



Ealing Local Plan Examination

Matter 4 Statement

Iceni Projects Limited on behalf of
Imperial College London

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1. INTRODUCTION

- 1.1 This Matter Statement has been prepared by Icen Projects on behalf of Imperial College London (hereafter 'Imperial') who have landholdings in North Acton comprising 140 Wales Farm Road, Woodward Halls, 1 Portal Way and the Victoria Industrial Estate which are located close to the northern boundary of the District.
- 1.2 Imperial is a significant stakeholder within Ealing and the OPDC, as a major landowner, operator and landlord of homes and workspaces in North Acton and West London as a whole. North Acton is home to two of Imperial's newest halls of residence, Woodward and the Kemp Porter Buildings, which opened in 2014 and 2020 respectively alongside residential accommodation including key worker accommodation for Imperial staff.
- 1.3 Representations were submitted at the Regulation 19 stage in relation to these sites which focuses on housing, economic development and design / tall building policies.
- 1.4 This statement seeks to reinforce the points made in our representations to the Regulation 19 consultation and seek to ensure that the identified policies remain supportive of current and future development within the District.

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 Imperial 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 additional support for Key Worker housing and specific policies in relation to Purpose-Built Student Accommodation (PBSA) and Build-to-Rent (BTR) developments.

Key Worker Housing

- 2.2 Imperial remain committed to expressing support for key worker accommodation which is not currently recognised as an affordable housing type in the Borough. The GLA Planning Practice Note on Prioritising Key Workers for Intermediate Affordable Housing (March 2024) highlights how critical key worker housing is for London and expresses the mayor's vision to promote and support the development of key worker homes. Additionally, on 25th November 2024, the Mayor of London announced a new proposal to create Key Worker Living Rent (KWLR) homes. These are to comprise rent-controller housing that will be aimed at helping key workers afford to live in London with rents set at 40% of average post-tax key worker household income. The government plan to start building at least 6,000 of these homes by 2030, with the intention being to complement – not replace – existing social housing types, building on the existing London Living Rent model.

Imperial strongly supports this messaging from the government and sees key worker housing to be imperative to support its planned growth in the Borough. Overall, Imperial has 9,500 staff and is a major employer of key workers in London. Around 66% of Imperial staff earn below the £67,000 income threshold for intermediate rented products like Key Worker Living Rent. Imperial's staff turnover has averaged 19% per annum over the past five years.

- 2.3 Currently, Imperial have over c. 2,500 staff on their key worker waitlist. Alongside this requirement, Imperial's partner, Imperial College Healthcare NHS Trust also have a significant and growing requirement for accommodation to ensure they can facilitate growing staffing demand for affordable homes. At present, Imperial have circa 35 key worker residential apartments at Clayworks

Apartments and further key worker accommodation in White City, with an aim to significantly expand the level of key worker provision within the Imperial portfolio as such accommodation is vital to retaining talent nearby to our campuses, innovation district and hospitals. Imperial welcomes the opportunity to work with third-party developers to secure additional key worker accommodation in Ealing.

- 2.4 Imperial urges the Borough to formally recognise key worker accommodation as a distinct and essential category of affordable housing within local planning policy. With strong alignment between Imperial's objectives and the Mayor of London's recent initiatives, including the Key Worker Living Rent (KWLR) proposal, there is a clear opportunity for local policy to better reflect the urgent and growing demand for key worker homes.

Purpose-Built Student Accommodation (PBSA) Policy

- 2.5 Imperial seeks to highlight the urgent need for a dedicated policy on Purpose Built Student Accommodation (PBSA) in the Ealing Local Plan. As a Higher Education Institution, PBSA delivery remains a key priority for Imperial, which has a strong track record of providing affordable, high-quality, modern rooms to support student welfare, socialisation, and a diverse student body.
- 2.6 Demand for PBSA is growing, with increasing numbers of students seeking this type of housing. Over the past three academic years, Imperial has been significantly oversubscribed and expects demand to rise further amid worsening supply challenges across London. This is driven by a shortage in both PBSA and private rental markets, alongside the appeal of PBSA's security, institutional management, and ancillary benefits.
- 2.7 As Imperial competes globally for top talent, the availability of affordable student accommodation is vital to its sustainability. The current shortfall in housing has been identified as a risk to future operations. CBRE data from August 2023 highlights a 106,000-bed shortfall in Greater London, a 45% increase since 2017/18, which threatens the long-term viability of London's higher education institutions.
- 2.8 Imperial urges Ealing Council to develop a dedicated PBSA policy that supports delivery of affordable student housing at scale. The policy should align with London Plan Policy H15, including a requirement for third-party developers to secure nominations agreements with Higher Education Institutions and include affordable student units. Imperial welcomes clarification on the Council's position and encourages inclusion of these requirements in future Local Plan updates.

Build to Rent (BTR)

- 2.9 In addition to the above, Imperial also considers that the inclusion of a specific Built to Rent (BTR) policy should remain a priority. Many Imperial staff face a shortage of affordable housing, and the BTR model offers a crucial option for those unable to access traditional affordable housing but priced out of the private rental market.

West Tech Corridor

The WestTech Corridor (WTC) presents an economic regeneration strategy for West London, supporting the creation of a globally competitive innovation district in the region. The WTC is established within the Mayors London Growth Plan and has been adopted as a key economic initiative within the Ealing Jobs and Skills Strategy given the strategy identifies Ealing as a key borough for future innovation activity. Housing infrastructure is critical to support the expected growth of thousands of new jobs and significant investment to Ealing within the innovation sector as part of the West Tech Corridor strategy. Imperial are leader of the West Tech Corridor, and advocate for a wide range of housing typologies and tenures within the borough to meet this demand. This includes as above the provision of key worker accommodation, PBSA, BTR and the inclusion of Co-Living homes. A wider variety of homes will ensure talent can live within the innovation ecosystem in affordable community-led spaces.

Summary

- 2.10 Imperial supports the overarching goals of the Ealing Local Plan but urges the Council to strengthen its approach by explicitly addressing the distinct and growing needs for Key Worker housing, Purpose-Built Student Accommodation (PBSA), and Build to Rent (BTR) developments. These housing types are vital to the success of key local institutions, including Imperial College London and its healthcare and innovation partners, and are essential to ensuring Ealing can retain talent, support economic growth, and meet the real-world housing demands of its workforce and student population. Imperial encourages the Council to align local policy with the Mayor of London's strategic direction and London Plan policies on key worker accommodation and PBSA to ensure the Local Plan delivers inclusive, responsive, and sustainable housing solutions for all groups.
- 2.11 In summary, Imperial 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?

- 2.12 Imperial 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. This is in the context of a challenging viability and regulatory environment, significantly impacting the delivery of residential accommodation in London, exacerbating the housing crisis. Additionally, with regards to Point F which relates to the Fast Track Route for student accommodation schemes, Imperial maintain the same position and, whilst the inclusion of a Fast Track Scheme for PBSA is a welcome addition to the policy, the 40% requirement to be considered eligible is considered too high to be viable for the vast majority of developments.
- 2.13 In summary, Imperial 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?

- 2.14 Imperial object to the inclusion of Point E in Policy HOU (Affordable Housing). Whilst there is an understandable need for affordable housing in the borough, a blanket requirement for all Large Scale Purpose Built Shared Living Developments (PBSL) accommodation to provide its affordable housing contribution in the form of conventional housing (C3) will not be workable in practice owing to the differing designs and layout of the respective types of accommodation.
- 2.15 Whilst this strategy may work on larger, multiple building sites where the residential contribution can be located in a single building, it will be extremely difficult from a practical perspective to provide both PBSL and conventional residential accommodation in the same building. This includes issues around safeguarding of students, operational management and community building. As above, it is vital for the sustainability and growth of Higher Education Institutions in the borough to provide affordable suitable accommodation to students. Imperial has found that increased housing costs and supply shortages are a significant block to students from a diverse background to access higher education. As outlined in the Mayors London Growth Plan, Higher Education is a key growth sector and competitive advantage of London, thereby Boroughs should support the sustainability of institutions

through the provision of affordable student housing. Imperial request that the policy is amended to allow PBSL schemes to provide their affordable contribution as PBSL units.

- 2.16 In summary, Imperial 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?

- 2.17 Imperial 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.
- 2.18 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.
- 2.19 Ealing as a Borough is one of the most connected places in the UK, with many areas able to accommodate and support PBSL. A review of the Borough's town centres against the Transport for London PTAL Map has shown that there are large areas outside the identified town centres which benefit from higher PTAL ratings. Large parts of Acton benefit from 6a and 6b ratings despite being outside town centre boundaries whereas large parts of the Greenford and Southhall centres have ratings of 4 and 3. This provides compelling evidence which indicates that town centres are not always the most sustainable locations for development and that other areas are also viable if not more so for co-living uses.
- 2.20 Included within Imperial's response to the Regulation 19 consultation was a table of approved co-living schemes outside the Ealing Metropolitan Town Centre. This highlights that the restriction in Policy H16 contradicts the direction of many forthcoming developments and reinforces that areas beyond the Ealing Metropolitan Town Centre remain viable and sustainable 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

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- 2.21 Imperial support a diverse housing market that includes affordable homes and a range of typologies—PBSA, co-living, and Build to Rent (BTR)—complementing the existing private sale and rental markets. These models allow young professionals, innovators and students to stay local, supporting economic and community development. They also act as transitional housing, bridging the gap between student accommodation and the traditional housing market, helping to relieve pressure on private rentals. This includes early career academics, innovators and entrepreneurs seeking transitional housing in the borough nearby to key innovation zones within the West Tech Corridor. As such they remain critical in addressing future housing needs, particularly for younger and/or early career single households seeking safe, community-led alternatives to the private rental sector.
- 2.22 In light of the data provided, large-scale co-living schemes are clearly viable outside Ealing Metropolitan Town Centre. Imperial would welcome further evidence explaining the Council’s continued restriction against such developments elsewhere in the borough, despite planning approvals across Ealing in well connection locations.
- 2.23 In summary, Imperial does not consider the current evidence base justifies the position that there is no local need for shared living in Ealing outside the town centres.