



**LOCAL PLAN/COMMUNITY ENGAGEMENT**  
**MINUTES OF A MEETING BETWEEN COMMUNITY GROUPS AND EALING COUNCIL**  
Perceval House, 29 July 2024

Present: Cllr Shital Manro, Cabinet Member for Good Growth and New Homes (SM)  
Cllr Sanjai Kohli, Chair of Local Development Advisory Committee (SK)  
Peter George, Strategic Director for Economy and Sustainability (PG)  
Steve Barton, Strategic Planning Manager (SB)  
Alex Jackson, Development Planning Manager (AJ)  
Alex Norfolk, Cabinet Support Officer – Homes & Jobs (AN)

Geoffrey Payne (Chair) (GP)  
Will French, Save Ealing's Centre (WF)  
Libby Kemp, Kay Garmeson, Ealing Matters (LK), (KG)  
Nic Ferriday, Ealing Friends of the Earth (NF)  
David Tennant, Cap the Towers (DT)

**1. Apologies**

Jennifer Peters, Assistant Director for Planning, Design and Sustainability (JP)  
Minni Dogra, Longford Avenue Management Ltd (MD)  
Justine Sullivan, Stop the Towers (JS)

**2. Minutes of 23 January meeting**

Noted and agreed that individual points arising would be dealt with under the relevant headings in the agenda.

**3. How to take forward community engagement on planning after LDPAC**

This agenda item was in response to SM's suggestion at our 23 January meeting that the meetings with Ealing Matters members might continue in a more formalised manner. We had understood then that the Local Development Plan Advisory Committee (LDPAC) had reached the end of its life following delivery of the Reg 19 version of the new Local Plan. However, SM announced that, in view of the level of public engagement with LDPAC, the committee could continue or evolve to become a community engagement forum managed through a panel of councillors and open to all members of the public perhaps under a new name Local Plan Advisory Committee (LPAC) and with a new Chair, Cllr Sanjai Kohli.

WF made the following points about LDPAC:

- Members of the public attending LDPAC were frustrated by being kept out of the conversation, which mostly comprised councillors and officers talking to each other. They wanted the meetings to be more collaborative, but instead they felt excluded from the conversation, and while their contributions were listened to, they did not receive a response.
- While it was good to have meetings that were open to all, most of the participants were from community groups that were more fully engaged than average with the planning process. While Ealing Matters is not representative of the whole community, it does express the point of view of many. GP added that this conferred on Ealing Matters a serious degree of legitimacy.
- To date LDPAC had been focused on production of the Local Plan, whereas it should include a rolling programme of work, the aim of which should be to deliver better places. The focus had been on housing but it should be about more than that, including reporting back on how things are evolving between Plans.

SM stated his intention that LPAC would run in the same way as LDPAC, and that it, and possibly a revised Planning Service User Group, would remain public meetings.

SM also proposed to continue meeting our group on a regular basis to discuss broader issues that we would like to raise. PG also welcomed the idea of a broader focus to these meetings given that the Local Plan has reached a stage where the scope to influence it further is limited. He found the meetings useful, but felt that holding them every six months is too infrequent. It was agreed that they should take place quarterly, with a duration of one and a half to two hours. It was also agreed to increase participation to ensure coverage of each of the seven towns.

**Action:** AN to set up a meeting of this community-led group for the end of October.

Ealing Matters to recruit participants from Greenford, Hanwell, Northolt and Perivale.

#### **4. Local Plan**

##### **4.1 What is happening to the Reg 19 Plan and when?**

###### *Output from the consultation*

SB reported that the Council had received around 650 responses to the consultation from a range of stakeholders (including statutory bodies, community interest groups, developers and landowners as well as members of the public). More than 100 of them were quite substantial, and SB's team is still in the process of analysing them.

SB highlighted a number of the issues raised:

- On housing delivery, the GLA was concerned about LBE's proposal to change the threshold at which a financial viability statement is required for a development site (so-called Fast-Tracking) from a 35% share of affordable housing in the scheme to 40%.

- The owner of the proposed site (Northolt on the border with Hillingdon) for an additional six gypsy/traveller pitches is unwilling to sell so further negotiation will be required.
- Tall buildings. Modifications will be made to the Plan for greater clarity. PG reported that the GLA is moving away from defining ‘maximum’ heights to ‘appropriate’. (See further discussion below.)
- TfL is concerned about levels of car parking on developments, and is requiring a narrower interpretation of the London Plan (i.e. less car parking) for sites such as Waitrose or the Southall Gurdwara with no flexibility.
- The GLA is not happy that LBE wishes to re-designate Hanger Lane as a Local Significant Industrial Location instead of a Strategic Industrial Location.
- LBE has withdrawn most of its plans for de-/re-designation of Green Belt/MOL. The former Barclays Sport Ground site, which is still slated for partial de-designation, attracted considerable objection.

**Action:** SB to publish output to the Reg 19 consultation at the point of submission of the Local Plan to the Secretary of State for independent examination.

#### *Timing of submission and examination*

Statements of Common Ground<sup>1</sup> are being prepared, notably with the GLA, prior to submission of the Plan to the Secretary of State. Submission is scheduled for early to mid-September together with a proposed schedule of minor modifications.

WF suggested that LBE would have to go back to the beginning with the Plan if they are planning changes to the Reg 19 version, which we had been told was final. PG said that LBE may make minor amendments, and while these cannot be made to the Reg 19 Plan itself, LBE may suggest potential changes to the Inspector at the examination in public where they can be discussed and reviewed. The main changes under consideration regard tall buildings and affordable housing for which LBE will need the GLA’s support.

With regard to affordable housing PG reported that LBE is moving away from Shared Ownership tenures in favour of London Living Rent.

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<sup>1</sup> NPPF 2023 para 27 states that: *In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.*

NPPG Paragraph 010 Reference ID: 61-010-20190315 What is a statement of common ground? states that: *A statement of common ground is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It documents where effective co-operation is and is not happening throughout the plan-making process, and is a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries. In the case of local planning authorities, it also forms part of the evidence required to demonstrate that they have complied with the duty to cooperate.*

On tall buildings PG stated that the GLA is moving away from evaluating them based on ‘maximum’ heights in favour of ‘appropriate’ heights. He is starting a review of the Design Review Panel (DRP) and the Community Review Panel (CRP) to improve their influence and effectiveness and ensure the earlier engagement of these panels in the planning process. He is in the process of recruiting additional design expertise in-house. A Conservation Officer will be in post by the autumn and an urban design lead is being recruited to work with the planners.

GP observed from his experience as a member of the CRP that assessment of developments by the DRP/CRP resulted in many minor changes but did not result in any changes on major concerns such as building heights and massing. AJ refuted this, saying that sites are assessed individually for their appropriateness for tall buildings. KG pointed out that this site-based approach is not in line with London Plan Policy D9 on tall buildings. Para 3.9.2<sup>2</sup> states that Local Plans should identify and assess locations within the borough (rather than individual sites) in terms of their appropriateness for tall buildings and then determine a maximum acceptable height for each location. This is the approach taken by Allies and Morrison in its Tall Buildings Strategy prepared as part of the evidence base for Ealing’s new Local Plan<sup>3</sup>. As an example, WF cited Exchange Plaza, for which the Reg 19 Local Plan design analysis clearly stated a maximum height of 10 storeys, but which is going to planning committee with a recommended height of 20 storeys. PG responded that there is no maximum acceptable height according to the GLA.

PG stated that the Statement of Common Ground would be helpful to the agenda once the actual wording is available. He added that planning is more art than science, and that even where appropriate heights are given, other considerations need to be weighed up, e.g. improving housing supply. WF pointed out that people living near the Exchange Plaza site are very unhappy. GP added that the planning system seems rigged, with developers getting whatever they want. PG rejected that notion and responded that London has been failing in terms of housing delivery, and that if what we said were true, the city would not be in that position. LK pointed out the example of the Southall Gas Works site and the fact that, with a long-standing approval for 3,500 units, only around 600 had been built to date. PG pushed

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<sup>2</sup> London Plan 2021 Policy D9 para 3.9.2 states that: *Boroughs should determine and **identify locations where tall buildings may be an appropriate form of development** by undertaking the steps below:*

1. *Based on the areas identified for growth as part of Policy D1 London’s form, character and capacity for growth, undertake a sieving exercise by assessing potential visual and cumulative impacts to consider whether there are locations where tall buildings could have a role in contributing to the emerging character and vision for a place*
2. *In these locations, determine the maximum height that could be acceptable*
3. *Identify these locations and heights on maps in Development Plans.*

<sup>3</sup> It is also re-affirmed in the GLA’s response to LBE’s Reg 19 consultation dated 10 April 2024, which reads: *Policy D9B of the LP2021 specifically uses the terms ‘locations’ and ‘appropriate’ tall building heights. This implies some flexibility which could include a range of ‘appropriate building heights’ across an area. This is considered to be practical in terms of enabling boroughs to focus the tallest buildings in a particular more central part of a tall building zone and perhaps seeking lower building heights towards the edges of that zone.*

back against what he termed was anti-planning sentiment, saying that it was wrong to blame the planners, when it was the developers who were not building out approved schemes.

**Action:** LBE to publish Statements of Common Ground at the point of submission of the Local Plan to the secretary of State for independent examination.

## 2. Statutory reporting

### *Local Development Scheme (LDS) update*

KG observed that Ealing's LDS is a year old and out of date. The legislation requires that this document should be kept up to date<sup>4</sup> to enable local communities to keep track of progress. SB stated that, following submission (i.e. beyond September), the timetable for the Local Plan will be determined by the Inspector appointed to run the examination, and that there will therefore be less for LBE to timetable. He added that there is a move in LBE to automate the development management timetable.

**Action:** LBE to update the LDS.

### *Authorities Monitoring Reports (AMR)*

SB puts the failure to publish any AMRs since 2018-19 down to issues with the Planning London Datahub, which replaced the London Development Database. He promised to update the housing trajectory (published in November 2023 as part of the new Local Plan evidence base) and the housing delivery test in September.

KG asked when LBE's AMRs will be updated. PG answered that 2024 has been more exceptional than previous years, and that SB's team, which is small, is working on the Infrastructure Delivery Plan (IDP) and the Community Infrastructure Levy (CIL). He expressed his aim to re-instate annual AMR reporting. WF noted that the planning regulations<sup>5</sup> require AMRs to be produced annually and that the minutes of the 23 January meeting record the Council's statement that it would revert to doing so. WF added that the regulations require AMRs to carry much more information than on progress towards meeting housing targets.

**Action:** LBE to provide a timetable for the production of AMRs from 2019-20 to the present.

### *S106 reports*

LK reported having put in requests for these reports since 2000, and she criticised the Council for its lack of transparency in this regard. There is only one report on LBE's website (on the page entitled Infrastructure Funding Statement), and that covers the 2019-20 monitoring year. The report is confined to a topline summary, accompanied by an Excel spreadsheet claiming to contain the full data, but effectively listing only individual planning references with a link to the relevant legal agreement. LK complained that it would require a huge amount of work to interrogate the data on this basis.

PG disagreed with LK's view on transparency and asked her to email him to specify the information she wants. He revealed that a permanent Head of Infrastructure will be taking up post in the autumn.

WF argued that the last the public hears about infrastructure payments and how they are spent is via the officer reports to planning committee for individual planning applications. DT suggested that S106 money is directed into a general fund and is not used, as it should be,

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<sup>4</sup> NPPG Paragraph: 003 Reference ID: 61-003-20190315: Statutory duty and the role of plans.

<sup>5</sup> Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012

on infrastructure to mitigate the effects of developments. SM refuted this point and said that the system will change with the introduction of CIL.

**Action:** LK to specify the information she requires from the S106 data, which PG will provide.

## 5. The wider policy framework

### 1. New London Plan

SB explained that active discussion is currently underway between LBE and the GLA on a review of the London Plan with the main focus on gathering evidence including an updated Strategic Housing Land Availability Assessment (SHLAA) for London. The GLA will publish a high-level document early next year, which will be more streamlined in form than previously. A comprehensive new draft London Plan will be published in late 2025 and examined towards the end of 2026 with a public examination in 2026-27. It will take a more strategic approach to Green Belt land but will likely require different mechanisms as GB/MOL extends beyond the boundaries of the GLA.

WF pointed out that, based on the housing targets to which LBE is working, population growth in the borough according to the GLA's own figures will be 80,000 by 2041. He asked whether LBE will continue to encourage higher targets. LK referred to developers gaming the system. PG explained that developers have taken on debt to buy sites. They want to build them out but it is not viable to do so. WF said that this encourages the GLA to require ever higher targets. PG said that LBE will negotiate targets that are fair and reasonable.

WF said that housing targets and population growth in boroughs that are similar to Ealing, e.g. Hounslow (another borough on an east-west axis that has more brownfield land than Ealing), are forecast to be lower than ours. He pointed out that Ealing is a family residential suburb, now changing to become a high-rise extension of the central area. He asked that LBE take this concern into account when negotiating with the GLA.

SM referred to the Local Housing Need Assessment (LHNA) as supporting the housing targets. KG pointed out that the LHNA identifies housing need for local Ealing people as just under 32,000 units taking into account forecast demographic changes, whereas the figure to which LBE is working is 41,727. The LHNA states that the difference between these two figures of almost 10,000 units would address housing need from London as a whole and not local need.

PG said that SB argued down the housing growth targets for LBE in the current London Plan, but that with the future Plan this will be more difficult to achieve. One of the considerations will be transport, notably the Elizabeth Line. The GLA will see untapped potential around stations.

WF pointed out that the Elizabeth Line is full, observing that it is impossible to get on at Southall and West Ealing in the rush hour. PG noted passenger pressure from West London into Central London straining the line's capacity even before further development, e.g. Southall Green Quarter (the old Gas Works site). The Infrastructure Delivery Plan is there to consider the infrastructure needed to make development sustainable.

As an example of the provision of new infrastructure PG mentioned the proposed regional park. LK pointed out that there is no new green space in Acton. Developers in the area all rely on North Acton playing fields, which are quite inadequate for the numbers moving in. PG agreed that Acton is under most stress for green open space. The masterplan for the regional park has not yet been published. He wants this to include 'green fingers' extending out from the main area of the park. He added that he is aware of the need for local parks, and that there will be a masterplan for Acton and the South Acton industrial area that will add 20% more green and open space. LK responded by saying that people won't be able to get to the regional park due to poor public transport links. As an example of the inadequacy of on-site amenity space in new developments DT added that the Friary Park development in Acton should include green space of some 43,000 m<sup>2</sup>, but only 9,000 m<sup>2</sup> has been designated.

PG responded that open space is always a consideration, and AJ confirmed that it has to be taken into account. SM added that there needs to be a balance in planning considerations, to which GP responded that Friary Park is a gross distortion of planning balance.

## 2. New government planning reforms

PG reported that the new Government's NPPF draft consultation would be published this week (w/c 29 July) with an expected rise in housing targets.

## 6. **Heritage and conservation**

PG confirmed that the Council is behind with work on the Conservation Area Review because work on the new Local Plan and the introduction of a Community Infrastructure Levy had taken priority. The first priority of the new Conservation Officer will be to take action on the CA review.

The meeting ended with an expression of thanks by GP to the councillors and planning officers for hosting the meeting and with the hope that future collaboration based on transparency and trust can be of benefit both to the Council and to the community.