



Mr S Barton,
London Borough of Ealing
By email

Our Ref:
Date:

PINS/ A5270/429/9
14 May 2026

Dear Mr Barton,

Examination of the Ealing Local Plan 2024-2039 (the Plan)

1. We are writing further to the Council's response to the relevant actions agreed during the Block 2 Hearings¹. The purpose is to set out our interim findings on specific issues in the interests of giving the Council an opportunity to comment ahead of finalising our position on the Main Modifications needed for soundness. We have already written separately on the matter of tall buildings.

Policy G5 (Urban Greening)

2. The Council proposes to meet the requirement in Policy G5(B) of the London Plan for an Urban Greening Factor tailored to local circumstances by replicating the interim target levels in the London Plan. During the hearing session, the Council indicated that the interim targets have been successfully achieved. However, a specific and adequate evidence base has not been prepared to support or justify that position. As a result, our view is that Policy G5 is neither justified nor in general conformity with the London Plan in respect of adopting an Urban Greening Factor that is tailored to local circumstances.
3. Paying regard to the stage we are at in the examination and the pauses agreed so far, allowing further time for the preparation of locally derived evidence by the Council and then for it to be properly considered would not meet the Government's aim of getting plans in place without delay. In these circumstances, the pragmatic approach for addressing these soundness issues would be a modification removing the proposed local variation to Policy G5 from the Plan.

¹ https://www.ealing.gov.uk/downloads/download/8775/council_response_to_action_logs_block_2_part_4

Policy ENA (Enabling Development)

4. Policy ENA intends to address a locally perceived gap in clear guidance on enabling development by establishing some principles in development plan policy for how such applications will be treated. It is not justified by any specific evidence and we are also concerned that, despite the Council's suggestion that it is intended to have a specific and limited purpose, the scope and effects of the policy (including any unintended consequences) are not adequately understood and evidenced. In addition, while we appreciate the Council have attempted to improve the clarity of the policy through suggested modifications, we remain concerned that it lacks clarity.
5. For these reasons, our view is that Policy ENA is unjustified and ineffective. Our suggested modification for addressing these soundness issues is the removal of Policy ENA from the Plan. We appreciate that this may have a knock on effect for specific Development Sites and that the Council may wish to review any that are potentially affected. We would appreciate the Council's comments on this matter and whether, in their view, they would suggest any consequential modifications to reflect Policy ENA being removed from the Plan (which would, of course, need to be justified).

Development Sites

02GR (Greenford Broadway Car Park)

6. A boundary change has been proposed through a Statement of Common Ground with the landowner to include the neighbouring Tesco supermarket site within the proposed Development Site boundary. This change would increase the size and capacity of site 02GR.
7. There is no evidence that the deliverability of the Development Site is dependent upon this change. Furthermore, it has been introduced at a later stage in the plan making process and was not part of the Plan which was consulted upon prior to submission. It is our view that inclusion of this land is not justified or otherwise necessary for soundness. As such, we do not agree that modification is needed in this respect.
8. We appreciate that this will result in a revision to the latest housing trajectory submitted by the Council. Although, we expect that this would not have implications for the 5 year housing land supply position as currently calculated. We would be grateful for the Council's confirmation on this point.

Other proposed Main Modifications

9. Overall, the proposed boundary corrections seek to ensure that land in the Green Belt and Metropolitan Open Land has correct, up to date, consistent, and defensible boundaries. Although the Plan refers to the boundary corrections through the Atlas for Change, that document does not form part of it.

10. Consequently, the Plan is not effective as it lacks the necessary clarity on the extent of changes that have been made through the plan making process. As the Plan would also benefit from the same level of clarity in respect of changes to industrial site boundaries and designations, our view is that the easiest way to address these soundness issues is to include the Atlas for Change as a new Appendix to the Plan through Main Modification.

11. Similarly, for the Plan to be effective, the final housing trajectory summary should also be included in a new Appendix to the Plan by Main Modification.

Request for clarification

12. In respect of FSMM62 can the Council clarify whether the term “gross” is intended to refer to gross site capacities (i.e. before any existing demolished residential units are netted off) or whether it is a term intended to indicate a ceiling of maximum site capacities?

Next steps

13. We would be grateful for the Council’s comments, which we will take into account as we reach our final conclusions.

14. We are not inviting comments from other parties at present, as any modifications that we formally conclude are necessary for soundness will be consulted upon in due course.

Darren McCreery and Carole Dillon

INSPECTORS