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Department: Planning

Our reference: LDF09/LDD16/LP01/HA01
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By email: BartonS@ealing.gov.uk
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Dear Steve,

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local
Development) (England) Regulations 2012**

Re: A New Local Plan for Ealing (Regulation 18) consultation.

Thank you for consulting the Mayor of London on the proposed New Local Plan for Ealing (Regulation 18) consultation. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have also provided comments, which I endorse, and which are attached at Annex 1.

This letter provides advice and sets out where you should make further amendments so that the draft Plan is consistent with the London Plan 2021 (LP2021). The LP2021 was formally published on the 2 March 2021, and now forms part of the London Borough of Ealing's (LBE's) Development Plan and contains the most up-to-date policies.

General

The draft Plan aligns itself with the Council's key priorities to tackle the climate crisis, to fight inequality and to create good jobs and growth. These objectives link well with the Mayor's Good Growth Objectives, especially GG6 increasing efficiency and resilience, GG5 growing a good economy and GG1 building strong and inclusive communities. The draft Plan is well structured and reasonably well aligned with the LP2021 in many areas, but there are a number of issues which we raise and for which we provide guidance; our key concern being LBE's proposed approach towards its Green Belt and Metropolitan Open Land.

At a spatial level the draft Plan divides the borough into seven key areas based on their individual characteristics to deliver the right types of growth in the right locations. The seven

areas are: Acton, Ealing, Greenford, Hanwell, Northolt, Perivale and Southall. These are described as the borough's seven towns.

Figure 2.2 provides some borough level context which is useful. It identifies key transport infrastructure such as the Elizabeth Line, key industrial areas and the OPDC area. It is noted that it illustrates a zone called the 'productivity arc', and there are several mentions of this throughout the draft Plan. There is little explanation, however, as to what the 'productivity arc' constitutes and more clarity on this would be welcomed.

Table 2.1 of the LP2021 identifies two Opportunity Areas (OAs) in LBE. These are the Southall OA and Old Oak Park Royal OA (for which there is now the established Old Oak and Park Royal Development Corporation (OPDC) to drive regeneration in the area). Both OAs are identified in the draft Plan which reflects the indicative figures for growth set out in Table 2.1 of the LP2021 for 9,000 homes and 3,000 jobs in Southall OA. This is welcomed.

While it is clear that the Plan will cover a 15-year period, it is not clear when this period will begin and end. It would be useful if this was set out. The difficulty in committing to a starting year is recognised, but doing so (even indicatively prior to the submission version of the Plan) would help LBE in aligning growth aspirations with their LP2021 housing target period, for example.

Housing

Policy SP4.3 of the draft Plan commits to meeting and exceeding the borough's ten-year housing target as set out in Table 4.1 of the LP2021 which is welcomed. This is for the delivery of 21,570 new homes for the period 2019-2029. It is noted that this is also reflected in the proposed Monitoring Framework.

The borough's housing target is comprised of a small sites component as set out in Table 4.2 of the LP2021 for the delivery of 4,240 (2019-2029), or an average of 424 new homes a year. LBE should follow the guidance set out in Policy H2 of the LP2021 which states that boroughs should pro-actively support housing from small sites by preparing site-specific briefs, masterplans and housing design codes in appropriate areas; by identifying and allocating small sites for residential development and the other approaches set out in part B of Policy H2. Ealing should also monitor their small sites housing delivery and include this in Table 1 of the proposed Monitoring Framework. The Mayor has published draft guidance to help boroughs to capitalise on the ability of small sites to contribute towards housing delivery. Small Sites Design Codes and Optimising Site Capacity: A Design Led Approach draft guidance can be found on the Mayor's web site¹.

The draft Plan does not set out what it intends to deliver in terms of housing beyond 2029. If a target is required beyond that year, LBE should follow the guidance set out in paragraph 4.1.11 of the LP2021, which makes it clear that boroughs should draw on the findings of the 2017 Strategic Housing Land Availability Assessment (SHLAA) and any local evidence of identified capacity and should take account of any additional capacity that could be delivered as a result of any committed transport infrastructure improvements and to roll forward the boroughs small sites housing target.

Affordable Housing

LBE reflect the Mayor's strategic target that 50% of all housing is to be affordable and Policy HOU makes it clear the intention to follow the Mayor's affordable housing threshold approach which is noted and welcomed.

¹ <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507>

LBE are proposing to set the threshold for applications to follow the fast track route (FTR) at 40%. This is higher than the Mayor's threshold level of 35% for residential development on privately owned land. It is noted that LBE have conducted a recent Strategic Housing Market Assessment, which establishes the borough's housing needs over the life of the Plan, but necessary viability evidence work has not yet been carried out. The Mayor would only be able to support the proposed higher threshold where it is underpinned by local and up-to-date viability evidence demonstrating that the proposed threshold is realistic and achievable for a variety of housing types, tenures and sizes across the borough. Such viability evidence should be developed ahead of the Regulation 19 consultation, so that stakeholders can make informed comments about LBE's intention to go above the threshold level in the LP2021.

Policy HOU should also apply a 50% threshold for residential proposals on publicly owned land and on industrial land where proposals would result in a net loss of industrial capacity and this should be made clear. The Policy should also set out that on publicly owned land, where there is an agreement with the Mayor to deliver at least 50% across the portfolio of sites, then a threshold level of 35% will apply to individual sites in accordance with paragraph 4.5.6 of the LP2021.

The tenure references in Policy HOU and Policy SP4.3 (and throughout the draft Plan) to 'affordable rent' should be amended to read 'social rent' or 'London Affordable Rent' to be consistent with LP2021 Policy H6 and to avoid confusion. These housing tenures are included in the LP2021 as two of the Mayor's preferred affordable housing tenures as set out in paragraph 4.6.3.

Industrial capacity

Policy E4 of the draft Plan seeks to maintain a sufficient supply of land for industry and logistics over the Plan period. It seeks to promote intensification and reuse, stating that there is no capacity for release of industrial space. This is generally positive and is welcomed but it does not establish LBE's industrial needs over the Plan period which should be the starting point from which LBE can strategically plan to manage its industrial capacity.

The Town Plans and Development Sites chapter of the draft Plan sets out numerous proposals for intensifying, reconfiguring or redeveloping industrial land and sites. The approach should be better co-ordinated and based on a clear understanding of the demand for industrial floorspace and underpinned by local and up-to-date evidence. LBE should follow the guidance set out in Policy E7 of the LP2021 and the Mayor's practice note on industrial intensification and co-location through Plan-led and masterplan approaches².

LBE's industrial evidence should quantify the amount and type of industrial uses which the borough needs in order to support the local and wider economy. The main sources of information on this are currently lacking or out of date. The West London Employment Review 2021/2022 update³ does not make a quantitative recommendation, citing a divergence between market evidence and employment forecasts. The Workplace Audit⁴ contains analysis and commentary which is helpful for context but does not quantify demand.

The draft Plan should set out how it is going to meet identified demand for industrial capacity and types based on the characteristics of each industrial area and locational suitability. Ealing's low industrial vacancy rate together with increasing industrial land values suggest a strong demand.

² https://www.london.gov.uk/sites/default/files/practice_note_-_industrial_intensification.pdf

³ https://www.ealing.gov.uk/downloads/download/6865/west_london_employment_land_review

⁴ https://www.ealing.gov.uk/downloads/download/6806/industrious_ealing_%E2%80%93_workspace_audit

While intensification is a good aspiration, the draft plan should acknowledge the need to continue to accommodate industries that are important locally or strategically, that may not lend themselves to intensification. The Workplace Audit cautions that "While intensification is needed, there is also a risk that a one-sided focus on higher density employment space would orientate the economy towards a different activity mix than what this study suggests the market may want to deliver"⁵.

Due to the number and scale of the proposed site allocations, which range from numerous smaller sites to more sizeable areas, including SIL, masterplanning should be done in a co-ordinated way rather than piecemeal. The draft Plan should set out a strategic framework for masterplanning the industrial site allocations to establish how LBE can reconfigure its industrial land to meet need. This should be accompanied by a monitoring framework. The intention should be to implement a plan, monitor, manage approach to be consistent with LP2021 Policy E4. It is important that the approach is one which is realistic and deliverable. It should be supported by viability evidence and/or clear indications that proposed industrial intensification and co-location can come forward as proposed. The framework should establish which areas are to be masterplanned and how this would contribute towards meeting identified need, by establishing the realistic gains that might be achieved if/and when redeveloped.

Among the site allocations are a significant number of functioning non-designated industrial sites. Some of them benefit from their proximity to the strategic road network and other positive characteristics which mean that they have greater value than other sites. LBE should employ a more judicious strategic approach so that those considered to be of higher industrial value are retained and/or intensified while lower value sites can be considered for alternative development. LBE could consider protecting the most valuable sites with appropriate industrial designations. This would reduce the risk of valuable non-designated industrial sites being lost to speculative development proposals while providing more certainty to occupants. In this respect, LBE should follow the guidance set out in Policy E7 part C of the LP2021.

Policy E4 of the draft Plan should note and reflect the correct approach to non-industrial development within non-designated industrial sites which is set out in LP2021 Policy E7 part C. This makes it clear that mixed-use or residential development proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has already been allocated in an adopted Plan, or industrial, storage or distribution floorspace is provided as part of mixed-use intensification. Paragraph 6.7.5 of the LP2021 establishes what evidence could be used to demonstrate 'no reasonable prospect' of non-designated sites being used for industrial and related purposes and this too should be followed. It is noted that Ealing are promoting a 'genuinely employment-led approach' to development within non-designated industrial areas but the Mayor would prefer one which was considered to be 'industrial use-led'. It is important to differentiate between both as the former includes office use, while the latter does not. The correct approach to follow, as highlighted, is set out in Policy E7 of the LP2021.

The Plan should make provision for emerging sectors. The West London Employment Land Review Update notes that industrial land is experiencing significant demand from new market entrants including film, data centres and delivery. These new and emerging sectors, including data centres and dark kitchens, should also be taken into account, as part of LBE's industrial evidence and in establishing LBE's industrial capacity requirements over the Plan period. Their potential impacts should also be taken into consideration.

⁵ Page 84, penultimate paragraph

We note that paragraph 4.2.41 proposes to downgrade the Hangar Lane Gyrotory Strategic Industrial Site (SIL) to Locally Significant Industrial Land (LSIS). The justification given is that changing its status would facilitate the reintroduction of industrial uses within the area subject to an agreed masterplan. SIL is the most valuable of industrial designations in London and LBE should be seeking to protect SIL capacity across the borough. In the absence of evidence establishing what LBE's industrial need is over the Plan period we do not know how much SIL capacity is required going forward. Plans for the future of the site should be part of a coordinated approach to meeting the boroughs needs for industrial capacity over the life of the Plan. The borough should provide more evidence to support the proposition that re-designation is required to resurrect industrial uses within the site. Future office development proposals should be directed to the borough's town centres as set out in Policy E1 of the LP2021.

To summarise, the Plan should establish industrial need and then a strategy for meeting it, by safeguarding and where appropriate reconfiguring and intensifying industrial land and capacity in the most suitable locations. GLA officers are happy to offer support to the borough on this.

Tall buildings

LBE's current proposed approach to tall buildings is complex. Policy D9 of the draft Plan divides the borough into 59 sub areas as set out in Figure DMP1, which each has an associated tall building definition, ranging between 6 (21m) and 21(73.5m) storeys in height. Out of those 59 areas, 12 have a proposed tall building definition that exceeds 6 storeys.

Figure DMP1 has some areas which overlap and there are other blank areas which have no corresponding tall building definition. In this respect the proposed approach doesn't meet the requirements of Policy D9 of the LP2021 and this should be addressed. Given that there are only five different proposed building heights cited in Table DMP1, this information could be conveyed in a much more simplified form which the Mayor would support.

As a matter of guidance, the Mayor would advise LBE to use a tall building definition which is based on a measurement taken from the ground level to the very top of the building. Assuming a floor to ceiling height of 3m, this would result in an overall height of 21m, for the purposes of the LP2021 definition of tall building. This clarity will help to avoid confusion in terms of determining planning applications and in providing guidance to prospective applicants.

The draft Plan does not clearly identify areas it considers suitable for tall buildings in a single map (or draft policies map). However, we do note that the site allocations set out if an area is considered to be 'potentially' appropriate for tall buildings and includes indicative building height ranges. The draft Plan could do this more effectively and commit to include this information as part of the borough's updated policies map. LBE have produced a Tall Building Strategy document which sets this out very clearly, so it would simply be a matter of transferring this information directly into the Local Plan document itself (and draft Policies Map), so that it is contained within a Development Plan Document as required by Policy D9 of the LP2021.

LBE's tall building approach should ensure that the Outstanding Universal Value (OUV) of Kew is preserved (including its setting and key views from within). Whilst outside the borough, the Kew World Heritage Site lies approximately 3km to the south of Ealing Town Centre and its protection remains a matter of strategic importance. Further testing should be undertaken to ensure that the locations and appropriate heights indicated in the proposed site allocations would not impact on the OUV of this heritage asset. LBE are advised to follow the guidance set out in Policies HC2 and HC3 of the LP2021.

Green Belt and Metropolitan Open Land

The Atlas of Change chapter of the draft Plan makes it clear that LBE are proposing significant changes to the borough's Green Belt (GB) and Metropolitan Open Land (MOL). What is proposed can be broken down into three elements:- redesignating GB to MOL; de-designating GB and MOL; and significant boundary changes to GB and MOL.

It seems to be LBE's intention to redesignate all of the boroughs GB land to MOL, as illustrated in Map 2 of the Atlas of Change. The borough's Green Belt and MOL Stage 1 Review makes clear the only rationale for this being that LBE is a borough not located on the outer edge of London. The Review goes on to say, that as there are substantial urban areas which lie between the borough's GB parcels and the outer edge of London, they do little to prevent urban sprawl thereby preventing the merging of neighbouring towns and cities. As such the corresponding assessments for the seven GB parcels are low.

The proposed approach raises several significant concerns. The council would need to demonstrate exceptional circumstances for the re-designations. The permanence of the Green Belt boundaries is supported in London Plan Policy G2 and NPPF paragraph 140. There are no clear benefits discernible as a result of redesignation and in doing so, it would result in a significant loss to London's GB. It should be noted that where a site performs weakly against some GB criteria, it still performs key GB functions in holding back urban sprawl, assisting in urban regeneration by encouraging the redevelopment of brownfield sites, and stopping towns from merging. We note that as part of its Local Plans Review, Hounslow attempted to do the same: redesignate some of its GB to MOL. In the Inspectors' Post Hearings Letter, it was concluded that 'the re-designation of Green Belt to MOL would neither be justified nor effective'. We strongly advise LBE not to proceed with plans for the redesignation of its GB to MOL.

LBE are also proposing to de-designate two parcels of GB and seven parcels of MOL. Some of the parcels have associated proposed site allocations but three of them do not. However, the proposed site allocations do not provide any detail on potential development capacities. In the absence of that information, it is not clear if LBE can meet the borough's growth needs over the lifetime of the Plan without relying on GB and MOL sites. It also means that one cannot determine what the GB and MOL sites could contribute in terms of housing numbers and other growth. In addition, we question the proposals to de-designate the three parcels mentioned earlier which are not included in site allocations. In this context, it is clear that LBE have not established the necessary exceptional circumstances required to justify the release of these sites.

Further, LBE is proposing numerous changes to GB and MOL boundaries. In total there are approximately 93 proposed. Policy G3 of the LP2021 sets out in part C that any alterations to the boundary of MOL should be undertaken through the Local Plan process and should only be done so in exceptional circumstances. The majority of proposed boundary alterations appear to be corrections or 'tidying up' and are relatively small and insignificant individually. Some of these will result in losses and some will result in net gains to both GB and MOL. However, LBE have not quantified what the overall effect of the proposed boundary changes would be. Such information is necessary going forward to enable assessment to be made of the impacts.

While some of the proposed boundary changes could be considered to be less significant, others cannot. Six large boundary changes are proposed which are set out in Table 1 below. Some of these changes are associated with proposed site allocations while three are not. LBE need to demonstrate exceptional circumstances to justify these proposed boundary changes.

Table 1 – Proposed boundary changes of significance

Parcel	Comments	Related Site allocation
GB2	Large boundary change to remove the Alec Reed Academy. Aside from educational buildings the area is largely comprised of pitches and playing fields.	None
GB5	This is a large area of publicly accessible green space for nearby residents.	GR10 – Smiths Farm and Allendale. This allocation is entirely within the Green Belt. The proposed use is for residential-led mixed use. An application for residential (189 dwellings) was refused in November 2022. This area is not proposed for de-designation/GB boundary change. NO12 – Yeading Lane II. The notes accompanying the allocation suggest there is potential to include adjacent Green Belt land which is part of parcel GB5 and has been identified for de-designation as a proposed boundary change.
MOL8	Proposed boundary change to remove Norwood Green Play Park and land north of Norwood Green Road.	None
MOL10	Removal of land at Our Lady of the Visitation RC Primary School	None
MOL12	Removal of land north of A40/Western Avenue	PE02 – Land on the South Side of Western Avenue. The site is currently designated as MOL. The proposed use is for residential. This land is proposed for removal from the MOL. PE04 – Alperton Lane South and Metroline Depot. The eastern part of the allocation is MOL. The proposed use is for industrial led mixed use intensification. This part of MOL12 is identified for removal through a proposed boundary change.
MOL15	Removal of Westway Shopping Centre and car park	GR08 – Westway Cross. A large part of the proposed allocation is MOL and this is reflected in the allocation. The proposed use is for retail and industrial with the retention of some parking for access to Paradise Fields.

The LP2021 sets out a strategic approach for all London boroughs without resorting to the capital’s valuable GB and MOL for development opportunities. If LBE’s proposed approach towards its GB and MOL is left unchanged at the time of the Regulation 19 Local Plan consultation the Mayor would be of the opinion that the draft Plan is not in general conformity with the LP2021. LBE should adopt a ‘brownfield first’ approach exhausting all brownfield development opportunities before considering the potential for development on GB and MOL sites.

GLA officers are keen to offer their continued support to LBE to consider alternative approaches to meeting their growth needs in the borough’s previously developed, brownfield areas for the duration of the Plan.

Transport

We welcome the promotion of 20-minute neighbourhoods across the borough and the emphasis on active travel improvements. It would be helpful to set this in the context of agreed targets for mode share and include a commitment to the Healthy Streets Approach and the Vision Zero road safety objective.

A number of site allocations require the re-provision of car parking. This is likely to be incompatible with the objectives of encouraging active travel and reducing car ownership and use and, therefore, needs to be clearly justified where any exceptions are made.

Carbon offsetting

The Mayor welcomes Ealing's ambition to make the borough net carbon neutral by 2030, which reflects his own plans for London to achieve net-zero by the same year. Ealing should note that in order to help boroughs reach net-zero the Mayor has published a number of London Plan Guidance and this should be used in the preparation of the Local Plan and should help to achieve the borough's carbon neutral target by 2030. This includes Be Seen Energy Monitoring, Circular Economy Statements, Energy Planning and Whole Life Carbon London Plan Guidance⁶.

Site allocations

The proposed site allocations would benefit from illustrating more clearly where significant designations are located, especially in relation to MOL, GB and industrial designations.

The site allocations would also benefit from indicative corresponding proposed capacity figures so that stakeholders can understand how sites will contribute towards meeting the boroughs growth needs over the life of the Plan.

It is noted that a number of the proposed allocations are small sites i.e. they are less than 0.25ha in size. This is welcomed. We encourage LBE to include as many small sites as possible as they will be a valuable source of the boroughs future housing supply. Where there are concentrated areas of small sites identified, LBE should consider developing design codes to promote more of this type of development in those areas.

Site/s	Comments
AC03– Acton Central Station Yard, AC05 – 83-85 Gunnersbury Lane, EA25 – West Ealing Station Approach, EA27 Access House & T Mohan, GR04 – Progress House & Garage, SO02 Park Avenue, SO03 Southall Sidings, SO11 Middlesex Business Centre, SO13 The Green	The site is home to non-designated industrial uses. It is noted that the site is part of a previously allocated one for mixed use development. LBE is advised to use Local Plan preparation as an opportunity to reconsider the proposed use so that it is consistent with Policy E7 part C of the LP2021. As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.
AC06 Ealing Common Depot, A09 – Acton Vale Industrial Park & Westgate House, EA22 Western Gateway 131-141 Broadway, EA26 – Castle House, EA32 – 96 Queens Drive & Telephone Service Centre, HA04 – Gray's Garage, HA09 – Access Storage, NO01 – Car Sales Site, NO11 – Telephone Exchange,	The site is home to non-designated industrial uses. In light of this the allocation should take into account Policy E7 part C of the LP2021. This sets out that mixed-use or residential proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted Local Plan or industrial, storage or distribution floorspace is provided as part of mixed use intensification. Existing industrial capacity on the site should be considered as part of a

⁶ <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507>

<p>SO04 Former Sorting Office & Kings Hall Methodist Church⁷, SO09 The Arches Business Centre, SO15 Scotts Road Trading Estate, SO17 Witley Works, SO18 Monorep Site, SO22 Car Sales, Queenstyle and MBS</p>	<p>plan-led approach towards meeting the borough's industrial needs over the Plan period.</p>
<p>AC07 – Builders Merchants Bollo Bridge Road, EA09 Ealing Studios, Ealing Green, EA36 – Wickes, South Ealing Road, EA37 – Travis Perkins, Popes Lane, HA10 – Tile Depot & Lambourn Close</p>	<p>The current use on this site can be considered to be non-designated industrial use. In light of this the allocation should take into account Policy E7 part C of the LP2021. This sets out that mixed-use or residential proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted Local Plan or industrial, storage or distribution floorspace is provided as part of mixed use intensification. Existing industrial capacity on the site should be considered as part of a plan-led approach towards meeting the borough's industrial needs over the Plan period.</p>
<p>AC10 - Haddon Court & Burghley Tower</p>	<p>Most of the proposed allocation lies entirely within MOL and is currently home to the Trinity Way housing estate and associated green space. As set out in policy G3 of the LP2021 MOL is afforded the same level of protection as Green Belt land. The proposed use is for a residential scheme which the Mayor considers would largely be inappropriate development in MOL. The site makes up a part of parcel MOL23 which is identified for de-designation as MOL and evidence to demonstrate exceptional circumstances will be required.</p>
<p>Acton – AC12 Acton Crossrail Station and Sidings</p>	<p>The proposed allocation is home to a waste site. In accordance with LP2021 Policy SI 9 waste plans should be adopted before considering the loss of a waste site. If the waste use on this site is to be lost, this would only be considered acceptable where appropriate compensatory capacity is provided at, or above, the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost. The guidance set out in paragraph 9.9.2 of the LP2021 should be followed.</p>
<p>GR03 – Stanhope Primary School & Education Centre</p>	<p>The southernmost part of the allocation lies within MOL and is currently home to a primary school and early years education centre. As set out in Policy G3 of the LP2021, MOL is afforded the same level of protection as Green Belt land. The proposed use is for residential uses and re-provision of the school and education centre. If the residential element of the proposal is within the MOL the Mayor would consider this to be inappropriate development in MOL.</p>
<p>GR08 - Westway Cross</p>	<p>The existing use is a retail park and a large part of the site lies within MOL. As set out in Policy G3 of the LP2021, MOL is afforded the same level of protection as Green Belt land. The proposed use is for new industrial and retail capacity which the Mayor considers is inappropriate development in MOL. However, LBE are proposing a MOL boundary change which would remove the designation and this will require evidence to demonstrate exceptional circumstances.</p>
<p>GR10 - Smiths Farm and Allendale</p>	<p>The proposed allocation lies completely within MOL and is currently home to non-designated industrial uses and a car dealership. As set out in Policy G3 of the LP2021 MOL is afforded the same level of protection as Green Belt land. The proposed use is for a residential-led, mixed-use scheme which the Mayor considers is inappropriate development in MOL.</p>

⁷ The allocation incorrectly states that the site is part of an existing site allocation and should be amended.

NO04 - Islip Manor Housing Estate	A large part of the site which makes up Prior's Field is designated Green Belt and lies in parcel GB3. In Policy G2 of the LP2021 it is clear that the Green Belt should be protected from inappropriate development. The proposed use is for residential development which the Mayor considers is inappropriate development in the Green Belt. LBE should therefore revise the allocation boundary to remove that part which is Green Belt.
NO06 – Northolt Driving Range	The site lies completely within the Green Belt and has most recently been used as a sports facility with a golf driving range. In Policy G2 of the LP2021 it is clear that the Green Belt should be protected from inappropriate development. The proposed use is for an open space-led scheme which is very vague. As such, it is difficult for the Mayor to consider whether this is inappropriate development in the Green Belt. LBE should be much clearer about the intended proposed use.
NO15 - West London Shooting Ground	The site is currently entirely Green Belt and is home to the West London Shooting Grounds and Down Barns Farm. The proposed use is for 'open space-led' development which is vague. As such, it is difficult for the Mayor to consider whether this is inappropriate development in the Green Belt. LBE should be much clearer about the intended proposed use.
HA02 – Car Sales, Hanwell Bridge	The site is currently designated as MOL and is currently home to a car dealership. As set out in Policy G3 of the LP2021, MOL is afforded the same level of protection as Green Belt land. The proposed use is for residential development which the Mayor considers is inappropriate development in MOL.
PE02 – Land on the South Side of Western Avenue	The proposed allocation lies completely within MOL and is currently home to vacant storage land and an advertising hoarding. As set out in Policy G3 of the LP2021, MOL is afforded the same level of protection as Green Belt land. The proposed use is for residential development which the Mayor considers is inappropriate development in MOL.
PE03 – Alperton Lane North	This site is part of the Northolt, Greenford and Perivale SIL. LBE should note that as set out in Part C of LP2021 Policy E5 development proposals within SILs should only be for those industrial activities listed in Part A of Policy E4. If it is Ealing's intention to introduce non-industrial uses within the SIL, the guidance set out in Policy E7 of the LP2021 should be followed, which makes it clear in Part B that industrial intensification can be used to facilitate the consolidation of an identified SIL to support the delivery of residential and other uses. Policy E7 also makes it clear that co-location of industrial and non-industrial uses cannot happen in SIL. To be clear, where the intention is to introduce non-industrial uses within the SIL, at least part of the site would need to be downgraded to LSIS or de-designated entirely, through the approach set out in the LP2021, and only where the borough's industrial land needs could still be met over the plan period. The co-location of industrial and non-industrial uses cannot happen within SIL to be consistent with the LP2021. The approach should be part of a plan-led one to deliver the borough's industrial land needs over the Plan period
PE04 – Alperton Lane South and Metroline Depot	The western part of the allocation lies within Northolt, Greenford and Perivale SIL. LBE should note that as set out in Part C of LP2021 Policy E5 development proposals within SILs should only be for those industrial activities listed in Part A of Policy E4. If it is Ealing's intention to introduce non-industrial uses within the SIL the guidance set out in Policy E7 of the LP2021 should be followed, which makes it clear in Part B that industrial intensification can be used to facilitate the consolidation of an identified SIL to support the delivery of residential and other uses. Policy E7 also makes it clear that co-location of industrial and non-industrial uses cannot happen in SIL. To be clear, where the intention is to

	<p>introduce non-industrial uses within the SIL, at least part of the site would need to be downgraded to LSIS or de-designated entirely, through the approach set out in the LP2021, and only where the borough's industrial land needs could still be met over the plan period. The co-location of industrial and non-industrial uses cannot happen within SIL to be consistent with the LP2021. The approach should be part of a plan-led one to deliver the borough's industrial land needs over the Plan period.</p> <p>The eastern part of the site lies within MOL. As set out in policy G3 of the LP2021 MOL is afforded the same level of protection as Green Belt land. The proposed use is for industrial-led mixed-use intensification which the Mayor considers is inappropriate development in MOL. This part of MOL12 is identified for removal from MOL through a proposed boundary change and evidence to support exceptional circumstances is required</p>
SO16 Endsleigh Industrial Estate	<p>The site is home to non-designated industrial uses. In light of this the allocation should take into account Policy E7 part C of the LP2021. This sets out that mixed-use or residential proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted Local Plan or industrial, storage or distribution floorspace is provided as part of mixed use intensification. It is noted that the site was granted planning permission in 2019 for residential use. If you find you need this site as part of a wider strategy to meet your industrial needs, you should consider its allocation in order to provide industrial capacity should the extant planning permission lapse.</p>
SO20 Great Western Triangle Centre	<p>The allocation lies completely within the Great Western SIL. LBE should note that as set out in Part C of LP2021 Policy E5 development proposals within SILs should only be for those industrial activities listed in Part A of Policy E4. If it is LBE's intention to introduce non-industrial uses within the SIL the guidance set out in Policy E7 of the LP2021 should be followed, which makes it clear in Part B that industrial intensification can be used to facilitate the consolidation of an identified SIL to support the delivery of residential and other uses. Policy E7 also makes it clear that co-location of industrial and non-industrial uses cannot happen in SIL. To be clear, where the intention is to introduce non-industrial uses within the SIL, at least part of the site would need to be downgraded to LSIS or de-designated entirely, through the approach set out in the LP2021, and only where the borough's industrial land needs could still be met over the plan period. The co-location of industrial and non-industrial uses cannot happen within SIL to be consistent with the LP2021. The approach should be part of a plan-led one to deliver the borough's industrial land needs over the Plan period.</p>
SO21 Hanson's Timber Yard and Motec	<p>The proposed allocation lies completely within MOL and is currently home to a timber yard and builder's merchant. As set out in Policy G3 of the LP2021 MOL is afforded the same level of protection as Green Belt land. The proposed use is for residential development and community open space. The Mayor considers that the proposed residential element would be inappropriate development in MOL.</p>
SO24 Cranleigh Gardens & Kingsbridge Crescent	<p>The site is home to non-designated industrial uses. In light of this the allocation should take into account Policy E7 part C of the LP2021. This sets out that mixed-use or residential proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted Local Plan or industrial, storage or distribution floorspace is provided as part of mixed use intensification. The site was granted planning permission in 2020 for residential use. If you find you need this site as part of a wider strategy to meet your</p>

	<p>industrial needs, you should consider its allocation in order to provide industrial capacity should the extant planning permission lapse.</p>
EA 28 - Gurnell Leisure Centre	<p>The proposed allocation lies completely within MOL and is currently home to a leisure centre. As set out in Policy G3 of the LP2021 MOL is afforded the same level of protection as Green Belt land. The proposed use is for a leisure-led scheme with enabling residential use and improved access to open space. The Mayor largely considers this would be inappropriate development in MOL.</p>
EA34 – Old Actonians Sports Ground	<p>The proposed allocation lies entirely within MOL and is currently home to the Old Actonians Sports Ground. As set out in Policy G3 of the LP2021 MOL is afforded the same level of protection as Green Belt land. The proposed use is for a residential scheme (with retention of green space) with the Riding School either re-accommodated on site or reprovided elsewhere in the borough which the Mayor considers would be inappropriate development in MOL. The site makes up parcel MOL18 which is identified for de-designation as MOL and evidence to support exceptional circumstances is required.</p>
EA31 - Former Barclays Sports Ground	<p>The allocation is entirely MOL and makes up a part of parcel MOL20. It is currently a playing field. As set out in Policy G3 of the LP2021 MOL is afforded the same level of protection as Green Belt land. The proposed use is for a leisure-led scheme with enabling residential use which the Mayor considers would be inappropriate development in MOL. MOL20 is identified for de-designation as MOL and evidence to support exceptional circumstances is required</p>

Next steps

I hope these comments help to inform the preparation of LBE's Local Plan. We continue to offer our support to work with you to address the issues identified in this letter and to ensure it aligns more closely with the LP2021, as well as delivering the Council's objectives. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact Hassan Ahmed on 020 7983 4000 or at hassan.ahmed@london.gov.uk.

Yours sincerely,



Lucinda Turner

Assistant Director of Planning & Regeneration

Cc: Dr Onkar Sahota, London Assembly Constituency Member
Sakina Sheikh, Chair of London Assembly Planning Committee
National Planning Casework Unit, DLUHC



Annex 1 – Transport for London Response

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08/02/2023

Consultation on the Regulation 18 Ealing Local Plan

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL Transport Trading Limited Properties (TTLP) (formerly TfL Commercial Development) to reflect TfL's interests as a landowner and potential developer.

Thank you for giving Transport for London (TfL) the opportunity to comment on the Regulation 18 version of the Ealing Local Plan.

The London Plan was published in March 2021. Local Plan policies and site allocations should be developed in line with relevant London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy (MTS). In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

We note that the approach of Ealing's Local Plan is not to repeat London Plan policies as they already form part of the statutory development plan for the area. It may be helpful to make this point explicit in the introduction to the Development Management Policies section by stating that London Plan policies will be the basis for decision-making where there are no detailed policies, eg on issues such as safeguarding and protection of transport land, transport assessments, car and cycle parking, deliveries and servicing and construction logistics.

We welcome the promotion of 20 minute neighbourhoods across the borough and the emphasis on active travel improvements. It would be helpful to set this in the context of agreed targets for mode share and include a commitment to the Healthy Streets Approach and the Vision Zero road safety objective.

A number of site allocations require the re-provision of car parking. This is likely to be incompatible with the objectives of encouraging active travel and reducing car ownership and use and, therefore, needs to be clearly justified where any exceptions are made.

Our comments on specific modifications and suggestions for amendments or wording improvements are detailed in appendix A below.

Yours faithfully,



Josephine Vos | Manager

London Plan and Planning Obligations team | City Planning

Email: josephinevos@tfl.gov.uk



Appendix A: Specific suggested edits and comments from TfL on the Draft Ealing Local Plan

Policy	Track change/comment – Reg. 18
SP1	<p>We support part C which states that</p> <p>‘By promoting 20-minute neighbourhoods across the borough, where most daily needs can be met within a short walk or cycle, Ealing will become a cleaner, greener and more sustainable borough. Firm action will be taken on climate change to protect the boroughs future, there will also be a range of measures to foster civic pride and belonging, promote thriving communities and spread the benefits of access to modern infrastructure.’</p>



<p>SP2</p>	<p>We support SP2.2 Climate Action part A which proposes</p> <p>‘Making the best use of land and investing in sustainable connectivity by:</p> <ul style="list-style-type: none"> (i) Supporting the principles of the 20-minute neighbourhood by investing in places in which most of people’s daily needs can be met within a short walk or cycle, with ease of access to public transport. (ii) Enhancing active travel networks that connect each of these hubs and surrounding communities via high quality pedestrian and cycle routes that combine with strategic green and blue infrastructure (parkland and waterways). (iii) Encouraging appropriate meanwhile uses in multi-phased schemes particularly for employment uses on vacant industrial land and premises. (iv) Reducing the number of motorised vehicles travelling in and through Ealing. (v) Increasing the sustainability of the logistics network in light of the introduction of the Ultra-Low Emission Zone.’ <p>Although this approach is in accordance with the London Plan, it would be helpful in part (iv) to set out the agreed mode share target for sustainable transport of 76% by 2041 (an increase from 63% in 2021) which sets out the scale of the challenge in reducing car travel.</p> <p>Explicit support should also be given to car free development which will be necessary to reduce car ownership and use, and to achieve mode share targets. This should be included within SP2 (or SP4 – see below) and reflected in the individual Town Plan sections.</p> <p>We support part ii and encourage you to endorse the Strategic Cycling Analysis (SCA), TfL’s data-led framework for planning the strategic cycling network which identifies cycling connections with the greatest potential to contribute to cycling growth in London. We have used this along with the Strategic Walking Analysis (SWA)—which identifies pedestrian severance and priority walking locations—to assess the active travel routes proposed in the individual Town Plans in chapter 4 of the Local Plan.</p> <p>Overall, the individual Town Plan proposals have responded to the SCA in terms of identifying major and minor active travel routes, and we strongly welcome this. In cases where the spatial strategies do not align with the SCA, we would recommend using the SCA to identify and categorise further active travel routes for each area (see comments under each of the individual Town Plans for a detailed breakdown). As well as this, we would expect the Local Plan active travel proposals to respond to other TfL strategic data, taking into account strategic safety, walking and bus data.</p>
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Policy	Track change/comment – Reg. 18
	<p>It is important to note that the connections identified in the SCA are not intended to refer to specific roads, so proposals for new cycle routes along these corridors could use main roads, quiet side roads, or a mix of these approaches. The London Cycling Design Standards and TfL’s Cycling Quality Criteria will be important so that new cycle routes both meet the required quality for cycle routes in London, and are compliant with the national LTN 1/20 guidance.</p>
SP3	<p>We support SP3.3 Healthy Lives part A ‘Improving air quality and tackling congestion to improve respiratory health’ and part B ‘Implementing 20-minute neighbourhood principles which encourage active travel, improve social mixing, and provide essential services such as access to healthy food.’</p> <p>Although these actions are in accordance with the London Plan, it would be helpful in part A to clarify that ‘reducing car use and supporting car free development’ is an essential precondition to ‘tackling congestion’. This would ensure consistency with SP2.2A(iv). It would also be helpful in part B to include a commitment to adopting the Healthy Streets Approach and Vision Zero because the design of Healthy Streets and reducing road danger are important contributors to Healthy Lives.</p>



Policy	Track change/comment – Reg. 18
SP4	<p>We support SP4.1 Good Growth part A which proposes ‘Directing development to sustainable locations that are well connected to sustainable transport modes or within close proximity to town centres, and thus deliver patterns of land use that reduce the reliance on the car and facilitate making shorter and regular trips by walking and cycling.’</p> <p>Although this approach is in accordance with the London Plan, explicit support should also be given to car free development which will be necessary in order to reduce car ownership and use, and to achieve mode share targets. This should be included within SP4 (or SP2 – see above) and reflected in the individual Town Plan sections</p> <p>We also support SP4.1 Good Growth part F which proposes</p> <p>‘Making provision for necessary physical, social and green infrastructure by:</p> <p>(i) Delivering strategic infrastructure that enhances both east-west and north-south connectivity including supporting proposals for the West London Orbital (WLO) maximising the catalytic potential benefits of the Elizabeth Line stations and future High Speed 2 (HS2) station; and working with neighbouring authorities to promote cross-boundary infrastructure improvements where relevant.’</p> <p>Although this approach is in accordance with the London Plan, we would also expect an explicit mention of protection for existing active travel and public transport infrastructure in line with Policy T3 of the London Plan. This should include operational rail infrastructure, bus stops and stands, drivers facilities, bus stations and bus garages. Bus infrastructure that needs protecting is identified for each Neighbourhood below.</p> <p>We look forward to providing input to the Infrastructure Delivery Plan and reviewing the framework for planning obligations. The framework should reflect London Plan priorities in Policy DF1D, including necessary public transport improvements.</p>



Policy	Track change/comment – Reg. 18
3.37/ Figure SS3	<p>The wording of the first sentence implies that the Elizabeth line is one of the planned and proposed public infrastructure projects. The full service will operate from May 2023 and so it may be better to refer to maximising the benefits of the Elizabeth line stations in line with wording in Policy SP4 part F.</p> <p>We note a reference to the ‘Brentford to Southall line’, although it is not explicitly mentioned in Policy SP4.1 part F. The introduction of passenger services along this rail line is strongly supported by Hounslow Council in their Local Plan. To make clear Ealing Council’s support it may be helpful to show the route indicatively on the key diagram.</p> <p>While we welcome inclusion of West London Orbital, it would make sense to also show the existing North London line routes towards Willesden Junction and Stratford (branching off at Old Oak Common Lane station) and Richmond (branching off south of South Acton station). Other existing lines are already shown.</p>
Figure A1	<p>The Dudding Hill line that would be used by West London Orbital services (the western branch north of Old Oak Common Lane station) and Old Oak Common Lane station itself are shown – in fact the line is currently freight only and the station is not existing or committed, so should not be included here.</p>



Policy	Track change/comment – Reg. 18
Figure A2	<p>Under the heading of ‘Proposed Transport and Active Travel Links’ it would be helpful to include the route of the proposed West London Orbital (WLO) on this map. For consistency, as the WLO route to the north is shown as part of the Overground, the WLO route to the south between South Acton towards Kew and Brentford should also be shown in orange. This is different to how the WLO is presented in Figure SS3 which does include the route to the south but not to the north (see comment above).</p> <p>We encourage you to identify active travel routes in a way that is consistent with TfL’s Strategic Cycling Analysis: The east-west top cycling potential corridor identified in the SCA has been identified as a major active travel route which is welcomed.</p> <p>The north-south high cycling potential identified in the SCA is mapped as a major active travel route, however, it is classified as a minor active travel route along Gunnersbury Lane despite being a high cycling potential corridor in the SCA. This should be amended.</p> <p>C49 has not been included in the map and should be added.</p>



Policy	Track change/comment – Reg. 18
A1- Acton Spatial Strategy	<p>We welcome proposals to focus growth around rail stations. Developments that will benefit from improved connectivity or capacity, including the West London Orbital and North Acton station improvements, should be required to provide contributions towards their delivery and implementation.</p> <p>We also support active travel interventions in part J although in part viii it should be noted that wildlife corridors may not be appropriate alongside all railway routes for operational reasons or on unused sites where there is development potential.</p> <p>Bus infrastructure (stands, stations and drivers’ facilities) that needs to be retained and enhanced includes: North Acton, Victoria Road and Victoria Road south side – stand and rail replacement stand Park Royal, Coronation Road East Acton, Telford Way East Acton, Brunel Road East Acton Goldsmith Arms East Acton Lane, The Vale Acton Vale, Bromyard Avenue Acton, Horn Lane east side and west side Acton, Town Hall Acton, Old Town Hall Acton Green, South Parade and South Parade south side</p>
4.1.24	The reference to a proposed West London Orbital station at Acton Town should be corrected to refer to Acton Central
A6 – North Acton and Park Royal	This policy should more explicitly refer to the need to upgrade North Acton station to facilitate and enable the long term development aspirations for the area. It would also be helpful both to confirm the Council’s intention to work with TfL and OPDC to deliver North Acton station improvements, including step free access, and to require contributions from developments that will benefit from improved station access and capacity.



Policy	Track change/comment – Reg. 18
AC06 – Ealing Common Depot	We expect any redevelopment to take account of London Plan Policy T3. This policy provides protection for operational transport infrastructure, and is supplemented by London Plan guidance on Sustainable Transport, Walking and Cycling. TTLP will provide a separate response for this site.
AC08 – Salisbury Street Car Park and Neville Close	The Notes state ‘Will need to consider reprovision of existing car parking spaces.’ However, no justification is provided. A requirement to re-provide car parking at current levels may be inconsistent with Policy T6(F) of the London Plan which requires that ‘Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.’ The site has a PTAL of 3/4 and any re-provision of car parking will need to take this into account.
AC12 – Acton Crossrail Station and Sidings	We expect any redevelopment to consider the proximity to rail infrastructure, including the safeguarding provision for the Elizabeth line (Crossrail Safeguarding Directions). Proposals need to take account of London Plan Policy T3 which requires the protection of operational transport infrastructure. This policy is supplemented by London Plan guidance on Sustainable Transport, Walking and Cycling. TTLP will provide a separate response for this site.
Figure E1	Consistent with our comment on Figure A1 above, the existing context should not show a London Overground route via the Dudding Hill line.



Policy	Track change/comment – Reg. 18
Figure E2	<p>Consistent with our comment on Figure A2 above, under the heading of ‘Proposed Transport and Active Travel Links’ it would be helpful to include the route of the proposed West London Orbital (WLO) on this map. For consistency, as the WLO route to the north is shown as part of the Overground, the WLO route to the south between South Acton towards Kew and Brentford should also be shown in orange. This is different to how the WLO is presented in Figure SS3 which does include the route to the south but not to the north (see comment above).</p> <p>We support identification of the following active travel routes in a way that is consistent with TfL’s Strategic Cycling Analysis:</p> <p>The east-west top cycling potential corridor identified in the SCA has been identified as a major active travel route.</p> <p>The high cycling potential corridor between Ealing Broadway to South Ealing identified in the SCA has been mapped as a major active travel route.</p> <p>The high cycling potential corridor in the SCA has been mapped between Pitshangar Lane and Ealing Broadway with an alternate alignment.</p> <p>North of Pitshangar Lane through Pitshangar Park has medium cycling potential in the SCA and mapped as a major active travel route.</p> <p>The medium east-west cycling potential corridor from Pitshangar Lane towards Greenford in the SCA is mapped as a minor active travel route.</p>



Policy	Track change/comment – Reg. 18
E1 – Ealing Spatial Strategy	<p>Bus infrastructure (stands, stations and drivers’ facilities) that needs to be retained and enhanced includes:</p> <ul style="list-style-type: none"> Ealing, Scotch Common Ealing, Courtfield Gardens Ealing Common, Warwick Dene West Ealing, Mattock Lane Boston Manor Road – rail replacement stand
EA04 – Ealing Broadway Station	<p>We would expect any redevelopment to consider the proximity to rail infrastructure including the safeguarding provision for the Elizabeth line (Crossrail Safeguarding Directions). Development proposals will need to reflect London Plan Policy T3 which provides protection for operational transport infrastructure and the emerging London Planning Guidance on Sustainable Transport, Walking and Cycling. TTLP will provide a separate response for this site.</p>
EA05 – Central Chambers	<p>We expect any redevelopment to consider the proximity to rail infrastructure including the safeguarding provision for the Elizabeth line (Crossrail Safeguarding Directions).</p>
EA06 – Haven Green Car Park	<p>We welcome redevelopment of car parking for alternative uses. We expect any redevelopment to consider the proximity to rail infrastructure including the safeguarding provision for the Elizabeth line (Crossrail Safeguarding Directions).</p>
EA24 – Waitrose, West Ealing	<p>Although the site includes a surface car park. any redevelopment (both for residential and retail) should be car free in line with Policy T6, T6.1 and T6.3 of the London Plan. Network Rail has an existing access route across the site which could be included in the site constraints section.</p>
EA27 - Access House & T Mohan, West Ealing	<p>The landing point of the Jacobs Ladder footbridge is on this site. Improvements are proposed to Jacobs Ladder as part of the West Ealing Liveable Neighbourhood (WELN) project although funding for implementation still needs to be secured. Development on this site should facilitate any WELN improvements, providing appropriate contributions and ensure a high quality public realm around the bridge landing point.</p>



Policy	Track change/comment – Reg. 18
EA32 - 96 Queens Drive & Telephone Service Centre	The site is bounded on two sides by rail lines and so any redevelopment will need to take into account the proximity to rail infrastructure.
Figure G2	<p>We support identification of the following active travel routes in a way that is consistent with TfL’s Strategic Cycling Analysis:</p> <p>The east-west medium cycling potential in the SCA is mapped as a major active travel route through Greenford.</p> <p>The medium north-south cycling potential corridor identified in the SCA from Greenford towards Southall is mapped as a major active travel route.</p>
G1 – Greenford Spatial Strategy	Bus infrastructure (stands, stations and drivers’ facilities) that needs to be retained and enhanced includes: Greenford, Red Lion
4.3.55	This states that ‘Recent improvements at the busy Greenford Road/Ruislip Road junction have improved the flow of traffic but there is scope to further improve congestion in the area, including addressing the congestion caused by the right turn of buses from Windmill Lane onto Ruislip Road.’ TfL is willing to consider positive suggestions to address this issue that do not impose additional operational costs for buses or impact negatively on operational efficiency.
GR08 – Westway Cross	The Proposed Use is stated as ‘Retail and Industrial and retention of some parking for access to Paradise Fields’. It is not clear why parking should be required for access to Paradise Fields. Although parking spaces for disabled visitors may be required, general car parking is unlikely to be justified for access to this outdoor leisure space. Promotion of active travel would be more appropriate.



Policy	Track change/comment – Reg. 18
Figure H2	<p>We support identification of the following active travel routes in a way that is consistent with TfL’s Strategic Cycling Analysis:</p> <p>The east-west top cycling corridor identified in the SCA is mapped as a major active travel route.</p> <p>The north-south high cycling potential identified in the SCA from Hanwell towards Boston Manor is mapped as a major active travel route.</p> <p>The north-south medium cycling potential identified in the SCA from Hanwell towards Greenford is mapped as major active route.</p>
H1 – Hanwell Spatial Strategy	<p>Bus infrastructure (stands, stations and drivers’ facilities) that needs to be retained and enhanced includes:</p> <ul style="list-style-type: none"> Ealing Hospital, Uxbridge Road Ealing Hospital Grounds Boston Manor Road – rail replacement stand
HA01 – Ealing Hospital	<p>The Proposed Use is stated as ‘Residential and re-provide car parking for hospital’ A requirement to re-provide car parking at current levels is likely to be inconsistent with Policy T6(F) of the London Plan which requires that ‘Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.’ Although there are no specific standards for hospitals set out in the London Plan, we would expect that any re-provision of car parking would have to be justified on the basis of operational requirements or special needs eg disabled persons’ parking.</p>



Policy	Track change/comment – Reg. 18
Figure N2	<p>We encourage you to identify active travel routes in a way that is consistent with TfL’s Strategic Cycling Analysis:</p> <p>The C link through Marnham Fields and Willow Tree Open Space is not marked and should be added to the map.</p> <p>The medium connection from Hayes Town (outside borough) towards Northolt Park identified in the SCA is mapped as a major active travel route which is welcomed.</p> <p>While the medium cycling connection identified in the SCA from Northolt towards the C link is mapped as a minor active travel link, the medium link identified in the SCA from Ruislip (outside the borough) towards White Hart Roundabout, is mapped as a major active travel route and extended towards the C link. It would be helpful to amend this to be consistent with the SCA.</p> <p>There is no active travel route proposed in the spatial strategy between Northolt and Eastcote which the SCA identified as having medium cycling potential and should be added to the map.</p>



Policy	Track change/comment – Reg. 18
<p>N1 – Northolt Spatial Strategy</p>	<p>Over the Local Plan period we will continue to work in partnership with Ealing Council to address the sustainable transport issues raised in the Northolt Town Plan, such as improving north-south connectivity and reducing the A40 and A312 severance. These issues are currently being addressed through the Levelling Up Fund Northolt project. Additionally, we are working jointly with Ealing officers on the Northolt Transport Study, which is a piece of strategic transport modelling work that assesses the transport impact of Northolt development to 2040. This study will help understand what transport infrastructure interventions will be required to support good growth in Northolt. The Northolt Transport Study is being supported by a Northolt Local Connections Study that is being led by TfL Urban Design team, the outcome of which will be a prioritised list of walking and cycling interventions for Northolt. The Northolt Transport Study and Local Connections Study will provide the evidence base for securing sustainable transport contributions from developments in the areas that will benefit from the improvements.</p> <p>It would be helpful to confirm the Council’s intention to work with TfL both to deliver Northolt station improvements, including step free access, and to require contributions from developments that will benefit from improved station access and capacity.</p> <p>Bus infrastructure (stands, stations and drivers’ facilities) that needs to be retained and enhanced includes:</p> <ul style="list-style-type: none"> Smiths Farm, Hotspur Road Northolt, Islip Manor Estate Northolt Station Wood End, Lilian Board Way
<p>NO01 – Car Sales Site</p>	<p>The Proposed Use is stated as ‘Residential-led, mixed-use scheme with some employment/retail space at lower levels and re-provision of car parking space’. A requirement to re-provide car parking at current levels is likely to be inconsistent with Policy T6(F) of the London Plan which requires that ‘Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.’ The site has a PTAL of 4 and any re-provision of car parking will need to take this into account. Although parking spaces for disabled users of the leisure centre will be needed, general car parking is unlikely to be justified. Promotion of active travel would be more appropriate.</p>



Policy	Track change/comment – Reg. 18
NO07 – White Hart roundabout	Any redevelopment of the site will need to provide improved facilities for pedestrians and cyclists given its importance as a crossing point. TTLP will provide a separate response for this site.
Figure P2	<p>We would encourage you to identify active travel routes in a way that is consistent with TfL’s Strategic Cycling Analysis:</p> <p>The C link is not marked and should be added to the map.</p> <p>The north-south medium cycling potential corridor identified in the SCA going through Perivale is mapped as a major active travel route which is welcomed.</p>
P1 – Perivale Spatial Strategy	<p>Bus infrastructure (stands, stations and drivers’ facilities) that needs to be retained and enhanced includes:</p> <p>Perivale, Tesco</p> <p>Perivale, Medway Estate</p> <p>Perivale Bus Garage bus stand (2 locations)</p>
PE04 – Alperton Lane South and Metroline Depot	This site includes an operational bus depot, and in line with Policy T3 of the London Plan and London Plan guidance on Sustainable Transport, Walking and Cycling, the Proposed Use should make it clear that the bus garage must be retained as part of any redevelopment and that the present garage capacity must be maintained or increased to accommodate zero-emission buses and refuelling/charging infrastructure as well as future demand for bus garage space.
Figure S2	<p>We would encourage you to identify active travel routes in a way that is consistent with TfL’s Strategic Cycling Analysis:</p> <p>The east-west top cycling route in the SCA has been mapped as a major active travel route which is welcomed.</p> <p>The north-south medium corridor identified in the SCA from Southall down to Hounslow (outside the borough) has been captured as a major active travel route which is welcomed, however there are no proposed active travel routes for the medium north-south connection linking Greenford to Norwood Green, west of Southall, that was identified in the SCA and should be added to the map.</p>



Policy	Track change/comment – Reg. 18
S1 – Southall Spatial Strategy	Bus infrastructure (stands, stations and drivers’ facilities) that needs to be retained and enhanced includes: Southall, Delamare Road Southall Town Hall Southall Park, Uxbridge Road
SO01 – Southall Crossrail Station Gurdwara	We expect any redevelopment to consider the proximity to rail infrastructure, including the safeguarding provision for the Elizabeth line (Crossrail Safeguarding Directions).
SO02 – Park Avenue	We expect any redevelopment to consider the proximity to rail infrastructure, including the safeguarding provision for the Elizabeth line (Crossrail Safeguarding Directions).
SO03 – Southall Sidings	We expect any redevelopment to consider the proximity to rail infrastructure, including the safeguarding provision for the Elizabeth line (Crossrail Safeguarding Directions). TTLP will provide a separate response for this site.
SO11 – Middlesex Business Centre	The existing planning consent for this site includes a road that will facilitate both improved connectivity for active travel and through access for buses. The principle of providing bus access and improved active travel connectivity should be reflected in any amended proposals for the site.
SO13 -The Green	The Proposed Use is stated as ‘Residential, flexible commercial, employment and community floorspace, parking’. A requirement to re-provide car parking at current levels is likely to be inconsistent with Policy T6(F) of the London Plan which requires that ‘Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.’ Although the recently approved planning application (215058FULR3) included car parking, this was not supported by TfL. The site has a PTAL of 4 and any re-provision of car parking will need to take this into account.

