



MAY 2025

Ealing Local Plan Examination

Matter 4 Statement

Iceni Projects Limited on behalf of
Greystar Europe Holdings Ltd

May 2025

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ON BEHALF OF GREYSTAR
EUROPE HOLDINGS LTD

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1. INTRODUCTION

- 1.1 This Matter Statement has been prepared by Icen Projects on behalf of Greystar Europe Holdings Ltd (hereafter 'Greystar') who have landholdings at the Former Glaxo Smith Kline Headquarters (now known as Greenford Quay).
- 1.2 For context, the Greenford Quay scheme is a large mixed-use scheme comprising 2,118 homes, around 21,000sqm of flexible commercial floorspace, in addition to a new pedestrian bridge over the Grand Union Canal. The scheme was approved for heights ranging from 2 – 19 storeys and retained the Listed Glaxo House. This is being developed in accordance with planning permission 164694FUL, as amended by 18488VAR.
- 1.3 Greystar has been the largest rental apartment operator and largest developer in the US for the last 8 years and has an ambition to make a similar impact within the UK's Build to Rent (BTR) sector. Focusing in London, Greystar seek to deliver much needed additional homes at scale and at speed with the Greenford development aiming to deliver 1,965 new homes in only 6 years.
- 1.4 Greystar submitted Representations to the Regulation 19 consultation in relation to this Site which focused on housing, economic development and design / tall building policies.
- 1.5 This statement seeks to reinforce the points made in those and seek to ensure that the identified policies remain supportive of current and future development at this location and elsewhere within the Borough.

2. MATTER 4 – HOUSING

Issue [Focus – Policies SP4, HOU, H16, SSC] Whether the Plan has been positively prepared and whether it is justified, based on up-to-date and reliable evidence, effective, consistent with national policy and in general conformity with the London Plan in relation to housing development management policies.

Housing – general 4) Paying regard to paragraph 63 of the NPPF, is the size, type and tenure of housing needed for different groups in the community assessed and reflected in the planning policies?

- 2.1 Whilst Greystar support the Plan’s overall targets for housing delivery and the aim to deliver good quality homes at affordable rents, there are concerns that the draft policies do not go far enough in ensuring that all groups are being fully represented. In particular, there is a pressing need for a specific policy in relation to Build-to-Rent (BTR) developments.
- 2.2 Greystar considers that the inclusion of a specific BTR policy should remain a priority. There is a history of limited affordable accommodation within the Borough and the BTR model would offer a vital housing option for employees who would not be able to access traditional affordable housing and would otherwise be priced out of the local housing market by the high levels of market rent.
- 2.3 Further benefits to supporting BTR schemes within the Borough include an increased provision of higher quality housing as such residential accommodation is usually delivered by institutional landlords who provide better health and safety, holistic care and better commercial practices in tenant care. BTR schemes also provide amenity space within the existing structures, taking pressure off some local services.
- 2.4 BTR schemes will also free up homes within the Private Rented Sector, with the secondary family housing stock found within this sector being particularly ill-suited to the needs of individual renters, who nevertheless occupy this stock, depleting the supply for families in need of such housing.
- 2.5 In summary, whilst Greystar supports the overarching goals of the Plan in delivering quality, affordable homes, there remains a critical gap in the recognition and support for Build-to-Rent (BTR) developments. A dedicated BTR policy is essential to ensure a more inclusive housing strategy that addresses the needs of a broader demographic—particularly workers and individuals who fall outside the scope of traditional affordable housing provision. BTR developments can significantly contribute to the Borough by offering high-quality rental accommodation, improving tenant care standards, alleviating pressure on existing local infrastructure, and freeing up much-needed family housing in the Private Rented Sector. To fully realise the Plan’s ambitions, it is imperative that BTR is formally recognised and encouraged through targeted policy support.

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- 2.6 In summary, Greystar does not consider that the type and tenure of housing needed for different groups is reflected in the policy.

Housing – general 5h) How does the evidence demonstrate that the 40% threshold will be effective in maximising affordable housing provision in Ealing? What is the Council’s response to the GLA’s representation setting out their view on the differences in provision between schemes following the fast-track route versus viability tested schemes?

- 2.7 Greystar has concerns with the requirement for 40% affordable housing provision to be eligible for the Fast Track route as such a large contribution is likely to create practical challenges and viability issues for developers.
- 2.8 Greystar does not consider that sufficient evidence has been provided to justify the proposed 40% threshold as an effective means of maximising affordable housing delivery. Further viability testing and justification from the Council are necessary, particularly as the figure exceeds the threshold set out in the London Plan.

Affordable Housing 5j) Are the requirements in HOU(E) in relation in relation to large scale purpose built shared living developments justified)? Is a contribution in the form of conventional housing units on site deliverable in practice?

- 2.9 Greystar objects to the inclusion of Point E within Policy HOU (Affordable Housing). While the need for affordable housing in the borough is acknowledged, imposing a blanket requirement for all Large Scale Purpose-Built Shared Living (PBSL) developments to deliver affordable housing solely in the form of conventional (C3) units is impractical. The distinct design and layout of PBSL schemes make such integration unfeasible in most cases.
- 2.10 Although this approach may be viable on large, multi-building sites where conventional units can be delivered separately, it is highly challenging to accommodate both PBSL and traditional housing within a single structure. Greystar therefore requests that the policy be revised to permit PBSL developments to deliver their affordable housing contribution in the form of PBSL units.
- 2.11 In summary, Greystar does not consider the requirements set out in HOU(E) regarding PBSL developments to be justified or viable in their current form.

Other specialist housing - 8b) Does the evidence support the position that there is no identified local need for shared living in Ealing, taking a restrictive approach, and limiting it Ealing Metropolitan Town Centre?

- 2.12 Greystar object to the restriction limiting all PBSL developments to Ealing Metropolitan Town Centre as they consider that each site should be assessed on its individual merits.
- 2.13 There is a need for such developments to be located in areas well connected to public transport, local amenities, and employment opportunities and limiting these schemes, which are proven to support young single people, risks reducing their presence in the borough.
- 2.14 As part of their Regulation 19 response to draft Policy H16, Greystar provided a table showing a number of co-living schemes that were recently approved outside the Ealing Metropolitan Town Centre. This table (featured below) highlights that the restriction imposed by Policy H16 was contrary to many of the forthcoming co-living schemes in the Borough and reinforces that areas beyond the town centre remain suitable for this use.

Site	LPA Ref.	No of Units
The Castle Hotel Victoria Road	214465OPDFUL	462
208 Western Avenue	193574FUL	264
200 Western Avenue	190312FUL	335
Cecilia House 16 – 17 (Pending)	220090FUL	47
Land South of Varden Close	190312FUL	335
Parking Area at rear of 14 Hanger Lane	192740FUL	11
Nash House, Old Oak Lane, Park Royal	165092OPDFUL	323
115 Gunnersbury Lane, Ealing	163170FUL	31

- 2.15 Greystar maintain that co-living will continue to play a key role in addressing future housing need as it acts as a platform that offers new graduates and young professionals seeking accommodation locally to home ownership an alternative between student accommodation and paying full market rent.
- 2.16 Based on the clear evidence shown in the table above, large-scale co-living schemes are coming forward in other areas of Ealing and Greystar would welcome further evidence to justify why the Council seeks to prevent this from happening.
- 2.17 In summary, Greystar does not consider the current evidence base justifies the position that there is no local need for shared living in Ealing Metropolitan Town Centre.