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Mr D. McCreery and Ms C Dillon,
The Planning Inspectorate
c/o Paige Gaughan,
Local Plan Programme Officer,
Ealing LPA

Your ref

My ref
CR/012

Extension
8056

Date
25th July 2025

Dear Sir/Madam,

**Examination of the Ealing Local Plan 2024-2039:
Ealing LPA's Response to Post Hearing Advice
Arising From The Block 1 Hearing Sessions**

Thank you for your letter, dated 3rd July 2025, which followed the conclusion of the Block 1 Hearing Sessions held between June 16th and 19th 2025. Apologies for the delay in responding but in view of the matters raised I wanted to ensure that we had given very careful consideration to each of the points made and could make a proper assessment of the scope and resources required to undertake the additional work now required.

Issue 1: Duty to Co-operate (the Duty) -

The following further evidence of meeting the Duty to Cooperate will be provided:

- An addendum to the Revised Duty to Cooperate Statement, November 2024 {S22} to include the strategic cross boundary matters that were considered when drafting the Local Plan, and an explanatory note on the relationship between the GLA and London Boroughs in terms of the Duty to Cooperate.
- A statement on all cross boundary strategic issues demonstrating active and ongoing engagement with neighbouring boroughs and how discussions have shaped the Local Plan, including relevant minutes and agendas from West London Alliance meetings, bilateral meetings with neighbouring boroughs, and meetings with Statutory Bodies.

- Statements of Common Ground with neighbouring boroughs and Statutory Bodies including earlier versions to demonstrate active cooperation and how these have shaped the Local Plan.

It is anticipated that all of this work will be completed by the end of second week of September 2025.

Issue 2: Infrastructure -

Regarding infrastructure delivery, having reviewed the Infrastructure Delivery Plan (EB83-84} the council agrees that it is not currently structured in a way that enables a proper understanding of the infrastructure constraints upon site delivery. We will therefore produce a new supplementary report which divides infrastructure as follows:

- Contingent infrastructure that is necessary to deliver specific sites.
- Supporting infrastructure that will be required of schemes on specific sites.
- Strategic infrastructure for which the council or the plan has a delivery role but does not constrain individual site delivery.
- Strategic infrastructure for which the council or the plan has a coordinating or informative role but does not constrain individual site delivery.

We will also provide as much detail as possible on those projects currently categorised as "TBC" or requiring feasibility studies through updates from infrastructure providers, setting out the implications on both housing supply and the plan as a whole. We are confident that this work will show that the plan's proposals can be delivered in accordance with the housing trajectory.

It is anticipated that all of this work will be completed by mid-late September 2025.

Regarding the strategic road network, a technical note that provides an impact assessment has now been successfully completed. This will be shared with National Highways next week together with a draft SoCG. A further meeting with National Highways is in the pipeline.

It is anticipated that all of this this work will be completed by mid-September 2025, at the latest.

Issue 3: Housing Land Supply -

The council are exploring a number of options around how best to satisfy the requirement to identify a supply of deliverable sites sufficient to provide a minimum of five years' worth of housing against our

housing requirement. Reflecting the source of the target, initial discussions have already taken place with colleagues at the GLA, and these discussions will continue as we finalise our proposed approach.

The intention is to document our suggested approach as part of a paper. This paper will also summarise other options considered. As well as setting out our rationale and justification for the approach, and demonstrating consistency with national and regional policy, this will also set out any suggested changes to the policy and supporting text, if required.

It is anticipated that this work will be completed by the end of September 2025.

Issue 4: Gypsies and Travellers -

We accept that the figures used in the Reg 19 Local Plan in relation to the future housing needs of the Gypsy and Traveller community are based on the narrow definition of Gypsies and Travellers. However, it should be noted that the Plan's existing evidence base, the West London Alliance GTAA 2018 {EB80} does include an accommodation needs assessment figure derived from a wider definition of Gypsies and Travellers. This is because that study also took account of the then draft London Plan's wider definition which is consistent with the revised PPTS. In addition to the 6 pitches identified in the plan, a further 23 are identified if that wider definition is applied.

To address this matter and demonstrate that the Plan is positively prepared, justified and effective, we are exploring the following actions:

- Provide suggested modifications to ensure need based on the wider definition is included in the Plan.
- Work with the GLA to understand when the findings of the joint London-wide review of Gypsy and Traveller needs will be published noting that this work is currently in draft, embargoed and will in time be published by the Mayor of London to support the on-going Review of the emerging London Plan. A draft version of the New London Plan is not expected to be published until sometime in 2026.
- Propose a new policy that will enable windfall sites for Gypsy and Traveller accommodation to come forward over the plan period. Our initial thinking is that a permissive policy enabling grey belt sites to come forward to facilitate Gypsy and Traveller site provision is the appropriate way forward.
- It should be noted that the London Borough of Ealing has one existing Gypsy and Traveller site, and this actually sits outside of Ealing's LPA area, with the OPDC as the LPA. Therefore, we will work with OPDC to set out how both LPAs will work together to address Gypsy and Traveller accommodation needs in the borough and each LPA.

It is anticipated that this work will be completed by mid-October 2025.

Issue 5: Strategic Policies -

We accept that the treatment of strategic policies in the Reg 19 Local Plan could be much clearer, and, with hindsight, the choice of nomenclature has the potential to cause some confusion.

Notwithstanding this, the council still believes the content of the policies in the plan are 'strategic' at least for the purposes of neighbourhood planning but will undertake to review this and provide a more effective and nuanced approach by way of a further suggested modification.

It is helpful that Policies SP1 to SP4 are acknowledged as being strategic and we will provide an explanation for those other policies in the plan which can be justified in the same vein.

Our initial view is that the following policies should also be considered strategic:

- The spatial strategies for each of the seven town plans.
- Policy E2 in the Ealing Town Plan which covers the Ealing Metropolitan Town Centre because of its significance as the primary centre of the borough and its scope for significant levels of development in the future.
- The site allocations in terms of their significance in delivering a range of metrics, notably housing supply. However, a more nuanced approach could be included that allows scope for the shaping of any design proposals within the parameters of the high-level design principles that are set out in the plan.
- All of the policies in Chapter 5 which mainly owe their provenance to the London Plan which provides the spatial development strategy for the capital. Indeed, legislation stipulates that the London Plan should only deal with things of strategic importance to Greater London.

It is anticipated that this work will be completed by mid-August 2025.

Issue 6: Policy E3 Affordable workspace -

Noted.

In view of the additional work required, the potential need for the work to be shared a month in advance of hearings and because of prebooked holiday of key members of the team over the summer period the council believes that it will be necessary to reschedule the Block 2 hearing sessions currently planned for the period September 9th to 18th 2025. Based on the above proposals (and including the separate work required under the Action Logs provided under separate cover), it is council's intentions that all of this work will be fully undertaken and completed by mid-October 2025 with the review of resuming the hearings sessions as soon as possible. Early confirmation of the revised hearing sessions timetable would therefore be much appreciated.

Yours sincerely

Steve Barton

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