

# **Matter 10: Delivery and Monitoring**

## **Issue:**

**Whether the Plan is effective in terms of delivery of its proposals and arrangements for monitoring**

**Written Statement on Behalf of Ealing Council**

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***(Note - Answers to questions in this Matter, particularly around infrastructure provision, will also be informed by detailed discussions about deliverability of specific allocations and the Spatial Strategy under other Matters).***

## **Questions**

- 1. Does the Plan set out the contributions expected from development and is it in accordance with paragraph 34 of the NPPF?**

**LPA Response:** Yes, the plan sets out expected levels of contributions, including for affordable housing provision, except where these are covered by the CIL. Affordable housing tenure will continue to be determined by the most up-to-date LHNA and set out in guidance.

- 2. What is the latest position on the examination of the draft Ealing LPA Charging Schedule [EB41] and does it have any implications for the soundness of the Plan?**

**LPA Response:** The CIL draft charging schedule is due to be examined on 5 August 2025. Exchange of legal opinions as part of this process have clarified that the local plan and CIL remain a separate process is, so the implications for either are limited.

- 3. Does Policy FLP provide a sound approach to funding? Is the approach of leaving detail to a future SPD sound?**

**LPA Response:** Yes, the bulk of the funding to be secured through the planning process will be delivered by the CIL. The local plan has only an ancillary function in providing funding, and detail on S 106 is most suitable in supplementary guidance.

- 4. In terms of Policy ENA:**

- a. What is the background the policy and what does it seek to achieve?**

**LPA Response:** The policy is designed to ensure that clear guidance exists for enabling development where this is not currently the case. This is particularly necessary on green space call mom where clear provision exists in policy G4 that development for green space uses should constitute the minimum necessary, but corollary guidance on enabling development is otherwise absent.

- b. How is it justified by the evidence, including the scoring against the objectives in the IIA process?**

**LPA Response:** The policy is carefully written to ensure that only development serving the purpose of a given designation is eligible, and that this must be on the smallest extent possible to enable the required improvements. As such the IIA showed no significant effect, either positive or negative.

- c. For effectiveness, is it clear about when the policy would apply? Does it provide certainty about how a decision maker should react to a proposal?**

**LPA Response:** The policy is written effectively for all circumstances in which there is not current guidance on enabling development. The possible exception is heritage, where there is already sufficient and detailed guidance as to the approach to enabling development and this policy is unnecessary. The council is in discussions with Historic England about how this can be

addressed and will include recommendations in the Statement of Common Ground between Historic England the Council {S22 j}.

**5. How has viability been considered? Is there a proportionate assessment of the viability of the Plan? Is it sufficiently flexible to respond to relevant changes which may occur during the plan period?**

**LPA Response:** In accordance with national guidance the plan, and its policies have been tested by means of standard residual valuation approaches applied to a series of different development typologies, with particular reference to the impact on viability of the Council's emerging planning policies alongside potential rates of CIL. However, due to the extent and range of financial variables involved in residual valuations, they can only ever serve as a guide. Individual site characteristics (which are unique) mean that the conclusions may need to be moderated by the development management process.

Policy costs have therefore been accounted for, including the provision of affordable housing and it is important to note that CIL rates have been further reduced from the costs which were tested in the viability assessment meaning that there is now significant headroom and flexibility.

**6. In terms of how the Plan will be monitored:**

- a. does the monitoring framework appropriately dovetail with and/ or rely upon relevant monitoring arrangements for other parts of the development plan for the Borough;**

**LPA Response:** The monitoring framework describes the core indicators intended to aid our understanding of the effectiveness of policies in delivering the plan's vision and spatial strategy.

Several of the indicators included here are already monitored and are reported separately through other outputs, including against national reporting. Notable outputs include returns in respect of Housing Flow Reconciliation, Housing Delivery Test and the Infrastructure Funding Statement. Where indicators feed into separate reporting, the Council has endeavoured to employ consistent definitions and calculation methods. The GLA also reports against a number of these indicators as part of their own AMRs, which are also supplemented by additional measures as well which provide useful contextual information around the performance of the London Plan more generally, which is significant given the status of the London Plan forming part of our development plan and the close interaction between our policies (specifically the DM policies) and those set through the London Plan.

As detailed in the explanatory text to the monitoring framework, and notwithstanding the separate reporting noted above, the intention is to report against the core performance measures/indicators through the Council's own Authority Monitoring Report. All of the core indicators identified are quantifiable and draw from a range of data sources.

The central data source for a number of these indicators is the GLA's Planning London Datahub (PLD), which Ealing contributes to. The PLD holds detailed information on planning applications, permissions, commencements and completions in London. This data source allows us to monitor planning permissions and track their progress to completion. This provides a key tool to understand whether the policies in Ealing's Local Plan are effective.

In addition to drawing from development data statistics, a number of other data sources are also typically employed including other GLA datasets, Government published performance

data, Environment Agency data, Ealing's Automated Energy Monitoring Platform, Ealing's Self and Custom Build Register, Planning Inspectorate appeal reports, departure statistics etc. Whilst monitoring activities tend to focus on quantitative measures, our reporting is also supplemented by qualitative analysis and also considers wider contextual factors which may also be influenced by factors operating beyond the plan but nonetheless have a bearing on the application and interpretation of policy performance.

**b. do the proposed indicators provide adequate coverage across each of the policies of the Plan?**

**LPA Response:** Yes, we believe the coverage is sufficiently broad to support our understanding of the effectiveness of the plan overall, but as detailed in the explanatory note it has not been possible to identify measurable indicators for all policies in the plan. As noted above all of the core indicators are quantifiable and draw from established data sources. Where gaps exist, the Council is committed to identify and develop new data sources, where feasible. Going forward there may be scope to capture additional details as part of the PLD, but as a pan London system which is fed by the national Planning Portal, we may be only able to capture this information locally and it is unlikely we would be able to do this retrospectively for past years. As noted already, any quantitative analysis may also need to be supplemented by qualitative commentary.

Again, as noted above, it is not intended that the indicators defined here reflect the full extent of the monitoring activity planned and reported via the AMRs both here in Ealing and by the GLA.

**c. is each indicator relevant and measurable?**

**LPA Response:** Yes, the targets have been carefully selected/defined to represent the best measure of the direct outcome of the Local Plan policies. As noted above, many are already monitored and reported. In each case the means of calculation and datasets are known already. The methodology for calculating each measure, including any assumptions, limitations and data sources used, will be described within the AMR.

**d. are any modifications needed to the monitoring framework for soundness?**

**LPA Response:** As expressed currently all of the indicators and targets are LPA based. It is recognised that it may be appropriate and helpful to also report against a number of these indicators at a town-based level as well. From an initial review of each of the datasets underpinning each measure, it is noted that all of the data inputs have spatial attributes attached to them. It is therefore feasible that reporting could be broken down to town level as well.

The framework set out at Table 1, specifies for each indicator which policy or policies are being monitored. This could be expanded to also reference which plan objectives are being measured.

**{END}**