



Ealing New Local Plan

Regulation 19

Local Groups Briefing and Discussion

11 March 2024

AGENDA

1. Welcome
2. Ealing's new Local Plan - the Regulation 19 Edition
 - What does it say?
 - What's changed since Regulation 18?
3. Briefing on the consultation and methods of responding
 - Timing
 - Differences between this and the Reg 18 consultation
 - Recommended response methods
4. Community engagement meetings with Ealing Council
 - Overview of meetings to date
 - Whether and how to continue
5. AOB



The Government approach to Planning

- A presumption in favour of sustainable development
- Sustainable development has 3 Pillars
 - Economic
 - Social
 - Environmental
- Our planning system is 'plan-led'
- It requires succinct and up-to-date plans to provide:
 - a vision for the future
 - a framework for meeting housing needs and other economic, social and environmental priorities;
 - a platform for local people to shape their surroundings.

The NPPF lays out the rules that govern local plan-making

- The development plan must include strategic policies for the development and use of land
- Strategic policies should provide for objectively assessed needs for housing and other uses, unless:
 - i. They seriously affect policies that protecting areas or assets of particular importance or
 - ii. The adverse impacts demonstrably outweigh the benefits,
- Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for
 - **housing** (including affordable housing), employment, **retail**, **leisure** and other commercial development
 - **infrastructure** for transport, telecommunications, security, waste management, water supply, wastewater
 - **community facilities** (eg health, education and cultural infrastructure)
 - **conservation and enhancement** of the **natural**, **built** and **historic environment**, including landscapes and **green infrastructure**, and measures to address climate change.

the NPPF continues ...

- Strategic policies should provide a **clear strategy** for bringing sufficient land forward, sufficient to address **objectively assessed needs*** over the plan period
- Policies should be underpinned by relevant evidence. This should focus tightly on supporting and justifying the policies, and take account of **relevant market signals**.
- Plans must be reviewed every 5 years

* In Ealing the Local Housing Needs Assessment Nov 2022

NPPF criteria for evaluating a Local Plan

Has the Local Plan been prepared in accordance with legal and procedural requirements?
Is it 'sound'? Plans are 'sound' if they are:

<p>Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p>	<p>Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p>
<p>Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p>	<p>Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy where relevant.</p>

Ealing's Reg 19 Documents

- Last stop before the Inspector. Too late for LBE to change
- At 516 pages it's huge. Even with a 'wayfinding guide' its hard to navigate
- Full of jargon and gobbledegook
- Changes from Reg 18 version are hard to spot,
 - Some are widely welcome – eg MOL and Green Belt
 - Others raise new concerns
- Some policies only explained in the evidence base - now 60 files

[Index to](#)

Camden's topic based plan

- Introduction
- Growth and spatial strategy
- Meeting Housing Needs
- Community, health and wellbeing
- Economy and jobs
- Protecting amenity
- Design and Heritage
- Sustainability and climate change
- Town centres and shops
- Transport

It is a brand new plan.

- Local Plan's are supposed to be reviewed every 5 years
- What happened to the 2012 plan
- What worked. What didn't?
 - It has never been reviewed
 - No Required Monitoring reports
- What about SPDs like Southall OAPF



Ealing Matters's 14 Issues at Reg 18

- How the consultation was done.
- Housing.
- Capacity for growth.
- Infrastructure.
- Climate change.
- The Natural Environment.
- Green and Open Space Policies. .
- Waterways
- Place design, form, character.
- Heritage.
- Tall Buildings.
- Town Centres.
- Master planning and Area Action plans.
- Plan monitoring and reporting.

Reg 18 v Reg 19 what has changed?

• Chapter 3 Spatial Strategy

(full description in Chapter 1 page 12)

- Climate change policies
- Abandoning Green Belt and many MOL dedesignations
- Gypsy and traveller pitches at Sharvel Lane
- List of infrastructure projects

• Chapter 4 Town Plans and sites

(full description in Chapter 1 page 12)

- Rewording of town spatial strategy policies
- List of infrastructure projects for each town
- Ealing Metropolitan Town Centre strategy
- Development site proposals
 - Reduced from 118 to 78 – some as they have been consented
 - 4 new sites added
 - Boundaries of 22 have changed
 - Additional detail added, including appropriateness of tall buildings

Reg 18 v Reg 19 what has changed?

- Chapter 5 Development Management

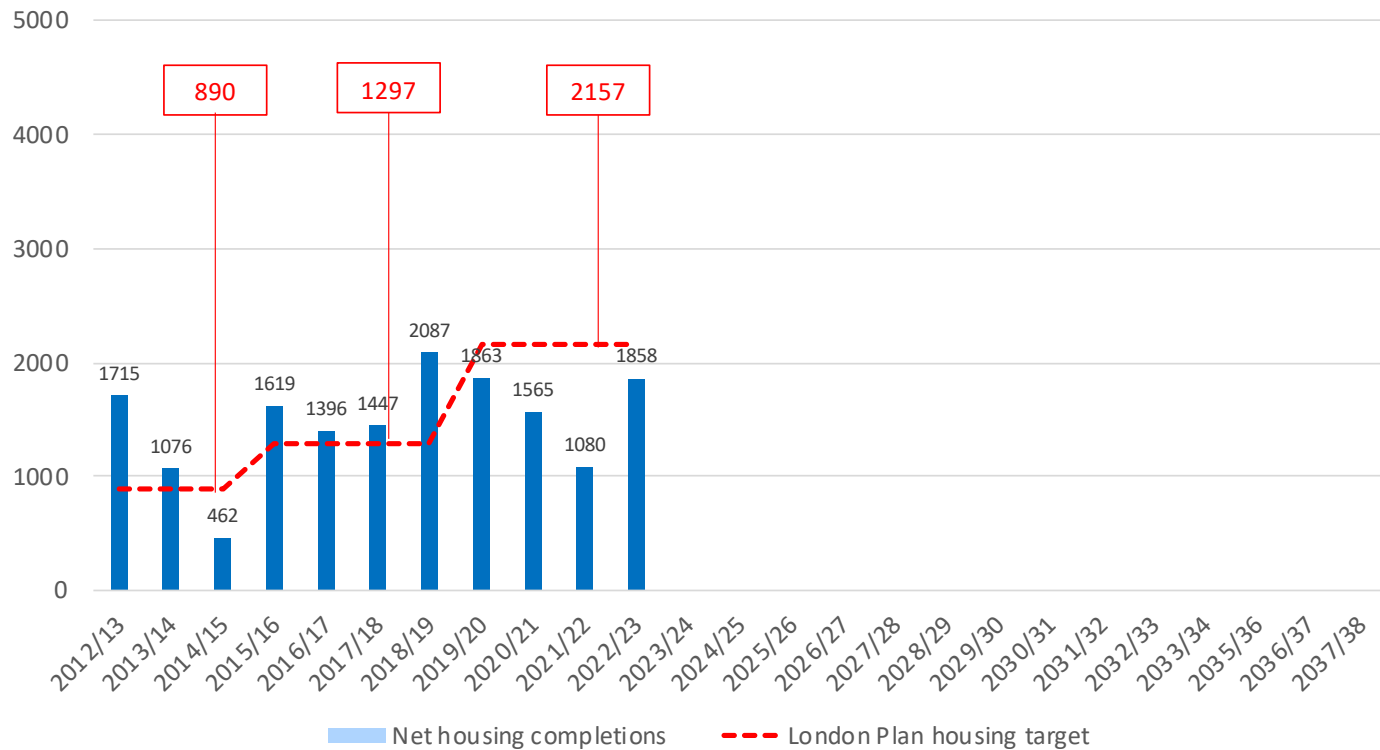
(full description in Chapter 1 page 13)

- Policy G6 promoting biodiversity
- New climate change policies on
 - Operational energy
 - Embodied carbon
 - Whole life cycle approach

Housing, and capacity for growth

- Government pressure means that the plan's real driver is house building
- For Ealing the emphasis is on affordable homes - a political imperative of the Council.
- There's no evidence to show how this can be done. No:
 - Authorities Monitoring Reports,
 - statement of 5 housing year land supply,
 - land availability assessments,
 - up to date brownfield site register
 - statement of resourcing
- This raises big questions about the quality of the developments that are built
- And other questions about deliverability

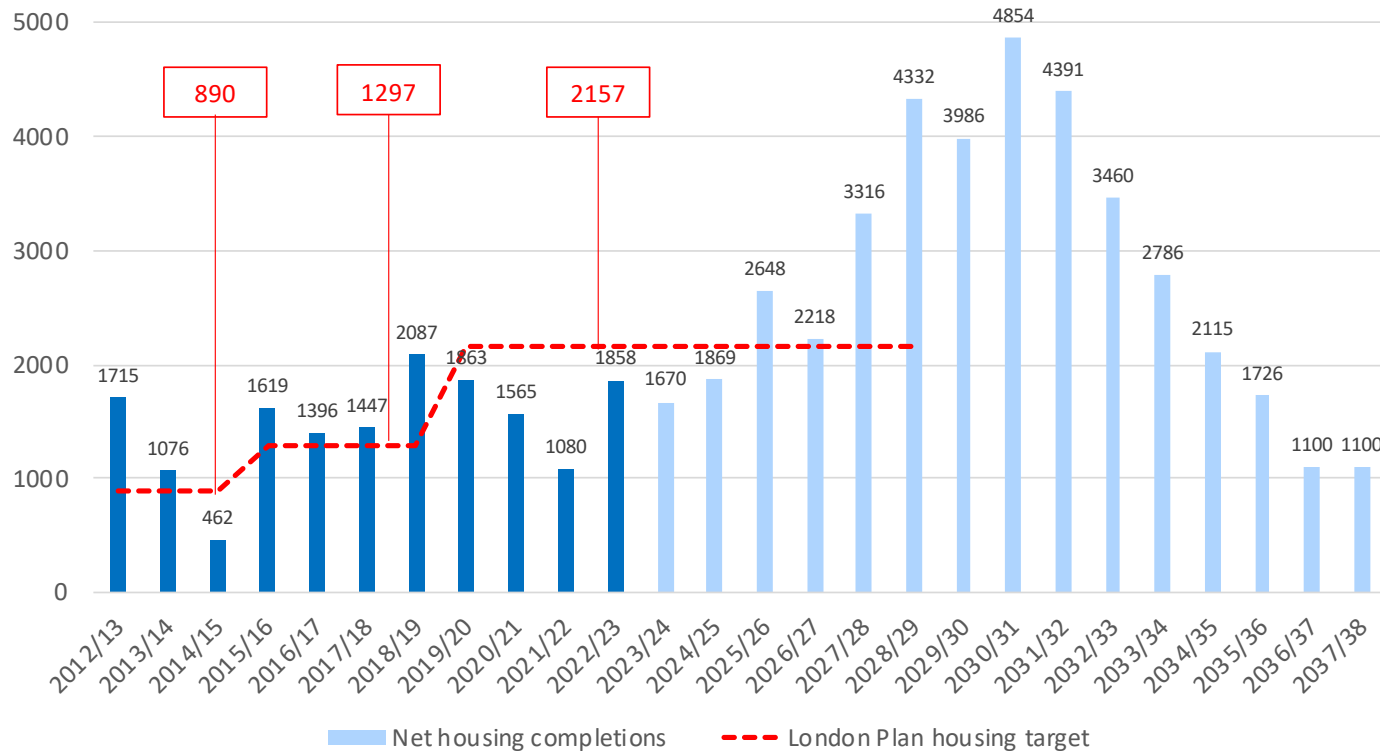
Ealing net housing completions



* Net housing completions include non-self contained accommodation and long-term empty homes returned to use as well as conventional housing

Source: 2012-13 – 2018-19 London Plan AMRs
 2019-20 – 2022-23 Housing Trajectory 2022
 2019-20 – 2022-23 Housing Trajectory 2023

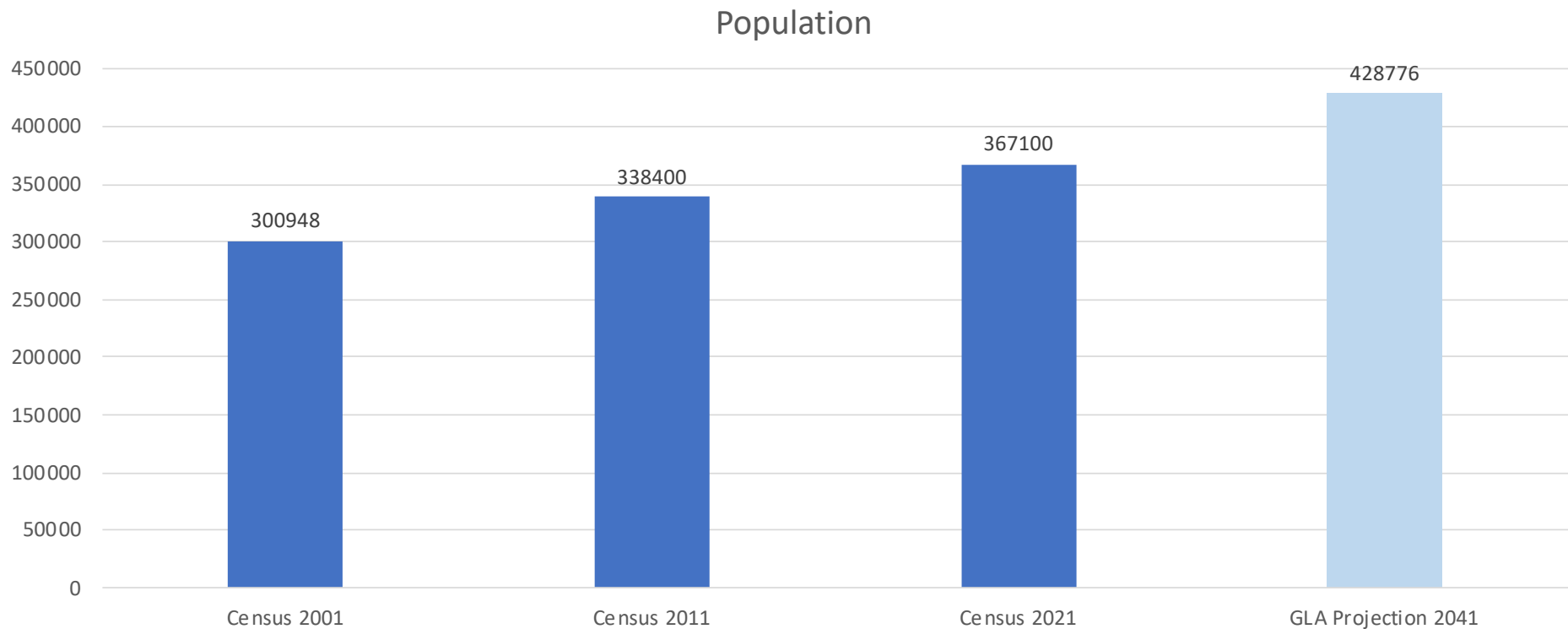
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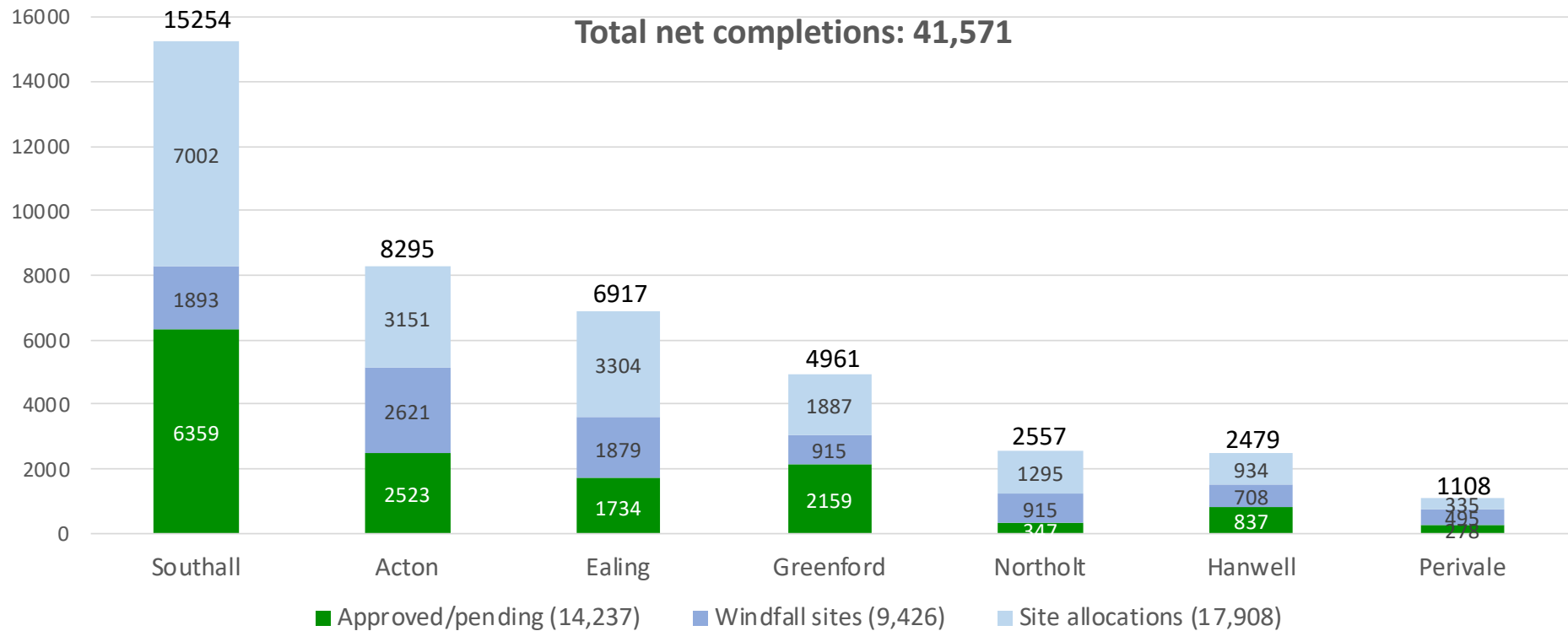
Ealing population growth



Source: ONS/GLA housing-led population projections – identified capacity scenario

Ealing net housing completions by town

2023/24 – 2037/38



Source: Five Year Housing Land Supply Position Statement & Housing Trajectory, November 2023

Infrastructure Planning

Table SS1:
Borough wide infrastructure schemes

Infrastructure Type	Infrastructure Scheme	Infrastructure Provider	Delivery Phasing
Youth Centres	Further work to assess existing assets, and establish opportunities to provide improved youth provision.	Ealing Council	Throughout plan-period
Arts and Culture	Improvements to Improvement Pla		
Sports and Leisure	Provision of a co		
Parks and Gardens	New Regional Pa		
Parks and Gardens	Network of 10 i the borough.		
Amenity green space	Planting 50,000 canopies to 25%		
Cemeteries	Extend Greenfor capacity beyond identify suitable		
Education	Further pupil for secondary, furth		
Secondary healthcare	Ealing Hospital: M		
Secondary healthcare	Ealing Hospital: A		
Secondary healthcare	Ealing Hospital: T		
Secondary healthcare	Ealing Hospital: C		

Infrastructure Type	Infrastructure Scheme	Infrastructure Provider	Delivery Phasing
Secondary healthcare	Ealing Hospital: Energy Centre and Net Zero investments.	North West London ICB	TBC
Secondary healthcare	Ealing Hospital: Endoscopy expansion and refurbishment.	North West London ICB	TBC
Highways	Increase EV charging points throughout Ealing to at least 2,000 points.	Ealing Council / charge	TBC

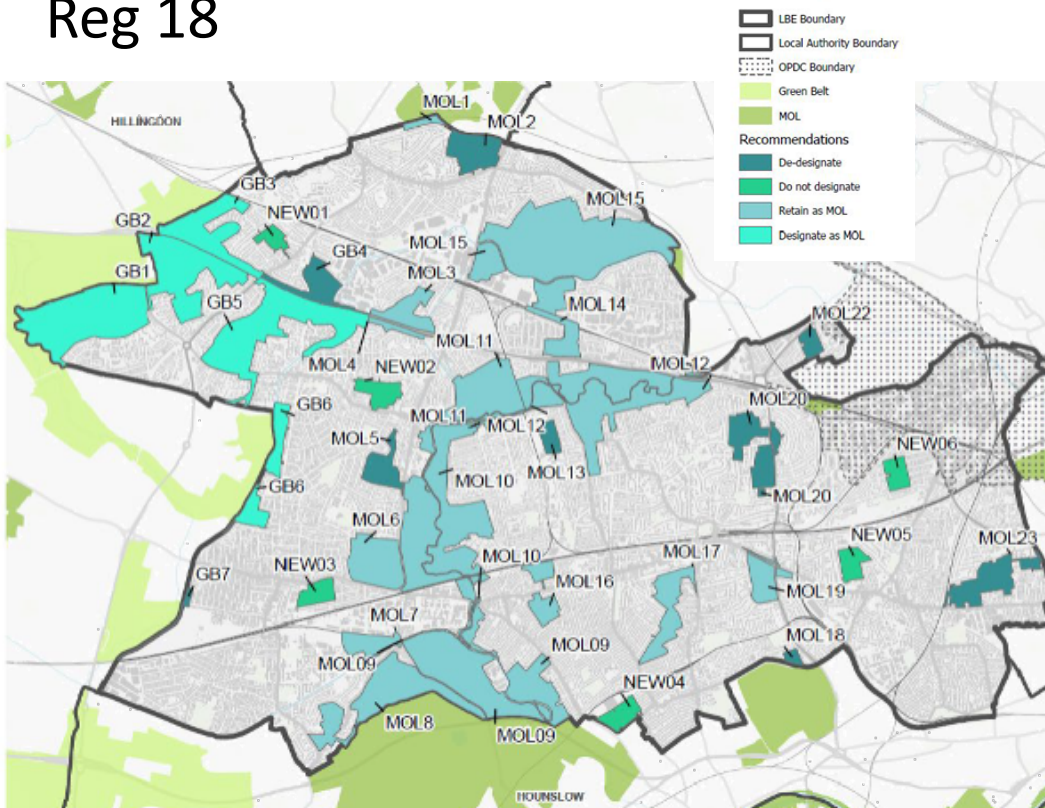
Infrastructure Type	Infrastructure Scheme	Infrastructure Provider	Delivery Phasing
Active travel	Supporting and investing in active travel across the borough, including primary and secondary active travel routes, and public realm improvements.	Ealing Council	TBC
Active travel	A range of projects and programmes to reduce car journeys to school and support more children to walk and cycle.	Ealing Council	TBC
Active travel	Providing more cycle parking (including bike hangars and Sheffield stands) across the borough.	Ealing Council	TBC
Waste and Recycling	Further work to establish the required waste and recycling provision to support self sufficiency and the drive towards the circular economy.	Ealing Council	Throughout plan-period
Heat Networks	Further work with service providers to establish the necessary energy infrastructure and facilitate heat network schemes to support growth.	Ealing Council / infrastructure providers	Throughout plan-period
Digital Connectivity	Further work to deliver improved digital connectivity to full fibre across the borough.	Ealing Council / infrastructure providers	Throughout plan-period

Green and Open Space

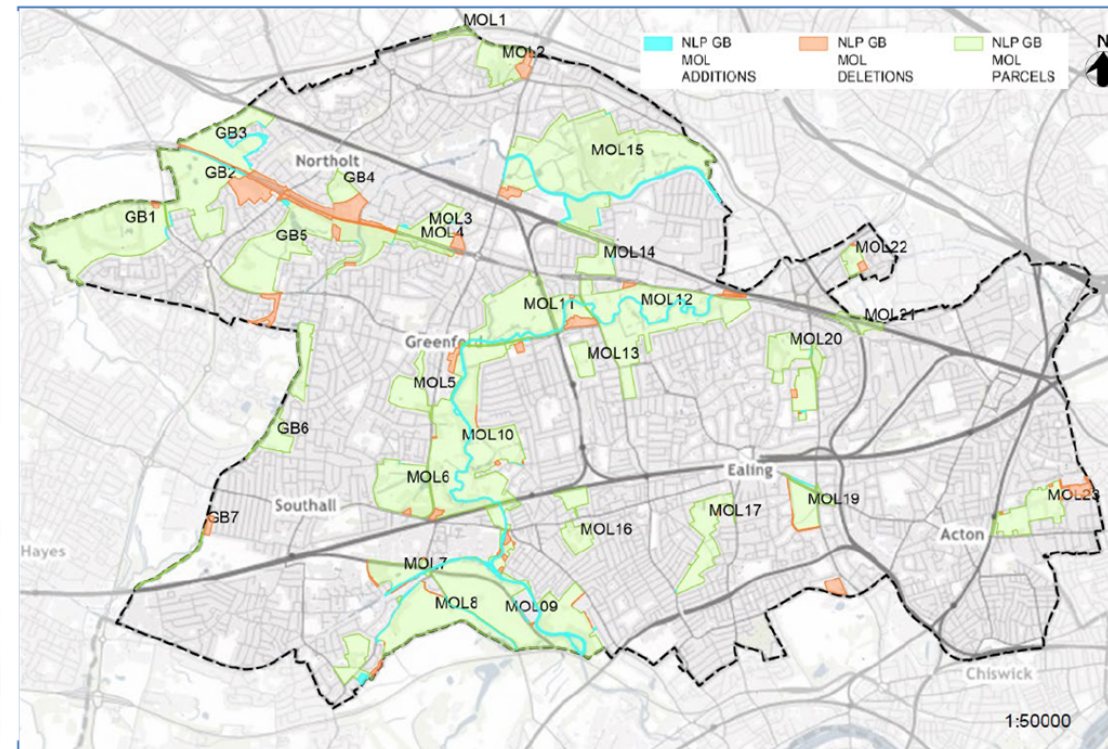
- Some, but not all, the MOL proposed for de-designation will not now be. Old Actonians, part of Barclay Bank Sportsground and Gurnell will lose their protection.
- Policy ENA will be applied to these areas to allow 'enabling development' to be built on them.
- New areas of MOL to be designated including the Brent River and the Grand Union Canal
- A new regional park announced, but not located on the plan

Green and Open space - MOL

Reg 18



Reg 19



Tall Buildings

- Some reduction in heights in site allocations – notably Northolt and Greenford
- No change on tall building thresholds
- Purporting to adapt London Plan Policy D9, the plan concentrates on defining tall buildings.
 - Generally, 6 or 7 storeys, rising to
 - 14 storeys in central Acton and
 - 21 storeys in Ealing.
- Policy wording does not reflect the London Plan Policy

London Plan Policy D9.

B.1: Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan.

Policy D9: Tall Buildings London Plan Ealing LPA – local variation

E. The definition of a tall building in different parts of Ealing is set out in Figure DMP1.

F. Tall buildings above this threshold should be located upon allocated development sites defined in the development plan.

G. Tall buildings on designated industrial sites will be subject to agreed masterplans and based upon local impacts and sensitivity.

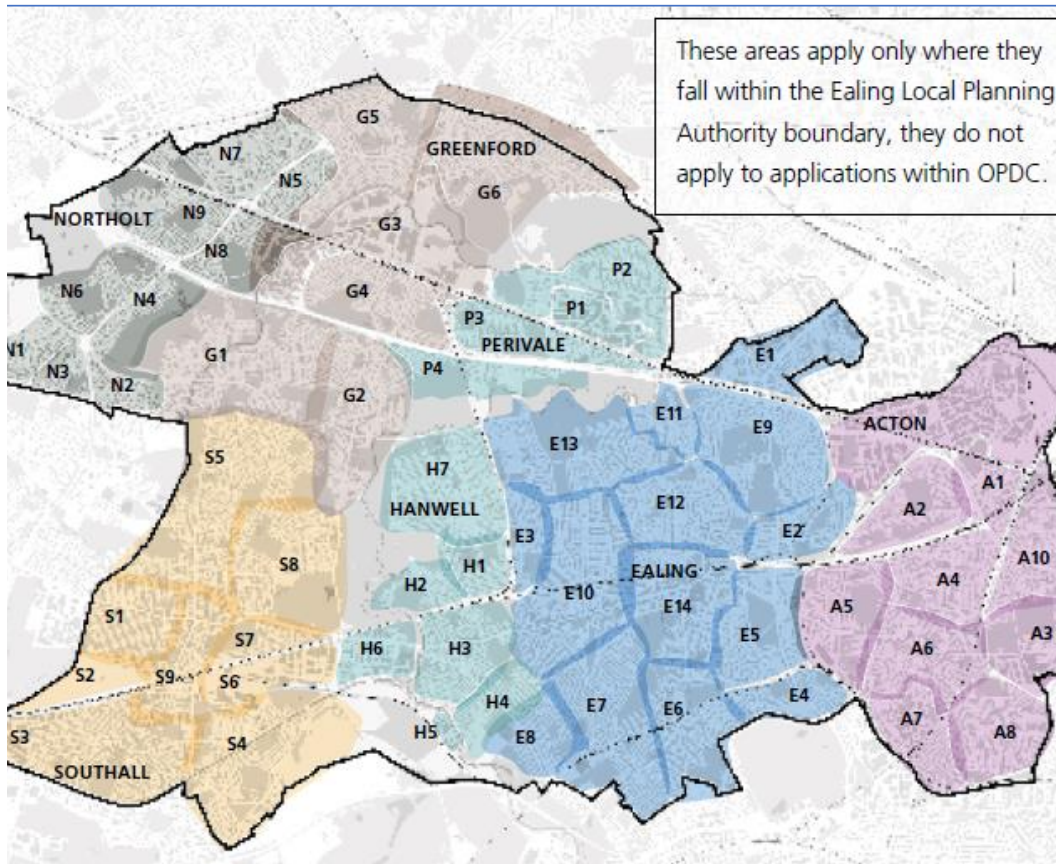


Table DMP1:
Definition of tall building by area

Town	Area	Tall Building (m)	Storeys	Town	Area	Tall Building (m)	Storeys	Town	Area	Tall Building (m)	Storeys
Acton	A1	31.5	9	Greenford	G1	21	6	Southall	S1	21	6
	A2	49	14		G2	21	6		S2	21	6
	A3	24.5	7		G3	21	6		S3	21	6
	A4	49	14		G4	21	6		S4	21	6
	A5	24.5	7		G5	21	6		S5	21	6
	A6	28	8		G6	21	6		S6	24.5	7
	A7	28	8	Perivale	P1	21	6		S7	21	6
	A8	21	6		P2	21	6		S8	21	6
	A10	21	6		P3	21	6		S9	21	6
		21	6		P4	21	6	Hanwell	H1	21	6
Ealing	E1	24.5	7	Northolt	N1	21	6		H2	21	6
	E2	21	6		N2	21	6		H3	21	6
	E3	21	6		N3	21	6		H4	21	6
	E4	21	6	N4		21	6		H5	21	6
	E5	21	6	N5		21	6		H6	31.5	9
	E6	21	6	N6		21	6		H7	21	6
	E7	21	6	N7		21	6				
	E8	21	6	N8		21	6				
	E9	21	6	N9		21	6				
	E10	24.5	7								
	E11	21	6								
	E12	21	6								
	E13	21	6								
	E14	73.5	21								

Heritage

The NPPF says:

Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.

LBE Regulation 19 says:

Nothing

Retail – Ealing Metropolitan Town Centre

Strategic Policy 1:

Delivery of significant levels of development at Ealing Metropolitan Town Centre

Building on its excellent connectivity, Ealing Metropolitan Centre will be the location for significant, high density residential and employment growth. Development will focus on delivering strategic office, commercial, retail, and residential growth, while improving key health determinants including accessibility to and provision of healthcare facilities, deficiency in green open space provision, and improving air quality within the town centre. This will enhance the Metropolitan Centre's role as a destination, with a diverse retail, leisure, and cultural offer and a stronger night-time economy.

Site allocation Ealing – 02EA

Ealing Broadway Shopping Centre and Crystal House (3.59ha)



PROPOSED USE

Retail led, mixed-use scheme with significant retail, employment, residential and community space provision.

Site allocations - Ealing Town Centre 01EA

Reg 18

Site Plan: EA01 Broadway Connection



Reg 19

The Local Plan Reg19

Ealing – 01EA

Broadway Connection & Arcadia Shopping Centre



SITE ADDRESS	SITE AREA (Hectares)	OWNERSHIP
9 – 42 The Broadway, Ealing, W5 2NP	1.14	Council, Private

CURRENT USE

Mixed use, including retail, offices and a range of typical town centre uses with an associated rooftop car park, and a small element of residential use.

PROPOSED USE

Office and mixed-uses suitable to the town centre.

RELEVANT PLANNING APPLICATION(S)

223774FUL

SETTING/TYOLOGY

Centres.

PTAL

6a–6b

TALL BUILDINGS

The site is in principle suitable for a tall building. The threshold height for a tall building is 21 storeys (73.5 metres).

PLANNING DESIGNATIONS/SITE CONSTRAINTS

Flood Zone 3a (surface water), Ealing Town Centre CA, Haven Green CA (adjacent), Grade II* Listed Parish Church of Christ the Saviour (nearby), Grade II Listed 1B The Mall (nearby), Green Corridor (adjacent), Ealing Metropolitan Town Centre.

KEY INFRASTRUCTURE REQUIREMENTS

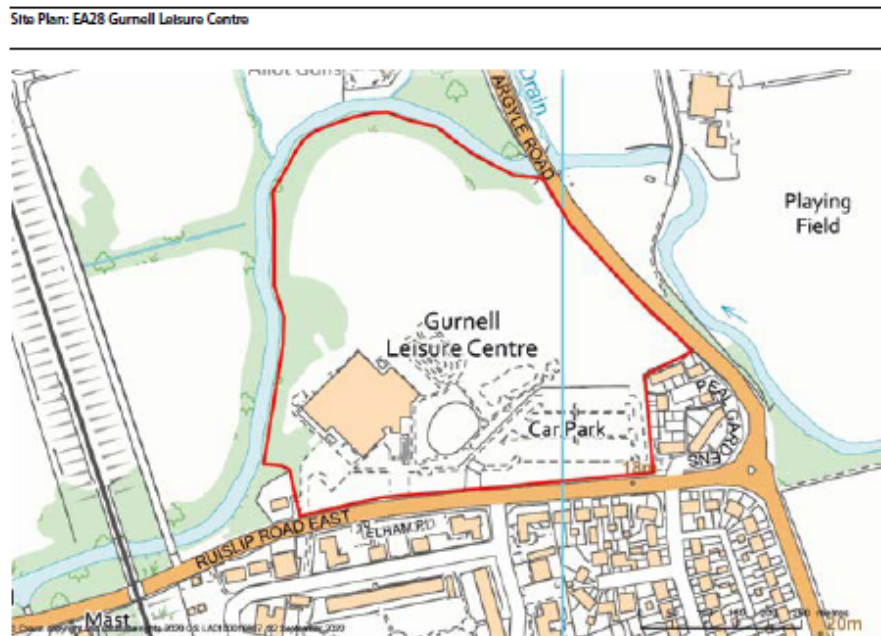
Improvements to the local highway, measures to improve permeability and active travel. Public realm, landscaping and greening improvements. Reprovide music venue.

INDICATIVE TIMEFRAME FOR DELIVERY

Within years 6–10 (2028/29 – 2032/33)

Site allocations Gurnell

- Reg 18



- Reg 19

Figure 3 Proposed removal of MOL designation, Gurnell Leisure Centre



Site allocations – Northolt

The Local Plan _____ Reg19

Northolt – 10NO

Airways Estate



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SITE ADDRESS	SITE AREA (Hectares)	OWNERSHIP
Hotspur Road, Northolt, UB5 6TN	2.52	RSL

CURRENT USE

Residential uses and amenity green space.

PROPOSED USE

Residential.

RELEVANT PLANNING APPLICATION(S)

None.

SETTING/TYPOLOGY

Free-form.

PTAL

1b-2

TALL BUILDINGS

The site is not in principle suitable for a tall building. The threshold height for a tall building is 6 storeys (21 metres).

PLANNING DESIGNATIONS/SITE CONSTRAINTS

Flood zone 3a (surface water), SINC (borough) (adjacent), SINC (metropolitan) (adjacent), Priority Habitats (adjacent), Green Belt, Green Corridor, Public Open Space, Blue Ribbon (adjacent), Strategic Area for Regeneration

KEY INFRASTRUCTURE REQUIREMENTS

Community greening to improve air quality and reduce flood risk

INDICATIVE DELIVERY

Between y



Site allocations - Southall

The Local Plan Reg19

Southall – 2150

Toplocks Estate



SITE ADDRESS	SITE AREA (Hectares)	OWNERSHIP
Glade Lane, Southall, UB2 4PG	4.12	Private, RSL



CURRENT USE

Residential properties, retail and commercial uses, community uses including medical centre and the Havelock Children's Centre.

PROPOSED USE

Residential led mixed use scheme

RELEVANT PLANNING APPLICATION(S)

None.

SETTING/TYPOLOGY

Free-form.

PTAL

1b

TALL BUILDINGS

The site is not in principle suitable for a tall building. The threshold height for a tall building is 6 storeys (21 metres).

PLANNING DESIGNATIONS/SITE CONSTRAINTS

Flood Zone 3a (surface water), Flood Zone 3b (adjacent), Graduated Flood Zone 3a (adjacent), Graduated Flood Zone 3b (adjacent), Metropolitan Green Belt (nearby), Blue Ribbon Opportunity Area, Strategic Regeneration.

KEY INFRASTRUCTURE REQUIREMENTS

Reproviding health and the community centre station. Measures to improve travel and green link.

INDICATIVE TIMEFRAME FOR DELIVERY

Within years 6–10



Want your say?

HOW TO RESPOND

The Reg 19 consultation

- Very important that as many people as possible take part
- The Inspector will only see in their entirety the responses made to the Reg 19 consultation – not the individual contributions made at Reg 18
- The examination will go through the Plan in detail based on an agenda set by the Inspector and based on representations made in the Reg 19 consultation.
- The Inspector will evaluate the new Local Plan against very specific criteria.

Criteria for evaluating the Local Plan

Has the Local Plan been prepared in accordance with legal and procedural requirements?
Is it 'sound'? Plans are 'sound' if they are:

<p>Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p>	<p>Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p>
<p>Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p>	<p>Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy where relevant.</p>

REG 19 CONSULTATION
CLOSING DATE

WEDNESDAY, 10 APRIL
6.00 pm


How to have your say?

- Go to ealing.gov.uk/New Local Plan and click on:
How to have your say and where to find hard copies of the plan
- Take a look at the 'toolkit' – an overview of how to respond
- We recommend you fill in the standard Reg 19 representation form:
 - online via the SurveyMonkey link (**NB you cannot save your response**) or
 - by downloading* and completing the form and emailing it to localplan@ealing.gov.uk. This also allows you to include supporting evidence.
- Alternatively you can:
 - email your comments to localplan@ealing.gov.uk or
 - write to the Strategic Planning Team, Perceval House, 14-16 Uxbridge Road, London W5 2HL

* Hard copies of the Reg 19 representation form are also available in all libraries across the borough

The representation form

- The form has two parts:
 - Part A: Personal details (complete once)
 - Part B: Your representation(s)
- Part B focuses on:
 - individual policies contained in the Plan that the Inspector may wish to cover in the examination
 - whether they meet the criteria of legal compliance and 'soundness'
 - If not, how you think they should change and the evidence for that
 - whether you want to speak to your comment at the examination and, if so, why



Publication Stage Representation Form
LB Ealing Council New Local Plan
Consultation dates: 28 February to 6pm 10 April 2024

Please email back to: localplan@ealing.gov.uk or post to: Strategic Planning Team, Perceval House, 14-16 Uxbridge Road, London, W5 2HL

More information on the New Local Plan and consultation documents can be found here:
https://www.ealing.gov.uk/info/201164/local_plan/3125/new_local_plan

Refer to our <https://www.ealing.gov.uk>

This form has two parts:
Part A – Personal details
Part B – Your representation(s)

Part A

1. Personal details
(If an agent is applicable)

Title*:
First Name*:
Last Name*:
Job Title:
Address Line 1:
Line 2:
Line 3:
Line 4:
Post Code:

Part B (Please use a separate sheet for each representation).

3. To which part of the Local Plan does this representation relate?

Paragraph:
Policy:
Policies Map:

4. Do you consider the Local Plan is: (please tick)

4.(1) Legally compliant


4.(2) Sound

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please set out your comments below.

CREATING GOOD JOBS

CREATING GOOD JOBS **TACKLING THE CLIMATE CRISIS** **FIGHTING INEQUALITY**



Whole plan issues

- There are issues relating to the whole Plan and its failure to meet national policy requirements e.g.:
 - Lack of clarity and succinctness
 - Missing policies
 - The Council's record on monitoring
- Ealing Matters happy to draft a collective response on these:
 - To be circulated to all before submission
 - The NPPF encourages such group submissions

Community engagement meetings with LBE

- Born of our Reg 18 meetings and a desire to uphold Peter Mason's statement on taking over as Leader:
From now on, communities will be in the driving seat when it comes to regeneration in Ealing. Local communities need to lead the process of changing our Borough.
- Three meetings (May and July 2023, January 2024) chaired and minuted by Ealing Matters with a focus on:
 - Housing
 - Local Development Plan Advisory Committee (LDPAC)
- Cllr Manro (member of Cabinet and portfolio holder for *Good Growth*) asked at our last meeting whether and how community engagement meetings might continue.