




Image: Acton Gardens, Acton Town.

# DEVELOPMENT MANAGEMENT POLICIES



  
**DEVELOPMENT PROPOSALS  
SHOULD IDENTIFY THE  
POSITIVE ASPECTS OF THE  
SITE AND ITS SURROUNDINGS  
FROM THE OUTSET.**



**Image above:** Uxbridge  
Road, Ealing Town Centre.

## Introduction

5.1 — This section of the plan sets out the development management policies that will provide the standards and guidelines that planning applications will need to comply with to support the delivery of the Local Plan. These are organised by policy topic areas that respond specifically to and complement Chapters 3 to 10 in the London Plan (2021) (Design; Housing; Social Infrastructure; Sustainable Infrastructure; Economy; Heritage and Culture; Green Infrastructure and Natural Environment; and Transport).

5.2 — Ealing’s development management policies take two forms:

- Local variations to the London Plan (2021), which append new text to those London Plan policies and should be read alongside them.
- New policies which can be read independently but which also sit within Ealing’s broader development plan which includes the London Plan (2021).

5.3 — Where a policy name includes both letters and numbers it is a local variation to a London Plan (2021) policy, where it uses letters alone this is a new standalone Ealing Local Plan policy.



**Image:** Green and Open space supporting new development in the borough.

## Policy DAA: Design and Amenity – Ealing LPA – local policy

New development must achieve a high quality of environment in itself and also in its effect upon its neighbours and surroundings. This should take a sequential approach of first achieving a high level of amenity through design, and then mitigating any adverse impacts. In particular, development should ensure:

- (i) protection of sensitive uses within or outside the development;
- (ii) high quality design;
- (iii) good levels of daylight and sunlight;
- (iv) good levels of privacy; and
- (v) positive visual impact.



**Image:** Old fire station and the stables, Ealing.

5.4 — Ealing’s local development targets for the delivery of housing, economic growth, community facilities and greenspace are ambitious, and form an important part of London’s overall development needs. The corollary of this is that development must also contribute to its surroundings as well as benefiting from Ealing’s appeal and existing assets, ensuring high-quality environment both within the redline of the development and also the surrounding areas.

5.5 — Adverse impacts will typically include, but are not limited to; noise, vibration, particulate matter, odour, traffic generation, overheating, artificial light and reflected light.



Image: Ealing residents.

5.6 — Sensitive uses will typically include, but are not limited to; residential, certain business uses, schools, hospitals, public open space, and nature sites. Residential uses in particular should be treated as places of retreat and are unusual in also being inhabited at night. Protection of these uses should not result in their being isolated from their surroundings as this may in and of itself represent an erosion of their amenity.

5.7 — High quality design is that which successfully resolves otherwise competing needs of the scheme and its surroundings. This includes coherent development of the site so that the scheme as a whole is physically accessible and visually legible regardless of whether development has occurred at different times, and an appropriate level of development that complements the local context, including relevant policy designations, in massing and the extent of site coverage. Good design also means the use of high-quality materials and components, and that extensions to existing buildings ensure that the new development as a whole meets current design standards.

5.8 — Good levels of daylight or sunlight are levels that are appropriate to the uses proposed for internal rooms and external spaces within the curtilage of the building.

5.9 — Good levels of privacy are levels which are appropriate to the use type concerned. For example,

residential accommodation should normally be expected not to suffer direct overlooking of internal spaces. External spaces within the curtilage of a building, however, including private gardens, will typically be subject to some overlooking and consequent limitations to privacy.

5.10 — Positive visual impact is an impact that is attractive, and that complements local character and value. This may be a positive intervention for change where there is currently poor environmental quality or weak character, or simply a strengthening of existing character where this is already pronounced and of high quality. Development proposals should identify the positive aspects of the site and its surroundings from the outset using the Ealing Character Study and where relevant conservation area appraisals and management plans. Design statements should demonstrate an understanding of these aspects and show clearly how the development responds to them.

5.11 — All forms of development will benefit from a design review process. Ealing operates a Design Review Panel and a Community Review Panel and major applications in particular should be referred to these for advice. Applicants are also encouraged to ensure meaningful consultation at an early stage in the process and demonstrate how this has contributed to the evolution of the scheme.

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

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

F. Tall buildings above defined thresholds are exceptional and should be located upon specified Development Sites defined in the Development Plan.

G. The tall buildings threshold height is simply that and not a presumption that any height up to this is automatically acceptable.

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

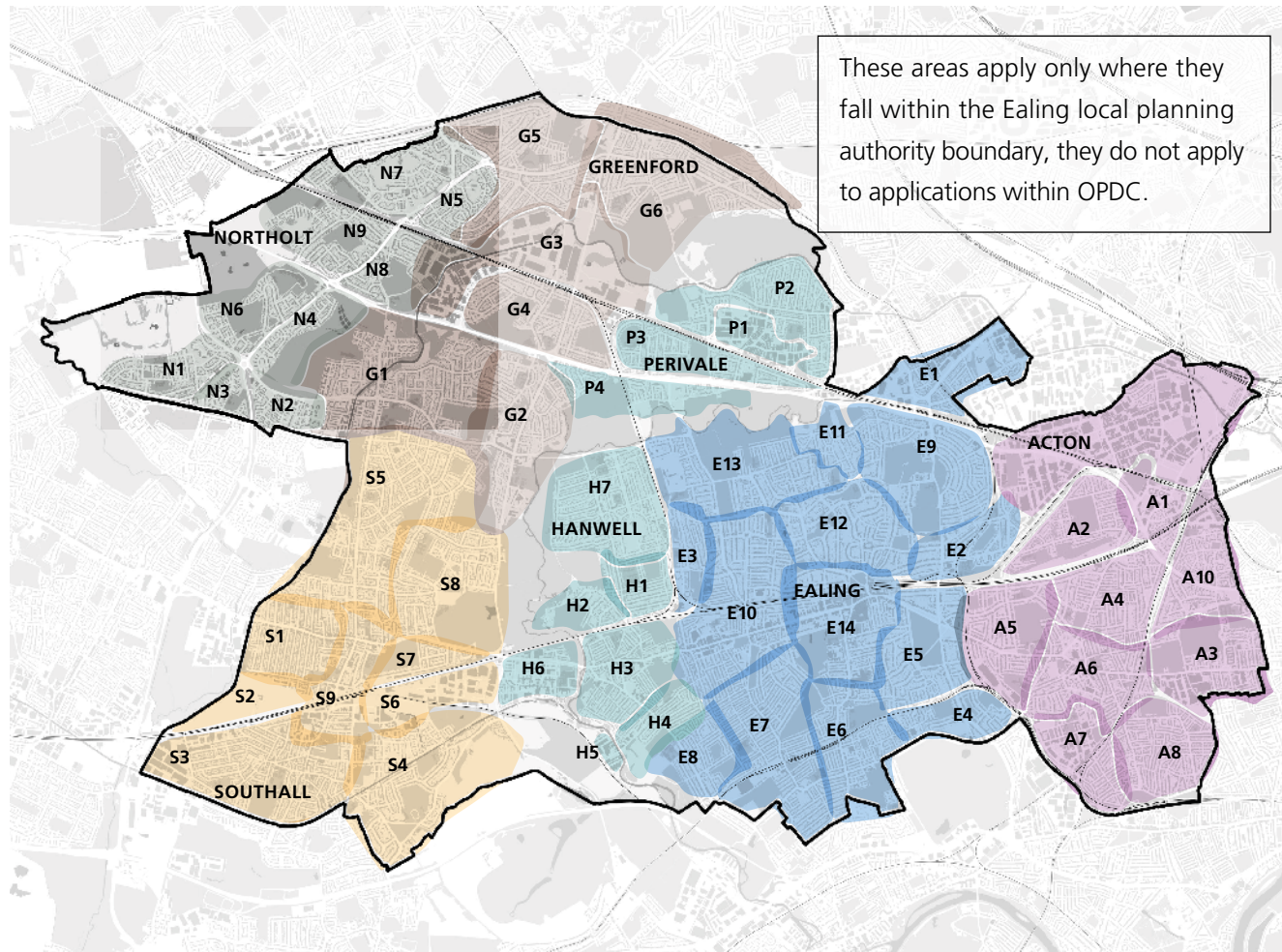
5.12 — The definition of a tall building in different areas of the borough is based upon rigorous assessment of local character and prevailing heights in metres as follows (storey heights are shown in the table):

5.13 — The primary purpose of strategic growth policies and development management policy is to deliver character-led and contextual growth across the Borough. This strongly accords with the strategic lead

**Table DMP1:**  
Definition of Tall Buildings

Town	Area	Tall Building (m)	Storeys	Town	Area	Tall Building (m)	Storeys	Town	Area	Tall Building (m)	Storeys
<b>Acton</b>	A1	31.5	9	<b>Greenford</b>	G1	21	6	<b>Southall</b>	S1	21	6
	A2	49	14		G2	21	6		S2	21	6
	A3	24.5	7		G3	21	6		S3	21	6
	A4	49	14		G4	21	6		S4	21	6
	A5	24.5	7		G5	21	6		S5	21	6
	A6	28	8		G6	21	6		S6	24.5	7
	A7	28	8	<b>Perivale</b>	P1	21	6		S7	21	6
	A8	21	6		P2	21	6		S8	21	6
	A9	21	6		P3	21	6		S9	21	6
	A10	21	6		P4	21	6	<b>Hanwell</b>	H1	21	6
<b>Ealing</b>	E1	24.5	7	<b>Northolt</b>	N1	21	6		H2	21	6
	E2	21	6		N2	21	6		H3	21	6
	E3	21	6		N3	21	6		H4	21	6
	E4	21	6		N4	21	6		H5	21	6
	E5	21	6		N5	21	6		H6	31.5	9
	E6	21	6		N6	21	6		H7	21	6
	E7	21	6		N7	21	6				
	E8	21	6		N8	21	6				
	E9	21	6		N9	21	6				
	E10	24.5	7								
	E11	21	6								
	E12	21	6								
	E13	21	6								
	E14	73.5	21								

**Figure DMP1:**  
Areas



of the London Plan which sets the clear presumption that tall buildings should be confined to specified sites and maximum heights.

5.14 — Ealing’s tall buildings policy builds upon comprehensive evidence developed inline with the requirements set out in the London Plan. This evidence analyses the suitability and sensitivity of different part of the Borough and then sets specified locations and heights that may be suitable in principle for tall buildings. In certain cases, such as designated industrial sites, sensitivity is set out by this baseline but suitability for tall buildings may not currently be known. Where the acceptability of tall buildings is not established by the plan, as on industrial sites, applications which include tall buildings will be subject to comprehensive masterplanning in co-operation with the council.

5.15 — All sites that may be appropriate for tall buildings are identified in Development Sites (or site allocations) appended to each of the Town Plans in Chapter 4. Heights listed in Development Sites are the product of detailed design assessment, nevertheless they remain subject to a full design assessment at the point of application against the impact policies set out in London Plan Policy D9 C.

## Policy HOU: Affordable Housing – Ealing LPA – local policy

A. Affordable housing contributions must address identified needs in Ealing and will be based upon:

(i) A strategic target of 50% as set out by the London Plan.

(ii) A split of 70% low-cost rented at social rent levels to 30% intermediate provision.

(iii) An appropriate mix of tenures and unit sizes.

B. Development should meet identified local needs for tenure and mix.

C. The Fast Track route, set out in Policy H5 B 1) of the London Plan, in Ealing will only apply to schemes providing at least 40% affordable

housing and a tenure split of 70% social rent and 30% intermediate. This requirement also applies to Build to Rent developments.

D. Provision should normally be made on site, and units secured in perpetuity for affordable use.

E. Affordable housing contributions from large scale purpose built shared living (PBSL) should be in the form of conventional housing units on site and should meet a minimum 40% contribution.

F. For purpose built student accommodation (PBSA) to follow the Fast Track Route set out in Policy H15 4) a) of the London Plan at least 40% of the accommodation must be secured as affordable student accommodation.

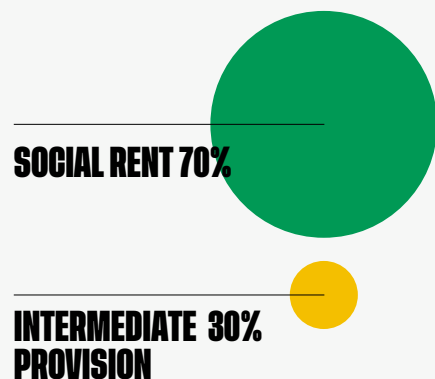


**Image:** Affordable homes, Acton Gardens residential development, Acton.



5.16 — Like most London boroughs, Ealing faces an acute affordable housing need, particularly for social rent homes. Part A sets out a strategic target of achieving 50%, consistent with the London Plan. A higher threshold to that in Policy H5 B 1) in the London Plan is set out in Part C to better address the borough’s identified need. The tenure split of 70% social rent and 30% intermediate accommodation is consistent with the requirements of the London Plan and applies to the relevant thresholds for each site (either 40% or 50%). Given the identified need for social rent accommodation this tenure split also applies to Build to Rent schemes.

**EALING LPA: COMPARATIVE PERCENTAGES OF GENUINELY AFFORDABLE TENURES**



5.17 — Identified needs are those set out by the local planning authority in its housing evidence, particularly in the most recent Strategic Housing Market Assessment (SHMA). These are defined as a specific number of units for people in particular income brackets and the objective of the plan is to deliver against this need unit-by-unit in order to meet need and deliver mixed and inclusive communities.

5.18 — The appropriate mix of tenures and unit sizes is that set out in Ealing’s Local Planning Policy Guidance based upon up to date evidence of identified needs. This also provides guidance on specialist forms of housing such as co-living and houses of multiple occupation (HMOs) that may make a valuable contribution to housing supply in particular circumstances but will not be generally acceptable across the Borough.

5.19 — Offsite provision will be acceptable only in limited circumstances where it best meets the requirement to deliver against identified needs, for example where smaller schemes would result in delivery of a small number of units that are unattractive to registered providers.

5.20 — Ealing’s Local Housing Needs Assessment (LHNA) found that need for PBSL and PBSA could not be demonstrated at a strategic level and so any schemes must be justified on a case by case basis with reference to specific local needs and the impact upon the broader housing market of any proposed provision. Similarly, these constitute discrete housing products not part of conventional housing supply. For PBSL any affordable contribution should be in the form of conventional affordable units that can contribute to Ealing’s identified housing needs.

5.21 — While the London Plan supports a cash in lieu contribution for PBSL, more recent guidance has acknowledged that onsite affordable housing can be supported, particularly given the London Plan’s strong preference for onsite affordable provision and the proliferation of PBSL schemes. Onsite conventional affordable housing is favoured above a cash in lieu contribution given the acute need for affordable homes in the borough and the need for each site to contribute to meeting that need and this should be equivalent to at least 40% (or 50% where that threshold applies).

5.22 — Applications for PBSA will only be supported where the accommodation is meeting the needs of higher education institutions in the borough or in directly neighbouring boroughs. This will be evidenced through the accommodation either being directly operated by the relevant institutions or nominations agreements for the majority of the rooms in place for those institutions. To be consistent with the other thresholds in this plan and recognising that cost of accommodation can often be a barrier for those from lower income families from accessing further education in London, 40% of the rooms should be affordable.

**Policy H16: Large Scale Purpose Built Shared Living – London Plan – Ealing LPA – local variation**

B. Development of large-scale shared living will only be permitted within Ealing Metropolitan Town Centre and will only be supported where it can be demonstrated that the scheme would:

- (i) not compromise the supply of class C3 self-contained homes;
- (ii) not result in an overconcentration of similar uses; and
- (iii) not be detrimental to local amenity and the mix and cohesiveness of community uses in the area.

5.23 — There are no identified local needs for shared living in Ealing, and so development must be justified on a case by case basis. Whether in the form of completely new build or the conversion of existing buildings large-scale shared living depends for the amenity of its residents upon access to excellent public transport connections and a wide range of local amenities. Within the borough this type of development is therefore directed to Ealing Metropolitan Town Centre.

5.24 — Proposals will only be supported where they do not compromise the supply of self-contained homes and given the need for affordable housing, as set out in local Policy HOU E, affordable housing should be delivered on site as conventional affordable housing.

5.25 — Given the high density and nature of PBSL, they can have particular impacts on their surrounding community in terms of noise, privacy, and stress on existing infrastructure. To ensure that PBSL does not have a negative impact on the amenity of the existing community, development proposals are required to pay particular regard to the potential impacts of the proposal, the cumulative impacts of the proposal alongside other consented development in the surrounding area, on neighbouring amenity.



**THERE ARE NO IDENTIFIED LOCAL NEEDS FOR SHARED LIVING IN EALING, AND SO DEVELOPMENT MUST BE JUSTIFIED ON A CASE BY CASE BASIS.**



**Image:** Young people and students need affordable places to live.

## Policy SSC: Small Sites Contribution – Ealing LPA – local policy

Ealing will seek affordable housing contributions from all housing development. On small sites this will be as follows:

- (i) On sites of 5 – 9 dwellings a financial contribution equivalent to 20% affordable provision; and
- (ii) On sites of 1 – 4 dwellings a financial contribution equivalent to 10% affordable provision.

5.26 — Small sites constitute an inherent part of Ealing’s housing capacity and delivery target as set out in the London Plan, and also provide different types of housing in parts of the borough that might otherwise see little new supply. It is important that these sites contribute to defined local needs in type and tenure. Ealing’s affordable housing needs also considerably exceed the London Plan strategic target of 50% and it is therefore appropriate for small sites also to contribute to affordable provision.



**Image:** Residential development in Ealing town centre.



## **AFFORDABLE WORKSPACE HELPS ENSURE THAT A RANGE OF ECONOMIC, SOCIAL AND CULTURAL USES, INCLUDING START UP AND MOVE ON SPACE IS AVAILABLE IN THE BOROUGH.**



**Image:** Local food vendor at a street market.

### **Policy E3: Affordable Workspace London Plan – Ealing LPA – local variation**

F. Affordable workspace in Ealing will be provided on the basis of a levy on development of 10% of gross floor area in mixed use schemes, and 5% of net floorspace in office and industrial schemes. Where that levy would result in affordable provision of at least 1000sqm of mixed-use space, 2000sqm of office space, or 3000sqm of industrial space, then provision should be onsite. Where the total space provided by development is less than these thresholds then provision should be by means of offsite contributions.

G. Where affordable workspace is to be provided onsite then development should be supported by a business plan that demonstrates the viability and suitability of the space for its intended occupants, the optimisation of the site for this use and of the development overall, and appropriate management of the space for the duration of its use as affordable space.

H. Affordable workspace will be provided at 80% discount for a period of 15 years. Where an offsite contribution is calculated it should be on the basis of the level of provision (5% or 10% of total development size) multiplied by the value of an 80% reduction in rent for 15 years.



Image: Dickens Yard, Ealing.

5.27 — Affordable workspace requirements are set out in the Affordable Workspace Study and serve defined needs which have a broader social or economic benefit to the borough and to do so in a way that makes best use of this resource. Best practice across London and specific viability evidence in Ealing shows that achieving a critical mass of space is essential to that meeting the needs of businesses and forming the best use of resources.

5.28 — Affordable workspace helps ensure that a range of economic, social and cultural uses, including start up and move on space is available in the borough. This Local Plan has been drafted following covid and while London as whole continues to adjust to what this means for office need and requirements in particular as well as a time of general economic uncertainty. Given this and, that compared to central London, Ealing’s employment space is relatively affordable and that the Local Plan seeks to distribute employment opportunities across its seven towns, weight should be given to the need to deliver our employment land use requirements and the wider regeneration benefits of employment led development proposals. The requirements for affordable workspace should be used as a starting point for negotiation within this context.

### **Policy E4: Land for Industry, Logistics and Services to Support London's Economic Function – London Plan – Ealing LPA – local variation**

H. To deliver and maintain a sufficient supply of land for industry, logistics and economic services over the plan period:

(i) Industrial intensification and reuse will be the primary consideration on industrial land and on the site of any existing employment use in Ealing. There is no identified capacity for release of industrial space in Ealing over the plan period.

(ii) Industrial sites will be managed according to the following hierarchy of designations:

a) Strategic Industrial Location (SIL) – will accommodate only conforming uses.

b) Locally Significant Industrial Sites (LSIS) – receives the same level of protection as SIL, but may be acceptable for mixed intensification subject to an agreed masterplan.

c) Non-designated sites in industrial use – will follow a sequential approach to test reprovision of pure industrial uses, then a mix of uses from most industrial provision to least, before any release is permitted.

I. Where housing is delivered as part of policy compliant mixed-intensification then the affordable housing capacity of the site will be calculated based on its constrained value, i.e., based upon a scheme that first offers the maximum practicable industrial provision.

5.29 — Ealing has a finite supply of industrial land with which to meet industrial need, and this is set against a background of continuing loss of smaller historical industrial sites. Ealing's Employment Land Review shows a clear need for existing land to be maintained and repurposed to meet substantial industrial growth forecast across West London. There is no presumption of release for any site presently in industrial use, in particular, designated sites will not be released other than through the plan making process.

5.30 — Where any non-designated site becomes available for redevelopment it must follow a genuinely employment-led approach to development which consists of testing the site first for its suitability for conforming industrial uses and then, if necessary, to a sequential test that establishes the optimum quantity of non-industrial use necessary to enable industrial provision according to local need. Full release from industrial use is a last resort and must be shown to be the only viable development option.



**Image:** Aerial view of North Acton Industrial Estate.

5.31 — Conforming uses are defined in London Plan Policy E4 and include mainly pure industrial and logistics uses, and some sui generis uses primarily related to vehicle maintenance. Conforming uses do not include trade counters or any other retail or leisure-driven use. Designated sites are managed specifically to the exclusion of non-conforming uses and permissions for new uses within Class E will specify which industrial sub-uses will be permitted. The terms ‘industrial uses’ and ‘employment uses’ are generally used interchangeably, however, for the purposes of this policy both mean defined conforming uses.



**INDUSTRIAL NEEDS  
REMAIN THE PRIMARY  
CONSIDERATION ON  
DESIGNATED LSIS  
WITHIN EALING.**

## Policy E6: Locally Significant Industrial Sites (LSIS) – London Plan – Ealing LPA – local variation

B. Industrial needs remain the primary consideration on designated LSIS within Ealing and individual applications on these sites will continue to be determined according to the same principles as SIL.

C. Conforming uses with high employment density and economic value will be prioritised on LSIS.

D. Mixed intensification may be suitable on LSIS in cases where a masterplan is agreed with Ealing according to the following principles:

(i) It extends to the full boundary of the LSIS.

(ii) It meets objectively assessed industrial needs.

(iii) It achieves a high quality of built environment and delivers any necessary supporting infrastructure, affordable housing, and affordable workspace contributions.



**Image:** Aerial view of North Acton Industrial Estate.



5.32 — LSIS has been identified along with town centres as being essential to improving job quality and earnings in Ealing and applications on LSIS should therefore be supported by a comprehensive economic strategy demonstrating how they will help to deliver the council's economic growth strategy. High employment density and economic value uses are those conforming uses that also make a substantial contribution to the borough's employment and economic objectives.

5.33 — Mixed intensification offers the opportunity for significant industrial and housing uplift as well as improvements to quality of place, and economic and employment benefits for Ealing. Mixed intensification also has important potential to diversify and modernise Ealing's industrial provision particularly for smaller industrial uses. However, there is no presumption in favour of mixed-intensification and not all industrial uses will be able to be accommodated as part of mixed development.

5.34 — In line with the requirements of the London Plan, any proposals for mixed intensification must be brought forward through a masterplan process that is led by the industrial needs of the area, and which fully addresses the placemaking and infrastructure needs of the new development.



**Image:** Brompton Bikes factory, Greenford Quays.

## Policy G4: Open Space – London Plan – Ealing LPA – local variation

C. Development proposals on green and open space should:

(i) Be led by the purposes of nature conservation, recreation and climate change mitigation. The size of development within green and open spaces and its impact upon visual openness must be kept to a minimum.

(ii) Preserve and enhance the visual openness of green and open spaces particularly with regard to views to, from, within, and across these areas.

5.35 — Green and open space within Ealing includes, but is not limited to: Green Belt, Metropolitan Open Land, Public Open Space, Community Open Space, Green Corridor, Blue Ribbon Network, and Sites of Importance for Nature Conservation.

5.36 — The Atlas of Change sets out in detail the proposed changes to the Green Belt and Metropolitan Open Land across the borough.



Image: Northala Fields, Northolt.

### Policy G5: Urban Greening – London Plan – Ealing LPA – local variation

D. Ealing will apply the Urban Greening Factor as set out in the London Plan with a target of 0.4 for residential development and 0.3 for commercial development.

5.37 — The Urban Greening Factor requirements draw on the advice set out in the London Plan, they form an important part of Ealing’s design, biodiversity and climate change strategy and should form an integral part of the design process.



Image: The Green in Ealing.

### Policy G6: Biodiversity and Access To Nature London Plan – Ealing LPA – local variation

F. Development proposals should achieve a biodiversity net gain of at least 20% or the advised national minimum amount, whichever is greater, as follows:

- (i) Biodiversity net gain will be calculated using up-to-date national calculation methodology and should normally be provided on-site.
- (ii) Offsite provision may be considered where this can provide greater gains and impact.
- (iii) Any offsite provision should fall within the London Borough of Ealing boundary, and as close to the site as possible, and be guided by any potential improvement opportunities which have been identified in individual Town Plans.
- (iv) Provision must be consistent with the Local Nature Recovery Strategy.

5.38 — Biodiversity Net Gain (BNG) is an approach to development that aims to leave the natural environment in a measurably better state than it was beforehand.

5.39 — BNG does not change existing protections (both legal and policy based) and operates in addition to the mitigation hierarchy.

5.40 — This policy is intended to build from the provisions covered through mandatory net gain, which establishes a baseline level of performance.

5.41 — BNG will be measured using Defra’s latest biodiversity metric. The metric calculates what net gain has been achieved and ensures that there is measurably more biodiversity after a development. It uses habitats as a proxy to determine biodiversity value and translates this into a unit score. Additionally, the created habitats will need to be secured and monitored for at least 30 years.

5.42 — The biodiversity net gain approach embeds a spatial hierarchy into habitat delivery, where there is a preference for onsite or local enhancements. Exceptions to this hierarchy will only be considered where it can be shown that offsite provision can secure substantially greater gains over the available on-site enhancement opportunities.

5.43 — Opportunities for targeting net gain (on-site or off-site) are detailed in chapter 4, and in due course will be identified within a Local Nature Recovery Strategy (LNRS) which is due to be completed in 2025. The Greater London Authority is responsible for preparing a LNRS for London which Ealing will input into.

### **Policy S5: Sports and Recreation Facilities – London Plan – Ealing LPA – local variation**

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E. Development should ensure sufficient quality of sports provision in line with Ealing's Sports Facilities Strategy. Loss of existing sports facilities will not be supported, unless it forms part of the strategy to improve the quality or range of overall provision.

F. Affordable community access to new sporting provision should be secured wherever possible, particularly in the case of education uses.

5.44 — Sports facilities include all indoor or built provision, and also any existing fields or external spaces, which are in active use or identified as being in use for sporting activities.

5.45 — Ealing's Sports Facilities Strategy and current Sport England guidance emphasise that provision of sports facilities is primarily a consideration of the quality of provision relative to its usage, rather than capitated provision targets. As a result, sufficient provision of sports facilities must be evaluated against the current context of needs and provision at the time of application.

5.46 — On-site provision will not normally be sought in developments of less than 300 residential units, but must in all cases form the best type of provision based upon current needs.

5.47 — Quality should be assessed by reference to Sport England guidance, or local Ealing guidance, where that is available.



**DEVELOPMENT SHOULD ENSURE SUFFICIENT QUALITY OF SPORTS PROVISION IN LINE WITH EALING'S SPORTS FACILITIES STRATEGY.**



**Image:** New sporting provision should be secured.

### Policy OEP: Operational Energy Performance –Ealing LPA –local policy

New dwellings or 500 sqm or more of non-residential GIA should be designed and built to be Net Zero Carbon in operation. Including:

- (i) Predictive energy modelling to demonstrate compliance with the Space Heating Demand and Energy Use Intensity targets in Tables DMP2 and DMP3.
- (ii) Achieving an ‘Energy Balance’, or where this is not technically feasible, paying for any shortfall through the council’s offset fund.
- (iii) Minimising the ‘Performance Gap’ through an assured performance method of assessment.

5.48 — Predictive energy modelling involves the creation of a building model which is sufficiently accurate and detailed to represent the proposed building itself, which can then be used to reliably predict the future buildings behaviour. This is distinct from compliance modelling which is based on a notional building, which may differ from the actual proposed building design.

Predictive energy modelling can be used to reliably estimate energy use and to drive suitable design and construction decisions. For domestic buildings, the PHPP methodology and excel based tool have been shown to predict energy use much more accurately than the current version of SAP a tool designed for the purpose of part L Compliance calculation. For non domestic buildings, predictive energy modelling using the methodology set out in CIBSE Technical Memorandum 54 (TM54) allows estimation of the operational energy for all end uses of a building. IESVE, TAS and PHPP are three energy modelling packages that can be used at present to carry out TM54 assessments.

5.49 — An Energy Balance is when sufficient energy is generated on site to match the total predicted needs of the building. To achieve an Energy Balance the amount of energy generated in a year should match or exceed the predicted annual energy demand of the building, i.e., Renewable energy generation (kWh/m2/yr) = or > EUI (kWh/m2/yr).

5.50 — The space heating demand is the amount of heat energy needed to heat a building over a year and is expressed in kWh/m2/yr. It is a measure of the thermal efficiency of the building elements.

**Table DMP2:**  
Targets for Space Heating Demand

Buildings should achieve a space heating demand of less than:

▼ Building type	▼ Space heating demand (kWh/m2GIA/yr)
All buildings	less than 15 kWh/m2GIA/yr

5.51 — Energy Use Intensity (EUI) is the total energy needed to run a home over a year (per sqm). It is a measure of the total energy consumption of the building (kWh/m2/yr). The EUI of a building covers all energy uses: space heating, domestic hot water, ventilation, lighting, cooking and appliances.

**Table DMP3:**  
Targets for Energy Use Intensity (EUI)

Buildings should achieve an Energy Use Intensity (EUI) of no more than the following (where technically feasible) by building type or nearest equivalent:

▼ Building type	▼ EUI (kWh/m <sup>2</sup> GIA/yr)
All dwellings	35 kWh/m <sup>2</sup> GIA/yr or less
Student/keyworker accommodation, care homes	35 kWh/m <sup>2</sup> GIA/yr or less
Warehouses and light industrial units	35 kWh/m <sup>2</sup> GIA/yr or less
Schools	65 kWh/m <sup>2</sup> GIA/yr or less
Offices, Retail, HE Teaching facilities, GP surgeries	70 kWh/m <sup>2</sup> GIA/yr or less
Hotels	160 kWh/m <sup>2</sup> GIA/yr or less

5.52 — The space heating demand and energy use intensity targets set out in Tables DMP2 and DMP3 will be kept under review informed by the monitored performance of developments, and accounting for emerging research and evidence. Any updated targets will be published separately.


5.53 — New buildings cannot continue to burn fossil fuels for heating if Ealing is to stay within carbon budgets. Low carbon heat is therefore an essential component of a Net Zero Carbon building and fossil fuels shall not be used on-site to provide heat.

5.54 — Offsetting is a last resort when all onsite options have been exhausted, in particular:

(i) Space heating demand and energy use intensity (EUI) comply with Local Plan policy.

(ii) On-site renewable energy generation has been maximised to achieve an energy balance.

5.55 — Where an Energy Balance is not achieved, applicants should establish the shortfall in renewable energy generation to enable the annual renewable energy generation to match the Energy Use Intensity in kWh. The applicant should pay into the council’s offset fund a sum of money equivalent to this shortfall.

  
**NEW BUILDINGS CANNOT CONTINUE TO BURN FOSSIL FUELS FOR HEATING IF EALING IS TO STAY WITHIN CARBON BUDGETS.**

5.56 — The Performance Gap is the difference between the performance of a building once completed and that specified at the design stage. Developments must monitor their total energy use and renewable energy generation and submit the annual figures to the local planning authority for the first 5 years of operation.

5.57 — Excellent design and detailing need to be matched by high quality construction and commissioning in order for the 'performance gap' between the design and actual in-use energy to be reduced. This can be achieved by energy performance construction quality assurance schemes such as the Passivhaus standard or the AECB Building standards.

### Policy ECP: Embodied Carbon – Ealing LPA – local policy

Major developments should not exceed the embodied carbon limits set out in Table DMP4.

5.58 — Embodied Carbon should be considered as early as possible in the planning process, as upfront embodied carbon contributes the largest proportion of embodied carbon across a building's life cycle.



**Image:** Retrofitting properties to reduce energy consumption to make the Borough net carbon neutral by 2030.



**Table DMP4:**  
Embodied Carbon Limits

Buildings should not exceed the following embodied carbon limits (where technically feasible) by building type or nearest equivalent:

▼ Building type	▼ Until 2030
<b>Residential</b>	<500 kgCO2/m2
<b>Non-residential</b>	
Office	<600 kgCO2/m2
Education	<500 kgCO2/m2
Retail	<550 kgCO2/m2

▼ Building type	▼ Until 2030
<b>Residential</b>	<300 kgCO2/m2
<b>Non-residential</b>	
Office	<350 kgCO2/m2
Education	<300 kgCO2/m2
Retail	<300 kgCO2/m2

### Policy WLC: Whole Life Cycle Carbon Approach – Ealing LPA – local policy

- A. Major developments should undertake a Whole Life Carbon assessment in accordance with the requirements set out in the London Plan (2021).
- B. Major developments involving demolition should undertake carbon optioneering to determine the best approach to building form and reuse.

5.59 — Applicants will be required to undertake an optioneering exercise as part of the Whole Life Cycle Carbon Assessment, which seeks to evaluate in relative terms the carbon emission performance of different development options for an application site to determine the optimum option. The findings of this optioneering exercise should be considered alongside other planning considerations to determine the most appropriate option, including consideration of a retrofit first approach. The ‘options’ considered should include reuse/refurbish options, alongside any new build options if pursued. All options evaluated should be capable of comparison reflecting the same best practice standards.

5.60 — Further guidance will need to be prepared to support the implementation of carbon optioneering. Ealing is developing a carbon optioneering methodology to determine relevant best practice, based upon the main building and development typologies present in the borough. This will be particularly relevant to major developments and also to exceptional forms of development that have the potential to cause disproportionate impacts, such as tall buildings.

  
**ALL OPTIONS EVALUATED SHOULD BE CAPABLE OF COMPARISON REFLECTING THE SAME BEST PRACTICE STANDARDS.**

## Policy SI 7: Reducing Waste and Supporting the Circular Economy – Ealing LPA – local variation

D. Major development proposals should be supported by a circular economy statement, which demonstrates how the proposal achieves circular economy outcomes in accordance with part C of London Plan (2021) Policy SI 7.

5.61 — To further embed circular economy principles into the building design process all major development proposals are required to be supported by a circular economy statement.

  
**MAJOR DEVELOPMENT PROPOSALS SHOULD BE SUPPORTED BY A CIRCULAR ECONOMY STATEMENT.**



Image: Domestic recycling, Ealing.



**WE WILL SEEK CONTRIBUTIONS FROM DEVELOPERS TO FUND IMPROVEMENTS TO INFRASTRUCTURE AND THE ENVIRONMENT.**

**Policy FLP: Funding – The Local Plan – Ealing LPA – local policy**

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The council will:

- (i) Follow the approach set out in the London Plan (2021) in respect of negotiations on planning obligations to reflect strategic and local priorities for the provision of infrastructure.
- (ii) Establish local priorities with reference to the council’s Infrastructure Delivery Plan and associated schedule which identifies and promotes improvements in physical, social, and green infrastructure.
- (iii) Create a clear framework for future negotiations on planning obligations, including developer contributions that will include a new Community Infrastructure Levy (CIL) for Ealing LPA. More detail will be provided in a separate Supplementary Planning Document on Planning Obligations and Legal Agreements.

5.62 — In order to ensure that the policies and infrastructure requirements of the Local Plan are delivered in a way that achieves sustainable development, we will seek contributions from developers to fund improvements to infrastructure and the environment. The Infrastructure Delivery Plan (IDP) identifies the types of infrastructure required to support the anticipated growth in the borough, and additional infrastructure requirements will be identified during the course of the plan period as appropriate.

5.63 — The council are proposing the introduction of the Community Infrastructure Levy (CIL), which applies a standard charge to developers to fund supporting infrastructure such as transport, schools, community facilities and health centres. Until the CIL is in place, Section 106 agreements will continue be used to meet infrastructure requirements and more detail will be set out in the Planning Obligations SPD. Once the CIL is in place Section 106 agreements will still be required to address the provision of affordable housing and site-specific infrastructure or development mitigation requirements.

5.64 — A monitoring contribution will be required from development for the monitoring of planning obligations.



## Policy ENA: Enabling Development – Ealing LPA – local policy

A. Enabling development must be:

- (i) Demonstrably led by the objectives of the designation in question.
- (ii) Proportionate to the costs of the objective that is enabled.

B. Meeting housing or any other development target is not in itself enabling development.

5.65 — Enabling development is any development that would otherwise conflict with important plan objectives, such as the designation of a given site, but which is permitted in order to enable benefits to that objective or designation that outweigh any material planning harm.

5.66 — Enabling development does not constitute a blanket departure from other policies and it is particularly important that the level of development constitutes the absolute minimum necessary to meet the objective being enabled.



**Image:** Delivering infrastructure alongside urban development.