

Ealing LPA Local Plan (Regulation 24) 2025

Matter 8: Town Plans

Issue:

[Focus – all Town Plans]

Whether the Town Plans are 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

Town Plan Visions and Spatial Strategies

- 1. For each Town, are the issues to address and opportunities set out in the plan based on a sound understanding of each place and clearly articulated?**

LPA Response: Yes. Each town has a strong local identity, unique character, and set of priorities and opportunities. The Local Plan aims to maximise 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). Each Town Plan therefore sets out the existing context of that town, including key issues and opportunities that have been identified through the evidence base. This included a number of thematic studies together with a series of regeneration and 20-minute frameworks for each of Ealing's seven towns {EB107-119}. This also reflected what local people told us through Shaping Ealing {EB22-24}. This online survey launched on the 10th November 2021 and closed on the 9th May 2022 and gathered 10,661 responses. The online survey was also complimented by some in person events.

- 2. Will the Spatial Strategy and policies for each Town be effective in addressing the issues and capitalising on the opportunities of each place in a way that supports the delivery of sustainable development, clearly setting out deliverable planning related policy expectations and/ or proposals in a manner which gives certainty in future decision taking in the Borough?**

LPA Response: Yes. A town spatial strategy is established that articulates the borough-wide spatial vision and spatial strategy into a town-specific policy that will help guide future development and investment within the borough. The town spatial strategy is supported by a series of town specific spatial policies that set out detailed policy related to specific areas of focus within that town. Further investment and development opportunities are also identified within each town. To provide more granular detail, each of the Town Plans include the Development Sites (or site allocations) that will be critical to the delivery of the spatial strategy and help address Ealing's need for new genuinely affordable homes and employment space and any necessary physical, social, and green infrastructure.

- 3. Is each Town Plan Spatial Strategy aligned with Policies SP1 to SP4 and, for effectiveness, do the policies in the Plan support their delivery? Is the purpose and scope for each policy sitting within the Town Plan Spatial Strategy justified?**

LPA Response: Yes. In addition to the response provided at Q2 above, the Council Plan {EB66} identified three cross cutting strategic objectives. These are tackling the climate crisis, fighting inequality, and creating good jobs and growth. Each of these strategic objectives 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 town-scale plans

which includes an overall spatial vision for each town, reflecting on spatial strategy and the strategic place interventions identified in Chapter 3. To further reinforce this, each of the three strategic objectives are also sub-headings within the spatial strategy for each town and provide a 'golden thread' between Chapter 2 (the Council Plan), Chapter 3 (the Spatial Strategy and Chapter 4 (Town Plans). In so doing, policies in Chapter 4 also aim to provide a locally distinctive and relevant planning policy framework for each town within the overall borough wide spatial policy context.

4. Are the key Infrastructure Delivery Schedules for each Town justified by and consistent with the evidence base, including where critical infrastructure is needed to support the delivery of individual allocations?

LPA Response: The Infrastructure Delivery Plan {EB83} and associated delivery schedules {EB84} were 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. Ealing's Regulation 19 Local Plan refers to 'key' rather than 'critical' infrastructure demonstrating that any impact is more about achieving successful development outcomes. In the vast majority of cases, individual site allocations will be expected to make contributions to wider infrastructure requirements but not to bear the whole cost, and this will largely be through tariffs set by the new Community Infrastructure Levy. Where mitigation measures are required, for example, to provide local highways improvements, this will continue to be collected through S106.

However, the IDP does not currently distinguish where site delivery is contingent upon infrastructure which is the financial responsibility of development and/or which falls within Ealing LPA. As requested at EiP hearings, the Council is preparing an analysis of contingent infrastructure and further updating the infrastructure list for clarity and progress.

5. Are the boundaries of all town centres clearly defined, including any proposed alterations? Where alterations are proposed are they supported by evidence in development capacity assessments and town centre health checks and subject to assessments of retail impact? Taken as a whole, is the Plan clear about the applicable policies that will apply in different centres?

LPA Response: Yes, the town centre boundaries are set out on the Interactive Policies Map {S18} and there are no proposed changes from the adopted local plan. Most policies that are specific to one or other centre are set out in the relevant town chapter, and where this is not the case the relevant centre has been identified in the policy.

6. What is the latest position on the preparation of the Ealing Metropolitan Town Centre Growth Strategy [EB57], and does it have any implications for the Spatial Strategy or individual policies in the Plan?

LPA Response: The Strategy will be made available as soon as possible. There are no implications for the Spatial Strategy beyond those which are already accounted for in the plan.

The Strategy sets out that there is a divergence between what modelling would tell us about office space growth needs and monitoring data which shows a decline in overall provision. It

recommends that existing sites be retained and redeveloped for mixed use including office provision and sets out a framework to promote and assess this type of application. This is particularly relevant to allocated sites in Ealing Metropolitan Town Centre.

7. For deliverability, are the town-based Spatial Strategies built on an appropriate understanding of where public realm/space interventions are reliant on development finance or general spending unrelated to development management activities?

LPA Response: Yes, public realm interventions are identified in specific site allocations where these are intended to be delivered by that development. In most cases, however, such as the broader interventions in Acton District Centre will result from pooled contributions or by fundraising.

8. Are each of the town-based Spatial Strategies aligned in respect of articulating and promoting the existing and proposed cycle network, other strategic routes and local and green links across the Borough?

LPA Response: Yes. Each of the Spatial Strategies refers to cycling improvements at a high level, e.g. articulating the need to improve north-south connections in Greenford. It is proposed that each of the Spatial Strategy figures (e.g. Figure G2) be amended to align with the Cycle Network Plan, which was approved by Cabinet in January 2025, as proposed in the Schedule of Suggested Modifications. The modifications are proposed to include replacing the original 'primary and secondary active travel routes' classification shown in the Spatial Strategy figures, with the cycle routes identified in the Cycle Network Plan.

9. Are the instances where open space is proposed to be protected clear, both in terms of the identification of such sites and the policy mechanism for protecting them?

LPA Response: Yes. The protection of green and open spaces is a given and addressed through other policy frameworks and local DM policies, and therefore it is not explicitly covered in Chapter 4/Town Plans. Instead, the key policies are:

Regarding the NPPF:

- Section 8 (para. 103, 106) – protecting open space and sports facilities
- Section 13 (paras 152-156) – protecting green belt
- Section 15 (para. 185) – protecting sites of biodiversity or geological value

Regarding the London Plan:

- Policy S5c (Sports Facilities).
- Policy S7 (Burial Space).
- Policy G1A (Green Infrastructure).
- Policy G2 (Green Belt)
- Policy G3 (Metropolitan Open Land)
- Policy G4B (Open Space)
- Policy G6A (Biodiversity)
- Policy G8 (Allotments)
- Policy G9B (Geodiversity)

- Policy SI 17 (waterways)

Regarding Ealing's Local Plan:

- Local Variation Policy G4 (open space)
- Local Variation Policy S5 (sports facilities)

Acton Town Plan

10. In terms of Policy A1:

- a. is the stated moderate level of growth along key north-south corridors of Acton justified?**

LPA Response: Yes. The strategic context, relevant evidence base and justification for the proposed strategic interventions is outlined in the response to a question in Matter 3, Q14 e). The delivery of moderate levels of development along key north-south corridors in Acton forms one of the strategic interventions and is based on the premise of delivering enhanced north-south connectivity across the borough through rail-based public transport investment in the West London Orbital (particularly at Acton Central Station and South Acton Station). It also seeks to take advantage of the close geographical proximity of the proposed HS2 station at Old Oak Common and provide enhanced connectivity to this new station. This will enable Acton to capitalise on its excellent existing and future connectivity to accommodate moderate levels of development along the route alignments. This is an appropriate strategy based on the evidence and consideration of reasonable alternatives and is therefore considered to be justified.

- b. does Figure A1 clearly distinguish the OPDC area from other Opportunity Areas?**

LPA Response: No. It is suggested that amendments to cartography including Figure A1 are made to distinguish more clearly the OPDC area as proposed in the Schedule of Suggested Modifications {S24 - reference SMM33}. A separate reference in the key could also be made for other opportunity areas (notably the White City Opportunity Area in neighbouring Hammersmith and Fulham) or this could be removed entirely. The map is intended to show strategic context, and it is helpful to show some prominent features beyond the borough boundary.

- c. are modifications required so that the rail routes in Figure A2 are accurately depicted?**

LPA Response: Yes. It is suggested that amendments to cartography for Figure A2 are made to more accurately depict rail routes as proposed in the Schedule of Suggested Modifications {S24 - reference SMM35}. These include adding the WLO route to the map and showing the London Overground as an orange line. It also involves corrections to the key to show the correct colour for Elizabeth Line.

- d. does clause k (iii) adequately address the health infrastructure of the Acton Town**

Plan area?

LPA Response: No. It is suggested that an amendment to Clause L (iii) in Policy A1 is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM40}. It expands the range of health infrastructure impacted by population growth. For clarity, please note the affected clause is L not K suggested in the question.

e. is clause l (iv) appropriate in instances where land is required for operational or development purpose by the transport operator?

LPA Response: No. It is suggested that an amendment to Clause I (iv) in Policy A1 is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM39}. This seeks to exempt land that is required for operational or development purposes.

f. are modifications required to ensure consistency between the policy, supporting text and London Plan regarding the ELP's approach to intensification of use and co-location of housing and light industrial uses in Local Significant Industrial Sites?

LPA Response: No, modifications to this policy are not considered necessary although changes to the thematic policies on employment are recommended as part of the Ealing/GLA Statement of Common Ground {S22 d}.

g. does Table A1 identify all relevant infrastructure providers?

LPA Response: No. It is suggested that amendments to Table A1 are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM41}. This seeks to clarify the infrastructure providers for the North Acton Gyratory project. It also stresses the importance of maintaining active travel connectivity along Bollo Lane for West London Orbital.

h. are any modifications needed to Policy A1 for soundness?

LPA Response: No, with the exception of amendments to Clauses G, I and L as proposed in the Schedule of Suggested Modifications {S24 - reference SMM38-SMM40} which provide better clarity.

11. In terms of Policy A2:

a. will the policy be effective in addressing the 'At Risk' status of the Acton Town Centre Conservation Area?

LPA Response: Ealing's Review of Conservation Areas [EB47] p18 recommends that the trend for Acton Town Centre CA be updated from 'deteriorating' to 'stable' and this reflects the improvements which have already taken place under the adopted local plan. Areas of risk in this CA primarily reflect the quality of the townscape/streetscape which ties together the otherwise archipelagic area, and which have seen considerable improvement through recent development. The CA is also substantially affected by the current adverse character

of development on Acton Gateway 01AC, and the redevelopment of the site according to the design principles set out in this allocation will greatly improve the setting and character of the area. Overall, and other than the transformative change planned for 01AC, the strategy is for incremental improvement appropriate to a CA, and in line with the Plan's contextual approach to overall change.

b. are any modifications needed to Policy A2 for soundness?

LPA Response: No.

12. In terms of Policy A3:

a. is the approach to co-location opportunities at South Acton LSIS in general conformity with the London Plan and is there sufficient clarity and consistency on this matter between the policy wording and the supporting text?

LPA Response: The approach to co-location is in general conformity with the London Plan. However, effectiveness could be improved by clarifying Para 4.1.40 as follows:

“(ii) The changing character of the South Acton LSIS areas is properly managed and that through good design the boundary ~~relationship~~ between **designated** LSIS and surrounding residential land is ~~softened and blended and public realm improved.~~”

b. are the parameters for tall buildings in this Town consistent with the submitted evidence base?

LPA Response: Yes.

c. are any modifications needed to Policy A3 for soundness?

LPA Response: No.

13. In terms of Policy A4:

a. is clause (iv) justified and effective?

LPA Response: No. It is suggested that amendments to Clause A (v) are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM42}. This seeks to clarify that Friars Place Green, Friars Gardens, and St Dunstons Gardens are to be designated as Local Green Spaces and specify the types of improvements that are being sought.

b. are any modifications needed to Policy A4 for soundness?

LPA Response: No, other than that specified in answer to Q.13 a above.

14. In terms of Policy A5:

- a. **are any modifications needed to Policy A5 for soundness?**

LPA Response: No.

15. In terms of Policy A6:

- a. **does it take adequate account of the respective jurisdiction and responsibilities of the Borough Council and the Old Oak and Park Royal Development Corporation and the implications of HS2 proposals?**

LPA Response: No. It is suggested that amendments to the title of the policy and its preamble are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM43}. This seeks to clarify that the policy does not seek jurisdiction over the geography of the OPDC which is separate LPA for plan making proposes and clarifies that the scope of the policy is about more effective cross boundary collaboration with the OPDC and other relevant stakeholders.

- b. **are any modifications needed to Policy A6 for soundness?**

LPA Response: No, with the exception of amendments as proposed in the Schedule of Suggested Modifications {S24 - reference SMM43-SMM45} which seek to provide better clarity.

Ealing Town Plan

16. In terms of Policy E1:

- a. **is the Vision and Spatial Strategy for Ealing effective in terms of its clarity and content?**

LPA Response: Yes. The strategy sets out where existing strengths, such as the built character and integrated uses of the town centre, should be strengthened and improved, and where significant problems need to be addressed, such as affordability.

- b. **has the potential for cumulative effects of the Vision and Spatial Strategy been considered and if so, what was the outcome?**

LPA Response: Yes. The strategy is based upon plans for the cumulative improvement and strengthening of Ealing. Most of the strengths and opportunities of Ealing, and particularly the town centre, are based upon network and agglomeration effects, such as the accessibility afforded by Ealing Broadway.

- c. **has consideration of any sewerage and water supply constraints in the area informed the content of Table E1?**

LPA Response: Yes. Sewerage and water supply in Ealing town are both met by Thames Water. Anticipated demand is expected to require upgrades to Thames Water's network; however, water supply and treatment is furnished by facilities that lie outside of the borough and are subject to broader plans at a sub regional or London-wide level. At this stage Thames Water has not identified specific upgrades within healing that need to be directly facilitated by development or safeguarded in the plan.

d. is the approach to bus stopping and standing arrangements effective?

LPA Response: There is not yet a finalised approach to rationalising bus stopping and standing arrangements for Ealing Town Centre; rather the Plan reflects the position of agreement between LBE and TfL that there is a need to undertake this rationalisation and that it will take place in appropriate phases. The approach will consider factors including alterations to bus routes – for example, the proposed introduction of the SL13 route, part of the Superloop, which would run from Hendon to Ealing Broadway. The stopping arrangements for this route, as with existing routes, are subject to further consultation and discussion.

e. are any modifications needed to Policy E1 for soundness?

LPA Response: No.

17. In terms of Policy E2:

a. is the policy approach based upon up-to-date evidence relating to the health and opportunities for this town centre?

LPA Response: Yes, the Town Centre Health Check {EB53}, Inclusive Economy baseline {EB50}, and forthcoming EMTC Growth Strategy are all up to date, reflecting post-Covid growth and trends. Retail needs assessments EB59 and EB60 are older, however, the strategy that is set out reflects the more limited role assigned to the planning system in the management of retail space. Further, the broad trends that they identify remain operative, for example, the food and beverage driven growth and population driven regeneration of Ealing Metropolitan town Centre.

b. is the strategy for the Town Centre sufficiently clear?

LPA Response: Yes.

c. is the response to the role and character of the Town Centre and identified opportunities for social and economic regeneration, growth, transport and permeability clear, coherent and justified?

LPA Response: Yes, Ealing Metropolitan Town Centre is the most important cultural, transport, employment, and commercial centre in the borough, and this is made clear by the policy, and the rest of the Town Plan. In many cases these roles complement each other, but

the policy, along with E1, clearly expresses the importance of Ealing's existing built character and heritage.

- d. **will the policy approach be effective in delivering the 'office corridor' and positively contributing to the vitality and viability of the Town Centre?**

LPA Response: This is largely dependent on the delivery of individual site allocations. However, the strategic policy provides both a clear lead and a consistent approach to doing so.

- e. **are any modifications needed to Policy E2 for soundness?**

LPA Response: No.

18. In terms of Policy E3:

- a. **Is the term 'character-led growth and intensification' in an Ealing context clearly articulated?**

LPA Response: Yes, the character of the area is expanded upon in the supporting wording, and also in character evidence {EB42-45A&B}. Policy DAA provides a framework for the management of individual applications.

- b. **are any modifications needed to Policy E3 for soundness?**

LPA Response: No

19. In terms of Policy E4:

- a. **Is the term 'character-led growth' in an Ealing context clearly articulated?**

LPA Response: Yes, the character of the area is expanded upon in the supporting wording, and also in character evidence {EB42-45A&B}. Policy DAA provides a framework for the management of individual applications.

- b. **are any modifications needed to Policy E4 for soundness?**

LPA Response: No.

Greenford Town Plan

20. In terms of Policy G1:

- a. **is the proposed level of growth for the area correctly cited?**

LPA Response: No. It is suggested that an amendment to the proposed level of growth in

Clause A is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM80}. This seeks to clarify that the levels of growth are 'significant' in line with the strategic interventions outlined in the Spatial Strategy (Chapter 3) and the evidence base {EB106}.

b. does Figure G2 accurately denote the land use status of Greenford Quay as a SIL?

LPA Response: No. Figure G2 shows the current boundaries of SIL designations, which in the case of Greenford Quay includes a small parcel of the land south of the canal. The Interactive Policies Map (S18) illustrates that it is proposed that this parcel of land is to be removed from SIL designation. This reflects the reality on the ground with the completion of a residential led development on this site. It is therefore suggested that a cartographic amendment is made to Figure G2.

c. to be effective, should specific reference be made to SILs?

LPA Response: No. Clause D of Policy G1 refers to Greenford's industrial estates and for these to be intensified, enhanced and improved and reference is also made to Policy G6 which provides a specific policy on Greenford's industrial estates. Further and specific references to SIL are also made in the supporting text at paragraphs 4.3.49, 4.3.50, and 4.3.51.

d. is the intensification of employment sites a justified and effective approach for the Town?

LPA Response: Yes. Given the scarcity of available land in combination with the need to deliver additional housing and social infrastructure, and the economic benefits of the clustering of economic activity, industrial intensification that builds and expands on Greenford's successful industrial locations is the most effective approach for the town.

e. does it adequately address the varied needs of businesses in terms of unit sizes and accessibility?

LPA Response: No. It is suggested that amendments to the varied needs of businesses in terms of unit sizes and accessibility in Clause L (ii) and (iii) are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM81}. These clarify that the supply of employment land and premises should meet the needs of a wide range of businesses and unit sizes (from small start-ups looking for affordable premises to large, well-established businesses) and should be in accessible locations.

f. is the content of Figure G1 accurate?

LPA Response: No. It is suggested that an amendment to Figure G1 is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM79}. This corrects an error where Sudbury Town Station is incorrectly labelled as Sudbury and Harrow Road.

g. is it consistent with Policy G4 in terms of improvements to the access to the canal/GUC Cycleway?

LPA Response: Yes.

h. are any modifications needed to Policy G1 for soundness?

LPA Response: No, with the exception of amendments as proposed in the Schedule of Suggested Modifications {S24 - reference SMM80-SMM81} which seek to provide better clarity or make corrections.

21. In terms of Policies G2 to G5:

a. are any modifications needed for soundness?

LPA Response: No.

22. In terms of Policy G6:

a. should SILs be explicitly referenced in the interests of policy effectiveness?

LPA Response: Yes. It is suggested that an amendment to make an explicit reference to Strategic Industrial Land is made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM82}.

b. is the definition of ‘industrial intensification’ justified and is it effective in providing for an appropriate level of flexibility to cater for business needs?

LPA Response: Yes. Given the scarcity of available land in the borough, in combination with the need to deliver additional housing and social infrastructure, and the economic benefits of the clustering of economic activity, industrial intensification is the most effective approach. Greenford Industrial Estate is an established, successful industrial estate with great road and public transport accessibility, making it an obvious location to seek to maximise the efficient use of the land by well-planned intensification.

c. are any modifications needed to Policy G6 for soundness?

LPA Response: No, with the exception of amendments as proposed in the Schedule of Suggested Modifications {S24 - reference SMM82} which seek to provide better clarity.

Hanwell Town Plan

23. In terms of Policy H1:

a. do the policies in the Plan support the in Policy H1(A) of maximising the opportunities provided by the Elizabeth Line?

LPA Response: Yes. The Elizabeth Line has had a catalytic effect on inward investment and delivering growth and development in the borough with five stations and Policy SP 4.1 G (i) seeks to harness this potential. The line helps provide improved connectivity to Central London, Heathrow Airport, and other outer London town centres. Hanwell has and will experience these benefits but as acknowledged under the strategic place interventions in Chapter 3, Hanwell will deliver a relatively lower quantum of residential led development

compared to some of the other towns in the borough due to there being fewer opportunities for new development.

- b. in light of the Vision for Hanwell referencing its rich history and prominent local heritage assets, do policies at H1(C) to (F) make appropriate reference to heritage assets in Hanwell, including assets associated with the Canal Network?**

LPA Response: Yes, heritage and the canal network are both referred to as a whole and in respect of particularly notable local features, such as Wharncliffe Viaduct. Most of these are not sites that will see major development, however, the significant potential for heritage-led development is specifically picked out in the policy.

- c. are the references to development at Trumpers Way Locally Significant Industrial Site and the area around Ealing Hospital consistent with the wider development plan, including specific allocations?**

LPA Response: Yes, the plan has generally avoided making allocations upon LSIS because of the need for these sites to undergo master planning in order to determine suitability for any uses other than those permitted by criteria-based policies in Chapter 5.

- d. are any modifications needed to Policy H1 for soundness?**

LPA Response: No.

24. In terms of Policy H2:

- a. Is the term ‘character led intensification’ sufficiently understood and how does this relate to the ‘design led’ approach in policy H2 of the London Plan? Do the requirements support making effective use of land?**

LPA Response: Yes, the character of the area is expanded upon in the supporting wording, and also in character evidence {EB42-45A&B}. Policy DAA provides a framework for the management of individual applications.

If there is a significant difference between a character-led and design-led approach, then it is in a better understanding of local context in the form provided for by Ealing’s character evidence base. Much as in the Paragraph 9 provisions of the NPPF, character and the effective use of land should not be seen as inherently competing considerations, but as mutually supportive provided that they are addressed through good design and a positive understanding of the nature of local character.

- b. do the allocations in the Plan and wider development plan policies support the effectiveness of Policy H2 and, taken together, the overall objective of Hanwell District Centre remaining the primary location for retail, cultural and community services?**

LPA Response: Yes, five of the eight Development Sites are located in or adjacent to the town centre and their future development are intended to help maintain and enhance Hanwell's role as a district centre and the heart of the local community. This is supported by measures, for example, to optimise the use of land, to enhance and diversify the retail and commercial offer, to improve connectivity and promote active travel and to enhance the cultural offering.

c. are any modifications needed to Policy H2 for soundness?

LPA Response: No.

Northolt Town Plan

25. In terms of Policy N1:

- a. does the evidence demonstrate that complementing Northolt's existing neighbourhood town centre with a new secondary neighbourhood centre will be effective? What are the anticipated effects, if any, on the vitality and viability of the existing neighbourhood centre and how is that evidence? Is the approach consistent with national policy in respect of ensuring the vitality of town centres?**

LPA Response: Evidence at Northolt, particularly the 20-minute Neighbourhood Framework and Regeneration Framework {EB116 & EB116} emphasise the dramatic severance caused by the A40, and the adverse effects this has particularly upon people living to the south. Non-vehicular travel is relatively limited in the area as a whole, and particularly south of the A40, and there is significant leakage from the whole of Northolt to outside centres.

Delivery on a new town centre at or around White Hart roundabout is predicated upon a significant quantum of new development and population growth, which would create the necessary demand to support a new centre. There should, therefore, be no adverse effect upon the existing Northolt town centre, which is likely also to benefit from a generalised improvement of the pedestrian environment and a shift away from car use.

- b. is the effectiveness of the new secondary neighbourhood centre dependant on the reconfiguration of the White Hart roundabout? What is the Council's response to TfL's regulation 19 response relating to the deliverability of the roundabout reconfiguration and what impact, if any, does this have for the justification and effectiveness of a new secondary neighbourhood centre?**

LPA Response: TfL's response on the deliverability of the reconfiguration does not have a bearing on the justification for the new secondary neighbourhood centre, which is driven by new development and population growth in the area and from a desire to improve the quality and amenity of the part of Northolt south of the A40. The 'effectiveness' of the new neighbourhood centre is more difficult to judge. The Council's view is that the roundabout reconfiguration remains highly desirable, as it would release land for further development, reduce severance, and significantly improve the walking and cycling experience and the

public realm. That would all make the neighbourhood more effective in terms of achieving council aims on modal shift. However, the new neighbourhood centre is still feasible and would still be effective in providing new housing and other uses, supporting good growth in Northolt, even if the roundabout were not reconfigured, as other improvements to improve walking and cycling permeability and reduce traffic impacts could still be considered and brought forward.

TfL's regulation 19 response was provided in the context of ongoing significant financial challenges following the pandemic; however, the picture has improved during 2025, with TfL now increasingly looking forward and beginning to plan for capital investment once more. The discussions held to date between TfL and council officers on the roundabout reconfiguration have been positive, indicating that the council's clear articulation of the ambition for the new neighbourhood centre is likely to support the case within TfL for initiating work on the roundabout.

- c. do the policies in the Plan support the aspiration in the Spatial Strategy for significant investment in active travel interventions and improved public transport? Will the measures be successful in reinforcing north- south connectivity?**

LPA Response: Yes. Significant investment has already been made in improving active travel along the key Mandeville Road and Kensington Road corridors, through the Visions for Northolt programme, funded by the Levelling Up Fund (LUF). A 2025 survey of works completed to date showed that north-south connectivity has been improved for pedestrians and cyclists. For example, the survey showed 36% more cyclists travelling along Mandeville Road compared with 2022, and an 80% increase in cyclists and 26% increase in pedestrians using the crossings on Kensington Road (2025 compared to 2022). The policies in the Plan will further support this investment, aligning with existing and future Visions for Northolt schemes as sites come forward for development. For example, Policy N2's priorities for Northolt Town Centre strongly support the aspiration to improve active travel connections across Northolt, in addition to the improvements at Northolt Underground station.

- d. are the references to development at the locations specified in Policy N1(G) consistent with the wider development plan, including specific allocations? Are all the housing estates referred to the subject of specific allocation in the Plan and, if not, why are they referred to? Is the Plan clear about the very limited circumstances where reconfiguration of green space may be supported and is this reflected in the associated site allocations?**

LPA Response: The housing estates referenced in Policy N1 Clause G are all the focus of future regeneration efforts. Some are likely to come forward sooner, and detailed work is already being undertaken, scoping the potential opportunities (including master planning) and developing proposals and these are all included as individual site allocations. These include Medlar Farm (05NO), Yeading Lane (6NO and (07NO) and Grange Court (08NO) which are in part tied up with strategic thinking about the potential reconfiguration of the White Hart Roundabout and proposals to create a new neighbourhood centre.

The other estates including Racecourse and Willow Tree are likely to be characterised by

more infill development. For example, on land adjoining the Racecourse estate, with infill development on Lewis Close and the garages at the end of Thirsk, Close and Redcar Close which have been included in the separate allocation for Mandeville Parkway (02NO).

Islip Manor was a proposed site allocation at Regulation 18 (NO04) but was not taken forward to Regulation 19 as plans are not well advanced and therefore difficult to show that the site was deliverable at the point of submission. It is also complicated by the need to undertake a further review of Green Belt (currently being undertaken in tandem with the GLA) to scope the potential for reconfiguration of the existing estate and therefore the green space. Given the condition of the estate, it is likely that this will be taken forward so the strategic objective in this plan is sensible, but it will likely only come forward as new site allocation in the next iteration of Ealing's Local Plan. If this is a concern, then reference to this estate can be removed as this was probably a legacy wording of the Regulation 18 plan?

e. are any modifications needed to Policy N1 for soundness?

LPA Response: No.

26. In terms of Policy N2:

a. how is the proposal for a new spatial masterplan to be taken forward and is the masterplan, and delivery of the measures in Policy N2(i), dependant on any of the allocations in the Plan?

LPA Response: A new spatial master plan was prepared as part of the 20-minute framework that was part of the Local Plan evidence base and has already been published {see EB116, from Page 50 onwards}. This sets out guiding principles that illustrate how Northolt could transition to become a 20-minute Neighbourhood and a framework that includes economic hubs, movement and residential. It also includes place specific proposals including for Northolt Town Centre.

More detailed master planning of the Car Sales Site and Northolt Leisure Centre (01NO) has also been prepared jointly with TfL, but this is not currently in the public domain due to commercial sensitivity. Whilst this site is the key site for delivering this masterplan, the site allocation is not dependent on it as the master plan framework above sets out the key principles in enough detail.

This work has also benefitted from the Mayor of London's The Town Architects programme, which is being piloted for two years and forms part of the Mayor's £1.25m Local Growth Capacity Support Programme which aims to support local growth and the design of public spaces in London.

b. are any modifications needed to Policy N2 for soundness?

LPA Response: No.

27. In terms of Policy N3:

- a. **how does the development of proposed allocations at Medlar Farm Estate (05NO) and Yeading Lane I (06NO) and the references to the White Hart Roundabout Strategic Masterplan Area and a related masterplan relate to policy N3? What is the planning status of the Masterplan Area? Taking the policy, the allocations, and the wider development plan together will they be effective in supporting sustainable development of the roundabout area?**

LPA Response: Regarding the role of the spatial master plan, please refer to the answer to Q.26 a) above. It also includes place specific proposals including for the White Hart Roundabout and environs. The estate regeneration sites are currently outside the scope of the framework but present opportunities to improve street interfaces and to contribute to the proposed new neighbourhood centre, including enhanced permeability.

More detailed master planning of the White Hart Roundabout has also been prepared but this is not currently in the public domain due to commercial sensitivity. This has been shared with TfL and feedback was positive but further work is to be undertaken regarding the options for potential reconfiguration in more detail. See also answer to 25(b) above.

- b. **in light of comments from TFL, is the reconfiguration of the White Hart Roundabout deliverable? If not, what are the implications for the effectiveness of the policy (and its associated policies in the development plan?**

LPA Response: The reconfiguration of the White Hart roundabout has yet to be determined in detail, and is currently at a high level of discussion, with no preferred options yet identified. Hence deliverability has yet to be formally assessed, either by TfL or through a commissioned feasibility study. It is the current position of the council, following discussions with TfL and the GLA, that the scheme should be taken forward for further feasibility work, as both TfL and GLA have indicated support for this, i.e. to jointly articulate possible options for reconfiguration, which will range widely in terms of ambition and cost. If it is established that the reconfiguration is not deliverable in any form, there would be implications for the master planning of the roundabout, pedestrian and cyclist access and the public realm, but clauses (ii) to (ix) of Policy N3 could still be delivered effectively.

- c. **are any modifications needed to Policy N3 for soundness?**

LPA Response: No.

28. In terms of Policy N4:

- a. **is the boundary of the Northolt Industrial Estate clearly defined, including designations, and appropriate in terms of scope?**

LPA Response: Clarity and effectiveness could be improved by changing the reference to “Northolt Industry” given that this area immediately joins and interacts with industrial land and uses outside of the Northolt area.

- b. **does the evidence support the assertion that industrial intensification of the estate will unlock significant new industrial floor space? How will the policies in the wider development plan assist with delivery?**

LPA Response: Northolt is one of the few areas which has been identified as having potential for net gain in designated industrial land, at Northolt Driving Range, and this is particularly significant because it adjoins an existing designated industrial area. Generalised intensification of industrial land, particularly that which is expected along the A40 corridor, will be greatly facilitated and enhanced by the allocation of new sites for industrial development.

Intensification of industrial land is facilitated both by Chapter 5 thematic policies, and also by extensive coverage in the London Plan, and no additional provision, other than the identification of the spatial opportunity, is considered necessary in Northolt Town Plan.

- c. **in light of comments from TFL, is the reconfiguration of the White Hart Roundabout deliverable? If not, what are the implications for the effectiveness of the policy (and its associated policies in the development plan?)**

LPA Response: Please refer to the answer to 27 b above. This seems to be a duplicate question and does not relate specifically to Policy N4.

- d. **are any modifications needed to Policy N4 for soundness?**

LPA Response: No.

Perivale Town Plan

29. In terms of Policy P1:

- a. **how will the policies in the Plan support the diversification of Perivale's local shopping parades?**

LPA Response: The Perivale town plan sets out a number of ways to achieve that including:

- Public realm improvements to attract more businesses and shoppers.
- Connectivity improvements that will increase footfall.
- Improve the range of retail, food and drink, community, and leisure uses
- Provide a new neighbourhood centre on Horsenden Lane South / Perivale station.
- Work collaboratively with TfL and industrial landowners to optimise the potential for future mixed/use development and ensure significant improvements in connectivity and public realm.

- b. **is the provision of the canal crossings set out in the policy deliverable?**

LPA Response: No. Whilst the council retains an aspiration to deliver a new canal crossing,

particularly in the light of comments from the Canal and River Trust, more work needs to be done to ensure that this project can be successfully delivered and any necessary impacts and mitigations properly considered. It is therefore suggested that a modification is made to Policy P1 D (vi) as follows:

vi) ~~Investigate the potential for~~ Providing an enhanced canal crossing that will connect into the eastern edge of Horsenden Hill, with an active travel route through Horsenden Hill to provide a connection to Sudbury Hill.

c. is the position that Perivale will see relatively limited levels of residential led development consistent with national policy and in general conformity with the London Plan?

LPA Response: Yes. Development should be directed to the most appropriate locations, taking into consideration land availability, accessibility, development constraints, and the existing character of an area. Land availability is limited in Perivale, with the significant industrial activity in the area posing a constraint to the potential for high levels of residential development. None of Perivale's proposed development sites have been identified as being in principle suitable for a tall building.

The NPPF requires LPAs to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment and planning policies should identify a sufficient supply and mix of sites, considering their availability, suitability and likely economic viability {EB10, Para.69}. Planning policies and decisions should also help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development {EB10, Para.85}.

The London Plan {EB13, Policy D1} requires area-based assessments should seek to identify those areas appropriate for extensive, moderate or limited growth to accommodate borough wide requirements. This is based on the characteristics, qualities and value of different places within the plan area. The Mayor of London has not raised any concerns regarding conformity with the London Plan in this regard.

d. are any modifications needed to Policy P1 for soundness?

LPA Response: No.

30. In terms of Policy P2:

a. is the boundary of the Perivale Neighbourhood Centre clearly defined and appropriate in terms of scope?

LPA Response: Yes, it is shown in Figure P2: Perivale Spatial Strategy. It is located along Bilton Road, from the intersection with Parva Grove to the intersection with Torrington Road approximately. The number and types of shops and the function it serves fit the definition of a neighbourhood centre, meeting primarily the convenience needs of the local area.

The London Plan {E13, Annex 1} defines local and neighbourhood centres as typically serving a localised catchment often most accessible by walking and cycling and including local parades and small clusters of shops, mostly for convenience goods and other services. They

may also include a small supermarket (typically up to around 500 sqm), sub-post office, pharmacy, laundrette and other useful local services. They can play a key role in addressing areas deficient in local retail and other services.

b. are any modifications needed to Policy P2 for soundness?

LPA Response: No.

31. In terms of Policy P3:

a. are any modifications needed to Policy P3 for soundness?

LPA Response: No.

32. In terms of Policy P4:

a. how will the policies in the Plan, and related development management activity, be effective in supporting a new neighbourhood centre?

LPA Response: There are several ways including:

- Public realm improvements to attract more businesses and shoppers.
- Connectivity improvements that will increase footfall.
- Provide a range of retail, food and drink, community, and leisure uses including providing anchors that encourage people to dwell
- Work collaboratively with TfL and industrial landowners to optimise the potential for future mixed/use development and ensure significant improvements in connectivity and public realm.

b. are any modifications needed to Policy P4 for soundness?

LPA Response: No.

33. In terms of Policy P5:

a. is the boundary of the Perivale Industrial Estate clearly defined, including designations, and appropriate in terms of scope?

LPA Response: Yes, as shown in Figure P2: Perivale Spatial Strategy.

b. is the aim of diversifying and enhancing the employment and business offer on the estate clear?

LPA Response: Yes, this is repeated several times in the Perivale town plan including:

- Policy P1: Perivale Spatial Strategy / Creating good jobs and growth
- Paragraph 4.6.25
- Policy P5: Perivale Industrial Estate
- Paragraph 4.6.37

c. are any modifications needed to Policy P5 for soundness?

LPA Response: There is one minor modification suggested for Policy P5 (reference SMM100) for clarity purposes. No modifications for soundness are needed.

Southall Town Plan

34. In terms of Policy S1:

- a. **how will the policies in the Plan contribute to future development celebrating and strengthening the character and heritage of Southall as a cultural destination?**

LPA Response: Southall's character and heritage is well documented in the Character Study {EB42} including identifying buildings and places of architectural and cultural heritage significance. Furthermore, the policy is informed by the Ealing's Cultural Manifesto and the Cultural Infrastructure Plan {EB86}. These recommendations were informed by a baseline study {EB86} and build upon current projects and potential mixed use development opportunities including site allocations in the Local Plan.

Although, the short-term actions would be aimed at existing cultural venues, celebrating food and retail offer, events and festivals; the medium to long term actions relate to developing a "Southall centre for culture". It will further enhance Southall's unique position as a cultural destination and showcase local cultural narratives through a new cross-art-form cultural centre.

- b. **paying regard to Policy S1(G) will the policies in the Plan be effective in terms of fighting inequality? How will development activity improve access to primary healthcare infrastructure and enhance existing social and community infrastructure?**

LPA Response: Southall, along with Acton is identified as the most significant area of need in the Ealing Local Plan Health Study {EB69}. The peculiar characteristic of primary healthcare provision in Southall, and particularly of GP practices, is their small size and resulting shortcomings in provision. Given general funding constraints for health infrastructure, and a significant drive toward newer and efficient forms of operation development will play an essential enabling role in the consolidation and expansion of these facilities.

- c. **is the redesignation of Charles House and the Balfour Business Centre as LSIS justified? Are boundary changes clear?**

LPA Response: The lack of potential for new industrial land in Ealing, and a net rise in anticipated industrial demand make pressing the designation of any areas suitable for industrial use and management. In the case of Charles House and Balfour Business Centre release from their status as a Major Employment Location (MEL - the precursor to LSIS) in the adopted local plan did not succeed in facilitating the redevelopment of those sites for the intended, residential-led purposes, or in repairing the conflict caused by the current, informal retail-led uses with the remaining LSIS. Reversion to industrial designation and

management, and consolidation with the rest of the LSIS is therefore a reasonable and necessary approach.

The boundary changes are clearly set out in Map 41 of the Atlas of Change {S17}.

d. how will the policies in the Plan promote innovative design solutions to facilities inter-generational living and will they be effective?

LPA Response: Promoting greater provision of housing suitable for intergenerational living will of necessity be a task primarily for the housing strategy, and individual development proposals. However, it is appropriate for the plan to identify this as a specific local need in Southall, and to provide support for this form of development.

e. how will the policies in the Plan make an effective contribution to fully realising the growth and regeneration potential of the Southall Opportunity Area?

LPA Response: A large part of Southall was designated an Opportunity Area in the 2011 London Plan, identifying a potential for 9,000 new homes and 3,000 new jobs by 2041. The designation was driven by a combination of a number of former industrial brownfield sites and the planned arrival of the Elizabeth Line at Southall Station. The housing pipeline for Southall shows that the target is not just going to be met but will be exceeded and will be delivered sooner than originally expected.

f. is the boundary of the Opportunity Area clear? Is it altered as a result of the Plan? If so, why and is the change clear and justified?

LPA Response: Yes and no alterations to the OA boundary are proposed.

g. taking each in turn, how have the requirements of Policy SD1(B) been considered and reflected in the Plan?

LPA Response: In terms of each clause in London Plan Policy SD1 B:

- Clause 1) - Southall was identified in the opportunity area planning framework as having capacity for 9000 homes and 3000 jobs by 2041. Whilst the geographies do not correspond precisely, Southall has been identified for a further 14,944 homes (net) anticipated to be delivered between 2024/25 and 2038/39.
- Clause 2) - As set out above. In addition, the 'creating good jobs and growth' section describes particular efforts to improve the quality and range of employment available in Southall; building on key local strengths such as businesses related to Heathrow, the West London College Green Skills Hub, and the potential for film studios as part of the West London cluster of film businesses, and by protecting LSIS and promoting growth and intensification.
- Clause 3) - As set out in Table S1, and particularly in the Health Study {EB69}.
- Clause 4) – Policy S1 H i & ii provisions concerning Southall's two conservation areas, Norwood Hall, and the Grand Union Canal. This builds on work that is already taking place, particularly in relation to Southall Manor.

- Clause 5) – See the response to Clause 1) above.
- Clause 6) - Policy supports and expands the extent of current designated industrial land, and supports intensification, including collocation subjects to masterplans.
- Clause 7) – The Mayor’s Transport Strategy (2018-41) has a mode share target of 80% of all journeys in London being made by walking, cycling and public transport by 2041, with a specific mode share target of 76% for Ealing. However, this target is not broken down further to town level by TfL, and there is not sufficient data available for the council to determine a suitable target, as journey data is aggregated at borough level. For Southall it is considered more appropriate to focus on improvements to active travel and public transport, and to deliver on London Plan policies regarding car parking and cycle parking provision, in order to enable modal shift and contribute to the overall borough mode share target.
- Clause 8) - The extent of the Opportunity Area is broad, and Southall is a relatively self-contained centre. However, cooperation has taken place with colleagues in Hounslow to expand connectivity between Southall Station and the Golden Mile, and the area forms part of greater Heathrow sub-region and falls within the scope of Joint Spatial Planning Framework.
- Clause 9) - See documentation on the broader local plan consultation and the duty to cooperate. These activities included public and stakeholder engagement on the emerging Southall Town Plan.
- Clause 10) – This provision is not Southall specific.
- Clause 11) - This is primarily dealt with in relation to specific sites, for example, Southall Green Quarter.

h. paying regard to Policy H1(B)(c) of the London Plan, how does the development plan enable the delivery of housing capacity identified in the Opportunity Area?

LPA Response: Yes. See also the response to Q.34 e) above. This is also reflected in the fact that in a recent assessment of the role and contribution made by Opportunity Areas in London being undertaken to inform the current review of the London Plan, Southall OA was described as ‘mature’ acknowledging the progress being made to date and the healthy development pipeline. This may be contrasted with, for example, Old Oak Park Royal which is described as ‘ready to go.’

i. how has planned infrastructure investment been considered and does the Plan take the opportunity to capitalise on the potential regeneration benefits, including any necessary phasing?

LPA Response: Given the relative maturity of the OA, infrastructure investment other than that which has already taken place in the form of the Elizabeth Line is now largely being led by population growth, so it is more a case of growth facilitating the reorganisation and improvement of infrastructure than of significant opportunities for growth occasioned by anticipated infrastructure investment.

j. will the Plan be an effective replacement for the Southall Opportunity Area Planning Framework?

LPA Response: Yes. See also the response to Q.34 e) and h) above. It should also be borne in mind that the Southall OAPF was adopted in July 2014 and though it has acted as a catalyst for future development it is more than a decade old and has been largely superseded.

- k. **taken as a whole, is the Plan in general conformity with the London Plan in relation to the Southall Opportunity Area?**

LPA Response: Yes. Furthermore, the Mayor of London has raised no concerns regarding conformity with the London Plan.

- l. **are any modifications needed to Policy S1 for soundness?**

LPA Response: No, with the exception of an amendment as proposed in the Schedule of Suggested Modifications {S24 - reference SMM104} which seek to provide better clarity. This includes amendments to Table S1 which sets out key infrastructure requirements.

35. In terms of Policy S2:

- a. **is the policy in general conformity with the London Plan in respect of Major Town Centres? Paying regard to Policy E9 (c) of the London Plan, how does the Plan support the bringing forward of capacity for additional comparison goods retailing?**

LPA Response: The retail strategy for Southall has been central to plan making since the initiation of the OA. This allocated space for mainstream High Street offerings within the Green Quarter as a compliment for Southall distinctive existing retail sector. Lack of demand by conventional comparison retailers has seen this scaled back in subsequent planning applications, and allocation for mixed development and active ground floors should be seen as reflecting the current degree of market appetite for retail development in Southall.

Support in S2 i for retail development provided that it strengthens the town centre should be seen as conducive to further retail development if market interest improves over the plan period and conforming with the guidance of the London Plan.

- b. **is the intended effect on and relationship with the Green Quarter development clear?**

LPA Response: See response to Q.35 a above, retail development in the Green Quarter is now largely set through planning consents and further policy guidance is not considered necessary at this point.

- c. **are any modifications needed to Policy S2 for soundness?**

LPA Response: No, with the exception of an amendment as proposed in the Schedule of Suggested Modifications {S24 - reference SMM105-107} which seek to provide better clarity.

36. In terms of Policy S3:

a. is the expansion of the King Street Neighbourhood Centre supported by evidence?

LPA Response: The current wording is probably misleading because the extent and boundary of the neighbourhood Centre are not proposed to change. The policy was intended to recognise the potential for growth in the form of improvement and intensification as a result particularly of allocation 10SO The Green. Clarity and effectiveness could be improved by the following additional suggested modification:

“(ii) ~~Expanding the King Street Neighbourhood Centre, west of The Green, to encompass new~~ **Growing and improving the** retail, food and beverage, and employment ~~uses~~ **offer** (at The Green); alongside public realm improvements and a high-quality pedestrian environment linking to public and green spaces.”

b. how will the policies in the Plan assist with securing the long-term survival of the heritage assets set out in Policy E3(v) and will they be effective?

LPA Response: The role envisaged for the plan in preserving his heritage assets is largely a supporting one, with “active measures” in this case intended to indicate that the Council will take actions beyond its role as LPA, as has already occurred with the refurbishment and use of Southall Manor thanks to fundraising and regeneration efforts.

c. are any modifications needed to Policy S3 for soundness?

LPA Response: No.

37. In terms of Policy S4:

a. is the reference to extending Southall Major Centre in general conformity with the London Plan, specifically Policy SD8(C)?

LPA Response: Yes. There is no intention to change the classification of the town centre which is classified as a Major Centre and the Mayor of London has raised no concerns regarding conformity with the London Plan. The reference in Policy S4 gives practical effect to a reconfiguration of the town centre boundary that was actually implemented by the current Development Strategy DPD adopted in 2012 {EB1, Policy 2.8}.

b. are any modifications needed to Policy S4 for soundness?

LPA Response: No, with the exception of amendments as proposed in the Schedule of Suggested Modifications {S24 - reference SMM106-107} which seek to provide better clarity. This includes taking account of a planning application that was approved after Regulation 19 which results in a significant uplift in the quantum of residential development and changes in the mix of uses.

38. In terms of Policy S5:

a. are any modifications needed to Policy S5 for soundness?

LPA Response: No.

{END}