {S1, Policy P4} and plans to enhance both existing neighbourhood and local centres.
- Support for investment in public transport and active travel in both borough wide and town infrastructure schemes and as a key infrastructure requirement for many of the site allocations. This will be augmented by a comprehensive delivery plan.
- Collaboration between scheme promoters and the Council is essential for delivering vibrant, accessible, and sustainable 20-minute neighbourhoods in Ealing. This partnership ensures the correct provision of services and amenities, aligning new developments with the community's needs. The council will also ensure that this approach is embedded into commissioned housing and regeneration partnerships and major projects, for example on Acton Gardens to review and assess the social impact of regeneration.
- Funding for additional projects will draw on a combination of resources, including S106 developer contributions and the Community Infrastructure Levy (CIL). Neighbourhood CIL will focus on delivering local projects that address community priorities, with the new 'Your Voice, Your Town' approach being used to ensure funds are allocated in ways that directly benefit residents. This approach ensures a collaborative process where identified needs are met through targeted investments.

Policy SP3:

13. In terms of Policy SP3:

a. what is its purpose and is its scope appropriate?

LPA Response: The development of the Ealing LPA's Local Plan is closely aligned to the strategic vision and key priorities that are outlined in Ealing Council's Council Plan 2022- 26 {EB66}. The purpose of Policy SP3 is to help fight inequality. The scope of Policy SP3 therefore seeks to deliver three main priorities:

- Tackling crime and inequality – by focusing on reducing poverty and inequality for those that most need support and promoting wellbeing and safety for all.
- A fairer start – by ensuring all our children and young people get the best start in life, from their earliest years through to a great education.
- Healthy lives – by protecting and enhancing the physical and mental health of all, supporting our older residents to enable them to remain independent and resilient and dealing with the impact of COVID-19.

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?

LPA Response: Yes absolutely. The overall goal of policy SP3 is to tackle inequality and increase inclusion. As part of the IIA, the findings of the EqIA have recognised the inclusive nature of this policy (see Section 3 of S16).   It identifies positive effects for women, the elderly, the disabled, the LGBTQ+ population, the Gypsy, Roma and Traveller community, lower social economic groups, young people, ethnic minorities and religious groups.   Importantly the EqIA concludes that 'no negative effects associated with this policy have been identified for any protected characteristic'.

c. are any modifications required so that it adequately responds to tackling all of the matters falling within its scope?

LPA Response: No, other than the council's schedule of suggested minor modification {S24} which seek to make any corrections or provide better clarity arising mostly from either representations made at Regulation 19 or Statements of Common Ground with any prescribed bodies. Of particular relevance to Policy SP3 is SMM12 which refers to a separate schedule of minor modifications to ensure the Local Plan is now properly aligned with the Ealing Cycle Network Plan (S24a}.

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?

LPA Response: There are no implications.

Air Quality Focus Areas (AQFA) in London are identified by the GLA. The Focus Areas are locations that not only exceed the EU annual mean limit value for nitrogen dioxide (NO2) but are also locations with high human exposure. AQFAs are not the only areas with poor air quality but they have been defined to identify areas where currently planned measures to reduce air pollution may not fully resolve poor air quality issues. These do not represent an exhaustive list of London's hotspot locations but reflect where the GLA believe the problem to be most acute. These are defined and collated as part of the GLA's London Atmospheric Emissions Inventory. The Focus Areas inform the application of London Plan policy SI 1 and are mapped in Figure 9.1 of the London Plan. London Plan policy SI 1 recognises that the LAEI is a live resource and according advises that the list of Air Quality Focus Areas is updated from time to time as the London Atmospheric Inventory is reviewed and the latest list in the London Datastore should always be checked.

It is the council's understanding that the Inventory (including the Focus Areas) were last updated in 2019. Despite being published after 2019, the extent of the Focus Areas shown in the London Plan differ slightly (these differences relate to Greenford and Southall). The reason for this difference is unclear. With one difference around Southall the Focus Areas shown in Figure 14 of the Health Study reflect those presented in the London Plan. The focus areas presented in the IIA (at figure 24) match those shown in the London Plan.

The Focus Areas shown in figure 6.6 of the OPDCs Local Plan reflect neither the LAEI 2019 update, the 2021 London Plan, or their own supporting evidence. In so far as this relates to the OPDC LPA area we have no issue with this difference, nor are we able to offer an explanation as to why this difference exists. Figure 6.6 does however map focus areas which lie predominately or wholly in Ealing LPA area, and there are notable differences between these and the GLA Plan

sources as already noted above. As noted previously in responding to the original representation, the council has committed to making any updates/corrections as necessary in any future updates of its health evidence base and will do this having regard the appropriate source data (in this case the GLA).

Finally, to avoid any inconsistency, we could mask out the OPDC from such mapping.

Policy SP4:

14. In terms of Policy SP4:

a. what is its purpose and is its scope appropriate?

LPA Response: The development of the Ealing LPA's Local Plan is closely aligned to the strategic vision and key priorities that are outlined in Ealing Council's Council Plan 2022- 26 {EB66}. The purpose of Policy SP4 is to create good jobs and growth. The scope of Policy SP4 therefore seeks to deliver three main priorities:

- Good Growth – by making sure the growth that takes place in Ealing enhances its character, conserves its future and makes a great place where people want to live.
- Decent living incomes – by bringing new and well-paid jobs back to Ealing and ensuring good businesses can thrive.
- Genuinely affordable homes – by delivering a radical programme of social rent council house building, affordable homes and ensuring tenants are empowered and have ownership of their communities.

b. are the ways of promoting good growth at SP4.1 (a) to (g) aligned and in general conformity with the London Plan?

LPA Response: Yes, all of these policy approaches are in general conformity with the London Plan and accord well with its approach to good growth.

The London Plan sets out that good growth should be inclusive, make best use of land, create a health city, deliver the homes and jobs that Londoners need, and improve the efficiency and resilience of the city. Ealing LPA's Local Plan is based upon socially and geographically inclusive growth, that meets assessed housing needs and increases the number and quality of jobs and implements sustainable and resilient patterns of growth across the Borough's seven towns and which preserves and enhances its built and natural heritage.

The London Plan's overarching approach to design is set out in Policy D1 and starts from a baseline of local character including not just built environment and heritage, but also local demographic data, environmental quality and constraints, and housing types and tenure. Ealing LPA's Local Plan implements the evidence of the character study, which goes beyond built form to consider how history and topology has influenced urban growth in the borough, and also advocates heritage-led regeneration, and healthy forms of urban growth evidenced by the comprehensive local plan Health Study.

The objective of sustainable locations and efficient land use are inherently linked and are integral both to the London Plan's policies to optimise growth but also to Ealing's polycentric approach to growth and the detailed guidance on scale and density that are set out in site allocations. Ealing's detailed approach to tall buildings is well-evidenced and contextual and further implements the sustainable approach to location and growth.

Major cross boundary and London-wide infrastructure is supported where appropriate, and Ealing's own needs are set out in the supporting Infrastructure Delivery Plan and supported by policy, where necessary.

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'?

LPA Response: London Plan Policy D3 relates specifically to development sites whereas SP4.1(D) is intended also to reflect broader issues of character that may be peculiar to the locality or town, and to reflect these in coordinating across different development sites. For this reason, the Council prefers language that links to the broader Character Study and analysis.

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?

LPA Response: Yes. SP4.2 (J) sets the overarching objectives acknowledging the town centre network hierarchy set out in the London Plan {EB13, Annex 1}. Detailed implementation plans are set out clearly in the Town Plans in Chapter 4. In each town plan, spatial strategy articulates how the borough wide spatial vision and spatial strategy are translated into a town specific policy that guides future development and investment within the area. In particular, this includes:

- Ealing Metropolitan Town Centre – {Policy E2} which is the commercial and employment hub of the borough
- Acton District Centre - (Policy A2} with an emphasis on mixed use development.
- Greenford District Centre – {Policy G2} with an emphasis on masterplan led, mixed use redevelopment.
- Hanwell District Centre – {Policy H2} which recognises the dual role of the District Centre and the transport hub at Hanwell Station.
- Southall Major Centre – {Policy S2} which proposes strengthening and diversifying the offer with renewed emphasis on a focus on employment-led growth.

These are further complemented by a number of town specific spatial policies that set out detailed policy related to specific areas within the town, including neighbourhood and local centres. Further development and investment opportunities are also identified within each place.

This whole approach is consistent with the Framework and the London Plan. In particular, London Plan Policy SD7 includes requirements which for example:

- Identify capacity for development, whether retail, residential or commercial. The Local Plan does this comprehensively through a range of individual site allocations.

- Address the town centres hierarchy. The Local Plan takes this fully into account and provides a local distinctive approach,
- Address local parades and edge of centre. The Local Plan do this particularly in relation to specific locations such as around Hanwell Station and Medway Parade in Perivale.

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 inventions?

LPA Response: Yes. 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 {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

Based on Ealing Council officer and member engagement and the findings from the IIA, a set of key messages helped shape the preferred spatial option {EB106, pp.42-43}. This included the concept of 'sustainable polycentrism' across the borough which would be supported through the delivery of 20-minute neighbourhood frameworks {EB108, EB109, EB112, EB113 and EB116}. The preferred spatial option utilises components of the three 'reasonable alternative' spatial options and builds upon the wider London Plan Spatial Framework.

The following key development principles underpin the Preferred Spatial Option {S1, Figure SS2}

- Delivering Growth Along Transport Corridors
- Focussing on 20-Minute Neighbourhoods
- Promoting Sustainable Connectivity

To deliver the preferred spatial option, a number of spatial interventions were identified {EB106, Chapters 4.3 and 4.4}. This is reflected in Policy SP1 which sets out an overall vision for Ealing which notes the unique characteristics and cultural identities of each of Ealing's seven towns and says they will be respected and enhanced through the application of locally sensitive Good Growth principles {S1, SP1 A}. It also says that growth in Ealing should be inclusive so that people can both contribute to and benefit from growth {SP1 B}. It also emphasises the promotion of 20-minute neighbourhoods {SP1 C}. In delivering the vision there are clear objectives which, for example, highlight making the best use of land and investing in sustainable connectivity and supporting the principles of 20-minute neighbourhood {Policy SP 2.2 B}. It also emphasises reducing spatial inequalities and creating a more equal and affordable borough {Policy SP 3.1}. It also promotes Good Growth, directs development to sustainable locations that are well connected to sustainable transport modes or within close proximity to town centres, and seeks to ensure the most efficient use of land so that development on sites is optimised and will contribute to more sustainable patterns of development and land uses {Policy SP4.1 A-C}.

Finally, Chapter 4 of the Local Plan presents town-level local place interventions within each of the town spatial policies that will support the delivery of the 15-year vision. These are aligned with the strategic place interventions in Chapter 3 including the Key Diagram {Figure SS3} and the conceptual diagram {Figure SS2}.

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?

LPA Response: Yes. National policy makes clear that local plans need to view the economic, social, and environmental needs of local areas as interdependent, should make effective use of land, and should meet identified needs. The London Plan sets some development targets directly, most notably the LPA housing target and provides other needs as benchmarks for further detailed work by boroughs, principally industrial needs. The London Plan's overarching objective is of a city that is inclusive, makes best use of land, is healthy, delivers the homes and jobs that Londoners need, and is more efficient and resilient.

Ealing local plan approach, which is embodied in the Spatial Strategy, is therefore based upon socially and geographically inclusive growth, that meets assessed housing needs (as established through the London Plan and supported by local evidence) and increases the number and quality of jobs and implements sustainable and resilient patterns of growth across the Borough's seven towns and which preserves and enhances its built and natural heritage.

Ealing's Spatial Strategy is consistent with the requirements of the national policy framework, it has been supported by evidence, and it is deliverable over the plan period. More generally, the question of conformity is also addressed in our response to Question 24 of Matter 1 and Questions 1, 12d, 14b, 14d of Matter 3.

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

LPA Response: No, other than the council's schedule of suggested minor modification {S24} which seek to make any corrections or provide better clarity arising mostly from either representations made at Regulation 19 or Statements of Common Ground with any prescribed bodies. As also noted in answer to Question 13 c) above, of particular relevance to Policy SP3 is SMM12 which refers to a separate schedule of minor modifications to ensure the Local Plan is now properly aligned with the Ealing Cycle Network Plan (S24a}.

{END}