Ealing LPA Local Plan (Regulation 24) 2025

Matter 9, Q10:
Development Sites

Issue:

Whether the development sites proposed for allocation in the Plan 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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10. Site specific questions:

For each proposed development site, please set out:

a. **the background and how it was identified;**
b. **the uses to be permitted and how they are justified;**
c. **how the boundaries and extent of the site have been defined and justified;**
d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**
e. **for commercial development, the estimated floorspace and whether this is justified;**
f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**
g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**
h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**
i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**
j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**
k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified,**
l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**
m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**
n. **how measures designed to promote sustainable travel will be effective;**
o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**
p. **any modifications that are necessary for reasons of soundness.**

LPA Response: Answers follow for each of the Development Sites in Chapter 4 of Ealing LPA's Local Plan in the order in which they appear in the plan. Answers should be read alongside any responses to Questions 1-9 and 11-115 set out in a separate written statement responding to Matter 9, where relevant.

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01AC Acton Gateway (Morrisons):

a. the background and how it was identified;

LPA Response: The site is allocated in the adopted Development Sites DPD 2013 {EB2}, ACT2 Acton Gateway. The site has not been redeveloped and occupies a significant location at the entrance to the town centre, adjacent to Acton's town square with its statutory and locally listed buildings and street market. The site is highly accessible, and there is great potential to make more efficient use of the site, and a significant contribution to placemaking in Acton Town Centre, including more permeability through the site and opening up views to and from the listed St Mary's Church.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, EAL3 Arcadia.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are residential, retail/food/beverage, community and public space. The current configuration of the site includes a surface level car park that comprises a third of the site. The proposed uses will help deliver a more successful, sustainable, mixed-use town centre that makes the best use of land, including much needed residential units and an improved public realm with more permeability through the site.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The site boundary duplicates that of the current site allocation, reflecting the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 377 net units (comprising 377 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated net capacity for this site derives from the Tall Building Study Appendix Part 1(EB45A).

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. for commercial development, the estimated floorspace and whether this is justified;

The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Floor space should deliver active frontages along all street edges and support the broader town centre.

LPA Response:

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress (where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	0	75	75	75	76	76	0	0	0	377

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of an application, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 30.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, archaeology, the town centre and regeneration.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but it abuts Acton Town Centre Conservation Area with a prominent aspect and is within the setting of listed heritage assets including St Marys Church (GII). There is an opportunity to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding archaeology, the site is within an Archaeological Priority Area. Further consultation with either GLAAS or a conservation heritage advisor will be required over any future development proposals.

Regarding its town centre and strategic area for regeneration location, the site is a strategic site which offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer and provide more affordable homes and social infrastructure.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include improvements to the public realm and spaces, especially King Street; tree planting and greening; and social infrastructure including health facilities. The site is in a very accessible location with good access to bus and train services. In the wider Acton area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and

which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and or less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 6.98%.

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account of the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant

typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM46}.

02AC Acton Gardens:

a. the background and how it was identified;

LPA Response: Acton Gardens is a large regeneration project in South Acton that was one of the council's priority housing estates for renewal identified in the 2008 Estates Review. The outline planning application was approved in 2013 and a revised masterplan approved in 2018. The regeneration of the South Acton Estate is an ambitious phased project that is expected to be completed in 2030 - 2033. The project is replacing existing housing with new higher density housing to optimise the use of land. The new housing is a mix of social rent, private rent, market sale, shared ownership and shared equity and the provision of new community facilities, shops and improved green spaces and play areas.

The site was identified through the extant planning permission.

b. the uses to be permitted and how they are justified;

LPA Response: The permitted uses are residential, with some ground floor commercial, open space and community uses. The uses reflect the extant planning permission and will help deliver a successful, sustainable development in line with the council's ambitions for this large regeneration project.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary reflects the remaining phases of the extant planning permission, with the inclusion of the Annoor Cultural and Community Centre on Church Road which the council believes will benefit from inclusion as part of the regeneration of the estate and area.

Officers have had discussions with the developer following their representations to the Reg 19 consultation regarding the boundary and have suggested a modification to the boundary to remove an area that has already been developed and reflect more accurately the current remaining phases of the extant planning permission. It is therefore suggested that the boundary be amended as suggested in the Schedule of Suggested Modifications {S24 SMM47} and Schedule of Suggested Modifications Appendix B {S24b}.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 425 net units (comprising 1,200 gross gains and 775 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units. These figures also exclude any capacity which has already been completed.

Based on the original phasing plan the allocation now encapsulates phases 7.2, 7.3, 7.4, 7.5, 8.3, 10.1, 10.2, 11.1 & 11.2. These outstanding phases are approved in outline (182579OUT) only at this stage, but plans for further optimisation are currently being considered, which may trigger a revised application. The developer has indicated in their Reg. 19 submission that based on a further optimisation and redesign of the site that the remaining phases covered by the allocation could yield a minimum of 1,200 units (gross), which has formed the basis of the input given here.

Following the publication of the housing trajectory (EB73), the developer has presented revised figures as part of their hearing statement for matter 9 of block 2, correcting the number of existing units proposed to be lost (now 436) and indicating their ambition to further optimise the site bringing the gross gains up to 2,000 units (revised from 1,200 units indicated previously). As proposed, this would give a net figure of 1,564 units.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: Commercial floor space is not specified by the allocation; anticipated provision is primarily that which is necessary to animate the new square at South Acton station and is justified by the increase in population and the traffic at the station itself.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	85	85	85	85	85	0	0	0	0	0	0	425

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A. For ease of reference this is summarised here:

This advises that bespoke phasing was employed, noting that a revised masterplan has yet to be submitted. The timing of build out also reflected the gross total rather than the net figure. It should be noted that a revised phasing programme has been presented by the developer as part of their Matter 9 Block 2 hearing statement.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, green space designations including a SINC, the town centre and regeneration.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but it abuts Mill Hill Park and Acton Town Centre Conservation Areas. There is an opportunity to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the various green space designations, the site is located within an area of deficiency in access to small / local / pocket and district parks. The allocation requires the provision of new green infrastructure including new green spaces and retention of the allotments and potential expansion together with improvements to the public realm including enhanced permeability.

Regarding its town centre and strategic area for regeneration location, the site is a strategic site which offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and provide more affordable homes and social community infrastructure.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include an energy centre, new public open space and public realm improvements, works to public highway, community space, and educational facilities. In the wider Acton area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and or less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 3.97%.

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: The measures to promote active travel take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. A Travel Plan supports measures to promote sustainable travel to the site and supports the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: Yes, in relation to the site boundary as highlighted in the Council's response to Initial Questions dated 10 January 2025 [EX3] and the Council's Written Statement on Matter 9, Qs1 – 9 & 11 – 115: Development Sites at Q.7. It is suggested that further amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM47 and SMM48}.

03AC Ealing Common Depot:

a. the background and how it was identified;

LPA Response: The site is owned by Places for London (Transport for London Property). The site comprises TfL's Museum Depot, and four operational facilities. TfL has a statutory duty to keep the museum collection, which is part of the national railway collection, and has indicated that it would look at options for relocating the collection if it cannot be accommodated on the site. Similarly, some of the operational facilities could be relocated to an adjacent depot to realise the full potential of the site.

The site was identified through the Early Call for Sites and the London Strategic Housing Land Availability Assessment (SHLAA) 2017**.**

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are for residential, with reprovision of the TfL Museum (if feasible), café/restaurant and music venue. The uses reflect both the aspirations of Places for London (TfL property) and those of the council who believe the site can provide both much-needed residential development and a music venue with café/restaurant as part of increasing Ealing's cultural offer.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The site boundary was agreed with the landowner, Places for London (TfL) following several discussions on what should and could be included within the red line. It reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 225 net units (comprising 225 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool, which assumed the comprehensive redevelopment of the site. Further detail about this tool is explained on page 14 of EB73.

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. for commercial development, the estimated floorspace and whether this is

justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Identified commercial space is limited to a community or café/restaurant and/or the potential for music venue which are justified by the increase in population of the site and the retained museum/depot use.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress (where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	56	56	56	57	0	0	0	0	0	225

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed, informed by landowner input and interest.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, green space designations including a SINC and non-designated industrial uses.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within

the site, but the southern accessway is within the setting of listed heritage assets including Acton Town Station (GII). There is an opportunity to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the various green space designations, the site is located within an area of deficiency in access to small / local / pocket and district parks. The allocation requires the provision of new green infrastructure including new green links and enhanced biodiversity through tree planting and soft landscaping.

Regarding non-designated industrial uses, future development must satisfy London Plan and Ealing Local Variation Policy E4.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include a pedestrian link through the site from Phillimore Gardens to Museum Way, green links linking the site to the railway SINC, and a green corridor to the Heathfield Gardens SINC. In the wider Acton area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and or less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 2.78%.

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range

of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM49}.

04AC Builders Merchants Bollo Bridge Road:

a. the background and how it was identified;

LPA Response: The site is privately owned and has an extant planning permission for 32 flats and three terraced houses. Although the site is small (0.19ha), its location close to South Acton Station, Acton Town Centre and industrial sites at The Vale and South Acton gives it strategic significance, reflecting its accessibility. The site is currently occupied by a timber and builders' merchant business.

Planning application 217146FUL was granted permission (awaiting a legal agreement) in May 2024. The permission is for redevelopment of the site to provide a part three, part four, part five-storey plus basement block of 32 flats and a terrace of 3 three-storey plus basement houses and is a revised scheme.

The site was identified through a pre application meeting.

b. the uses to be permitted and how they are justified;

LPA Response: The uses proposed are for residential with some employment use. The uses will help to deliver a successful, sustainable development that makes the best use of land and provide much-needed housing for the borough.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary matches that of the extant planning permission and reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 40 net units (comprising 40 gross gains and 0 gross losses). As the site is categorised as a 'small site' with a site area smaller than 0.25ha, the capacity figure given here does not feature as an individual site input in the trajectory and is substituted with a single modelled/forecast small sites windfall input.

Notwithstanding this position, an individual site capacity figure has been generated to provide an indicative figure for this exercise only. Note this site is also subject to a pending application 217146FUL for 35 units.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Identified commercial space is to be considered by development.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: As this allocation is categorised as a small site and individual site capacity estimates have been substituted by a single combined input covering the contribution from all small sites, phasing has not been determined at an individual site level.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, green space designations including a SINC and non-designated industrial uses.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding the various green space designations, the site is located within an area of deficiency in access to district parks. The allocation requires a reduction of any adverse the environmental impacts particularly the Green Corridor and SINC running along the railway line which is protected by Tree Preservation Orders. This includes public realm, landscaping and greening improvements.

Regarding archaeology, the site is within an Archaeological Priority Area. Further consultation with either GLAAS or a conservation heritage advisor will be required over any future development proposals.

Regarding non-designated industrial uses, future development must satisfy London Plan and Ealing Local Variation Policy E4.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm, landscaping, and greening improvements. In the wider Acton area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A.

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and or less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 1.26%.

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: The Transport Statement for the site outlines proposals to support sustainable transport and aims to maximise the good accessibility of the site to public transport services including Acton Town and South Acton stations and numerous local bus routes. There are 18 car parking spaces provided, lower than the maximum provision of 28, all with EV charging; the provision of 82 cycle parking spaces is higher than the 60 spaces required to comply with the London Plan. The Active Travel Zone assessment outlines various improvements to walking and cycling in the vicinity of the site. Altogether these measures will support low vehicular access to the site and will ensure safe and comfortable journeys can be made by sustainable modes.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No.

05AC Salisbury Street Car Park & Neville Close:

a. the background and how it was identified;

LPA Response: The site is owned by the council and includes a public car park and sheltered accommodation for older people. The council is decommissioning the three blocks of sheltered accommodation as they are no longer fit for purpose, for example there are no lifts. The car park has been identified as suitable for inclusion in the site due to its proximity to the town centre. Proposals for the redevelopment of the site are for a mixed use residential led scheme that reprovides affordable and assisted housing alongside community uses.

The site was identified as a council owned site that the council would like to see redeveloped.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are for residential, and community uses. The residential units will reprovide affordable and assisted housing alongside community uses. The redevelopment of the site will enable the reprovision of much needed assisted and affordable housing to replace the current sheltered accommodation that is no longer fit for purpose. The community uses will make a substantial contribution to the vitality of Acton Town Centre.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary correlates with the council's ownership and reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 63 net units (comprising 109 gross gains and 46 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

The anticipated net capacity for this site derives from the Tall Building Study Appendix Part 2 (EB45B).

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential led". Identified commercial space is justified by its location in the town centre.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	31	32	0	0	0	0	0	0	0	0	0	63

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A. For ease of reference this is summarised here:

This advises that bespoke phasing was employed, informed by landowner input, but moderated to reflect planning status. Whilst it was expressed that delivery should occur within 5 years, as this pace was necessary to access affordable housing funding, it was noted that the site doesn't currently benefit from a planning permission, and therefore it was appropriate to moderate delivery assumptions spreading delivery across years 5 and 6.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, archaeology, green space designations including a SINC and the town centre location.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within

the site, but it abuts Acton Town Centre Conservation Areas and is within the setting of listed heritage assets including Acton Town Hall (GII). There is an opportunity to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding archaeology, the site is within an Archaeological Priority Area. Further consultation with either GLAAS or a conservation heritage advisor will be required over any future development proposals.

Regarding the various green space designations, the site is located within an area of deficiency in access to small / local / pocket and district parks. The allocation requires improvements to the public realm including landscaping and greening improvements.

Regarding its town centre and strategic area for regeneration location, the site is a strategic site which offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include a community centre/facilities and public realm, landscaping, and greening improvements. In the wider Acton area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and

which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A.

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and or less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 2.61%.

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant

typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No.

06AC Acton Vale Industrial Park & Westgate House:

a. the background and how it was identified;

LPA Response: The site is located towards the eastern border of the borough and currently accommodates workshops, small industrial units, and offices within Westgate House to the north of the site. It is located in East Acton, close to the boundary with LB Hammersmith and Fulham, with excellent bus routes on the Vale. Redevelopment of the site with residential units co-located with industrial units will provide an uplift in industrial space. The council would like to see Westgate House retained and retrofitted.

The site was identified through the London SHLAA 2017.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are for industrial and employment uses with the co-location of residential uses. Redevelopment of the site will provide an uplift in industrial space and the opportunity to provide much needed residential units for the borough in an accessible location. The mixed use will help to deliver a successful, sustainable development that makes the best use of land.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The site boundary encompasses the whole of Acton Vale Industrial Park and includes Westgate House on The Vale. Representations received at Reg 19 consultation from the owners of Westgate House requested that their property be allocated separately due to the sites being functionally separate and their property being potentially available for redevelopment within an earlier time frame. The inclusion of Westgate House as part of a broader allocation will help to ensure a more comprehensive development coming forward, which would be more beneficial for the council's placemaking aspirations for the area. Whilst it is possible that proposals for Westgate House could come forward sooner than for the Industrial Park, this would not prevent a permission being granted, as timelines in site allocations are not restrictive of development.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 26 net units (comprising 26 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool, which assumed a mixed-use intensification model for this site prioritising industrial provision. Further detail about this tool is explained on page 14 of EB73.

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and identified commercial space is justified by the extant industrial floorspace.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress (where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	8	9	9	0	0	0	0	0	0	26

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of an application, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 28.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage and non-designated industrial uses.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site but are within proximity of listed heritage assets including Victoria Junior School (GII). There is an opportunity to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding non-designated industrial uses, future development must satisfy London Plan and Ealing Local Variation Policy E4.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm, landscaping, and greening improvements. In the wider Acton area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: No loss is proposed.

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and

potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM50}.

07AC Dean Court:

a. the background and how it was identified;

LPA Response: The site is owned and managed by A2Dominion, a Housing Association. The site is within five minutes walking distance of Acton Mainline Station on the Elizabeth Line. The existing 42 flats are arranged over three storeys, with two storey maisonettes accessed by external staircases that are not accessible. The redevelopment of the site would result in an increase in units, providing a mix of tenures, with an improved and accessible design that is more energy efficient and that makes better use of the land.

The site was identified through the Regulation 18 Call for Sites.

b. the uses to be permitted and how they are justified;

LPA Response: The uses are for residential. The redevelopment of the site will replace the existing units and provide a quantum uplift. A residential scheme is considered to be the most appropriate and sustainable option for this site, which is located within a residential area.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The site boundary corresponds to that which was submitted by A2Dominion through the Regulation 18 Call for Sites. The site boundary reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 377 net units (comprising 419 gross gains and 42 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

The anticipated net capacity for this site derives from the Tall Building Study Appendix Part 2(EB45B), with adjustments made to account for the loss of existing units.

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: N/A

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	94	94	94	95	0	0	0	0	0	377

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed, informed by landowner input and interest. The site was promoted as part of the Call for Sites exercise.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with green space designations including a SINC and regeneration.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding the various green space designations, the site is located within an area of deficiency in access to district parks. The allocation requires the provision of public realm, landscaping and greening improvements including tree planting.

Regarding its strategic area for regeneration location, the site offers an opportunity, for example, to optimise the use of the land and provide more affordable homes.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm, landscaping, and greening improvements. In the wider Acton area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. where applicable, evidence of how the provisions of the Planning (Listed

Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site, including its proximity to Acton Main Line station, and active travel schemes in the vicinity (existing and proposed), and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM51}. However, to ensure better clarity and ensure the policy is effective, a further suggested amendment is proposed under contextual considerations as follows:

> "*Development proposals should consider nearby features of ecological value (SINC and Green Corridor) and ensure the need for sensitive treatment along the northern edge of the site*."

08AC Oaktree Court:

a. the background and how it was identified;

LPA Response: The site is owned and managed by A2Dominion, a Housing Association. The site is located within easy walking distance from Acton Mainline Station on the Elizabeth Line. The site currently accommodates 30 flats in three-storey prefabricated buildings, surrounded by open space and car parking for 30 cars. Redevelopment would provide better designed, higher quality, more energy efficient homes, with a mix of tenure and private amenity space.

The site was identified through the Regulation 18 Call for Sites.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed use for this site is for residential. The site is situated within an entirely residential area and the proposed use is the most appropriate for its location.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary corresponds to the one submitted by A2 Dominion through the Call for Sites and reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 11 net units (comprising 41 gross gains and 30 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool, which assumed the full redevelopment of the site. Further detail about this tool is explained on page 14 of EB73.

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: N/A

f. evidence of the expected timescale and rate of development, and how

assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	4	4	3	0	0	0	0	0	0	0	11

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed, informed by landowner input and interest. Although no formal planning activity has progressed as yet it is noted that the site was promoted as part of call for sites exercise which may be indicative of readiness. The Call for Sites feedback estimates delivery between years 29/30 and 31/32.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with green space designations including a SINC. There are protected trees along the northern and eastern boundaries of the site. The intensity of development on these parts of the site is likely to be constrained as a result.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding the various green space designations, the site is located within an area of deficiency in access to small / local / pocket and district parks. The allocation requires the provision of public realm, landscaping and greening improvements.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the

assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm, landscaping, and greening improvements. In the wider Acton area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site, including its proximity to Acton Main Line station, and active travel schemes in the vicinity (existing and proposed), and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM52}.

01EA Broadway Connection & Arcadia

a. **the background and how it was identified;**

LPA Response: This is a key strategic site in Ealing Metropolitan Town Centre that has an extant planning permission. The site forms part of an existing site allocated in the adopted Development Sites DPD 2013 – EAL3 Arcadia. The Arcadia site was added to the proposed development site at Regulation 19 following a representation from the landowner at Regulation 18 asking the council to allocate the site. Arcadia was added to the Broadway Connection site to enable a more comprehensive and cohesive redevelopment of this key strategic site. The comparative low intensity of development underutilises the site's importance to Ealing Metropolitan Town Centre and provides an opportunity to expand the office and retail offer, and optimise its capacity, in keeping with its central town location and proximity to Ealing Broadway Station.

The site is located within the Ealing Town Centre Conservation Area and presents as a large impermeable block with limited architectural merit apart from a few buildings or facades with group value along The Broadway. Redevelopment provides an opportunity to improve permeability through the site, connecting the station with the town centre, and creating buildings that complement rather than detract from the conservation area, overall improving the quality and vitality of the town centre.

Planning permission 223774FUL was granted in February 2024 for 9-42 The Broadway And 1-4 Haven Place for partial demolition, refurbishment and development to provide between 2 and 21 storey office-led mixed-use scheme with flexible retail, restaurant and cafe uses, a music venue and leisure use at lower levels, with a new area of landscaped public realm and pedestrian route and other associated works. The permission is a revised proposal.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, EAL3 Arcadia.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are office, employment, retail, commercial, restaurant/café, some residential, reprovision of an existing music venue, and other uses suitable for the town centre. The proposed uses including some residential which will help to deliver a successful, sustainable, mixed-use town centre that makes the best use of land.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The site boundary includes the extent of land below the railway line of the existing site allocation EAL3 Arcadia. It includes the site boundary of extant planning permission 223774FUL and the Arcadia area in the western part of the site. Arcadia was added to the Broadway Connection site to enable a more comprehensive

and cohesive redevelopment of this key strategic site.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 80 net units (comprising 84 gross gains and 4 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

The anticipated capacity for this site has been informed and calculated using a combination of sources, including the extant permission 223774FUL covering the eastern part of the site (9-42 The Broadway) which permits no new residential units.

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation, identified commercial space justified by the crucial location of this site within the town centre.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	42	42	0	0	0	0	0	0	0	0	84

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A. For ease of reference this is summarised here:

This advises that bespoke phasing was employed informed by landowner interest and extant permission pertaining to part of the site.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, proximity to a green corridor and the town centre location.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, the site is within Ealing Town Centre CA and adjacent to Haven Green CA and is in close proximity to designated heritage assets including Christ the Saviour (GII*) requiring very sensitive height/design/massing at the western end of the site to mitigate any adverse impacts.

Regarding the green corridor, the allocation requires the provision of public realm, landscaping and greening improvements.

Regarding its town centre, the site is a strategic site which offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include improvements to the local highway; measures to improve permeability and active travel; public realm, landscaping, and greening improvements; and the reprovision of a music venue. In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures to promote active travel will be determined as the strategic site comes forward. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking

provision. In particular, there is an opportunity to align with the council's ambition to significantly improve road safety and the public realm along the Uxbridge Road through Ealing Town Centre, including potential junction realignments and improved provision of cycling facilities. The site will also benefit from the existing and proposed local bus network, including Superloop routes. Additionally, a Travel Plan will be developed to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM55}.

02EA Ealing Broadway Shopping Centre & Crystal House:

a. **the background and how it was identified;**

LPA Response: Ealing Broadway Shopping Centre & Crystal House is a key strategic site located within the heart of Ealing Metropolitan Town Centre. It is currently allocated in the adopted Development Sites DPD 2013 - EAL4 Ealing Broadway Shopping Centre. The site is a large, inward facing urban block with poor permeability, that was opened in 1981 and has suffered from limited investment over the years.

The centre has an inadequate layout and configuration that would benefit from refurbishment and some redevelopment to meet modern retail standards and provide opportunities to improve permeability through the site and connect it better with the rest of Ealing's Town Centre. Further opportunities include creating better designed, greener public spaces, better legibility and increased vitality and viability for the town.

Planning permission 214524FUL was granted in April 2022 relating to International House 7 High Street, Ealing for the creation of a 5th floor to be used as office space (Use Class E(g)(i)); internal courtyard extensions to the second, third and fourth floors; demolition and replacement of the reception and enhancements to the entrance.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, EAL4 Ealing Broadway Shopping Centre

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are retail, employment, residential, community, food and beverages (restaurant/café). The uses including residential will help to deliver a successful, sustainable, mixed-use town centre that makes the best use of land.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The site boundary corresponds to the existing site allocation boundary (EAL4 Broadway Shopping Centre), remaining unchanged. It reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 443 net units (comprising 443 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated net capacity for this site derives from the Tall Building Study Appendix Part 1(EB45A), which indicated that the site could accommodate 651 units. This figure

has been adjusted down reflecting a reduced developable area arising from a separate commercial approval (214524FUL) on part of the site.

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation, identified commercial space justified by the crucial location of this site within the town centre.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	0	88	88	89	89	89	0	0	0	443

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A. For ease of reference this is summarised here:

This advises that bespoke phasing was employed informed by landowner interest. Note the commercial approval has had no bearing on the phasing assumed here. Reflecting the planning status and scale of this allocation, the phasing aligns with scenario 30.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, archaeology, green space designations including a nearby SINC and the town centre location.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, the site is within Ealing Town Centre CA and is in close proximity to a number of designated heritage assets. There is an opportunity to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding archaeology, the site is within an Archaeological Priority Area. Further consultation with either GLAAS or a conservation heritage advisor will be required over any future development proposals.

Regarding its town centre, the site is a strategic site which offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include improvements to the local highway, public realm, and measures to improve permeability and active travel. In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and

which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 3.34% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. In particular, there is an opportunity to align with the council's ambition to significantly improve road safety and the public realm along the Uxbridge Road through Ealing Town Centre, including potential junction realignments and improved provision of cycling facilities. The site will also benefit from the existing and proposed local bus network, including Superloop routes. Additionally, a Travel Plan will be developed to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM56}.

03EA Sandringham Mews

a. **the background and how it was identified;**

LPA Response: Sandringham Mews is currently allocated in the adopted Development Sites DPD 2013 - EAL5 Sandringham Mews. It has an extant planning permission for a mixed-use development including co-living units and town centre uses and a public house (221687FUL).

Sandringham Mews is a key strategic site located in Ealing Town Centre, within the Ealing Town Conservation Area and bordering the Ealing Green Conservation Area. The site is essential to the character of the town centre and its redevelopment will provide the opportunity to maintain and reinforce its town centre offer, supporting the vibrancy of Ealing High Street and improving permeability and reintegration with the established street network.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2} - EAL5 Sandringham Mews.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are residential, retail, employment, leisure and community and public open space. The proposed uses will help to deliver a successful, sustainable, mixed-use town centre that makes the best use of land.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The site boundary remains the same as that of the existing site allocation EAL5 Sandringham Mews with the addition properties on Bond Street that will enable a link through from the site to Bond Street to increase permeability through the site. The site boundary reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: Equating to 216 net conventional units (comprising 220 gross gains and 4 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units where present.

The anticipated capacity for this site has been informed and calculated using a combination of sources, including the extant permission 221687FUL for co-living accommodation which equates to 173 conventional units, and an additional capacity uplift of 43 units for the wider site derived from the Tall Building Study.

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Identified commercial space is focussed on the need for active frontage and the existing commercial provision on site.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	86	87	0	0	0	0	0	0	0	0	0	173
0	0	0	0	0	14	14	15	0	0	0	0	0	0	0	43
0	0	0	0	86	101	14	15	0	0	0	0	0	0	0	216

Each component of the supply (non-conventional pipeline and allocation) has been phased separately, but regard has been had to each in doing this. Bespoke phasing was employed for the extant co-living permission, with this capacity being spread over 2 years informed by the construction management plan which advises a construction programme of 24 months. This capacity was split across years 5 and 6, rather than being assigned only to years 1-5, recognising the possibility for the scheme to be revisited before implementation as part of a more comprehensive development of the site. The uplift capacity derived from the tall building study was assigned to years 6 to 8 reflecting the scale of the proposal and informed by the existing permission on part of the site.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal

with flood risk, heritage, archaeology and the town centre location.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, the site is within Ealing Town Centre CA and is in close proximity to a number of designated heritage assets including Pitzhanger Manor (GI). There is an opportunity to enhance and mitigate any adverse impacts through sensitive design particularly of sensitive views and settings of any heritage assets.

Regarding archaeology, the site is within an Archaeological Priority Area. Further consultation with either GLAAS or a conservation heritage advisor will be required over any future development proposals.

Regarding its town centre, the site is a strategic site which offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include improvements to public realm, measures to improve permeability and active travel, upgrades to the energy and water networks, and flood risk mitigation (surface water).

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and

which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: A site assessment was prepared for this allocation as part of the Level 2 SFRA because the extent of the site area falling with flood zones 2 or 3 exceeded the screening thresholds of 0.49% for fluvial sources and or 7.5% for surface water sources. The screening assessment at appendix A of the Level 2 SFRA (EB97) details the extent of overlap as a percentage of the site area. The extent of the site area falling within flood zone 3a (surface) is 52.13% exceeding the threshold for surface sources and triggering a site assessment. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial). As noted in the response to Q8 Section 2.5.2 of the IIA summarises the application and cumulative findings of the sequential and exception tests. This concluded that the sequential test has been applied appropriately, and for all cases where triggered the exception test (both parts) was passed. A site assessment proforma for this allocation site is included at appendix B of the Level 2 SFRA. This addresses a number of matters including classifying vulnerability, summarising risk, identifying flood defences, assessing risk for each source, describing the flood mechanism, identifying safe entry and exit routes, identifying mitigation measures, and confirming if site will be safe over its lifetime (as per the exception test). Key findings for this allocation can be summarised as follows:

- No fluvial or tidal risk.
- The Exception Test is required for this site as 52.13% of the site area is within Flood Zone 3a (surface water) and the proposed vulnerability classification is 'More vulnerable'.
- Can pass clause B of the exception test
- The site is at high risk of surface water flooding, particularly in the southern and north-western sections, and along the eastern edge. Development should be directed away from the southern, eastern and north-western areas of the site where there is higher risk of surface water flooding.

Reflecting these findings additional text has been added under the contextual considerations section of the allocation text, drawing out those elements of the evidence which may impinge on the design and layout of any future proposal on this site. The measures/design solutions are deemed to be achievable within the context of the wider allocation parameters. For ease of reference the relevant text is set out here:

> *'More than half of the site is at high risk of surface water flooding, particularly in the southern and north-western sections, and along the eastern edge. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.'*

As addressed elsewhere the allocations omit capacities. The capacities employed for the trajectory either reflect permitted or pending schemes or are based on design-based work or capacity calculations which has typically employed conservative assumptions. At a high level this has considered environmental constraints including flood risk, which has moderated the developable area, and will have had a bearing on capacity estimates. As noted above under d) the anticipated capacity for this site is based on a combination of a permitted scheme and additional uplift from the tall buildings study. The permission (221687FUL) was informed by a site-specific flood risk assessment.

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures to promote active travel will be determined as the site comes forward and will follow the Transport Statement and Travel Plan prepared for the extant planning permission. They will take into account the high PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. In particular, there is an opportunity to align with the council's ambition to significantly improve road safety and the public realm along the Uxbridge Road through Ealing Town Centre, including potential junction realignments and improved provision of walking and cycling facilities along Bond Street and High Street. The site will also benefit from the existing and proposed local bus network, including

Superloop routes.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM57}.

04EA Eastern Gateway:

a. **the background and how it was identified;**

LPA Response: Eastern Gateway is a small but strategic site that presents an opportunity to enhance the townscape at the eastern entrance to Ealing Town Centre while making more efficient use of the site through additional floor space and the introduction of different uses appropriate to the excellent PTAL. A small part of the existing allocation has already been redeveloped.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, EAL1 Eastern Gateway.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are residential, retail, employment and community space. The proposed uses will help to deliver a successful, sustainable, mixed-use town centre that makes the best use of land.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The site boundary corresponds to that of the existing site allocation EAL1 Eastern Gateway, excluding the area to the south east (51 Northcote Avenue) which has already been redeveloped.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 9 net units (comprising 9 gross gains and 0 gross losses). As the site is categorised as a 'small site' with a site area smaller than 0.25ha, the capacity figure given here does not feature as an individual site input in the trajectory and is substituted with a single modelled/forecast small sites windfall input. Notwithstanding this position, an individual site capacity figure has been generated to provide an indicative figure for this exercise only.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation, identified commercial space justified by the important location of this site within the town centre.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: As this allocation is categorised as a small site and individual site capacity estimates have been substituted by a single combined input covering the

contribution from all small sites, phasing has not been determined at an individual site level.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage, archaeology, green space designations including a SINC and the town centre location.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding heritage, the site is within Ealing Town Centre CA and is in close proximity to a number of designated heritage assets. Development needs to be sensitive but there is an opportunity to remove unsightly buildings that detract from the character of the conservation area and to improve permeability.

Regarding archaeology, the site is within an Archaeological Priority Area. Further consultation with either GLAAS or a conservation heritage advisor will be required over any future development proposals.

Regarding the various green space designations, the allocation requires the provision of public realm, landscaping and greening improvements.

Regarding its town centre location, the site is an important gateway to the centre and offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public realm improvements and community facilities. In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all

relevant policies of the London Plan including car parking and cycle parking provision. In particular, there is an opportunity to align with the council's ambition to significantly improve road safety and the public realm along the Uxbridge Road through Ealing Town Centre, including potential junction realignments and improved provision of cycling facilities. The site will also benefit from the existing and proposed local bus network, including Superloop routes. Additionally, a Travel Plan will be developed to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM58}.

05EA Perceval House:

a. the background and how it was identified;

LPA Response: Perceval House is Ealing Council's Civic Centre and main offices. The development site includes an office building, a car park and a substation. The extant planning permission granted in December 2021 is for the demolition of existing buildings and a phased redevelopment of the site to provide a mixed-use development comprising housing, office, civic/community uses and flexible non-residential floorspace, with replacement and relocation of the substation. The planning permission has now lapsed and plans for redevelopment of the site have been postponed.

The site was identified as a council owned site that the council would like to see redeveloped.

b. the uses to be permitted and how they are justified;

LPA Response: The uses will be offices, civic/community, residential and flexible non-residential floorspace. Perceval House will be retained and retrofitted and will remain the council's main office and civic centre, and with the introduction of new civic/community uses. The car park will be developed with residential units. The uses will help to deliver a successful, sustainable, mixed-use town centre that makes the best use of land.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The site boundary includes Perceval House, associated car park and substation. The boundary reflects the red line boundary of planning permission 203275FULR3 and the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 188 net units (comprising 188 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated net capacity for this site derives from the Tall Building Study Appendix Part 2(EB45B).

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation,

identified commercial space justified by the important location of this site within the town centre.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	62	63	63	0	0	0	0	0	0	0	188

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of an application, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status (earlier permission now lapsed) and scale of this allocation, capacity has been assigned to future years based on scenario 24.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage, green space designations including a SINC and the town centre location.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding heritage, the site is adjacent to Ealing Town Centre CA and is in close proximity to designated heritage assets including Ealing Town Hall (GII) requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the green corridor, the allocation requires the provision of public realm, landscaping and greening improvements.

Regarding its town centre, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm, landscaping and greening improvements; measures to improve permeability; and social infrastructure. In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects

the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined as proposals come forward. The site's reduction in car parking provision will improve the use of land, and support as many trips as possible to be made by walking, cycling and public transport. The measures will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. In particular, there is an opportunity to align with the council's ambition to significantly improve road safety and the public realm along the Uxbridge Road through Ealing Town Centre, including potential junction realignments and improved provision of cycling facilities. The site will also benefit from the existing and proposed local bus network, including Superloop routes. Additionally, a Travel Plan will be developed, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM59}.

06EA 49 – 69 Uxbridge Road:

a. the background and how it was identified;

LPA Response: The site forms the entrance to the Office Corridor, and the largely outdated buildings sit in contrast to the modern office developments further west. The site is in multiple ownership, including the Metropolitan Police. Redevelopment provides the opportunity to improve the employment offer, together with complementary uses creating an improved public realm, more active frontage, increased footfall and perceived safety. There are opportunities to increase permeability through the site to Mattock Lane and Questors Theatre.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, EAL8, 46 – 69 Uxbridge Road.

b. the uses to be permitted and how they are justified;

LPA Response: A commercial-led mixed-use scheme with some residential and cultural/leisure facilities. It is expected that the commercial element will comprise the majority of the redevelopment in keeping with the Office Corridor and demand for office space. The addition of supporting uses including housing will help to deliver a successful, sustainable, mixed-use town centre that makes the best use of land.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The site boundary reflects that of the existing site allocation. This town centre site is surrounded by extant development. The site boundary reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 142 net units (comprising 146 gross gains and 4 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

The anticipated net capacity for this site derived from the Tall Building Study. The published part 2 study (EB45B) gives a revised gross figure of 129, which would equate to 125 net.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation, identified commercial space justified by the important location of this site within the

town centre, and the important cultural uses to the south.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	0	35	35	36	36	0	0	0	0	142

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 29.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage and the town centre location.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but it abuts Ealing Town Centre CA and is in close proximity to a number of designated heritage assets requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.
Regarding its town centre location, the site offers an opportunity, for example, to

optimise the use of the land and enhance the role of the town centre by boosting footfall and helping to promote a more diverse retail offer.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm improvements, landscaping, measures to improve permeability and active travel, social infrastructure, and flood risk mitigation (surface water). In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified

mitigation will be effective;

LPA Response: A site assessment was prepared for this allocation as part of the Level 2 SFRA because the extent of the site area falling with flood zones 2 or 3 exceeded the screening thresholds of 0.49% for fluvial sources and or 7.5% for surface water sources. The screening assessment at appendix A of the Level 2 SFRA (EB97) details the extent of overlap as a percentage of the site area. The extent of the site area falling within flood zone 3a (surface) is 19.24% exceeding the threshold for surface sources and triggering a site assessment. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial). As noted in the response to Q8 Section 2.5.2 of the IIA summarises the application and cumulative findings of the sequential and exception tests. This concluded that the sequential test has been applied appropriately, and for all cases where triggered the exception test (both parts) was passed. A site assessment proforma for this allocation site is included at appendix B of the Level 2 SFRA. This addresses a number of matters including classifying vulnerability, summarising risk, identifying flood defences, assessing risk for each source, describing the flood mechanism, identifying safe entry and exit routes, identifying mitigation measures, and confirming if site will be safe over its lifetime (as per the exception test). Key findings for this allocation can be summarised as follows:

- No fluvial or tidal risk.
- The Exception Test is required for this site as 19.24% of the site area is within Flood Zone 3a (surface water) and the proposed vulnerability classification is 'More vulnerable'.
- Can pass clause B of the exception test
- The site is at high risk of surface water flooding, particularly in the central and northern sections of the site. Development should be directed away from the northern and central areas of the site where there is higher risk of surface water flooding. Safe egress routes should be directed towards the north east of the site where there is a lower risk of flooding. Ground investigations are required to confirm whether infiltration SuDS are suitable.

Reflecting these findings additional text has been added under the contextual considerations section of the allocation text, drawing out those elements of the evidence which may impinge on the design and layout of any future proposal on this site. The measures/design solutions are deemed to be achievable within the context of the wider allocation parameters. For ease of reference the relevant text is set out here:

> *'The site is at high risk of surface water flooding, particularly in the central and northern sections of the site. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.'*

As addressed elsewhere the allocations omit capacities. The capacities employed for

the trajectory either reflect permitted or pending schemes which have already been informed by site specific FRAs, or as is the case in the instance are based on design-based work or capacity calculations which has typically employed conservative assumptions. At a high level this has considered environmental constraints including flood risk, which has moderated the developable area, and will have had a bearing on capacity estimates.

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. In particular, there is an opportunity to align with the council's ambition to significantly improve road safety and the public realm along the Uxbridge Road through Ealing Town Centre, including potential junction realignments and improved provision of cycling facilities. The site will also benefit from the existing and proposed local bus network, including Superloop routes. Additionally, a Travel Plan will be developed to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM60}.

07EA CP House:

a. **the background and how it was identified;**

LPA Response: CP House is a strategic site located within the Office Corridor. The development site forms a smaller part of the existing site allocation, reflecting the recent redevelopment of buildings to either side of CP House, including the adjacent site to the east which has been commenced but has not completed. There is an extant planning permission for CP House (210030FUL) for the demolition of the existing building and construction of a part 11 and part 13 storey office building, with flexible uses at ground level.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, EAL10 93 – 113 Uxbridge Road

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed use is for offices, which are in keeping with the Office Corridor and demand for office space in this part of Ealing.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary comprises the remaining land available for development from the current site allocation EAL10. It reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: The allocation assumes no residential component as proposed.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation, identified commercial space justified by the important location of this site within the town centre office corridor.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: As noted above, the allocation assumes no provision for residential.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal

with heritage, archaeology, the town centre and regeneration.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding heritage, there are no designated or non-designated heritage assets within the site, but it abuts Ealing Green CA and is in close proximity to a number of designated heritage assets requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding archaeology, the site is within an Archaeological Priority Area. Further consultation with either GLAAS or a conservation heritage advisor will be required over any future development proposals.

Regarding its town centre and strategic area for regeneration location, the site is a strategic site which offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and provide more affordable homes and social community infrastructure.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm improvements, landscaping, greening, and measures to improve permeability and active travel. In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and

which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 0.01% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial). The proposed use is classified as 'less vulnerable' and doesn't trigger the exception test. No provision is made for residential as part of this allocation.

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel are outlined in the Transport Assessment for the extant planning permission and will be taken forward in alignment with other council proposals in the vicinity. They require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. The Transport Assessment identified that as an employment-led site, with employees likely to use public transport, the site can effectively prioritise active and sustainable modes. In particular, there is an opportunity to align with the council's ambition to significantly improve road safety and the public realm along the Uxbridge Road

through Ealing Town Centre, including potential junction realignments and improved provision of cycling facilities. The site will also benefit from the existing and proposed local bus network, including Superloop routes. Additionally, a Travel Plan will be developed to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM61}. In addition, a further amendment proposed as highlighted in the Council's Written Statement on Matter 9, Qs1 – 9 & 11 – 115: Development Sites at Q.28. It is suggested that the proposed use be amended to say: "Office and complementary active frontage uses."

08EA Craven House:

a. **the background and how it was identified;**

LPA Response: The site is allocated in the current Local Plan and located within Ealing's Office Corridor. The u-shaped site wraps around the residential development at Cavalier House, with frontages to Uxbridge Road, St Leonard's Road and Craven Road. The current mix of low-rise residential and commercial uses fronting Craven Road contrast markedly with the large-scale office buildings of Exchange Plaza and Craven House fronting Uxbridge Road. Ealing Fire Station, a designated local heritage asset, is located on the adjacent corner.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, EAL9 Craven House, Bilton House and land to rear of Cavalier House.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed use is for offices and ancillary parking, which is in keeping with the Office Corridor and demand for office space in this part of Ealing. Complementary uses that improve active frontage, footfall and perceived safety will be considered.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The site's boundary is the same as the current allocation, EAL9. The site is surrounded by extant development and the boundary reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: The allocation assumes no residential component as proposed. The site currently accommodates 6 residential units at present which will be lost if the allocation is implemented. This loss is accounted for as part of the Housing Trajectory. Part of the site (Exchange Plaza) is subject to extant and pending permissions. The commenced permission 164805FUL (at Exchange Plaza) is for commercial only and therefore is not assigned to the housing trajectory. This permission appears to have stalled. A new application (241397FUL) for Exchange Plaza was submitted in April 2024 and approved in June 2025 and proposes 504 rooms of student accommodation. This scheme is currently omitted from the housing trajectory as it was submitted after 31/03/2024.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation, identified commercial space justified by the important location of this site within the

town centre office corridor.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: As noted above, the allocation assumes no provision for residential.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage and the town centre location.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding heritage, there are no designated or non-designated heritage assets within the site, but it abuts Ealing Town Centre CA and is in close proximity to a number of designated heritage assets requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding its town centre, the offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and helping to promote a more diverse retail offer.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public realm improvements, landscaping, greening, and measures to improve active travel.
In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the

borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 6.63% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial). The proposed use is classified as 'less vulnerable' and doesn't trigger the exception test.

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all

relevant policies of the London Plan including car parking and cycle parking provision. In particular, there is an opportunity to align with the improvements made as part of the West Ealing Liveable Neighbourhood scheme. The site will also benefit from the existing and proposed local bus network, including the Superloop. Additionally, a Travel Plan will be developed to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM62}.

09EA 66 – 86 Broadway, West Ealing:

a. **the background and how it was identified;**

LPA Response: The site is located in a highly accessible town centre location. It forms an important shopping parade within West Ealing bridging between the finer grain characteristic of the east of the centre and the larger plots and greater height to the west. The bulky and monotonous current built form contributes little to the character of the high street and does not reflect the fine grain of the surrounding area.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, EAL15 66 – 86 Broadway.

b. **the uses to be permitted and how they are justified;**

LPA Response: The site's prime location within West Ealing supports intensification and diversification of uses. The preferred uses for this site are mixed-use - residential-led with commercial/retail on the ground floor in keeping with its town centre location. The mix of uses will help to deliver a successful, sustainable, mixed-use town centre that makes the best use of land.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The site boundary remains the same as that of the current site allocation, EAL15. The site boundary reflects the council's current understanding of the extent of the development opportunity.

It should be noted that there is a discrepancy in the numbering of the properties and land title relating to number 86 Broadway. The property is owned by Pro Management Ltd who contacted the council to say that their property is number 88, not 86. Further discussions with the owner, and our GIS team have revealed that there is an error and numbering, however the mapping is owned by the Crown, and as such, we are unable to rectify the numbering ourselves. The owner has confirmed that they are content with the inclusion of their property as part of the site allocation.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 76 net units (comprising 94 gross gains and 18 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units. These figures also exclude any capacity which has already been completed.

The anticipated gross capacity (94) for this site derives from the Tall Building Study Appendix Part 2(EB45B). This capacity figure subsumes the extant permission 193500FUL for 72-76 Broadway.

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Identified commercial space is limited to the existing ground floor active frontage.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	38	38	0	0	0	0	0	0	0	0	0	76

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed, reflecting planning history. Regardless of whether 193500FUL is implemented, it nonetheless indicates the appetite and ambitions of landowner(s). Capacity is allocated equally across years 5 & 6.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, the town centre and regeneration.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but there are a number of designated heritage assets close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding its town centre and strategic area for regeneration location, the site is a strategic site which offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer and provide more affordable homes and social infrastructure.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public realm improvements, landscaping, greening, and measures to improve active travel. In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 0.9% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed), including its proximity to the Elizabeth Line at West Ealing, and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. In particular, there is an opportunity to align with the improvements made as part of the West Ealing Liveable Neighbourhood scheme. The site will also benefit from the existing and proposed local bus network, including the Superloop, along the Uxbridge Road. Additionally, a Travel Plan will be developed to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM63}.

10EA 59 – 65 Broadway, West Ealing:

a. the background and how it was identified;

LPA Response: 59 – 65 Broadway, is a small, strategic site at the heart of West Ealing, in a highly accessible town centre location. It forms part of a large redevelopment area along the south side of the Broadway which will transform the character of West Ealing centre. The site currently accommodates a supermarket and other retail units.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, EAL16 59 – 119 Broadway and New Ealing House.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses for this site are residential, with retail provision on the ground floor including reprovision of the existing supermarket. The uses will help deliver a successful, sustainable town centre that makes the best use of land, providing much needed housing in an accessible location, and reinforcing the retail provision that is essential to this part of Ealing.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The site boundary comprises a smaller part of the existing site allocation EAL16, being a two-storey single building. The boundary takes into account existing and proposed changes to adjacent land, in particular development site 11EA and reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: As the site is categorised as a 'small site' with a site area smaller than 0.25ha, the capacity figure given here does not feature as an individual site input in the trajectory and is substituted with a single modelled/forecast small sites windfall input. Notwithstanding this position, an individual site capacity figure has been generated to provide an indicative figure for this exercise only.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Identified commercial space is limited to existing supermarket provision.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: As this allocation is categorised as a small site and individual site capacity estimates have been substituted by a single combined input covering the contribution from all small sites, phasing has not been determined at an individual site level.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage and the town centre location.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding heritage, there are no designated or non-designated heritage assets within the site, but there are a number of designated heritage assets close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding its town centre location, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm improvements, landscaping, greening, and measures to improve active travel. In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of

building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed), including its proximity to the Elizabeth Line at West Ealing, and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. In particular, there is an opportunity to align with the improvements made as part of the West Ealing Liveable Neighbourhood scheme. The site will also benefit from the existing and proposed local bus network, including the Superloop. Additionally, a Travel Plan will be developed to

promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM64}.

11EA Sainsbury's & Library, West Ealing:

a. the background and how it was identified;

LPA Response: The site forms part of a large redevelopment area along the south side of the Broadway which will potentially transform the character of West Ealing centre. The site is at the heart of West Ealing, in a highly accessible location, comprising commercial and retail units fronting the Broadway, with a pedestrianized area that provides access to a large supermarket to the rear, a multistorey car park, library and residential units. There are opportunities to increase the number of residential units, the retail offer, and deliver significant improvements to the public realm.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, EAL16 59 – 119 Broadway and New Ealing House.

b. the uses to be permitted and how they are justified;

LPA Response: The uses will include residential units, reprovision of the supermarket, retail, community facilities and sheltered accommodation. Redevelopment is expected to increase the number of residential units on the site, and to reinforce and add to the retail offer in the town centre, providing active frontages especially on Leeland Terrace and allowing for a more legible layout featuring key town centre uses organised around a more functional, welcoming and pedestrian friendly network of public spaces.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: This town centre site comprises a smaller area of the existing site allocation and reflects extant permissions that have already been started or completed within the existing allocated site. The boundary therefore reflects the council's current understanding of the extent of the development opportunity for this site.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 152 net units (comprising 210 gross gains and 58 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units where present.

The anticipated net capacity for this site derives from the Tall Building Study Appendix Part 1(EB45A). This study examined and estimated capacity from a wider site known as Ealing Cluster B encompassing allocations 11EA, 10EA, 12EA, 14EA, 13EA, 09EA and unallocated areas including, 85-97 Broadway, 117-129 Broadway and the Holiday Inn (67-75). Whilst separate figures are given for 09EA and 12EA, the other allocations

and areas have been clustered for the purpose of estimated capacity, generating a single capacity figure of 526. The capacity entry here is intended to relate to 11EA only. The figure of 526 has been adjusted down to account for the removal of 10EA, 13EA, 14EA, 85-97 Broadway, 117-129 Broadway and the Holiday Inn (67-75). This adjustment equates to around 40% of the combined total. The existing sheltered accommodation (O'Grady Court - 58 residential postal addresses) has been accounted for to determine net figure.

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Provision is justified by the importance of this site to West Ealing town centre.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	0	38	38	38	38	0	0	0	0	152

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale (utilising the gross figure) of this allocation, capacity has been assigned to future years based on scenario 29.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage and the town centre location.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding heritage, there are no designated or non-designated heritage assets within the site, but there are a number of designated heritage assets close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding its town centre location, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm improvements, landscaping, greening, measures to improve active travel, and the reprovision of a library, community space, and sheltered housing. In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and

which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 2.56% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed), including its proximity to the Elizabeth Line at West Ealing, and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. In particular, there is an opportunity to align with the improvements made as part of the West Ealing Liveable Neighbourhood scheme. The site will also benefit from the existing and proposed local bus network, including the Superloop. Additionally, a Travel Plan will be developed to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM65}.

12EA Chignell Place, West Ealing:

a. **the background and how it was identified;**

LPA Response: This small, strategic site is located within an accessible and well-connected town centre location along the Uxbridge Road corridor. The site has been the subject of a number of planning applications: 162274FUL, 184490FUL, 215125FUL and 224322FUL. Permission was granted in April 2024 for the demolition of the existing buildings and construction of 13 residential flats (4, 6, 7 & 8 storeys) with commercial space on the ground floor.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, EAL17 59 – 119 Chignell Place.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are for a residential-led mixed use scheme, with retail, commercial, community and leisure uses on the ground floor. Redevelopment will provide an increase in much-needed residential units and intensification of other existing uses appropriate for this town centre site. Redevelopment will also provide the opportunity to improve the design quality of the existing site and adjacent public realm, helping to deliver a more vibrant, successful and sustainable town centre that makes best use of land.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary comprises a smaller area of the existing site allocation and reflects the completion of the adjacent West London Islamic Centre to the north of the site. This town centre site is surrounded by extant development and the site boundary reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 6 net units (comprising 21 gross gains and 15 gross losses). As the site is categorised as a 'small site' with a site area smaller than 0.25ha, the capacity figure given here does not feature as an individual site input in the trajectory and is substituted with a single modelled/forecast small sites windfall input. Notwithstanding this position, an individual site capacity figure has been generated (from the Tall Building Study) to provide an indicative figure for this exercise only. Note this site is also subject to an approved scheme 224322FUL for 13 units and a pending application 184490FUL which proposes 40 units.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Provision is primarily focused on the active frontage.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: As this allocation is categorised as a small site and individual site capacity estimates have been substituted by a single combined input covering the contribution from all small sites, phasing has not been determined at an individual site level.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage, the town centre and regeneration.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding heritage, there are locally listed buildings on site and close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding its town centre and strategic area for regeneration location, the site is a strategic site which offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and provide more affordable homes and social community infrastructure.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public realm improvements, landscaping, greening, and measures to improve active travel. In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Measures will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed), including its proximity to the Elizabeth Line at West Ealing, and will require alignment with all relevant policies of the London

Plan including car parking and cycle parking provision. In particular, there is an opportunity to align with the improvements made as part of the West Ealing Liveable Neighbourhood scheme. The site will also benefit from the existing and proposed local bus network, including the Superloop.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM66}.

13EA 99 – 113 Broadway, West Ealing:

a. **the background and how it was identified;**

LPA Response: This is a small, strategic site located on the southern side of the Broadway in the heart of West Ealing town centre. The site's character is urban with a clear mixed-use composition, including community as well as retail and other commercial uses. St James Avenue runs through the centre of the site, a pedestrianised, planted walkway linking the Broadway to Canberra Road to the south.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, EAL16 59 – 119 Broadway and New Ealing House and was also submitted through the Early Call for Sites.

b. **the uses to be permitted and how they are justified;**

LPA Response: The uses proposed are for a residential-led mixed-use scheme with retail and other appropriate town centre uses on the ground floor. Redevelopment will provide an opportunity to increase much needed housing supply in this highly accessible location as well as reinforcing and adding to the retail and service offers in the town centre. The uses on the ground floor will help to enhance and reactivate the Broadway and St James Avenue, whilst also improving the context on Canberra Road. There will also be opportunities for improvements to the public realm and urban greening in the area.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: This site is surrounded by larger regeneration projects that are recently completed, close to completion, under construction or have recent planning consents. The boundary of this site comprises a smaller area of the existing site allocation and reflects the council's current understanding of the extent of the development opportunity. It also matches the boundary of the site submitted through the Early Call for Sites, which includes the land in between the two buildings (St James Avenue) owned by the council.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 140 net units (comprising 144 gross gains and 4 gross losses). As the site is categorised as a 'small site' with a site area smaller than 0.25ha, the capacity figure given here does not feature as an individual site input in the trajectory and is substituted with a single modelled/forecast small sites windfall input. Notwithstanding this position, an individual site capacity figure has been given here to provide an indicative figure for this exercise only. This total (144 units) reflects the recent permission 240012FUL approved in November 2024.

e. **for commercial development, the estimated floorspace and whether this is**

justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Provision is primarily focused on the active frontage.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: As this allocation is categorised as a small site and individual site capacity estimates have been substituted by a single combined input covering the contribution from all small sites, phasing has not been determined at an individual site level.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage, the town centre and regeneration.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding heritage, there are locally listed buildings close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding its town centre location, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public realm improvements, landscaping, greening, and measures to improve active travel. In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed), including its proximity to the Elizabeth Line at West Ealing and the high level of pedestrian accessibility to the site, and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. In particular, there is an opportunity to align with the improvements made as part of the West Ealing Liveable Neighbourhood scheme. The site will also benefit from the existing and proposed local bus network. Additionally, a Travel Plan will be developed to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM67}. In addition, there is a typographical error in the address cited at Table 2, page 170 of the Plan and it should read 99-113 The Broadway.

14EA – Western Gateway, 131 – 141 Broadway, West Ealing:

a. **the background and how it was identified;**

LPA Response: This small, strategic site is in private ownership, located close to the western end of Ealing Metropolitan Town Centre and it presents an opportunity to be the western gateway to the town centre. It is adjacent to a residential area featuring Victorian semi-detached houses. Low intensity of use and poor layout of buildings on site combined with its prominent use as a car servicing area gives the impression that it sits outside the town centre and forms a poor transition between the residential areas and the high street. The site forms part of a large redevelopment area along the south side of the Broadway which will potentially transform the character of West Ealing town centre. Relevant planning applications include P/2015/6660, 223779FUL (permission granted for nine residential units and E class uses on the ground floor) and 225080FUL (permission granted for 94 co living units and ground floor commercial space).

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, EAL19 59 – 119 Western Gateway.

b. **the uses to be permitted and how they are justified;**

LPA Response: The permitted uses are for residential, with retail provision. It is envisaged that the site has potential to enhance the townscape at the western entrance to the town, while making more efficient use of the site through much needed additional residential units and more floorspace for retail at ground floor level. The proposed uses will help to deliver a successful, sustainable, mixed-use town centre that makes the best use of land.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary matches that of the existing site allocation and reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 73 net units (comprising 74 gross gains and 1 gross losses). As the site is categorised as a 'small site' with a site area smaller than 0.25ha, the capacity figure given here does not feature as an individual site input in the trajectory and is substituted with a single modelled/forecast small sites windfall input. Notwithstanding this position, an individual site capacity figure has been populated here to provide an indicative figure for this exercise only. This total (73 units) reflects the recent (April 2025) permission 235015FUL for a co-living scheme which equates to 73 net conventional units. This pending application also supersedes the earlier permission 225080FUL.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Provision is primarily focused on the active frontage.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: As this allocation is categorised as a small site and individual site capacity estimates have been substituted by a single combined input covering the contribution from all small sites, phasing has not been determined at an individual site level.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage, a nearby SINC, the town centre and non-designated industrial uses.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding heritage, there are locally listed buildings close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the SINC, these sites are separated from the site by built development and road and or river networks so any future development should not pose any adverse impacts.

Regarding its town centre location, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

Regarding non-designated industrial uses, future development must satisfy London Plan and Ealing Local Variation Policy E4.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public realm improvements, landscaping, greening, and measures to improve active travel. In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity

infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation

itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: The specific measures to promote sustainable travel will depend on which scheme is brought forward, but any proposals will be required to align with London Plan policies on car parking and cycle parking provision, and to maximise trips by walking, cycling and public transport. The Transport Statement for the consented scheme 225080FUL proposes car-free residential development, with existing vehicular access and car parking removed.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM68}.

15EA – Waitrose, West Ealing:

a. **the background and how it was identified;**

LPA Response: The site is located in a highly accessible location within a few minutes' walking distance of West Ealing Station on the Elizabeth Line, offering good transport links to central London. The site currently accommodates a large supermarket and extensive associated parking.

An appeal decision, Ref: APP/A5270/W/24/3347877 was recently given in respect of the council's refusal to grant planning permission in respect of application ref: 233076FUL. The main issue for refusal centred around proposed building heights in excess of 13 storeys. The appeal was allowed, and planning permission was granted for the demolition of existing buildings and the phased development of a mixed-use scheme including new homes, a replacement food store and flexible commercial space, with building heights of up to 20 storeys.

The site was identified through the Early Call for Sites and pre application meetings.

b. **the uses to be permitted and how they are justified;**

LPA Response: The uses are for a residential-led mixed-use scheme appropriate to the Town Centre and with reprovision of the supermarket on the ground floor. The development will provide a large number of much needed residential units in a highly accessible location, and reinstatement of the supermarket on the ground floor, with active commercial frontages along all streets, and streetscape and public realm improvements. This will help to deliver a successful, sustainable, mixed-use town centre that makes the best use of land. In addition, the development will contribute to the upgrading of Jacobs Ladder, the footbridge over the railway tracks and Green Man Passage, connecting the site to the Broadway, and improving active travel in the area.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary matches that of the site submitted through the Early Call for Sites. The site boundary reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 318 net units (comprising 318 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated net capacity for this site derived from the Tall Building Study exercise.

This took precent over the then pending application 233076FUL for 428 units (now allowed on appeal). Note the published part 2 study (EB45B) now gives a revised figure of 229. Future updates to the trajectory will reflect the approved capacity (428 units).

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Provision is primarily focused on existing supermarket.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	106	106	106	0	0	0	0	0	0	0	318

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A. For ease of reference this is summarised here:

This advises that bespoke phasing was employed. Whilst the capacity input was informed by the Tall Building Study, regard was had to the then pending scheme when approaching phasing. Specifically, it was noted that an indicative construction programme of 54 months was anticipated, with completion expected in late 2027. Noting the delayed planning process (arising from the appeal), and at the time uncertainty around the outcome, completions were pushed back to years 6 to 8.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, SINC, the town centre and regeneration.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site. The site is within close proximity of two CAs and locally listed buildings requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding its town centre and strategic area for regeneration location, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and provide more affordable homes.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm improvements, landscaping, greening, and measures to improve active travel including the Jacobs Ladder footbridge and Green Man Lane. In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 0.42% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: The measures take into account the PTAL of the site and active and sustainable travel schemes in the vicinity (existing and proposed), including its proximity to the Elizabeth Line at West Ealing and the high level of pedestrian accessibility to the site. The site will align with all relevant policies of the London Plan including car parking and cycle parking provision and will align with the improvements made as part of the West Ealing Liveable Neighbourhood scheme. The site will also benefit from the existing and proposed local bus network. Additionally, a Travel Plan will promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM69}.

16EA – West Ealing Station Approach:

a. **the background and how it was identified;**

LPA Response: The site is situated across from West Ealing Elizabeth Line station, in a highly accessible location within the town centre. The site sits in a residential area as well as being within the town centre boundaries making it particularly vulnerable to inappropriate and overbearing design. There are two relevant planning applications relating to this site, 233190SCE and 233551FUL. The latter is for the demolition of existing buildings and erection of a mixed-use development comprising purpose built managed student accommodation (Sui Generis) and commercial space (Class E) and was granted permission on 21 November 2024. Development on site has begun.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, EAL11 West Ealing Crossrail Station.

b. **the uses to be permitted and how they are justified;**

LPA Response: The permitted uses are for residential and town centre uses in keeping with the site's town centre location and proximity to the West Ealing Elizabeth Line station. The mix of uses will help to deliver a successful, sustainable, mixed-use town centre that makes the best use of land.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The site boundary is the same as that of the current site allocation and reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 179 net units (comprising 179 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated capacity figure for this site reflects the then pending scheme 233551FUL (now approved November 2024) for 448 student bed spaces, which equates to 179 conventional units.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Provision is primarily focused on the active

frontage.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	60	60	59	0	0	0	0	0	0	0	0	179

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A. For ease of reference this is summarised here:

This advises that bespoke phasing was employed. Regard was had to the submitted construction logistic plan, supporting the application (233551FUL). The construction logistics plan indicated that construction work (from demolition through to practical completion) is expected to take approximately 27 months, from the first quarter of 2025. Given the delays in determining the application and noting that pre-commencement conditions have yet to be discharged, completions were pushed back to years 5 to 7.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage, a nearby SINC and Green Corridor, the town centre location and non-designated industrial uses.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding heritage, there are no designated or non-designated heritage assets within the site. The site is within close proximity of two CAs and locally listed buildings requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the SINC and green corridor which runs along the northern boundary of the site, mitigation of any adverse impacts may be required.

Regarding its town centre location, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

Regarding non-designated industrial uses, future development must satisfy London Plan and Ealing Local Variation Policy E4.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public realm improvements, landscaping, greening, and measures to improve active travel. In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: The measures take into account the PTAL of the site and active and sustainable travel schemes in the vicinity (existing and proposed), including its proximity to West Ealing station and the high level of pedestrian accessibility to the site, and the expected low car trip generation of student accommodation. The site will align with all relevant policies of the London Plan including car parking and cycle parking provision and will align with the improvements made as part of the West Ealing Liveable Neighbourhood scheme. The site will also benefit from the existing and proposed local bus network. Additionally, a Travel Plan will promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM70}.

17EA Castle House:

a. **the background and how it was identified;**

LPA Response: This site was submitted through the Early Call for Sites. It comprises Phase 2 of the previously consented residential development granted outline consent in February 2017 under Planning reference: P/2015/4089. Whilst the outline element of the consent, covering the site area now submitted, has since lapsed, it approved a residential development of circa 172 dwellings. The Phase 1 part of the development for 142 units at the rear of the site has now been fully built out.

The site is located just outside Ealing Metropolitan Town Centre and within a few minutes' walk from West Ealing Station on the Elizabeth Line. Its location lends itself to a higher density scheme with an uplift in residential units to the previously consented scheme.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, EAL13 Former BT Telephone Exchange and the Early Call for Sites.

b. **the uses to be permitted and how they are justified;**

LPA Response: The permitted uses are for a residential-led development with some affordable workspace. The additional affordable workspace use takes into account Policy E4 H (i) Local Variation reflecting the most recent use on the site which was commercial office and telephone exchange. The permitted uses will help to deliver a successful, sustainable, mixed-use development that makes the best use of land.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary matches that of the site submitted through the Early Call for Sites and corresponds to boundary of the undeveloped portion of existing Site Allocation EAL13. The boundary reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 172 net units (comprising 172 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present within the geography of the allocation site. These figures also exclude any capacity which has already been completed in phase 1 which sit beyond the allocation site boundary.

The anticipated capacity figure for this site reflects the remaining unimplemented component (phase 2) of the earlier approval P/2015/4089, which has now lapsed. The

early call for sites submission indicated that a fresh scheme for phase 2 will be progressed at some point based on an indicative estimate of 200+ units. Pending the submission of an alternative scheme, the capacity estimate assigned to this allocation is based off the earlier approval for phase 2 (i.e. 172 units).

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Provision of affordable workspace is based upon the current use of the site for commercial purposes.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	57	57	58	0	0	0	0	0	0	0	172

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed, informed by landowner / site promoter input. The early Call for Sites submission estimated delivery between years 6-10.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flooding, heritage and a nearby SINC and Green Corridor.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site. The site is within close proximity of locally listed buildings requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the SINC and the green corridor, these designations are separated from the site by built development.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public realm improvements, landscaping, greening, measures to improve permeability and active travel, and flood risk mitigation (surface water). In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A.

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: A site assessment was prepared for this allocation as part of the Level 2 SFRA because the extent of the site area falling with flood zones 2 or 3 exceeded the screening thresholds of 0.49% for fluvial sources and or 7.5% for surface water sources. The screening assessment at appendix A of the Level 2 SFRA (EB97) details the extent of overlap as a percentage of the site area. The extent of the site area falling within flood zone 3a (surface) is 8.02%, exceeding the threshold for surface sources and triggering a site assessment. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial). As noted in the response to Q8 Section 2.5.2 of the IIA summarises the application and cumulative findings of the sequential and exception tests. This concluded that the sequential test has been applied appropriately, and for all cases where triggered the exception test (both parts) was passed. A site assessment proforma for this allocation site is included at appendix B of the Level 2 SFRA. This addresses a number of matters including classifying vulnerability, summarising risk, identifying flood defences, assessing risk for each source, describing the flood mechanism, identifying safe entry and exit routes, identifying mitigation measures, and confirming if site will be safe over its lifetime (as per the exception test). Key findings for this allocation can be summarised as follows:

- No fluvial or tidal risk.
- The Exception Test is required for this site as 8.02% of the site area is within Flood Zone 3a (surface water) and proposed vulnerability classification is 'More vulnerable'.
- Can pass clause B of the exception test
- The site is at high risk of surface water flooding. Surface water is expected to pool in the south-western, western and eastern sections of the site. Development should be directed away from the south-western, western and eastern areas of the site where there is higher risk of surface water flooding. Safe access and egress routes should be directed to the north-west of the site towards The Avenue where there is a lower risk of flooding. Ground investigations are required to confirm whether infiltration SuDS are suitable. The site is currently a brownfield site with hardstanding areas and little green space. This offers an opportunity to improve flood attenuation through the new development.

Reflecting these findings additional text has been added under the contextual considerations section of the allocation text, drawing out those elements of the evidence which may impinge on the design and layout of any future proposal on this site. The measures/design solutions are deemed to be achievable within the context of the wider allocation parameters. For ease of reference the relevant text is set out here:

> *'The site is at high risk of surface water flooding. Surface water is expected to pool in the south-western, western and eastern sections of the site. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.'*

As noted above under d) the anticipated capacity for this site is based on an earlier approved permission, which itself had been informed by a site-specific flood risk assessment.

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: The measures take into account the PTAL of the site and active and sustainable travel schemes in the vicinity (existing and proposed), including its proximity to the Elizabeth Line at West Ealing. The second phase of development will align with all relevant policies of the London Plan including car parking and cycle parking provision and will align with the improvements made as part of the West Ealing Liveable Neighbourhood scheme. The site will also benefit from the existing and proposed local bus network. Additionally, a Travel Plan will promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable

housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM71}.

18EA Access House & T Mohan:

a. **the background and how it was identified;**

LPA Response: The site is located in an accessible position close to the Ealing Metropolitan Town Centre and within a three minutes' walk from West Ealing Station on the Elizabeth Line. It currently accommodates a self-storage warehouse, offices and a builders' yard, next to a railway line and predominantly residential surroundings.

The landing point of Jacobs' Ladder, a well-used pedestrian footbridge crossing the railway track is located within the site. Redevelopment of the site will facilitate the much-needed upgrading of the crossing, which is currently in a poor condition and will contribute to improved access, safety and permeability through the site and across the railway tracks.

The site is currently at high risk of surface water flooding and redevelopment will enable a design that can better mitigate this risk.

The site was identified through the London SHLAA 2017.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are for more employment-dense industrial uses that are suitable for co-locating with residential uses. This mix of uses will deliver much needed industrial and employment floorspace and residential units, helping to deliver a successful, sustainable development that makes the best use of land.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary encompasses the self-storage warehouse, offices, builders' yard and an electricity distribution site and reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 79 net units (comprising 79 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool. Further detail about this tool is explained on page 14 of EB73.

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: N/A

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	26	26	27	0	0	0	0	0	0	79

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 28.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, a nearby SINC and green corridor and non-designated industrial uses.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site. The site is within close proximity of locally listed buildings requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the SINC and green corridor which runs along the southern boundary of the site, mitigation of any adverse impacts may be required.

Regarding non-designated industrial uses, future development must satisfy London Plan and Ealing Local Variation Policy E4.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include landscaping and public realm improvements, flood risk mitigation (surface water), and improvements to the Jacobs Ladder footbridge to improve access and permeability through the site and across the railway. In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: The site is proposed for mixed use intensification of the existing industrial use. This should provide for the retention of a net uplift of industrial provision.

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: A site assessment was prepared for this allocation as part of the Level 2 SFRA because the extent of the site area falling with flood zones 2 or 3 exceeded the screening thresholds of 0.49% for fluvial sources and or 7.5% for surface water sources. The screening assessment at appendix A of the Level 2 SFRA (EB97) details the extent of overlap as a percentage of the site area. The extent of the site area falling within flood zone 3a (surface) is 23.63% exceeding the threshold for surface sources and triggering a site assessment. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial). As noted in the response to Q8 Section 2.5.2 of the IIA summarises the application and cumulative findings of the sequential and exception tests. This concluded that the sequential test has been applied appropriately, and for all cases where triggered the exception test (both parts) was passed. A site assessment proforma for this allocation site is included at appendix B of the Level 2 SFRA. This addresses a number of matters including classifying vulnerability, summarising risk, identifying flood defences, assessing risk for each source, describing the flood mechanism, identifying safe entry and exit routes, identifying mitigation measures, and confirming if site will be safe over its lifetime (as per the exception test). Key findings for this allocation can be summarised as follows:

- No fluvial or tidal risk.
- The Exception Test is required for this site as 23.63% of the site area is within Flood Zone 3a (surface water) and the proposed vulnerability classification is 'More vulnerable'.
- Can pass clause B of the exception test
- The site is at high risk of surface water flooding, particularly along the southern edge and the western part of site. There are also areas of ponding in the eastern part of the site. Safe access and egress routes should be directed to the north-west of the site towards Drayton Green where there is a lower risk of flooding.

- Development should be directed away from the southern, western and eastern areas of the site where there is higher risk of surface water flooding.

Reflecting these findings additional text has been added under the contextual considerations section of the allocation text, drawing out those elements of the evidence which may impinge on the design and layout of any future proposal on this site. The measures/design solutions are deemed to be achievable within the context of the wider allocation parameters. For ease of reference the relevant text is set out here:

> *'The site is at high risk of surface water flooding, particularly along the southern edge and the western part of site. There are also areas of ponding in the eastern part of the site. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.'*

As addressed elsewhere the allocations omit capacities. The capacities employed for the trajectory either reflect permitted or pending schemes which have already been informed by site specific FRAs, or as is the case in the instance are based on design-based work or capacity calculations which has typically employed conservative assumptions. At a high level this has considered environmental constraints including flood risk, which has moderated the developable area, and will have had a bearing on capacity estimates.

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures will be brought forward during the planning process, and will take into account the PTAL of the site and active and sustainable travel schemes in the vicinity (existing and proposed), including its proximity to the Elizabeth Line at West Ealing and the opportunity to improve access through upgrading the Jacob's Ladder footbridge. The site will align with all relevant policies of the London Plan including car parking and cycle parking provision and will align with the improvements made as part of the West Ealing Liveable Neighbourhood scheme, e.g., the lighting provision on Jacob's Ladder. The site will also benefit from the existing and proposed local bus network. Additionally, a Travel Plan will promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM72}.

19EA Gurnell Leisure Centre:

a. **the background and how it was identified;**

LPA Response: Gurnell Leisure Centre has an Olympic-sized swimming pool and is located within Metropolitan Open Land. It is home to a number of sporting and recreational facilities including a children's adventure playground, a skatepark, BMX track, playing fields used for football and cricket. The existing leisure centre has reached the end of its useful life and is currently closed.

Planning application 201695FUL was refused permission. A more recent application, 241706OUTR3, was granted permission in March 2025. The consented scheme is for the construction of a replacement leisure centre and residential development.

This is a council owned site that the council has identified for redevelopment in order to bring the swimming pool and other facilities back into use.

b. **the uses to be permitted and how they are justified;**

LPA Response: The uses are for a new replacement leisure centre and associated outdoor leisure facilities and enabling residential development. The leisure centre will allow for the replacement of the Olympic-sized swimming pool, one of two in London that meets the specifications for a competition pool that will be a regional facility. The enabling residential development is required to help fund the pool, limited to the amount absolutely necessary to financially secure the replacement leisure centre. Development on open space will be limited and should seek to minimise the impact on the openness of the site.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary includes the leisure centre, associated parking and Metropolitan Open Space/Public Open Space up to the River Brent, and Argyle Road to the east. The boundary includes the Open Space area which accommodates outdoor sports, leisure and recreational uses and facilities, and reflects the area that will be redeveloped or enhanced.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 295 net units (comprising 295 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated capacity for this site reflects the proposed number of units sought under the then pending application 241706OUT (now approved March 2025).

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: Commercial provision is based upon the requirement for the reinstatement of the existing leisure centre use.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	147	148	0	0	0	0	0	0	0	0	0	295

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed informed by the pending scheme (now approved). It is noted that this a hybrid application with outline consent only being sought for the residential component at present. Information submitted with the application indicates that works are expected to commence in early 2026 and complete in early 2028. Demolition works commenced in March 2025. Noting the outline status of the residential component, more conservative assumptions have been made for residential completions, with capacity being assigned to years 5 & 6.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, archaeology, green and blue space designations including a SINC and regeneration.

h. **how the relevant design criteria are justified, and whether they appropriately**

address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding archaeology, the site is within an Archaeological Priority Area. Further consultation with either GLAAS or a conservation heritage advisor will be required over any future development proposals.

Regarding the green and blue space designations, the built footprint of any future development is to principally focus on the existing previously developed land. Design principles include measures to incorporate a comprehensive package of open space enhancements, outdoor sporting facilities, landscaping and biodiversity.

Regarding its strategic area for regeneration location, site offers an opportunity, for example, to optimise the use of the land and provide more affordable homes and reprovide important sporting and recreational facilities.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include the reprovision of the leisure centre and other sporting and recreational facilities, open space enhancements. and flood risk mitigation (surface water). In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: A site assessment was prepared for this allocation as part of the Level 2 SFRA because the extent of the site area falling with flood zones 2 or 3 exceeded the screening thresholds of 0.49% for fluvial sources and or 7.5% for surface water sources. The screening assessment at appendix A of the Level 2 SFRA (EB97) details the extent of overlap as a percentage of the site area. The extent of the site falling within flood zone 2 (fluvial) is 93.88%. The extent falling within flood zone 3a (fluvial) is 76.48%. The extent falling with flood zone 3b (fluvial) is 22.4%. The extent of the site area falling within flood zone 3a (surface) is 6.13%. As noted in the response to Q8 Section 2.5.2 of the IIA summarises the application and cumulative findings of the sequential and exception tests. This concluded that the sequential test has been applied appropriately, and for all cases where triggered the exception test (both parts) was passed. A site assessment proforma for this allocation site is included at appendix B of the Level 2 SFRA. This addresses a number of matters including classifying vulnerability, summarising risk, identifying flood defences, assessing risk for each source, describing the flood mechanism, identifying safe entry and exit routes, identifying mitigation measures, and confirming if site will be safe over its lifetime (as per the exception test). Key findings for this allocation can be summarised as follows:

- The site is at risk from fluvial flooding from the River Brent, which flows around the northern, eastern, and western edges of the wider site in a westerly direction.
- Safe access / egress routes should be directed towards Ruislip Road East to the south of the site where less fluvial flooding is predicted.
- Only water compatible or essential uses (subject to the Exception Test) are permitted in FZ3b (the north-western corner of the wider site).
- Self-contained basement dwellings and bedrooms are not permitted in FZ3a (the majority of the site).
- The site is currently at risk of surface water flooding, particularly in the south-eastern and north-western areas of the site.
- The site is located within 8m of a Main River or 5m of an Ordinary Watercourse.

- The Exception Test is required for this site as areas of the site are within Flood Zone 3a (fluvial and surface water) and the proposed vulnerability classification is 'More vulnerable'.
- Can pass clause B of the exception test.

Reflecting these findings additional text has been added under the contextual considerations section of the allocation text, drawing out those elements of the evidence which may impinge on the design and layout of any future proposal on this site. The measures/design solutions are deemed to be achievable within the context of the wider allocation parameters. For ease of reference the relevant text is set out here:

> *'River Brent is prone to flooding so any new building and landscape proposals will need to sufficiently mitigate the effects of on-site flooding and not contribute to further risk downstream. The site is also at high risk of surface water flooding. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment, and any future site-specific flood risk assessment required to support a planning application.'*

As addressed elsewhere the allocations omit capacities. The capacity employed in this instance reflects the approved scheme, which itself has been the subject of a site-specific flood risk assessment.

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: The site takes account of prioritising active and sustainable travel through measures including reduced car parking provision, provision of extensive active and passive EV charging, cycle parking, and improving access for walking and cycling to the residential development on the site. Measures will also take account of the Ealing Cycle Network Plan and other active travel schemes in the vicinity. The site is well served by local bus routes and provision has been made for coach parking, to ensure as few car trips as possible are generated.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM73}.

20EA Downhurst Residential Care Home:

a. **the background and how it was identified;**

LPA Response: The site is privately owned and currently accommodates a residential care home and serviced apartments. It is located in north Ealing within a well-established residential area.

Planning permission 174077FUL was granted in October 2017 for extensions to existing buildings to accommodate nine ensuite rooms and an additional storey to accommodate two self-contained residential flats which has not been implemented. The eastern part of the site was granted planning permission (ref:232370FUL) in August 2023 for the construction of 3 new buildings comprising 4 residential units. Work on the consented scheme has now started.

The site was identified through London SHLAA 2017.

b. **the uses to be permitted and how they are justified;**

LPA Response: The permitted uses are for care home and residential units. This is to enable retention of the care home use and provide much needed additional residential units through intensification of the current use.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The developer's representation at Regulation 19 Council proposed changes to the site allocation to take into account the planning permissions on the site. The council has noted that work on the consented area is already underway. It is therefore suggested that an amendment is made the site boundary to omit this area as proposed in the Schedule of Suggested Modifications {S24 - reference SMM74} and Schedule of Suggested Modifications Appendix B {S24b}.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 15 net units (comprising 15 gross gains and 0 gross losses). As the site is categorised as a 'small site' with a site area smaller than 0.25ha, the capacity figure given here does not feature as an individual site input in the trajectory and is substituted with a single modelled/forecast small sites windfall input. Notwithstanding this position, an individual site capacity figure has been generated using the R19 calculator tool to provide an indicative figure for this exercise only. Note further adjustments were then made to the initial capacity output (19 gross gains, 6 losses and 13 net) to reflect the amended site boundary removing Louisa Chilton Court (which benefits from an implemented permission for 4 units). The allocation assumes retention of the existing nursing accommodation (comprising 24 bed spaces).

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: N/A

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: As this allocation is categorised as a small site and individual site capacity estimates have been substituted by a single combined input covering the contribution from all small sites, phasing has not been determined at an individual site level.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding heritage, there are no designated or non-designated heritage assets within the site. The site is within close proximity of two CAs and locally listed buildings requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include landscaping and greening improvements. In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the

borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions *per se* were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: The Transport Statement for the consented scheme takes into account its reasonable walking and cycling distance (1km) from Ealing Broadway station. The site is well served by the local bus network, and there is good availability of Car Club bays in the vicinity. Cycle parking is provided in accordance with London Plan policy. The site is expected to generate a small number of daily trips, of which a high proportion will be made by walking, cycling and public transport.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: Yes, in relation to the site boundary as highlighted in the Council's response to Initial Questions dated 10 January 2025 [EX3] and the Council's Written Statement on Matter 9, Qs1 – 9 & 11 – 115: Development Sites at Q.39. It is suggested that further amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM74}.

21EA Former Barclays Sports Ground:

a. the background and how it was identified;

LPA Response: The privately owned site is located within a well-established residential area north of Ealing Metropolitan Town Centre. Ada Lovelace High School, located to the south of the site was built on part of the original Former Barclays Sports Ground.

The site contains a disused part two and part three storey sports pavilion/club house and maintenance workshop facility with groundman accommodation above. The site operated as a privately owned company sports ground until its closure in 2000. Since then, it has remained unused and is inaccessible to the public. The site is designated as Metropolitan Open Space and Community Open Space.

The site was identified through a pre application meeting.

b. the uses to be permitted and how they are justified;

LPA Response: The permitted uses are for a sports/leisure-led scheme with a small amount of enabling residential development in the north east corner on Previously Developed Land. The residential development should be limited to the amount absolutely necessary to secure the replacement of the sport and leisure facilities, and community access to the wider sports ground.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary includes the whole of the former sports ground with proposed development limited to the area of Previously Developed Land in the north east. The whole site has been included so as to ensure that access to the site will be secured for the community.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 97 net units (comprising 97 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool, which assumed development around the existing previously developed land. Further detail about this tool is explained on page 14 of EB73.

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: N/A

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	32	32	33	0	0	0	0	0	0	0	97

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed. Whilst recognising that the site is being actively promoted as part of the Local Plan process, the site nonetheless does not benefit from an extant permission, nor have any applications been submitted. In the Council's view the site does not qualify as deliverable at present. Adopting a cautious approach the Council have assigned capacity to years 6 to 8.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage and green space designations including a MOL.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site. The site is within close proximity of two CAs and locally listed buildings requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the various green space designations, the site is located within an area of deficiency in access to small / local / pocket and district parks. Design principles require any built development to be focused around the existing previously developed land and minimise encroachment into usable green space so as to minimise the impact on MOL openness and function, including maintenance of views north / south through the site. Given that the Community Open Space is not currently in active use, the quantum of facilitating residential development should be no more than is necessary to financially secure the delivery of sports facilities within the allocation site and across the wider sports ground.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include the provision of sport, leisure, and recreational facilities. In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit

mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 0.03% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote sustainable travel will be brought forward during the planning process. It will be a key consideration to ensure good walking and cycling access to the sports and leisure facilities, including connecting to active travel schemes in the vicinity and the Ealing Cycle Network Plan, and provision of good quality cycle parking. The site is well served by the local bus network, and is located close to North Ealing station, which will support a high proportion of trips to be made by sustainable modes.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values

generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM75}.

22EA 96 Queens Drive, Tel Service Centre & 33 Hanger Lane:

a. **the background and how it was identified;**

LPA Response: The site is located on the A406 (North Circular Road), with an entrance to the site on Queens Drive and between two railway lines. The site benefits from a high level of accessibility with North Ealing Underground Station just a couple of minutes' walk, and buses that run along the North Circular Road and Madeley Road. The surrounding area is a mix of residential and commercial, lacking the tight urban grain that is evident in other part of the borough. The site currently accommodates offices, a telephone exchange and fleet distribution centre for British Telecom.

The site was identified through the London SHLAA 2017 and Call for Sites.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are for residential and industrial/employment. It is envisaged that industrial uses should be retained with redevelopment providing an uplift in industrial/employment floorspace, and that residential uses could be successfully co-located on the site. The mixed use will help to deliver a successful, sustainable development that makes the best use of land and maximises its locational advantages.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: At Reg 18, the site boundary included the telephone exchange and fleet distribution centre (EA32). The addition of 33 Hangar Lane came as a result of the Call for Sites, when the site adjoining EA32 was submitted. Adding 33 Hanger Lane to EA32 provides a larger site, enabling better access and a more comprehensive development.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 142 net units (comprising 142 gross gains and 0 gross losses). Please note that whilst this figure derives from the Housing Trajectory (EB73B) it differs from the total published there. The figure carried forward in the trajectory was adjusted to reflect the proposed modification (S24 - SMM76) to the 'proposed' use' under the allocation. This modification introduces multiple outcomes in respect of uses for this site. As the trajectory is principally interpreted at an aggregated level, the capacity was halved to reflect the probability of one of two scenarios being delivered.

The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The initial capacity figure for this site has been calculated using the R19 capacity calculator tool, which assumed the full redevelopment of the site. Further detail about this tool is explained on page 14 of EB73.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: N/A.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	17	18	18	18	0	0	0	0	0	0	71

As noted in response to d) above the totals given here are moderated to account for probability. Whilst these are not indicative of the likely residential yield were a mixed scheme pursued, the distribution of capacity remains valid.

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed. Whilst recognising that the site is vacant and is being actively promoted as part of the Local Plan process, the site nonetheless does not benefit from an extant permission, nor have any applications been submitted. Whilst the landowner has indicated that delivery could occur within years 1 to 5, in the Council's view the site does not qualify as deliverable at present. Adopting a cautious approach the Council have assigned capacity to years 6 to 9.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal

with flood risk, heritage, a nearby SINC and Green Corridor and non-designated industrial uses.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but it lies within the setting of N. Ealing Station (GII) requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the various green space designations, the site is located within an area of deficiency in access to small / local / pocket and district parks. The SINC and green corridor border the site to the east, south, and west requiring mitigation of any adverse impacts.

Regarding non-designated industrial uses, future development must satisfy London Plan and Ealing Local Variation Policy E4.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public realm, landscaping, and highway improvements. In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and

which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: The allocation requires any loss of non-designated industrial provision to be tested against the sequential approach set out in Policy LV E4

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 3.05% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures will be brought forward during the planning process and will take into account the PTAL of the site and active and sustainable travel schemes in the vicinity (existing and proposed), including its proximity to North Ealing station and the local bus routes serving the site. The site will align with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of**

development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM76}.

23EA Old Actonians Sports Ground:

a. **the background and how it was identified;**

LPA Response: The site is owned by the council and is a well-used and valued community sports ground accommodating a range of outdoor and indoor sporting activities. Current facilities on the site include an outdoor rugby, cricket and football pitch, cricket nets, netball and tennis courts as well as a pavilion, and indoor sports spaces for squash, badminton, table tennis and boxing. The pavilion, changing rooms, club building and indoor sports spaces located in the southern half of the site are in poor condition and in need of upgrade or replacement.

The site is designated as Community Open Space and is located within a predominantly residential area in the south of the borough on the border with LB Hounslow and neighbouring Gunnersbury Park.

This is a council owned site that the council has identified for enabling redevelopment.

b. **the uses to be permitted and how they are justified;**

LPA Response: The uses proposed are for sport and leisure space and facilities with enabling residential development. The facilities are in great need of replacement or refurbishment and some enabling residential development is required to finance this objective. The quantum of residential development will be limited to the amount absolutely necessary to financially secure the delivery of the replacement facilities and development will be limited to Previously Development Land and the amount on open space limited. It is anticipated that an improved configuration of the existing developed land could increase the amount of open space.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary includes the whole Old Actonians Sports Ground, associated buildings and Barons Pond, and reflects the council's understanding of the extent of the development opportunity. Barons Pond has been included so that the council can explore potential opportunities for managing this site and broaden access to it.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 20 net units (comprising 20 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated capacity for this site has been informed by earlier pre-app work for this site, which aligned with the principles now established through the allocation.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: N/A

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	10	10	0	0	0	0	0	0	0	0	20

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed, informed club input. Noting the earlier pre-app activity and modest expectations of the club, delivery could occur at pace, although contingent on club finances. Capacity is assigned to years 6 & 7.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage and green space designations including a Community Open Space, SINC and Green Corridor.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but there are a number of designated heritage assets close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the various green space designations, the site is located within an area of deficiency in access to small / local / pocket parks. Design principles seek to limit the quantum of residential development to the amount absolutely necessary to financially secure the delivery of the outdoor sports facilities, limit the amount of development on open space and locate development along the southern edge of the site. Given Barons Pond's SINC designation, the allocation seeks to ensure any new built development is designed sensitively to minimise any potential impact on ecology.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include the provision of sport, leisure, and recreational facilities as well as greening and biodiversity measures.
In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 5.02% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures will be brought forward during the planning process and will take into account the PTAL of the site and active and sustainable travel schemes in the vicinity (existing and proposed), to maximise access to the sports and leisure facilities by active and sustainable modes. The site will align with all relevant policies of the London Plan including car parking and cycle parking provision. The site will also benefit from the existing and proposed local bus network. Additionally, a Travel Plan will promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable

housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM77}.

24EA Wickes, South Ealing:

a. the background and how it was identified;

LPA Response: The site currently accommodates a large builders' merchants with associated parking, situated in south Ealing. The site has frontages on both Olive Road and South Ealing Road and is within minutes from South Ealing Underground Station. The surrounding area is a mix of residential and retail along South Ealing Road. There is substantial opportunity to improve the surrounding area with active frontages and public realm and landscaping improvements.

The site was identified through the London SHLAA 2017.

b. the uses to be permitted and how they are justified;

LPA Response: A mixed use residential led development is proposed with retention of commercial uses. The mix of uses and intensification will help to deliver a successful, sustainable development that makes the best use of land.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary includes the area currently occupied by the builders' merchants and associated car park. It reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 162 net units (comprising 162 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool, which assumed the full redevelopment of the site. Further detail about this tool is explained on page 14 of EB73.

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Identified commercial space is limited to active frontage.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	0	40	40	41	41	0	0	0	0	162

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that in the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 29.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with a nearby SINC and green corridor and the town centre location.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regards the SINC and Green Corridor, these are separated from the site by built development and road/rail networks making adverse impacts unlikely.

Regarding its town centre location, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public realm and landscaping improvements, and measures to improve permeability and active travel. In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures will be brought forward during the planning process and will take into account the PTAL of the site and active and sustainable travel schemes in the vicinity (existing and proposed), including its proximity to South Ealing station. The site will align with all relevant policies of the London Plan including car parking and cycle parking provision. The site will also benefit from the local bus network. Additionally, a Travel Plan will promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM78}.

25EA Travis Perkins, Popes Lane:

a. **the background and how it was identified;**

LPA Response: The site is located in South Ealing, in the middle of a residential area and surrounded on two sides by South Ealing Cemetery. The site is currently occupied by a builders' merchant and associated parking.

The site was identified through the London SHLAA 2017.

b. **the uses to be permitted and how they are justified;**

LPA Response: The site is proposed for residential development, which would be a more appropriate and sustainable type of development for its residential surroundings and the cemetery, providing much needed homes for the borough.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary matches the extent of the existing builders' merchant, which is constrained by housing on one side and South Ealing Cemetery on its eastern and southern boundaries. This reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 87 net units (comprising 87 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool, which assumed the full redevelopment of this site. Further detail about this tool is explained on page 14 of EB73.

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: N/A

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	29	29	29	0	0	0	0	0	0	87

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 28.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage and nearby SINC.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding heritage, there are no designated or non-designated heritage assets within the site, but there are a number of designated heritage assets close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the SINC, which runs along the southern and eastern boundary of the site, mitigation of any adverse impacts may be required, and the design principles include a requirement for careful landscape design.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include landscaping and greening improvements and biodiversity measures. In the wider Ealing area, the IDP identified the need to reinforce/upgrade the electricity infrastructure. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy**

approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures will be brought forward during the planning process and will take into account the PTAL of the site and active and sustainable travel schemes in the vicinity (existing and proposed), including its proximity to South Ealing station. The site will align with all relevant policies of the London Plan including car parking and cycle parking provision. The site will also benefit from the local bus network. Additionally, a Travel Plan will promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No.

01GR Greenford Hall, Methodist Church, Police Station & Clinic:

a. the background and how it was identified;

LPA Response: The site comprises a mix of buildings and spaces in both private and council ownership, located within Greenford District Centre and adjacent to Ravenor Park. The site includes the Grade II Listed Greenford War Memorial set within Oldfield Lane Open Space Pocket Park, and the former Police Station, Greenford Library and Greenford Hall which are locally listed buildings. The site is slightly set back from The Broadway, Greenford's main shopping area, and opposite a parade of shops on Oldfield Lane South. The site holds a significant opportunity for a heritage-led, high-quality mixed-use scheme with a significantly improved public realm and better access to Ravenor Park.

Planning application ref: 223478FUL for the construction of two buildings, ranging in height from part 4 storeys to 6 storeys, to provide 36 residential units following demolition of the former Police Station, was refused in May 2025. Reasons for refusal included overdevelopment of the site; the development of a small part in the centre of the proposed site allocation would impact on the delivery of the wider aspirations of the site allocation as a whole and fails to include the desired mix of uses; the proposals fail to preserve nor conserve the special architectural or historic interest of civic and community buildings and its merits do not outweigh the visual amenity and heritage impacts.

The site was identified through the London SHLAA 2017.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are for a mix of residential, leisure, health, community and place of worship. The ambition for this site is to have a heritage-led masterplan to ensure uses, buildings and spaces are repurposed or redeveloped and integrated into the town centre, whilst enhancing the site's historic setting, and improving public facilities and the public realm.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary incorporates all the buildings within the council's ownership and those privately owned that form a hub, reflecting the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 6 net units (comprising 5 gross gains and 1 gross loss). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the

anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units where present.

The anticipated net capacity for this site derives from the Tall Building Study Appendix Part 2(EB45B), with an adjustment made to account for the loss of one existing unit. This study assumed that a modest amount of new residential accommodation could delivered on part of the allocation site (referenced as block A GR01), achieved via the conversion of the police station with some infill to the rear.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: N/A

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	2	3	0	0	0	0	0	0	0	5

In the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 27. It is noted that the earlier pending 223478FUL referenced in the trajectory notes for this allocation was refused in May 2025.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage, a nearby SINC and the town centre location.

h. how the relevant design criteria are justified, and whether they appropriately

address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding heritage, there are no designated or non-designated heritage assets within the site, but there are a number of designated heritage assets close by. The allocation proposes a heritage led master plan approach to ensure any future development is cohesive and sensitive.

Regards the SINC and Green Corridor, these are separated from the site by built development and road networks making adverse impacts unlikely.

Regarding its town centre location, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public realm improvements within Greenford town centre, the continuation of the cycle path south of Greenford Road to the town centre, and the creation of a green link to Ravenor Park.

The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land

value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM83}.

02GR Greenford Broadway Car Park:

a. the background and how it was identified;

LPA Response: The site is located within the heart of Greenford District Centre. The majority of the site comprises a surface level car park with a couple of privately owned buildings and a shop to the north-west of the site. There is an opportunity to capitalise on the site's town centre location to introduce a mixed-use development that makes better use of the land, with a public realm strategy to improve the corner of Greenford Road and The Broadway, creating a new public space as a focal point for the town centre and better permeability through the site with linkages to site O1GR. A masterplan approach for the site would be favoured.

Following the Reg 19 consultation, Tesco's, who own buildings within the proposed allocation, and a supermarket with associated car park adjacent to the site, requested that their site be included as a new site allocation. Following discussions, a Statement of Common Ground between the council and Tesco's has been agreed, with the purpose of amending the boundary of 02GR Greenford Broadway Car Park to include the Tesco's site.

The majority of the site is council-owned and has been identified for redevelopment by the council.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are residential, retail and community. The proposed uses, including housing, will help to deliver a successful, sustainable, mixed-use town centre that makes the best use of land.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The initial boundary included the car park owned by the council and buildings owned by Tesco's, the shop on the corner of Oldfield Lane South and Stanhope Park Road, and the corner of The Broadway and Greenford Road. The inclusion of the shop is because of the potential to make better use of the land through intensification, and create more active frontages, particularly on Stanhope Park Road where the current building presents a large brand-band brick wall. The inclusion of the corner of The Broadway and Greenford Road will provide opportunities to improve this important location at the heart of Greenford town centre.

The inclusion of Tesco's supermarket and car park on Greenford Road as part of the site allocation is discussed in a) above, and a modification to amend the boundary in this regard has been suggested - see {S24} Schedule of Suggested Modifications.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 154 net units (comprising 156 gross gains and 2 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units where present.

The anticipated net capacity for this site derives from the Tall Building Study Appendix Part 2(EB45B), with adjustments made to account for the loss of existing units. The capacity input is based off the 'alternative option' presented in this study for GR02, incorporating Tesco and the bank.

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation. The town centre is well occupied and there is commercial interest in retail expansion, including at the Tesco site adjacent to the allocation.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	0	38	38	39	39	0	0	0	0	154

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has

been assigned to future years based on scenario 29.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage and the town centre location.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding heritage, there are no designated or non-designated heritage assets within the site, but there are a number of designated heritage assets close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding its town centre location, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include highways and public realm improvements, and landscaping and greening measures. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study

used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range

of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: Yes, in relation to the site boundary as highlighted in the Council's response to Initial Questions dated 10 January 2025 [EX3] and the Council's Written Statement on Matter 9, Qs1 – 9 & 11 – 115: Development Sites at Q.50. It is suggested that further amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM84}.

03GR 370 – 388 Oldfield Lane North:

a. the background and how it was identified;

LPA Response: A small, strategic site, located opposite Greenford Underground Station and close to the transport (bus) hub in Rockware Avenue. The site is characterised by its prominent location, by the shopping parade's modernist style and proximity to Greenford Station. It is also within walking distance of Westway Retail centre, Paradise Fields and the Grand Union Canal.

The shopping parade, a secondary shop frontage, and especially the public realm is of poor quality, lacking in street trees and greenery. The site presents an excellent opportunity to increase the number of residential units and retail offer through intensification whilst improving the public realm.

The site was identified and recommended by an Ealing officer.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are for residential with retail on the ground floor. This will help to deliver a successful, sustainable, mixed-use development in a highly accessible location that makes the best use of land.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary includes the shopping parade and residential units, reflecting the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 21 net units (comprising 39 gross gains and 18 gross losses). As the site is categorised as a 'small site' with a site area smaller than 0.25ha, the capacity figure given here does not feature as an individual site input in the trajectory and is substituted with a single modelled/forecast small sites windfall input. Notwithstanding this position, an individual site capacity figure has been generated to provide an indicative figure for this exercise only.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is residential-led. Identified commercial space is limited to the ground floor and also serves the requirements of active frontage.

f. evidence of the expected timescale and rate of development, and how

assumptions are justified and deliverable;

LPA Response: As this allocation is categorised as a small site and individual site capacity estimates have been substituted by a single combined input covering the contribution from all small sites, phasing has not been determined at an individual site level.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage and nearby SINC.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but there are designated heritage assets close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regards the SINC, the site is likely to have limited indirect or no effect on as its features could likely be retained, or effects mitigated.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include lighting and public realm improvements to the bridge underpass to improve the safety of passage to/from the site; improvements to Oldfield Lane North crossing; and public realm improvements including around Greenford Station. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of

building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No.

04GR Westway Cross:

a. the background and how it was identified;

LPA Response: The site is currently occupied by large retail units and associated car parking, which comprises about half the site, and a MacDonalds Restaurant close to the entrance to the site. The retail part of the site is designated as a neighbourhood centre. It is located within walking distance of Greenford Underground Station and buses on Rockware Avenue, and across from Paradise Fields, Grand Union Canal, and Horsenden Hill. The development of the site with retail took place in the1990s, with a legal agreement that the north-west area should be retained for car parking for visitors to Paradise Field.

The shopping centre originally accommodated comparison goods only. More recently, the offer has expanded to include more food and beverage outlets and supermarkets. A masterplan approach to redevelopment is recommended.

The site was identified and recommended by an Ealing officer.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are for residential, retail/commercial and office and public green space. The proposed uses will provide much needed homes and a better retail/commercial/employment offer that makes more intensive and efficient use of land, and improved pedestrian access to Paradise Fields.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary includes the whole of the retail park and car parking area, reflecting the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 759 net units (comprising 759 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated net capacity for this site derives from the Tall Building Study Appendix Part 2(EB45B). This study gave an indicative site capacity of 1139 units for this allocation. As delivery is anticipated to extend beyond the plan period, only a portion (759 units) is expected to be delivered by 2038/39. The remaining 380 units is assumed to deliver in 2039/40 to 2040/41.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". The existing centre is successful and well-occupied; development should build on planned population growth and provide active frontage.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	0	0	0	0	0	189	190	190	190	759

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed, informed by the existing operation, the retail operator's future ambitions for the site to maintain and enhance the retail offer, and the scale of the future opportunity. The trajectory assumes that approximately two thirds of the anticipated capacity could be delivered before the end of the plan period. The remaining third is expected to deliver after 2039/40.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, green space designations including MOL, HS2 safeguarding and the town centre location.

h. how the relevant design criteria are justified, and whether they appropriately

address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but there are a number of designated heritage assets close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding green space designations, it is likely to have limited indirect or no effect on the MOL, SINC and Green Corridor as features could likely be retained, or effects mitigated.

Regarding its town centre location, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm, landscaping, and greening improvements as well as measures to improve active travel. There is potential for district heating. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit

mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 3.34% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial). It does trigger exception test, but not site assessment as below threshold.

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over

the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM85}.

However, to ensure better clarity and ensure the policy is effective, a further suggested amendment is proposed under contextual considerations as follows:

> "*Development proposals should consider nearby features of ecological value (MOL, SINC and Green Corridor) and ensure the need for sensitive treatment along the northern edge of the site*."

05GR Former Greenwich School of Management:

a. **the background and how it was identified;**

LPA Response: The site forms part of existing site allocation OIS7 Greenford Green, being the undeveloped part at the northern end of the allocated site. The education facility was formerly used by the Greenwich School of Management and the site includes an office building occupied by Ferrero with an associated multi-storey car park on the remainder of the site. The site is located within walking distance of Sudbury Hill Station, Greenford Station and Westway Retail Park, and nearby Strategic Industrial Locations.

An employment-led masterplan approach to a high-density mixed-use development is preferred, that explores the opportunities for building retention, retrofit, infill and redevelopment.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, OIS7 Greenford Green.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are residential, educational, office and community. The mix of uses will safeguard the existing employment uses and provide much needed new homes.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary corresponds to the undeveloped portion of existing site allocation OIS7 Greenford Green and reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 272 net units (comprising 272 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated net capacity for this site derives from the Tall Building Study Appendix Part 2(EB45B).

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation, but any commercial components should support the main employment, education and residential uses.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	0	54	54	54	55	55	0	0	0	272

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 30.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage and nearby SINC and Green Corridor.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but there are a number of designated heritage assets close by including the Glaxo Building (GII) requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the green designations, a small part of a green corridor is within the site's eastern boundary and with appropriate mitigation this could be retained and protected.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include social infrastructure and active travel measures. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2**

-Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 0.17% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM86}.

06GR Smiths Farm:

a. the background and how it was identified;

LPA Response: The site is located south of the A40 between Northala Fields and Marnham Fields, adjacent to Green Belt, a Green Corridor and Public Open Space. The site has been used for commercial purposes for the last 25 years. Most recent uses include a lorry park, workshops, storage of plant and construction equipment. The farmhouse and outbuildings are locally listed and include a barn in a poor state of repair.

The Green Belt and Metropolitan Open Land Review Stage 2, February 2024 {EB95} recommended that Smiths Farm be removed from Green Belt, citing its existing use, severance of Green Belt with no connecting route through the site, and unlikelihood of the site reverting to Green Belt even in the absence of proposals going ahead.

Planning application 22144FUL for 189 residential units (a mix of flats and houses) and conversion of existing farmhouse and barns to provide a café/commercial unit was refused in November 2022 on grounds including that it would constitute inappropriate development in the Green Belt and the design, siting, density and scale represented overdevelopment of the site.

Planning application 231604FUL for 220 residential units and the conversion of existing farmhouse and barns to provide a café/commercial unit and improved public access between Northala Fields and Marnham Fields, was approved in May 2024. The application was granted on the grounds that a range of very special circumstances applied which, on balance, outweighed any harm to the Green Belt. These included: the land is Previously Developed Land; over 50% affordable housing, provision of 0.5ha new, publicly accessible open space, improvements to public accessibility and connections between Northala Fields, Marnham Fields and the Grand Union Canal; refurbishment and reuse of Locally Listed Heritage Assets on the site; and remediation of a contaminated and unsightly site within the Green Belt.

The site was identified through the London SHLAA 2017 and extant planning permission.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are for residential with café/commercial and employment, and public space/access. The uses will improve the site and provide much needed housing for the borough, including affordable homes and large family homes. The conversion of the existing farmhouse and barns to café/commercial will provide employment in the area (mitigating any loss from the current operations in line with London Plan Policy E4) and increase the hospitality offer to people vising Northala Fields and Marnham Fields. The provision of a new public space with pedestrian/cycle route through the site will enhance the amenity offer and improve active travel options in the area.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary corresponds to that of the extant planning permission. However, in the Reg 19 document the site boundary was drawn incorrectly. It is suggested that modifications be made to the boundary amending it to correspond to the extant planning permission, along with some minor amendments to reflect the landownership and correct Green Belt boundary. The suggested amendments can be found in the Schedule of Suggested Modifications {S24 - reference SMM87 and SMM154} and Schedule of Suggested Modifications Appendix B {S24b}.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 217 net units (comprising 220 gross gains and 3 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units where present.

The anticipated capacity for this site reflected the pending scheme 231604FUL (now approved May 2024) for 220 units. Under this scheme the existing farmhouse building is to be retained but converted to a café. Two existing flats are also to be demolished.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led" any mixed uses should support this and meet the needs of the surrounding population which is generally undersupplied by walk to commercial uses.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	29	66	122	0	0	0	0	0	0	0	0	0	0	217

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed informed by the then pending scheme (now approved). Various pre-commencement conditions have been discharged in relation to this scheme including details of the construction management plan (243107CND). This submission confirms that the scheme is to be built in 4 phases, which is reflected in the phasing programme detailed in the table above. For phase 1 (32 units) it gives an indicative completion date of March 2027. For phase 2 (66 units) it advises of an indicative completion date of June 2027. Phase 3 (44 units) is expected to complete by May 2028. Phase 4 comprises 78 units with completion expected by July 2028.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with green space designations including a nearby Green Belt, non-designated industrial uses and regeneration.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regards green space designations, the allocation highlights scope to make improvements to the Green Belt and measures to improve access across Kensington Road.

Regarding non-designated industrial uses, future development must satisfy London Plan and Ealing Local Variation Policy E4.

Regarding its strategic area for regeneration location, the site offers an opportunity, for example, to optimise the use of the land, provide more affordable homes and improve permeability.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include improvements to Green Belt and measures to improve access across Kensington Road. The precise

infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 0.37% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation

itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: The Transport Statement for the approved scheme for the site includes measures to promote active travel that take into account the PTAL of the site, active travel schemes in the vicinity (existing and proposed), and require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. A Section 106 contribution for public transport enhancement agreed with the previous application to cover permanent yellow line restrictions, mitigations and a CPZ review will also apply to this application. Other 'hard' measures will include a large quantity of cycle storage and on-site car club spaces.

The proposed development warrants a Travel Plan and low car development measures will be put in place to encourage residents to use more sustainable modes of travel. The Travel Plan produced for the approved scheme supports the measures and the behaviour change required for modal shift, with identification of various methods to address barriers to using sustainable transport.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: Yes, in relation to the site boundary as highlighted in the Council's response to Initial Questions dated 10 January 2025 [EX3] and the Council's Written Statement on Matter 9, Qs1 – 9 & 11 – 115: Development Sites at Q.54. It is suggested that further amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM87}.

01HA Land to the front of Ealing Hospital:

a. the background and how it was identified;

LPA Response: The site forms part of the wider Ealing Hospital, which includes an accident and emergency department, the Three Bridges medium secure unit, Meadow House hospice and other departments and facilities. St Bernards Hospital to the east of Ealing Hospital has recently been redeveloped with high rise high density residential development (St Bernard's Gate).

The site is located at the northern end of Ealing Hospital on the Uxbridge Road, a dual carriage way. The eastern edge of the site abuts Fitzherbert Walk along the Brent River which forms part of London's Capital Ring. The river and riverside walk are designated Metropolitan Open Land and encompassed by St Marks Church and Canal Conservation Area with Churchill Conservation Area and Brent Meadow/Connolly Meadow to the north of the site.

The hospital is within a 15-minute walk of Hanwell Station on the Elizabeth Line and there are bus routes that run along the Uxbridge Road with one terminating at the hospital.

The site was identified by the council and NHS property.

b. the uses to be permitted and how they are justified;

LPA Response: The uses are residential and community with some essential parking provision for the hospital. This part of the site is underutilised, with large parking areas and internal roads. Redevelopment will reprovide much needed affordable key worker and assisted housing alongside the provision of new residential and community uses. Active frontages along the northern edge of the site will improve (perceptions of) safety and revitalise this important public facility. There will also be improved pedestrian access through the site and access to the Capital Ring route, with public realm improvements.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary has been agreed with NHS property and reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 383 net units (comprising 383 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated net capacity for this site derives from the Tall Building Study Appendix Part 2(EB45B).

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: N/A

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	0	76	76	77	77	77	0	0	0	383

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 30.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, green space designations including MOL and SINC and regeneration.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but there are a number of designated heritage assets close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regards green space designations, the vast majority of the site is not within the Green Belt or MOL. However, there is a small area at the east of the site designated as MOL. It is considered that its loss could be avoided in future development. it is likely to have limited indirect or no effect on SINC and Green Corridor as features could likely be retained or effects mitigated.

Regarding its strategic area for regeneration location, the site offers an opportunity, for example, to optimise the use of the land, provide more affordable homes and social infrastructure.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include the provision of green links to the Capital Ring/Metropolitan Open Land (Fitzherbert Walk/River Brent); public realm, landscaping, and greening improvements; flood risk mitigation (fluvial and surface water); and health facilities. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study

used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was prepared for this allocation as part of the Level 2 SFRA because the extent of the site area falling with flood zones 2 or 3 exceeded the screening thresholds of 0.49% for fluvial sources. The screening assessment at appendix A of the Level 2 SFRA (EB97) details the extent of overlap as a percentage of the site area. The extent of the site area falling within flood zone 2 (fluvial) is 28.56% exceeding the threshold. The extent of the site falling within flood zone 3a (surface) is 3.54% below the respective threshold. No part of the site falls within flood zone 3a (fluvial) or flood zone 3b (fluvial). As noted in the response to Q8 Section 2.5.2 of the IIA summarises the application and cumulative findings of the sequential and exception tests. This concluded that the sequential test has been applied appropriately, and for all cases where triggered the exception test (both parts) was passed. A site assessment proforma for this allocation site is included at appendix B of the Level 2 SFRA. This addresses a number of matters including classifying vulnerability, summarising risk, identifying flood defences, assessing risk for each source, describing the flood mechanism, identifying safe entry and exit routes, identifying mitigation measures, and confirming if site will be safe over its lifetime (as per the exception test). Key findings for this allocation can be summarised as follows:

- The site is at risk from fluvial flooding from the River Brent, which flows to the east of the site in a southerly direction (FZ2 28.56%).
- The site is currently at risk of surface water flooding along the northern, eastern and southern boundaries of the site.
- Self-contained basement dwellings and bedrooms are not permitted in FZ3a.
- The Exception Test is required for this site as areas of the site are within Flood Zone 3a (surface water) and the proposed vulnerability classification is 'More vulnerable'.

Reflecting these findings additional text has been added under the contextual considerations section of the allocation text, drawing out those elements of the evidence which may impinge on the design and layout of any future proposal on this site. The measures/design solutions are deemed to be achievable within the context

of the wider allocation parameters. For ease of reference the relevant text is set out here:

> *'The site is at risk of both fluvial and surface water flooding. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment, and any future site-specific flood risk assessment triggered by an application.'*

As addressed elsewhere the allocations omit capacities. The capacities employed for the trajectory either reflect permitted or pending schemes which have already been informed by site specific FRAs, or as is the case in the instance are based on design-based work or capacity calculations which has typically employed conservative assumptions. At a high level this has considered environmental constraints including flood risk, which has moderated the developable area, and will have had a bearing on capacity estimates.

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and

potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM88}.

02HA Gray's Garage:

a. the background and how it was identified;

LPA Response: The site located along the Uxbridge Road within Hanwell District Centre, in a highly accessible location - a 10-minute walk from Hanwell Station on the Elizabeth Line and with several bus routes along the Uxbridge Road. The site currently accommodates an auto repair shop and car wash in single and two storey buildings. The main building is set back from the Uxbridge Road and there are cars for sale parked in the front part of the site. The area is characterised by mainly two and three storey buildings on the Uxbridge Road, with shops and services on the ground floor and residential above, and two storey terraced housing to the south.

The current layout of the site creates a poor relationship with the Uxbridge Road and the buildings are in poor condition, offering an opportunity to improve enhance the street scene, creating a more active frontage and maximising the site's potential to provide high quality much needed homes and retaining the business function of the site.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, HAN2 144 – 164 Uxbridge Road and 1 – 3 Westminster Terrace

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are for residential with commercial/retail space on the ground floor and public open space. The mix of uses will help to deliver a successful, sustainable, mixed-use town centre that makes the best use of land.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The site's boundary corresponds to the area of the existing site allocation, HAN2 that has not been developed. The site boundary reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 14 net units (comprising 23 gross gains and 9 gross losses). As the site is categorised as a 'small site' with a site area smaller than 0.25ha, the capacity figure given here does not feature as an individual site input in the trajectory and is substituted with a single modelled/forecast small sites windfall input. Notwithstanding this position, an individual site capacity figure has been populated here to provide an indicative figure for this exercise only.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". The site is within the town centre and should be supported by mixed uses on the ground floor.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: As this allocation is categorised as a small site and individual site capacity estimates have been substituted by a single combined input covering the contribution from all small sites, phasing has not been determined at an individual site level.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, archaeology, a nearby SINC, non-designated industrial uses and the town centre location.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but there are a number of designated heritage assets close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the SINC, any development proposals are likely to have limited indirect or no effect on SINC or effects can be mitigated.

Regarding archaeology, the site is within an Archaeological Priority Area. Further consultation with either GLAAS or a conservation heritage advisor will be required over any future development proposals.

Regarding non-designated industrial uses, future development must satisfy London Plan and Ealing Local Variation Policy E4.

Regarding its town centre location, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm improvements and measures to improve permeability and active travel. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: The current use is quasi-industrial; however, the site does not provide meaningful industrial capacity for reuse.

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 2.88% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift. The proximity of the Elizabeth line station with frequent rail service will be a major factor in encouraging sustainable travel.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No.

03HA George Street Car Park:

a. the background and how it was identified;

LPA Response: George Street Car Park is a surface level car park. It is a small strategic site owned by the council located within Hanwell District Centre, just off the Uxbridge Road, a historic arterial road leading into and out of inner London. The site is highly accessible, within a 10-minute walk from Hanwell Station on the Elizabeth Line, and with several bus routes running along the Uxbridge Road.

The site is surrounded by two and three storey mews and terraced housing and a new 6 storey flatted development to the north east. Hanwell Clock Tower Conservation Area adjoins the site to the north and east.

This is a council owned site that the council has identified for redevelopment.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed use is for residential led mixed use development which will provide much-needed homes for the area.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The site boundary corresponds to the area covered by George Street Car Park and its access from the Uxbridge Road. The site boundary reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 16 net units (comprising 16 gross gains and 0 gross losses). As the site is categorised as a 'small site' with a site area smaller than 0.25ha, the capacity figure given here does not feature as an individual site input in the trajectory and is substituted with a single modelled/forecast small sites windfall input. Notwithstanding this position, an individual site capacity figure has been generated to provide an indicative figure for this exercise only.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". The site is within the town centre and should be supported by mixed uses on the ground floor.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: As this allocation is categorised as a small site and individual site capacity estimates have been substituted by a single combined input covering the contribution from all small sites, phasing has not been determined at an individual site level.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage and the town centre location.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but it is adjacent or close by two conservation areas and a locally listed building requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding its town centre location, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include improved public realm and landscaping, measures to improve permeability and active travel, and flood risk mitigation (surface water). The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this

information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was prepared for this allocation as part of the Level 2 SFRA because the extent of the site area falling with flood zones 2 or 3 exceeded the screening thresholds of 0.49% for fluvial sources and or 7.5% for surface water sources. The screening assessment at appendix A of the Level 2 SFRA (EB97) details the extent of overlap as a percentage of the site area. The extent of the site area falling within flood zone 3a (surface) is 27.27% exceeding the threshold for surface sources and triggering a site assessment. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial). As noted in the response to Q8 Section 2.5.2 of the IIA summarises the application and cumulative findings of the sequential and exception tests. This concluded that the sequential test has been applied appropriately, and for all cases where triggered the exception test (both parts) was passed. A site assessment proforma for this allocation site is included at appendix B of the Level 2 SFRA. This addresses a number of matters including classifying vulnerability, summarising risk, identifying flood defences, assessing risk for each source, describing the flood mechanism, identifying safe entry and exit routes, identifying mitigation measures, and confirming if site will be safe over its lifetime (as per the exception test). Key findings for this allocation can be summarised as follows:

- No fluvial or tidal risk.
- The Exception Test is required for this site as 27.27% of the site area is within Flood Zone 3a (surface water) and the proposed vulnerability classification is 'More vulnerable'.
- Can pass clause B of the exception test.

- The site is at high risk of surface water flooding, particularly the northern and south-western sections.
- Safe access and egress routes should be directed to the south east of the site towards Wilmot Place where there is a lower risk of flooding.
- Development should be directed away from the northern and south-western areas of the site where there is higher risk of surface water flooding.

Reflecting these findings additional text has been added under the contextual considerations section of the allocation text, drawing out those elements of the evidence which may impinge on the design and layout of any future proposal on this site. The measures/design solutions are deemed to be achievable within the context of the wider allocation parameters. For ease of reference the relevant text is set out here:

> *'The site is at high risk of surface water flooding, particularly the northern and south-western sections. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.'*

As addressed elsewhere the allocations omit capacities. The capacities employed for the trajectory either reflect permitted or pending schemes which have already been informed by site specific FRAs, or as is the case in the instance are based on design-based work or capacity calculations which has typically employed conservative assumptions. At a high level this has considered environmental constraints including flood risk, which has moderated the developable area, and will have had a bearing on capacity estimates.

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift. The proximity of the Elizabeth line station with frequent rail service will be a

major factor in encouraging sustainable travel.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No.

04HA Site of Lidl and discount store:

a. the background and how it was identified;

LPA Response: The site is located within Hanwell District Centre. It currently accommodates a supermarket and discount store with surface car parking covering half the site. The site has a wide access from the Uxbridge Road and is within walking distance from Hanwell Station on the Elizabeth Line and several bus routes that run along the Uxbridge Road.

The entrance to the site has a poor public realm and aspirations for the site include public realm improvements. To the south of the site are gardens belonging to two storey houses, with two storey housing on the western boundary. To the east and north east is the proposed site allocation 05HA Marshall Site, Golds Gym & Garages on Montague Avenue, and to the north on the Uxbridge Road are retail units with flats above.

The site was identified through the London SHLAA 2017.

b. the uses to be permitted and how they are justified;

LPA Response: The uses include residential, retail, food and beverage, and community. Half the current site is covered by a surface car park which does not make best use of the land. The mix of uses will allow for the reprovision of the supermarket and much needed residential units alongside café or restaurant uses. Reconfiguration of the site would provide the opportunity to upgrade the public realm on the Uxbridge Road creating a strong perimeter to the site, and public open space within the site lined to internal pedestrian streets, with landscaping and greening improvements.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary corresponds to the area covered by the existing supermarket, discount store and car park. The site boundary reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 157 net units (comprising 159 gross gains and 2 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this and the neighbouring (05HA) 'Large' site allocation geography to our future supply. The figures presented here represent the combined total for both adjacent sites 04HA and 05HA. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units where present.

The anticipated capacity figure for this site is derived from the Tall Building Study

exercise (EB45A) which assessed 04HA and 05HA as a single cluster site. This source took precedent over the extant and live permissions relating to 05HA. These include the extant scheme 172913FUL for 57 units which has commenced but stalled, and the pending scheme 215983FUL for 43 units.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". The site is home to one of the key retail uses in the town centre and there is interest in redevelopment and expansion.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for these sites (04HA and 05HA combined), as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	39	39	39	40	0	0	0	0	0	0	157

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed. Whilst recognising that part of 05HA benefits from a secured permission, works on this part of the site have stalled. The remaining part of 05HA is subject to a live application. The Lidl store (04HA) is undergoing refurbishment presently. Despite recent planning activity, the Council has adopted a more cautious approach assigning capacity beyond the first five years.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage and the town centre location.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding heritage, there are no designated or non-designated heritage assets within the site, but it is adjacent or close by two conservation areas and a locally listed building requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding its town centre location, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm, landscaping, and greening improvements, and measures to improve active travel. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is

justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: The Transport Statement for the extant scheme (172913FUL) takes into account the 'very good' PTAL of the site, active travel schemes in the vicinity (existing and proposed) and aligns with relevant policies of the London Plan including car parking and cycle parking provision.

The proposed development will be car-free other than 2 disabled parking spaces, in accordance with policies for sustainable development. The developer is further willing to provide financial contributions to support implementation of CPZ locations in the local area. The proximity of the Elizabeth line station with frequent rail service will be a major factor in encouraging sustainable travel.

A Travel Plan supports the measures to promote sustainable travel to the site and the behaviour change required for modal shift. A future Commercial Travel Plan will be developed once the occupiers are known that will accord with the principles of the full Travel Plan.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over

the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM89}.

05HA Marshall Site, Gold's Gym & Garages on Montague Avenue:

a. the background and how it was identified;

LPA Response: This is a prominent site located at the entrance to Hanwell Town Centre on the Uxbridge Road and extending to Montague Avenue to the south. The site is adjacent to locally listed Church of Our Lady and St Joseph and close to Hanwell Cemeteries Conservation Area.

Current uses on the site include retail, leisure, professional services, education, a dentist, car dealership, and residential accommodation. The retail units on the Uxbridge Road are two storey with first floor set back and long backyards. Golds Gym is housed in a three-storey building with a small amount of parking at the front of the building limited to those using the gym. The buildings present a weak and unattractive building frontage to the busy Uxbridge Road, with poor public realm and inactive frontage.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, HAN1 64 – 88 Uxbridge Road.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses include residential, retail/commercial, leisure and community uses including housing will help to deliver a successful, sustainable, mixed-use town centre that makes the best use of land.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The site boundary includes the land included in the existing site allocation HAN1 64 – 88 Uxbridge Road and has been extended to include Gold's Gym and the garages on Montague Avenue to provide a more coherent and comprehensive development. The site boundary reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 157 net units (comprising 159 gross gains and 2 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this and the neighbouring (04HA) 'Large' site allocation geography to our future supply. The figures presented here represent the combined total for both adjacent sites 04HA and 05HA. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units where present.

The anticipated capacity figure for this site is derived from the Tall Building Study exercise (EB45A) which assessed 04HA and 05HA as a single cluster site. This source took precedent over the extant and live permissions relating to 05HA. These include the extant scheme 172913FUL for 57 units which has commenced but stalled, and the pending scheme 215983FUL for 43 units.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". The site is within the town centre and should be supported by mixed uses on the ground floor.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for these sites (04HA and 05HA combined), as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	39	39	39	40	0	0	0	0	0	0	157

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed. Whilst recognising that part of 05HA benefits from a secured permission, works on this part of the site have stalled. The remaining part of 05HA is subject to a live application. The Lidl store (04HA) is undergoing refurbishment presently. Despite recent planning activity, the Council has adopted a more cautious approach assigning capacity beyond the first five years.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage and the town centre location.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding heritage, there are no designated or non-designated heritage assets within the site, but it is adjacent or close by two conservation areas, a designated heritage asset St Mellitus Church (GII) and a locally listed building requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding its town centre location, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm and landscaping improvements, as well as improvements to permeability and active travel. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is

justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: The Transport Statement for the pending scheme (215983FUL) takes into account the PTAL of the site, active travel schemes in the vicinity (existing and proposed) and aligns with relevant policies of the London Plan including car parking and cycle parking provision.

The proposed residential development is to be car-free, with the exception of 2 disabled parking spaces. The proximity of the Elizabeth line station with frequent rail service will be a major factor in encouraging sustainable travel.

The proposed development falls below the threshold for a full Travel Plan, but the developer has offered a Residents' Welcome Pack as part of the development to communicate relevant information related to sustainable travel to residents. The development will provide appropriate infrastructure to encourage sustainable travel such as cycle parking and will also provide information and incentives where practicable to support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over

the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM90}.

06HA Tile Depot & Lambourn Close:

a. the background and how it was identified;

LPA Response: The site is in private and council ownership. It is located on the Boston Road, adjacent and opposite primary and secondary shopping frontages. Boston Road is a main road (A3002) with bus routes and characterised by a mix of retail, commercial, light industrial and residential uses, linking Hanwell Town Centre with Boston Manor Underground Station to the south, on the boundary with the London Borough of Hounslow.

Most of the site comprises council owned Lambourne Close, a housing estate which includes a block of modular units used as temporary accommodation. To the south of the site is Trumpers Way Local Strategic Industrial Site (LSIS). The site is within easy reach of Elthorne Waterside Park and the Grand Union Canal.

The site was identified and recommended by an Ealing officer.

b. the uses to be permitted and how they are justified;

LPA Response: The uses proposed are for residential and retail, with the reprovision of affordable and assisted housing. The site has the potential to increase the number of residential units and provide additional housing above retail on the ground floor along Boston Road. There are further opportunities to provide an active frontage on Boston Road and improve the public realm, and pedestrian access through the site.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The site boundary corresponds to the area covered by Lambourne Close and the Tile Depot, reflecting the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 32 net units (comprising 128 gross gains and 96 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool. Further detail about this tool is explained on page 14 of EB73.

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation; provision reflects existing need and interest in on the site.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	0	8	8	8	8	0	0	0	0	32

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale (informed by the gross figure) of this allocation, capacity has been assigned to future years based on scenario 29.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, archaeology and a nearby SINC.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding archaeology, the site is within an Archaeological Priority Area. Further

consultation with either GLAAS or a conservation heritage advisor will be required over any future development proposals.

Regarding the SINC, they are separated from the site by built development and road networks making adverse impacts unlikely.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm, greening and landscaping improvements, as well as improvements to pedestrian links. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 6.21% below the threshold. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No.

07HA Copley Close Estate:

a. the background and how it was identified;

LPA Response: The site was identified by the council as a Major Intervention Estate requiring refurbishment/remodelling and selection demolition/redevelopment to address poor physical design factors including the estate's poor relationship to the surrounding area and a poor public realm. The estate regeneration is subject to an agree masterplan (PP/2013/2127).

Copley Close is a long, narrow estate bounded by the railway line to the east and the established neighbourhoods of the Cuckoo Estate Conservation Area to the west. It sits to the east of Greenford and north of Hanwell Town Centre and is largely isolated with public transport being limited to a single bus service, and Castle Bar Park Station to the north and Drayton Green Station to the south, both of which are on the Greenford Branch Line (two trains per hour, Monday to Saturday).

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, OIS6 Copley Close Estate, and through the London SHLAA 2017.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are residential, with health and retail. The proposed uses will allow for optimising the delivery of renewed affordable housing and will provide some retail and health/community facilities which are needed due to the site's relative isolation and distance from Hanwell District Centre. Redevelopment will also improve the public realm, including opportunities for prioritising pedestrians and cyclists.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary corresponds to the remaining phases of the masterplan for Copley Close and reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 347 net units (comprising 700 gross gains and 353 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

This allocation forms part of a wider estate renewal project which has been ongoing for a number of years now. The original masterplan permission (PP/2013/2127) encompassed seven phases covering a wider area. Phases 1, 2, 3, 4 & 6 have been

implemented. Works on phase 5 have yet to commence, although this phase as currently permitted involves refurbishment only (i.e. no uplift). Phase 5 sits outside of the allocation boundary. Phase 7 (contributing a net uplift of 2 units under the original masterplan permission) remains unimplemented and forms the focus of this allocation. As per the permitted scheme phase 7 'Greater Copley' comprises 6 new-build homes, plus the refurbishment of 333 flats at Monmouth, Oxford, Paddington, Pembroke, Radnor, Shropshire, Somerset and Stafford Courts. The existing plans for both phases 7 & 5 are however now subject to an ongoing viability review, which may result in a revised planning application. An initial high level feasibility study undertaken for phase 7 only indicated that an alternative scheme could yield circa 700 units (gross). With the inclusion phase 5 this figure may be refined further. Pending the completion of the viability review, the capacity figure given here is drawn from the earlier feasibility study for phase 7 only.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is primarily residential with supporting facilities including retail and health.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	69	69	69	70	70	0	0	0	0	0	347

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed informed by recent and ongoing feasibility work. The timing of build out reflects the gross total rather than the net figure. Delivery is assumed beyond the next five years.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, a nearby SINC and regeneration.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but there is a conservation area adjacent to the site requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the SINC and green corridor which runs along the northern and eastern boundaries of the site requiring mitigation of any adverse impacts.

Regarding its strategic area for regeneration location, the site offers an opportunity, for example, to optimise the use of the land, provide more affordable homes and social infrastructure.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm, greening, and landscaping improvements; active travel improvements; improvements to green links; and health facilities. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and

which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 4.31% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: The Transport Assessment for the masterplan permission (PP/2013/2127) takes into account the poor to average PTAL of the site and active travel schemes in the vicinity (existing and proposed) and aligns with relevant policies of the London Plan including car parking and enhanced cycle parking provision. The development provides enhanced north-south pedestrian and cycle connections to Ruislip Road East. This will reduce the walking distance to the bus stops and encourage the use of sustainable modes of transport. Further pedestrian improvements include implementation of the Legible London scheme and upgrades to pedestrian crossing points to improve accessibility for users of the site.

A full residential Travel Plan supports the measures to promote sustainable travel to the site and the behaviour change required for modal shift. Need to travel by car is reduced by the good access to adjacent Castle Bar Park rail station and bus routes from the site.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM91}.

08HA High Lane Housing Estate:

a. the background and how it was identified;

LPA Response: High Lane Housing Estate is a council owned estate that was built in the 1970s consisting of 3 and 4-storey flat blocks with a large amount of surface level car parking. The site is bounded on three sides by well-established residential streets and is adjacent to Brent River Park to the west.

The site is relatively isolated, with Hanwell Town Centre about 1.5 kilometres to the south. Buses are located within 350 metres of the easternmost part of the site with Hanwell Station, Drayton Green Station and Castle Bar Park Station all located within 1 to 1.5 kilometres.

Planning application, 210009OUT, is a hybrid planning application for the comprehensive phased residential led mixed use redevelopment of estate, to include residential, shop/café and community uses. Permission was granted in March 2023.

Planning application 232807FUL for a temporary community centre (10 years) was approved in October 2023.

This is a council owned site that the council has identified for redevelopment.

b. the uses to be permitted and how they are justified;

LPA Response: The uses include residential, shop/café, community, energy centre and substation. The uses will provide a range of new homes, including affordable and assisted housing alongside with the addition of supporting uses to deliver a successful, sustainable, mixed-use development that makes the best use of land.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary corresponds to that of the High Lane Housing Estate and reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 241 net units (comprising 505 gross gains and 264 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

The anticipated capacity for this site reflects the approved scheme 210009OUT, which entails the comprehensive redevelopment of the existing estate.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is primarily residential with supporting facilities including retail and health.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	72	0	0	94	0	0	75	0	0	0	0	0	0	241

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advised that bespoke phasing was employed based on the approved scheme (210009OUT). This is a hybrid permission, with full permission being secured for phase 1 only at present. Phases 2 and 3 are approved in outline only at this stage. Work started on block K (shop) in May 2023, although the original development partner went into administration in late 2023. As there is limited space to accommodate decanting, delivery has to occur in a linear fashion, with each phase having to complete in order before the next phase can commence. It is hoped that practical completion of phase 1 can occur within 2.5 years. Works on phase 2 can then commence with a similar build out period. Finally phase 3 will commence following completion of phase 2. Total build out time is 7.5 to 10 years.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk and a nearby SINC.

h. how the relevant design criteria are justified, and whether they appropriately

address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding the SINC, the site is likely to have limited indirect or no effect as features could likely be retained, or effects mitigated.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm improvements including public open space and community space; an energy centre and substation; and flood risk mitigation (fluvial and surface water). The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified

mitigation will be effective;

LPA Response: A site assessment was prepared for this allocation as part of the Level 2 SFRA because the extent of the site area falling with flood zones 2 or 3 exceeded the screening thresholds of 0.49% for fluvial sources and or 7.5% for surface water sources. The screening assessment at appendix A of the Level 2 SFRA (EB97) details the extent of overlap as a percentage of the site area. The extent of the site falling within flood zone 2 (fluvial) is 4.04 exceeding the threshold for fluvial sources and triggering a site assessment. The extent of the site area falling within flood zone 3a (surface) is 4.59%, below the respective threshold. No part of the site falls within flood zone 3a (fluvial) or flood zone 3b (fluvial). As noted in the response to Q8 Section 2.5.2 of the IIA summarises the application and cumulative findings of the sequential and exception tests. This concluded that the sequential test has been applied appropriately, and for all cases where triggered the exception test (both parts) was passed. A site assessment proforma for this allocation site is included at appendix B of the Level 2 SFRA. This addresses a number of matters including classifying vulnerability, summarising risk, identifying flood defences, assessing risk for each source, describing the flood mechanism, identifying safe entry and exit routes, identifying mitigation measures, and confirming if site will be safe over its lifetime (as per the exception test). Key findings for this allocation can be summarised as follows:

- The western edge of the site is at risk from fluvial flooding from the River Brent, which flows to the west of the site in a southerly direction (FZ2 4.04% only).
- The site is currently at risk of surface water flooding, particularly in some areas of Hanway Road, and part of Hobbayne Road.
- The Exception Test is required for this site as areas of the site are within Flood Zone 3a (surface water) and the proposed vulnerability classification is 'More vulnerable'. The scheme can pass clause B of the exception test.

Reflecting these findings additional text has been added under the contextual considerations section of the allocation text, drawing out those elements of the evidence which may impinge on the design and layout of any future proposal on this site. The measures/design solutions are deemed to be achievable within the context of the wider allocation parameters. For ease of reference the relevant text is set out here:

> *'The western edge of the site is at risk from fluvial flooding from the River Brent. The site is also currently at risk of surface water flooding, particularly in some areas of Hanway Road, and part of Hobbayne Road. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.'*

As noted above under d) the anticipated capacity for this site is based on an approved permission, which itself has been informed by a site-specific flood risk assessment.

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: The Transport Assessment for the approved scheme (210009OUT) takes into account the varying PTAL of the site from west to east, active travel schemes in the vicinity (existing and proposed), and aligns with relevant policies of the London Plan including car parking and cycle parking provision. Measures to promote active travel include a reduction in the parking ratio compared to the existing site (from approximately 0.72 spaces per dwelling to 0.42 spaces per dwelling), balanced to promote sustainable travel behaviours and encourage walking, cycling and public transport. A range of traffic calming measures have also been incorporated within the design to encourage low vehicle speeds along the length of the spine road and promote a safe and attractive route for active travel. The provision of high-quality public realm, direct and accessible pedestrian routes, cycle parking for each dwelling, pocket parks and wayfinding markers together with the reduction in car parking ratio will help to promote healthy and active lifestyles.

A Travel Plan supports the measures to promote sustainable travel to the site and the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM92}.

01NO Car Sales Site and Northolt Leisure Centre:

a. **the background and how it was identified;**

LPA Response: This is a key strategic and highly accessible site in Northolt Neighbourhood Centre (Strategic Area for Regeneration), located next to Northolt Station and buses in a prominent location that gives it a gateway status. The site is situated at the busy junction of Mandeville Road (A12) and Eastcote Lane North, bounded by a railway line to the south and with Mandeville Parkway Public Open Space across the road.

Northolt Leisure Centre and associated car park accommodates a library, swimming pool, neighbourhood police office and public open space, and is owned by the council. The remainder of the site is owned by Places for London (TfL Property) and comprises a disused car sales site.

Nearby the site is Northolt Village Green Conservation Area, with many Locally Listed Heritage Assets and the Grade I Listed St Mary's Church on the hill, one of the borough's most prized heritage asset.

The site was identified through an Early Call for Sites submission and is partly owned by the council.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are residential, community/leisure, library, employment/retail and public open space. The leisure use, including swimming pool, library and public open space should be retained. The site can also provide much needed homes for the borough with community and retail/employment uses on the ground floor to provide active frontages and additional vitality around Northolt Station.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The site combines the landownership of Places for London and the council and includes a small area of SINC/Green Corridor in the southern part of the car sales site which is needed to make any redevelopment viable. The site boundary reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 190 net units (comprising 190 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply.

The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated capacity figure for this site derives from a draft feasibility study (July 2023) prepared for the site.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Identified commercial space should support the new housing and other uses and provide active frontage at a significant local transport hub.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	63	63	64	0	0	0	0	0	0	0	190

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed, informed by landowner (the Council and TfL) input and associated feasibility work.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, a nearby SINC and Green Corridor, the town centre and regeneration.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but there is a conservation area nearby requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the SINC and Green Corridor, the site overlaps or is adjacent to these designations and development could result in the partial or complete loss of the feature. Design principles therefore require the reprovision of biodiverse planting on site or on adjacent SINC land or if there is any development on SINC land within the site boundary.

Regarding its town centre and strategic area for regeneration location, the site is a strategic site which offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and provide more affordable homes and better access to social infrastructure.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public realm, landscaping, and greening improvements; measures to improve bus interchange; improvements to permeability and active travel; and flood risk mitigation (surface water). The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed

visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: A site assessment was prepared for this allocation as part of the Level 2 SFRA because the extent of the site area falling with flood zones 2 or 3 exceeded the screening thresholds of 0.49% for fluvial sources and or 7.5% for surface water sources. The screening assessment at appendix A of the Level 2 SFRA (EB97) details the extent of overlap as a percentage of the site area. The extent of the site area falling within flood zone 3a (surface) is 21.60% triggering a site assessment. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial). As noted in the response to Q8 Section 2.5.2 of the IIA summarises the application and cumulative findings of the sequential and exception tests. This concluded that the sequential test has been applied appropriately, and for all cases where triggered the exception test (both parts) was passed. A site assessment proforma for this allocation site is included at appendix B of the Level 2 SFRA. This addresses a number of matters including classifying vulnerability, summarising risk, identifying flood defences, assessing risk for each source, describing the flood mechanism, identifying safe entry and exit routes, identifying mitigation measures, and confirming if site will be safe over its lifetime (as per the exception test). Key findings for this allocation can be summarised as follows:

- No fluvial or tidal risk.
- The Exception Test is required for this site as 21.60% of the site area is within Flood Zone 3a (surface water) and the proposed vulnerability classification is 'More vulnerable'.
- Can pass clause B of the exception test.
- The site is at high risk of surface water flooding, particularly in the south-eastern section of the site.

- Development should be directed away from the south-eastern area of the site where there is higher risk of surface water flooding.

Reflecting these findings additional text has been added under the contextual considerations section of the allocation text, drawing out those elements of the evidence which may impinge on the design and layout of any future proposal on this site. The measures/design solutions are deemed to be achievable within the context of the wider allocation parameters. For ease of reference the relevant text is set out here:

> *'The site is at high risk of surface water flooding, particularly in the south-eastern section of the site. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.'*

As addressed elsewhere the allocations omit capacities. The capacities employed for the trajectory either reflect permitted or pending schemes which have already been informed by site specific FRAs, or as is the case in the instance are based on design-based work or capacity calculations which has typically employed conservative assumptions. At a high level this has considered environmental constraints including flood risk, which has moderated the developable area, and will have had a bearing on capacity estimates.

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study

reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM94}. In addition, a further amendment proposed as highlighted in the Council's Written Statement on Matter 9, Qs1 – 9 & 11 – 115: Development Sites at Q.66. It is suggested that, under design principles, the 11th bullet point regarding car parking for any residential development should be deleted given that the site has a PTAL of 4.

02NO Mandeville Parkway:

a. **the background and how it was identified;**

LPA Response: The site encompasses Mandeville Parkway, a large area of public open space and Lewes Close, three blocks of three-storey residential flats owned by the Council. Mandeville Parkway is edged with mature trees along its northern and southern boundaries.

The site is bounded by Mandeville Road to the south, one of the main routes through the town, and two storey housing to the north, west and east. The site includes a layby for buses and a bus stop. It is located across the road from Northolt Leisure Centre and Library, and close to Northolt Station. Northolt Neighbourhood Centre, a Strategic Area for Regeneration is within a few minutes' walk from the site. Nearby the site is Northolt Village Green Conservation Area, with many Locally Listed Heritage Assets and the Grade I Listed St Mary's Church on the hill, one of the borough's most prized heritage asset.

The site is owned by the council and has been identified for some limited enabling development.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are residential and green space. The council is keen to upgrade Mandeville Parkway to make it more accessible and improve its quality. Some enabling residential development, limited to infill on Lewes Close and garages at the end of Thirsk Close, Wetherby Close and next to Redcar Close will provide the necessary funds to achieve this ambition, as well as adding to the housing offer in the area. Any proposals should not result in the loss of public open space.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The site boundary includes the whole of Mandeville Parkway Public Open Space and Lewes Close, and garages at the end of Thirsk Close, Wetherby Close and Redcar Close. The boundary includes Previously Developed Land (Lewes Close including car parking area, and garages) which can be developed, and Mandeville Parkway, which will be improved with better access, quality and management.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 106 net units (comprising 106 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated capacity figure for this site reflects the pending application 224817FUL for 106 units.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: N/A

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	53	53	0	0	0	0	0	0	0	0	0	0	106

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed informed by the pending application status and supporting material. The indicative programme detailed as part of the application suggested that works could start in mid-2024. Noting that the application is still pending, and factoring in time to discharge conditions, if approved commencement is likely to be pushed back to 2026 at the earliest. The construction logistics plan advises that build out is expected to take place over approximately 28 months. Reflecting this position, capacity is assigned over years 4 and 5.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, green space designations including a SINC and regeneration.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a**

whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding the SINC and Green Corridor, they are both separated from the site by built development and the road networks ensuring adverse impacts are unlikely.

Regarding its strategic area for regeneration location, the site offers an opportunity, for example, to optimise the use of the land, provide more affordable homes and make improvements to green infrastructure.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public open space improvements and measures to improve active travel. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2**

-Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 1.23% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: The measures to promote active travel take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. The pending application is for a car-free development for future residents, with active frontages and rationalization of parking. A Travel Plan supports measures to promote sustainable travel to the site and supports the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No.

03NO Northolt Sorting Office:

a. **the background and how it was identified;**

LPA Response: The site is a strategic site located within the Northolt Town Centre, close to Northolt Station and Leisure Centre. It currently accommodates a post office and other retail/commercial units. A third of the site is occupied by a surface level car park.

The site is essential to the character of the town centre, part of which includes Northolt Village Green Conservation Area, with several locally listed buildings and buildings with group value and the Grade I listed St Mary's Church is nearby.

The site is currently underdeveloped and has capacity to provide a denser development which should include the retention of the post office and will help improve the offer of Northolt Neighbourhood Centre, with and an improved public realm and more active frontage.

The site was Identified through the London SHLAA 2017 and pre application meeting.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are residential, retail/commercial and post office use. The site is currently underdeveloped and provides a good opportunity for intensification suitable to its town centre location with much needed residential homes, and retail/commercial units on the ground floor, including the retention of the post office use to expand the town centre offer and revitalise the area.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary includes the area covered by the post office building, Royal Mail Depot and associated car park. The site boundary reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 44 net units (comprising 44 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool, which assumed comprehensive redevelopment of the site. Further detail about this tool is explained on page 14 of EB73.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led" and commercial space should compliment the existing centre.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	22	22	0	0	0	0	0	0	0	0	0	44

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed informed by pre-app interest. Whilst the proposed end use sought through this pre-app interest differs, this interest nonetheless is indicative of appetite to bring forward this site. Having regard to this status/activity, capacity is assigned to years 5 & 6.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage, a nearby SINC and the town centre.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding heritage, there are no designated or non-designated heritage assets within the site, but there is a conservation area and locally listed

building nearby requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the SINC, it is separated from the site by built development and the road network ensuring adverse impacts are unlikely.

Regarding its town centre location, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public realm and greening improvements, measures to improve active travel, and retention of the post office. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made

as proposed in the Schedule of Suggested Modifications {S24 - reference SMM95}.

04NO Northolt Driving Range:

a. **the background and how it was identified;**

LPA Response: The site is owned by the council and located adjacent to Belvue Park and the Grand Union Canal. Belvue School is located to the west of the site, and a mosque and associated housing to the east. A footbridge across the Canal at the western corner of the site links to Greenford Industrial Estate. The site is within the setting of St Mary's Church, a Grade I Listed Building, and Northolt Village Green Conservation Area. The A40 Western Avenue borders the site to the south.

The current uses on the site include a sports facility with a golf driving range and a gym located to the east of the site.

The site was Identified through the London SHLAA 2017 and pre application meeting.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are employment/industrial and residential. The site is located close to Greenford Industrial Estate and provides an excellent opportunity to make new provision for industrial uses, co-located with residential development to help provide much needed homes in the area. Any development proposal for the site will be expected to adopt a masterplan approach to ensure that any mixed-use development complements future industrial provision and contributes to placemaking, beginning with an analysis of industrial demand in the area and considering what types of provision can best be accommodated given the site constraints.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary includes all the land that is known as Northolt Driving Range and reflects the council's current understanding of the extent of the development opportunity.

The Canal and River Trust have asked that the land in their ownership be excluded from the site boundary. It is therefore suggested that an amendment is made to the boundary as proposed in in the Schedule of Suggested Modifications {S24 – reference SMM96} and Schedule of Suggested Modifications Appendix B {S24b}.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 212 net units (comprising 212 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool, which assumed a mixed-use model for this site prioritising industrial provision first. Further detail about this tool is explained on page 14 of EB73.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "employment-led". Any commercial space should complement the main employment use.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	0	53	53	53	53	0	0	0	0	212

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that in the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 29.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, a nearby SINC and Green Corridor and LSIS.

h. **how the relevant design criteria are justified, and whether they appropriately**

address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but there is a conservation area nearby requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regards the SINC, this is small area within north-eastern boundary of site and there is also a small part of green corridor within the boundary of site to the south-west. With appropriate mitigation these areas could be retained and protected.

Regards the LSIS, the allocation seeks to redesignate much of the site for employment led regeneration and through a master plan approach seeks to ensure synergies with the neighbouring industrial land to the east of the canal.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include measures to improve active travel, improvements to the canal towpath, and flood risk mitigation (surface water). The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study

used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: A site assessment was prepared for this allocation as part of the Level 2 SFRA because the extent of the site area falling with flood zones 2 or 3 exceeded the screening thresholds of 0.49% for fluvial sources and or 7.5% for surface water sources. The screening assessment at appendix A of the Level 2 SFRA (EB97) details the extent of overlap as a percentage of the site area. The extent of the site area falling within flood zone 3a (surface) is 14.04% triggering a site assessment. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial). As noted in the response to Q8 Section 2.5.2 of the IIA summarises the application and cumulative findings of the sequential and exception tests. This concluded that the sequential test has been applied appropriately, and for all cases where triggered the exception test (both parts) was passed. A site assessment proforma for this allocation site is included at appendix B of the Level 2 SFRA. This addresses a number of matters including classifying vulnerability, summarising risk, identifying flood defences, assessing risk for each source, describing the flood mechanism, identifying safe entry and exit routes, identifying mitigation measures, and confirming if site will be safe over its lifetime (as per the exception test). Key findings for this allocation can be summarised as follows:

- No fluvial or tidal risk.
- The assessment recorded that the Exception Test is not required for this site as the proposed vulnerability classification is 'Less vulnerable'. Given that the allocation allows for the potential inclusion of residential accommodation alongside new industrial provision, the vulnerability classification should in fact have been recorded as ‘More Vulnerable’, and as a consequence the Exception Test should have been applied. This site assessment may need to be updated in part.
- The site is at high risk of surface water flooding, particularly in the southern section, and along the western boundary. Development should be directed away from the southern and western areas of the site where there is higher risk of surface water flooding.
- The site is located within 5m of an Ordinary Watercourse.

Reflecting these findings additional text has been added under the contextual considerations section of the allocation text, drawing out those elements of the evidence which may impinge on the design and layout of any future proposal on this site. The measures/design solutions are deemed to be achievable within the context of the wider allocation parameters. For ease of reference the relevant text is set out here:

> *'The site is at risk of surface water flooding, particularly in the southern section, and along the western boundary. The site is also located within 5m of an Ordinary Watercourse. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.'*

This may need to be revisited in light of any revised assessment findings.

As addressed elsewhere the allocations omit capacities. The capacities employed for the trajectory either reflect permitted or pending schemes which have already been informed by site specific FRAs, or as is the case in the instance are based on design-based work or capacity calculations which has typically employed conservative assumptions. At a high level this has considered environmental constraints including flood risk, which has moderated the developable area, and will have had a bearing on capacity estimates.

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant

typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM96}.

05NO Medlar Farm Estate:

a. **the background and how it was identified;**

LPA Response: Medlar Farm Estate is a housing estate owned by the council. The housing estate set back from the busy White Hart Roundabout to the west and adjacent to Rectory Park and Rectory Fields Green Belt.

The site is bounded on the north east by Church Road (A312) and the south east by Ruislip Road. To the north east is low rise housing, mostly 2 storey semi-detached and terraced houses. The 12 storey and 4 storey linear blocks are interspersed with grassed areas and there are many mature trees, including Medlars which give the estate its name. Some of the blocks are arranged to form courtyards enclosing grassy areas and an area of hardstanding. There is one road into the estate, accessed off Parkfield Drive and several pedestrian paths.

The nearest shops are on Church Road and Yeading Lane, which provide limited everyday shopping and there is a children's centre located in the northern part of the site that will need to be reprovided as part of any redevelopment of the site.

White Hart Public House, a Grade II Listed Building is located across from Medlar Farm Estate on the corner of Ruislip Road and Church Road.

The site is owned by the council and was identified as a site that the council would like to be allocated for development.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are residential, community, retail/commercial and public open space. The Estate is in need of refurbishment or redevelopment and has the capacity to provide higher densities to meet the need for new homes in the area and wider borough. The children's centre should be reprovided and opportunities considered to provide retail/commercial units on Church Road and Ruislip Road at ground floor level to increase active frontages and increase the retail offer for local residents. A new public square and public realm improvements would help create a hub of activity and enhance placemaking for this important site.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary corresponds to the extent of the housing estate and reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 197 net units (comprising 235 gross gains and 38 gross losses). Please

note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool, which assumed principally an infill scenario with a small element of redevelopment. Further detail about this tool is explained on page 14 of EB73.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Commercial should complement the main allocated use.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	0	0	0	0	49	49	49	50	0	197

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed informed by landowner (the Council) input. This is a longer-term project/opportunity with delivery anticipated after year 10.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal

with flood risk, heritage, a nearby SINC and Green Corridor and regeneration.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but there is a designated heritage asset (GII) nearby requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the SINC and green Corridor, both are separated from the site by built development and the road network ensuring adverse impacts are unlikely.

Regarding its strategic area for regeneration location, the site offers an opportunity, for example, to optimise the use of the land, provide more affordable homes and improved green and social infrastructure.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include the reprovision of a children's centre; highways, public realm, landscaping, and greening improvements; a new public square; and green links. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 3.15% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study

reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No.

06NO Yeading Lane I:

a. **the background and how it was identified;**

LPA Response: Yeading Lane I is a large housing estate located next to the White Hart Roundabout. The estate comprises a mix of flats and houses, ranging in height from 2 to 10 storeys. The estate is bounded by The Parkway to the east and Yeading Lane to the east. The southern edge borders LB Hillingdon.

The estate is characterised by its poor public realm with buildings surrounded by grassy areas that lack definition and are not welcoming or useable. The houses have back gardens and there are many mature trees which provide a contrast to the dominant roads, parking areas, and dilapidated garages. Pedestrians and cyclists are not prioritised.

The estate includes the Yeading Lane Estate Open Space, and part of the Hayes Bypass Roughs SINC and is adjacent to the Ruislip Road Green Corridor. The northern part of the site is home to the Church of St Joseph the Worker, a church hall and vicarage.

The estate is a strategic site included in the White Hart Roundabout Strategic Masterplan Area.

The site is owned by the council and was identified as a site that the council would like to be allocated for development.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are residential, retail/commercial, café/restaurant and community. The residential development should reprovide affordable and assisted housing alongside new residential units to provide much needed housing in the local and wider area. The church should be retained and new community facilities if required. Retail/commercial, community and café/restaurant uses introduced along Yeading Lane will provide more active frontages and provide benefits for local residents and the wider community.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary corresponds to the area of the Estate that the council would like to regenerate.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 107 net units (comprising 262 gross gains and 155 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our

future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool, which assumed a combination of infill, redevelopment and air space development. Further detail about this tool is explained on page 14 of EB73.

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Commercial should complement the main allocated use.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	35	36	36	0	0	0	0	0	0	107

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed informed by landowner (the Council) input. Some initial feasibility work has been undertaken. Delivery is anticipated after year 5.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, green space designations and regeneration.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding flood risk, see response to Q l below.

Regarding the SINC and Green Corridor, the site overlaps or is adjacent to both designations requiring mitigation of any adverse impacts. Design principles seek to upgrade the Yeading Lane Estate Open Space and the area of SINC between the estate and The Parkway.

Regarding its strategic area for regeneration location, the site offers an opportunity, for example, to optimise the use of the land, provide more affordable homes and improved green infrastructure.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include highways, public realm, landscaping, and greening improvements; measures to improve permeability; and improvements to active travel and green links. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study

used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 3.59% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over

the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No.

07NO Yeading Lane II:

a. **the background and how it was identified;**

LPA Response: Yeading Lane II is set back from the Ruislip Road and is bounded on three sides by Rectory Fields Green Belt. It is across the road from Rectory Park which has recently benefitted from investment.

The estate is characterised by 2 storey terraced housing, with 3 storey blocks of flats located on the south eastern edge adjoining Rectory Fields. Surrounded by grassy areas and mature trees, the estate is dominated by its roads and car parking. There is a small play area in the western part of the estate.

Several bus routes run along the Ruislip Road. There is a small block of retail, commercial and professional services on the Ruislip Road within a few minutes' walk of the site, however the small supermarket has been closed for several years, and the mini centre has little to offer local residents.

The site is owned by the council and was identified as a site that the council would like to allocate for development.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are residential and community. Residential development should reprovide affordable and assisted housing alongside the provision of new residential units to meet the housing needs of the local and wider community. Community space will provide a useful facility for local residents.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary corresponds to the area of the Estate that the council would like to regenerate. Some areas of Green Belt land were included within the site boundary in error. It is therefore suggested that a modification be made to amend the site boundary to exclude areas of Green Belt as suggested in Schedule of Suggested Modifications {S24 - reference SMM97 and SMM154} and Schedule of Suggested Modifications Appendix B {S24b}.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 189 net units (comprising 204 gross gains and 15 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool, which was based principally on an infill scenario with a small element of redevelopment. Further detail about this tool is explained on page 14 of EB73.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Commercial should complement the main allocated use.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	0	47	47	47	48	0	0	0	0	189

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 29.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, green space designations and regeneration.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a**

whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding green space designations, it is proposed that Green Belt be removed from the site allocation and booth the SINC and Green Corridor, both are separated from the site by built development and the road network ensuring adverse impacts are unlikely.

Regarding its strategic area for regeneration location, the site offers an opportunity, for example, to optimise the use of the land, provide more affordable homes and social and green infrastructure.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public realm improvements; measures to improve active travel and green links; and the provision of play space facilities. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is**

justified;

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: A site assessment was prepared for this allocation as part of the Level 2 SFRA because the extent of the site area falling with flood zones 2 or 3 exceeded the screening thresholds of 0.49% for fluvial sources and or 7.5% for surface water sources. The screening assessment at appendix A of the Level 2 SFRA (EB97) details the extent of overlap as a percentage of the site area. The extent of the site area falling within flood zone 3a (surface) is 7.85% just exceeding the threshold for surface sources and triggering a site assessment. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial). As noted in the response to Q8 Section 2.5.2 of the IIA summarises the application and cumulative findings of the sequential and exception tests. This concluded that the sequential test has been applied appropriately, and for all cases where triggered the exception test (both parts) was passed. A site assessment proforma for this allocation site is included at appendix B of the Level 2 SFRA. This addresses a number of matters including classifying vulnerability, summarising risk, identifying flood defences, assessing risk for each source, describing the flood mechanism, identifying safe entry and exit routes, identifying mitigation measures, and confirming if site will be safe over its lifetime (as per the exception test). Key findings for this allocation can be summarised as follows:

- No fluvial or tidal risk.
- The Exception Test is required for this site as 7.85% of the site area is within Flood Zone 3a (surface water) and the proposed vulnerability classification is 'More vulnerable'.
- Can pass clause B of the exception test.
- The site is at high risk of surface water flooding, particularly along Aspen Lane in the southern and eastern sections and along Hazeltree Lane.

Reflecting these findings additional text should be added under the contextual considerations section of the allocation text (as a proposed modification), drawing out those elements of the evidence which may impinge on the design and layout of any future proposal on this site. The measures/design solutions are deemed to be achievable within the context of the wider allocation parameters. The following text is recommended for inclusion:

> *'The site is at risk of surface water flooding, particularly along Aspen Lane in the southern and eastern sections and along Hazeltree Lane. The design and layout*

of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment.'

As addressed elsewhere the allocations omit capacities. The capacities employed for the trajectory either reflect permitted or pending schemes which have already been informed by site specific FRAs, or as is the case in the instance are based on design-based work or capacity calculations which has typically employed conservative assumptions. At a high level this has considered environmental constraints including flood risk, which has moderated the developable area, and will have had a bearing on capacity estimates.

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: Yes, in relation to the site boundary as highlighted in the Council's response to Initial Questions dated 10 January 2025 [EX3] and the Council's Written Statement on Matter 9, Qs1 – 9 & 11 – 115: Development Sites at Q.79. It is suggested that further amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM97}. An additional modification regarding flood risk is also proposed at l above.

08NO Grange Court:

a. **the background and how it was identified;**

LPA Response: Grange Court is a residential estate comprising a mix of 3 and 5 storey blocks of flats with three semi-detached houses, surrounded by grassed open space and parking courtyards. Vehicular access is from the Old Ruislip Road. Permeability through the site is poor and there are no formal play spaces for children, who are prohibited from playing ball games on the grassed areas.

The estate is adjacent to Green Belt land to the north (West London Shooting Ground) and surrounded by a predominantly residential area characterised by two storey semi-detached houses. The nearest shops and services are within 500 metres along Yeading Lane and Church Road, providing limited everyday shopping.

There are a number of mature and semi mature trees on the estate, which should be retained. There is a substation on the site that might need to be relocated and its capacity increased.

The site is owned by the council and was identified as a site that the council would like to allocate for development.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are residential, community, retail/commercial, nursery and a substation. Residential redevelopment should reprovide affordable and assisted housing alongside new residential units to provide much needed homes for the local and wider community. New community space, a nursery and some retail/commercial units on the Old Ruislip Road and Edward Road would increase the local offer for the local community, adding active frontages, passive surveillance and vitality to the estate. The substation should be retained or relocated and its capacity increased to provide additional need in an area with increasing development.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The site boundary corresponds to the Grange Court Estate boundary and reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 147 net units (comprising 147 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. None of the existing units on the site are anticipated to be lost.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool and is based off an infill scenario. Further detail about this tool is explained on page 14 of EB73.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Commercial should complement the main allocated use.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	0	0	0	0	36	37	37	37	0	147

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed informed by landowner input (the Council). This is a longer-term project/opportunity with delivery anticipated after year 10.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage and a nearby Green Corridor.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a**

whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but there is designated heritage asset close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the Green Corridor, it is separated from the site by built development and the road network ensuring adverse impacts are unlikely.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include a new community centre; children's nursery; highways, public realm, landscaping, and greening improvements; play space facilities; and improvements to permeability, active travel, and green links. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is**

justified;

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 1.08% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and

potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No.

09NO Kingdom Workshop, Sharvel Lane:

a. **the background and how it was identified;**

LPA Response: The site has been selected to accommodate future Gypsy and Traveller need within the borough with a proposal for six pitches, following a public consultation exercise in July and August 2023. Full details of the selection assessment process and details of 'Site 5: West London Shooting Ground' can be found in the Gypsy and Traveller Pitch Provision Site Assessment, June 2023 {EB74}.

The current use on the site is an unconsented lorry repair workshop, which is a non-compliant Green Belt use.

The site is located within Down Barns Farm and close to the West London Shooting Ground, designated Green Belt and close to an area of Local SINC. The surrounding area is farmland, with a trade shop for construction and engineering tools located adjacent to the site. A golf course lies to the north of the site within neighbouring London Borough of Hillingdon. The site is accessed along via Sharvel Lane, off West End Road/Ruislip Road (A4180).

Close to the site is Downe Barns, a Scheduled Ancient Monument.

The site was identified through the Early Call for Sites and Reg 18 Call for Sites submission.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed use is for Gypsy and Traveller pitches/accommodation. The proposed use is to meet the identified future need for six Gypsy and Traveller pitches.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary corresponds to the extent of the site known as Kingdom Workshop, Previously Developed Land within the Down Barns/ West London Shooting Grounds Green Belt. The extent of the boundary provides enough space for a Gypsy and Traveller site comprising six pitches.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: The allocation assumes no conventional or non-conventional residential component as proposed.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: N/A

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: As noted above, the allocation makes no provision for conventional or non-conventional residential accommodation.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with archaeology and green space designations.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding archaeology, the site is within an Archaeological Priority Area. Further consultation with either GLAAS or a conservation heritage advisor will be required over any future development proposals.

Regarding green space designations, the site is likely to have limited indirect or no effect on the nearby SINC or the green corridor. It is proposed that the site be de-designated as Green Belt and the impact on the openness of the surrounding Green Belt is mitigated by a mound to the west, south and east and trees to the north.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include utilities including water and electricity; public realm and greening measures; and play space facilities. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of

building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: The current use is an informal, quasi-industrial use that is poorly located on the road network and is not considered to provide capacity for industrial reuse.

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal

shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM98}.

10NO Airways Estate:

a. the background and how it was identified;

LPA Response: Airways Estate is owned and managed by A2 Dominion, a Registered Social Landlord.

The housing estate is predominantly a linear blocks of flats between 3 and 4 storeys with some undercroft car parking, surrounded by open spaces and car parking areas that is poor in quality and does not function well. There is little or no legibility or visual connection between spaces within the estate.

The estate is set back from Kensington Road, bounded on the south by Grand Union Canal with its Green Belt and SINC designations. A short walk to the north is Smiths Farm Public Open Space and Northala Fields lie a bit further to the north east. The rest of the surrounding area is characterised by residential housing, mostly 2 storey modern terraced houses and 4 storey blocks of flats.

There is one bus route on Kensington Road, and little other public transport within easy access. There is a convenience shop on Hotspur Road to the north of the site, next to Smith's Farm Community Centre, otherwise the site is fairly isolated from local shopping, and other services, with Northolt town centre and Northolt Station within a 20-minute walk.

The site was submitted through the Regulation 18 Call for Sites.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are residential and community. Residential development should reprovide affordable and assisted housing alongside new residential and community uses. This is to ensure that the housing needs of the local and wider community can be met and community space to help foster social interaction and the overall quality of neighbourhood life.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary corresponds to the site submitted by A2 Dominion and reflects the council's current understanding of the extent of the development opportunity.

A small modification to the site boundary has been suggested to exclude a small amount of Green Belt land from the site allocation that was included in error. See the Schedule of Suggested Modifications {S24 - reference SMM99} and Appendix B {S24b}.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 351 net units (comprising 498 gross gains and 147 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool. Further detail about this tool is explained on page 14 of EB73.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: N/A

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	87	88	88	88	0	0	0	0	0	0	351

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed, informed by landowner input, but moderated to reflect planning status. Whilst it was expressed through the call for sites exercise that delivery could occur within 5 years, it was noted that the site doesn't currently benefit from a planning permission, nor are there any live applications associated with this site. It was therefore considered appropriate to moderate delivery assumptions assigning capacity from year 6 onwards.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, green and blue space designations and regeneration.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding green space designations, the site is likely to have limited indirect or no effect on the nearby SINC, Green Corridor or MOL.

Regarding its strategic area for regeneration location, the site offers an opportunity, for example, to optimise the use of the land, provide more affordable homes and social infrastructure.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include a community centre; public realm and greening improvements; measures to improve active travel and green links; and flood risk mitigation (surface water). The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was prepared for this allocation as part of the Level 2 SFRA because the extent of the site area falling with flood zones 2 or 3 exceeded the screening thresholds of 0.49% for fluvial sources and or 7.5% for surface water sources. The screening assessment at appendix A of the Level 2 SFRA (EB97) details the extent of overlap as a percentage of the site area. The extent of the site area falling within flood zone 3a (surface) is 8.65% exceeding the threshold for surface sources and triggering a site assessment. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial). As noted in the response to Q8 Section 2.5.2 of the IIA summarises the application and cumulative findings of the sequential and exception tests. This concluded that the sequential test has been applied appropriately, and for all cases where triggered the exception test (both parts) was passed. A site assessment proforma for this allocation site is included at appendix B of the Level 2 SFRA. This addresses a number of matters including classifying vulnerability, summarising risk, identifying flood defences, assessing risk for each source, describing the flood mechanism, identifying safe entry and exit routes, identifying mitigation measures, and confirming if site will be safe over its lifetime (as per the exception test). Key findings for this allocation can be summarised as follows:

- No fluvial or tidal risk.
- The Exception Test is required for this site as 8.65% of the site area is within Flood Zone 3a (surface water) and the proposed vulnerability classification is 'More vulnerable'.
- Can pass clause B of the exception test
- The site is at high risk of surface water flooding, particularly along Leander Road and Brabazon Road located in the north, west and centre of the site.
- Development should be directed away from the northern and western areas of the site where there is higher risk of surface water flooding. Development should also be avoided in the vicinity of Leander Road and Brabazon Road in the centre of the site.
- The site is located within 5m of an Ordinary Watercourse.

Reflecting these findings additional text has been added under the contextual considerations section of the allocation text, drawing out those elements of the

evidence which may impinge on the design and layout of any future proposal on this site. The measures/design solutions are deemed to be achievable within the context of the wider allocation parameters. For ease of reference the relevant text is set out here:

'The site is at risk of surface water flooding, particularly along Leander Road and Brabazon Road located in the north, west and centre of the site. The site is also located within 5m of an Ordinary Watercourse. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessments read alongside the general mitigation requirements.'

As addressed elsewhere the allocations omit capacities. The capacities employed for the trajectory either reflect permitted or pending schemes which have already been informed by site specific FRAs, or as is the case in this instance are based on design-based work or capacity calculations which has typically employed conservative assumptions. At a high level this has considered environmental constraints including flood risk, which has moderated the developable area, and will have had a bearing on capacity estimates.

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range

of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: Yes, in relation to the site boundary as highlighted in the Council's response to Initial Questions dated 10 January 2025 [EX3] and the Council's Written Statement on Matter 9, Qs1 – 9 & 11 – 115: Development Sites at Q.84. It is suggested that further amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM99}. In addition, a further amendment proposed as highlighted in the Council's Written Statement on Matter 9, Qs1 – 9 & 11 – 115: Development Sites at Q.85. It is suggested that a new bullet point is added under contextual considerations in response to representations by the Canal and River Trust which was inadvertently omitted from the Schedule of Proposed Modifications.

01PE BP Garage:

a. the background and how it was identified;

LPA Response: The site is located on the A40 (Western Avenue), one of the main and busiest arterial roads out of London to the west. It currently accommodates a petrol station and café. Bordering the site to the west and south is well established residential development, a mix of flats and houses. To the east there is a recently constructed residential development comprising 57 flats in 9-storey buildings. A small part of the site on the A40 is located within the Western Avenue Green Corridor and a number of trees bordering the site are protected by Tree Preservation Orders.

Buses run along the A40 and nearby Argyle Road, and Perivale Underground Station is a 10-minute walk. Central Parade, a secondary shopping frontage is located on the A40 just a couple of minutes' walk, and the nearest town centres are Greenford and Ealing Broadway, which are accessible by public transport. To the south of the site is Ealing Golf Course and Brent River Park, and Gurnell Leisure Centre to the south west.

The site was identified and recommended by an Ealing officer.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are residential and commercial. The uses will provide much needed housing for the borough and the reprovision of commercial uses such as a supermarket or petrol station will complement the increasing levels of residential development in the area, helping to deliver a successful, sustainable development that makes best use of land.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary includes the petrol station, an electrical sub-station, a number of TPOs and other trees. The site boundary corresponds to the single land ownership of the site and reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 98 net units (comprising 98 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site. These figures exclude any capacity which has already been completed on the adjacent site.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool, which assumed the full redevelopment of the site. Further detail about this tool is explained on page 14 of EB73.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation; new provision would replace that currently on the site and support the new residential uses.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	32	33	33	0	0	0	0	0	0	98

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 28.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with green space designations including a SINC and Green Corridor.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding the green space designations, the site is likely to have limited indirect or no effect on SINC/ green corridor as features could likely be retained or any adverse effects mitigated.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public realm and landscaping improvements and measures to improve active travel. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM101}.

02PE Land on South Side of Western Avenue:

a. the background and how it was identified;

LPA Response: The site is a small, vacant piece of land located on the A40 (Western Avenue) and represents a strategic site for Perivale. To the west is a hotel and a large pub with carvery/restaurant and to the south is the club house for Ealing Golf Club and Brent River Park. This prominent site is well located to establish a gateway building between Western Avenue and the nearby Metropolitan Open Land. The northern part of the site is situated with the Western Avenue Green Corridor.

The site was submitted through the Early Call for Sites.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are residential which are suitable for small sites and will provide much needed housing for the borough.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The site boundary corresponds to the vacant triangle of land located between Western Avenue, a hotel and the Ealing Golf Course Club House and access road. The site boundary reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 48 net units (comprising 48 gross gains and 0 gross losses). As the site is categorised as a 'small site' with a site area smaller than 0.25ha, the capacity figure given here does not feature as an individual site input in the trajectory and is substituted with a single modelled/forecast small sites windfall input. Notwithstanding this position, an individual site capacity figure has been generated using the R19 capacity calculator tool to provide an indicative figure for this exercise only.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: N/A

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: As this allocation is categorised as a small site and individual site capacity estimates have been substituted by a single combined input covering the

contribution from all small sites, phasing has not been determined at an individual site level.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage, archaeology and green space designations.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding heritage, there are no designated or non-designated heritage assets within the site, but there are a number of designated heritage assets close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding archaeology, the site is within an Archaeological Priority Area. Further consultation with either GLAAS or a conservation heritage advisor will be required over any future development proposals.

Regarding the green space designations, the site is likely to have limited indirect or no effect on SINC/ green corridor as features could likely be retained or any adverse effects mitigated.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm improvements and measures to improve active travel. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site,

detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM102}.

03PE Alperton Lane North:

a. the background and how it was identified;

LPA Response: The site forms a detached and isolated part of Park Royal Strategic Industrial Location (SIL) and is currently occupied by a number of small businesses including a car wash, car sales business, a catering company and IT security company.

The site is located on Alperton Lane, bounded by a railway line to the north east and residential properties to the west. A bus route runs along the nearby A40 Western Avenue and the nearest stations are Perivale Underground and Alperton Underground, both of which are a 20-minute walk.

The development of the site is expected to deliver an increase in overall industrial provision and follow a master planned approach similar to that set out for LSIS.

The site was identified and recommended by an Ealing officer.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed use is industrial, with ancillary uses such as residential if required. Proposals are expected to set out the provision of industrial uses initially and these may be facilitated by ancillary provision of other uses for economic reasons.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary corresponds to the area of SIL and reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 47 net units (comprising 47 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool, which assumed a mixed-use intensification model for this site prioritising industrial provision. Further detail about this tool is explained on page 14 of EB73.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: N/A

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	15	16	16	0	0	0	0	0	0	47

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. The recent pre-app interest for a commercial only scheme was noted. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 28.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with green space designations and SIL.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding green space designations, the site is likely to have limited indirect or no effect on SINC, Green Corridor or Priority Habitat as features could likely be retained, or effects mitigated.

Regarding the SIL, the proposed use is for industrial led mixed use intensification.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include highways, public realm, landscaping, and greening improvements. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: The site is proposed for mixed use intensification comparable with LSIS. This should see no reduction of industrial capacity and reflects its isolated location from the rest of the SIL.

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No.

04PE Alperton Lane South and Metroline Depot:

a. the background and how it was identified;

LPA Response: The site forms a detached, isolated part of Park Royal SIL. Its current uses include a large self-storage facility, bus depot and small business units. The eastern part of the site is MOL. The site is bounded by a railway line and Green Corridor to the north, the River Brent and A40 Western Avenue to the south, and Alperton Lane to the north west. Adjoining the site to the west are a coffee shop and fast-food restaurant.

A bus route runs along the A40, and the nearest stations are Perivale Underground and Alperton Underground, both of which are about a 20-minute walk.

The development of the site is expected to deliver an increase in overall industrial provision and follow a master planned approach similar to that set out for LSIS.

The site was identified through the London SHLAA 2017.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed use is industrial, with ancillary uses such as residential if required. The Transport for London (TfL) bus depot and access should be retained or a suitable alternative location found. Proposals are expected to set out the provision of industrial uses initially and these may be facilitated by ancillary provision of other uses for economic reasons.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary corresponds to the area of SIL and bus depot and reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 190 net units (comprising 190 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool, which assumed a mixed-use intensification model for this site prioritising industrial provision. Further detail about this tool is explained on page 14 of EB73.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: N/A

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	0	47	47	48	48	0	0	0	0	190

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 29.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk and green space designations.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding green space designations, the entirety of the site is previously developed land. The Central Line Green Corridor covers the boundaries to the south, east and

north of the site. The eastern part of the site is designated MOL. The site is likely to have limited indirect or no effect on SINC, Green Corridor or Priority Habitat as features could likely be retained, or effects mitigated.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include highways, public realm, landscaping, and greening improvements as well as flood risk mitigation (surface water). The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: The site is proposed for mixed use intensification comparable with LSIS. This should see no reduction in industrial capacity and reflects its isolated location from the rest of the SIL.

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified

mitigation will be effective;

LPA Response: A site assessment was prepared for this allocation as part of the Level 2 SFRA because the extent of the site area falling with flood zones 2 or 3 exceeded the screening thresholds of 0.49% for fluvial sources and or 7.5% for surface water sources. The screening assessment at appendix A of the Level 2 SFRA (EB97) details the extent of overlap as a percentage of the site area. The extent of the site area falling within flood zone 2 (fluvial) is 54.86%. The extent within flood zone 3a (fluvial) is 39.85%. The extent within flood zone 3b (fluvial) is 12.16%. In respect of surface sources 12.62% lies in flood zone 3a (surface). As noted in the response to Q8 Section 2.5.2 of the IIA summarises the application and cumulative findings of the sequential and exception tests. This concluded that the sequential test has been applied appropriately, and for all cases where triggered the exception test (both parts) was passed. A site assessment proforma for this allocation site is included at appendix B of the Level 2 SFRA. This addresses a number of matters including classifying vulnerability, summarising risk, identifying flood defences, assessing risk for each source, describing the flood mechanism, identifying safe entry and exit routes, identifying mitigation measures, and confirming if site will be safe over its lifetime (as per the exception test). Key findings for this allocation can be summarised as follows:

- The site is at risk from fluvial flooding from the River Brent, which flows to the south of the site in a westerly direction (FZ2 54.86%, FZ3a 39.85%, FZ3b 12.16%). Only water compatible or essential uses (subject to the Exception Test) are permitted in FZ3b (the south-eastern edge of the site which runs along the River Brent).
- The site is currently at risk of surface water flooding, particularly in the access roads in the north-western area and through the central area of the site.
- The Exception Test can be passed by making the site safe throughout its lifetime without increasing flood risk elsewhere.
- The site is located within 8m of a Main River or 5m of an Ordinary Watercourse.

Reflecting these findings additional text has been added under the contextual considerations section of the allocation text, drawing out those elements of the evidence which may impinge on the design and layout of any future proposal on this site. The measures/design solutions are deemed to be achievable within the context of the wider allocation parameters. For ease of reference the relevant text is set out here:

> *'The site is at high risk of both fluvial and surface water flooding, encompassing in part the 'Functional Floodplain'. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment, and any future site-specific flood risk assessment required to support a planning application.'*

As addressed elsewhere the allocations omit capacities. The capacities employed for

the trajectory either reflect permitted or pending schemes which have already been informed by site specific FRAs, or as is the case in this instance are based on design-based work or capacity calculations which has typically employed conservative assumptions. At a high level this has considered environmental constraints including flood risk, which has moderated the developable area, and will have had a bearing on capacity estimates.

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM103}.

01SO Southall Crossrail Station and Gurdwara:

a. the background and how it was identified;

LPA Response: The site is located at the crest of a road bridge which crosses the Great Western Railway Line. Its elevated position gives the station a prominent presence in the area and provides good views. The site is located within Southall Major Centre and is a key gateway site in Southall, highly accessible with Southall Station on the Elizabeth Line providing a fast link into Ealing and central London, and bus routes providing links to more local areas.

The site includes the Gurdwara Sri Guru Singh Saba with associated parking and retail and industrial uses to the east of the site.

The site offers a unique opportunity to optimise its location with the provision of new homes, commercial opportunities and critical social infrastructure, and a landmark building and public space of significance for Southall and beyond.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, SOU4 Southall Crossrail Station.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are residential, with retail and community proposed at ground floor level and reprovision of a new purpose built gurdwara. The uses will optimise the location, potential and capacity of the site, guided by the need to create a new gateway to Southall that reflects new and improved services and focus of activity at Southall Station.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary corresponds to a smaller part of the existing site allocation, reflecting the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 505 net units (comprising 505 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated net capacity for this site derives from the Tall Building Study Appendix Part 1(EB45A).

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Identified commercial space reflects the need for active frontage, the town centre location and proximity to Southall Station.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	101	101	101	101	101	0	0	0	0	0	505

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed, informed by landowner interest, including early pre-application discussions.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, a nearby SINC and Green Corridor, non-designated industrial uses, the town centre, and regeneration.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within

the site, but there are a number of designated heritage assets close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regards the SINC and Green Corridor, these are separated from the site by built development and road/rail networks making adverse impacts unlikely.

Regarding non-designated industrial uses, future development must satisfy London Plan and Ealing Local Variation Policy E4.

Regarding its town centre and strategic area for regeneration location, the site is a gateway site which offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and provide more affordable homes and new social infrastructure.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include the reprovision of a new purpose-built Gurdwara; public realm, landscaping, greening, highways, and active travel improvements; permeability through the site and improved access to the station; and a new healthcare facility. The IDP identified the need for increased school capacity in the wider Southall area. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit

mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 1.62% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift. The proximity of the Elizabeth line station with frequent rail service will be a major factor in encouraging sustainable travel.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over

the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM108}.

02SO Southall Sidings:

a. the background and how it was identified;

LPA Response: This is a key site within the Southall Opportunity Area and located on the edge of Southall Town Centre, owned by Places for London (Transport for London Property). It is within a ten-minute walk of Southall Station on the Elizabeth Line and several bus routes. The site is bounded to the south by railway tracks and an industrial estate to the east. To the north are two-storey houses with Southall Park and a high school just behind the houses.

The current uses on the site include an auto repair business, and other commercial and light manufacturing businesses.

Planning permission 201888FUL was granted in January 2022 for an affordable and market residential development, following demolition of the existing buildings.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, SOU4 Southall Crossrail Station, and Early Call for Sites.

b. the uses to be permitted and how they are justified;

LPA Response: The uses are residential and industrial, allowing for intensification of the current use, with co-location of residential uses. Development will need to satisfy the requirements of London Plan Policy E4 and Ealing Local Variation Policy E4 H – I for industrial retention, and any co-location of residential uses should achieve industrial uplift.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The site boundary corresponds to a smaller part of the existing site allocation SOU4, and to that of the extant planning permission, reflecting the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 460 net units (comprising 460 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The capacity for this site reflects the extant permission 201888FUL for the comprehensive redevelopment of the site to provide 460 residential units.

e. for commercial development, the estimated floorspace and whether this is

justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Identified commercial space reflects increased population and active frontage.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	169	105	105	81	0	0	0	0	0	0	0	0	0	0	460

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed, informed by scheme specific information regarding the implementation of planning permission 201888FUL. CIL records confirm that works commenced on the site in May 2023. Enabling works were also completed July 2023. Work paused after these enabling works to allow a re-design to account for changes to fire safety regs, via a S96a application (243164NMA). This S96a application resulted in no change to unit numbers and was approved in September 2024. The approved scheme comprises three buildings. Building A comprises 169 units, building B comprises 210 units, and building C comprises 81 units. Although this scheme is progressing further revisions are anticipated for phase B.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage, a nearby SINC and Green Corridor, non-designated industrial uses, the town centre and regeneration.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding heritage, there are no designated or non-designated heritage assets within the site, but there are a number of locally listed buildings close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the SINC and Green Corridor, all of the site is previously developed land but much of the site overlaps or is adjacent to these designations and will likely result in the partial or complete loss of the feature.

Regarding non-designated industrial uses, future development must satisfy London Plan and Ealing Local Variation Policy E4.

Regarding its town centre and strategic area for regeneration location, the site is a gateway site which offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and provide more affordable homes.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm, landscaping, greening, highways, and active travel improvements. The IDP identified the need for increased school capacity in the wider Southall area. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: Loss of non-designated industrial uses on this site reflects the regeneration of Southall centre and improved public transport and development capacity at Southall Station.

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: The Transport Assessment for the site outlines proposals to support sustainable transport and aims to maximise the accessibility of the site to public transport services, most notably at Southall Rail Station. The measures to promote active travel take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. The approved application is for a car-free development and includes a contribution towards the construction of a pedestrian crossing linking the south side of Park Avenue and the site to the entrance to Southall Park, which will be an open, landscaped space with seating for residents and passers-by. Further contributions to support active travel include cycle infrastructure improvements, traffic calming, bus stop improvements, footway improvements, car club provision, and restriction of parking permits. Various pedestrian accesses are proposed connecting the development to adjacent areas via good quality public realm design. A Travel Plan supports measures to promote

sustainable travel to the site and the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM109}.

03SO Former Sorting Office & Kings Hall Methodist Church:

a. the background and how it was identified;

LPA Response: The Former Royal Mail Sorting Office is a highly accessible, key site located on the corner of Beaconsfield Road and South Road in the heart of Southall Town Centre and Southall Opportunity Area. South Road is a busy thoroughfare with a mix of residential and commercial properties. The main high street and Broadway shopping area is located approximately 500 metres to the north along South Road.

The site currently provides a mix of retail, financial services, a restaurant and car park, alongside the Kings Hall Methodist Church, a locally listed building that has fallen into disuse. Redevelopment of the site can offer significant opportunities to rehabilitate an underutilised and dilapidated historic asset as well as provide much needed housing for the borough.

Planning permission PP/2015/4921 was granted in February 2017 to redevelop the Post Office site with a residential led mixed-use development to provide 41 residential units and 10 commercial units on the ground floor. In June 2023, a minor material amendment ref; 222363VAR was granted to the planning permission.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, SOU3 Beaconsfield Road/South Road and through pre application meetings.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are residential, commercial and community. The proposed mix of uses will optimise the site, providing much needed homes for the borough, reprovision of the community/place of worship use and retail/commercial units and help to deliver a successful, sustainable, mixed-use town centre that makes the best use of land.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary corresponds to the area of the existing site allocation that reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 88 net units (comprising 88 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated net capacity for this site derives from the Tall Building Study Appendix Part 2(EB45B). This took precent over the approved scheme PP/2015/4921 on the former sorting office, and estimates arising from ongoing pre-application discussions at Kings Hall.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Identified commercial space will support the town centre and provide active frontage.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	41	0	23	24	0	0	0	0	0	0	0	0	88

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed. Whilst the capacity estimate was informed by the Tall Building Study, regard was had to recent planning activity when approaching phasing. Notably the permission (PP/2015/4921) for the sorting office commenced in January 2020. The recent pre-app activity relating to Kings Hall provides a useful indicator of readiness.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage and the town centre location.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding heritage, the site contains a locally listed building which should be retained and refurbished.

Regarding its town centre location, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include highways, public realm, landscaping, greening, and active travel improvements. The IDP identified the need for increased school capacity in the wider Southall area. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: The measures to promote active travel take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. A Travel Plan supports measures to promote sustainable travel to the site and supports the behaviour change required for modal shift. The proximity of the Elizabeth line station with frequent rail service will be a major factor in encouraging sustainable travel.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM110}.

04SO Southall West London College:

a. the background and how it was identified;

LPA Response: Southall West London College is a highly accessible key site located on Beaconsfield in the heart of Southall Town Centre and Southall Opportunity Area. Its current uses include a post-16 high education facility with an associated sports centre and community uses.

The surrounding area contains a mix of residential and educational uses with commercial uses in Southall town centre further to the east. Adjoining the site to the east, the construction of a new residential development comprising 118 flats is underway on land that once formed part of Southall Community College that was deemed surplus to requirements – see planning permission 203705FUL granted in May 2021.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, SOU3 Beaconsfield Road/South Road.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are residential, education and community, which will provide much needed homes for the borough, and improved education and community facilities to help deliver a successful, sustainable mixed-use town centre that makes the best use of land.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary takes into account the planning permission granted on part of the larger existing site allocation (203705FUL) that has now commenced, and which effectively separates this part of the existing site allocation SOU3 from proposed site allocation 03SO Former Sorting Office & Kings Hall Methodist Church, reflecting the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 103 net units (comprising 103 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

This allocation now excludes the area permitted under 203705FUL. The anticipated capacity for this site has been calculated using the R19 capacity calculator tool,

which assumed the full redevelopment of the site for a mix of uses including residential. Further detail about this tool is explained on page 14 of EB73.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: N/A

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	34	34	35	0	0	0	0	0	0	0	103

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed, informed by activity across the wider area.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage and the town centre location.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within

the site, but there is a locally listed building adjacent to the site requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding its town centre location, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include education and social infrastructure and flood risk mitigation (surface water). The IDP identified the need for increased school capacity in the wider Southall area. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified

mitigation will be effective;

LPA Response: A site assessment was prepared for this allocation as part of the Level 2 SFRA because the extent of the site area falling with flood zones 2 or 3 exceeded the screening thresholds of 0.49% for fluvial sources and or 7.5% for surface water sources. The screening assessment at appendix A of the Level 2 SFRA (EB97) details the extent of overlap as a percentage of the site area. The extent of the site area falling within flood zone 3a (surface) is 13.63% exceeding the threshold for surface sources and triggering a site assessment. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial). As noted in the response to Q8 Section 2.5.2 of the IIA summarises the application and cumulative findings of the sequential and exception tests. This concluded that the sequential test has been applied appropriately, and for all cases where triggered the exception test (both parts) was passed. A site assessment proforma for this allocation site is included at appendix B of the Level 2 SFRA. This addresses a number of matters including classifying vulnerability, summarising risk, identifying flood defences, assessing risk for each source, describing the flood mechanism, identifying safe entry and exit routes, identifying mitigation measures, and confirming if site will be safe over its lifetime (as per the exception test). Key findings for this allocation can be summarised as follows:

- No fluvial or tidal risk.
- The Exception Test is required for this site as 13.63% of the site area is within Flood Zone 3a (surface water) and the proposed vulnerability classification is 'More vulnerable'.
- Can pass clause B of the exception test.
- The site is at high risk of surface water flooding, particularly in the south-western and western sections of the site, as well as along the southern boundary. Development should be directed away from the south-western, western, and southern areas of the site where there is higher risk of surface water flooding.

Reflecting these findings additional text has been added under the contextual considerations section of the allocation text, drawing out those elements of the evidence which may impinge on the design and layout of any future proposal on this site. The measures/design solutions are deemed to be achievable within the context of the wider allocation parameters. For ease of reference the relevant text is set out here:

> *'The site is at risk of surface water flooding, particularly in the south-western and western sections of the site, as well as along the southern boundary. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.'*

As addressed elsewhere the allocations omit capacities. The capacities employed for

the trajectory either reflect permitted or pending schemes which have already been informed by site specific flood risk assessment or are based on design-based work or capacity calculations which has typically employed conservative assumptions. At a high level this has considered environmental constraints including flood risk, which has moderated the developable area, and will have had a bearing on capacity estimates.

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: The Transport Statement for the site outlines proposals to support sustainable transport and aims to maximise the good accessibility of the site to public transport services including Southall Rail Station and numerous local bus routes. The proximity of the Elizabeth line station with frequent rail service will be a major factor in encouraging sustainable travel.

The measures to promote active travel take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. A total of 202 sheltered cycle parking spaces will be provided, which is in accordance with London Plan standards to encourage sustainable travel. The redevelopment is car-free, with a reduction of 64 car parking spaces on-site. A revised Green Travel Plan supports the measures to promote sustainable travel to the site and the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM111}.

05SO 31 – 45 South Road & Tel Exchange, Quality Foods & Iceland:

a. the background and how it was identified;

LPA Response: This is a key site in Southall Opportunity Area and Strategic Area of Regeneration, vital to the provision of new homes and employment uses in Southall Town Centre. The site is located on South Road and comprises a range of retail, including a supermarket, commercial, office and residential uses, a substantial surface level car park and a telephone exchange.

Most of the site fronting South Road is a Secondary Shopping Frontage, and the paved area in front of Iceland regularly hosts market stalls. The buildings are low rise, and apart from the telephone exchange do not make a positive contribution to the streetscape.

The site is highly accessible and occupies a key location on the route from Southall Station to the specialist shopping area concentrated around The Broadway. Development of the site will enable desired public realm improvements and measures to improve permeability through the site.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, SOU2 Iceland, Quality Foods and 63 – 95 South Road.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are residential, with retail/commercial at ground floor level and community. There is an opportunity to optimise the capacity of the site to provide much needed housing for the borough and a range of new, higher quality retail/commercial units in a variety of sizes to meet occupier requirements. The uses will help to deliver a successful, sustainable, mixed-use town centre that makes the best use of land.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The site boundary includes part of the existing SOU2 allocation, excluding the housing to the south, and encompasses the area to the north of the site, including the telephone exchange. The site boundary reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 142 net units (comprising 148 gross gains and 6 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply.

The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units where present.

The anticipated net capacity for this site derives from the Tall Building Study Appendix Part 2(EB45B), with adjustments made to account for the loss of existing units.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Identified commercial space will support active frontage on this key shopping street.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	0	35	35	36	36	0	0	0	0	142

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 29. It was noted also that complex land assembly may impact timing of delivery.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, the town centre location and regeneration.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**
LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but there are a number of designated heritage assets close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding its town centre and strategic area for regeneration location, the site is a strategic site which offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and provide more affordable homes and new social infrastructure.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**
LPA Response: The site's infrastructure requirements include social infrastructure; highways, public realm, landscaping, greening, and active travel improvements; and measures to improve permeability through the site. The IDP identified the need for increased school capacity in the wider Southall area. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 5.19% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable

housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM112}.

06SO Fairlawn Hall and Science of the Soul College:

a. the background and how it was identified;

LPA Response: Fairlawn Hall and Science of the Soul College were two separate sites submitted to the council through the Call for Sites. As the sites are located adjacent to each other, they were combined into one larger site to allow for a more comprehensive development.

The site is located near the corner of the High Street and Lady Margaret Road, with direct access from both roads. The site consists of the Fairlawn Hall building that was previously occupied by the Southall Conservative and Unionist Club, now occupied by a college and training institute, an office, a surface car park, and the Science of the Soul College in a building which occupies the eastern half of the site.

The site is located within the Southall Opportunity Area and the Southall Town Centre and benefits from a PTAL rating of 6a, making it highly accessible by public transport.

The site is bounded to the north by the North Primary School grounds, to the east by a recent mixed-use development with residential flats above retail and commercial units on the ground floor. Southall Fire Station is located to the south on the High Street, and to the west is the Vishwa Hindu Mandir. The wider area is of mixed character with residential properties further west, north and east, and more commercial, cultural and educational facilities along the High Street.

As mentioned above, the site was identified through the Early Call for Sites and Reg 18 Call for Sites.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are residential, with offices, education and community suitable to its town centre location. The uses will help to deliver a successful, sustainable, mixed-use town centre that makes the best use of land.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary encompasses both sites that were submitted through the Early Call for Sites and Reg 18 Call for sites. The joining of the two sites will enable a more comprehensive development which could benefit from a masterplan approach.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 184 net units (comprising 186 gross gains and 2 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this ‘Large’ site allocation geography to our future supply.

The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool, which assumed full redevelopment of the site for residential with a smaller component of other uses. Further detail about this tool is explained on page 14 of EB73.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Identified commercial space will support the town centre and active frontage.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	0	46	46	46	46	0	0	0	0	184

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 29.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal

with heritage, archaeology and the town centre location.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding heritage, there are no designated or non-designated heritage assets within the site, but there are a number of designated heritage assets close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding archaeology, the site is within an Archaeological Priority Area. Further consultation with either GLAAS or a conservation heritage advisor will be required over any future development proposals.

Regarding its town centre location, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include social infrastructure, (including healthcare); highways, public realm, landscaping, greening, and active travel improvements; and measures to improve permeability through the site. The IDP identified the need for increased school capacity in the wider Southall area. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning

constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over

the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM113}.

07SO The Limes, Maypole Court, Banqueting Centre, 13 – 19 The Green:

a. the background and how it was identified;

LPA Response: The site, which is in public and private ownership, is located on The Green just south of Southall Station and sits at the main gateway to the King Street Neighbourhood Centre and its associated amenities and is also a short walk south of the larger Southall Town Centre. The surrounding area contains a mix of uses, including industrial and warehousing units located within large premises in Southbridge Way LSIS to the west, and residential properties to the south. To the east and north are a number of major residential-led high-density mixed-use developments which are now commenced or reaching completion. Middlesex Business Centre, a major brownfield site to the east is being proposed for allocation (see 08SO).

Current uses on the site include a 3-storey building which was previously in use as a bank (13 – 15 The Green) which is locally listed, a dementia care facility, residential housing, and the locally listed Beaux Art Style Southall Community Centre, now a popular banquet hall in the east.

Planning permission 216215FUL was granted in February 2024 for demolition of the existing buildings (13 – 15 The Green) and construction of a part 23 storey, part 19 storey and part 14 storey building to provide 95 residential units.

Planning application 223246FUL for construction of a part 6, part 8, part 10, part 16 and part 22 storey mixed-use development with part basement, comprising community/commercial uses on the ground and mezzanine floors and 215 flats above; with new access road along the southern boundary off Merrick Road (following demolition of existing building, Southall Community Centre) is pending consideration.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, SOU6 Southall East and an Early Call for Sites submission.

b. the uses to be permitted and how they are justified;

LPA Response: The uses proposed are residential, health facility, community and commercial/retail. The proposed uses will replace vital health and community uses, much needed homes and retail/commercial on the ground floor to create an active frontage on this key site. The mix of uses will help to deliver a successful, sustainable development that makes the best use of land.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary includes a small part (The Limes) of existing site allocation SOU6 - with the addition of areas to the west and east of The Limes to facilitate a more comprehensive development. The site boundary reflects the

council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 422 net units (comprising 458 gross gains and 36 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

The anticipated capacity for this site has been informed and calculated using a combination of sources, including:

- An extant permission 216215FUL for 96 units at 13-15 The Green relating to the western end of the site. Revised plans increased unit total from 95 to 96 units. The original bedsits at this site have long been vacant are not habitable and therefore are excluded from any existing unit count. Note this extant scheme has effectively been superseded by recent permission 243547FUL for student accommodation at 13-19 The Green. For now, 243547FUL is excluded from capacity calculations, as application received in September 2024 and approved March 2025. The capacity calculations for this allocation will be updated in the next iteration of the housing trajectory.
- The Tall Building Study (Part 2 – EB45B) which relates to the entirety of the allocation site, but for the purposes of calculating capacity, intentionally omits 13-15 The Green which is addressed separately above. This study provides a capacity estimate of 362 units (gross) encompassing the banqueting hall, Maypole Court and The Limes. It should be noted that with respect of ascertaining capacity this study takes precent over the pending application 223246FUL for the redevelopment of the banqueting hall to the eastern side of the site. With respect of existing units anticipated to be lost across the site, it is noted that Maypole Court comprises 16 self-contained units, and the Limes comprises a 20-bed special care unit. Combined this equates to 36 conventional units to be lost. The net total for this part of the allocation is 326.

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Identified commercial space will support the neighbourhood centre.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	48	48	0	0	0	0	0	0	0	0	0	0	96
0	0	0	0	0	107	108	55	56	0	0	0	0	0	0	326
0	0	0	48	48	107	108	55	56	0	0	0	0	0	0	422

Each component of the supply (conventional pipeline and allocation) has been phased separately, but regard has been had to each in doing this. Bespoke phasing was employed for the extant permission, with this capacity being spread over 2 years informed by applicant input. As noted under 'a' above permission has recently been given for an alternative scheme on this site (student accommodation). This permission has not been accounted for as part of this latest trajectory but will be incorporated as part of a future update. With regard to the rest of the site, which makes up the majority of the site area, the capacity estimate derived from the Tall Building Study has been assigned based on a bespoke approach. The existence of a pending scheme on part of the site (the banqueting hall) has informed the distribution of this capacity, although none of this capacity is currently treated as 'deliverable'.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, a nearby SINC and Green Corridor, town centre location and regeneration.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there is a locally listed building or site and others nearby requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regards the SINC and Green Corridor, these are separated from the site by built development and road/rail networks making adverse impacts unlikely.

Regarding its town centre and strategic area for regeneration location, the site is a strategic site which offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and provide more affordable homes and social community infrastructure.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include social infrastructure (including healthcare); highways, public realm, landscaping, greening, and active travel improvements; and measures to improve permeability through the site. The IDP identified the need for increased school capacity in the wider Southall area. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2

-Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: The Transport Assessment for the site outlines proposals to support sustainable transport and aims to maximise the good accessibility of the site to public transport services, most notably at Southall Rail Station. The measures to promote active travel take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. No car parking spaces are proposed on-site, and a bike lift provides improved access to basement parking proposed for cyclists. The approved application is for a car-free development and proposes provision of a zebra crossing directly outside the site for pedestrians to cross The Green.

A Travel Plan supports measures to promote sustainable travel to the site and the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM114}.

08SO Middlesex Business Centre:

a. the background and how it was identified;

LPA Response: Middlesex Business Centre is a key site in the Southall Opportunity Area and Strategic Area of Regeneration. The site is located within walking distance of Southall Town Centre and Southall Station.

The existing site was once home to the Maypole Margarine works, which was largely demolished in the early 1980s. The site is bordered by the railway to the north, the redevelopment of the Arches Business Centre, proposes site allocation 07SO and residential housing to the west, Hortus Cemetery (Community Open Space) to the south, and Bridge Road Industrial Site (LSIS) to the east. Much of the original Maypole Margarine factory that once occupied the site has been demolished leaving the Sunrise Radio building, a locally listed heritage asset and a portion of the original factory facade along the western boundary.

The site is currently occupied by a mix of partly vacant and underutilised commercial / light industrial units and offices. These vary between two and three storeys defining the current scale of the site. The Sunrise Radio building is prominent at the end of Merrick Road rising to five storeys.

Redevelopment of the site will provide a number of local benefits including a new public park and other open spaces, new connections between the Southall town centre, Glade Lane Canalside Park, Grand Union Canal and existing neighbourhoods, particularly the Havelock Estate.

Outline Planning permission 183673OUT was granted in November 2019 for 2,083 residential units, hotel, flexible retail, office and community space, with the retention, refurbishment and alteration of the Sunrise Radio Building and Maypole Margarine Factory façade, and a new internal road network connecting with the existing road network.

Application for the Approval of Reserved Matters 224785REM was approved in November 2023, relating to Development Plots A and B.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, SOU6 Southall East.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are residential, hotel, retail/commercial and community. The uses will help to deliver a successful, sustainable, mixed-use development that makes the best use of land.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary correlates to part of the existing site allocation, reflecting the extant planning permission, and includes Charles House to the south east. The site boundary reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 2083 net units (comprising 2083 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated capacity for this site reflects the extant permissions relating to this site. 2083 units were approved in outline under 183673OUT. This has taken precedent over the capacity output generated under the Tall Building Study. Of this total 867 units have now been approved in detail under reserved matter application 224785REM.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation, but this site forms a major new centre mixed-use typology area for mixed-use is which should generate its own demand for commercial space, particularly this close to Southall Station.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	243	0	729	244	0	0	0	0	0	0	0	1216
0	0	0	0	0	867	0	0	0	0	0	0	0	0	0	867
0	0	0	0	243	867	729	244	0	0	0	0	0	0	0	2083

Each component of the supply has been phased separately, but regard has been had to each in doing this. Bespoke phasing has been employed informed by recent planning activity. An LDC application (243387CPL) has confirmed the intention of the applicant to implement overall works on this site (via demolition) before November 2025. The applicant has also submitted details (243386CND) of their indicative programme of phasing, which has informed the table above. This details that works are to be programmed over 7 phases (within a four-year period), including specific phasing for plots A and B covered under 224785REM.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, a nearby SINC and Green Corridor, nearby SIL and LSIS and regeneration.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there is a locally listed building or site and others nearby requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the SINC and Green Corridor, the site is likely to have limited indirect or no effect on as the features could likely be retained or effects mitigated.

Regarding the nearby SIL and LSIS, the proposed use is for mixed use scheme that incorporates a portion of commercial development that could provide a helpful transition between the neighbouring industrial uses.

Regarding its strategic area for regeneration location, the site offers an opportunity, for example, to optimise the use of the land, provide more affordable homes and new social infrastructure.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include social infrastructure (including healthcare); new road and highways improvements; public realm, landscaping, and greening improvements; and measures to improve permeability and active travel. The IDP identified the need for increased school capacity in the wider Southall area. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: Loss of non-designated industrial uses on this site forms an essential of the regeneration and development capacity for Southall, originally identified in the OAPF.

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 1.47% only. No part of the site falls within flood

zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: The Transport Statement for the approved RMA outlines proposals to support sustainable transport alongside a Transport Implementation Strategy, which seeks to reduce dependence on travel by private car and actively influence travel to and from the site, and a full TA in support of the outline planning application.

A key element of the development is the introduction of or contribution towards infrastructure to encourage sustainable travel. This includes new bus stops to bring buses into the scheme. The developer was required to contribute to TfL to fund the extension of a bus route through the site, provide two bus stops, and improve existing bus services. The development will deliver a new road known as Healum Avenue, with a design using Healthy Streets principles that would promote walking and cycling as a preferred choice, e.g., with a segregated cycleway. The proximity of the Elizabeth line at Southall Rail Station with frequent rail service will also be a major factor in encouraging sustainable travel, with a direct and convenient route provided along Healum Avenue. The development will make a further financial contribution towards strategic transport improvements to assist in delivering schemes such as the cycle/footbridge over the rail line between Merrick Road and Park Avenue.

The measures to promote active travel take into account the very good PTAL of the site and active travel schemes in the vicinity (existing and proposed) and require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. A Travel Plan supports measures to promote sustainable travel to the site and the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range

of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM115}.

09SO Havelock Estate:

a. the background and how it was identified;

LPA Response: Havelock Housing Estate, owned by the council, is located in the southern part of Southall, on the border with the London Borough of Hounslow. The estate was built in the 1950s and 1970s and has a total of 845 homes, a mix of 2- and 3-storey terraced and semi-detached houses and 3-storey flat blocks. The estate is bounded by industrial uses to the north and the Grand Union Canal to the south. Havelock Primary School, Bixley Field and allotments are situated to the west of the site and new homes to the east.

The council's 2008 estates review highlighted that Havelock Estate needs a lot of work to address the improvements needed to bring it up to the government's Decent Homes standard. The review identified the following issues at the estate: problems with construction and design of different housing types on the estate; resident satisfaction is low; anti-social behaviour and poor security; overcrowding. The estate is made up of different types of housing, each with different building problems. There is only one access route in and out of the estate with limited transport links and access to local shops.

Outline planning permission PP/2013/3241 was granted in April 2015 for the phased demolition of 692 existing residential units, seven commercial units with 490sqm floor space in A1 (retail) and D1 (non-residential institutions) use classes and other associated structures; the retention of 154 existing residential units and the phased construction of a maximum of 922 new residential units in a mixture of apartment buildings varying between four and eight storeys high and two, three and four storey houses; 840sq.m floor space in commercial use (A1/A3 Use Classes); 280sq.m floorspace in D1 (non-residential institutions) use class (Phases 1 – 4).

Planning permission PP/2013/3242 was granted in April 2015, Phase 1 of the Estate regeneration, for the demolition of 156 existing residential units and other associated structures; the retention of 30 existing residential units and the construction of 287 new residential units in six apartment buildings between four and eight storeys high and two and three storey houses; 70sq.m floor space in retail use (A1 Use Class) and 280sq.m floor space in community use (D1 Use Class).

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, SOU7 Havelock Estate.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are residential, community and retail to ensure the regeneration of the Estate provides new and improved housing for existing and new residents, and to deliver a successful, sustainable redevelopment that makes the best use of land.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary corresponds to the remaining phases of the extant planning permissions that are still to be developed and reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 99 net units (comprising 635 gross gains and 536 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

The capacity for this site reflects the unimplemented component of the live permission PP/2013/3241. This outline permission covered all 4 phases of this estate renewal project. Phase 1 approved in full under PP/2013/3242 & 190163NMA has been completed and sits outside of the allocation area. The site boundary relates to phases 2-4 only which are approved in outline at this stage. Whilst it is anticipated that a revised scheme will be submitted for phases 2-4 further details are not available regarding this at present. For now, we have defaulted to using the unimplemented capacity total from PP/2013/3241.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led." Identified commercial space reflects significant population growth and partially self-contained nature of the proposed development, which expected to generate local demand.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	19	20	20	20	20	0	0	0	0	0	99

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed. As noted above, phases 2-4 are subject to an outline permission only at this stage. Whilst it is anticipated that a revised scheme will be submitted for phases 2-4, the timing of this is unclear at present, although it remains a committed project for the Council. It is acknowledged that additional delivery is not anticipated in years 1-5. Phasing distribution has also had regard to the gross total in this instance.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, archaeology, green space designations, nearby LSIS and regeneration.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but there is an adjacent conservation area and locally listed close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding archaeology, the site is within an Archaeological Priority Area. Further consultation with either GLAAS or a conservation heritage advisor will be required over any future development proposals.

Regarding green and blue space designations, the site contains the Canalway Park Public Open Space and the Grand Union Canal Blue Ribbon Network. Design principles require the creation of new public spaces including new children's play spaces with the canal and Canalway Park acting as focal public spaces and new green links to the canal and improvements to the canal towpath.

Regarding the nearby LSIS, the proposed use is for mixed use scheme that that could provide opportunities for a helpful transition between the neighbouring industrial uses.

Regarding its strategic area for regeneration location, the site offers an opportunity, for example, to optimise the use of the land, provide more affordable homes and new social infrastructure.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm, landscaping, and greening improvements; play space facilities; and measures to improve permeability, active travel, and green links. The IDP identified the need for increased school capacity in the wider Southall area. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 3.54% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: As outlined in the Transport Assessment for the outline planning application, a set of sustainable transport measures will be implemented as part of the development proposals. These measures include secure cycle parking and provision of spaces in line with the London Plan standards, pedestrian improvements (including implementation of the Legible London scheme), and improvements to pedestrian crossing points. The proposed development will lead to enhanced north-south pedestrian connections towards Southall station and east-west cycle connections towards Ealing and Hayes & Harlington. By limiting parking provision, residents will be encouraged to rationalise car use and use sustainable travel modes.

The measures to promote active travel take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. A Residential Travel Plan supports the measures to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land

value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM116}.

10SO The Green:

a. **the background and how it was identified;**

LPA Response: The site is located in the southern part of Southall and forms the interface between Southall Station and the heart of the King Street neighbourhood centre, containing a varied mix of uses, at a comparatively low density. The site includes a large surface level car park behind the library and a locally listed building - Works, formerly stable and coach house opposite Osterley Park Road. The site is opposite the Grade II listed Manor House and Grade II listed Southall First World War Memorial.

The LSIS immediately to the north is expected to come forward for plan-led mixed intensification in line with Policy.

Planning application 215058FULR3 was granted permission in September 2022 for demolition of existing buildings and mixed-use redevelopment (phased) to provide residential, flexible commercial, employment and community floorspace, with associated public realm and landscaping, play and amenity space.

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, SOU8 The Green.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are for residential with flexible commercial, employment and community. The uses will complement the existing uses adjacent to the proposed site allocation (library, place of worship, retail, banqueting and restaurants) and help to deliver a successful, sustainable, mixed-use neighbourhood centre that makes the best use of land.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary corresponds to the extant planning permission and is a smaller area of the existing site allocation. The proposed boundary excludes the area of LSIS, the library and some retail along the edge of the site and reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 564 net units (comprising 564 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated capacity for this site reflects that approved under the extant permission (215058FULR3) for this site. This has taken precedent over the capacity output generated under the Tall Building Study.

The Council has consistently used the best available sources to determine the anticipated capacity contribution of each allocation geography.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Identified commercial uses reflect the location within the neighbourhood centre, the key active frontage onto the green, and the substantial size of the proposed residential component which should generate additional demand.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	242	216	106	0	0	0	0	0	0	0	0	0	564

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed having regard to scheme specific information and progress. The site is subject to a CPO which was approved April 2023. The scheme (215058FULR3) is to be progressed over 3 phases. Block A 242 units. Block B 216 units. Block C 106 units.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, archaeology, a nearby Green Corridor, non-designated industrial uses, nearby LSIS, the town centre and regeneration.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there is a locally listed building on site and others nearby together with other designated heritage assets requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding archaeology, the site is within an Archaeological Priority Area. Further consultation with either GLAAS or a conservation heritage advisor will be required over any future development proposals.

Regarding the Green Corridor, the site is likely to have limited indirect or no effect on as tit is separated from site by built development and road/rail networks.

Regarding non-designated industrial uses, future development must satisfy London Plan and Ealing Local Variation Policy E4.

Regarding its town centre and strategic area for regeneration location, the site is a strategic site which offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and provide more affordable homes and social community infrastructure.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public realm, landscaping, and greening improvements; and measures to improve permeability and active travel. The IDP identified the need for increased school capacity in the wider Southall area. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the

borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: The current non-designated industrial uses are heavily fragmented and conflict with the existing town centre, they are not considered to have significant capacity for reuse and intensification.

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 0.13% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: The Transport Assessment for the permitted development on the site includes measures to encourage active and sustainable travel, such as a reduction in

public car parking spaces, improvement of pedestrian and cycle permeability throughout the site, footway widening, and secure on-site cycle parking. The proposed non-residential uses will not be provided with any on-site car parking. Furthermore, the site is located in a Controlled Parking Zone. The proximity of the Elizabeth line at Southall Rail Station with frequent rail service will be a major factor in encouraging sustainable travel.

The measures to promote active travel take into account the good PTAL of the site and active travel schemes in the vicinity (existing and proposed) and require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. A Travel Plan supports the measures, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM117}.

11SO The Green Quarter:

a. **the background and how it was identified;**

LPA Response: The Green Quarter is a major regeneration scheme located on the former Southall Gasworks, with the eastern part of the existing site allocation currently under construction, with 680 residential units built to date. The Green Quarter development is one of the most complex regeneration programmes in the country. Due to its historical use as a gasworks and chemical works site from the 19th century until the late 1960s, there was contamination of the soil which has been treated in a soil hospital to make the land safe and suitable for its new uses, including housing.

The site is partially located within Southall Town Centre and close to Southall Station on the Elizabeth Line. It is bounded by housing terraced housing and the Blair Peach Primary School to the north, the Paddington Branch of the Grand Union Canal to the west, bordering the London Borough of Hillingdon and Minet Country Park, and a railway line to the south. To the east of the site is the area of the existing site allocation that is currently developed or under construction.

In August 2021, the first phase of a new public park (one of two) opened, called Central Gardens. The park has new trees and an amphitheatre and is used for local community events.

Initial planning permission was granted in September 2010 - P/2008/3981 for residential development, leisure/cinema, food and non-food retail, hotel with conference and banqueting facilities, multi storey car park, health care, education, office/studio units, sports pavilion, energy centre, a new access road from the Hayes Bypass, and footbridge over the Grand Union Canal to Minet Country Park.

There have been several consented planning applications since 2010 including PP/2015/2582, 171562VAR and 178801FUL. Planning application 234110OUT was granted permission in May 2025 for a comprehensive phased redevelopment to provide new homes, flexible commercial uses (Use Classes E and F1 and Sui Generis drinking establishment), education uses, new sports hall, energy centre, associated cycle and vehicle parking, landscaping, public realm open space and children's play space. The outline permission comprises a new masterplan for the land formally referred to as Phases 4 to 9 of outline planning permission originally granted in 2010 and subsequently revised (ref: 171562VAR).

The site was identified through its allocation in the adopted Development Sites DPD 2013 {EB2}, SOU5 Southall West, and extant planning permissions.

b. **the uses to be permitted and how they are justified;**

LPA Response: The uses are for residential, employment, school, health centre, sports, energy centre, new public open space and a new canal crossing. This will help

to deliver one of the largest redevelopments in a successful, sustainable and one of the largest regeneration projects in the country, extending Southall Town Centre with a successful, sustainable mixed-use development that makes the best use of land.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary corresponds to remaining undeveloped area (phases 4 – 9) of the extant planning permission and reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 2140 net units (comprising 2140 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no pre-existing residential units present within the allocation site.

The capacity for this site reflects the pending scheme 234110OUT (with resolution to grant but awaiting legal agreement) pertaining to phases 4 to 9 of this wider regeneration project. Phases 1 to 3 sit outside of the allocation boundary. Phase 1 is complete. Phase 2 (185158REM / 201123NMA / 216077REM) has yet to commence and is recorded separately in the trajectory as part of the permitted pipeline. Phase 3 (205101REM) is nearing completion and again is accounted for separately under the pipeline at present.

The latest outline scheme for phases 4 to 9 proposes 5566 units. Reflecting the scale of the scheme the Environmental Statement (section C4.0) accompanying the outline scheme estimates that development will take approximately 27 years. This indicates that works are expected to commence in May 2027 and conclude by March 2055. Given the extended development programme only a portion of the 5566 units proposed will be completed during the life of this plan (i.e. until 2038/39). Noting the anticipated commencement in May 2027, it is assumed that the delivery of the first units built under these phases would not complete before May 2029. For the purpose of populating the trajectory, and in the absence of other information, the overall capacity (5566) was split equally across 26 years up to and including 2054/55. This would average around 214 units per annum. Of this total 2140 units are anticipated to complete by the end of the plan period.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: Commercial use on this site has been heavily tested as part of the current master planning process. This has seen a reduction in planned commercial provision and the anticipated questionable is considered well justified by available evidence.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	214	214	214	214	214	214	214	214	214	214	2140

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed having regard to scheme specific information and progress. As noted under the response to 'a' above an Environmental Statement accompanying the outline scheme estimates that development will take approximately 27 years. This indicates that works are expected to commence in May 2027 and conclude by March 2055. Given the extended development programme only a portion of the 5566 units proposed will be completed during the life of this plan (i.e. until 2038/39). Noting the anticipated commencement in May 2027, it is assumed that the delivery of the first units built under these phases would not complete before May 2029. Noting this, the capacity has been assigned equally to years 6 to15.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, green and blue space designations and the town centre location.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within

the site, but it is adjacent to a conservation area and there are a number of designated heritage assets close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding green and blue space designations, the site is likely to have limited indirect or no effect as features could likely be retained or effects mitigated.

Regarding its town centre location, the site offers an opportunity, for example, to optimise the use of the land and enhance the role of the town centre by boosting footfall and promoting a more diverse retail offer.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include community facilities; a school; health centre; sports hall; public open space; energy centre; canal crossing; green links; highway improvements; and flood risk mitigation (surface water). The IDP identified the need for increased school capacity in the wider Southall area. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: This non-designated former industrial site is subject to a permission for change of use dating back over a decade.

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: A site assessment was prepared for this allocation as part of the Level 2 SFRA because the extent of the site area falling with flood zones 2 or 3 exceeded the screening thresholds of 0.49% for fluvial sources and or 7.5% for surface water sources. The screening assessment at appendix A of the Level 2 SFRA (EB97) details the extent of overlap as a percentage of the site area. The extent of the site area falling within flood zone 3a (surface) is 10.72% exceeding the threshold for surface sources and triggering a site assessment. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial). As noted in the response to Q8 Section 2.5.2 of the IIA summarises the application and cumulative findings of the sequential and exception tests. This concluded that the sequential test has been applied appropriately, and for all cases where triggered the exception test (both parts) was passed. A site assessment proforma for this allocation site is included at appendix B of the Level 2 SFRA. This addresses a number of matters including classifying vulnerability, summarising risk, identifying flood defences, assessing risk for each source, describing the flood mechanism, identifying safe entry and exit routes, identifying mitigation measures, and confirming if site will be safe over its lifetime (as per the exception test). Key findings for this allocation can be summarised as follows:

- No fluvial or tidal risk.
- The Exception Test is required for this site as 10.72% of the site area is within Flood Zone 3a (surface water) and the proposed vulnerability is 'More vulnerable'.
- Can pass clause B of the exception test.
- Surface water is expected to pond at multiple locations throughout the site, particularly around Seva Drive running through the centre.
- The site is located within 5m of an Ordinary Watercourse

Reflecting these findings additional text has been added under the contextual considerations section of the allocation text, drawing out those elements of the evidence which may impinge on the design and layout of any future proposal on this site. The measures/design solutions are deemed to be achievable within the context of the wider allocation parameters. For ease of reference the relevant text is set out here:

> *'Land along the Grand Union Canal to the north-west of the site, is predicted to be at risk from surface water flooding. Surface water is expected to pond at multiple locations throughout the site, particularly around Seva Drive running through the centre. The site is located within 5m of an Ordinary Watercourse.*

The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.'

As addressed elsewhere the allocations omit capacities. The capacities employed for the trajectory either reflect permitted or pending schemes which have already been informed by site specific FRAs as is the case here or are based on design-based work or capacity calculations which has typically employed conservative assumptions.

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: As described in the Transport Assessment for the outline planning permission (234110OUT), the proposed development will continue to improve pedestrian, cycle, and public transport connections, and permeability across the site, as well as providing a high-quality public realm within the site. It includes the following design measures to support sustainable travel objectives: pedestrian and cycle access, new active travel facilities, high-quality permeable development, car parking restrictions, and a bus gate. Public realm improvements, landscaping, open space and children's play space are also part of the design.

The 95 bus route will be diverted to serve the site, completing a loop on the site as part of its route to provide convenient access to Southall station, the town centre and other destinations. A bus only-section will be introduced on the Spine Road, which will improve bus journey times.

Off-site improvements will be funded through planning obligations, with a Transport Management Fund set up to provide measures to improve accessibility for pedestrians, cyclists and bus users together with satisfactory access, parking and servicing. This spending will be collaboratively determined through a Transport Review Group (made up of representatives from the developer, Ealing Council, Hillingdon Council and TfL). The fund includes 6 improvement schemes for the wider area, on South Road, Beaconsfield Road, Park Avenue, and various other local streets.
Two consented footbridges over the Grand Union Canal will be delivered as part of the development, providing access to green spaces in Minet Country Park. Two existing underpasses connecting with Dudley Road and Brent Road will be upgraded and will provide pedestrian and cycle connection only.

Furthermore, the development will contribute to Ealing's Get Southall Moving programme, which includes infrastructure improvements to improve bus journey times and encourage more walking and cycling along key corridors in Southall – particularly Western Road, South Road, Merrick Road and Avenue Road. Bus priority and bus stopping arrangements on Western Road, The Green and the South Road bridge will be improved, along with provision of segregated cycling facilities on Merrick Road and Avenue Road.

Overall, the proposed development will maximise the sustainable transport opportunities at the site, including its proximity to Southall Rail Station and the Grand Union Canal and seek to deliver Healthy Streets where users are encouraged to travel by active modes and public transport. The measures to promote active travel take into account the PTAL (which varies across the site due to its size), active travel schemes in the vicinity (existing and proposed), and require alignment with all relevant policies of the London Plan, including car parking and cycle parking provision. Reduced car parking compared to the extant scheme (maximum 0.3 spaces per dwelling compared to 0.7 spaces per dwelling) supports mode shift aspirations.

A Travel Plan supports the measures to promote sustainable travel to the site and the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM118}.

12SO Scotts Road Trading Estate:

a. **the background and how it was identified;**

LPA Response: The site forms the backland to low-rise residential terraces and semis on Scotts Road and Emerald Square. It is located to the south west of Southall Town Centre and the site is dominated by surrounding residential uses. The existing uses are vehicle intensive and much of the site is taken up with parking and vehicle storage. There is a small church next to the entrance to the site on Western Road with a parade of shops and restaurants across from the entrance (primary shopping frontage).

The site was identified through the London SHLAA 2017.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are residential with some industrial. The current uses are not compatible with the surrounding residential uses and redevelopment with residential units will provide much needed housing for the borough as well as a better environment for the surrounding community. Some industrial uses that are compatible with residential uses will be acceptable, to reprovide employment uses.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary corresponds to the extent of the trading estate and reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 92 net units (comprising 92 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no existing residential units present at the site.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool, which assumed a mix of uses for this site including residential and industrial. Further detail about this tool is explained on page 14 of EB73.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Mixed use provision is made to allow provision that reflects the character and current occupancy of the site.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	30	31	31	0	0	0	0	0	0	92

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 28.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with non-designated industrial uses.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding non-designated industrial uses, future development must satisfy London Plan and Ealing Local Variation Policy E4.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public realm, landscaping, and greening improvements. The IDP identified the need for increased

school capacity in the wider Southall area. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: The current non-designated uses are quasi-industrial, and some reprovision is expected by the allocation

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in

the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No.

13SO Endsleigh Industrial Estate:

a. the background and how it was identified;

LPA Response: The site is located on the Grand Union Canal at the edge of the borough, bordering the London Borough of Hounslow. The site is the remaining industrial portion of a former larger concentration of industrial uses next to the canal and includes Adelaide Dock Yard, which is in active use, and is owned and managed by the Canal and River Trust. Adelaide Dock Yard provides essential operational services for the maintenance of the Canal including deliveries, and boat removals and is a key disposal site for London weed removed annually. Other uses include industrial, small businesses and retail.

The site was identified through the London SHLAA 2017.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are for a residential led, mixed use scheme (including some Industrial) with the retention of the Adelaide Dock and follows a proposed amendment (see p. below).

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary corresponds to that of the Endsleigh Industrial Estate, including Adelaide Dock Yark and reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 59 net units (comprising 59 gross gains and 0 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net. There are no pre-existing residential units present at the site.

The capacity for this site has been informed and calculated using a combination of sources. A small section of the site to the north has permission (190140FUL) for 9 residential units. Although works commenced in November 2022 an NMA application was approved in May 2024. At the point of finalising the current iteration of the trajectory this permission remained in the pipeline. We believe works completed in 2024/25. The capacity for the rest of the allocation, which makes up the majority of the site area, was calculated using the R19 calculator tool. This assumed that the site would accommodate a mix of uses including residential and industrial.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Identified commercial uses should provide for active frontage and serve the increased population of the area.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
9	0	0	0	0	0	16	17	17	0	0	0	0	0	0	59

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

Each component of the supply (pipeline and allocation) has been phased separately. The approved 9-unit scheme (190140FUL) to the north of the site commenced in November 2022 based on CIL records. An NMA application was subsequently approved in May 2024. At the point of writing, we believe works have now completed, and this capacity has been assigned to year 1 accordingly. The remaining capacity (50 units) does not as yet have any permissions or applications associated with it, and accordingly we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 28.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, a nearby SINC and non-designated industrial uses.

h. how the relevant design criteria are justified, and whether they appropriately

address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but there is a conservation area nearby requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the SINC, the site is likely to have limited indirect or no effect as features could likely be retained or effects mitigated.

Regarding non-designated industrial uses, future development must satisfy London Plan and Ealing Local Variation Policy E4.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm, landscaping, and greening improvements; improvements to the SINC and canal towpath; and flood risk mitigation (surface water). The IDP identified the need for increased school capacity in the wider Southall area. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: Industrial uses on this non-designated site have outlived their historical justification of servicing from the canal and are now poorly connected and constrained by surrounding residential.

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was prepared for this allocation as part of the Level 2 SFRA because the extent of the site area falling with flood zones 2 or 3 exceeded the screening thresholds of 0.49% for fluvial sources and or 7.5% for surface water sources. The screening assessment at appendix A of the Level 2 SFRA (EB97) details the extent of overlap as a percentage of the site area. The extent of the site area falling within flood zone 3a (surface) is 19.39% exceeding the threshold for surface sources and triggering a site assessment. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial). As noted in the response to Q8 Section 2.5.2 of the IIA summarises the application and cumulative findings of the sequential and exception tests. This concluded that the sequential test has been applied appropriately, and for all cases where triggered the exception test (both parts) was passed. A site assessment proforma for this allocation site is included at appendix B of the Level 2 SFRA. This addresses a number of matters including classifying vulnerability, summarising risk, identifying flood defences, assessing risk for each source, describing the flood mechanism, identifying safe entry and exit routes, identifying mitigation measures, and confirming if site will be safe over its lifetime (as per the exception test). Key findings for this allocation can be summarised as follows:

- No fluvial or tidal risk.
- The Exception Test is required for this site as 19.50% of the site area is within Flood Zone 3a (surface water) and the proposed vulnerability classification is 'More vulnerable'.
- Can pass clause B of the exception test.
- The site is at high risk of surface water flooding, particularly along Endsleigh Road that runs through the centre of the site.

Reflecting these findings additional text has been added under the contextual considerations section of the allocation text, drawing out those elements of the evidence which may impinge on the design and layout of any future proposal on this site. The measures/design solutions are deemed to be achievable within the context of the wider allocation parameters. For ease of reference the relevant text is set out here:

'The site is at high risk of surface water flooding, particularly along Endsleigh Road that runs through the centre of the site. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.'

As addressed elsewhere the allocations omit capacities. The capacities employed for the trajectory either reflect permitted or pending schemes which have already been informed by site specific FRAs or are based on design-based work or capacity calculations which has typically employed conservative assumptions. At a high level this has considered environmental constraints including flood risk, which has moderated the developable area, and will have had a bearing on capacity estimates.

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: The Transport Assessment for the approved 9-unit scheme takes into account the PTAL of the site, active travel conditions in the vicinity, and alignment with all relevant policies of the London Plan including car parking and cycle parking provision. A Travel Plan was not required for this scheme due to its small scale.

For the remainder of the development capacity, specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL, active travel schemes (existing and proposed), and will require alignment with all relevant policies of the London Plan. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If

a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM119}.

Additional amendments are also proposed as follows:

Amend the proposed use to say: "*Residential led, mixed use scheme (including some Industrial) with the retention of the Adelaide Dock.*"

Delete the second and third design principles of 13S0 and replace it as follows:

> "*Development should establish an open and legible street network as far as possible. Given constraints on access to the canal, and to the south of the site in general, routes and industrial access will generally exit to the north of the site. Parallel links will therefore be at a premium where they can be achieved. Development should avoid a piecemeal and fragmented approach, and further consolidation of individual sites and landholdings may be necessary in order to deliver an appropriate scheme*."

These suggested amendments are in direct response to the representations made by the Canal and River Trust and discussion between them and the council.

14SO Witley Works:

a. **the background and how it was identified;**

LPA Response: The site is located on the Grand Union Canal at the edge of the borough, bordering the London Borough of Hounslow. Norwood Green Conservation Area is located on the opposite side of the Canal. The site is situated close to13SO Endsleigh Industrial Estate in the west and Adelaide Dock, the sites being separated by new residential development, Whitley Wharf on Gilding Way. The towpath for the Grand Union Canal runs along the southern boundary of the site. Existing uses include an MOT testing centre and car repairs, a glazing and a steel company, a depot, residential housing and Heller House, a council owned property that is used for short-term housing.

The site was identified through the London SHLAA 2017.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are residential with light industrial suitable for co-location with residential development. Development proposals will need to set out the provision of industrial uses and start with a shared industrial baseline with 13SO. The proposed uses are those that will make the best use of land through intensification and will provide an opportunity to capitalise on the site's location on the Grand Union Canal.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary encompasses The Witley Industrial Estate, the depot and works area adjacent and the housing area to the east of the site. The site boundary reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 43 net units (comprising 55 gross gains and 12 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool, which assumed a mixed-use intensification model for this site prioritising industrial provision. Further detail about this tool is explained on page 14 of EB73.

e. **for commercial development, the estimated floorspace and whether this is**

justified;

LPA Response: N/A

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	14	14	15	0	0	0	0	0	0	43

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 28.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, a nearby SINC and non-designated industrial uses.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but there is a conservation area and locally listed buildings nearby requiring measures to enhance and mitigate any adverse impacts through sensitive

design/reduced capacity, where appropriate.

Regarding the SINC, the site is likely to have limited indirect or no effect as features could likely be retained or effects mitigated.

Regarding non-designated industrial uses, future development must satisfy London Plan and Ealing Local Variation Policy E4.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public realm, landscaping, and greening improvements; and improvements to the SINC and canal towpath. The IDP identified the need for increased school capacity in the wider Southall area. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: The site is suitable for industrial intensification and should provide 4 improvements in quality slash capacity.

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 0.19% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial). The site has been incorrectly classified as 'less vulnerable', however the potential inclusion of residential as part of the mix would mean that the use should be treated as 'more vulnerable'. Despite this error, the allocation still does not trigger a site assessment, although it would trigger the exception test.

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If

a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM120}.

It is also proposed that an additional amendment is made to provide better clarity and make corrections by deleting the second design principles and replace it as follows:

> "*Development should establish an open and legible street network as far as possible. Development should avoid a piecemeal and fragmented approach, and further consolidation of individual sites and landholdings may be necessary in order to deliver an appropriate scheme.*"

These suggested amendments are in direct response to the representations made by the Canal and River Trust and discussion between them and the council.

15SO Monorep Site:

a. the background and how it was identified;

LPA Response: The site is located on the Grand Union Canal, close proximity to the Metropolitan Open Land of Norwood Green. The PTAL for the site is 1b. The nearest train station to the site is Southall, which is approximately a 28-minute walk away. Bus services are located nearby. The closest bus stop is Mcnair Road, which serves the E5 service to Perivale Tesco with a service frequency of 10-15 minutes.

The surrounding area is mostly residential. However, green open spaces are also nearby. This includes Glade Lane Canalside Park, Osterley Sports Club and Osterley Cricket Club, Warren Farm Nature Reserve, and farmland to the south. The north of the site has views of the Grand Union Canal in short and longer views and is situated next to the statutory Grade II listed walls, gates, sluices & bridge at Lock 90, Hanwell Flight. The site is located within the St Mark's Church & Canal Conservation Area.

Although the site lies within the St Mark's Church and Canal Conservation Area, the existing development comprising a car dealership, vehicle repair and sales does not contribute positively to the conservation area. The site is also home to a place of worship which was an unconsented change of use and subject to an enforcement notice. However, planning application 241738FUL for a part-retrospective change of use from the existing car showroom and MOT garage into a place of worship (Class F1) was granted permission in April 2025.

The site was identified through the London SHLAA 2017.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are residential, community and public open space with some retention of industrial uses. The uses are considered to be the most appropriate for the site's location and best use of land, taking into consideration the existing and now consented change of use to place of worship.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary corresponds to that of the former Monorep Site boundary and reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: The residential capacity estimate for this site was reset to zero in the housing trajectory (EB73B). This reflects the recently implemented development which closes off scope to accommodate residential on this site. This position was regularized/confirmed via a part-retrospective application (241738FUL) involving a

change of use of the existing car showroom and MOT garage into a place of worship which was approved in November 2024.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led". Identified commercial use reflects the current commercial use.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: As noted above in response to 'd', in light of the recent change of use at this site, the trajectory has reset the future residential capacity for this site to zero.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage, archaeology, a nearby SINC and regeneration.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding heritage, there are no designated or non-designated heritage assets within the site, but the site is in a conservation area with a number of designated heritage assets close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding archaeology, the site is within an Archaeological Priority Area. Further consultation with either GLAAS or a conservation heritage advisor will be required over any future development proposals.

Regarding the SINC, it is separated from the site by built development and the road network ensuring adverse impacts are unlikely.

Regarding its strategic area for regeneration location, the site offers an opportunity, for example, to optimise the use of the land and provide more affordable homes.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include a community centre; and public realm, landscaping, and greening improvements. The IDP identified the

need for increased school capacity in the wider Southall area. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: The site is wholly located within flood zone 1 (fluvial and surface) and a more detailed site assessment has not been triggered as part of the Level 2 SFRA exercise (EB99).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in

the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: The measures to promote active travel take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. The Travel Plan for the change of use permission noted above supports measures to promote sustainable travel to the site and the behaviour change required for modal shift. Measures include cycle parking and EV charging. This plan is currently pending consideration by the Council.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM121}.

16SO Warren Farm and Imperial College:

a. the background and how it was identified;

LPA Response: The site comprises Ealing's largest sport ground, although it was taken out of use for community sports over 10 years ago. The site previously provided 16 adult football pitches, 6 cricket pitches, 8 netball courts, and softball provision, as well as cricket nets and athletics facilities. These facilities were supported by changing facilities spread across 5 separate buildings. The site is designated Metropolitan Open Land and Warren Farm is also designated as Community Open Space.

Given the lack of use the buildings on the site are in extremely poor condition and have been subject to notable vandalism. The land across the site is also overgrown and has become home to hundreds of plants, insects, mammals and birds. Given the size and openness of the site, coupled with the less intensive management regime in recent years, a number of rare and vulnerable species are present. Given this status the Council are currently pursuing a Local Nature Reserve status for an extensive part of the site, which will complement the existing SINC designation.

The Council's Indoor and Outdoor Sports Facility Strategy identifies Warren Farm as a strategic priority site capable of accommodating a multi-sport and multi-pitch facility, due to its location, size and capacity to meet an identified growing need.

The area that surrounds the sports ground is characterised by a range of different land uses including residential, commercial, rural, and light industrial.

The site was identified by the council.

b. the uses to be permitted and how they are justified;

LPA Response: The uses to be provided are Community Open Space, Local Nature Reserve, community sports pitches, ancillary changing rooms and sports pavilion. The uses will replace the existing and now dilapidated sports facilities and protect the remaining Metropolitan Open Land and Community Open Space by designating it as a Local Nature Reserve, which will benefit the local and wider community.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary corresponds to the area known as Warren Farm and the adjoining land owned by Imperial College. The boundary reflects an agreement between Imperial College and the council which will enable the rewilding of the whole of Warren Farm and protect it with a Local Nature Reserve, and reprovide community sports pitches, changing rooms and a new pavilion on the land owned by Imperial College.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: The allocation assumes no residential component as proposed.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: N/A

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: As noted above, the allocation assumes no provision for residential.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, archaeology, green and blue space designations and regeneration.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but there are a number of designated heritage assets close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding archaeology, the site is within an Archaeological Priority Area. Further consultation with either GLAAS or a conservation heritage advisor will be required over any future development proposals.

Regarding green and blue designations, the entire site is designated as MOL and the proposed uses (outdoor sports facility and nature reserve) are considered to be appropriate uses.

Regarding its strategic area for regeneration location, the site offers an opportunity, for example, to optimise the use of the land and provide more affordable homes.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include sports and leisure facilities; measures to improve permeability and active travel; and greening improvements. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: Whilst the vast majority of the site falls within flood zone 1, a very small portion (significantly below the 7.5% threshold) of the site along the northern edge with the rail line includes flood zone 3a (surface). Although ultimately dependent on the specifics of any scheme advanced at this site, the principal activities envisaged under this allocation are likely to be water compatible uses. At this stage it is unclear whether any built sport facilities could fall under the 'less vulnerable' class. The location of any built facility of this type could easily avoid these higher risk parts of the

site, but in any event even if these were to encroach into these parts of the site the proposal would not trigger the exception test. As noted above the allocation makes no provision for residential, and therefore there are no implications arising for residential capacities in this instance.

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No.

17SO Great Western Triangle Centre:

a. **the background and how it was identified;**

LPA Response: The site is located in the eastern part of Southall, on the Uxbridge Road and close to Ealing Hospital. It is a triangular detached part of the Great Western Industrial Park, a Strategic Industrial Location (SIL) from which it is separated by Windmill Lane.

The site is bounded by a railway line to the north, the dual carriageway of the Uxbridge Road to the south and low-rise residential terraces to the east. Brent Meadow is a little further to the east, and Brent River Park and Golf Course on the other side of the railway track, with the Brent River running through these important areas designated as Metropolitan Open Land, Community Open Space, Public Open Space and SINC. Close by is the Grade I Listed is the Wharncliffe Viaduct (railway) over Brent Meadow, built by Isambard Kingdom Brunel and the locally listed Iron Bridge is located to the west of the site, separating this isolated piece of SIL from the Great Western Industrial Park.

Current uses on the site include industrial uses, an auto repair and builders' merchant, as well as warehousing and educational uses. Any redevelopment should adopt a master planned approach similar to that set out in Policy E6 for LSIS.

The site was identified and recommended by an Ealing officer.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are industrial, with some supporting residential and retail. The majority of the current uses on the site are non-conforming. New industrial provision should not include any non-conforming uses. It is envisaged that the site would benefit from consolidation and rationalisation to provide an uplift in industrial uses, creating a high-quality environment for any residential uses and a more active frontage on the Uxbridge Road with convenience retail to support the existing housing directly adjoining the site, which will help to create a safer more attractive area for local residents.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The boundary corresponds to the area known as the Great Western Triangle Centre and reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 60 net units (comprising 64 gross gains and 4 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the

anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool, which assumed a mixed-use intensification model for this site prioritising industrial provision. Further detail about this tool is explained on page 14 of EB73.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: N/A

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	20	20	20	0	0	0	0	0	0	0	60

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that bespoke phasing was employed reflecting pre-app interest in recent years. None of the capacity would currently qualify as 'deliverable' however, and so all capacity is assigned after year 5. Reflecting the scale of opportunity capacity was split over three years.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, a nearby SINC and Green Corridor, SIL and regeneration.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but there are a number of designated heritage assets close by requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the SINC and Green Corridor, the site is likely to have limited indirect or no effect as features could likely be retained, or effects mitigated.

Regarding its strategic area for regeneration location, the site offers an opportunity, for example, to optimise the use of the land and provide more affordable homes.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include public realm, landscaping, and greening improvements; and measures to improve permeability, active travel, and the SINC. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study

used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: Current uses on this designated SIL site are predominantly non-industrial so the proposal is designed to reintroduce conforming industrial uses in an approach similar to that which is applied on LSIS. This reflects the comparatively small size of the site and its isolated position relative to other SIL and adjacent to both green space and residential uses.

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 2.77% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial). The site has been incorrectly classified as 'less vulnerable', however the potential inclusion of residential as part of the mix would mean that the use should be treated as 'more vulnerable'. Despite this error, the allocation still does not trigger a site assessment, although it would trigger the exception test.

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal

shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No.

18SO Golf Links Estate:

a. the background and how it was identified;

LPA Response: The Golf Links Estate is a large housing estate currently undergoing regeneration. The council's 2008 estates review highlighted that Golf Links needed a lot of work to address the improvements required to bring it up to the government's Decent Homes standard.

Golf Links Estate is located on the Greenford Road and adjacent to West Middlesex Golf Course to the south, with Brent Valley Municipal Golf Course to the east on the other side of Greenford Road.

Phases 0 – 3 out of 14 have been completed or started. The remaining phases are subject to outline planning permission. The estate consists of several different building types, including 6-storey maisonette blocks, low-rise blocks and 3 tower blocks. Redevelopment provides an opportunity to upgrade and improve housing for existing and future tenants, as part of the larger regeneration of Southall.

Planning permission PP/2013/4843 was granted in January 2014 for the demolition of St David's Court and erection of part three, five and six storey block containing 31 flats refuse stores, landscaping and car parking, and was an alteration to extant permission PP/2012/3052.

Planning permission 195348OUT was granted in April 2020 - outline planning permission for the demolition of all existing buildings and construction of a residential led mixed-use development comprising of up to 147 residential units (Use Class C3) of up to 8 storeys in height, including up to 500 sqm of flexible non-residential floorspace (Use Classes A1, A2, A3, B1, D1 and D2) and associated infrastructure.

Planning permission 221501REM was granted in November 2022 for the approval of Reserved Matters relating to planning permission 195348OUT.

The site was identified by the council.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are residential, including the reprovision of affordable and assisted housing alongside the provision of new residential and community uses. The uses are compatible with the council's aspirations for the site.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary corresponds to the remaining undeveloped phases of the extant planning permission and masterplan and reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 294 net units (comprising 430 gross gains and 136 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

The allocation boundary and capacity figure given here relate to phases 4-14 of the wider estate renewal project. Phases 0, 1 & 2 sit beyond the allocation boundary and are complete. Phase 3 (approved under 221501REM) also sits outside the allocation and has been underway since March 2023, and is due to complete in Autumn 2026. Phase 3 is captured separately in the trajectory as part of the pipeline. Phases 4-14 are still at pre-planning stage. An initial high-level feasibility study examined different development scenarios for theses phases of varying intensity in respect of the level of intervention, from partial development to comprehensive redevelopment. This has generated a range of figures from 294 (net) / 430 (gross) for partial development to 945 (net) / 1,463 (gross) for comprehensive development of these phases. It is anticipated that these figures will be refined further in light of emerging master planning work for this site. In the interim and taking a cautious approach, the lower range were employed for the purpose of populating the trajectory and are reflected in the figures given above.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: N/A

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to Question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	73	73	74	74	0	0	0	0	0	294

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advises that whilst recognizing the early feasibility work, and noting progress in relation to the earlier phases, detailed permission does not yet exist for phases 4-14. We have therefore reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 25. It should be noted that the phasing programme assumed here reflects the lighter touch development scenario. If a more comprehensive scenario is advanced then delivery may extend beyond the plan period, although the overall total will also need to be revised upwards.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, green space designations and regeneration.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding the SINC, the site is likely to have limited indirect or no effect as features could likely be retained, or effects mitigated.

Regarding its strategic area for regeneration location, the site offers an opportunity, for example, to optimise the use of the land and provide more affordable homes.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm, landscaping, and greening improvements; play space facilities; community facilities; and measures to improve permeability and active travel. The IDP identified the need for increased school capacity in the wider Southall area. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 5.63% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: The measures to promote active travel take into account the PTAL of

the site and active travel schemes in the vicinity (existing and proposed) and require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. A Travel Plan supports the measures, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM122}.

19SO Cranleigh Gardens Industrial Estate & Kingsbridge Crescent:

a. the background and how it was identified;

LPA Response: The site is situated within a predominantly residential area in the north eastern part of Southall, on the border with the London Borough of Hillingdon. It is located off Kingsbridge Crescent and is bordered by the Grand Union Canal (Paddington Branch) and towpath to the west. Durdans Park Primary School is located to the north and housing in Kingsbridge Crescent to the east and south east with its mix of two-storey terraced and semi-detached houses.

The current uses on the site include numerous small businesses, a boxing club, Southall Scout Activity Centre and places of worship (Nanaksar Gurdwara, Dominion Chapel Church and Celestial Church of Christ).

Planning permission P/2013/2628 was granted in May 2014 to demolish Lion House 56 – 58 Kingsbridge Crescent, a former print works and redevelop the site with a mix of 22 flats and 4 houses, communal garden space and a children's play area.

Planning application 185960FUL for Lion House, 58 Kingsbridge Crescent was granted in September 2020, a revised scheme for the change of use of the site to residential (C3) with the construction of a part four, part five, part six and part seven storey residential building comprising 30 residential units and a 3 storey terrace building comprising 13 residential units, with all units to be affordable shared equity housing. Construction of the new development is now underway.

Planning permission 223913FUL for Nanaksar Gurdwara, 60 Kingsbridge Crescent for the construction of a three-storey building comprising a community facility and place of worship (Mixed Use Class F1(f)/F2(b)), including roof top plant, solar panels, ancillary bedrooms and associated infrastructure and works (following demolition of existing building) was granted in July 2023.

The site was identified through the London SHLAA 2017.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are residential, industrial and community. The site is located in a predominantly residential area, which means residential uses are appropriate, alongside industrial and community uses. Development will need to satisfy the requirements of London Plan Policy E4 and Ealing Local Variation Policy E4 H-I for industrial retention and any co-location of residential uses should achieve an industrial uplift through intensification. Any proposals should begin with new industrial provision and then devise an enabling strategy for its provision.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary includes Cranleigh Industrial Estate, 58 Cranleigh Gardens and Nanaksar Gurdwara (60 Cranleigh Gardens). Lion House, 56 Cranleigh Gardens was removed from the boundary to take into account the development that is underway. The site boundary reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 213 net units (comprising 216 gross gains and 3 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool. Further detail about this tool is explained on page 14 of EB73.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: N/A

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	0	0	53	53	53	54	0	0	0	0	213

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

In summary for this allocation, this advises that in the absence of a permission or pending scheme, we have reverted to using the phasing assumptions detailed in table 4 of EB73. Reflecting the planning status and scale of this allocation, capacity has been assigned to future years based on scenario 29.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, nearby SINC and non-designated industrial uses.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding the SINC, the site is likely to have limited indirect or no effect as features could likely be retained, or effects mitigated.

Regarding its strategic area for regeneration location, the site offers an opportunity, for example, to optimise the use of the land and provide more affordable homes.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include public realm and canal towpath improvements, landscaping, and flood risk mitigation (surface water). The IDP identified the need for increased school capacity in the wider Southall area. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and

which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: Loss of the current non-designated industrial uses is justified by the erosion of the present industrial estate and its original justification for being adjacent to the canal. The site is constrained by surrounding uses including residential and green space and is not considered suitable for industrial intensification.

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was prepared for this allocation as part of the Level 2 SFRA because the extent of the site area falling with flood zones 2 or 3 exceeded the screening thresholds of 0.49% for fluvial sources and or 7.5% for surface water sources. The screening assessment at appendix A of the Level 2 SFRA (EB97) details the extent of overlap as a percentage of the site area. The extent of the site area falling within flood zone 3a (surface) is 19.8% exceeding the threshold for surface sources and triggering a site assessment. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial). As noted in the response to Q8 Section 2.5.2 of the IIA summarises the application and cumulative findings of the sequential and exception tests. This concluded that the sequential test has been applied appropriately, and for all cases where triggered the exception test (both parts) was passed. A site assessment proforma for this allocation site is included at appendix B of the Level 2 SFRA. This addresses a number of matters including classifying vulnerability, summarising risk, identifying flood defences, assessing risk for each source, describing the flood mechanism, identifying safe entry and exit routes, identifying mitigation measures, and confirming if site will be safe over its lifetime (as per the exception test). Key findings for this allocation can be summarised as follows:

- No fluvial or tidal risk.
- The Exception Test is required for this site as 19.18% of the site area is within Flood Zone 3a (surface water) and the proposed vulnerability classification is 'More vulnerable'.
- Can pass clause B of the exception test.
- The site is at high risk of surface water flooding, particularly in northern section of the site and along the eastern boundary.

Reflecting these findings additional text has been added under the contextual considerations section of the allocation text, drawing out those elements of the evidence which may impinge on the design and layout of any future proposal on this site. The measures/design solutions are deemed to be achievable within the context of the wider allocation parameters. For ease of reference the relevant text is set out here:

> *'The site is at high risk of surface water flooding, particularly in northern section of the site and along the eastern boundary. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.'*

As addressed elsewhere the allocations omit capacities. The capacities employed for the trajectory either reflect permitted or pending schemes which have already been informed by site specific FRAs or are based on design-based work or capacity calculations which has typically employed conservative assumptions. At a high level this has considered environmental constraints including flood risk, which has moderated the developable area, and will have had a bearing on capacity estimates.

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: The measures to promote active travel take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. A Travel Plan supports the measures, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range

of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM123}.

20SO Hambrough Tavern:

a. **the background and how it was identified;**

LPA Response: Hambrough Tavern is a small site that occupies a prominent position at the junction of The Broadway and Bankside in Southall. The public house is no longer in operation. The site acts as a gateway to the Borough, being located at the entrance to the Borough from the London Borough of Hillingdon. The area has a mix of uses, predominantly residential. To the north of the site is the Southall Army Reserve Centre. Directly to the east of the site is an adjoining industrial unit, that trades in scrap metal, which is further flanked by conventional two-storey terrace housing. To the south of the site is established terrace housing and to the west is the Grand Union Canal and towpath, which also forms part of the Canalside Conservation Area. Whilst the site is not located within the Southall Town Centre, it is within reasonable walking distance and there are a number of buses routes along The Broadway.

In August 2021, permission was granted for a hotel (see details below). However, the site owners were not able to secure interest from potential operators and delivery of the extant planning permission was no longer considered viable. The site was then acquired by the current owners who submitted a scheme for build to rent units, which was granted permission in August 2024 (see details below).

Planning permission 184519FUL was granted in August 2021 for redevelopment of the site to construct a part single storey, part three storey, part four storey, part fifteen storey, 161-bedroom hotel (Use Class C1) with basement level and two ancillary public houses and conferencing suite; following demolition of existing public house (Use Class A4) and estate agents (Use Class A2).

Planning permission 223545FUL was granted in August 2024 for demolition of the existing buildings and redevelopment of the site for a part 5, part 17 storey building plus basement, comprising 116 build to rent residential units (Use Class C3), public house (sui generis) and community space (Use Class F2(b).

The site was identified through pre-application meetings.

b. **the uses to be permitted and how they are justified;**

LPA Response: The proposed uses are for residential, with retail/commercial on the ground floor and reprovision of the public house use. The uses are considered appropriate to the area, which is mainly residential, with the reprovision of the public house to ensure a valuable community asset is retained and retail/commercial on the ground floor to provide an active frontage and uses that will serve the surrounding residential community.

c. **how the boundaries and extent of the site have been defined and justified;**

LPA Response: The site boundary corresponds to the area covered by the Hambrough

Tavern and reflects the council's current understanding of the extent of the development opportunity.

d. **for housing allocations, the anticipated capacity of the site and whether this is justified;**

LPA Response: 115 net units (comprising 116 gross gains and 1 gross losses). As the site is categorised as a 'small site' with a site area smaller than 0.25ha, the capacity figure given here does not feature as an individual site input in the trajectory and is substituted with a single modelled/forecast small sites windfall input. Notwithstanding this position, an individual site capacity figure has been populated here to provide an indicative figure for this exercise only. This total (115 units) reflects the recent approval (223545FUL) given in August 2024 for this site.

e. **for commercial development, the estimated floorspace and whether this is justified;**

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led", with any mixed uses justified by the gateway nature of the site both to Southall and the canal.

f. **evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;**

LPA Response: As this allocation is categorised as a small site and individual site capacity estimates have been substituted by a single combined input covering the contribution from all small sites, phasing has not been determined at an individual site level.

g. **whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;**

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with heritage and nearby SINC.

h. **how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;**

LPA Response: Regarding heritage, there are no designated or non-designated heritage assets within the site, but the site is adjacent to a conservation area requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding the SINC, the site is likely to have limited indirect or no effect as features could likely be retained, or effects mitigated.

i. **the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;**

LPA Response: The site's infrastructure requirements include a pedestrian crossing on Bankside opposite the site, improvements to canal access, public realm and landscaping improvements, and flood risk mitigation (surface water). The IDP identified the need for increased school capacity in the wider Southall area. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed.

j. **how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;**

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. **whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;**

LPA Response: N/A

l. **whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;**

LPA Response: A site assessment was prepared for this allocation as part of the Level 2 SFRA because the extent of the site area falling with flood zones 2 or 3 exceeded the screening thresholds of 0.49% for fluvial sources and or 7.5% for surface water sources. The screening assessment at appendix A of the Level 2 SFRA (EB97) details

the extent of overlap as a percentage of the site area. The extent of the site area falling within flood zone 3a (surface) is 26.22% exceeding the threshold for surface sources and triggering a site assessment. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial). As noted in the response to Q8 Section 2.5.2 of the IIA summarises the application and cumulative findings of the sequential and exception tests. This concluded that the sequential test has been applied appropriately, and for all cases where triggered the exception test (both parts) was passed. A site assessment proforma for this allocation site is included at appendix B of the Level 2 SFRA. This addresses a number of matters including classifying vulnerability, summarising risk, identifying flood defences, assessing risk for each source, describing the flood mechanism, identifying safe entry and exit routes, identifying mitigation measures, and confirming if site will be safe over its lifetime (as per the exception test). Key findings for this allocation can be summarised as follows:

- No fluvial or tidal risk.
- The Exception Test is required for this site as 26.22% of the site area is within Flood Zone 3a (surface water) and the proposed vulnerability classification is 'More vulnerable'.
- Can pass clause B of the exception test.
- The site is at high risk of surface water flooding, particularly the southern section of the site.

Reflecting these findings additional text has been added under the contextual considerations section of the allocation text, drawing out those elements of the evidence which may impinge on the design and layout of any future proposal on this site. The measures/design solutions are deemed to be achievable within the context of the wider allocation parameters. For ease of reference the relevant text is set out here:

> *'The site is at high risk of surface water flooding, particularly the southern section of the site. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.'*

As addressed elsewhere the allocations omit capacities. The capacity employed in this instance reflects the now approved scheme (223545FUL), which itself has been the subject of a site-specific flood risk assessment.

m. **where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;**

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be

demonstrated on balance at the point of decision.

n. **how measures designed to promote sustainable travel will be effective;**

LPA Response: The measures to promote active travel take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. A Travel Plan supports the measures, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. **clear evidence of whether the site is viable and developable at the scale of development expected; and**

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. **any modifications that are necessary for reasons of soundness.**

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM124}.

21SO Toplocks Estate:

a. the background and how it was identified;

LPA Response: Toplocks Estate is owned and managed by A2 Dominion, a Registered Social Landlord. The site is located below Whittle Road Park and an area of SINC and is bounded to the south by the Grand Union Canal, the west by a branch of the Canal and to the east by Glade Lane Canalside Park and residential two storey housing. The site is adjacent to St Mark's Church and Canal Conservation Area, the nearby Grade II Listed walls, gates, sluices and bridge at Lock 90, Hanwell Flight and Locally Listed Norwood Top Lock Sanitary Station and Lock Keepers Cottage. Southall Station and Southall Town Centre are a 20-25-minute walk, and the Estate is located close to Havelock Estate which is currently undergoing regeneration.

Current uses include residential, a supermarket (currently closed), a community centre (including medical centre and Havelock Children's Centre), associated car parking and incidental open space. The existing residential development is predominantly 2 storey terraced houses with gardens and 4 storey blocks of flats.

The site was identified through the Regulation 18 Call for Sites.

b. the uses to be permitted and how they are justified;

LPA Response: The proposed uses are for residential with retail/commercial and community and substation. The existing community centre, children's centre, medical centre, pharmacy and substation should be retained or reprovided on site, especially due to the site's relative isolation from easily accessible community facilities and retail uses. There is an opportunity to increase the number of residential units on the site which will help to provide much needed homes for the borough.

c. how the boundaries and extent of the site have been defined and justified;

LPA Response: The boundary corresponds to A2 Dominion's landownership and reflects the council's current understanding of the extent of the development opportunity.

d. for housing allocations, the anticipated capacity of the site and whether this is justified;

LPA Response: 415 net units (comprising 614 gross gains and 199 gross losses). Please note that this figure derives from the Housing Trajectory (EB73B) and represents the anticipated contribution of this 'Large' site allocation geography to our future supply. The principal capacity figure given here and feeding our future supply is net, accounting for the loss of existing units.

The anticipated capacity for this site has been calculated using the R19 capacity calculator tool, which assumed a mix development. Further detail about this tool is

explained on page 14 of EB73.

e. for commercial development, the estimated floorspace and whether this is justified;

LPA Response: The commercial floor space is not specified by the allocation and the scheme is specified as "residential-led" with any commercial provision to complement the predominant residential character of the scheme.

f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;

LPA Response: The approach to phasing has been determined on a site-by-site basis having regard to a range of factors including planning status (including scheme/application progress where relevant), the scale of the development opportunity, land ownership, assembly and viability considerations. In considering these factors the approach taken has been to use the best available information, typically prioritising first any scheme specific information, before reverting to using more generalised phasing assumptions. Further detail regarding the approach and rationale is provided in EB73 and in our response to question 13 of Matter 4.

The anticipated programme of delivery for this site, as extracted from EB73A, is set out in the table below:

YR 01 24-25	YR 02 25-26	YR 03 26-27	YR 04 27-28	YR 05 28-29	YR 06 29-30	YR 07 30-31	YR 08 31-32	YR 09 32-33	YR 10 33-34	YR 11 34-35	YR 12 35-36	YR 13 36-37	YR 14 37-38	YR 15 38-39	Scheme Total
0	0	0	0	0	83	83	83	83	83	0	0	0	0	0	415

The approach taken to phasing for each allocation input is described in column Z of the allocation tab of EB73A or column BL of EB73ii. For ease of reference this is summarised here:

This advised that bespoke phasing was employed, informed by landowner input. The Call for Sites submission suggested that delivery could occur between years 6 to 10. The distribution of phasing over 5 years also reflected the gross total.

g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;

LPA Response: Yes, see Planning Designations/Site Constraints which primarily deal with flood risk, heritage, green and blue space designations and regeneration.

h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;

LPA Response: Regarding flood risk, see response to Q l below.

Regarding heritage, there are no designated or non-designated heritage assets within the site, but the site is adjacent to a conservation area and is nearby designated heritage assets requiring measures to enhance and mitigate any adverse impacts through sensitive design/reduced capacity, where appropriate.

Regarding its strategic area for regeneration location, the site offers an opportunity, for example, to optimise the use of the land and provide more affordable homes and new social infrastructure.

i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;

LPA Response: The site's infrastructure requirements include the reprovision of health and children's facilities, community centre, substation, and measures to improve active travel and green links. The IDP identified the need for increased school capacity in the wider Southall area. The precise infrastructure impacts/needs of the proposed development (including education and health) and the timescales for the delivery of any required infrastructure will be assessed once the development proposals have been further developed. Planning obligations, including s106 and the newly introduced Ealing Community Infrastructure Levy, will ensure that developers contribute towards the provision of the necessary infrastructure.

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

LPA Response: All site-specific recommendations on heights are subject to a common evidence base which begins with the suitability and sensitivity analysis, and analysis of prevailing heights, that informed the tall buildings thresholds across the borough. This analysis also gave rise to general recommendations about the range of building heights more likely to be appropriate for tall buildings in each area. From this information, and dependent upon the nature of each identified development site, detailed assessment was made of specific heights that should be allocated to each development site. Most sites were subject to a massing study which assessed visibility and impact upon the townscape and upon identified heritage assets, and which was subject to an iterative design process to identify known local planning constraints.

Living conditions per se were not included in this analysis, however, the massing study used standard layouts, orientation and light requirements, and accounting for unit mix, second staircase requirements.

k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;

LPA Response: N/A

l. whether the site has been taken forward for targeted assessment in the Level 2 -Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;

LPA Response: A site assessment was not triggered as part of the Level 2 SFRA exercise because the extent of the allocation site falling either within medium (flood zone 2) or high-risk areas (flood zones 3) was less than 0.49% of the site area for fluvial sources and less than 7.5% for surface water sources. The extent of the site area falling within flood zone 3a (surface) is 2.75% only. No part of the site falls within flood zone 2 (fluvial), flood zone 3a (fluvial) or flood zone 3b (fluvial).

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

LPA Response: Identified heritage assets, including conservation areas, are set out in the Planning Designations/Site Constraints section of the allocation. The allocation itself forms part of the broader matrix of policies and evidence that will be used to determine applications upon the site, and the principle of development will have to be demonstrated on balance at the point of decision.

n. how measures designed to promote sustainable travel will be effective;

LPA Response: Specific measures to promote active travel will be determined during the planning process. They will take into account the PTAL of the site and active travel schemes in the vicinity (existing and proposed) and will require alignment with all relevant policies of the London Plan including car parking and cycle parking provision. Additionally, a Travel Plan will be developed where appropriate, to promote sustainable travel to the site and support the behaviour change required for modal shift.

o. clear evidence of whether the site is viable and developable at the scale of development expected; and

LPA Response: Ealing's local plan has no identified strategic sites. Relevant typologies for development are tested as part of the whole plan viability study reflecting the types of developments expected to come forward in the borough over the life of the emerging Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels and tenure mixes of affordable housing and other emerging policy requirements, and with varying CIL rates) to a range of benchmark land values to reflect the existing value of land prior to redevelopment. If a development incorporating the Council's emerging policy requirements and potential CIL rates generates a higher residual land value than the benchmark land value, then it can be judged that the scheme is viable and deliverable.

p. any modifications that are necessary for reasons of soundness.

LPA Response: No. It is suggested that amendments to ensure better clarity are made as proposed in the Schedule of Suggested Modifications {S24 - reference SMM125}.

However, to ensure better clarity, a further suggested amendment is proposed under contextual considerations as follows:

> "*Development proposals should consider nearby features of ecological value (SINC) and ensure the need for sensitive treatment along the edge of the site*."

{END}