

Ealing Local Plan

Matter 1 – Procedural and Legal Requirements

General conformity with the London Plan/ London Plan consistency

23. Overall, is the Plan in general conformity with the London Plan and how is that evidenced? Are any modifications necessary to address any inconformity?

No. The strategy is contrary to the Good Growth principle articulated in the London Plan, and the more detailed policies - GG2, H1 and H2 - which spell out in greater detail how this principle should be implemented in local plans and in decisions.

We do not intend to repeat our representations, but we consider that Chapter Three: Spatial Strategy, and the principles articulated in the Introduction, especially in paragraph 3.6, does not reflect fully the aim of the London Plan to support residential development in areas within 800m of a train or tube station or a town centre.

The Good Growth section of the London Plan says this at paragraphs 1.2.4 and 1.2.5:

1.2.4 Making the best use of land means directing growth towards the most accessible and well-connected places, making the most efficient use of the existing and future public transport, walking and cycling networks. Integrating land use and transport in this way is essential not only to achieving the Mayor's target for 80 per cent of all journeys to be made by walking, cycling and public transport, but also to creating vibrant and active places and ensuring a compact and well-functioning city.

1.2.5 All options for using the city's land more effectively will need to be explored as London's growth continues, including the redevelopment of brownfield sites and the intensification of existing places, including in outer London. New and enhanced transport links will play an important role in allowing this to happen, unlocking homes and jobs growth in new areas and ensuring that new developments are not planned around car use.

London Plan Policy GG2: Making the best use of land, Parts A and C also makes the point about intensifying the use of land for residential development near town centres and where well connected by public transport.

Policy H1 of the London Plan – Increasing Housing Supply – states, in B, Part 2, a) that residential development should be prioritised on, among other locations, sites “with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary.”

In the Strategic Place Interventions section of the plan, and Chapter Four, some locations are earmarked for only moderate levels of growth, despite enjoying excellent public transport connections. An example is locations and town centres like Hanwell and Perivale. The former has an Elizabeth Line Station (the business case for the Elizabeth Line was, in part, justified on the basis that it would facilitate greater residential development) and the latter a tube station.

Acton serves as another example. Figure A2: Acton Spatial Strategy illustrates the issue well. West Acton, Acton Town and Chiswick Park do not appear to have the London Plan's 800m radius delineated on the diagram, although Acton Main Line and South Acton appear to (although the London Plan says 800m from the boundary of the town centre). It is unclear from the local plan to what extent residential development would be supported around the

train / tube stations and town centres of these other areas. Policy A1: Acton Spatial Strategy is unclear.

It is important to recognise that the delivery of the London Plan housing requirement, especially the small sites element (12,000 dwellings a year), depends on the policies in the London Plan – GG2, H1 and H2 especially – to be translated in local plans. These policies are designed to allow for the ‘incremental densification’ (para. 4.2.4 of the London Plan) of existing residential areas, especially (but not exclusively so) those areas within PTALs 3-6 or within 800m of train / tube stations or town centre boundary.

Policy E1: Ealing Spatial Strategy is also very unclear on the extent to which, and where, residential development will be supported in this sub-area despite 13 tube and rail stations.

London is a single housing market area, and even if Ealing Council can maintain that it has an adequate housing land supply to meet its requirement, especially the London Plan requirement by 2028/29 (21,570 dwellings), the local plan needs to be positively worded to encourage as much supply as possible through the process of incremental densification to contribute to London’s overall housing need.

Last, the Council will be aware that London is failing to deliver its housing requirement to a significant degree. The last Government’s independent review of the London Plan – *London Plan Review: Report of Expert Advisers*, MHCLG, 15 January 2024 – found that housing delivery will need to increase from 52,300 dwellings per year to 62,300 dpa to meet the targets and address the backlog accumulated to date (para, 2.27).

The Ealing Local Plan needs to be revised to make clear that residential schemes in keeping with the policy parameters set by the London Plan – namely incremental densification in all areas especially in PTALS 3-6 or within 800m of train / tube stations and town centre boundaries – will be encouraged and considered favourably.

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