

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

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Your ref	My ref	Extension	Date
	CR/031	8056	29th 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 4 - Dealing with items 6.2, 6.3, 6.4, 6.5, 6.6, 8.5,
8.7, 8.9 and 9.14.**

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 fourth batch of council responses relating to the Action Log items mentioned above.

Matter 6 - Design and Amenity, Tall Buildings and the Historic Environment

Action 6.2 – Policy D9 - To provide a short note setting out how the Kew Gardens Screening Report was conducted and how it relates to the Tall Building evidence base, including confirming whether it was available as the time the evidence base was compiled.

LPA Response: The Kew Gardens Screening Report was conducted according to UNESCO guidance (Guidance and Toolkit for Impact Assessments in a World Heritage Context, 2022) and under the advice of Historic England. The screening documents in written form the analysis that was undertaken during the production of the Tall Buildings Strategy. Analysis at this time had taken into account the effect of planned tall buildings heights across the World Heritage Site with a particular focus on the kinetic views identified as important in the Management Plan. The information contained in the Screening Report was therefore available to the council in recommending tall buildings heights, but the report itself was only produced to document in written form what had been a more extensive process of testing static and moving views across the World Heritage Site.

Action 6.3 - Policy D9 F - To provide a note clarifying:

A. The intention of this part of the policy, specifically whether it is intended to apply to (1) any site not proposed for allocation that exceeds the thresholds set out in Table DMP1, (2) sites proposed for allocation, or (3) both.

LPA Response: Clause F is intended to apply to development both on and off of allocated sites. However, it is not intended to apply an exceptionality test, and the policy does not set out criteria that would provide for such a test. Instead, the policy is intended to guide tall buildings to allocated sites, and to apply the defined thresholds to all sites as a method of determining when development becomes tall in its respective area. Wording to clarify this approach is set out in response to Question G below.

B. What the Council's specific justification and evidence is for the intended approach, including any assessment of effects on delivery.

LPA Response: The evidence for this approach is set out in the Tall Buildings Strategy itself {EB45, EB45 A & B}, which provides design and contextual analysis for the heights proposed. These heights have also been taken into account in the housing trajectory and are not expected to have any impact upon the council's identified housing capacity.

C. Why the exceptional circumstances test in (F) is necessary, proportionate, justified and clear, including what might be regarded as an exceptional circumstance.

LPA Response: No exceptional circumstances test is proposed; this is clarified in the proposed wording set out in the response to Question G below.

D. Why (F) is needed in light of the Impacts requirements at D9 (C) providing a detailed set of policy considerations for tall buildings? Why would leaving any proposal that meets the Council's definition of a tall building by exceeding the thresholds to be considered under D9 (C) without the need to show exceptional circumstances be inadequate?

LPA Response: Clause F is necessary to apply the tall buildings thresholds and clarify that identified sites perform the role set out for local plans at London Plan Policy D9 (B).

E. In relation to specific allocations, how is the need to provide exceptional circumstances in D9(F) consistent with the Council's suggested modifications across the Plan to remove references to maximum heights and replace with 'Design analysis indicates an

appropriate height of up to...’ with the aim of introducing more flexibility?

LPA Response: The modification brings Ealing’s local plan into line with the London Plan wording and was recommended and agreed with GLA as necessary for general conformity. As set out above no exceptionality test is proposed, and this is clarified in the proposed wording in answer to Question G below.

F. What would the practical and policy effect be if the Plan were modified to remove D9(F)?

LPA Response: Removal of the clause would leave the significance of tall buildings thresholds open to question and also risk failing to satisfy the requirements of London Plan Policy D9 (B).

G. If necessary, what modifications would the Council recommend to the wording of the policy to improve clarity?

LPA Response: It is suggested that a modification to improve clarity be made as follows:

Amend Policy D9 F as follows:

“Tall buildings above defined thresholds ~~are exceptional and~~ should be located upon specified Development Sites defined in the Development Plan.”

Action 6.4 - Policy D9 G - To consider rewording the policy to improve clarity or moving it to supporting text.

LPA Response: The clause was originally in supporting text but both GLA and Historic England proposed it be added to the policy wording. In hindsight, it would have been more appropriate to have left it in supporting text.

It is suggested that modifications to improve clarity are made as follows:

Amend Policy D9 G as follows:

~~“The tall buildings threshold height is simply that and not a presumption that any height up to this is automatically acceptable.”~~

Amend supporting text Para. 5.15 as follows:

“All sites that may be appropriate for tall buildings are identified in Development Sites appended to each of the Town Plans in Chapter 4. Heights listed in site allocations are the product of detailed design assessment, nevertheless they remain subject to a full design assessment at the point of application against the impact policies set out in London Plan Policy D9 C. **The tall**

buildings threshold height is simply that and not a presumption that any height up to this is automatically acceptable."

Action 6.5 - Policy DAA - To consider rewording of the introductory sentences of the policy to improve clarity and effectiveness.

LPA Response: It is suggested that modifications to improve clarity and effectiveness are made as follows:

~~"New development must achieve a high quality of environment in itself and also in its effect upon its neighbours and surroundings and important local features. This should take a sequential approach of first achieving a high level of amenity through design, and then mitigating any adverse impacts. In particular, dD~~ development should ensure:

- (i) protection of sensitive uses within or outside the development **site;**
- (ii) high quality design;
- (iii) good levels of daylight and sunlight;
- (iv) good levels of privacy;
- (v) positive visual impact; and,
- (vi) a positive contribution to health and wellbeing."

For the avoidance of any doubt, Clause (vi) arises from the second part of the suggested modification proposed at SM127 that arose from a SoCG between Historic England and the council.

Action 6.6 - Policy DAA - To consider rewording the suggested modification at SMM127 in relation to "important local features."

LPA Response: "Important local features" no longer sits well within the policy given the necessary changes set out in the answer to Action 6.5 above. Nor does it fit well within Clause (i) because national and regional policies make clear that heritage protection is more than just a function of design. This point is considered to sit better in its proper context within the heritage policy set out in the London Plan, Policy HC1 C.

It is therefore proposed that the first part of the suggested modification proposed at SMM127 not be taken forward as follows:

~~"New development must achieve a high quality of environment in itself and also in its effect upon its~~

~~neighbours and surroundings and important local features....."~~

Matter 8 – Town Plans

Action 8.5 - Policy E4 - To define (within the supporting text) what is meant by 'reinforcing neighbourhood centres'.

LPA Response: It is suggested that a modification to improve clarity is made as follows:

Amend Policy E4 (i) relating to Southern Ealing and Ealing Common as follows:

" Reinforcing **town centre uses within the** neighbourhood centres at Northfields and South Ealing."

Action 8.7 - Policy G6 - To consider how to strengthen the wording of limbs (iv) and (v) to improve effectiveness.

LPA Response: It is suggested that modifications to improve clarity are made as follows:

Amend Policy G6 (iv) and (v) relating to the Greenford Industrial Estate as follows:

(iv) ~~Exploring opportunities for~~ **Providing** active frontage to industrial units, particularly where these can showcase existing industrial uses and contribute to facilities for local people and workers.

(v) ~~Exploring opportunities to~~ **Diverting** goods movement from residential roads.

Action 8.9 - Policy N3 - To consider a modification emphasising the importance of the masterplan led approach.

LPA Response: It is suggested that modifications to improve clarity are made as follows:

Amend Policy N3 relating to the White Hart Neighbourhood Centre as follows:

"To create a ~~diverse and attractive~~ new White Hart Neighbourhood Centre **by means of a masterplan-led approach that** brings together existing small shopping parades that ~~will~~ complements Northolt Town Centre and **will** contribute to the regeneration of the wider area by:

(i) Reconfiguring the existing roundabout to deliver improved connectivity, new homes and create a more vibrant local town centre that meets the everyday needs of local residents

- (ii) ~~Using a masterplan-led approach and, where necessary, land assembly to~~Optimise opportunities for development, through land assembly where necessary, with improved public space, and better links the areas on different sides of the roundabout and create a better sense of place and community.
- (iii) Providing an enhanced bus and mobility hub that improves local accessibility, promotes..."

Matter 9: Development Sites

Action 9.14 - 03SO Fmr Sorting Office and Kings Hall Methodist Church - To provide a note on the latest position regarding the fmr sorting office part of the site allocation.

LPA Response: Planning application PP/2015/4921 for Fmr Sorting Office (96 South Road) was granted in February 2017. Subsequently, a number of pre commencement conditions have been discharged (193653CND, 200990CND, 201453CND, 201243CND, 222764CND) and an application for a Minor Material Amendment (222363VAR) approved. This shows that the developers are serious about implementing the permission, however it is possible that building works have stalled recently.

The permission for 41 units for the Fmr Sorting Office has been used to inform the phasing of the development but not the trajectory and overall capacity for the site allocation. The Tall Buildings study looked at the site as a whole and provides the best indicator of potential capacity for the site.

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

Yours sincerely

Steve Barton

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