

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
CR/034

Extension
8056

Date
25th 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 6 - Dealing with items 4.15, 7.4, 7.9, 7.10, 8.1, 8.2,
9.37 and 10.3.**

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

Matter 4 – Housing

Action Log 4.15 – General - To suggest new supporting text on an early review of the Local Plan (including how GTAA needs will be taken into account) and provide policy wording to cater for a scenario where we find that an early review is necessary.

LPA Response: Two suggested modifications are made by the council and a steer from the Inspectors would be helpful regarding their final preference.

Either:

Add new supporting text in Chapter 1 after existing Para 1.7 as follows:

"Early Review of Ealing's Local Plan

1.38 This plan has been prepared at a time of significant changes in the national and regional planning policy framework.

1.39 An entirely new version of the National Planning Policy Framework (NPPF) was published for consultation in December 2025 and is expected to be published during the

second half of 2026 and will contain a new suite of National Decision-Making Policies (NDMPs).

1.40 A new draft London Plan is also expected to be published for consultation in Summer 2026 which will set new targets on LPAs including for housing supply and gypsy and traveller pitches. The London Plan is not expected to complete its examination and thereafter be published until the end of 2027, at the earliest.

1.41 Given these important changes the council will undertake a comprehensive review of the whole Ealing Local Plan 2024-2039 by the end of 2027. This will determine whether this plan needs to be updated either in whole or in part.

1.42 All policies will be reviewed but with particular regard paid to the following matters that have been specifically identified during the preparation and examination of this plan:

- **The housing requirement for the whole LPA and consideration of proposed housing requirement set out in the new London Plan (if this has been published).**
- **Monitoring housing delivery including the progress and implementation of sites allocated in this plan to inform the Local Plan review.**
- **Gypsy Traveller and Accommodation Assessment, in accordance with the Statement of Common Ground agreed with the Old Oak and Park Royal Development Corporation (OPDC)."**

Or, in the event that this matter should be contained in a policy:

Add a new policy and supporting text at the end of Chapter 3 – Spatial Strategy after Para 3.69. The suggested policy is as follows:

"SP5: Early Review of Ealing's Local Plan

A. The council will undertake a comprehensive review of the whole Ealing Local Plan 2024-2039 by the end of 2027. This will determine whether this plan needs to be updated either in whole or in part.

B. All policies will be reviewed but with particular regard paid to the following matters that have been specifically identified during the preparation and examination of this plan:

- (i) The housing requirement for the whole LPA and consideration of proposed housing requirement set out in the new London Plan (if this has been published).**
- (ii) Monitoring of housing delivery including the progress and implementation of sites allocated in this plan to inform the Local Plan review.**
- (iii) The Gypsy Traveller and Accommodation Assessment, in accordance with the Statement of Common Ground agreed with the Old Oak and Park Royal Development Corporation (OPDC)."**

The suggested supporting text is as follows:

3.70 This plan has been prepared at a time of significant changes in the national and regional planning policy framework.

3.71 An entirely new version of the National Planning Policy Framework (NPPF) was published for consultation in December 2025 and is expected to be published during the second half of 2026 and will contain a new suite of National Decision-Making Policies (NDMPs).

3.72 A new draft London Plan is also expected to be published for consultation in Summer 2026 which will set new targets on LPAs including for housing supply and gypsy and traveller pitches. The London Plan is not expected to complete its examination and thereafter be published until the end of 2027, at the earliest.

3.73 Given these important changes the council will undertake a comprehensive review of the whole Ealing Local Plan 2024-2039 by the end of 2027. This will determine whether this plan needs to be updated either in whole or in part.

Matter 7 – Climate Change, the Environment and Healthy Places

Action Log 7.4 - Policy S5 - To consider amending the suggested modification at FSMM47 to define more clearly the reference to active design in the new paragraph after 5.47.

LPA Response: The council propose a further suggested modification to provide better clarity as follows:

Add new paragraph after 5.47:

5.48_This policy also supports the wider objective of creating active environments, and proposals should therefore be assessed against Active Design principles **including guidance produced by Sport England entitled 'Active Design – Creating Active Environments through Planning and Design' (May 2023) and/or any subsequent updates.**"

It is also proposed a web-link to this guidance be included in the plan, for ease of reference.

Please note that this amendment updates and supersedes suggested modification FSMM47.

Action Log 7.9 - SP Policies - To consider how the preamble to each of the SP policies in Chapter 3 could be clearer and more effective in DM terms.

LPA Response: The council proposes a suggested modification to amend the preamble of Policies SP2-SP4 to ensure that they are clearer and more effective as follows:

Policy SP2: Tackling the climate crisis -

SP2.1 Inclusive economy

"Development proposals should Ealing Council will promote an inclusive economy by:"

SP2.2 Climate action

"Development proposals should promote Ealing Council will take climate action by:"

SP2.3 Thriving communities

"Development proposals should Ealing Council will support thriving communities by:"

Policy SP3: Fighting inequality -

SP3.1 Tackling crime and inequality

"Development proposals should Ealing Council will tackle crime and inequality by:"

SP3.2 A fairer start

"Development proposals should Ealing Council will promote a fairer start by:"

SP3.3 Healthy lives

"Development proposals should Ealing Council will support healthy lives by:"

Policy SP4: Creating good jobs and growth -

SP4.1 Good Growth

"Development proposals should Ealing Council will promote Good Growth by:"

SP4.2 Decent living incomes

"Development proposals should Ealing Council will foster decent living incomes by:"

SP4.3 Genuinely affordable homes

"Development proposals should Ealing Council will require more genuinely affordable homes are built by:

A. **Contributing towards Meeting** the 21,570 unit 10-year housing supply target identified..."

Action Log 7.10, whole plan, To provide a note to clarify as to whether potential policy tensions have been considered, how they were addressed, and where this is evidenced.

LPA Response: Strategic tensions are inherent to local plan formation and our addressed on a series of different levels. Tensions in the Ealing's Local Plan have been mainly assessed on three different levels;

- Strategic/land supply
- Impacts/externalities
- Detailed policies

Strategic/land supply

Within London strategic land and supply targets are largely set out by the London Plan so in Ealing as in most London Local Planning Authorities supply targets are usually mediated against existing land use through a spatial options exercise. This is a process more than an output and is also shaped by Regulation 18 and Regulation 19 consultation. However, this is mainly set out in the Spatial Options report {EB106}, which sets out the borough's current character and

constraints and recommends how identified growth can be accommodated within these.

Significant additional detail added at EB107-119 which apply this framework to each of the towns in the borough. This framework is designed as much as possible to be self-reinforcing rather than conflicting, around a 20-minute neighbourhood model in which predominantly moderate density intensification clusters around transport hubs and existing town centres in a way that is both environmentally sustainable, accords with character, avoids encroachment upon protected areas, and compliments objectives such as economic and social inclusion. This also reflects the view of the NPPF that the primary roles of planning should be mutually reinforcing.

The Regulation 18 and 19 plans were drafted to implement these frameworks and its success in doing so was also iteratively assessed in relation to consultation feedback.

Impacts/externalities

Potential policy externalities are primarily assessed through the Integrated Impact Assessment {EB27-29}, which examines the impacts of individual policies to assess whether these positively or negatively affect sustainability and inclusion objectives. The assessment makes detailed recommendations of policies, and these were considered in drafting the Regulation 18 and 19 plans, where appropriate.

Detailed policies

Detailed policy assessment was included in the Integrated Impact Assessment, but further testing of the effects and potential externalities of policy were conducted through the Regulation 18 and 19 consultations, where representors were able to make clear their views of the impact of policy. This process of course continued through the examination hearings.

Matter 8 – Town Plans

Action Log 8.1 - Town Plan Policies / Chapter 4 - To review the wording of the Town Plan policies to ensure effectiveness.

LPA Response: The council proposes the following suggested modifications to amend the preamble of policies in the Town Plans (Chapter 4) ensure that they are effective. Note that the policy numbering reflects suggested modification SMM147. The proposed changes are as follows:

Acton Town Plan -

Policy ACT1: Acton Spatial Strategy

Add a new preamble as follows:

"This policy sets out a spatial vision for Acton and development proposals should positively plan to contribute towards its delivery, whereas appropriate."

Policy ACT2: Acton District Centre

Amend the preamble as follows:

"Development proposals should ~~To~~ enhance Acton's role as a District Centre by:"

Policy ACT3: South Acton

Amend the preamble as follows:

"Development proposals should ~~To~~ actively manage the transformation of South Acton by:"

Policy ACT4: Acton Main Line Station and Environs

Amend the preamble as follows:

"Development proposals should help:

A. To create a new neighbourhood centre at Acton Main Line Station..."

Policy ACT5: East Acton Neighbourhood Centre

Amend the preamble as follows:

"Development proposals should ~~To~~ enhance the role and function of East Acton Neighbourhood Centre..."

Policy ACT6: Cross-boundary working with OPDC in North Acton and Park Royal

Amend the preamble as follows:

"Ealing Council will ~~To~~ work collaboratively with the Old Oak and Park Royal Development Corporation (OPDC),..."

{NB: The title of this policy reflects suggested modification SMM43}

Ealing Town Plan -

Policy EAL1: Ealing Spatial Strategy

Add a new preamble as follows:

"This policy sets out a spatial vision for Ealing and development proposals should positively plan to contribute towards its delivery, whereas appropriate."

Policy EAL2: Ealing Metropolitan Town Centre

Add a new preamble as follows:

"This policy sets out a spatial vision for the Ealing Metropolitan Town Centre and development proposals should positively plan to contribute towards its delivery, whereas appropriate."

Policy EAL3: Northern Ealing

Northern Ealing will build upon its strong character and mixed uses by:

Amend the preamble as follows:

"Development proposals should Northern Ealing will build upon its strong character and mixed uses **of Northern Ealing** by:

Policy EAL4: Southern Ealing and Ealing Common

Amend the preamble as follows:

"Development proposals should maintain and strengthen the ~~The~~ strong local character and facilities of Southern Ealing and Ealing Common ~~will be maintained and strengthened~~ by:"

Greenford Town Plan -

Policy GRE1: Greenford Spatial Strategy

Add a new preamble as follows:

"This policy sets out a spatial vision for Greenford and development proposals should positively plan to contribute towards its delivery, whereas appropriate."

Policy GRE2: Greenford District Centre

Amend the preamble as follows:

"Development proposals should seek to ~~To~~ improve and enhance Greenford District Centre with a diversified retail offer and a wide range of community, cultural and civic assets by:"

Policy GRE3: Westway Cross Neighbourhood Centre

Add a new preamble as follows:

"Development proposals should seek:"

Policy GRE4: Sudbury Hill Neighbourhood Centre

Amend the preamble as follows:

"Development proposals should ~~To~~ enhance Sudbury Hill Neighbourhood Centre by:"

Policy GRE5: Greenford Station Local Centre

Amend the preamble as follows:

"Development proposals should ~~To~~ improve and enhance this 'gateway' location by:"

Policy GRE6: Greenford Industrial Estate

Amend the preamble as follows:

"Development proposals should ~~To~~ protect and grow the important industrial cluster at Greenford, which is focused on the designated Strategic Industrial Location, reflecting its important role in the A40 and West London logistics cluster..."

{NB: This policy wording reflects suggested modification SMM82}

Hanwell Town Plan -

Policy HAN1: Hanwell Spatial Strategy

Add a new preamble as follows:

"This policy sets out a spatial vision for Hanwell and development proposals should positively plan to contribute towards its delivery, whereas appropriate."

Policy HAN2: Hanwell District Centre

Amend the preamble as follows:

"Development proposals should ~~Hanwell District Centre will~~ maintain and enhance ~~the its~~ role of Hanwell District Centre as the local service and employment hub by:"

Northolt Town Plan -

Policy NOR1: Northolt Spatial Strategy

Add a new preamble as follows:

"This policy sets out a spatial vision for Northolt and development proposals should positively plan to contribute towards its delivery, whereas appropriate."

Policy NOR2: Northolt Neighbourhood Town Centre

Amend the preamble as follows:

"Development proposals should ~~To~~ diversify and enhance Northolt Neighbourhood Centre to create an enhanced gateway to the area by:"

Policy NOR3: White Hart Neighbourhood Centre

Amend the preamble as follows:

"Development proposals should ~~To~~ create a diverse and attractive new White Hart Neighbourhood Centre bringing together existing small shopping parades that will complement Northolt Town Centre and contribute to the regeneration of the wider area by:

Policy NOR4: Northolt Industrial Estate

Amend the preamble as follows:

"Development proposals should ~~To~~ improve and enhance the existing industrial cluster at Northolt Industrial Estate by harnessing projected growth in the industrial sector and building on existing industrial specialisms to boost wages and economic output by:"

Perivale Town Plan -

Policy PER1: Perivale Spatial Strategy

Add a new preamble as follows:

"This policy sets out a spatial vision for Perivale and development proposals should positively plan to contribute towards its delivery, whereas appropriate."

Policy PER2: Perivale Neighbourhood Centre

Add a new preamble as follows:

"Development proposals should seek:"

Policy PER3: Medway Parade Local Centre

Add a new preamble as follows:

"Development proposals should seek:"

Policy PER4: Perivale Station and Environs

Amend the preamble as follows:

"Development proposals should ~~To~~ explore the potential for a new neighbourhood centre on Horsenden Lane South and improve the active travel connectivity to and..."

Policy PER5: Perivale Industrial Estate

Add a new preamble as follows:

"Development proposals should seek:"

Southall Town Plan -

Policy SOU1: Southall Spatial Strategy

Add a new preamble as follows:

"This policy sets out a spatial vision for Southall and development proposals should positively plan to contribute towards its delivery, whereas appropriate."

Policy SOU2: Southall Major Centre

Amend the preamble as follows:

"Development proposals should To reinforce Southall's role as a Major Centre by:"

Policy SOU3: King Street Neighbourhood Centre

Amend the preamble as follows:

"Development proposals should To enhance the vitality and viability of the King Street Neighbourhood Centre by:"

Policy SOU4: West Southall

Amend the preamble as follows:

"Development proposals should To ensure effective delivery of a new neighbourhood on the Southall Green Quarter site over the plan period, ensuring that any future development includes:"

Policy SOU5: East Southall

Amend the preamble as follows:

"Development proposals should To ensure effective delivery of development of a new neighbourhood ensuring that any future development includes:"

Action Log 8.2 - Town Plan Spatial Strategy Maps A2, E2, G2, etc./ Chapter 4 - To consider how we can improve the legibility of the neighbourhood centres within the town plan spatial strategy maps.

LPA Response: The council proposes the following new suggested modification:

"For each of the Town Spatial Strategy maps including Figures A2, E2, G2, H2, N2, P2 and S2 draw a more well-defined boundary around each of the neighbourhood centres and/or improve the colour palette so that they are more prominently highlighted."

Matter 9: Development Sites

Action Log 9.37 – 03GR - 370 – 388 Oldfield Lane North - To clarify how the public realm improvements to the bridge underpass to improve the safety of passage to/from the site would be potentially delivered.

LPA Response: Footway widening and lighting improvements to the Greenford railway bridge underpass have already been completed using S106 money.

In light of the above, it is suggested that the 'Key Infrastructure Requirements' be amended as follows:

~~"Lighting and public realm improvements to the bridge underpass to improve the safety of passage to/from the site;~~ i Improvements to the Oldfield Lane North crossing and public realm including Greenford Station."

It is also suggested that the following 'Design Principle' be removed:

~~"Upgrade the bridge underpass particularly with better lighting and pavements to improve the safety for pedestrians."~~

Action Log 10.3 - Strategic Infrastructure – National Highways - To provide an update on the strategic road network assessment and on-going dialogue with National Highways.

LPA Response: Please find attached a Statement of Common Ground between Ealing Council and National Highways that was signed yesterday. This updates an earlier SoCG issued on 9th October 2025 {S22k}. Most importantly, the summary of the agreed matters notes that (my bold emphasis):

"Both parties agree that they have a positive working relationship regarding the Ealing Local Plan. Both agree to continue to work together collaboratively to resolve strategic matters relating to the SRN."

Both parties welcome and encourage the use of active travel and will be supportive of any policies which may off-set car journeys that could otherwise travel on the SRN."

LB Ealing has provided National Highways with a quantified assessment of the Local Plan impact on the SRN. National Highway have reviewed the document, dated December 2025, outlining the Impact Assessment for the SRN, and have concluded that the additional Local Plan related traffic could be adequately accommodated within the existing network, including both the morning and evening peak hours."

National Highways are content that the Local Plan should not pose any safety or operational concerns for the SRN."

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

Yours sincerely

Steve Barton

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