

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/033**

Extension  
**8056**

Date  
**20th February 2026**

Dear Sir/Madam,

**Examination of the Ealing Local Plan 2024-2039:  
Ealing LPA's Response to Post Hearing Action Logs,  
Block 2, Part 5 - Dealing with items 4.13, 4.17, 4.21, 4.22, 8.8,  
9.5 and 9.19.**

I wrote to you setting out a record of the agreed log of actions on 24<sup>th</sup> 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 fifth batch of council responses relating to the Action Log items mentioned above.

**Matter 4 - Housing**

***Action 4.13 - P 3.1 D - To provide a note on the council's position regarding the London Wide Gypsy and Traveller Accommodation Needs Assessment, Mayor of London/GLA, November 2025.***

**LPA's response:** The London-wide Gypsy and Traveller Accommodation Needs Assessment (GTAA) was published in November 2025, shortly before the commencement of Ealing's Local Plan Block 2 hearings.

RRR Consultancy Ltd was commissioned in 2022 by the Mayor of London/Greater London Authority (GLA) to undertake a London-wide GTAA. This work fulfilled a commitment in the London Plan (2021), following a recommendation in the Inspectors' Report on the Examination in Public. The assessment commenced in 2022 and was intended to cover the period 2022/23 to 2031/32, forming a key element of the evidence base for housing and planning policy for the Mayor/GLA and the London boroughs.

A Steering Group was established by the consultants to provide advice and oversight. This comprised officers from five London boroughs—Enfield, Hackney, Havering, Kensington & Chelsea and Southwark—

together with representatives of the London Gypsy, Roma, Traveller and Travelling Showpeople (GRTTS) community. Notably, no west London boroughs were included on the Steering Group.

Throughout the assessment process and subsequent feedback sessions, a number of boroughs voiced significant concerns regarding the consultants' methodology, approach, data quality and the validity of the results. The London-wide GTAA has been a standing item on the West London Alliance Planning Policy Officers' (WLA PPO) agenda since its inception, and minutes from several meetings record ongoing confusion and dissatisfaction with the work. For example, the minutes of the WLA PPO meeting on 16 May 2024 state, in relation to the London-wide GTAA:

*"Who is confident with the figures? 4 boroughs confused, 1 not happy. Poor feedback from GLA and consultants on this work. Not clear where they have surveyed and most data is aggregated and therefore cannot be interrogated."*

In June 2024, Ealing officers contacted the GLA to highlight that, across the west London boroughs, significant concerns persisted regarding the methodology, approach and arithmetic underpinning the needs-based assessment for new pitches, among other issues.

A particular concern for Ealing officers relates to the consultants' claim that they achieved a 100% interview rate with residents at the Bashley Road Traveller site, located in the OPDC area. However, researchers from Opinion Research Services (ORS)—commissioned to prepare Ealing's recent GTAA—reported that residents at Bashley Road stated they had not been contacted by RRR Consultancy at any point. When this discrepancy was raised with RRR, the consultants suggested that residents might have forgotten due to the time elapsed since the purported survey work.

It should also be noted that, prior to publication, the consultants did not provide boroughs with a copy of the detailed Draft GTAA. This document sets out the methodology, primary and secondary data sources, key assumptions, definitions, and measures taken to ensure the validity and reliability of the findings. The absence of this information made it difficult for officers to scrutinise the summary report, identify potential issues, or assess the robustness and reliability of the methodology used to calculate accommodation needs.

Due to the number of concerns raised by London boroughs, the GTAA experienced repeated delays while these issues were revisited. As a result, Ealing remained reliant on its outdated 2018 GTAA, which had been conducted using the 2015 definition of Gypsies and Travellers. Despite assurances that the London-wide GTAA would be available in summer 2025, ongoing delays meant that Ealing could no longer depend on it for the Local Plan evidence base. Combined with broader

scepticism regarding RRR Consultancy's methodology, Ealing therefore commissioned ORS in summer 2025 to undertake an update of the 2018 GTAA, ensuring a more robust, reliable and up-to-date assessment of future accommodation needs for Gypsies and Travellers in the borough.

In summary, Ealing's position is that the London-wide GTAA (November 2025) does not provide a sufficiently robust or reliable evidence base for the Local Plan, due to significant concerns regarding its methodology, data quality, and unresolved discrepancies.

***Action 4.17 – New Policy GTW (arising from suggested modification FSMM39) - To provide a note on whether Limb A of the draft policy is justified and make reference to the inclusion of a planning condition restricting occupancy in the supporting text.***

**LPA response:** With the benefit of hindsight, Limb A is not justified, and the council propose that it now be deleted. In relation to the point made about occupancy, a suggested amendment is now proposed.

For clarity and the avoidance of doubt, the amended Policy GTW and supporting text should now read as follows:

"Policy GTW: Gypsy and Traveller Windfall Sites – Ealing LPA – local policy

Proposals for Gypsy and Traveller sites will be supported where:

~~**A. They contribute to meeting identified needs for Gypsy and Traveller pitches.**~~

**A** B. The site provides a suitable living environment for residents, access to necessary services and is compliant with relevant design guidance.

**B** C. Flooding measures are incorporated according to identified flood risk.

Ealing's identified needs for Gypsy and Traveller accommodation are set out in the relevant Gypsy and Traveller Accommodation Needs Assessment whether at borough or London Plan level. A portion of this need is met by sites allocated within the plan and other provision is expected to come forward as **in the form of windfall sites. Occupancy will be restricted to gypsies and travellers by means of planning condition.**

This policy should be read in conjunction with the rest of the local plan, and the approach to Green Belt, grey belt and MOL sites is set out in the NPPF and London Plan respectively. Relevant design

guidance has been set out by central government and may be updated or revised for use specifically in Ealing."

***Action 4.21 - Policy H16 - To consider some additional supporting text that makes reference to over concentration of similar uses as being considered on a case-by-case basis also.***

**LPA response:** The council proposes a suggested modification by adding a new sentence at the end of Para 5.25 as follows:

**"Over concentration of these uses will be considered on a case-by-case basis given the need for each scheme to justify its own demand."**

***4.22 Policy HOU and Policy H16 Paras 5.22 and 5.24  
To check whether the requirements contained in Paras 5.22 and 5.24 should be set down in policy, or whether it is already covered in policy in the London Plan.***

**LPA response:** The provisions of Para 5.22 is addressed in London Plan Policy H15 A 3 & 4. The 40% threshold is already set out in HOU E.

## **Matter 8 – Town Plans**

***Action 8.8 Policy N3 - White Hart Neighbourhood Centre -  
To provide a note on the impact upon the existing Northolt  
Neighbourhood Town Centre of the proposed new White Hart  
Neighbourhood Centre.***

**LPA response:** EB116 sets out the logic for the existing Northolt Centre and the planned new centre at the White Hart Roundabout. Both centres sit within natural 10-minute walking radii and are predominantly accessed on foot. This is particularly the case for Northolt Centre with 62% of access. Severance by the A40 is strong and the relative weakness of the existing offer at White Hart is notable by comparison with Northolt particularly in essential retail, with this reflected in the relatively lower essential retail offer. The new centre is therefore considered to be strongly complementary, with little risk of loss of trade at Northolt Centre given the poor existing pedestrian links and the natural separation between the two centres.

## **Matter 9: Development Sites**

***Action 9.5 - Ealing Sites – Proposed Use including offices - To consider the wording regarding the balance of uses for those sites in Ealing Metropolitan Town Centre that include office as a proposed use to ensure that the wording is aligned and consistent, where appropriate.***

**LPA response:** Most sites already have proposed uses that indicate clearly the relative priority of office and other uses. However, 07EA and 08EA should be modified to 'Office-led' reflect the potential for complementary uses where these do not compromise office provision.

For clarity the suggested modifications are as follows:

Amend the proposed use for 07EA – CP House as follows:

“Office-**led**”

Amend the proposed use for 08EA – Craven House as follows:

“Office-**led**”

***Action 9.19 – 08SO Middlesex Business Centre - To consider the suggested modifications proposed by the applicant in their hearing statement and provide a response.***

**LPA response:** The applicant has suggested the following modifications to the list of proposed uses for the site allocation:

*“Mixed-use scheme with residential, ~~health facility~~, hotel, flexible office/community uses and a portion of commercial/retail.”*

This is not acceptable to the council as there is no requirement for site allocations to replicate extant planning permissions. Site allocations should rather reflect a vision for placemaking, not merely mirror approved schemes. The uses proposed in the site allocation do not prevent the implementation of the extant planning permission.

The council has considered the modifications proposed by the applicant and is of the opinion that the proposed uses should remain as set out in the site allocation, with the exception that “office” be included in the list.

The applicant has requested that ‘health facility’ be removed from the proposed uses. However, the evidence from the Health Study {EB69} provides the following recommendation for Southall regarding new health infrastructure in Table 18: Health Study recommendation checklist (Page 17):

*“Proactively identify opportunities for new space for health infrastructure and health services within and around new developments in LBE, particularly in the neighbourhood areas of Acton and Southall. Where appropriate identify these opportunities through the Local Plan in policies and/or site allocations.”*

Given the level of need for health facilities in Southall, it is therefore entirely reasonable that consideration should be given to such a facility on this large site.

The council therefore proposes the following suggested modification to amend the 'Proposed Use':

"Mixed-use scheme with residential, health facility, community use and a portion of **office**/commercial/retail."

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

Yours sincerely

*Steve Barton*

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