

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

Ealing Council
Perceval House
14-16 Uxbridge Road
London W5 2HL

Tel 020 8825 8056

Your ref	My ref	Extension	Date
	CR/021	8056	21st October 2025

Dear Sir/Madam,

**Examination of the Ealing Local Plan 2024-2039:
Ealing LPA's Response to Post Hearing Action Logs, Part 4 -
dealing with items 1.1, 1.3, 3.1, 3.2, 4.3 and 4.10.**

I wrote to you setting out a record of the agreed log of actions on 3rd July 2025 {EX19} that arose from the hearing sessions that dealt with Matters 1 to 5 in Block 1 between June 16th and June 19th 2025. I also note the further clarification by you in subsequent correspondence on 12th September 2025 (EX24) that related to Matter 9.

This letter provides the third batch of council responses relating to Action Log items 1.1, 1.3, 3.1, 3.2, 4.3 and 4.10.

Matter 1: Procedural and legal requirements -

Action 1.1: Clarify to what extent the Statement of Common Ground with OPDC is reflected in the suggested Modifications schedule.

A revised Schedule of Suggested Modifications is nearing completion and this highlights two transcription errors arising from the SoCG between the OPDC and Ealing. These relate relating to SMM6 and SMM8 in the earlier iteration of the schedule published in November 2024{S24}as follows:

Ref. no.	Policy / paragraph	Suggested change
SMM6	Chapter 2 - Setting the scene Figure 2.2	Amend the OPDC boundary clearly and differently from other Opportunity Areas as a local planning authority. Label on key.

Ref. no.	Policy / paragraph	Suggested change
		Amend the SIL boundary to align with the boundary in OPDC's Local Plan Policies Map. Depict the emerging Old Oak major town centre. Kensal Canalside Opportunity Area should be labelled in RBKC. Harlesden district town centre should be shown.
SMM9	Chapter 2 - Setting the scene Figure 2.3	The SIL boundary is incorrect and should align with the boundary in OPDC's Local Plan Policies Map. Depict the proposed Old Oak major town centre.

These omissions all relate to cartography and have now been included in the revised schedule. In all other respects, the schedule captures all the modifications suggested and agreed in the SoCG.

Action 1.3: Provide a summary note to explain the differences between the table at paragraph 3.35 in the 2022 and 2024 versions of the submitted Equalities Impact Assessments.

Having checked and reviewed with Arup who were commissioned to write the report, the overall conclusions of the EqIA did not change between the 2022 and 2024 versions of the report. They were considered to be minor and pretty high level. If it of assistance, a version of the report that highlights updates to the EqIA in the rest of the report can be provided, if required.

Matter 3: Vision, objectives and spatial strategy -

Action 3.1: Spread sheets relating to s106 monitoring to be published

LPA Response: Copies of the LPA's Infrastructure Funding Statements (IFS) for 2021-22, 2022-23, 2023-24 and 2024-25 are attached separately.

Action 3.2: To consider strengthening the linkages between the Strategic Objectives and the monitoring framework in preparation for monitoring session.

LPA Response: Please see attached response below at Appendix 1. The table includes an additional column that notes which parts of the policy are referenced by each indicator or performance measure.

Matter 4: Housing -

Action 4.3: Note on whether housing allocations policy specifically precludes students or key workers.

LPA Response: Neither students nor key workers are explicitly excluded by the current housing allocations policy (linked below). Neither group is mentioned by name, but key workers would be covered by the "working households" band, and therefore eligible provided that they met the other requirements, including maximum income. See:

https://www.ealing.gov.uk/download/downloads/id/19170/housing_allocations_policy.pdf

Action 4.10: Evidence of feasibility of social rent provision in large scale purpose-built shared living schemes.

LSPBSL schemes with social rent provision have been implemented in various parts of London, including for example:

- [23/AP/0387](#) 79-161 Ilderton Road, LB Southwark: 605 Co-Living and 120 C3 affordable units (35% by NIA floorspace)- S106 signed September 2024
- [2020/00300/FUL](#) 227 Wood Lane, LB Hammersmith & Fulham: 209 Co-Living and 60 C3 affordable units (34% by NIA floorspace)- S106 signed November 2023.
- [22/AP/1603](#) 18-22 Penarth Street, LB Southwark: 283 Co-Living and 47 C3 affordable units- Resolution to grant June 2023 pending S106 agreement.

Yours sincerely

Steve Barton

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APPENDIX 1:

Ealing Local Plan 2024 – Table 1: Monitoring Framework

Indicator / Performance Measure	Target(s) (if applicable)	Key Policies Monitored	Notes
Housing delivery – number of net additional homes completed.	- Deliver 21,570 net additional homes between 1st April 2019 and 31st March 2029. - Deliver 40,983 net additional homes between 1st April 2019 and 31st March 2038. - Meeting the annual Housing Delivery Test.	Policy SP.4 Policy SSC Policy HOU	Policy SP4.3 A
Housing supply – confirmation of Ealing's Five-Year Housing Land Supply position.	Maintain a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing.	Policy SP.4	Policy SP4.1 C
Housing delivery – specialist older person housing.	Number of units granted and completed against London Plan benchmark.	Policy HOU Policy SP.4	Policy SP3.3 K
Housing delivery – purpose-built student accommodation.	Number of units granted and completed against London Plan benchmark.	Policy HOU Policy SP.4	
Housing delivery – net number of additional Gypsy and Traveller Pitches provided.	Number of units granted and completed against delivery plan.	Policy SP.3	Policy SP3.1 D
Housing supply – number of serviced plots for self-build and custom housebuilding securing suitable permission.	Sufficient permissions secured to meet demand on the self and custom build register.	Policy H16 Policy SP.4	
Completion of units against identified affordable need.	Measure against three year rolling average.	Policy HOU Policy SP.4	Policy SP4.3 C, D
Affordable housing contributions/provision secured through minor developments.	Proportion of sites with 1–4 units achieving contributions equivalent to 10% of site yield, and sites with 5–9 units equivalent to 20%.	Policy SSC Policy SP.4	Policy SP4.3 C, D
Proportion of new build homes meeting accessible housing standards.	90% of new build dwellings meeting M4(2) 10% of new build dwellings meeting M4(3)	Policy DAA Policy SP.4	Policy SP4.3
Net additional industrial floorspace provided in Strategic Industrial Land (SIL) and Locally Significant Industrial Site (LSIS).	Track change per site and overall across the LPA.	Policy E4 Policy E6 Policy SP.4	Policy SP4.2

Indicator / Performance Measure	Target(s) (if applicable)	Key Policies Monitored	Notes
Provision of affordable workspace.	Measure as a proportion of all new workspaces provided.	Policy E3 Policy SP.4	Policy SP4.2 G
Change in employment floorspace completed.	Change in employment space on non-designated sites.	Policy E3 Policy SP.4	Policy SP4.2 E
Tall buildings allowed inconsistent with policy.	Number of speculative applications approved on unidentified sites.	Policy D9 Policy SP.4	Policy SP4.1 B, D, E, F
Infrastructure Delivery Schedule.	An evidence-based schedule summarising planned infrastructure, phasing, delivery mechanisms, costs and priority.	Policy SP.4 Policy FLP	Policy SP4.1
Operational energy – average aggregated performance (space heating demand & energy use intensity).	As per minimum targets specified in Policy OEP by building type.	Policy OEP Policy SP.2	Policy SP2.2 A, D
Embodied carbon – average aggregated performance of major developments (KgCO2/m2).	As per minimum targets specified in Policy ECP by building type.	Policy ECP Policy SP.2	Policy SP2.2 C, D
Air quality – proportion of schemes which are Air Quality Neutral or Positive.	All developments to be Air Quality Neutral measured against benchmarks.	Policy SP.2 Policy SP.3	Policy SP2.3 H Policy SP3.3 B
Urban greening – average/aggregated Urban Greening Factor score.	Major developments: 0.4 (residential), 0.3 (commercial).	Policy G5 Policy SP.3	Policy SP3.3 C, E, F, H
Access to green space – extent of park deficiency by severity.	Number of additional hectares of green space delivered or enhanced.	Policy G4 Policy SP.3	Policy SP3.3 C, E, F, H
Biodiversity – average/aggregated level of biodiversity net gain achieved.	Minimum 20% gain calculated using the Biodiversity Metric.	Policy G6 Policy SP.2	Policy SP2.2