Written Representation
on Behalf of Ealing Council on
The Draft London Plan, October 23, 2026



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INTRODUCTION AND KEY MESSAGES:

a) Background:

1. This response is on behalf of Ealing Council to the "The Draft London Plan – The Spatial Development Strategy for Greater London" issued by the Mayor of London for consultation on July 16th, 2026. The Draft London Plan seeks to eventually replace the existing version of the London Plan published in March 2021.

2. Ealing council remains an advocate of a strategic London-wide spatial plan and believe that regional level policies that cover issues of strategic importance, which can be applied directly to decisions, can reduce duplication and ensure greater efficiency in the Local Plan making process. However, there must always be flexibility for LPAs to adapt any policy framework to local or sub-regional circumstances as a 'one-size fits all' approach may not be desirable and/or supported by the evidence.

3. The plan is intended to take account of the new structure and format of the National Planning Policy Framework (NPPF) and be more streamlined and focused than the current London Plan. The council is broadly supportive of the direction of travel for some key aspects of the plan, including the 'Good Growth' objectives, transport infrastructure investment, policies on tackling climate change and the designation of the West London Regional Park as an environmental opportunity area. However, there are a number of significant areas of concern particularly regarding the spatial strategy, housing targets and the potential release of industrial land.

4. In addition, while there are some positive elements, it lacks a clear strategy for enabling the successful delivery of the London Growth Plan. A significant concern is the lack of a specific jobs target for London and the boroughs, which suggests that the economic growth is placed secondary to housing delivery. It pays scant regard to London's three innovation corridors and how a more innovative policy approach to growth and investment within those areas is necessary to maximise their success. This is particularly concerning for west London, Ealing and the Mayor's OPDC regeneration opportunity, plus a range of globally significant anchor institutions, including Imperial College London, who are reliant on WestTech London to expand London's frontier and innovation economy. The London Growth Plan seeks that WestTech generates 80,000 new jobs for the capital by 2030 alone. The OPDC jobs target reduction from 65,000 to 19,900 will also fetter an economic opportunity of national significance and sends the wrong signal to the global markets the Mayor is trying to attract to WestTech London. In summary, the emerging Plan will stymie the productivity growth target set by London Growth Plan, which is critical for the future success of London as a globally competitive city.

5. The council has worked closely with the GLA on a number of projects for many years and there has been some meaningful engagement on some of the evidence base for the plan, but the council is disappointed by the lack of engagement in the development of key aspects of the plan, in particular the spatial strategy and the

approach to housing targets on industrial land. In some areas there has been a lack of clarity about methodology, assumptions, and use of information. Even during the consultation period, some information has been shared late, been difficult to navigate or withheld entirely, which makes it hard to understand how conclusions have been reached and thus if they are robust. Councils have a wealth of knowledge about their areas and could provide a valuable resource in the development of the plan, providing local knowledge and constructive engagement on assumptions, approaches and on the ground implications of options to ensure the plan is robust.

6. This consultation response provides general commentary that addresses our key concerns and the evidence that underpins it. It also provides more specific comments on individual policies which are primarily designed to make policy wording more effective and to strengthen the wording of the plan to achieve better clarity and utility from a development management perspective. These are set out in tabular form.

7. In keeping with Ealing's Connected Communities approach - a vision and approach aimed at strengthening community bonds, empowering residents, and embedding inclusive participation in local decision-making – the council organised and hosted a Community Workshop on the Draft London Plan that was attended by more than fifty people on 15th September 2026.[1]

8. This workshop sought to raise awareness and understanding of the importance of the London Plan, to encourage local residents and community organisations to make their own representations on the draft plan and to help inform Ealing Council's response. We have summarised the key messages received from the workshop throughout this document, and these are denoted in green coloured boxes.

b) The Draft London Plan's Spatial Strategy:

9. Ealing Council has significant concerns over the proposed spatial strategy and validity of the evidential basis (including assumptions, deficiencies in the data, inadequate methodologies and the consequent unreliability of the identified housing capacities). This serves to undermine the basis for the housing target for Ealing LPA and ultimately the robustness of the Plan.

10. Ealing understands the scale of London's housing challenge and has been proactive in enabling and delivering housing[2], however, the Plan must also support jobs, businesses and promoting economic development for our residents. This is a core part of good growth and homes and jobs must not be seen as competing priorities. The plan's focus on housing delivery at the expense of jobs and the sacrifice of the reservoir of industrial land in Ealing and beyond is a fundamental flaw in the overall

[1] The format of the workshop involved a short overview presentation by Ealing Council officers, a facilitated set of workshops involving up to 9 people each and a final plenary session where a local resident provided feedback of the key messages from each group. The session lasted two hours. The event was advertised on the council's web pages, newsletter and through social media channels.
[2] See: Barriers to Delivery and Action Plan – 2025

spatial strategy and serves to undermine our ambition for polycentric growth in West London.

11. Ealing Council has been clear that we need more homes but equally, we need the jobs that will allow people to afford those homes. London must resist the embedding of 'dormitory suburbs' where people commute from London's outer sub-regions to work in the centre and support patterns of local employment and centres of production across the city.

12. West London is the industrial heartland of the capital and a competitive hub for high growth sectors and frontier innovation and has been throughout its history. With the regeneration of Old Oak, the WestTech Corridor, and a resilient secondary and tertiary economy, West London can be the powerful engine of growth for London.[3] Unfortunately, the Draft London Plan could undermine the important progress made in this regard, it does not place sufficient emphasis on the importance of areas of economic growth such as the WestTech Corridor or consider the importance of jobs and economic opportunity.

13. Ealing Council supports good growth and has already permitted significant numbers of new homes and is keen to deliver the homes our residents need, and we want the benefits of growth shared across our seven towns. Whilst we are strongly committed to increasing housing delivery, particularly more affordable homes, we also want to make Ealing a destination for growth in new businesses and jobs that Ealing residents can access. Ealing is also one of the most diverse boroughs in London, with over 170 languages spoken across the seven unique towns of Acton, Ealing, Hanwell, Southall, Northolt, Greenford, and Perivale. This diversity is one of our biggest strengths, making Ealing an international and cosmopolitan place at the beating heart of West London.

14. The council believes that the proposed housing target for Ealing is both untenable and undeliverable because it is based largely on the release of large swathes of industrial land in Ealing with enormous impacts for local businesses and jobs. The evidential basis to support this approach that sits behind the draft London Plan is not considered robust, and the approach in the plan reduces scope for local flexibility in securing specific policy outcomes and weakens the local plan-led system. There has been little or no active collaboration between the GLA and Ealing Council officers on this aspect of the draft plan and the approach and methodology that underpins the setting of housing targets based on the potential release of industrial land is fundamentally flawed.

15. The central problem is not simply that Ealing's housing target is ambitious, or that the proposed release of industrial land would have adverse effects. It is that the Plan attributes a substantial housing contribution to industrial land without reconciling that contribution with the industrial capacity that it also says London needs. The

[3] See: West London's Growth Potential: Leveraging the opportunity for a more polycentric city by the Centre for London, Feb 2025, Foreword by Cllr Peter Mason, Leader of Ealing Council at: West-Londons-Growth-Potential.pdf

GLA's evidence identifies a net additional industrial land requirement for Ealing of approximately 1.2 hectares.

16. Yet the Draft London Plan also relies on significant industrial land release in Ealing to accommodate housing growth. There is no apparent way to reconcile these competing requirements for the same resource of land. That leaves the council in a position of being unable to plan for either target because there is no land, including in Green Belt, to meet these requirements and there is no certainty of delivering industrial release against the wishes of existing landowners.

17 Moreover, industrial land values currently exceed residential values and therefore residential development on many of these sites is not a viable proposition. While Ealing accepts that this can change over time and the span of the London Plan is long-term, the industrially derived targets take effect immediately. This suggests there has been no proper assessment of the deliverability of this source of capacity. Furthermore, our discussions with industrial land owners and developers demonstrate that for many of these locations there is no appetite on any meaningful scale to switch to residential.

18. The Plan's proposed remedies do not resolve this conflict. Policy GLE2 requires authorities to meet strategic industrial needs, collaborate within property market areas and re-provide capacity before release; it also relies on new designations and industrial intensification. Targets are assigned specifically to each borough, and so they must be based upon identifiable industrial surplus within that borough. It should also clarify whether the efficiency savings and intensification already assumed in its industrial-demand benchmarks are being counted again as additional capacity available to support housing.

19. Without that reconciliation, industrial land is treated simultaneously as necessary to meet economic demand and as a source of housing capacity. The resulting housing contribution is therefore a theoretical allocation of windfall, not a demonstrated deliverable supply. The council does not consider that the proposed housing target can be regarded as sound or achievable unless the Mayor either revises the industrial-land housing contribution or provides a credible, evidenced and deliverable account of how the associated industrial need will be met.

20. Ealing council is also concerned that the proposed Affordable Housing threshold does not reflect the nuances of the Ealing market and potentially could lead to Ealing not delivering the maximum viable amount of affordable housing. Furthermore, there is a disconnect between the targets in the plan and affordable grant allocations which could help deliver more of the housing that our residents need.

21. In addition, the scale of delivery more generally is not realistic. Ealing has strived to meet its current target of 2,157 homes a year and latest data shows that despite significant permissions in the pipeline and a proactive approach to development; delivery is significantly below the target. There is a clear acknowledgement in the

Draft London Plan that planning is only one part of the system but that these wider issues around viability, investment and market demand must also be urgently addressed. The principal challenge is often build-out rather than land supply or policy ambition, and the Draft London Plan should prioritise measures that help bring forward good growth, but housing targets must reflect the reality of delivery, otherwise LPAs are being set up to fail, which undermines a plan led system.

22. It is also unclear how the National Planning Policy Framework (NPPF, August 2026) and the Plan are expected to interact, particularly in terms of development around train stations. While the Plan has sought to identify where greenfield land or other land should be released for housing (and notwithstanding our concerns set out above), it is not clear if or how the Plan can ensure the retention of Green Belt and Industrial land in areas that are not earmarked for housing development in the draft London Plan but that would meet the criteria set out in the NPPF.

c) Other issues:

23. **(i) Design –** Ealing is concerned that the Draft London Plan seeks to dilute some of the quality standards that have been developed over time reflecting specific issues in delivering dense development in London. This includes the reduction in ceiling height minimums and the removal of the encouragement of dual aspect dwellings. On the other hand, we support the stronger consideration of long-term maintenance.

24. **(ii) Transport Infrastructure:** Ealing is highly supportive of the interconnected approach to transport, planning and growth, and the need for key investment in transport infrastructure to help support and catalyse growth. In particular, we welcome the inclusion of the West London Orbital, upgrades and/or rolling stock replacement on the Central and Piccadilly tube lines and the need for surface access improvements to mitigate Heathrow Airport expansion (including additional capacity on the Elizabeth and Piccadilly lines). However, we retain concerns about the implementation of the new approach to assessing transport connectivity, and how the Sustainable Access Measure (SAM) tool will work in practice, particularly in conjunction with existing tools. It is important that boroughs and developers alike are clear on the expectations for assessing connectivity and the resulting mitigations required.

25. **(iii) Social Infrastructure:** Ealing also notes that there is limited consideration of the relationship between housing growth and the provision of health and community infrastructure, including primary care, community health services and mental health provision. It is therefore vital that growth does not inadvertently reinforce existing health inequalities.

26. **(iv) Heritage:** Ealing supports the proposed development management approach to the conservation and management of the historic environment. However, greater clarity is sought regarding the conservation of designated and non-designated heritage assets, the protection of local character, townscape and setting,

cumulative impacts and the requirement for development proposals to positively respond to significance. We are also concerned that the scale of housing delivery envisaged by the Draft London Plan for Ealing could increase development pressures on heritage assets and historic areas. Greater emphasis should be placed on the retention, adaptation and reuse of existing buildings (including historic industrial buildings), recognising both their heritage value and their contribution to sustainable development through the retention of embodied carbon. Whilst the council supports the preparation of design guidance where appropriate, caution should be exercised in relation to the use of design codes within conservation areas.

27. **(v) The Economy:** While Ealing supports the Plan's growth objectives, it is concerned that the current approach places too much emphasis on housing delivery without sufficient regard to the employment land needed to support business growth and accessible local jobs. We are assessing the draft Plan evidence in detail, but initial analysis suggests that the proposed housing targets would lead to the loss of a large amount of existing industrial land, impacting hundreds of businesses and thousands of jobs. The implications extend beyond Ealing. The proposed loss of employment land risks constraining business growth across London, undermining the ambitions of the London Growth Plan. It would weaken the foundations of WestTech London, which has the potential to contribute £26bn to London's economy by 2030 and depends on an adequate supply of employment land. The Plan should therefore place greater weight on protecting strategic employment land and fully realising the potential of WestTech London

28. **(vi) Waste:** Ealing supports in principle the continued commitment to achieving net waste self-sufficiency, the streamlined approach to apportioning waste across London to ensure this is managed effectively, support for the transition towards a more resource-efficient and circular economy, the continued protection and safeguarding of existing waste sites and welcomes the continued emphasis on cross-boundary working. However, regarding the apportionment targets, the council has misgivings about the apportionment methodology, capacity calculations and significant concerns about soundness.

29. **(vii) Climate Action:** Ealing fully supports the Mayor's commitment to tackling climate action and broadly supports the suite of policies that deals with energy efficiency, carbon and the whole life cycle and these largely complement our own emerging suite of Local Plan policies albeit with some important differences. However, whilst in principle, stronger compliance targets are favoured in place of a carbon offset mechanism we are concerned that the failure to provide an effective alternative could weaken the delivery of net zero objectives.

30. **(viii) Green and Open Spaces:** Ealing fully supports the new policy promoting more Accessible Green Space. We also welcome the designation of new Environmental Opportunity Areas and the inclusion of the new West London Regional Park, which straddles the borders of Ealing and Hounslow.

31 **(ix) Air Quality:** Ealing believes that the draft policies and the supporting text on air quality would benefit from greater clarity, stronger targets and improved deliverability.

32. **(x) Noise:** Ealing is concerned that whilst the Draft London Plan continues to reference noise across a number of topic-specific policies, it no longer provides the dedicated strategic framework (currently established through Policy D14). As a consequence, environmental noise appears to have shifted from a strategic planning consideration towards a predominantly development management and design issue. The focus has shifted from preventing noise sensitive conflicts to mitigating the effects of future development. This concern is particularly significant in the context of the impact of possible Heathrow Airport expansion.

d) Next steps:

33. Consultation on the Draft London Plan is an important stage in the making of the new plan and before it is submitted and independently examined, Ealing would welcome further constructive dialogue with the Mayor of London and GLA officers**.** We are keen to explore the potential for jointly agreed modifications to the plan together with a detailed review of available and new evidence that could be jointly considered and agreed that would seek to address our very significant concerns. This could inform the basis of a future Statement of Common Ground.

Chapter 1:
Overview of the Plan and Good Growth objectives

This section deals with Ealing Council's representations on Chapter 1 of the Draft London Plan and provides key messages from our community workshop and any detailed comments on specific policies in the plan.

Key messages from Ealing's Community Workshop:

Residents were largely concerned that the proposed housing growth targets, particularly for Ealing, are unrealistic and risk prioritising housing numbers over quality of life, affordability, infrastructure, and sustainability.

Key takeaways included:

The dominant resident message was that quality should take precedence over quantity. Participants broadly supported new housing but wanted it to be:

- Genuinely affordable.
- Family-friendly.
- Supported by infrastructure.
- Environmentally sustainable.
- Respectful of Ealing's character and green spaces.
- Focused on creating successful communities rather than simply meeting housing targets.

Detailed comments on the Draft London Plan are summarised below:

Section	Comments
Good Growth	**General Comments:** The council broadly welcomes and supports in principle the good growth objectives.
The Plan's approach to addressing housing need and setting the target	**General Comments:** The council reiterates the fact that the Draft London Plan attributes a substantial housing contribution to industrial land release paradoxically without reconciling that contribution with the industrial capacity that it also says London and Ealing needs. There is no apparent way to reconcile these competing requirements for the same resource of land. This leaves the council in a position of being unable to plan for either target because there is no land, including in Green Belt, to meet these requirements and there is no certainty of delivering industrial release against the wishes of existing landowners.

Section	Comments
	It should also be noted that our rresidents who attended a Community Workshop on the Draft London Plan were very concerned that the proposed housing growth targets are unrealistic, and they also recognised the challenge of balancing housing delivery with protecting employment land and jobs. Ealing Council shares those very genuine concerns. See Introduction and Key Messages, Paras 8-20 above.
Managing adverse impacts	**General Comments:** It should also be noted that our residents who attended a Community Workshop on the Draft London Plan broadly support new housing, but that quality should take precedence over quantity with emphasis on affordability, sustainability and meeting our place shaping ambitions. A consistent message was that growth should create communities, not just meet housing delivery targets. See also Introduction and Key Messages, Paras 8-20 above.
Beyond the Planning System	**General Comments:** It should be noted that the Draft London Plan sets out how London should grow to 2050. Whilst it is accepted that the capital is currently experiencing an extremely challenging viability context, it is very likely that circumstances will change over time. Therefore, there should be a degree of flexibility so that key metrics can be altered where evidence suggests an improved outlook, particularly regarding affordable housing thresholds. See also Introduction and Key Messages, Paras 8-20 above.

Chapter 2:
Making best use of land and achieving Good Growth

This section deals with Ealing Council's representations on Chapter 2 of the Draft London Plan and provides key messages from our community workshop and any detailed comments on specific policies in the plan.

Key messages from Ealing's Community Workshop:

1. Tall buildings and density

Residents highlighted:

- Significant opposition to very tall buildings.
- Residents generally saw medium-density developments, such as Dickens Yard, as more appropriate examples of growth.
- Concerns included:
  - Impact on quality of life.
  - Lack of supporting services.
  - Family suitability.
  - Community cohesion.

2. Infrastructure must accompany growth:

Residents repeatedly stressed that new housing should only come with adequate infrastructure. Key requirements included:

- GP surgeries and healthcare.
- Dentists.
- Schools and nurseries.
- Parks and green space.
- Community facilities.
- Public transport improvements.
- Leisure and recreational facilities.

A consistent message was that growth should create communities, not just housing numbers.

3. Transport:

Residents highlighted:

- Housing growth should be linked to transport investment.
- Residents wanted improved public transport capacity and connectivity.
- Support was expressed for major transport projects where they facilitate access to jobs and services.

4. Safety and Place-Making:

Residents highlighted:

- Crime and perceptions of safety.

- Designing developments to promote safety.
- Better lighting and public realm design.
- Protecting and strengthening local identity and character.

There was emphasis on creating attractive, healthy and welcoming neighbourhoods rather than focusing solely on housing numbers.

Detailed comments on the Draft London Plan are summarised below:

Policy	Comments
MBUL1 Spatial Strategy	**General Comments:** The council supports Policy MBUL1's objective of coordinating housing, employment and infrastructure growth. However, the policy does not demonstrate that its competing land requirements are compatible. Part B specifies a housing quantum and requires local plans to provide "proportionate space for employment"; Part B (1) also requires them to maintain a reservoir of well-located employment land. In Ealing, a substantial part of the attributed housing capacity depends on the release of industrial land at the same time as the Plan identifies a requirement for net additional industrial capacity. The proposed provision of industrial land in Green Belt Broad Locations for Growth (BLGs), intensification and cooperation across property market areas has no realistic prospect of offsetting that release. At present, the industrial and housing requirements for Ealing are not evidenced and do not seem to reconcile. Alongside housing growth locations, the Plan should identify more specifically the areas suitable for industrial retention, intensification and replacement. Building on its freight-connectivity criteria, this should address strategic-road access, junction capacity, servicing routes, infrastructure and proximity to customers and labour. Replacement capacity should not be assumed until suitable locations and their delivery requirements have been established. **Broad Locations of Growth – Green Belt Industrial**: The spatial strategy, and in particular the identification of the Broad Locations of Growth (BLGs) and their quantified development potential, does not appear to be adequately informed by the suite of Green Belt evidence prepared to support the draft London Plan. This evidence base includes the *London Green Belt Assessment* (May 2026), *Potential Fundamental Impacts on Green Belt Land Report* (June 2026), *Metropolitan Open Land Opportunity Review* (May 2026), *Green Belt Enhancement Opportunities Report* (June 2026), and the *Green Belt Strategic Approach Report* (July 2026). While Ealing Council contributed to the initial Green Belt Assessment (May 2026), the council has not been involved in the preparation of the subsequent studies. Although the reports reference one another, they largely represent isolated outputs and the individual exercises and

Policy	Comments
	findings detailed in each do not necessarily flow from the other studies. Most importantly, the findings from these studies do not appear to have been a primary determinant of the overall growth strategy. The *Green Belt Strategic Approach Report* sets out the process through which the BLGs were identified and refined, emphasising that the process is principally driven by connectivity considerations. In contrast, the assessed performance of Green Belt parcels, including whether they have been identified as potential Grey Belt or whether they may satisfy Metropolitan Open Land (MOL) criteria, appears to have had a limited influence on either the selection of growth locations or the estimation of development capacity. The report explicitly concludes that a spatial strategy led by Green Belt performance would not deliver a sustainable distribution of growth across London. In the context of identifying suitable locations for industrial growth, the evidence base notes that the distribution of potential grey belt does not generally align with areas of high transport connectivity, strategic infrastructure, or locations capable of accommodating the critical mass of development needed to support infrastructure investment and comprehensive master planning. For industrial storage and distribution uses, the studies advise that access to the Strategic Road Network is the primary locational consideration. Whilst the rationale for this approach is explained, the Green Belt evidence base clearly demonstrates that significant policy tensions are likely to arise when planning to meet growth in the identified broad locations of growth. There is, however, little evidence to suggest that these constraints and policy tensions have informed locationally the focus of growth or moderated any assumptions regarding the amount of development that can realistically be accommodated within those locations. Indeed, the *Potential Fundamental Impacts on Green Belt Land Report* and the *Metropolitan Open Land Opportunity Review* appear to have been prepared principally to guide Local Planning Authorities in undertaking their subsequent plan-making activities in response to Policy MBUL1, rather than to shape the strategic choices made through the London Plan around the distribution of growth itself. As noted above, there is limited evidence that the conclusions of these studies have materially influenced the draft spatial strategy. Consequently, policy tensions have been identified and highlighted through the evidence base, but responsibility for resolving them has effectively been transferred to individual local planning authorities through the local plan process.

Policy	Comments
	Within Ealing, the identified Industrial Green Belt BLG, referred to as the "M40 Northolt Area",[4] comprises Green Belt parcels with varying performance according to the GLA's own assessment. Based on this evidence it is reasonable to assume that the potential of individual parcels to accommodate growth without substantial policy conflict varies considerably. The BLG includes parcels that perform strongly or moderately against Green Belt purposes and have not been identified as potential Grey Belt, alongside parcels that perform poorly against Green Belt purposes and have been identified as potential Grey Belt land. It follows then that the opportunities to accommodate growth are not evenly distributed across the area and should not be treated as such. The position is further complicated by the findings of the *Metropolitan Open Land Opportunity Review*, which concludes that all of Ealing's existing Green Belt parcels could potentially satisfy the criteria for redesignation as Metropolitan Open Land. This status will significantly limit the scope for accommodating industrial growth within the defined Green Belt Industrial BLG. This seemingly relaxed position taken in respect of these constraints in developing the spatial growth strategy also contrasts with the approach adopted through the SHLAA where a 100% discount was established for Green Belt and Metropolitan Open Land sites. Accordingly, the spatial growth strategy read alongside the evidence base does not provide confidence that the scale of growth attributed to this BLG is either deliverable or appropriately aligned with the environmental and policy constraints identified through the supporting Green Belt studies. As a separate drafting point, the designation "M40 Northolt Area" appears inaccurate. The M40 both begins and ends outside of Greater London. This growth area might therefore be more appropriately relabelled as the "A40 Northolt Area", unless the intention is to direct growth towards Buckinghamshire Council. **Strategic infrastructure requirements**: Policy MBUL1 Clause B (1) (i) makes reference to sustainable transport investment as detailed in MBUL5/Annex D. We welcome the major transport interventions listed in Table D1 including the inclusion of the West London Orbital, upgrades and/or rolling stock replacement on the Central and Piccadilly tube lines and the need for surface access improvements to mitigate Heathrow expansion (including additional capacity on the Elizabeth and Piccadilly lines).

[4] Within Ealing the potential suitable land identified by the GLA within the growth cluster comprises: Lime Trees Golf Course (excludes SKLP Sports Ground/India Gardens & Lime Tree Park itself), Down Barns Farm and the north end of West London Shooting Grounds (comprising club house and parking area).

Policy	Comments
	However, it is not yet clear how the transport interventions will sit alongside, and be incorporated into, the new and more inclusive approach to connectivity assessment. The approach to measuring connectivity through the SAM tool in addition to PTAL is welcome, but greater detail is needed on the expected approach to coordinating strategic-level or cumulative connectivity gaps (and potential investment) with site-level connectivity assessment and local mitigations. Clause B (5) (ii) makes reference to demand management interventions, as detailed in Policy GHR11. We note and accept the revised approach to cycle parking requirements but are concerned that at strategic level the spatial strategy does not take sufficient account of the cumulative impacts the new approach may have in the long term, e.g. for availability of secure cycle parking when further modal shift has occurred, or for over-reliance on as-yet-unregulated micromobility schemes. **Projected public service infrastructure requirements:** Policy MBUL1 Clause B (5) (vii) states that: "additional strategic healthcare, emergency services and criminal justice infrastructure, commensurate with expected housing-related population and spatial growth to ensure appropriate access, capacity and coverage as set out in Annex F" and Table F1 which sets out projected public service infrastructure requirements. Focussing on healthcare capacity and school place (including special educational needs and disabilities) capacity, it appears the Draft London Plan seeks to push these to be considered at a local level rather than regional / sub-regional strategic level. Education (with the exception of SEND) should be covered at just a local level. It will require discussions with neighbouring boroughs about cross-borough boundary provision but in a more transparent and 'live' data-led fashion. However, health and SEND provision should be tackled at a greater than local level and the council has the following concerns: • **Health and community infrastructure -** Health provision to meet good growth targets does really need to be considered more strategically at least at sub-regional level with the required evidence input from the ICB and wider NHS. We would welcome greater clarity regarding how strategic health infrastructure planning and collaboration with the NHS have informed the Plan. While healthcare is referenced in places throughout the plan, there appears to be limited consideration of how future growth has been aligned with anticipated demand for primary care, community health services, mental health provision and wider social infrastructure. This is particularly relevant in high-growth boroughs such as Ealing,

Policy	Comments
	where significant housing delivery is proposed alongside existing pressures on health and care services. A stronger focus on partnership planning with the NHS and wider health system would help ensure that health infrastructure keeps pace with population growth and supports healthy, sustainable communities. The West London Health Strategy and emerging North & West London Estates Strategy should be referenced in the London Plan Policy MBUL1 Spatial strategy. There should be a sub-regional or even local apportionment of healthcare floorspace needs set out in Appendix F of the London Plan, which should be linked to clear evidence and rationale for the apportionment. It would also be useful if the healthcare capacity expansion needed to support the proposed development at each BLG/BFOA could be set out in the Table F 1. It needs to be demonstrated how/where this can be delivered and funded and within what timescale, to ensure delivery of good growth and not just housing with expanded healthcare waiting lists and hospital queues. • **Special educational needs and disabilities (SEND) -** Policy MBUL1 Clause A (5) (vii), Annex F and Table 1 also specifically exclude education. As school place planning and delivery are primarily the responsibility of individual local authorities and education authorities there is a certain logic in moving away from a standalone education policy (as in Policy S3 in the current London Plan). However, there is a strong case for strategic policy intervention for SEND with the direction of travel in government reforms placing greater emphasis on specialist provision, early intervention and inclusive education. Whilst school place planning remains a borough responsibility, the growing demand for SEND provision often extends beyond borough boundaries and can therefore raise strategic planning considerations. There is a risk that existing services, many of which are already under pressure, will face additional demand and reduced capacity to meet local needs. Therefore, there is considerable merit in the London Plan explicitly recognising SEND and specialist educational provision as a form of strategic social infrastructure. This could support and help boroughs in assessing need, safeguarding appropriate sites and ensuring that specialist education provision is planned alongside housing growth.

Policy	Comments
	Such an approach would also complement the emerging national SEND reforms while building on Ealing's own experience of successfully planning for education infrastructure. On a point of clarity, It seems inexplicable to state in Para 2.17 that: *"....CIL charging schedules can presently penalise higher-density development."* Higher-density developments are charged based on the increased infrastructure need generated by the increased intensity of use, that is the fundamental basis of CIL. It is not possible to deliver good growth without supporting the delivery of the required infrastructure through developer contributions including CIL. Finally, it should also be noted that our residents who attended a Community Workshop on the Draft London Plan repeatedly stressed that new housing developments should only come with adequate infrastructure with a strong emphasis on creating attractive, healthy and welcoming neighbourhoods rather than focusing solely on simply housing delivery targets.
MBUL2 Optimising the use of land and site capacity	**<u>Optimisation Framework:</u>** Ealing seeks clarity on the methodology and assumptions to achieve the density stated in Table 2.1: Optimisation Framework, as the Optimisation Framework Methodology Report relating to the table suggests a high percentage of development coverage (in particular 50-60% for SAM 5) which appears very high in achieving an acceptable quantum of public realm, green and social infrastructure. Further clarity is also needed on the SAM tool in relation to existing tools, i.e., PTAL. Para 2.23 under 'Optimisation' states that "The Optimisation Framework uses the SAM," but officer discussions with the GLA/TfL have implied that PTAL will remain in use as a complementary tool. The policy wording should be clear on the expectations for using SAM and PTAL as planning tools. Whilst the preamble to Policy MBUL2 Clause C makes reference to the spatial strategy in Policy MBUL1 the wording lacks clarity and is therefore not effective. In relation to infrastructure and CIL, it should be specifically amended to include a requirement to demonstrate compliance with Policy MBUL 1, Clauses A3 & B5, in that sufficient infrastructure shall be provided for within the proposal for optimised land use and site capacity. **<u>Small Sites Design Code:</u>** While the Design Code and policies provide certainty on the acceptability of small site development, perhaps greater emphasis could be given to principles of design quality and placemaking (e.g. legibility, wayfinding, servicing, connected communities/ communal spaces approach) that are not easily captured through dimensional

Policy	Comments
	parameters alone. Cumulative streetscape and townscape impact considerations should also be included.
MBUL3 Tall buildings	**General comments**: Policy MBUL3 requires LPAs to undertake extensive sensitivity assessments, identify suitable locations, define their boundaries and set locally justified heights. Yet Part B Clause (3) expressly allows proposals outside those locations to be assessed against only two of the four criteria used to identify suitable locations. The policy therefore imposes a substantial plan-making burden without making the resulting map an effective boundary. The Mayor should clarify whether mapped locations are intended to be exclusive areas for tall-building development or merely locations where it is supported in principle. If the former, Part B (3) should be recast to establish a clear presumption against proposals outside mapped locations, with a narrowly defined exception, and local plans should identify areas where tall buildings are inappropriate. If the latter, the policy should make the required evidence proportionate and ensure that proposals outside mapped locations are assessed against all the relevant location criteria, including whether the area is planned for significant change and whether its townscape can accommodate buildings of the proposed scale.
MBUL4 Utilities – capacity, connectivity, and resilience	**General comments**: The council supports the policy's broad direction, but its detailed requirements should help resolve constraints rather than simply produce more standardised data. Testing during Ealing's Local Plan examination identified no sites dependent on a specific infrastructure project to unlock them, although wider utilities capacity remains important to growth. The Mayor should therefore use MBUL4 and the London Infrastructure Framework to coordinate providers and boroughs around identified constraints, investment responsibilities and delivery timescales. This should include monitoring the cumulative electricity and water demands of data centres across borough boundaries. Where delayed investment affects the housing delivery assumed by the Plan, the GLA should work with providers and boroughs to identify remedial action and assess the implications for delivery trajectories.
MBUL5 Sustainable transport to enable London's Growth	**General comments**: Ealing welcomes the broad direction of the policy, with the objective of sustainable transport and improved connectivity underpinning better use of land and a shift away from vehicle-dominated public realm. We also welcome the policy's recognition of the importance of integrating freight, deliveries and servicing to minimise impacts on the local road network and public realm.

Policy	Comments
	Greater clarity would be appreciated on the expectations and scope for the "set of transport interventions" laid out in the 'Plan-making' box and the extent of detail which will be required at plan-making stage. Several clauses indicate that the scale of work and detail required is significantly greater than before (e.g., references to boroughs requiring TfL strategic transport modelling to assess traffic growth and support the proposed interventions – the time taken for this type of work should not be underestimated). Details on the anticipated role of such modelling would be useful, and whether it is expected that TfL's strategic models will be updated to reflect the implications of the 'decide and provide' vision-led approach to transport planning. Currently, the proposed policy approach that sustainable transport is sufficient to support growth and development, without increases in highway capacity, is being tested at borough level but is likely to face further challenge from National Highways and other stakeholders at pan-London level. A clear approach to modelling expectations, and how boroughs can show that their transport interventions will support growth, would be helpful. Clarity would particularly be appreciated on how these interventions will interact with the boroughs' Local Implementation Plans, as there appears to be significant overlaps with the mapping requirements introduced by TfL for the 25-28 LIP Programme and the types of schemes described. Box MBUL5, Clause 2, notes that: "Maps should identify existing routes or corridors that already meet TfL quality criteria and those that are proposed for improvements." But the assessment method for proposed improvements is not clear, aside from the implication that they would not meet "TfL quality criteria." Is it the intention that boroughs should use the LIP data pack and TfL data-sharing platform to identify proposed improvements? If so, more specific wording to this effect would be very useful. Clause B notes that boroughs must: "identify within site allocations necessary developer contributions (both financial and physical) to enable the transport interventions." Ealing agrees with this approach in principle, but there will be challenges with some sites in identifying the required mitigations and costed improvements at site allocation stage, prior to any assessment of trip generation and expected impacts on the surrounding network. In the absence of this evidence, such identified developer contributions would need to serve as a high-level indicator to developers of the borough's required contributions, rather than as a costed list; the policy wording should make this clear, to avoid future disputes between boroughs and developers on the scope and amount of contributions expected. Finally, it should be noted that our residents who attended a Community Workshop on the Draft London Plan highlighted the fact that housing growth should be linked to transport investment with

Policy	Comments
	improved public transport capacity and connectivity. Support was also expressed for major transport projects particularly where they facilitate access to jobs and services.
MBUL6 High-quality design for a growing, changing city	**General comments**: The policy is supported in seeking to deliver well-designed, high-quality places. This is of fundamental importance if growth is to be successful and supported by residents. Well-designed higher density can support vibrant centres, better public transport and more affordable housing. However, a substantial and rapid uplift in density can create significant urban design risks if it is not matched by infrastructure, design quality and careful placemaking. The risks include: • Erosion of local character • Poor transitions between scales of development and tall buildings creep • Reduced quality of public realm • Pressure on green infrastructure • Reduced residential amenity • Pressure on social infrastructure • Hyper-density without urban liveability **Noise:** This policy makes specific mention of noise at Clause B (7), and this is only one of just fifteen references to noise in the entire plan. Ealing therefore considers that environmental noise should receive greater strategic recognition within the final London Plan as an important determinant of health and wellbeing Whilst Ealing welcomes the continued recognition of environmental noise within a range of development management, housing design and night-time economy policies, together with the continued application of the Agent of Change principle, it still represents a significant change in the treatment of environmental noise when compared with the current London Plan. The Draft London Plan no longer provides a dedicated strategic framework (currently established through Policy D14). As a consequence, environmental noise appears to have shifted from a strategic planning consideration towards a predominantly development management and design issue. This distinction is important. The adopted London Plan recognised environmental noise not only as a matter requiring mitigation at the planning application stage, but also as a factor capable of influencing wider planning decisions relating to site allocation, master planning, land use compatibility and the long-term creation of healthy environments.

Policy	Comments
	The Draft London Plan places significant emphasis on housing delivery through the intensification of brownfield, transport-connected and mixed-use locations, many of which are already subject to elevated levels of road, rail and commercial noise. In this context, the removal of a dedicated strategic noise policy risks reducing the visibility and weight afforded to environmental noise during plan-making and development management decisions. Ealing Council is concerned that the Draft London Plan places a greater emphasis on mitigating noise impacts once development sites have been identified, rather than avoiding or reducing exposure through strategic planning, site selection and master planning. Whilst mitigation will remain necessary in many locations, it should not become a substitute for considering environmental noise exposure at the earliest stages of the planning process. A reliance on mitigation alone may lead to increasing pressure to accommodate residential development within challenging acoustic environments where opportunities to secure high-quality living conditions are inherently constrained. The council is also concerned that the Draft London Plan does not adequately recognise environmental noise as a public health issue. Environmental noise exposure has been associated with sleep disturbance, reduced wellbeing, annoyance and wider adverse impacts on quality of life. Whilst the Draft London Plan appropriately recognises air quality, green infrastructure and climate resilience as important environmental determinants of health, environmental noise receives comparatively limited strategic recognition despite its ability to influence long-term health and wellbeing outcomes. This issue is particularly relevant given the scale and distribution of proposed housing growth. As development is increasingly directed towards higher-density urban environments, transport corridors and regeneration areas, environmental noise exposure has the potential to become unevenly distributed across communities. Households with fewer housing choices may be more likely to occupy homes in locations experiencing elevated environmental noise exposure. Unless appropriately addressed through strategic planning and effective policy safeguards, there is a risk that environmental noise contributes to existing health inequalities over time. The Draft London Plan also presents a missed opportunity to address the increasingly important interaction between acoustics, ventilation and overheating. This issue is becoming more significant as development is directed towards noisier urban environments whilst climate resilience policies seek to minimise overheating and encourage passive ventilation. In practice, these objectives can conflict. Occupants may require open windows to achieve thermal comfort, whilst those same open

Policy	Comments
	windows may increase exposure to environmental noise. The challenge is particularly acute within higher-density developments, single-aspect dwellings and sites located adjacent to major transport infrastructure. Failure to address these issues in an integrated manner may result in developments that successfully meet one policy objective whilst undermining another. Furthermore, unlike air quality, green infrastructure and climate resilience, environmental noise is not supported by dedicated policy metrics, monitoring arrangements or performance indicators. The absence of measurable outcomes limits the ability of planning authorities to consistently secure, monitor and defend good acoustic design through the development management process. The issue is not simply whether noise is referenced within the Plan, but whether the Plan provides sufficient policy certainty regarding the acoustic outcomes development should achieve and whether there are effective mechanisms for evaluating the Plan's success over time. Given the scale of housing growth proposed within brownfield and transport-connected locations, Ealing Council considers that the final Plan should strengthen its approach to environmental noise and provide a clearer strategic framework for managing environmental noise exposure, protecting public health and supporting the delivery of sustainable communities. In the context of proposed national planning reforms intended to support housing delivery in sustainable locations, Ealing Council is concerned that the reduced prominence afforded to environmental noise within the Draft London Plan may weaken consideration of noise impacts during plan-making, site allocation and development management decisions. This issue is particularly significant because many of the locations expected to accommodate future growth are already subject to elevated levels of environmental noise. Without a stronger strategic policy framework, there is a risk that environmental noise is considered primarily through mitigation measures at application stage rather than through site selection, masterplanning and good urban design. Over time, this could result in increasing numbers of residents being exposed to higher levels of environmental noise whilst reducing the ability of local planning authorities to secure consistently good acoustic outcomes through the planning process. Ealing therefore considers that environmental noise should receive greater strategic recognition within the final London Plan as an important determinant of health and wellbeing. This does not require environmental noise to be regulated in the same manner as air quality, but it does require equivalent strategic recognition, clear policy expectations, robust assessment requirements, measurable outcomes and effective monitoring arrangements. Such an approach

Policy	Comments
	would provide a stronger and more consistent framework for ensuring that housing growth and regeneration objectives are delivered alongside the creation of healthy, sustainable and resilient communities. Ealing Council therefore recommends that the emerging London Plan: • Reintroduce a dedicated strategic noise policy building upon the principles and protections currently provided through Policy D14, ensuring environmental noise is considered through plan-making, site allocation, masterplanning and development management decisions. • Recognise environmental noise as an important determinant of health and wellbeing within the Healthy City agenda and afford it strategic recognition alongside other environmental considerations including air quality, climate resilience and access to green infrastructure. • Strengthen policy expectations for major development proposals by requiring applicants to demonstrate how significant adverse noise effects have been avoided, minimised and mitigated through site layout, building design and placemaking measures. • Promote a greater emphasis on preventing or reducing environmental noise exposure through strategic planning and site design rather than relying predominantly on mitigation measures once development sites have been identified. • Introduce measurable monitoring indicators and performance measures to enable assessment of whether noise-related objectives are being achieved throughout the lifetime of the Plan. • Provide specific policy guidance on the interaction between acoustics, ventilation and overheating (AVO), particularly in relation to higher-density development, transport corridors and single-aspect dwellings. **Health Impact Assessment (HIA):** A particularly notable omission in the Draft London Plan is the limited emphasis placed on HIAs. Although mention is made in supporting text (Para 2.89) there is no reference made in policy (unlike the current London Plan at Policy GG3 Clause D). Given the scale of development proposed, HIAs offer an important mechanism for systematically assessing how development may affect health and wellbeing, identify risks and opportunities, and inform both design and mitigation measures. Strengthening expectations around the use of HIAs for major developments would help ensure consistent consideration of issues such as air quality, access to green infrastructure, active travel, play opportunities, climate resilience, community safety,

Policy	Comments
	health inequalities and health infrastructure. This would provide a more coordinated approach to managing the health impacts of growth and ensuring that development contributes positively to population health. Whilst the supporting text also mentions that: "Poor quality design can have long lasting implications for people's health, well-being and quality of life" (Para 2.90) the parent policy makes no mention of health at all, and this is an omission.
MBUL7 London's Heritage	**General comments**: Ealing Council welcomes the inclusion of Policy MBUL7 London's Heritage within the draft London Plan and supports the proposed development management approach to the conservation and management of the historic environment. However, it is important that the policy is carefully assessed against existing Policy HC1 of the London Plan 2021 to ensure that current heritage protections are maintained and, where possible, strengthened. In particular, the council would welcome greater clarity regarding the conservation of designated and non-designated heritage assets, the protection of local character, townscape and setting, and the requirement for development proposals to positively respond to significance. We are concerned that the scale of housing delivery envisaged by the Draft London Plan for Ealing could increase development pressures on heritage assets and historic areas. The Plan should provide stronger safeguards to ensure that housing targets do not inadvertently lead to the incremental erosion of heritage significance, local character or townscape quality. Greater emphasis should be placed on the retention, adaptation and reuse of existing buildings, recognising both their heritage value and their contribution to sustainable development through the retention of embodied carbon. The council is also concerned that the Draft London Plan's emphasis on housing delivery and optimising land capacity could place increasing pressure on industrial areas and employment land, including those within conservation areas and areas which make an important contribution to the borough's historic environment. Industrial buildings, yards and employment areas frequently form part of Ealing's historic development, contributing through their architectural interest, historic associations and townscape value. The Plan should provide greater recognition of the heritage significance of industrial areas and support the retention, adaptation and reuse of historic industrial buildings where appropriate.

Policy	Comments
	The Plan should better recognise the contribution of heritage assets to climate change mitigation through repair, retention, adaptation and retrofit, avoiding unnecessary loss of embodied carbon and supporting the long-term sustainable use of existing buildings. In addition, the cumulative impacts of incremental change on heritage assets, conservation areas, their settings and the wider historic environment should be explicitly recognised and actively managed, ensuring that the long-term character, distinctiveness and significance of London's historic environment is conserved. As currently drafted, it is not yet clear whether Policy MBUL7 provides an equivalent level of protection to Policy HC1 of the London Plan 2021, particularly in the context of increased growth, optimisation and intensification objectives elsewhere in the Plan. Ealing Council would welcome further clarification to ensure that heritage considerations remain fully integrated within the delivery of sustainable growth across London. Furthermore, Ealing Council welcomes the Draft London Plan's recognition of the importance of London's historic environment and supports the emphasis on proactive plan-making. In particular, the council supports the encouragement for Local Planning Authorities to identify, conserve and positively manage heritage assets through local policy, area-based approaches and place-specific guidance. However, whilst the council supports the preparation of design guidance where appropriate, caution should be exercised in relation to the use of design codes within conservation areas. Conservation areas are often characterised by architectural diversity, incremental evolution and historic complexity, and it is not always appropriate or desirable to codify these characteristics through a prescriptive design code. Greater emphasis should instead be placed on understanding significance, character, context and local distinctiveness, supported by conservation area appraisals, management plans and bespoke design guidance where necessary.
MBUL8 Inclusive design	**General comments**: The council supports this policy, in particular, the requirement that in all new buildings where lifts are installed, a minimum of at least one lift per core should be a fire evacuation lift.
MBUL9 Healthy streets and public realm	**General comments**: Regarding Clause D (4), whilst we welcome the inclusion of a requirement to involve local communities including women and girls, in informing the design of public spaces, the proposed wording remains relatively high-level and lacks clarity on how meaningful engagement should be achieved.

Policy	Comments
	The reference to the Healthy Streets Approach (Clause B) and Para 2.116) and the Mayor's Good Growth by Design (Para 2.117) programme is positive; however, we would encourage stronger policy wording that promotes community-led design processes. In particular, the policy should explicitly support co-design and co-production approaches, ensuring that local communities are actively involved in shaping proposals from the earliest stages of development through to delivery and stewardship. This would help secure more inclusive, locally responsive, and vibrant public spaces and streets.
MBUL10 Security and safety	**General comments**: The council supports this policy, in particular, that a competent fire engineer should confirm in the design and access statement that the provisions of Clause C (1) and (2) have been met.

Chapter 3:
Delivering the homes and neighbourhoods Londoners need

This section deals with Ealing Council's representations on Chapter 3 of the Draft London Plan and provides key messages from our community workshop and any detailed comments on specific policies in the plan.

Key messages from Ealing's Community Workshop:

1. Housing Targets and Growth:

Residents were largely concerned that the proposed housing growth targets, particularly for Ealing, are unrealistic and risk prioritising housing numbers over quality of life, affordability, infrastructure, and sustainability.
Residents highlighted:

- Strong concern that Ealing's housing targets are disproportionately high and may be unachievable
- Many residents questioned the methodology behind the targets and whether they reflect local circumstances.
- Residents favoured regeneration and better use of existing sites over extensive high-rise development.

2. Affordability:

Residents highlighted:

- Affordability was one of the strongest recurring themes
- Residents felt the current definition of "affordable housing" does not reflect the reality of London housing costs.
- There was support for:
    - More genuinely affordable homes.
    - More social housing.
    - Prioritising local housing need and waiting list households.
    - Family-sized homes rather than predominantly smaller flats or co-living type schemes.

3. Older People and Accessibility:

Residents felt current development often overlooks:

- Older residents.
- Accessible housing needs.
- Long-term suitability of homes for changing demographics.

Detailed comments on the Draft London Plan are summarised below:

Policy	Comments
HN1 Increasing London's housing stock	**General comments**: It should be noted that our residents who attended a Community Workshop on the Draft London Plan broadly supported the need for more housing but highlighted strong concerns that Ealing's housing targets are disproportionately high and may be unachievable. Many residents also questioned the methodology behind the targets and whether they reflect local circumstances. The council shares those concerns. In addition to the concerns already raised about the release of industrial land set in the Introduction and Key Messages (Paras 8-20 above), Ealing Council also have concerns about the large site and small sites component of housing capacity targets as follows: **a) The large site component:** The council notes that the large site component of Ealing's housing capacity target, comprising both Planning London Datahub (PLD) permissions and other large sites draws from the Land4LDN platform. Ealing officers have actively participated in the Land4LDN exercise and welcome the scope and ambition of the Land4LDN process. We are also grateful for the support provided by GLA officers in assisting Ealing officers in participating in this exercise. Notwithstanding the value of the platform, the process has presented a number of challenges which we believe may affect the reliability of the large site capacity output for Ealing. The following issues are of particular concern: • **The reliability of outputs is contingent on the accuracy and completeness of the PLD records, and the appropriate application of a hierarchy to manage spatial overlaps:** A significant proportion of the identified housing capacity from large sites derives from planning approvals captured in the Planning London Datahub (PLD) and subsequently pulled across into the Land4LDN platform. The reliability of the outputs is heavily dependent upon the accuracy and completeness of the underlying PLD dataset, together with the application of an appropriate hierarchy to manage overlapping records. During the review process, Ealing officers identified a number of issues affecting individual sites and records, including: ○ Missing permissions where approvals have not been captured in the PLD. Where these approvals relate or interact with 'parent' or 'alternate schemes' or other source inputs (i.e. allocations), the correct approach to discounting may not have been possible.

Policy	Comments
	○ Incomplete or incorrect PLD records. In some cases, the residential details and unit count recorded in the PLD record are incorrect. There are also instances where completed units have not been recorded as such and consequently continue to be treated as unimplemented capacity. ○ Missing or incorrect polygons in select instances. This has the effect of not being able to properly consider the interaction between overlapping entries, potentially giving rise to double counting. There are instances also where polygons are too large and entries have been incorrectly categorised as large sites. Having flagged such issues with the GLA during the process, various actions have been taken to remedy or mitigate for such errors. Whilst we are grateful for the assistance provided by GLA officers in working through such issues, we are not confident that all such problems have been resolved. In several instances it has been necessary to employ temporary workarounds, including making adjustments to other related entries in the platform to account for the omissions of other records. We are conscious that as and when the original errors are or have been resolved, it may be necessary to revisit and undo such temporary adjustments to avoid double counting or other inaccuracies. • **The system does not consistently reflect our latest local evidence around phasing and availability/probability of delivery:** Ealing officers have sought to align the Land4LDN inputs with our own local evidence – namely our Housing Trajectory. Much of the detailed review of the Land4LDN inputs undertaken by Ealing Officers was completed before March 2026 as per the work programme set by the GLA. Accordingly, the capacity inputs and phasing reflect Ealing's earlier housing trajectory (version 2 – February 2025). Version 3 was published in March 2026 accounting for completion activity occurring up to the 31st March 2025. Whilst capacity numbers have remained fairly constant between each iteration of the trajectory (with a small number of exceptions) the latest iteration has updated the delivery profile, generally moving anticipated completions further into the plan period by a year or more. Applying the council's most recent evidence would therefore alter the distribution of capacity within the ten-year target period. Some capacity may now fall within the target period that was previously expected earlier, while other capacity may move beyond the ten-year horizon. We would welcome the opportunity to revisit and refine the phasing assumptions so that they more accurately reflect current delivery expectations. We note too that there are a number of instances where the Borough Phasing is recorded as invalid, and there are a number of

Policy	Comments
	reasons preventing this from being resolved. In some cases, this is because overlapping has been applied incorrectly (sometimes stemming from incorrect polygons). Where invalid phasing remains it is unclear if the capacity count is based off the system calculated figure, which may not always best reflect the position. Our latest housing trajectory also accounts for newer evidence in respect of select sites / schemes which may have changed our earlier assumptions around the probability of delivery of such schemes. In several cases involving substantial housing capacity, circumstances have changed materially and there is now a high degree of confidence that an approved scheme will not proceed. In such situations, the council would welcome the opportunity to revisit the relevant Land4LDN entries and either revert to a different capacity input associated with an emerging allocation or apply an alternative scenario based on currently pending proposals. • **The treatment of 2025/26 as a 'past year' in the system:** When populating phasing details in the platform, Ealing officers noted that it was not possible to manually assign capacity to 2025/26. The SHLAA report indicates that the GLA subsequently incorporated expected completion figures for both 2025/26 and 2026/27 separately. However, actual completion figures for 2025/26 are only now being validated through the 2026 Housing Flows Return (HFR), while completions for 2026/27 will not be fully confirmed until Autumn 2027. At the point when the Land4LDN dataset was extracted in May 2026 for the purpose of generating the housing target, PLD source data for Ealing would not generally have logged completion activity occurring during 2025/26. In most cases, only completions up to 31 March 2025 would have been formally recorded. Consequently, the entirety of the remaining unimplemented capacity as of 1 April 2025 for an individual scheme would have been carried forward in the capacity count. Having anticipated and now confirmed that some of this capacity would deliver in 2025/26, the approach we have taken through our local trajectory takes a different approach, assigning a portion of the capacity to 2025/26 and then carrying forward only the residual capacity into subsequent years (i.e. 2026/27 onwards). Because the Land4LDN platform did not allow capacity to be assigned to 2025/26, it was not possible to align phasing assumptions with the council's trajectory. As a consequence, the system defaulted to carrying forward the entirety of the unimplemented capacity (as of 1st April 2025) into

Policy	Comments
	the future years starting with 2026/27, potentially overstating future delivery on some sites. While we now understand that expected completions for 2025/26 and 2026/27 have been incorporated by GLA officers, it remains unclear how these figures have been reconciled with the total permitted capacity for each scheme and whether corresponding adjustments have been made to later years to avoid overestimating overall capacity. • **The treatment of non-conventional inputs:** It is also unclear whether non-conventional records have been comprehensively captured in the system, and where they are included, it is not clear if the count has been consistently calculated / converted. There are instances where these should also have the effect of superseding other permissions, but it has not been possible to correctly assign the primary permission. • **No consultation on the London Context Map:** The council is concerned that no formal opportunity was provided for London boroughs to comment on the London Context Map. The London Context Map is a significant determinant of individual site capacity estimates and therefore has a material influence on the overall housing capacity outputs. Given its importance within the methodology, the council considers that boroughs should have been given the opportunity to review and comment on the mapping and the assumptions underpinning it before it was finalised. **b) Small sites component**: We note from the evidence base (*London Strategic Housing Land Availability Assessment, 2026*) that a number of policy exclusions were employed when identifying and classifying small site opportunities. These exclusions included land within Flood Zone 3. It is unclear from the published evidence whether the extent of Flood Zone 3 used for this exercise reflects only fluvial and tidal flood risk, or whether it has been expanded to account for surface water flood risk. Ealing alongside a number of its neighbouring West London boroughs is unique in extending the definition of Flood Zone 3a to also account for surface water risk, alongside the usual consideration of fluvial and tidal risk. As mapped in Ealing Flood Zone 3a is split into fluvial and surface water subsets, with both being treated equally for planning purposes.
HN2	**General Comments:** The council broadly supports Policy HN2, particularly its requirement to replace social rent floorspace within the same tenure and its continued scrutiny of alternatives to demolition.

Policy	Comments
Protecting and reshaping housing	However, Part A (1) should require proposals to identify and justify any net loss in the number of homes: replacement of equivalent floorspace alone does not ensure that housing stock is maintained. The council also seeks clarification of how existing and additional affordable housing will be measured, secured and phased where an estate redevelopment qualifies for the fast-track route, so that the removal of viability testing does not weaken scrutiny of reprovision. When schemes are unable to meet the fast-track route there needs to be recognition of current market and funding realities for regeneration schemes. If estate renewal schemes are to continue delivering significant affordable housing growth, improved homes and wider place-based benefits, there may need to be a corresponding discussion about increased grant funding and other forms of public intervention to make this achievable at scale.
HN3 Delivering affordable housing	**General Comments:** The council supports the retention of the 50% strategic target for affordable housing, given the level of need across London. It is not clear however how the policy could actually enable the delivery of that level of affordability given the new threshold levels. While it is understood that there are currently viability challenges for some development, it must also be recognised that this is a long-term plan, and the wider policy and economic environment will change over the life of the plan. We are concerned that introducing thresholds lower than 35% undermines the original intention of the threshold approach. The viability tested route remains an option for all schemes where the 35% cannot be reached and thus allows the policy to be flexible in the current climate. While we understand that some developers find the late-stage review introduces uncertainty, given the expectations of the current market, it seems an unnecessary concern if the late-stage review is unlikely to require a greater level of affordable housing. From a planning perspective, it allows the flexibility to take account of current development issues, while still ensuring that that we maximize the delivery of affordable housing if the market does improve. If the move away from the standard 35% across London is pursued, the three-band approach is not nuanced enough to reflect the different viability issues across London and within boroughs. It is suggested that the viability evidence (or other evidence such as existing borough CIL charging zones – which would mean in Ealing, the Ealing Metropolitan Town Centre area would retain the 35% threshold) is used for the basis of a more nuanced system that better reflects the different market dynamics within boroughs.

Policy	Comments
	While we acknowledge that the plan does suggest some flexibility to amend the bands via the local plan process. We do not support the assertion that the same threshold should apply to the whole local planning authority area, or that the threshold should not exceed band A. It is not clear why it would be in the GLA's interest to prevent LPAs from introducing higher thresholds and different thresholds across the LPA where they have evidenced that is viable. The plan also does not recognise that the OPDC is a separate planning authority and thus the OPDC LPA includes two different bands. We are also concerned about the removal of flexibility on the tenure mix, most boroughs currently have a 70/30 Social Rent and intermediate split, reflecting a balance between viability, identified need and the need for mixed communities. The draft policy now dictates a reduced level of social rent, which is somewhat of a double hit for Ealing, with both a reduction of the threshold and the reduction of the social rent proportion. While the introduction of the 'altered' route allows a greater focus on social rent, it represents a further reduction in overall affordable housing. For Build to Rent schemes the plan should set out that LPAs can seek to require social rent. This is crucial given the importance of social rent and the reduction of delivery that the proposals for the thresholds and tenure splits represent. The GLA should model the expected impact on the delivery of affordable housing using the thresholds and housing targets to see to what extent that would fall short of identified need (and the 50% strategic target). The support for C3 affordable as part of student housing and LSPBSL applications is supported. However, the policy should set out that the approach to affordable housing should be agreed with the LPA, this will ensure that applicants do not default to cash in lieu or affordable student bedrooms when affordable c3 would be preferable. Finally, it should be noted that our residents who attended a Community Workshop on the Draft London Plan highlighted that affordability was one of the strongest recurring themes and that they felt the current definition of "affordable housing" does not reflect the reality of London housing costs.
HN4	**General Comments:** The council accepts that meeting the accommodation needs of Gypsy and Traveller and Travelling Showperson households is

Policy	Comments
Gypsy and Traveller accommodation	essential but does not accept the 10-year targets for net additional pitches for Ealing LPA. We believe that the evidence base that underpins the policy is fundamentally flawed in both its approach, methodology and findings. RRR Consultancy Ltd was commissioned in 2022 by the Mayor of London/Greater London Authority (GLA) to undertake a London-wide GTAA. This work fulfilled a commitment in the current London Plan (2021), following a recommendation in the Inspectors' Report on the Examination in Public. The assessment commenced in 2022 and was intended to cover the period 2022/23 to 2031/32, forming a key element of the evidence base for housing and planning policy for the Mayor/GLA and the London boroughs. A Steering Group was established by the consultants to provide advice and oversight. This comprised officers from five London boroughs - Enfield, Hackney, Havering, Kensington & Chelsea and Southwark - together with representatives of the London Gypsy, Roma, Traveller and Travelling Showpeople community. Notably, no West London boroughs were included on the Steering Group. Throughout the assessment process and subsequent feedback sessions, a number of local authorities including Ealing voiced significant concerns regarding the consultants' methodology, approach, data quality and the validity of the results. In June 2024, Ealing officers contacted the GLA to highlight that, across the West London boroughs, significant concerns persisted regarding the methodology, approach and arithmetic underpinning the needs-based assessment for new pitches, among other issues. Due to the vast number of concerns raised by London boroughs, the GTAA experienced repeated delays while these issues were revisited. As a result, Ealing remained reliant on its outdated 2018 GTAA. Therefore, the council decided to commission its own independent evidence and commissioned Opinion Research Services (ORS) to prepare an updated Ealing GTAA who – unlike RRR Consultancy Ltd - has a proven track record and experience in this field. Their report was published in November 2025 and has ensured a more robust, reliable and up-to-date assessment of future accommodation needs for Gypsies and Travellers in the borough and has fed into Ealing's emerging Local Plan. See: SHMA Our whole approach and findings were also broadly supported and endorsed in principle by the London Gypsies and Travelers (who help and support members of the community) at examination hearings into Ealing's Local Plan.

Policy	Comments
	In summary, Ealing's position is that the London-wide GTAA (November 2025) does not provide a sufficiently robust or reliable evidence base, and our future targets will be informed by a separately commissioned evidence base report that post-dates the GLA study.
HN5 Managing specialist accommodation	**General Comments:** It should be noted that our residents who attended a Community Workshop on the Draft London Plan felt current development often overlooks older residents, accessible housing needs and the long-term suitability of homes for changing demographics. Ealing Council broadly supports this draft policy. It should be noted that the PBSA figure is a borough-level benchmark: the appropriate scale and location of provision may vary in response to the needs and estate plans of higher-education institutions. LSPBSL is a distinct housing-market choice rather than an identified category of housing need; proposals may therefore need to demonstrate, on a case-by-case basis, a local rationale for provision. The two uses should not be considered as the same. The co-living policy was originally introduced to provide a policy framework to deal with a new type of development that could otherwise be of poor quality. It is important that the policy is clear about the standards that LSPBSL proposals need to meet and that where schemes have the attributes of co-living such as non-self-contained rooms then they should be treated as co-living and must meet those requirements. If they are essentially self-contained flats, then they must meet the standards for C3 housing. This is to address the issue of poorer quality shared living schemes that we are starting to see being proposed. Ealing would also welcome clarity about the role of apart hotels in London as we are seeing more applications for such uses despite the schemes having the characteristics of co-living. The policy could stipulate that where accommodation includes kitchenette type facilities in rooms, unless there is a limit on the number of days that each occupant can stay (suggest no more than 30 days), the schemes should be assumed to be co-living.
HN6 Build to rent	**General comments**: As noted elsewhere – it is important that LPAs are able to secure social rent on build to rent developments.
HN7 Housing size mix	**General comments**: We have no comments to make.

Policy	Comments
HN8 **Housing design**	**General Comments:** Ensuring that housing is of good quality is extremely important and Ealing support much of this policy .However, we are concerned that the Draft London Plan seeks to dilute some of the quality standards that have been developed over time reflecting specific issues in delivering dense development in London. In particular, this includes the reduction in celing height minimums and the removal of the encouragement of dual aspect dwellings. The 2021 plan included the 2.5 ceiling height requirement, which was also strongly encouraged in the 2016 plan and had been set out in the London Design guide for a number of years before. This recognises The unique heat island effect of London and the distinct density and flatted nature of most of its residential development. It is not clear in the plan why the minimum has changed or that the impact of such a change has been assessed. Ealing support the stronger consideration of long-term maintenance. **Noise:** Although the policy makes specific mention of noise at Clauses A (2) and C (4) and the supporting text, Ealing considers that environmental noise should receive greater strategic recognition within the final London Plan as an important determinant of health and wellbeing. See our comments at Policy MBUL6 above for a more detailed explanation.
HN9 **Accessible housing**	**General Comments:** Ealing supports Policy HN9's aim of providing wheelchair-accessible affordable homes ready for occupation, alongside adaptable market homes. The policy should clarify whether the 10 per cent requirements are calculated separately within the affordable and market tenures, including how rounding applies on smaller schemes. **Noise:** Although the policy makes specific mention of noise at Clause C and the supporting text, Ealing considers that environmental noise should receive greater strategic recognition within the final London Plan as an important determinant of health and wellbeing. See our comments at MBUL6 above for a more detailed explanation.
HN10 **Burial space**	**General comments**: We have no comments to make.

Chapter 4:
Growing London's economy in a way that benefits all

This section deals with Ealing Council's representations on Chapter 4 of the Draft London Plan and provides key messages from our community workshop and any detailed comments on specific policies in the plan.

Key messages from Ealing's Community Workshop:

Data Centres:

This emerged as a major new concern. Residents raised issues about:

- Noise impacts.
- Water use, particularly in water-stressed areas.
- Energy consumption.
- Gas backup generators.
- Proximity to homes, schools and parks.
- Potential increases in local costs.
- Alignment with sustainability objectives.

Detailed comments on the Draft London Plan are summarised below:

Policy	Comments
GLE1 Sufficient and appropriate employment space	**<u>General Comments</u>:** Policy GLE1 is a useful general requirement to plan for a range of employment space and to design light-industrial premises to meet occupiers' operational needs. But it does not resolve the specific land and capacity conflict created by the industrial housing targets. Its broad provision for economic floorspace is not a substitute for demonstrating that industrial capacity lost to housing can be replaced in suitable, deliverable locations. Greater emphasis on sectors and locally determined sectors is welcomed, aligned to Ealing's Jobs and Skills Strategy, although this could be embedded further into the policies around preferred uses for industrial land. With no specific job targets in the new plan – jobs still feel secondary to housing. Intensification of 'suburban' London must not be at the expense of employment floorspace, risking the rise of 'dormitory suburbs' that compound the inequality felt between inner and outer London and contrary to the polycentric growth objectives sets out on the London Growth Plan. A mixed-use approach to intensification would be welcomed (ref: Centre for London research).

Policy	Comments
	As per London Growth Plan, WestTech must have significantly greater weight and more policy hooks throughout the document, noting potential to generate 80,000 new jobs for the capital by 2030.
GLE2 Supply of industrial land	**General Comments:** Policy GLE 2 requires sufficient industrial capacity to meet strategic needs, expects capacity to be re-provided within the property market area before release, and relies on new designations, industrial intensification and, in identified locations, Green Belt release. The demand benchmarks also assume efficiency savings and intensification. The Plan therefore needs to show that these measures can meet industrial needs while also releasing enough land to deliver the housing targets; the same assumed intensification cannot credibly be counted both as capacity to meet industrial demand and as headroom for housing.
GLE3 Data centres	**General Comments:** It should be noted that our residents who attended a Community Workshop on the Draft London Plan regarded data centres as a new major new concern and this is also reflected in the council's response below. The council welcomes and supports in principle the introduction of this new standalone policy framework for data centres, and the clarification that they do not constitute an industrial use for the purposes of GLE2. The council would welcome greater emphasis on ensuring that data centres do not take up land which is located in areas well suited for housing or employment uses given their relatively low employment density and thus ability to be located in areas that would be unsustainable for those other uses – in this regard the council considers poorly connected Grey Belt sites should be considered first prior to consideration of any other land designations. The council would highlight, however, that the statement of the policy reflecting "the need for data centres" is not supported by Para 4.30 under 'Implementation', i.e. "There is significant uncertainty over the scale of demand for data centres." The Draft London Plan requires plan-making authorities to pro-actively identify suitable locations in local plans for data centres to meet need. The council would therefore welcome an opportunity to work with the GLA in developing a joint evidential basis for assessing whether the strategic and economic benefits of additional data-centre capacity justify its consumption of land, electricity, water and other constrained infrastructure, having regard to existing and committed provision across the functional West London market. This evidence base should seek to: • establish the appropriate sub-regional market area and an evidenced range of need;

Policy	Comments
	• assess the existing and committed supply against that need; • develop a common cost-benefit framework for data-centre development; • assess risk of business displacement and changes in local employment and potential impacts on the land market; • test how benefits vary by type and location; • produce a development-management assessment framework; and • help translate the analysis into Local Plan policy choices. **Infrastructure capacity and cumulative impacts** The council supports the policy's recognition of pressure on electricity and water networks, which has already constrained other development in West London. The GLA should coordinate and publish sub-regional information on existing, permitted and proposed data centres and their cumulative demands on power and water, including connections extending across borough boundaries. This should inform decisions on suitable locations and make clear how timely utility provision will be secured without prejudicing housing and employment delivery. The requirement in Clause E (2) to minimise disruption from electricity connections should apply to all data-centre proposals, including those in identified suitable locations. Assessment and mitigation should reflect the effects of cable works on the road network and public realm, as well as operational trips; low on-site trip generation should not obscure the need for proportionate contributions towards works made necessary by the development. **Environmental effects and design:** The assessment of proposals should address cumulative effects on nearby communities as well as ecological sites, including emissions from back-up generation and testing, air quality, waste heat and effects on local temperatures. The policy should require assessment against the Mayor's air-quality objectives, including the WHO Air Quality Guidelines, and consideration of local heat impacts where relevant. Heat recovery infrastructure should be provided or made connection-ready at the outset, given the difficulty of retrofitting it. Proposals should also demonstrate how the layout, massing and treatment of the site respond to surrounding homes, open space, waterways and the character and functioning of the area.
GLE4 Night-time economy	**General Comments:** Policy GLE4 should place greater emphasis on the role of Metropolitan and Major town centres outside Central London. Ealing's centres such as Ealing Broadway, Southall and Acton are increasingly important destinations for food, culture, leisure and community activity. Future growth in London's evening economy should not be concentrated solely in the CAZ and established night-time clusters.

Policy	Comments
	The policy should also recognise that London's night-time economy includes not only hospitality, cultural and leisure activities but also industrial, logistics and servicing functions that operate throughout the evening and overnight periods. In outer London boroughs such as Ealing, industrial areas operating after 6pm are critical to London's economic resilience, supply chains, freight movement and employment base. The policy should provide explicit recognition and protection for these activities, particularly where they are located within Strategic Industrial Locations and other designated industrial areas. **Noise:** Although the policy makes specific mention of noise in the supporting text (Para 4.44), Ealing considers that environmental noise should receive greater strategic recognition within the final London Plan as an important determinant of health and wellbeing. See our comments at MBUL6 above for a more detailed explanation.
GLE5 Culture and creative industries	**General Comments:** The council in principle supports this policy but suggests that the policy wording should be strengthened to protect existing clusters of cultural uses and space for creative industries (particularly on non-SIL industrial land). **Noise:** Although the policy makes specific mention of noise at in the supporting text (Para 4.53), Ealing considers that environmental noise should receive greater strategic recognition within the final London Plan as an important determinant of health and wellbeing. See our comments at MBUL6 above for a more detailed explanation.
GLE6 Visitor infrastructure	**General Comments:** The council in principle supports this policy but further evidence/policy needs to be included regarding new strategic cultural infrastructure for the city, such as music arenas, where transport connectivity can enable this.
GLE7 Affordable workspace	**General Comments:** Ealing supports GLE7's explicit recognition of locally evidenced affordable workspace requirements, including off-site provision and contributions to an affordable workspace fund. This broadly aligns with the council's emerging Local Plan Policy E3 and Affordable Workspace Delivery Plan. However, the policy should clarify whether its specified development triggers are intended to limit locally evidenced requirements applying to commercial floorspace in mixed-use schemes. It should also clarify how its preference for provision in perpetuity applies where a local plan has established an alternative

Policy	Comments
	package of floorspace, rent discount and duration on the basis of need and viability. Affordable workspace provision and contributions should be explicitly recognised as a key mechanism for mitigating displacement and retaining a diverse local business base. On-site provision and off-site funds should support small industrial units, workshops and grow-on space, including acquisition, refurbishment and fit-out of suitable premises through borough delivery strategies. The approach should address total occupation costs, operational suitability, timely availability and long-term management. Its coverage of B2 premises and housing-led redevelopment displacing industrial businesses should be clarified. Affordable workspace requirements should complement, not replace, industrial capacity safeguards and business relocation measures.
GLE8 Access to employment and skills	**General Comments:** The council in principle supports this policy in particular the greater emphasis placed on a more inclusive economy is welcomed. It is broadly aligned to Ealing's Jobs and Skills Strategy, but detail on mechanisms is minimal e.g. sub-regional approach and prioritising London's growth sector opportunities. Greater policy support should be put in place to require London Living Wage Zones / Buildings in new developments.
GLE9 Aviation	**General Comments**: The future of Heathrow airport has huge consequences for the residents of our borough. Ealing Council maintains a longstanding and productive relationship with Heathrow Airport Ltd. Maintaining this good relationship is important given the thousands of Ealing residents who depend on the airport and its supply chain for work and a decent living income, and also for residents who live under the flight path who have to deal with both noise and air pollution. Heathrow's intention to modernise, grow or expand, whether through changes to its existing infrastructure or the addition of a new runway, will have consequences for the region including Ealing. As such, it's important that the council and other key stakeholders, obtain the full details of Heathrow Airport's modernisation, growth or expansion plans, to ensure the impacts are fully understood. As it currently stands, we are not convinced Heathrow can demonstrate it meets our required levels of mitigation and economic development for the borough, but we are studying Heathrow's initial proposals and look forward to taking into consideration our community and stakeholders' feedback.

Policy	Comments
	Ealing is working closely with other local authorities and relevant agencies in close proximity to the airport (going well beyond the boundaries of Greater London) through the 'Heathrow Strategic Planning Group' (HSPG). This provides collective support to the local authorities affected directly by the airport's activities. Participating authorities have agreed an 'Accord' and a 'Statement of Agreed Outcomes' as the basis of any continuing participation. We would urge the Mayor to also get much more involved in assessing both the opportunities and challenges posed by the airport – both now and in the future – and to work collaboratively with the HSPG too. Greater involvement from the Mayor and TfL will be particularly important for assessing and challenging the surface transport impacts of expansion and the required mitigations to support modal shift in journeys to the airport. Ealing supports TfL's extensive responses to the HENPS consultation but would welcome a clearer direction from the Mayor on the approach to Heathrow expansion transport modelling and assessment. We would also welcome a clear position on the expected roles of the Elizabeth Line, Piccadilly Line, Heathrow Express, and additional proposed rail links to the airport, in supporting sustainable growth and expansion. Heathrow's modelling is not incorporating any additional rail infrastructure, with existing services expected to carry the increased demand, and implications for TfL's or other rail services. We welcome the surface access requirements set out in Annex D but are concerned that the approach to modelling and assessment will put the implementation of these mitigation measures at risk. **Advanced Air Mobility (AAM)**: The inclusion of the basis for a strategic policy framework for AAM emerging technologies is timely and welcome. This is a dynamic and expanding aspect that is likely to see considerable change and growth during the plan period, and one that requires a strategic policy framework across London and beyond into neighbouring planning areas into which future operational networks will reach. Ealing broadly welcomes Clauses D, E, F, G and H. However, these do not go far enough to address the future challenges and opportunities ahead of AAM. The basis for a distinction between Clause D for helicopters and helipads, and Clauses F, G and H for AAM and vertiports is rapidly being eroded by new types of aircraft and hybrid powerplants. Many of the issues and features are the same, the distinctions are more about the frequency of use (ATM), purpose of operation (Use Case), size, weight of aircraft (MTOW) and configuration of the

Policy	Comments
	aircraft, and characteristics of blade and powerplant noise. Further consideration should be given to this separation. The Aviation Navigation Directive and Guidance (2026) is clear in clarifying the distinct roles and interaction of land use planning and airspace planning. Land use planning should set the limits and conditions for managing 'aerodromes,' the number of air traffic movements (ATM), hours of operation, any restrictions of types of use, and assessing the land use implications of flight approach and departure routes, for example areas to avoid or preference in order to minimise impacts. However, in order to do this, all planning applications in populated areas should be accompanied with indicative flight paths so that appropriate environmental impact assessment can be conducted (which may include consideration of in combination and cumulative impacts). Both strategic and local planning policies will be necessary with the NPPF to manage these issues. The planning of future flightpaths will be a matter for the CAA and UKADS with proposals submitted through the CAP1616 process. However, ANG is clear that airspace options and decisions should be informed by the preceding land use planning decisions on the appropriate matters identified. In Ealing's view this should include a rationale and explanation of the relationship of a proposed vertiport to the desired network of vertiport operations and routes over the entire London and wider south-east area over which operations can be anticipated. A commitment from the Mayor of London to fully participate in collaborative work with all relevant stakeholders, London Boroughs and adjoining strategic planning bodies is therefore required. This should include development of clear land use and transportation strategy objectives for the optimal use of AAM and integration with surface transport modes. For example: • What types of Use Case warrant use of AAM over surface transport? • Should there be vertiports at strategic rail stations? • What type of local BVLOS drone capability is required at strategic freight logistics locations? • If any local area AAM delivery service is appropriate in a dense urban area with plentiful surface alternatives? These are questions that cannot be answered now but a commitment now in Policy to address these collaboratively is required so that all parties have a direction of work. The existence of visual flight path Helicopter Routes in the London CTR and London City CTR (October 2026) are noted, however these

Policy	Comments
	are not necessarily a suitable basis for future increased activity using BVLOS drones and piloted AAM in all flight weather conditions nor extensive over the area of likely demand. **Noise:** Although the policy makes specific mention of noise at Clause F, Ealing considers that environmental noise should receive greater strategic recognition within the final London Plan as an important determinant of health and wellbeing. See our comments at Policy MBUL6 above for a more detailed explanation. It is to be noted that the noise footprints of new forms of AAM are an active area of research and development and that the change in 'type' of noise as 'loudness' are factors in assessing disturbance and annoyance. It is also noted that the full results of the Civil Aviation Authority's ANNE and ANAS studies into the impact of aircraft noise at day and night, and the Government's response, are still awaited.
GLE10 Safeguarded Wharves	**General Comments:** We have no comments to make.
GLE11 Circular economy	**General Comments:** We welcome the continued drive to embed circular economy principles and outcomes into the design and delivery of new developments. As with the 2021 London Plan, the policy requires referable applications to be supported by a Circular Economy Statement. Having applied this requirement locally since 2021, we endorse the use of Circular Economy Statements and the process established through the London Plan Guidance 'Circular Economy Statements' (2022). However, limiting this requirement solely to referable applications reduces the overall effectiveness of the policy. Through our emerging Local Plan, Ealing council has sought to extend the requirement to all major developments, and we would encourage the Mayor to adopt a similar approach through Policy GLE11. We consider that there are now sufficient experience and evidence across London to justify a broader application of this requirement. In our experience, the preparation and assessment of Circular Economy Statements is not unduly onerous. More importantly, the process provides planning officers with the information necessary to make informed and objective judgements on the extent to which development proposals align with circular economy principles.

Policy	Comments
GLE12 Waste	**General Comments:** We support, in principle, the continued commitment to achieving net waste self-sufficiency, the streamlined approach to apportioning waste across London to ensure this is managed effectively, and support for the transition towards a more resource-efficient and circular economy. We also support the continued protection and safeguarding of existing waste sites, together with the scope for the plan led release of waste sites where justified. This is particularly important given the need to balance significant competing pressures for land across London and to ensure sufficient waste capacity to meet current and future waste needs. We welcome the continued emphasis on cross-boundary working and consider that its effective implementation will require access to robust, up-to-date London-wide information on waste capacity and waste flows. In this regard, the proposed GLA waste capacity monitoring and reporting tool (Resource Futures' Work Package 4) would provide an important mechanism for maintaining a consistent evidence base, monitoring progress towards net self-sufficiency and identifying opportunities for capacity sharing across boroughs and sub-regional waste planning areas. However, the council has misgivings about the apportionment methodology, capacity calculations and concerns about soundness as follows: • **Apportionment methodology**: While the council broadly welcomes the simplified apportionment methodology, the continued establishment of borough, rather than LPA apportionment targets is disappointing and not supported. This decision to determine the apportionments based on the administrative boundaries of the boroughs as opposed to the boundaries of the Local Planning Authorities (LPAs) departs from the approach taken in relation to other areas of target setting in the draft new London Plan (namely the 10-year targets for housing completions), and this decision is not evidenced or justified. There is no practical reason preventing the targets from being re-calculated at an LPA level. The geographical application of the revised apportionment methodology creates a disconnect between a borough's responsibility and its powers as a Local Planning Authority, and Ealing's borough target cannot be effectively implemented by the LPA itself, as the delivery of this target is contingent on opportunities which now sit beyond the LPA's control. This is of particular significance to Ealing, as the planning powers for part of the borough (Park Royal) transferred to the OPDC in April

Policy	Comments
	2015. Despite this change in planning responsibilities, the land falling within the OPDCs jurisdiction continues to determine Ealing's Apportionment Percentage. Despite accounting for only 5% of the area of the borough, the presence of Park Royal has disproportionately driven up the borough's apportionment. Of particular significance is Criterion 1, which is designed to allocate a greater apportionment to those Boroughs which are considered to have greater capacity to accommodate additional waste management capacity, based on the provision of existing facilities and the extent of land in those Boroughs which are potentially suitable for accommodating waste management facilities. A weighting a 40% is now applied to revised criterion 1 under the latest apportionment exercise. Based on designated industrial land (SIL & LSIS), that part of Park Royal managed by the OPDC but located within Ealing, comprises the borough's largest single concentration of employment land, accounting for 42% of Ealing boroughs supply of designated land. If the calculations were done separately based on the LPA boundaries, the apportionment percentage for Ealing LPA would reduce considerably for this criterion. Notwithstanding the ongoing positive arrangement which exists currently for waste planning in west London involving the 6 boroughs and the OPDC, the policy nonetheless should be implementable by any configuration of authorities, including individually across London, recognising the fluid arrangements which might exist in respect of sharing capacity across London. • **Capacity calculations**: It is noted also that work package 2 of the evidence base assesses borough performance against the current 2021 London Plan targets, which will have informed the overall approach taken in the Draft London Plan and influenced the GLA's understanding around West London's capacity position. Having reviewed the methodology undertaken in work package 2, a number of limitations and concerns have been identified, including the reliance on WDI data only, inconsistencies around the use of the best available data across London, the omission of more recent data and planning activity, and unevidenced assumptions regarding the treatment of waste transfer sites. In addition, aspects of the methodology/calculations are not sufficiently transparent to allow for a proper consideration of the evidence. In particular, it is unclear why the emerging WLWP evidence base was not considered within the calculations, and why, in line with National Planning Policy for Waste, alternative sources of the best available data are not considered appropriate to reflect waste capacity at sub-regional level in real-time. Any conclusions regarding capacity need and shortfalls in the WLWP area should therefore take into account the most recent and

Policy	Comments
	locally relevant evidence, including that supporting the emerging WLWP. • **<u>Soundness concerns</u>**: We consider that GLE12(D)(1) should be redrafted to clarify that, where a site is identified for release in a development plan, it is the equivalent capacity of the site in question, rather than the site itself, which should be offered to assist boroughs who have not yet met their apportionment targets. This will provide useful clarity for plan-makers and allow for greater flexibility in implementation, thereby ensuring that the policy is effective. Further clarification would also be welcomed regarding the practical implementation of Policy GLE12(D)(1), including how surplus capacity should be identified, evidenced and shared between boroughs. We disagree with the definition of a waste site at Paragraph 4.100. This definition includes *'a site whose primary activity is a waste-management operation that is authorised by the Environment Agency'*. As drafted, a site which has an EA permit for a waste-management operation but does not benefit from a lawful planning use would be safeguarded, despite the fact that this site might not have been found acceptable in planning terms. This presents issues for the management of development through the planning system, as EA permits relate solely to the control of pollution rather than land-use considerations, resulting in complications to enforcement proceedings relating to unauthorised development where a lawful planning use has not been established. It is also our understanding that EA permits are not 'tied to the land' but instead relate solely to the operator in question (i.e. a specific waste management company or individual). As such, where an EA permit is the sole qualifying criteria for site safeguarding, this status would have to fall away in the event that a permit is surrendered by that operator – something which would take place entirely beyond the purview of the waste planning authority. This could lead to potential issues with waste sites being 'lost' on an ad hoc basis should an operator move on or cease trading, despite the fact that the land in question could still perform the waste operation in question if a new operator were to move onto the site. The approach in Paragraph 4.100 to the existing waste site definition is therefore considered to undermine the Plan's safeguarding objectives and doesn't allow for effective implementation of the policy. To be effective, and therefore sound, the policy should be framed to ensure that its operation is concerned only with matters which the planning authority can influence. The definition of a waste site should therefore be tied to planning status only.

Policy	Comments
	Turning to compensatory capacity, we do not agree with the approach set out in paragraph 4.106 that *'If a site is not operational at the time that a planning application has been submitted, the maximum throughput over the five years preceding the closure should be used'*. We are concerned that such an approach could incentivise developers to run down throughput in the 5 years ahead of closure, thus minimising the compensatory capacity that would need to be secured as part of a planning application. Instead, we consider the policy should require that the best available evidence and site-specific considerations are used to deduce the maximum achievable throughput level for which compensatory capacity should be provided. This should take into account the peak throughput in the 5 years preceding submission amongst other relevant considerations.
GLE13 Aggregates and mineral resources	**General Comments:** The council welcomes and supports Clause A and agrees that no apportionment target should apply to Ealing LPA. The council also welcomes and supports Clause B which states: "Development proposals for exploration, appraisal or production of shale gas via hydraulic fracturing ('fracking') should be refused."

Chapter 5:
Creating a greener, healthier, and resilient city

This section deals with Ealing Council's representations on Chapter 5 of the Draft London Plan and provides key messages from our community workshop and any detailed comments on specific policies in the plan.

Key messages from Ealing's Community Workshop:

1. Sustainability and Climate Resilience:

Residents highlighted:

- A strong desire for homes that are energy efficient, climate resilient, and adaptable to future climate conditions.
- Some residents suggested that challenges to the London Plan should be framed around sustainability objectives where proposals appear inconsistent with climate goals.

2. Reuse and Regeneration:

Residents supported:

- Refurbishing and reusing existing buildings.
- Regenerating existing housing estates.
- Making better use of brownfield and industrial land where appropriate. They also recognised the challenge of balancing housing delivery with protecting employment land and jobs.

Detailed comments on the Draft London Plan are summarised below:

Policy	Comments
GHR1 Energy efficiency	**General Comments:** The council supports in principle the overall thrust of this policy. Moving towards an absolute, energy-based metric is welcome and provides a clearer, more meaningful basis for assessing whether or not development is compatible with net zero objectives. This approach also broadly aligns with Ealing's LPA's emerging Local Plan (which is expected to be adopted at before the end of 2026). However, there are differences between the numerical targets in the Draft London Plan and Ealing's Local Plan, with some of the London Plan targets being less ambitious. We note that there are practical issues that will arise from having two slightly different sets of targets and encourage the publication of the evidence base for this policy with a summary of how this has been translated into policy.

Policy	Comments
	Ealing council is pursuing an energy balance principle, where energy generation is sized to meet or exceed the EUI. Ealing's policy position acknowledges that there are instances where this will not be possible and introduces a mechanism of energy offsetting to remedy this. Clarity is required on how performance gap issues will be remedied in the Draft London Plan, either through enforcement, energy balance or an operational performance guarantee with offset payments. Clauses B-D are intended to apply to major development only. Ealing's emerging Policy OEP applies a smaller threshold capturing proposals creating 1 or more new dwellings and 500 sq. m. of non-residential GIA. Key requirements should apply to smaller developments as well as major schemes because small sites collectively represent a significant proportion of development. Ealing's evidence indicates that minor developments can meet equivalent fabric efficiency, low carbon heat and renewable energy generation requirements, and excluding them from the scope of such policies will ultimately diminish the positive effect of the policy in supporting net zero objectives. Finally, there are no provisions noted for failure to meet operational energy requirements, which could be adopted through enforcement or as part of energy balance and operational performance guarantee. Such provisions need to be made clear in the policy.
GHR2 **Low-cost low-carbon heat**	**General Comments:** There is no specific mention of data centres under Policy GHR2. Whilst it is assumed that data centres must be within the scope of this policy it would be helpful to make specific mention of data centres at least in the supporting text under 'implementation'. New data centres should be obliged to provide necessary infrastructure to connect to future heat networks to recover waste heat. Noting that Policy GLE2 Clause A (3) identifies local heat recovery opportunities as an important locational criteria for data centres, the policy would be more effective if this objective is also cross referenced in Policy GHR2. Connection infrastructure is difficult and costly to retrofit so the policies should be strengthened to ensure that this should be required from the outset.
GHR3 **Whole life-cycle carbon**	**General Comments:** The inclusion of embodied carbon targets is welcomed, although greater clarity is needed on the evidence, limits and development categories used. Closer alignment with stepped best practice targets that become more stringent after 2030 is recommended. Incorporating embodied carbon limits into policy represents an important step because reducing emissions from construction materials and processes is essential to achieving net zero. However,

Policy	Comments
	limits and building categories in the Draft London Plan differ from those in Ealing's LPA's emerging policy, which draws upon LETI best practice targets and applies more stringent limits after 2030. Therefore, the London Plan should explain how its evidence has been translated into the proposed limits and whether the differences reflect any updated assessments of technical feasibility and viability. Furthermore, whole life carbon assessment requirements should be extended from referable schemes to all major developments. Applying whole life cycle carbon assessment requirements to all major developments would significantly increase the policy's effectiveness. Assessments have been required for referable developments since 2021, providing sufficient experience to support wider application. Extending the requirement would give planning officers the information needed to determine whether a broader range of proposals is consistent with net zero objectives. In particular, the policy should also clarify whether Clauses B and C in relation to embodied carbon provisions apply to all development or only to particular scales and categories of scheme. The policy makes no reference to a carbon offset fund which is mandated by current London Plan Policy SI 2 Minimising greenhouse gas emissions. The council believes that: • An effective mechanism should be retained to address developments that cannot meet energy generation requirements on site. • The London Plan should specify whether planning obligations, financial contributions or another mechanism will secure corrective action. • Clear enforcement and remediation arrangements are needed for missed Energy Use Intensity targets and operational performance gaps. In principle, stronger compliance targets are favoured in place of a carbon offset agreement. However, removing the carbon offset mechanism without providing an effective alternative could weaken the delivery of net zero objectives. Where a development fails to meet its Energy Use Intensity target, or cannot achieve an energy balance, the London Plan framework should provide a clear and enforceable remedy. This should address both predicted shortfalls at the application stage and operational performance gaps identified after completion.

Policy	Comments
	Clarity is therefore required on whether compliance and remediation will be secured through planning obligations, financial contributions, negotiation or another mechanism. Any revised approach should be transparent, proportionate and sufficiently robust to ensure that missing a target is not treated as a low-cost alternative to compliance.
GHR4 **Heat risk**	**General Comments:** We strongly support the inclusion of a dedicated heat risk policy and particularly welcome the recognition that urban heat island (UHI) impacts must be addressed through both masterplanning and building design. However, the policy currently places greater emphasis on individual building responses than on strategic site-wide and area-wide interventions. We recommend strengthening the policy by requiring applicants to demonstrate how the overall spatial structure of development reduces heat accumulation and improves thermal comfort across the site, rather than simply considering these factors. This is particularly important for large-scale, high-density developments where the layout and massing of buildings can have a great influence on local temperatures. The supporting text could also recognise that increasing density and tall building clusters can intensify local overheating risks where airflow is restricted. The policy should therefore require heat resilience considerations to be integrated with tall building, density and public realm strategies to ensure that growth does not inadvertently worsen UHI effects or reduce outdoor thermal comfort. The policy should be strengthened to require a whole-site outdoor thermal comfort assessment for major developments, including future climate scenarios. Greater emphasis should be placed on the thermal comfort of streets, squares, parks and other public spaces, recognising that these are critical to public health, active travel and climate resilience. **Noise:** Although the policy makes specific mention of noise in supporting text (Para 5.47), Ealing considers that environmental noise should receive greater strategic recognition within the final London Plan as an important determinant of health and wellbeing. See our comments at MBUL6 above for a more detailed explanation.
GHR5 **Flood risk and drainage**	**General Comments:** Ealing welcomes the increased recognition of surface water flood risk as a strategic issue for London and supports the stronger emphasis placed on climate resilience, Sustainable Drainage Systems (SuDS), integrated water management and catchment-based approaches to flood risk management. The acknowledgement that national policy does not fully

Policy	Comments
	address London's particular surface water flood risk challenges is welcomed and reflects the experience of many London boroughs. The council particularly supports the requirement for boroughs to identify priority areas for surface water management, neighbourhood-scale SuDS interventions and wider catchment-based solutions. These approaches have the potential to deliver multiple benefits including flood risk reduction, biodiversity enhancement, improved water quality, urban cooling, and wider environmental resilience. However, Ealing considers that a number of aspects of the policy would benefit from further clarification and strengthening. **Greenfield runoff rates:** Policy GHR5 requires referable developments to "aim to achieve" greenfield runoff rates through a combination of on-site and off-site measures. Whilst this direction is welcomed, the wording is considered insufficiently robust. Ealing recommends that developments should be expected to achieve greenfield runoff rates wherever feasible, with any departure requiring robust evidence and justification, and any residual shortfall being appropriately mitigated through agreed off-site interventions. **Off-site SuDS contributions:** The proposed mechanism allowing developments to contribute towards off-site drainage and wider catchment interventions is supported in principle, particularly in densely developed urban areas where site constraints may limit opportunities for on-site delivery. However, the policy currently provides limited information regarding the practical implementation of this approach. Greater clarity is required regarding governance arrangements, prioritisation and allocation of funding, delivery responsibilities, maintenance and adoption arrangements, monitoring and reporting of outcomes, and the relationship with existing CIL and Section 106 mechanisms. **Infrastructure and cumulative impacts:** The Draft London Plan promotes significant levels of housing growth and intensification across London. Whilst the Plan acknowledges the importance of flood risk and drainage infrastructure, greater emphasis should be placed on assessing and mitigating cumulative impacts arising from growth. This should include explicit consideration of surface water flood risk, sewer network capacity, watercourse capacity, interactions between multiple developments across catchments, and the timing and funding of infrastructure delivery. The policy should provide greater confidence that flood risk and drainage infrastructure will keep pace with planned growth rather than responding retrospectively once capacity constraints emerge.

Policy	Comments
	The council also considers that flood risk and drainage infrastructure should be recognised as critical enabling infrastructure for growth and afforded equal weight alongside transport, utilities, health and other strategic infrastructure when assessing the deliverability of housing targets and growth assumptions within the Plan. **Integrated Water Management** Ealing supports the continued emphasis on Integrated Water Management Strategies (IWMS), catchment planning and collaborative working between Local Planning Authorities, Lead Local Flood Authorities, water companies and other infrastructure providers. However, further guidance would be welcomed regarding the respective roles and responsibilities of these organisations in delivering integrated water management outcomes and associated infrastructure improvements. **Nature-based solutions:** Whilst the policy appropriately references green infrastructure and sustainable drainage, the council considers there is scope for greater emphasis on natural flood management and nature-based solutions. These approaches can deliver multiple benefits including flood risk reduction, biodiversity enhancement, improved water quality, urban cooling, carbon sequestration, and climate resilience, and should be promoted wherever practical. **Climate resilience:** Finally, Ealing supports the policy requirement for flood risk and drainage measures to account for climate change throughout the lifetime of development. Given increasing rainfall intensity and surface water flood risk projections across London, the council supports a precautionary and future-focused approach to drainage design and flood resilience.
GHR6 Trees, biodiversity and geodiversity	**General Comments:** We consider the following areas will help strengthen the Plan's effectiveness and appropriateness: • **Require planning decisions to be informed by the best available and most up-to-date ecological evidence** recognising LERC data and services as a key component of this. The current London Plan Policy G6 (2021) requirement has not translated effectively into practice. GiGL data searches currently inform only around 1.7% of planning applications in Greater London – the lowest rate of Local Environmental Records Centres (LERC) data use in planning of any region in England.[5] On the basis that about 18% of applications should be informed by a Greenspace Information for Greater London (GiGL) data search,

[5] See: alerc_factsheet_unlocking_better_planning_decisions_for_nature.pdf

Policy	Comments
	more than 48,000 applications may have progressed without the ecological evidence being considered where it should have over the lifespan of the current London Plan.[6] • **Strengthen the requirement to consult the underlying evidence base that informed London's Nature recovery Strategy (LNRS) and the London Green Infrastructure Framework (LGIF)**, clearly explaining the relationship with the more detailed evidence underpinning them. The new Policy GHR6 risks weakening the position of ecological evidence in planning by placing significant emphasis on the LNRS and LGIF. Both are important strategic resources, but they represent strategic snapshots and are not designed to replace detailed evidence. Natural England has specifically clarified that LNRS content will not substitute for LERC data in their guidance note for Responsible Authorities. • **Ensure London's ecological evidence base continues to be updated**, including for use within the LNRS, by making it a clear requirement for new data generated through development management to be shared to the relevant data custodians. • **Provide clearer links to the Sites of Importance for Nature Conservation (SINC) Advice Note and signpost the SINC Resource Hub**, so applicants and decision-makers can readily access the relevant guidance and evidence relating to SINCs. Strengthening these requirements would help ensure that biodiversity is considered at the earliest stages of planning, improve the quality of ecological assessments, and help prevent the loss or inappropriate management of sites and species that are already recognised as important to London. **<u>Noise</u>:** Although the policy makes specific mention of noise in the context of the potential impact of development proposals that are adjacent to or near SINCs in supporting text (Para 5.68), Ealing considers that environmental noise should receive greater strategic recognition within the final London Plan as an important determinant of health and wellbeing. See our comments at MBUL6 above for a more detailed explanation.
GHR7 Green infrastructure and Urban Greening Factor	**<u>General Comments</u>:** Ealing supports the establishment of London-wide UGF target scores. Establishing a consistent approach across London is welcome, although as per existing UGF guidance (2023) the supporting text should acknowledge that local evidence may support the introduction of more stretching targets via Local Plans.

[6] See: Data Searches and Planning - GIGL

Policy	Comments
GHR8 Accessible green space	**General Comments:** Ealing welcomes the stronger emphasis placed on securing accessible green space. Central to this is the need to protect established publicly accessible green spaces. However, we believe the policy could go further in also acknowledging and addressing the potential role of green space which is not publicly accessible currently or where access is controlled or restricted in some way currently (through membership or by function). In addition, care should be taken to ensure that the policy does not inadvertently create a hierarchy that diminishes the value of less accessible or currently inaccessible green spaces. Improving and expanding access to such spaces, where compatible with their primary function and management objectives, should be recognised as an important mechanism for addressing deficiencies in respect of access to green space provision, particularly noting the challenges that exist in respect of identifying and creating new green space. To ensure that such opportunities exist, the policy should also recognise and support the protection of green space which is not currently accessible alongside accessible green space. It should also be noted that our residents who attended a Community Workshop on the Draft London Plan highlighted strong support for protecting parks and open spaces.
GHR9 Clean and healthy waterways	**General Comments:** We have no comments to make.
GHR10 Air quality	**General Comments:** Ealing welcomes the continued emphasis on improving air quality and reducing public exposure to air pollution. The ambition to align planning policy with WHO air quality guidelines is strongly supported. However, several aspects of the draft policy and supporting text would benefit from greater clarity, stronger targets and improved deliverability including: **Policy Aim:** While the overall ambition of the policy is commendable, the policy lacks clear measurable targets against which success can be assessed. The aspiration to work towards WHO air quality guidelines should be supported by defined milestones and outcomes to ensure consistent implementation and monitoring across London boroughs. **Policy GHR10(C):** The requirement for Air Quality Assessments (AQAs) in areas of air quality concern is welcomed. However, the policy should be more explicit that the objective for all

Policy	Comments
	developments in these locations is the achievement of zero-emission outcomes wherever feasible, rather than simply reducing emissions. Given the heightened sensitivity of these areas, a more stringent approach is justified. **Policy GHR10(E):** Greater guidance is needed regarding what constitutes going "beyond" Air Quality Neutral (AQN) benchmarks and how compliance will be assessed. Furthermore, it is unclear why the requirement for additional air quality improvements is restricted to developments subject to EIA. Non-EIA developments can also generate significant cumulative air quality impacts, particularly in dense urban environments and designated areas of concern. **Paragraph 5.107:** The supporting text notes that poor air quality is defined by reference to the fourth interim WHO guideline for PM2.5 and national air quality objectives for PM10 and NO2. Ealing notes that in its current Annual Status Report[1] that national objectives for PM10 and NO2 are already being achieved across the borough. In this context, the continued focus on national objectives does not reflect the Mayor's stated ambition to improve air quality beyond minimum legal standards. The policy should therefore establish clear targets and trajectories towards achieving WHO guideline values for PM10 and NO2, as well as PM2.5. **Paragraph 5.108:** Ealing seeks clarification of the reference to areas where pollution levels are "within 5 per cent of national limits of WHO air quality guidelines". The wording is ambiguous and it is unclear whether the 5 per cent threshold applies to national legal limit values, WHO air quality guidelines, or both. **Paragraph 5.112:** The minimum expectation currently states that development must not cause new exceedances of national limits or delay attainment where exceedances remain. Given that national objectives have largely been achieved, Ealing considers this threshold insufficiently ambitious. The policy should instead focus on supporting progress towards WHO guideline values and ensuring developments actively contribute to further reductions in pollutant concentrations and exposure. **Paragraph 5.114:** The supporting text suggests that operational emissions may only be assessed where the scope is determined to be necessary by the local planning authority. Ealing is concerned that, in practice, this approach could result in significant emissions associated with Heavy Goods Vehicle (HGV) movements being scoped out of air quality assessments. This would reduce local authorities' ability to secure effective mitigation from developments that generate substantial freight traffic and associated emissions. The policy and supporting guidance should make clear that HGV-related impacts must be appropriately considered. Under the

Policy	Comments
	proposed framework, where a development generates fewer than 25 Annual Average Daily Traffic (AADT) HGV movements[2] within, or adjacent to, an Air Quality Management Area (AQMA), HGV-related operational impacts may not be subject to detailed assessment. Ealing is concerned that, while individual schemes may fall below assessment thresholds, the cumulative impact of multiple developments could result in significant adverse effects on local air quality and residents' health. At present, it is not clear that these cumulative impacts are being adequately captured. Furthermore, HGV movements associated with the operation of industrial, commercial, warehousing, logistics and other employment uses are not addressed through the Air Quality Neutral approach. It is therefore unclear what mechanisms are intended to assess and mitigate emissions arising from freight and servicing activity associated with these land uses, and whether those mechanisms are sufficient. The policy should provide greater clarity on how operational HGV emissions from such developments will be assessed, managed and mitigated to ensure that local air quality objectives and public health outcomes are protected. **Paragraph 5.115:** Ealing supports the Air Quality Neutral approach but considers that a single benchmark may not be appropriate across all locations. As stated earlier, it should be made clear that all developments in areas of concern should aim for zero-emission outcomes wherever possible. Higher and more ambitious AQN benchmarks should be applied within identified areas of air quality concern and other locations identified through local evidence. This would better reflect local air quality challenges and support achievement of the policy's overarching objectives. **Paragraph 5.116:** Further clarity is required regarding the treatment of emissions from backup diesel generators. Ealing has encountered cases where developers have sought to scope out emissions associated with generator testing and maintenance from air quality assessment[3], on the basis that impacts are considered minimal. The policy should provide clear criteria for when generator emissions must be assessed, ensuring a consistent approach across London boroughs. Robust assessment of these emissions is increasingly important given the growing reliance on backup generators in major developments, particularly to support fire safety and resilience requirements. Without clear policy direction, there is a risk that the cumulative impact of generator emissions on local air quality will not be adequately captured or mitigated.

Policy	Comments
GHR11 **Cycle and car parking**	**General Comments:** As noted in the response to MBUL1, Ealing notes and accepts the shift in approach to provision of cycle parking, with some concerns remaining about the cumulative impact of less provision of secure cycle parking for those who own a bicycle. The policy rightly makes reference to both London Cycling Design Standards (LCDS) and Local Transport Note (LTN) 1/20 for cycle parking and design requirements. Both of these documents recommend that 5% of overall parking provision should be enlarged spaces for larger bicycles, including some of those used by people with mobility impairments. For clarity, does this 5% threshold remain as the appropriate recommendation for larger cycles, or should this be now increased to accommodate the growing use of cargo bikes (e.g. for deliveries, parents transporting children) and an aging population? For example, Islington's Local Plan (2023) stipulates that 20% of long-stay cycle parking for new developments should be provided as accessible cycle parking spaces, of which 25% must be designated for non-standard cycles and 75% for ambulant disabled cyclists using regular cycles.[7] Ealing would welcome a similar recommendation in the London Plan.

[7] See: Islington Council Local Plan: Strategic and Development Management Policies page 298.

Chapter 6:
Place visions and place-based approaches

This section deals with Ealing Council's representations on Chapter 6 of the Draft London Plan and provides key messages from our community workshop and any detailed comments on specific policies in the plan.

Key messages from Ealing's Community Workshop:

Green Belt, Parks and Open Space

Residents highlighted the following:

- Strong support for protecting parks, open spaces and the Green Belt.
- Most participants felt Green Belt development should be a last resort.
- Greater emphasis was placed on using brownfield land effectively before considering greenfield sites.

Detailed comments on the Draft London Plan are summarised below:

Policy	Comments
PV1 Brownfield first Opportunity Areas (BFOAs)	**General Comments:** Ealing supports a plan-led approach to Brownfield First Opportunity Areas, but PV1 and Annex E should demonstrate how their indicative housing and employment capacities have been assessed together. In Southall, the vision identifies substantial additional housing alongside a much smaller indicative jobs figure, industrial intensification and potential displacement of industrial land by data centres. The Plan should identify the industrial capacity and employment outcomes expected, the infrastructure and interventions required to deliver them, and how these assumptions have informed the housing capacity. An Opportunity Area vision should not be treated as evidence that otherwise unresolved conflicts between housing, industrial need and infrastructure have been overcome. Policy PV1 also fails to make any reference to ensuring the required infrastructure is planned for and funded through developer contributions from BFOA development. This policy should at least reference demonstrating compliance with MBUL 1, Clauses A3 & B5 in that sufficient infrastructure is provided for, if the policy is to be effective.
PV2	**General Comments:** We have no comments to make.

Policy	Comments
Central Activities Zone (CAZ)	
PV3 Town centres and high streets	**General Comments:** We welcome the flexibility for locally distinct town centre strategies and ask the Mayor to clarify that "surplus" commercial space must be assessed against the centre's planned economic role and the potential to refurbish or replace it. PV3 should expressly support a locally evidenced concentration of strategic office growth in a metropolitan centre, alongside housing and other uses, and recognise Article 4 directions that protect that role.
PV4 Strategic economic clusters and corridors	**General Comments:** Ealing welcomes the recognition of the WestTech Corridor in PV4, including its extension through Ealing. However, the policy should make clearer how this strategic economic role will be supported across town centres, designated industrial land and other employment locations, rather than leaving the corridor largely descriptive. In particular, the Plan should identify the importance of employment space, industrial capacity and infrastructure in realising the corridor's growth. Evidence should demonstrate how these requirements have been reconciled with the housing capacity and industrial land release proposed elsewhere in the Plan.
PV5 Industrial land supporting housing growth	**General Comments:** Ealing objects to PV5 in its present form. The policy seeks to translate a strategic estimate of housing capacity on industrial land into expectations for the release of particular areas without first demonstrating how industrial needs will be met or how the assumed housing will be delivered. Under PV5(A), land required for strategic and local industrial needs should be excluded from consideration for release. Paragraph 6.33 should not weaken that safeguard by treating modelled capacity elsewhere, including potential Green Belt provision, as an effective substitute before its location, suitability and delivery have been established. PV5(B) raises a separate and more immediate concern. Table 6.2 identifies the whole of The Vale and supports housing-led applications before its industrial designation has been reviewed through the local plan. The Mayor should explain how a policy identifying a particular parcel for this purpose is consistent with the statutory role of a spatial development strategy, which cannot allocate specific sites, and how its industrial and housing implications have been assessed.

Policy	Comments
	PV5 (C) should likewise require assessment of existing industrial use, local need and effects on neighbouring operations before housing is supported on undesignated industrial land. Consequentially, any housing capacity dependent on release that cannot be justified and delivered should be revisited. There is no evidence to justify the delivery of very substantial new areas of housing, and their necessary supporting infrastructure through piecemeal and speculative release through the development management process, that reference should be deleted as a whole from the policy. Without prejudice to the council's objection to PV5, any industrial release should be supported by an occupier-level impact assessment and a deliverable business retention and relocation approach. Suitable, affordable premises and necessary infrastructure should be available before displacement. The approach should address cumulative and piecemeal losses, including impacts on neighbouring businesses and the supply of older, lower-cost accommodation.
PV6 Metropolitan Open Land (MOL)	**General Comments:** Ealing recognises the importance of MOL in London, the need for its protection and that it is clearly distinct from Green Belt. We therefore support the greater clarity about their respective roles and functions in the draft plan. This also helps to remove potential ambiguities about the designation of grey belt introduced by the NPPF (August 2026). It is noted that Clause C (2) sets out those exceptional circumstances where MOL release is countenanced but notes that these 'may' include one of the following three clauses (i) to (iii). As currently drafted, this lacks clarity; It might be clearer if the policy simply sets out that exceptional circumstances need to be fully evidenced and justified, with examples of potential circumstances set out in the supporting text. We also support the acknowledgement that some MOL is not currently publicly accessible and that enabling development could help open up sites for broader and improved public access. While protecting good quality MOL, the policy should also provide some limited opportunities for land swaps, where this could improve the quality or quantum of MOL, while making the best use of well-connected land such as MOL adjacent to tube/train stations.
PV7 Sustainable development and	**General Comments:** Ealing broadly welcomes the more strategic approach to Green Belt release, aligning it with the national "grey belt" policy and identifying around 20% of London's Green Belt as potentially eligible for development.

Policy	Comments
enhancement of the Green Belt	We generally support the findings of the London-wide Green Belt Assessment (May 2026) and acknowledge the active collaboration and joint working on this evidence base report regarding parcels of land in Ealing. The study was undertaken by Land Use Consultants (LUC) who were jointly appointed by the GLA and the commissioning boroughs (including Ealing) to undertake the study and began work in February 2025. Whilst the work was primarily a technical exercise and desk-based, site visits were carried out in all 18 boroughs. These were to visit parcels where further investigation was required to conclude on rating assessments or following discussions with the borough. It concluded that all but one of the parcels that were assessed in Ealing do not meet the Green Belt purposes or 'tests' set out in national planning policy and these findings broadly concur with our separate assessment. Ealing appreciates that the detailed feedback we provided helped refine the detailed findings throughout the assessment and ensured consistency of approach. Ealing notes and acknowledges the report's findings that where land does meet grey belt criteria, this does not mean that it is therefore suitable for development. This will depend on a range of other factors. The national criteria are narrow and focused only on performance against certain Green Belt purposes, taking limited account of other planning considerations or land designations. For example, areas such as public parks could meet grey belt criteria, but this does not mean they represent suitable or sustainable locations for growth or that other material planning considerations should be overridden. It should be emphasised that Green Belt designation remains only one of many types of land use designation which may be applied to that same land given that it may also perform other functions or have other significance. This may relate to, for instance, its ecological, environmental, historic, cultural or amenity value or function. It is often the case that land designated as Green Belt also contain various other designations, reflecting an area with multifaceted significance. The findings of this assessment are therefore only related to the performance of the land against national Green Belt criteria – in accordance with national guidance and policy. Ealing also welcomes the fact that the findings do not include proposals or recommendations for land that might be suitable for development / release or make any proposals for adjustments to Green Belt boundaries or include any assessment of specific development or release proposals or make final conclusions in

Policy	Comments
	terms of whether land will constitute grey belt land. It will be the responsibility of Ealing LPA to undertake further studies and assessment to determine the final course of action, and we plan to do this as part of a review of our Local Plan. However, the strategic assessment will help inform our more detailed process of amending Green Belt boundaries in the future and provides a strategic direction for doing so. It must be acknowledged that there was no public engagement or consultation undertaken as part of the Green Belt assessment and this will enable the council to engage with its local communities and relevant stakeholders regarding any future proposals, including potential Green Belt release. It should also be noted that our residents who attended a Community Workshop on the Draft London Plan felt Green Belt development should be a last resort. However, whilst Ealing contributed to the London-wide Green Belt Assessment (May 2026), the council has <u>not</u> been involved in the preparation of the subsequent studies. Although the reports reference one another, they largely represent isolated outputs and the individual exercises and findings detailed in each do not necessarily flow from the other studies. Most importantly, the findings from these studies do not appear to have been a primary determinant of the overall growth strategy. This is a major concern. Our comments should therefore be read in conjunction with our detailed representations on “Broad Locations of Growth – Green Belt Industrial” under Policy MBUL1 above.
PV8 Strategic and local views	**<u>General Comments</u>:** We have no comments to make.

Annexes A-F:

This section deals with Ealing Council's representations on the annexes of the Draft London Plan and provides any detailed comments in the plan.

Policy	Comments
Annex A: Monitoring	**General Comments:** Table A1 in 'Annex A Monitoring' does not include any KPI metrics to review performance on delivering the social infrastructure (particularly health and education) and utilities infrastructure required to support good growth and the housing development that is being monitored. This seems like a significant blind spot in terms of monitoring to ensure good growth supported by the required infrastructure provision is being delivered.
Annex B: Town centre network	**General Comments:** See comments in response to Policy GLE4 in relation to the night-time economic activities and Policy PV3 in relation to the town centre network above.
Annex C: Green belt sustainable locations	**General Comments:** See comments in response to Policy MBUL1 under the heading 'Broad Locations of Growth – Green Belt Industrial' above.
Annex D: Transport interventions	**General Comments:** See comments in response to Policy MBUL1 under the heading 'Strategic infrastructure requirements,' Policy MBUL5 and Policy GLE9 above.
Annex E: Brownfield first opportunity areas strategic growth visions	**General Comments:** See comments in response to Policy PV1 above. In particular, Ealing is very concerned see that the indicative jobs targets for Southall have been downgraded to just 900 jobs compared to the current London Plan target of 3000 jobs. This further reinforces our concerns about the potential displacement of jobs arising from the flawed spatial strategy set out in Policy MBUL1.
Annex F: Public service infrastructure	**General Comments:** See comments in response to Policy MBUL1 under the heading 'Projected public service infrastructure requirements' above.
Annex G: Strategic industrial locations	**General Comments:** See comments in the Introduction and Key Messages (Paras 8-20) and in response to Policies MBUL1 and GLE2 above.