

Canal and River Trust/Ealing Statement of Common Ground

This statement of Common Ground addresses the matters raised by the Canal and River Trust in its representation to Ealing's Regulation 19 Local Plan.

Note: new text is shown by underlining. Deleted text is shown by ~~striketrough~~.

Reference	Summary of Issues	Ealing Response	CRT Response
Maps	The draft Local Plan (LP) acknowledges and recognises the importance of the canal network and the role it can play in supporting sustainable communities. However, it is disappointing to note that opportunities to strengthen references to the canal network throughout the LP and include a canal specific policy have not been included. There is still a lack of introduction/background on the canal network within this section to set the scene and highlight the canals potential in meeting the aims and vision of the LP. Furthermore, considering that some sections of the canal network are coincident with the administrative, Town Plan area boundaries and conservation area designations, the canal corridor still remains somewhat lost on the maps and figures within the Plan.	There are already frequent references to the canal network throughout the plan, and primarily in chapter 4 comprising the town plans. These policies recognise the canal network as a key asset, recognising their multifunctional role and benefits. These policies identify specific town-based opportunities / priorities to be secured / facilitated via future development. Example town-based policies include G1, H1, N1, P1 & S1. Further detail is also included in specific allocations. These include the identification of opportunities / priorities to improve crossings, walking and cycling enhancements, wayfinding improvements, recreational and leisure opportunities, upgraded towpaths, and the identification of heritage sensitivities. The canal and river network are included both on the existing context	Agreed. The Trust acknowledge the issues with paper-based maps. On the basis that the Interactive Policies map is clear and any spatial plan in the Local plan defers to the interactive map the Trust consider this would be sufficient to address our comments in relation to mapping.

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	The importance of the canal to the LP area would be more apparent and unambiguous if it were more clearly shown on maps throughout the LP. The inclusion of a canal specific policy would also give more prominence and legibility to the canal network within the borough and ensure that there is no ambiguity within the plan policies, making it clear and evident to decision makers how they should react to any future development proposals which may impact on the canal corridor.	and spatial strategy maps for each town. Each respective spatial strategy map also identifies proposed active travel routes and green links / connections many of which link to or originate from the canal network. Nonetheless, the council will seek to ensure the Adopted Policies Map seeks to ensure that canals and related infrastructure are shown clearly particularly where there are overlapping designations. We also propose to make the following suggested modification and to update Para 2.18 as follows: “The borough includes large areas of strategic green open space, including sites currently designated as Green Belt and Metropolitan Open Land (MOL). These sites are mostly concentrated in the central and western parts of the borough, with more limited provision in the east of the borough, which has a more urban character and fewer green open spaces. <u>The Grand Union canal and the Paddington Arm also pass through the borough providing multi-functional green space.</u>”	

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Canal-specific policy / Policy G4 / Policy SP2.	Part D has been amended and now seeks to ensure that blue spaces are able to fulfil their full potential to be multi-functional in use and in positively contributing to achieving multiple benefits. This is reflective of London Plan Policy SI 14 which sets out the strategic role of the waterways and states that development plans should address the strategic importance of the waterways and seek to maximise their multifunctional social, economic, and environmental benefits. The multi-functional opportunities and planning considerations that relate to canals are sufficiently different to other forms of green infrastructure that a specific policy on canals in local plans is justified. For example, whilst an area of public open space may predominantly be managed for recreation, a canal corridor provides, amongst other things, recreation opportunities, an active travel corridor, a space where people can live or undertake business on moorings, a waterborne freight route and a nature corridor. It is also the case that their physical fabric and structural integrity is more susceptible to the impacts of development adjacent.	The need for strong focus on waterways is accepted but given the extensive coverage already included in the London Plan (namely SI 14, SI 15, SI 16, SI 17 and others), we don't believe that there is a need for a standalone DM type policy. Local variation policy G4 is also a DM policy, and again we don't feel that this is necessarily the right place. This would be better addressed via the spatial strategy and town plans. There are already frequent references to the canal network throughout the plan, and primarily in chapter 4 comprising the town plans. These policies recognise the canal network as a key asset, recognising their multifunctional role and benefits. These policies identify specific town-based opportunities / priorities to be secured / facilitated via future development. Example town-based policies include G1, H1, N1, P1 & S1. Further detail is also included in specific allocations. These include the identification of opportunities / priorities to improve crossings, walking and cycling enhancements, wayfinding improvements, recreational and leisure opportunities, upgraded towpaths, and	This is an area of outstanding difference between Ealing and the Canal and River Trust The Trust consider that, whilst the amendments agreed between the Council and Sport England would go some way towards addressing our concerns, they would not support, and through the requirement to preserve visual openness they may hinder, development necessary to support certain uses of a multi-functional waterway network. A number of these uses are highlighted to in the Trust's original representations, including active travel infrastructure (bridges, ramps) and moorings. We suggest that the policy is amended: (ii) Preserve and enhance the visual openness of green and open spaces particularly with regard to views to, from, within, across these areas, <u>where this would not conflict with point (iii).</u> (iii) <u>seek to maintain, enhance and maximise the multi-functional benefits of waterways.</u>

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	The Trust considers that a specific policy on canals should be included in the local plan. However, in the absence of this, Policy G4 should supplement policy SP2 by providing greater detail on how blue spaces will be supported to fulfil their potential as multi-functional spaces. London Plan Policy SI 14 states that development plans should seek to maximise the multi-functional social, economic, and environmental benefits of waterways. However, policy G4 currently focuses predominantly on the protection of environmental benefits. Whilst the Trust welcomes the consideration of these within policy G4, there is little recognition of the social and economic benefits of the canals within the borough that would be covered by this policy. There is no consideration within policy G4, or elsewhere in the plan, of the delivery of new moorings, which we believe there should be. The Trust's London Mooring Strategy explains the significant growth in the number of boats on London's waterways since 2010 and sets out findings from the Trust's research that indicate that almost half of the boats on our network in London are used as a permanent home.	the identification of heritage sensitivities. Notwithstanding this, the council proposes to amend Policy G4 C as follows: "Development proposals on green and open space should: (i) Be led by the purposes of nature conservation, recreation, <u>outdoor leisure and sports facilities</u> and climate change mitigation. The size of development within green and open spaces and its impact upon visual openness must be kept to a minimum." This is in line with a SoCG agreed between Sport England and Ealing. In addition, add in supporting text after Para 5.35 the following: "<u>Proposals on waterways, such as the Grand Union canal, should reflect and optimise the multi-functional nature of these spaces which can be significantly different to other forms of green infrastructure.</u>"	Add in supporting text after Para 5.35 - The multi-functional opportunities and planning considerations that relate to waterways, such as the Grand Union canal, can be significantly different to other forms of green infrastructure due to their multi-functional nature. To help maximise the multi-functional nature of waterways any impacts from proposed development on visual openness should be balanced against these considerations to ensure waterways fulfil their full potential to be multi-functional in use and in positively contributing to achieving multiple benefits. The provisions within Policy G4 are in no way proposed to restrict the multi-functional nature of the Borough canal corridors nor conflict with the provisions of London Plan Policies SI 14, SI 15, SI 16, and SI 17.

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	The Trust's data indicates that this growth has continued since the publication of the Mooring Strategy in 2010. We are keen to work with local authorities, individually or collectively, proposing to undertake assessments of the needs of boaters, as required under section 124 of the Housing and Planning Act 2016. We can provide information that we believe indicates a clear demand for more residential moorings in London, which will be valuable to local authorities in establishing need. We are concerned that the requirement to preserve and enhance the visual openness of water spaces under policy G4 may adversely affect opportunities to deliver more residential moorings, resulting in greater risks of adverse impacts on the quality of the network where residential use of waterways takes place in a legitimate but unplanned manner, without the appropriate facilities. Policy G4, particularly the need to preserve and enhance the visual openness, may also preclude the development of facilities required to support more active uses of the waterways, such as storage facilities for waters ports or towpath access ramps.		

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	Therefore, in the absence of a canal specific policy, deficiencies in the maps and figures and lack of supporting text on the canal network in the LP area, the Trust are concerned that the overall strategic approach to the canal network and its multi-functional use may be undermined and Policy G4 may preclude types of development which would support the continued management of the canal network and enhance its use. It is noted that Policy G4 is intended as a local variation to policy within the London Plan (2021) and appends new text to Policy G4 of the London Plan and should be read alongside it. It would be clearer if the supporting text specifically stated this and included clarification that the provisions within the local variation are in no way proposed to restrict the multi-functional nature of the Borough canal corridors nor conflict with the provisions of London Plan Policies SI 14, SI 15, SI 16, and SI 17. At minimum, policy G4 should be amended to include policy sections specific to canals and/or waterways, including the protection of their structural integrity, the development of		

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	moorings and the development of new infrastructure to support their access and use.		
Green Belt and Metropolitan Open Land	London Plan Policy G3 is clear that MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified. Para 8.3.3 states that in considering whether there are exceptional circumstances to change MOL boundaries alongside waterways boroughs should have regard to Policy SI 14, Waterways- strategic role and Policy SI17, protecting and enhancing London's waterways and the need for certain types of development to help maximise the multifunctional benefits of waterways including their role in transporting passengers and freight. Whilst some of the proposed MOL boundary changes would affect sections of the canal corridor the justification for these changes is not fully apparent and it is not clear that exceptional circumstances have been established to warrant these changes. For example, with regard to the addition of the Grand Union Canal to MOL parcels 7, 9 & 15 there would already appear to be a defensible boundary to the adjacent	Noted. GB/MOL boundary corrections aim to ensure that all GB and MOL sites have correct, up-to-date, and defensible boundaries. In terms of the Blair Peach site, the school clearly does not meet GB criteria, and the allotments have Community Open Space designation which protects them from inappropriate development. Unlike the school and allotments (which are opposite an industrial estate on Hillingdon's side), the towpath is an extension of the green open space on Hillingdon's side. This provides the justification for maintaining its designation. However, the council do propose to make the following modifications to MOL boundary changes, insofar as they affect the mainline Grand Union Canal, and the Paddington Arm and propose they should be deleted as follows: • Atlas ref: 10 - addition – Grand Union Canal (MOL7)	Agreed.

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	MOL parcels which would minimise the risk of inappropriate development. There is no evidence to demonstrate that there have been any significant changes to the character and use of these sites since they were designated nor anything to suggest something has changed which would necessitate and therefore justify a change to the boundary now. The LP has not quantified what the overall effect of the proposed boundary changes would be or sought to consider the significance or impact of the change on the multi-functional use of the particular sections of canal proposed to be included or the wider canal network within the borough. The Green Belt site GB7- Blair Peach Primary, currently includes a section of the Paddington Arm of the Grand Union canal. The LP proposes the deletion of the main body of this site though it seems a narrow strip of the canal corridor would remain designated green belt. The reasoning for this is not clear particularly when considering the approved redevelopment proposals for the adjacent former Southall Gas Works Site (now referred to as the Green Quarter).	• Atlas ref 15 - addition – River Brent (MOL9) • Atlas ref 28 - addition – River Brent (MOL15)	

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	The MOL boundary changes that affect the mainline Grand Union canal, and the Paddington Arm should be deleted, and consideration also given to removing the GB7 designation in its entirety.		
Chapter 3 – Spatial Strategy	Policy SP.1 – As above, the Trust welcome the repeated references to the 20-minute neighbourhood and promoting active travel/infrastructure as a key theme throughout the LP, also supporting health and wellbeing and social cohesion, reducing health inequalities and inclusive public spaces. Figure SS3 (Page 91) –does not show the canal as either a “green link” or an “active travel route”. The LP and IDP do seem to indicate that the towpath is intended as an active travel route and, as there is a designated TfL Cycleway all the way through Ealing borough along the Paddington Arm, it does seem the route should also be identified within the “Active Travel route” designation. Furthermore, if the intent is for the towpath along the Grand Union Canal south of Southall through Hanwell to also be of the same standard, it would seem appropriate that this should also be included.	The need for strong focus on waterways is accepted but given the extensive coverage already included in the London Plan (namely SI 14, SI 15, SI 16, SI 17 and others), we don’t believe that there is a need for a standalone DM type policy. There are already frequent references to the canal network throughout the plan, and primarily in chapter 4 comprising the town plans. These policies recognise the canal network as a key asset, recognising their multifunctional role and benefits. These policies identify specific town-based opportunities / priorities to be secured / facilitated via future development. Example town-based policies include G1, H1, N1, P1 & S1. Further detail is also included in specific allocations. These include the identification of opportunities / priorities to improve crossings, walking and cycling enhancements, wayfinding improvements, recreational and leisure	Agreed. The Cycle Network Plan has addressed our concerns.

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	This could be clearly set out within a canal specific policy and/or the supporting text, though as a minimum the spatial strategy map and those within the individual Town spatial strategies should be updated to clearly identify the canal corridors as “green links” and “active travel routes”.	opportunities, upgraded towpaths, and the identification of heritage sensitivities. The Cycle Network Plan route map is replacing the previously proposed primary and secondary active travel routes. In the Cycle Network Plan, the whole length of the canal towpath is designated as a green route, to make it clear that Ealing would like to see the whole towpath improved.	
Chapter 4 -Town Plans	The Grand Union Canal and the Paddington Arm of the Grand Union Canal pass through most of the Town Plan areas (TPA). As highlighted above the canal network also often straddles or is in close proximity to the TPA boundaries. It is important that the LP takes full consideration of and appropriately addresses this overall but also within each of the TPA. As above, the importance of the canal to the LP and TPA would be more apparent if it were shown clearly on all maps. As outlined previously, the Trust welcome the repeated references to the 20-minute neighbourhood and promoting active travel/infrastructure and the acknowledgment of the canal as an active travel route providing support for	Noted. Support for active travel welcomed. The Cycle Network Plan route map is replacing the previously proposed primary and secondary active travel routes. In the Cycle Network Plan, the whole length of the canal towpath is designated as a green route, to make it clear that Ealing would like to see the whole towpath improved. The council acknowledges the key role of the C&RT as a stakeholder and the need to engage on any future plans or proposals that may involve new canal crossings.	Agreed. The Cycle Network Plan has addressed our concerns.

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	improving it, access, and connection to it. The LP though refers to the 'severance' caused by the canal in a number of places (i.e. pg 229 4.3.8). While this can be true, the language is harsh and could lead to a view of the canal as a negative feature, especially as this is generally stated first in the relevant sections with the benefits of the canal often not highlighted for several points. The LP also does not seem to consistently refer to the canal as a "green link" and "active travel route" and the difference between a 'primary' or 'secondary' active travel routes and the expectations for them is also not clear. Furthermore, there is no detail on the 'green connections' identified on the maps or consideration as to whether any improvements may be required at these points, the impacts of any works and how they would be funded.		
Development site Greenford – 04GR Westway Cross	Whilst this site is set back substantially from the canal corridor it should consider the potential to result in increased footfall along the towpath and provide any necessary mitigation to address this. The key infrastructure requirements for this site include 'measures to improve active travel'. As we have highlighted elsewhere there should be consistent references throughout the LP that the canal corridor is a "green link" and	Noted. The council propose to make the following suggested modification: Add a new contextual consideration as follows: <u>"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."</u>	Agreed. The Cycle Network Plan has addressed our concerns.

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	“active travel route” to ensure future decision makers are clear that such infrastructure requirements also relate to the canal corridor.		
Hanwell Town Plan	As we have highlighted elsewhere sections of the canal network are coincident with the administrative, Town Plan area boundaries and conservation area designations and as such the canal corridor becomes somewhat lost on the maps and figures within the Plan. Figure H1 shows the alignment of the canal, and it is highlighted as being a designated conservation area along its length. However, other plans seem to show its alignment slightly differently, particularly around the Hanwell flight where the river and canal diverge and the section of the canal at the southernmost part of the Hanwell area, again where the river and canal diverge, is also missing on some plans. These should be amended accordingly. It is encouraging that Policy H.1 continues to refer to 'heritage led' regeneration along the GUC, though further detail as to what this will entail would be beneficial, as would an explicit mention of the Hanwell Flight as a Scheduled Monument and its heritage significance. The Trust is	Noted. See earlier comments regarding the Cycle Network Plan.	Agreed. The Cycle Network Plan has addressed our concerns.

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	developing a project to submit for a Lottery Bid with an aim to remove Hanwell Flight from the heritage at Risk Register and this will require co-ordination and support from the Council. Policy H1 Part C iv) refers to the potential for widening the canal towpath and provision of additional crossings. The Trust welcome the support for towpath improvements, including path widening (where possible) and improved surfacing to improve the accessibility of the towpath and access to it. As advised previously, any proposals for crossing of the canal would need to consider the impacts on the canal corridor and its users, for example character and appearance, heritage, canalside habitat, navigational safety, and structural integrity. As set out above, we would also encourage the council to consider the impact of policy G4 on such proposals and, whilst we are not advocating additional bridges over our canals, we suggest that inconsistencies between the aspirations of the IDP and policy G4 provides further evidence of the need for changes to policy G4. Any crossings would also need to include pedestrian and cycle access to/from the		

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	canal towpath via a suitable graded access to improve walking and cycling connectivity with the towpath. It is likely that in the absence of properly designed access points informal access would be created by those wishing to access the canal corridor. This would adversely impact on visual amenity and could lead to adverse impacts on structural integrity. The provision of any new crossings would also likely increase usage of the towpath and so any such proposals would be required to include details as to how enhancements to the towpath to mitigate any impact would be addressed. Any bridge crossings would need to be agreed with the Trust and be subject to our commercial agreements. Detailed design /drawings including foundation details and construction methodology for bridge crossings would be required and all works would need to adhere to the Trust's 'Code of Practice for Works affecting the Canal & River Trust'. In addition, full details on the future ownership, maintenance and technical approval authority for any bridges would also be required and it should be clearly noted that the Trust will not take on the future ownership or maintenance of any bridge crossing.		

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	It is also not clear that these requirements for any potential canal crossings have been fully considered in the IDP. As a minimum the considerations in relation to canal crossings and need to consult the Trust as a key stakeholder should be referenced in the supporting text within the LP to ensure applicant's/developers are fully aware of the requirements at the earliest possible stage. The "secondary active travel route" now shown on Figure H2 does not seem to follow the towpath and where it crosses the canal it appears to utilise existing crossings except potentially around the area where the canal and river diverge to the north. Further clarity on this should be provided as the intentions here are not clear and there are no specific references to a new bridge crossing at this location within the LP or TPA and the potential impacts of any new bridge crossing on the Hanwell flight also do not appear to have been considered.		
Northolt Town Plan	As we have highlighted elsewhere sections of the canal network are coincident with the administrative, Town Plan area boundaries and conservation area designations and as such the canal	Noted. See earlier council comments on cartography.	Agreed. The Trust acknowledge the issues with paper-based maps. On the basis that the Interactive Policies

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	corridor becomes somewhat lost on the maps and figures within the Plan. This issue is clearly evident within this TPA. The canal is identified within figure N1, albeit overlaid with the conservation area designation. However, within figure N2 the canal is shown to be outside the Northolt area. There is also a new addition of a development site, 10NO Airways Estate which although included within this section appears to be located wholly outside the Northolt Town Plan area.		map is clear and any spatial plan in the Local plan defers to the interactive map the Trust consider this would be sufficient to address our comments in relation to mapping.
Development site Northolt – 04NO Northolt Driving Range	The site boundary as shown appears to include land within the ownership of the Canal & River Trust which is currently leased to a Third party who provide boating services and leisure and residential moorings. The land within the Trust's ownership is not available for development. Any proposals for this site would need to consider the existing moorings and the existing boat business, which includes activities such as chandlery and boat repairs. The contextual considerations state that consideration should be given to impacts on the canal though there is no mention of the existing moorings and boat business nor is the canal identified as a designated conservation area and part of	Noted. The council propose the following suggested modifications: Amend boundary to exclude land within the ownership of the Canal & River Trust and adjust site area to 4.51 ha. Amend 'proposed use' text as follows: "Employment-led, mixed-use scheme <u>including leisure/sport use</u>". Add "<u>Canalside, northwest part Conservation Area (adjacent)</u>" and "<u>Blue Ribbon Network (adjacent)</u>" to 'Planning Designations / Site Constraints'. Add a new 'contextual consideration':	Agreed.

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	the Blue-Ribbon Network in the site constraints. The proposed use is stated as 'employment-led, mixed use' though there is no indication on the level of employment that would need to be provided for it to be truly 'employment-led' or any detail on the quantum of proposed residential for this site which would assist in setting realistic design principles for the site. The extent of the site boundary should be clearly established and should not include any land within the Trust's ownership. The existence of the moorings and boat yard use should be clearly acknowledged. If developed, improved access to the canal could be explored, including an accessible ramp from Rowdell Road link/Bridport Road (and accessibility through the industrial park), and improved connections to the active travel network.	<u>"Any development proposals should consider impacts on the existing canal moorings for residential amenity and protect operations of the boat yard business."</u> Amend the 4th 'design principle' as follows: "Improve <u>connections to the active travel network including</u> pedestrian routes to and through the site and connections to green space <u>and explore improved access to the canal including an accessible ramp from Rowdell Road link/Bridport Road."</u>	
Development site Northolt – 10NO Airways Estate	This is a new proposed development site which is located to the north of the Paddington Arm of the Grand Union canal. The canal is within a cutting at this point and is below the level of the site. It is important to ensure that any development does not adversely affect the stability of the cutting slope, as this	Noted. The council propose the following suggested modification: Add new bullet point at the end of 'Contextual Considerations' as follows: <u>"The site is bounded to the south by the Grand Union Canal. The canal is within a cutting at this point and below</u>	Agreed.

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	could significantly increase the risk of damage to the adjacent canal. In the light of the NPPF/NPPG, the planning system has a role to play in minimising the risk and effects of land stability on property, infrastructure, and the public.	<u>the level of the site. Any development should not adversely affect the stability of the cutting slope, as this could increase the risk of damage to the adjacent canal.</u>	
Perivale Town Plan	Policy P.1 still refers to the provision of 'new and improved' canal crossings in addition to the provision of an 'enhanced canal crossing that will connect the eastern edge of Horsenden Hill with an active travel route through Horsenden Hill to provide a connection to Sudbury Hill'. It is therefore difficult to determine whether the principle of additional crossings would be acceptable to the Trust. Any proposals for crossing of the canal would need to consider the impacts on the canal corridor and its users include pedestrian and cycle access to/from the canal towpath via a suitable graded access to improve walking and cycling connectivity with the towpath. Any bridge crossings would need to be agreed with the Trust and be subject to our commercial agreements. In addition, full details on the future ownership, maintenance and technical approval authority for any bridges would also be required and it should be clearly noted	Noted. The council is keen to engage with the Canal & River Trust as bridge/crossing proposals are further developed. The council propose the following suggested modification: Amend Policy P1 D (vi) as follows: <u>"Investigate the potential for a</u> Providing an enhanced canal crossing that will connect into the eastern edge of Horsenden Hill, with an active travel route through Horsenden Hill to provide a connection to Sudbury Hill.	Agreed.

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	that the Trust will not take on the future ownership or maintenance of any bridge crossing.		
Development site Southall – 09SO Havelock Estate	It is understood that redevelopment proposals have already been approved and partially implemented though the timeframe for progress on later phases of the development is not clear. There are some improvements to the Havelock Road canalside space being delivered by the Southall Wellbeing Way project, along with towpath improvements adjacent to the Havelock Estate and wellbeing opportunities. It is not clear if this is Canalway Park referenced or if that is the new park within the new housing area. Further clarity on this should be provided. The design principles for this site state that designs should concentrate building height in prominent locations such as the canalside. Whilst this may provide scenic views for those within the development, it needs to be ensured that the character and appearance of the canal corridor is also maintained. The canal is a designated conservation area and retains a landscaped character. Developments should therefore also be required to consider the impacts on users of the waterway and any key views along the	Noted. The intention is to connect all green spaces in the area. The council propose the following suggested modification: Add new contextual consideration as follows: <u>“The canal is a designated conservation area and retains a landscaped character. Developments should therefore also be required to consider the impacts on users of the waterway and any key views along the canal corridor or from nearby assets, such as locks and bridges.”</u> Amend the 6th Design principle as follows: “Design should concentrate building height in prominent location such as the canal side, opposite Bixley fields, along primary streets and opposite public open spaces to improve wayfinding and to maximise scenic views.”	Agreed.

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	canal corridor or from nearby assets, such as locks and bridges.		
Development site Southall – 13SO Endsleigh Industrial Estate	The site boundary for this proposed development site has been extended and now includes Adelaide Dock. Adelaide Dock is a major and essential operational base owned and managed by the Canal & River Trust. The land the Trust own here is not available for development. The dock is an extremely important part of the canal infrastructure and essential for the continued operations of the Trust in ensuring safe navigation and undertaking our statutory duties throughout the canal network in Ealing and beyond. It is vital that this essential Dock Yard use is protected, and we are opposed to any scheme which may affect its continued operation. The contextual considerations do not refer to the existing Dock Yard. The impacts on its continued operation, relationship of any development to the Dock and issues such as access, noise, odour etc have not been fully considered and there are significant concerns with residential use being proposed on site 13SO due to the potential conflict with the Dock Yard use and the essential operational requirements the Trust have.	Noted. The council propose the following suggested modifications: Amend the proposed use to say: “Residential led, mixed use scheme (including some Industrial) <u>with the retention of the Adelaide Dock.</u>” In 'contextual considerations' addition of the following text after the first bullet point: <u>"Adelaide Dock Yard is owned and managed by the Canal & River Trust who must be consulted on any development proposals. It 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. Any development proposals must ensure the continued operation of the dock and its many functions."</u> Delete the second and third design principles of 13SO and replace it, as follows: <u>"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</u>	Agreed.

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	The contextual considerations state that opportunities exist to form new access to the east at the corner of Whitley Gardens and through Gilding Way. It is not clear how this could be achieved though without adversely impacting on the waterspace within the dock or the dry dock. The design principles also state that the site should take advantage of a co-ordinated layout and servicing arrangement with 14SO, though how this would be achieved is not clear as the sites are physically separated from one another with intervening residential development.	<u>in general, routes and industrial access will generally exit to the north of the site. East-west 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."</u> In 'design principles' addition of the following after the 5th bullet point: <u>"Development will need to take into account the 24 hour/7 days a week operation of Adelaide Dock and address potential issues such as noise, access and odour resulting from the dock's operational requirements."</u>	
Development site Southall – 14SO Witley Works	This site is located further to the east of Adelaide Dock and does not currently utilise the same access as the Dock Yard. The design seek a co-ordinated layout and servicing arrangement with 13SO though how this would be achieved is not clear as the sites are physically separated from one another with intervening residential development. It is positive to note that the design principles require enhancement of the towpath and any proposed development is also required to achieve a more	Noted. The council propose the following suggested modifications: Add the following as a 2nd bullet point to 'contextual considerations': <u>"Development proposals will need to consider the continued operations of the adjacent Adelaide Dock Yard and ensure they are not adversely affected by engaging with the Canal and River Trust at the earliest possible stage."</u> Delete the second design principle of 14SO and replace it as follows:	Agreed.

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	engaged and active frontage to the canal corridor which is positive. The development site here should also be required to consider the potential for incorporating mooring and boating facilities, by measures such as providing electricity, water and space for waste/recycling and cycle storage. Any access to the canal from the site though would require separate commercial agreements with the Trust and the need to engage with the Trust at an early stage could also be included to ensure applicant's/developers are aware at the earliest possible stage. Whilst separated from the Adelaide Dock Yard any development should still be required to consider any issues such as access, noise, odour etc to ensure the continued operation of the Dock Yard is not adversely affected.	<u>"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."</u> Add the following after the 4th bullet point: <u>"Development proposals should consider the potential for incorporating mooring and boating facilities and should achieve a more engaged and active frontage to the canal corridor."</u> and <u>"Development will need to take into account the 24 hour/7 days a week operation of the adjacent Adelaide Dock and address potential issues such as noise, access and odour resulting from the dock's operational requirements."</u>	
Development site Southall 15SO-Monorep site	As identified in the LP the site is within the St Marks Church and canal Conservation area and is adjacent to the Grade II listed Bridge 204, Glade Lane Bridge, walls, gates, sluices, and lock no.90. The reference in the contextual considerations to 'Lock 90, Hanwell Flight'	Noted. The council propose the following suggested modifications: Amend 'key infrastructure requirements' as follows:	Agreed.

Reference	Summary of Issues	Ealing Response	CRT Response
	though should technically be 'Norwood Top Lock' as it is not part of the Hanwell Flight, nor in Hanwell. The canal is also in a cutting at this point and as part of the Design Principles any development should be required to consider the potential impacts to the canal heritage and infrastructure. The current Design principles require improvement to the pedestrian link from Glade Lane, improvements to providing an accessible route to the towpath avoiding the steep ramp under Glade Lane bridge at Top Lock could also be included and the requirement to support these enhancements should be included in the key infrastructure requirements for the site for clarity. The site was also sold by the Trust, and any future applicant/developer is advised to contact the Trust's Estates Team to discuss any restrictive covenants which may be in place.	" Community centre, public realm, landscaping and greening improvements, <u>pedestrian link and accessible route from Glade Lane to towpath.</u>" Amend 'contextual considerations' 2nd bullet point as follows: "... is situated next to the statutory Grade II listed walls, gates, sluices & bridge at <u>Norwood Top</u> Lock, 90, Hanwell Flight <u>Glade Lane.</u>" Amend the 2nd 'design principle' as follows: "Development proposals for this site should capitalise on the site's location next to the Grand Union Canal and situation within the St Mark's Church and Canal Conservation Area, whilst <u>considering the potential impacts of development on the canal's infrastructure and heritage.</u>" Amend the 8th 'design principle' as follows: "Improve the pedestrian/cycle link from Glade Lane to the canal, <u>including an accessible route to the towpath, enhancing to enhance</u> connectivity to the site."	
Development site Southall - 1950 Cranleigh Gardens Industrial Estate	Some development proposals for this site have already been considered/submitted to the Council with the scheme for the northern part of the site already being built out. The requirement for any further development to consider access to the	Noted. The council propose to make the following suggested modifications: Add a second 'contextual consideration' as follows:	Agreed.

Reference	Summary of Issues	Ealing Response	CRT Response
& Kingsbridge Crescent	towpath and support towpath improvements to mitigate increased use is positive. Any access to the canal from the site though would require separate commercial agreements with the Trust and the need to engage with the Trust at an early stage could also be included to ensure applicant's/developers are aware at the earliest possible stage.	<u>"Development proposals should include early engagement with the Canal and River Trust to secure separate commercial agreements for access to the canal from the site."</u> After the second 'design principle', add a new design principle as follows: <u>"Development adjacent to the canal should enhance the waterside environment and biodiversity by demonstrating a high design quality which respects the historic significance of the canal and character of the waterway and provides access and improved amenity to the waterfront. The development should make a significant contribution to the improvement of the canal."</u>	
Development site Southall 20SO Hambrough Tavern	It is understood that a recent scheme for a tall residential-led development on this site did secure improvements to the canal corridor. It is therefore positive to note that the need to support improved canal access, public realm, and landscaping improvements, which would aid in designing out antisocial behaviour issues, have also been included within the key infrastructure requirements for this site.	Noted and support welcomed.	Noted.

Reference	Summary of Issues	Ealing Response	CRT Response
Development site Southall - 21SO Toplocks Estate	The provision of an accessible route to the Grand Union Canal mainline via Baxter Close, to avoid the steep ramp beside Norwood Top Lock under Glade Lane Bridge, should be included in the key infrastructure requirements for this site. The site also closely adjoins Maypole Dock which is located to the west of the site. Although not owned by the Trust, Maypole Dock is linked to the Grand Union Canal mainline. There are boats moored along Maypole Dock and any development or proposals to improve access will need to consider these existing moorings and this should be referenced in the contextual considerations. Within the 'planning designations/site constraints' Glade has been misspelt as 'Galde'.	Noted. The council propose to make the following suggested modifications: Amend 'planning designations/site constraints' as follows: "Flood Zone 3a (surface water), Canalside CA (adjacent), Grade II Listed Glade Galde Lane Bridge (adjacent), SINC (local)..." Amend key infrastructure requirements as follows: "Reprovide health and children's facilities, the community centre and the substation. Measures to improve active travel, and green links <u>and an accessible route to the Grand Union Canal mainline via Baxter Close.</u> Under contextual considerations add a new bullet point after the third bullet point as follows: "<u>The site closely adjoins Maypole Dock which is linked to the Grand Union Canal mainline and any development proposals will need to consider these existing moorings.</u>"	Agreed.

Signed confirmation:

The contents of this Statement of Common Ground are agreed for the purposes of the examination of the Ealing Local Plan submitted in November 2024.

Signed on behalf of the Canal and River Trust:		
Name and position	Signature	Date
Anne Denby Area Planner		28.10.25

Signed on behalf of Ealing Council:		
Name and position	Signature	Date
Steve Barton, Strategic Planning Manager, Ealing Council	<i>Steve Barton</i>	28.10.25