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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	Extension	Date
	CR/013	**8056**	**7th August 2025**

Dear Sir/Madam,

Examination of the Ealing Local Plan 2024-2039:
Ealing LPA's Response to Post Hearing Advice -
Issue 5: Strategic Policies

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. Below I set out the Council's response to Issue 5 which deals with Strategic Policies. I promised to respond by mid-August 2025.

You have raised two main concerns relating to a lack of clarity regarding the treatment of strategic policies requiring a potential suggested modification and that the approach we have taken is not consistent with Paragraph 21 of the NPPF requiring either justification or a more nuanced approach. I shall deal with each point in turn.

1. Lack of Clarity

1.1 The Council accepts that the treatment of Strategic Policies in the Reg 19 Local Plan could be much clearer, and with hindsight, the choice of nomenclature for the numbering of policies has the potential to cause some confusion.

1.2 The Reg 19 Local Plan makes reference to Strategic Policies in Chapter One but solely in relation to neighbourhood planning. Specifically, it says:

> *"Neighbourhood plans are community-led and must meet certain basic conditions and be in conformity with the strategic policies in the Local Plan. They are also an integral part of the statutory local development plan. Two neighbourhood plans have been developed within the borough, Central Ealing (adopted 19*

December 2017) and West Ealing (adopted 12 June 2018). Two further plans are in the initial stages of production for Central Acton and Acton Hill.

"For the purposes of neighbourhood planning, all the policies in Ealing's Local Plan are considered to be strategic policies." {S1; Chapter One; Para 120-121}

1.3 This view was based on the Council's experience of the treatment of two Neighbourhood Plans (made in 2017 and 2018) in examination where this view was successfully upheld.

1.4 It is proposed that Chapter One be modified both to provide better clarity and also deal with the issue of potential inconsistency with the NPPF Paragraph 21. The suggested Modification is attached at Appendix 1 of this letter.

2. Inconsistency with NPPF Paragraph 21

2.1 The Council acknowledges that Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004 requires LPAs to identify the strategic priorities for the development and use of land in the authority's area.

2.2 The National Planning Policy Framework elaborates on this legislative requirement, making clear that Local Plans should explicitly identify 'strategic' policies, and clearly distinguish them from other policies which are considered 'non-strategic'.

2.3 Specifically:

"Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for:

a) housing (including affordable housing), employment, retail, leisure and other commercial development;
b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
c) community facilities (such as health, education and cultural infrastructure); and
d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation." {EB10; NPPF, Para 20).

2.4 PPG elaborates further on the role of strategic policies:

"A plan's vision and objectives can be used to set out the types of place(s) which the plan aims to achieve, how this will contribute to the sustainable development of the area and how this translates into the expectations for development and investment, including design.

Where a plan contains strategic policies, they can be used to set out these design expectations at a broad level – for example in relation to the future character and role of town centres, areas requiring regeneration or suburban areas facing more incremental change. Strategic policies can also be used to set key design requirements for strategic site allocations and explain how future masterplanning and design work is expected to be taken forward for these sites." {EB11; PPG; Paragraph: 003 Reference ID: 26-003-20191001; Revision date: 01 10 2019}

2.5 By way of contrast:

"Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development." {EB10; NPPF, Para 28).

2.6 Again, PPG provides further elaboration:

"Non-strategic policies can be used to establish more local and/or detailed design principles for an area, including design requirements for site specific allocations. They can be prepared by local planning authorities or neighbourhood planning groups, and are most effective when based on appropriate evidence of the defining characteristics of the area, such as its historic, landscape and townscape character.

Non-strategic policies are important for providing a clear indication of the types of development that will be allowed in an area, especially where they provide a hook for more detailed local design guides, masterplans or codes." {EB11; PPG; Paragraph: 004 Reference ID: 26-004-20191001; Revision date: 01 10 2019}.

2.7 Whilst Para 121 of the Reg 19 Local Plan {S1} currently states that all of the policies in Ealing's Local Plan are considered to be strategic policies, you have argued that:

"in principle national policy does not appear to support the Council's blanket approach. An argument that all the policies collectively and equally address strategic priorities is generic. If applied to all plans across the country, this line of thinking would rob Paragraph 21 and the broader exercise of making a distinction

between strategic and non-strategic policies of significant utility. As such, the Council's approach is not adequately justified."

2.8 It is therefore recommended that the Council should consider a more nuanced approach to the scope of strategic policies. The starting point for that is your acceptance that Policies SP1 to SP4 are strategic but that the addition of any other policies should be specifically justified.

2.9 Whilst the Council considers the content of the policies in the plan are 'strategic' at least for the purposes of neighbourhood planning we undertook to review this and provide a more effective and nuanced approach by way of a further suggested modification.

2.10 A suggested modification is proposed to deal with the issue of potential inconsistency with the NPPF Paragraph 21 and provide better clarity. This is attached at Appendix 1 of this letter.

2.11 The table sets out those policies that the Council contends are genuinely strategic and seeks to justify the approach we have taken:

Chapter	Policy	Justification
3	Policies SP1-SP4	These policies are already acknowledged as being strategic. They are closely aligned to the strategic vision and key priorities that are outlined in Ealing Council's Council Plan 2022-26 {EB66}. 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.
4	Policies A1, E1, G1, H1, N1, P1 and S1	The Town Plans aim to optimise the role and responsibility of each of the seven towns, ensuring they all contribute to the future prosperity of the borough and are integrated within the borough-wide spatial strategy (set out in Chapter 3). A town spatial strategy is established that articulates the borough-wide spatial vision and spatial strategy into a town-specific

Chapter	Policy	Justification
		policy that will help guide future development and investment within the borough.
4	Policy E2	Policy E2 covers the Ealing Metropolitan Town Centre and is strategic because of its significance as the primary centre of the borough and its scope for significant levels of development in the future. Of the individual town spatial policies, it is therefore unique because of the Centre's scope, size and significance. It is the only Metropolitan Town Centre in the borough which by definition serves catchments which can extend over several boroughs. These centres generally have very good accessibility and significant employment, service and leisure functions. Many, such as Ealing, have important clusters of civic, public and historic buildings {EB13, Annex 1}.
4	Development Sites (or Site Allocations)	Development Sites will be critical to the delivery of the spatial strategy and help address Ealing's objectively assessed needs e.g. housing. The NPPF states that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (EB10; Para.23} and planning policies should set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period {EB10; Para 86 b}. It is therefore essential that any future development proposals make the best use of the land and also support broader thematic policies set out in the plan including any mix of land uses and, where appropriate, take into any indicative capacities.

Chapter	Policy	Justification
		However, it should be noted that the design principles under each Development Site set out broad, high-level objectives that seek to avoid prescribing in detail the actual form of development (except where there is an extant planning permission or an agreed masterplan).
5	Policies D9, H16, E3, E4, E6, G4, G5, G6, S5 and SI 7	These policies all owe their provenance to the London Plan {EB13} which provides the spatial development strategy for the capital and provide either necessary clarification or variation to ensure effective implementation of the parent policy. Legislation stipulates that the London Plan should only deal with things of strategic importance to Greater London and this remit is reinforced by the NPPF {EB10, Para 17}.
5	Policies OEP and ECP	These policies build on London Plan Policy SI 2 (Minimising Greenhouse Gases) and operate within a suite of policies which aim to re-define what qualifies as zero-carbon developments in Ealing, and drive development which is genuinely net zero. They also give practical effect to the objectives set out in Policy SP 2 which deals with tackling the climate crisis and specifically Policy SP 2.2 D in the plan which supports the delivery of net zero carbon buildings. Policy OEP is also based on a shared evidence base developed in tandem with the Mayor of London and 17 other London boroughs. It is therefore important that a strategic, consistent and effective approach is taken across all development within the borough.
5	Policy WLC	This policy builds upon London Plan Policy SI 7 (Reducing Waste and Supporting the Circular Economy) and the existing requirement to undertake Whole Life Cycle Assessments for referrable schemes (which has been operational since 2021). The policy extends the scope of this policy to major developments as well. The policy also gives practical effect to the objectives set out in Policy SP 2 which deals

Chapter	Policy	Justification
		with tackling the climate crisis and specifically Policy SP 2.2 C in the plan which promotes managing waste and promoting self-sufficiency, in particular, by supporting circular economy principles. It is therefore important that a strategic, consistent and effective approach is taken across all development within the borough. It is acknowledged that Policy WLC essentially forms a local variation to London Plan Policy SI 2, expanding Clause F of that policy. Consideration was initially given to drafting this policy as a local variation; however, Policy SI 2 is already a lengthy policy with a wide scope. For the sake of clarity and effectiveness, it was felt that it was easier to express these local requirements as a standalone local policy.
5	Policies DAA, HOU, SSC and ENA	These are all considered to be delivery policies, that are necessary to ensure the strategic objectives of the plan are delivered by development proposals. Policy HOU and SSC set out the delivery mechanism and contribution levels for affordable housing provision in the borough and are directly related both to the needs and viability assessment which underpin the plan. In the case of Policies DAA and ENA, it is important to have a common approach to assessing design and amenity impacts and the appropriate circumstances for enabling development. The approaches set out are contextual and based upon the specific circumstances of a given site, so it is difficult to see that further flexibility is necessary or practicable.

Yours sincerely

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APPENDIX 1: SUGGESTED MODIFICATION

To insert new paragraphs after existing Paragraph 1.19 in Chapter One {S1} and revise existing Paragraphs 1.19 and 1.20 as follows:

"Strategic and non-strategic policies

1.20 Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004 requires LPAs to identify the strategic priorities for the development and use of land in the authority's area. The National Planning Policy Framework elaborates on this legislative requirement, making clear that Local Plans should identify strategic policies, clearly distinguishing from other policies which are considered non-strategic.

1.21 Strategic policies are those policies which address the strategic priorities of the area and any relevant cross-boundary issues. They include an overall strategy for the pattern, scale and quality of development including housing and employment uses.

1.22 Non-strategic policies deal with more localised issues and should be used to set out more detailed policies for specific areas or neighbourhoods or types of development.

1.23 For the avoidance of doubt, all policies in the Plan have full statutory weight.

1.24 Table 1 sets out the strategic and non-strategic policies in the plan:

List of strategic and Non-Strategic Policies		
Chapter	**Strategic Policy**	**Non-Strategic Policy**
3	Policies SP1-SP4	
4	Policies A1, E1, E2, G1, H1, N1, P1, S1 and the Development Sites (or Site Allocations)	Policies A2, A3, A4, A5, A6, E3, E4, G2, G3, G4, G5, G6, H2, N2, N3, N4, P2, P3, P4, P5, S2, S3, S4 and S5
5	Policies DAA, D9, HOU, H16, SSC, E3, E4, E6, G4, G5, G6, S5, OEP, ECP, WLC, SI 7 and ENA	Policy FLP

Neighbourhood planning framework

1.25 ~~1.20~~ Neighbourhood plans are community-led and must meet certain basic conditions and be in conformity with the strategic policies in the Local Plan. They are also an integral part of the statutory local development plan. Two neighbourhood plans have been developed within the borough, Central Ealing (adopted 19 December 2017) and West Ealing (adopted 12 June 2018). Two further plans are in the initial stages of production for Central Acton and Acton Hill.

1.26 ~~1.21~~ For the purposes of neighbourhood planning, **only those policies specified in Table 1** ~~in Ealing's Local Plan~~ are considered to be strategic policies. **Whilst this list does include the individual Development Sites (or Site Allocations), it should be noted that the design principles under each Development Site set out broad, high-level objectives that seek to avoid prescribing in detail the actual form of development (except where there is an extant planning permission or an agreed masterplan). This leaves appropriate scope for more detailed design and masterplanning work through neighbourhood planning."**