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c/o Paige Gaughan,
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Ealing LPA

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Your ref	My ref	Extension	Date
	CR/037	8056	19th March 2026

Dear Sir/Madam,

**Examination of the Ealing Local Plan 2024-2039:
Ealing LPA's Response to Post Hearing Action Logs,
Block 2, Part 9 - Dealing with items 4.23, 4.24, 7.1, 7.2, 7.3, 7.4,
7.6, 7.7, 8.3 and 9.30.**

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

Matter 4 – Housing

Action Log 4.23 - Policy H16/HOU - To provide on a note on consistency of approach between Policy H16 and HOU particularly relating to affordability and Policy H16 b (iii) Ealing Local Variation and London Plan Policy H16 A 2).

LPA Response: With regards to PBSL, Policy HOU seeks provision of on-site C3 affordable housing in place of a payment in lieu (as required by Policy H16 A (9) of the London Plan). While the London Plan approach secures funding for C3 affordable housing, it does not deliver physical units and leaves the council with an issue of having to fund sites to develop which is problematic in a borough which has limited land availability. It is therefore preferable for developers of PBSL to deliver on-site C3 affordable housing units on their sites, rather than externalising responsibility for delivery to the council. This is an approach that has been adopted by other London boroughs for similar forms of housing, including purpose-built student accommodation.

The council's emerging policy approach has a broadly neutral impact on viability in comparison to the London Plan Policy H16 requirement for a payment in lieu. Furthermore, there are some cashflow benefits to on-site provision of C3 affordable housing, as registered providers will typically pay the agreed purchase price during the construction period

(which reduces the developer's finance costs) whereas the payment in lieu has the opposite impact (developers will need to borrow more funds to pay this to the council).

London Plan H16 2 A relates to the composition of the housing provision within purpose-built student accommodation which is distinct from the potential impact of any given scheme on its specific area discussed in Local Plan H16 B (iii). Similarly, overconcentration arising from the developments of several schemes discussed at (ii) is distinct from the need to secure for student use any student accommodation that does not result in these adverse effects. The difference is effectively between management of the scheme itself versus assessment of whether a scheme is suitable to its context.

Action Log 4.24 – Policy SSC - To provide a note on:

a) the principle of the levy;

b) the viability evidence that informs the thresholds and tenure mix;

c) mechanisms for implementation including how the sum would be calculated and why using. real construction cost and sales value is preferred by the Council in light of the concerns raised by a participant in the session about clarity of approach and potential for delays at the pre- construction phase; and,

d) whether any other LPAs have brought forward a similar policy approach.

LPA Response:

(a) A significant proportion of development in the Borough is of small schemes below the 10-unit threshold at which Policy HOU seeks onsite affordable housing provision. In common with other London boroughs, the council's emerging Policy SSC seeks a financial contribution towards affordable housing from schemes of between 1 to 4 dwellings (a contribution equivalent to 10% of units) and 5 to 9 units (a contribution equivalent to 20% of units). While the full policy target as set out in Policy HOU is 40% affordable housing, the 10% and 20% target provision as a payment in lieu is set at a level that should be viable for almost all schemes and reduce the need for viability testing at the development management stage.

This approach of applying a reduced target is not universally applied across the capital, with some boroughs (such as Richmond) seeking a financial contribution equivalent to the full 35% in their policy target, while others (such as Westminster) have adopted an approach which is similar to Ealing's proposed approach (Westminster also applies a financial contribution which is equivalent to 20% affordable housing).

The overriding principle is that the financial contribution is set at a level which leaves developers no worse off (and no better off) in comparison to provision of affordable housing on-site. In other words, the financial contribution is financially neutral in comparison to on-site delivery.

(b) EB120 tests the viability of schemes below 10 units through typologies 1 to 5 (which comprise one house, two houses, four houses, seven flats and nine flats).

The appraisal outputs in Appendix 7 of EB120 show that in almost all testing scenarios, schemes can viably provide the equivalent onsite affordable housing required by Policy SSC. The only exception is Site typology 1 tested on BLV 1 at the lowest end of the sales value range. This typology still generates sufficient residual land to be within 10% of the target BLV.

(c) The details of the mechanics for implementation are discussed in EB120 (paras 6.17 to 6.21). The council will set out the detail in a Planning Obligations SPD and/or Local Planning Policy Guidance in due course, but this is likely to follow the formula set out at Paragraph 6.20 of EB120. This is a simple approach that is widely used by local authorities and does not require detailed viability information.

The payment in lieu would be calculated prior to determination of planning applications so that the agreed amount can be incorporated into the Section 106 agreement.

(d) As noted previously, other London boroughs seek payments in lieu of on-site affordable housing provision and use various methods of calculating the amounts due. LB Brent and LB Islington operate fixed tariff approaches which seek an amount per unit delivered in the scheme. Merton, Richmond and Hackney adopt a formula-based approach, as outlined at Para 6.20 of EB120.

Matter 7 – Climate Change, The Environment and Healthy Places

Action Log 7.1 - Policy G4 - To consider the wording of the policy and supporting text to improve clarity particularly around visual openness and address conflict between c (i) and (ii).

LPA Response: Clause B of the parent London Plan Policy G4 establishes that development proposals should not result in the loss of protected open space. Through the operation of this and similar earlier policies it is widely accepted that this is not intended to rule out all forms of development, recognising that in order for the space to fulfil its functional purpose / potential, some ancillary facilities may be necessary and essential in open space.

Ealing's local variation policy (Clause C) seeks to define qualifying features and circumstances which must be demonstrated if development proposals are to be supported on open space in Ealing. This includes the requirement to demonstrate that the development proposal supports the purposes of nature conservation, recreation, outdoor leisure and sports and climate change mitigation. This is intended to limit built development or engineering works to activities which directly support the intended open function / objective of a given open space. Whilst a use and associated built development may be considered to be compatible in principle and thus qualify with the first sentence of c(i), the acceptability of such development remains contingent on demonstrating that the scale and siting of that development is managed to minimise the impact on visual openness and thus avoiding any conflict with the purposes. Structured as a single paragraph both sentences in 'C (i)' are to be read cumulatively, and both must be satisfied.

Clause C (ii) further reinforces the need for development proposals to preserve and enhance visual openness as introduced through c(i), and defines how visual openness should be judged, having regard to views to, from, within and across the open space.

This clause compliments Clause C (i). Both clauses must be satisfied.

The emphasis placed on visual openness in this policy does not preclude consideration of other factors which may be relevant when judging impact on openness, i.e. functional potential/use, auditory experience and definitional harm. It is not the intention of this policy to exhaustively address all such considerations, many of which are already addressed through other national and regional policies. With regard to the later it is important to note that this policy will continue to operate alongside a suite of other policies in the London Plan which address specific designations, including Policies G2 (Green Belt), G3 (Metropolitan Open Land), G6 (Sites of Importance for Nature Conservation), SI 14 & SI 16 (Blue Ribbon Network), and that the implementation of these policies are unaffected by local variation Policy G4.

The council proposes a suggested modification to include new supporting text is proposed after Paragraph 5.36 as follows:

"The loss of protected open space is resisted as per the parent policy in the London Plan. Where development proposals are advanced on open space it is essential that these are tied to specific open space purposes and the function of a given site, and that the scale and siting of that development is managed to minimise the impact on visual openness and thus avoiding any conflict with the purposes."

The siting, positioning and scale of any built development on open space can change the sense of openness, including the impression of how expansive the open space is, its relationship with the wider open space network and the relationship with neighbouring built development. The introduction of buildings and engineering works may disrupt views looking into, out of and across a site, and this should be managed. Considering visual impact in respect of views from various positions and perspectives is important when judging the impact of any built development on openness, and this clause seeks to bring this consideration to the attention of the applicant and decision maker.

Assessing visual impact does not preclude consideration of other factors which are relevant when judging impact on openness, i.e. functional potential / use, auditory experience and definitional harm. Such matters are addressed through other regional and national policy including London Plan Policies G2 (Green Belt), G3 (Metropolitan Open Land), G6 (Sites of Importance for Nature Conservation), SI 14 & SI 16 (Blue Ribbon Network), and the implementation of these policies continue to operate alongside local variation Policy G4."

Action Log 7.2 - Policy G5 - To provide evidence to support the interim London Plan target as the local plan target and provide a note on the implications of that policy being found unsound if it is not justified, in terms of general conformity with the London Plan.

LPA Response: London Plan Policy G5 requires the inclusion of urban greening measures in new major development to increase green cover. Clause B of this policy advises that 'Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2 of London Plan policy G5 but tailored to local circumstances. In effect the policy expects boroughs to establish Urban Green Factor target scores but recommends target scores to be used in the interim, which the council has applied effectively since 2021.

The GLA have also published guidance (2023) to support the operation of the policy and the establishment of local UGF targets and a tailored approach. The guidance highlights the role of individual borough Green Infrastructure (GI) strategies in gathering the evidence to support target setting. Pending the preparation of a revised GI Strategy the council do not presently have the evidence to support the introduction of different targets or any other variation in the application of the process. For this reason, the council have sought to move forward on

the basis of the established 'interim' target scores and factor values, and local variation policy G5 confirms this intention.

The factor values and interim targets established in the London Plan policy were informed by evidence prepared to support the London Plan and with the engagement of the boroughs including Ealing. The 'Urban Greening Factor for London' report (2017) comprises the core evidence underpinning the recommended targets. See: [Case Studies \(https://www.london.gov.uk/sites/default/files/urban_greening_factor_for_london_final_report.pdf\)](https://www.london.gov.uk/sites/default/files/urban_greening_factor_for_london_final_report.pdf). The project examples examined as part of this study indicated that an overall minimum score of 0.3 will be suitable for most proposed developments on previously developed land in London but recognised the justification for setting higher minimum targets for predominately residential developments. The case studies tested covered both inner and outer London schemes and is applicable to an Ealing context. The council has applied the interim standards since 2021 without any issues of note. As noted already Ealing presently have no better local evidence to depart from the interim targets.

The GLA's guidance provides some clarity around the status of the interim standards in the absence of any local target in a Local Plan. Paragraph 1.1.2 advises that 'Where Local Plans do not have UGF scores, the London Plan UGF scores of 0.4 for predominately residential developments and 0.3 for predominately commercial developments should be applied.' Whilst this text was principally aimed at clarifying the position pending the preparation of new Local Plans following the introduction of the policy, where Local Plans remain silent on this matter, based on the text in the guidance here it seems reasonable to assume that the interim targets would still stand.

Whilst ordinarily the council's preferred approach would be to avoid repeating the provisions of London Plan policies where this is not needed, because of the way the parent policy is worded (as an instruction), this suggests that the council should be more active in outlining its position. For the sake of clarity and the avoidance of doubt, the council's preference is to restate the interim targets through a local variation policy.

Action Log 7.3 - Policy S5 - To consider whether the scope of development needs to be defined more clearly and whether the content of Para 5.46 either be included in the policy or the supporting text should be amended instead.

LPA Response: Clause E advises that: 'Development should ensure sufficient quality of sports provision in line with Ealing's Sports Facilities Strategy.' This is intended to respond to the need / demand arising from new developments (principally residential), and to manage the impact of development on existing provision (whether this take the form of encroachment resulting in the direct loss of facilities, or indirectly where the sports use is compromised) in order to maintain an appropriate

level of provision throughout the borough. Development in this context then should be taken to include all forms of development both 'residential' and 'non-residential' uses. Since the scope is relevant to both, we would seek to avoid making any such distinction in the policy text itself.

To provide further clarity regarding to the intended scope of the policy in respect managing loss and new provision, including defining which 'developments' trigger this policy, additional supporting text is recommended. A new paragraph after Paragraph 5.45 is proposed which attempts to define loss in the context of maintaining a sufficient quality of sports provision. Further revisions are also proposed in respect of original Paragraph 5.46 including additional text aimed at clarifying the approach taken to managing and capturing need arising from new development.

The council proposes the following suggested modifications:

Add a new paragraph in supporting text after Para 5.45 as follows:

"Maintaining sufficient quality of provision is contingent on managing the loss of existing facilities and provision. This loss may be direct through the introduction of alternative uses or buildings on a site. Loss may also occur indirectly where the operation of the sporting provision is compromised through the introduction of neighbouring activities."

Revise supporting text at Paragraphs 5.46 and 5.47 which are expanded, renumbered and incorporate the relevant earlier recommended revision at FSMM47 as follows:

"New development comprising the creation of one or more residential units should satisfy its needs and contribute towards achieving the quality of provision as envisaged through Ealing's Sports Facility Strategy. It should be noted that pitch carrying capacity has a direct relationship with pitch quality. On-site provision will not normally be sought in developments of less than 300 residential units but must in all cases form the best type of provision based upon ~~current needs~~ an understanding of need (existing and future) as established within the Sports Facilities Strategy and any future updates. The latest version of the Sport England's Playing Pitch Calculator tool should be used to scope the appropriate scale and approximate costs of new on-site playing pitch provision and to provide the starting point for project specific negotiations of S106 contributions, where on-site provision is not sought."

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: Arising from the Statement of Common Ground with Sport England, a number of modifications were agreed which have sought to embed Active Design Principles into the Local Plan at multiple points, including at Paragraphs 3.20 (SMM15) and 3.44 (SMM25) as part of the spatial strategy in Chapter 3, and 5.7 (SMM129) in respect of the design Policy DAA and finally in a proposed new paragraph at 5.48 (FSMM47) under Policy S5.

The concept of Active Design derives from work undertaken by Sport England, Active Travel England and the Office for Health Improvement and Disparities, who have jointly prepared guidance to assist with the planning of new developments with the aim of creating an environment where people can be more active.

New Paragraph 5.48 recognises the important role of Policy S5 in supporting the creation of active environments and seeks to ensure that new developments are assessed against the ten Active Design Principles as outlined in the latest iteration of the Active Design Guidance (May 2023). To provide clarity around the source of Active Design Principles it is considered helpful to include direct reference to the guidance published by Sport England.

A further suggested modification is proposed to new Paragraph 5.48 which is intended to supersede the suggested modification proposed at FSMM47 as follows:

"This policy also supports the wider objectives of creating active environments, and proposals should therefore be assessed against the Active Design principles **detailed in the Sport England Active Design Guidance (May 2023) and supporting material, and any subsequent updates.**"

Please be aware this provides additional comments and a minor amendment to the suggested modification previously proposed in the council's response to Block 2 Action Logs (Part 6) dated 25th February 2026.

Action Log 7.6 - Policy OEP - To consider an amendment to the supporting text to include a reference to providing guidance regarding energy use intensity (EUI) tariffs.

LPA Response: It is recognised that the policy and supporting text does not specify an energy offset price. This is intentional and reflects the position established currently with regard to the carbon offset price as addressed via the London Plan. Paragraph 9.2.8 of the London Plan advises that the price for offsetting carbon is regularly reviewed, and

that changes to the GLA's suggested carbon offset price will be updated in future guidance. A footnote references the nationally recognised non-traded price which Ealing applies currently and advises that Boroughs should develop their own price. The Mayor's Sustainable Design and Construction SPG which originally specified an earlier price, also recognised that the price could be set outside of the development plan.

Paragraph 5.55 of the supporting text of local policy OEP explains the relationship between offsetting and the requirement to achieve an energy balance as per the policy. The offset is determined based on the gap between the required (to match the EUI) and actual energy generation on site. This approach to offsetting follows the recommendations set out in the Delivery Net Zero Study {EB34}.

Having minimised the energy demand, the policy requires schemes to deploy renewable energy technologies on the site which are sized to meet or exceed the minimised predicted EUI on site – which is described as achieving an energy balance. Whilst the target levels have been set to ensure that the EUI should typically be small enough to be capable of being matched through renewable energy generated on-site, the policy should build in some flexibility recognising that practical factors in limited circumstances may make it impossible to reach an energy balance on-site.

Where it is proven that an energy balance cannot be achieved on-site, applicants are required to establish the shortfall in renewable energy generation needed to meet the predicted EUI and pay a contribution equivalent to the cost of generating energy off-site through renewables. Specifically, the policy should allow for a higher level of off-setting where there are clear practical challenges preventing the achievement of an energy balance on-site.

Once officers are satisfied that the building complies with these policy requirements, energy offsetting can be used to deal with the residual difference between energy use and renewable energy generation.

Given the shift in metrics away from carbon to energy and noting that the offset mechanism is designed as a renewable energy offset, it is necessary to use energy-based offsetting instead expressed as £/kWh. instead of £/tCO₂. This will also make the process independent from carbon factor changes.

The study {EB34} goes on to examine how an offset price might be established and outlines a number of key principles in this regard. It recommended that the offset price should not be less than the cost involved in achieving an energy balance on-site, to discourage incentivising offsetting over on-site measures. The price should be set at a level which enables authorities to save energy elsewhere on a 1:1 basis and administer the offset fund. It also recommended that the offset price should be set based on the cost of installing PVs on a

building. Following these principles the study included provisional costings, based on the following workings. Using a reasonable cost rate for a high output PV system with micro-inverters (i.e. £1,016/kWp) and applying a 10% additional rate for administering and managing the PV funding process, would give an energy offset price of £1.32/kWh/yr.

As noted, these costings are provisional and are outlined here to demonstrate the work which has already taken place with respect to developing a price. As explained above the council's preference is to avoid setting a price through the Local Plan itself, as we believe that it would be better to set this price outside of the plan itself, where it can be reviewed regularly. We propose therefore to publish the energy offset price within the council's Authorities Monitoring Report. To clarify this intent additional text is suggested at end of Paragraph 5.55 as follows.

"Where an Energy Balance is not achieved, applicants should establish the shortfall in renewable energy generation to enable the annual renewable energy generation to match the Energy Use Intensity in kWh. The applicant should pay into the council's offset fund a sum of money equivalent to this shortfall. **The energy offset price will be set at a level which enables Ealing to save energy on a 1:1 basis and to administer the offset fund. This will be expressed as a £ per kWh/yr. The council will publish this price within its Authority Monitoring Reports.**"

Action 7.7 (Policy ECP): To clarify the scope of major developments and other residential uses and non-residential uses in the supporting text.

LPA Response: The concept of 'major development' is well established already, through legislation, the NPPF and the London Plan. Numerous policies throughout the Local Plan, including Policy ECP, set a threshold for their application based on a 'major development' status. Whilst 'major development' is defined elsewhere, and the council does not wish to depart from such definitions, it is recognised that it would be helpful to also include such a definition within Ealing's Local Plan documents. Rather than attempting to define this locally through each individual policy, which would be unnecessarily repetitive, we propose to include a single definition of 'Major Development' within the council's Local Plan Glossary at Appendix 2. For the sake of consistency, we recommend that this mirrors the definition included in the London Plan currently.

The council therefore proposes a suggested modification as follows:

Add a new entry to the Glossary as follows:

"Major development - For a full definition, see Part 1 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. Generally, major developments are:

- **Development of dwellings where 10 or more dwellings are to be provided, or the site area is 0.5 hectares or more;**
- **Development of other uses, where the floor space is 1,000 square metres or more, or the site area is 1 hectare or more."**

Regarding the scope of the policy in respect of uses listed in Table DMP4 this reflects the evidence base underpinning the original LETI work, which tested the key development uses / types listed in the table. Moreover, this evidence has also informed the benchmark targets outlined in the GLA's Whole Life Cycle Carbon Assessment Guidance which utilises the same grouping of uses as mirrored through table DMP4.

Whilst the coverage is broad it is recognised that this does not cover all planning uses. To remedy any potential gaps in coverage, the text advises that applicants should apply the carbon limits associated with the nearest equivalent building type. The same approach is currently recommended in respect of the Benchmarks within the GLA's guidance. The decision maker will therefore be able to use discretion when applying the building types listed, where a proposed scheme does not quite fit the target groups specified. To further clarify this position, the council proposes a suggested modification as follows:

Add new paragraph in supporting text after Paragraph 5.58 as follows:

"Table DMP4 sets embodied carbon limits for common development uses / types, reflecting the archetypes tested as part of the evidence base. Where proposals do not fit within the defined target group, applicants should use the nearest equivalent use(s) to their proposal use(s) when determining which carbon limit to apply. The residential targets are intended to apply to conventional and non-conventional forms of residential accommodation proposed as part of major development schemes."

Please note that this is in addition to the suggested modification proposed at FSMM49.

Action 7.8 (Policy SI 7): To consider whether the policy text should be amended to ensure consistency with Paragraph 561 of the supporting text.

The intention of the policy is to require applicants to prepare and submit a Circular Economy Statement alongside any major development

proposals. Currently the use of the word 'should' in the policy text introduces an element of discretion which contrasts with the supporting text which is clear that this functions as a requirement. To remedy this position, it is recommended that the policy text is amended as follows:

Amend Policy SI 7 D as follows:

"Major development proposals ~~should~~ **must** be supported by a circular economy statement, which demonstrates how the proposal achieves circular economy outcomes in accordance with Part C of London Plan (2021) Policy SI 7."

Matter 8 – Town Plans

Action Log 8.3 - Town Plan Spatial Strategy A1, E1, G1, etc /Chapter 4 -To consider how to better communicate the scale/quantity of growth anticipated within each town.

LPA Response: The council has considered how to incorporate the quantity of growth anticipated for each of the seven towns and proposes suggested modifications in supporting text for each individual town plans as detailed below:

Acton:

Amend Paragraph 4.1.24 as follows:

"It also seeks to capitalise on the future delivery of the West London Orbital initiative and improved connections at Acton Central and South Acton overground stations. In line with the Strategic Place interventions of the Local Plan, significant levels of development will take place in Acton due to the presence of the Elizabeth line at Acton Mainline Station and proposed West London Orbital station at Acton Town. **An analysis of the spatial distribution of housing capacity for Acton indicates a net capacity of 7988 units (as at March 2026). This figure reflects a broad estimate of total net housing capacity for both allocated and unallocated sites in Acton.**"

Ealing:

Amend Paragraph 4.2.24 as follows:

"An analysis of the spatial distribution of housing capacity for Ealing indicates a net capacity of 6519 units (as at March 2026). This figure reflects a broad estimate of total net housing capacity for both allocated and unallocated sites in Ealing. New development must respond positively to Ealing's character and seek to enhance its identity. Development will need to respond sensitively having regard to the growth and

intensification themes and associated tall buildings guidance/indicative heights identified in each local character sub-areas. This is further set out in the Ealing Character Study. Ealing is one of the most diverse character areas in the Borough with some of the longest history of settlement and building. The town centre itself contains elements of almost all of the character types present including all forms of town centre typology, and most types of residential development. Ealing town also has notable representation from spacious urban villas and open space typologies, which due to their more extensive form take up around half of the total area. The area is home to several conservation areas recognising their special character and historic interest and the recent review has highlighted the opportunity to add to these with a new Northfields CA."

Greenford

Amend Paragraph 4.3.33 as follows:

"An analysis of the spatial distribution of housing capacity for Greenford indicates a net capacity of 4130 units (as at March 2026). This figure reflects a broad estimate of total net housing capacity for both allocated and unallocated sites in Greenford. New development must respond positively to Greenford's character and seek to enhance its identity. Greenford is characterised by distinct typologies that reflect periods of its development and growth including inter-war suburban and industrial expansion. The residential parts have a suburban character, with a mix of suburban semi-detached and suburban terraces comprising over half its typological mix. Development will need to respond sensitively having regard to the growth and intensification themes and associated tall buildings guidance/indicative heights identified in each local character sub-area. This is further set out in the Ealing Character Study."

Hanwell:

Amend Paragraph 4.4.27 as follows:

"Growth in Hanwell will be led by its context and will occur mainly in and around Hanwell District Centre to capitalise on public transport accessibility levels delivered by proximity to Hanwell Station. **An analysis of the spatial distribution of housing capacity for Hanwell indicates a net capacity of 2258 units (as at March 2026). This figure reflects a broad estimate of total net housing capacity for both allocated and unallocated sites in Hanwell.**"

Northolt:

Amend Paragraph 4.5.28 as follows:

"An analysis of the spatial distribution of housing capacity for Northolt indicates a net capacity of 2138 units (as at March 2026). This figure reflects a broad estimate of total net housing capacity for both allocated and unallocated sites in Northolt. New development must respond positively to Northolt's character and identity and seek to enhance it. Northolt has a varied character that reflect periods of development and growth, from its historic village through to twentieth century suburban and industrial expansion."

Perivale:

Amend Paragraph 4.6.23 as follows:

"An analysis of the spatial distribution of housing capacity for Perivale indicates a net capacity of 2138 units (as at March 2026). This figure reflects a broad estimate of total net housing capacity for both allocated and unallocated sites in Perivale. New development must respond positively to Perivale's character and identity and seek to enhance it. Perivale has a well-defined urban structure with several typologies present that reflect periods of its development and growth, including a fine-grained historic industrial core and inter-war suburban semi-detached and suburban terraced housing development. Development will need to respond sensitively, having regard to the growth and intensification themes and associated tall buildings guidance/indicative heights identified in each local character sub-area. This is further set out in the Ealing Character Study."

Southall:

Amend Paragraph 4.7.23 as follows:

"Southall is experiencing the highest population growth in the borough and will require additional housing provision to meet its future needs. **An analysis of the spatial distribution of housing capacity for Southall indicates a net capacity of 12455 units (as at March 2026). This figure reflects a broad estimate of total net housing capacity for both allocated and unallocated sites in Southall.** Southall ~~It~~ also suffers from high levels of deprivation and poverty. Access to genuinely affordable housing will be critical to addressing local needs."

Matter 9: Development Sites

Action Log 9.30 - 04NO Northolt Driving Range - To produce a Heritage Impact Assessment for 04NO and a note confirming whether or not it raises any further implications for the Plan. The council should consult with Historic England on the HIA/note.

LPA Response: A Heritage Impact Assessment (HIA) for 04NO Northolt Driving Range has been produced in consultation with Historic England and is attached.

In light of the HIA and the conclusions regarding any potential impacts on the significance of the Church of St Mary, Northolt Manor Scheduled Monument and Northolt Village Green Conservation Area from any development on Northolt Driving Range, the council suggests the following amendments be made to 04NO Northolt Driving Range:

Amend 'Planning designations/site constraints' as follows:

"Site Constraints: Flood Zone 3a (surface water), Northolt Village **Green** CA (adjacent), **Grade I St Mary's Church (nearby), Northolt Manor Scheduled Monument (nearby),** SINC (metropolitan), Green Corridor, SINC (borough) (nearby), LSIS."

Amend the first 'Contextual Consideration' as follows:

"Site is adjacent to Belvue Park and within the setting of St Mary's Church **(Grade I), Northolt Village Green Conservation Area and Northolt Manor Scheduled Monument.** ~~and visual impact will need to be carefully considered, both on the historic interest of the asset~~ **Development should conserve, and where appropriate, enhance the significance of these heritage assets** and the visual openness of the greenspace **Belvue Park.**"

Amend the fifth 'Design Principle' as follows:

~~"Ensure that h~~ **Heights, scale, layout** and massing ~~is considered in relation to~~ **should respond to the sensitivities of the site and not detract from the significance of nearby heritage assets and any contribution made by their settings, including key** views to and from the St Mary's Church and **Northolt Manor Scheduled Monument. Development should also protect the visual openness of** Belvue Park."

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

Yours sincerely

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