



# Ealing Local Plan Examination

## Matter 4 Statement

Iceni Projects Limited on behalf of  
Brydell Partners

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## 1. INTRODUCTION

- 1.1 This Matter Statement has been prepared by Icen Projects on behalf of Brydell Partners (hereafter 'Brydell') who have landholdings at the Former Greenwich School of Management (Site Allocation 05GR).
- 1.2 Brydell have a wide-ranging property portfolio that extends from hotels, residential, senior living and student accommodation to retail warehousing, industrial, offices and labs. More specifically in Ealing, they own the Former Greenwich School of Management site on Greenford Road (Site Allocation 05GR) with their ownership bound by Oldfield Lane North to the northwest, Greenford Road to the east, and the existing Ferrero office complex at 889 Greenford Road to the south.
- 1.3 Brydell submitted representations to the Regulation 19 stage in relation to this site which focused on housing, economic development and design / tall building policies.
- 1.4 This statement seeks to reinforce the points made in their representations to the Regulation 19 consultation and ensure that the identified policies remain supportive of current and future development at the Former Greenwich School of Management site and elsewhere within the District.

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## 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.

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**5h) Affordable Housing - 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?**

- 2.1 Brydell has concerns regarding the proposed 40% affordable housing requirement to qualify for the Fast Track route, as such a high threshold is likely to present significant viability challenges for most developments. This concern also extends to Point F, which relates to the Fast Track Route for purpose-built student accommodation (PBSA). While the inclusion of a Fast Track option for PBSA is welcomed, the 40% requirement is considered unrealistic and likely to render the route unviable for the majority of schemes.
- 2.2 Brydell recommends that affordable housing provision should be assessed on a site-by-site basis, taking into account individual viability considerations. Policy HOU should also acknowledge the need for flexibility across different housing typologies, such as Build to Rent, which may necessitate alternative affordable housing tenures. The policy should explicitly allow for affordable housing contributions to be subject to viability testing.
- 2.3 In summary, Brydell 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.

**5j) Affordable Housing - Are the requirements in HOU(E) 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?**

- 2.4 Brydell objects to the inclusion of Point E in Policy HOU. While the need for affordable housing in the borough is acknowledged, the blanket requirement for all Large Scale Purpose Built Shared Living (PBSL) developments to deliver affordable housing in the form of conventional C3 units is considered unworkable. The fundamental differences in design, layout, and function between PBSL and traditional housing make such an approach impractical.

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- 2.5 Although this strategy may be feasible on larger, multi-building sites where conventional housing can be delivered in a separate block, it would be highly challenging—both practically and operationally—to deliver PBSL and C3 accommodation within the same building. Brydell therefore recommends that the policy be amended to allow PBSL schemes to meet their affordable housing contributions through on-site provision of affordable PBSL units.
- 2.6 In summary, Brydell 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?**

- 2.7 Brydell maintains that co-living will continue to play a vital role in meeting future housing needs, offering new graduates and young professionals a valuable alternative between student accommodation and full market rent, and potentially easing the transition to home ownership.
- 2.8 Brydell reiterates its support for large-scale purpose-built shared living (PBSL) developments and emphasises the importance of locating such schemes in areas with strong access to public transport, local amenities, and employment opportunities.
- 2.9 It is disappointing that the policy continues to restrict all PBSL developments to Ealing Metropolitan Town Centre. Brydell believes that sites should be assessed on their individual merits and that constraining such developments, despite their proven benefits for students and young professionals, risks limiting housing choice and reducing accessibility for these groups across the borough.
- 2.10 In summary, Brydell does not consider the current evidence base justifies the position that there is no local need for shared living in Ealing.