

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

Ealing Council
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Tel 020 8825 8056

Your ref

My ref
CR/029

Extension
8056

Date
23rd January 2026

Dear Sir/Madam,

**Examination of the Ealing Local Plan 2024-2039:
Ealing LPA's Response to Post Hearing Action Logs,
Block 2, Part 2 - Dealing with items 4.14, 4.19, 9.9 and 9.28**

I wrote to you setting out a record of the agreed log of actions on 24th December 2024 that arose from the hearing sessions that dealt with Block 2, Matters 4 and 6-10 between 2 - 11 December 2025. This letter provides the second batch of council responses relating to Action Log items mentioned above.

Matter 4 - Housing

Action 4.14 – SP3.1D – To provide a note on the treatment of potential GRT transit sites/nomadic families and to review the supporting text to reflect the future joint work being undertaken.

LPA Response: Although there is currently no requirement for boroughs in London to provide transit sites, Ealing has actively considered their provision.

The Regulation 18 Ealing Local Plan in SP3: Fighting Inequality, D, and paragraph 3.29 included looking at establishing a dedicated transit site.

Unfortunately, no suitable site was found at the time, and the proposition for a transit site was not taken forward into the Regulation 19 Ealing Local Plan. Ealing, however, is still looking at investigating the potential for a transit site, either in partnership with neighbouring local authorities, or on its own in the near future as part of the Local Plan review.

The recently published London-wide Gypsy and Traveller Accommodation Assessment, November 2025 states that there is a need for 87 transit sites across London, based on the MHCLG Traveller

Count (between 2016 and 2024), although geographical locations or borough level assessment of need is not currently provided.

Ealing's Gypsy and Traveller Accommodation Assessment, November 2025 (GTAA){EX34} found that there was at present "no identified need for dedicated transit provision" (see Ealing GTAA Paragraph 5.9). The Transit Recommendations in Ealing's GTAA (see Paragraphs 7.33 to 7.38) are that in the short term, the level of encampments should continue to be monitored and reviewed on an annual basis to establish whether there is a need for new transit provision or emergency stopping places, or whether the current managed approach is preferable.

In the longer term, Ealing will work with neighbouring authorities and the Mayor of London to conduct further work on assessing need for a transit site/transit sites in the area, and how that need could be delivered. This matter will be considered as part of Ealing's next Local Plan review.

To reflect future joint working on meeting any future need for a transit site, the council proposes a further new suggested modification as follows:

After Paragraph 3.39 add the following supporting text in a new paragraph as follows:

"The council anticipates further work with neighbouring authorities, and at a wider London scale, to assess the need for transit sites and bring forward plans for delivery of a suitable site(s)."

Action 4.19 - SP 4.3 A -To explore how the LPA can update the trajectory base date and content to demonstrate a 5-year housing land supply at adoption. {Part}

LPA Response: See attached paper.

Matter 9 – Development Sites

Action 9.9 - 03AC Ealing Common Depot - To incorporate the further suggested modifications arising from the Statement of Common Ground between Ealing Council and Places for London regarding 03AC, Ealing Common Depot in a revised Schedule of Suggested Modifications. To give consideration to including the tall building threshold height for the purposes of clarity.

LPA Response: New suggested modifications are proposed mainly arising from a Statement of Common Ground between Ealing Council and Places for London as follows:

Amend "Tall Buildings" as follows:

"The site is ~~not~~ in principle suitable for tall buildings. The threshold height for a tall building is 7 storeys (24.5 metres).
Exact heights will be subject to a design-led approach and detailed heritage and townscape analysis at the planning application stage, taking into account the particular constraint of impacts upon Kew Gardens."

Add a new "Contextual Consideration" after bullet point 6 as follows:

"There is potential for this site to affect the broader setting of Kew Gardens and so an assessment will be required at planning application stage in accordance with the UNESCO guidance and toolkit."

Amend the 4th "Design Principle" as follows:

"~~Limit to 6 storeys (21m)~~ Building height ~~to 6 storeys (21m)~~ should reflect the constraint of relocating the existing museum storage depot, it is anticipated that the highest elements are situated to the north and west of the site, alongside the railway line."

The SoCG with Places for London had proposed deleting the reference under "Tall Buildings" which stated:

"The threshold height for a tall building is 7 storeys (24.5 metres)."

On reflection, we think this is not helpful as it is merely a statement of fact arising from the Tall Buildings Study and suitable flexibility in the policy is now provided by the deletion of "not" in the first sentence and the newly added third sentence.

Action 9.28 - Generic (refers to 16 separate development sites) - To provide a note on the justification for suggested modification SMM126 regarding water mains apparatus and infrastructure.

The proposed suggested modification arises from representations made by Affinity Water Ltd at Regulation 19 (see S21). Following a review of the sites for potential allocation in the Plan, Affinity Water identified a number of areas where their mains apparatus intersects sites for future development or the redevelopment of existing sites. They argued that:

"This may affect development potential in some cases, as no development will be permitted within a specified distance of these

services. Where there is potential to impact the existing water network, we would expect these impacts to be fully considered and for developers to discuss these with us early in the process. Please note that we have water mains within all town centre boundaries.

We will not provide comment on these individually at this stage as they are extensive but would expect developers to engage with us as early as is practicable to ensure that these are taken into consideration as plans are developed.

For trunk and raw water trunk mains within or adjacent to sites and their boundaries, there will be no building, planting or other heavy earth works within a minimum of 4 metres of these mains.

For our other mains there will be a minimum 2-3 metre no dig exclusion zone unless the mains are to be diverted with the costs for this needing to be met by the developer.

We have listed potentially impacted sites which have infrastructure in the vicinity of site boundaries, which development plans will need to take account of."

Affinity Water also make reference to their guidance on working near their assets.

The following sites were identified as having significant mains apparatus in the vicinity of site boundaries:

- 01SO Southall Crossrail Station
- 18SO Golf Links Estate
- 10SO The Green
- 01HA Ealing Hospital
- 09SO Havelock Estate
- 11SO The Green Quarter
- 07NO Yeading Lane
- 08SO Middlesex BC
- 19SO Cranleigh Gardens
- 14SO Witley Works
- 02NO Mandeville Parkway
- 08NO Grange Court
- 10NO Airways Estate
- 17SO Great Western Triangle Centre
- 01NO Car Sales & Northolt Leisure Centre
- 21SO Toplocks Estate

Proposed suggested modification SMM126 therefore proposes that additional text be added to each of these 16 sites under the "Contextual Considerations" as follows:

"Significant water mains apparatus and infrastructure have been identified within the vicinity of this site, and applicants are advised to engage with the relevant water supplier at the earliest opportunity."

Please let me know if you require any further information or clarification on these matters.

Yours sincerely

Steve Barton

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