



**Places for London
Property Development**

Victoria Station House
191 Victoria Street
London SW1E 5NE

placesforlondon.co.uk

herminesanson@tfl.gov.uk
07840 857211

Date: 15 May 2025
Our ref: TfL/Places/HS – Ealing Local Plan MIQ
Your ref: -

Paige Gaughan
Perceval House
14-16 Uxbridge Road
London W5 2HL

By email: localplanprogrammeofficer@ealing.gov.uk

Dear Ms Gaughan

**EALING NEW LOCAL PLAN
INSPECTORS MATTERS, ISSUES AND QUESTIONS
PLACES FOR LONDON STATEMENTS ON MATTERS 4 AND 5**

We are writing to provide our Statements in response to the Inspector's Matters, Issues and Questions (MIQs) prior to the Examination in Public (EiP) of Ealing Council's Draft New Local Plan. We are responding to matters 4 and 5 as part of Block 1.

Places for London (Places) is Transport for London's (TfL) property company. It manages TfL's commercial property assets and develops its surplus and / or under-used land to deliver new homes and jobs in highly sustainable locations. Places submitted a representation to the draft local Plan Reg 19 consultation on 18 April 2024.

Please note that our attached Statements on matters 4 and 5 are the views of the Places' planning and design team in its capacity as a significant landowner, developer and landlord in Ealing only and are separate from any responses that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided separate responses at the various stages of preparation of the draft Local Plan in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

As per our emails of 2 May 2025, we have registered to participate in the following Examination Hearing:

- Hearing session for Block 2 in relation to Matter 9

Please also note that Carter Jonas, on behalf of the West London Partnership (a joint venture between Places / TfL and Barratt London) is responding separately in respect of the draft site allocation for Ealing Common Depot (Site 03AC) and related matters.

We trust that our attached written Statements are clear and helpful. If you need any further information or clarification at this stage, please do not hesitate to contact me or my colleague Brendan Hodges.

We would be grateful if you could confirm receipt of this letter and Statements.

Yours sincerely



Hermine Sanson
Planning Manager
Places for London

cc.

Patricia Cazes-Potgieter	Places for London
Brendan Hodges	Places for London
Andrew Russell	Places for London
Matt Doman	Places for London
Monika Jain	TfL Spatial Planning
Alister Henderson	Carter Jonas
Martin Scholar	Barratt London
Max Smyth	Barratt London

Ealing New Local Plan – Examination in Public

Places for London

Written Statements: Matters 4 and 5

Places for London (Places) is Transport for London's (TfL) property company. It manages TfL's commercial property assets and develops its surplus and / or under-used land to deliver new homes and jobs in highly sustainable locations. Places has submitted Reg 19 representations in April 2024.

Matter 4: Housing

Issue: Affordable Housing

Q5c. In terms of Policy HOU, is the interaction with Policy H5 of the London Plan clear in terms of setting out the instances where an affordable housing contribution will be sought? Paying regard to Policy H5(B)(2) and (3) is modification needed to clarify the position in relation to public sector and industrial land?

Places welcomes the Council's Suggested Minor Modification (SMMI33) (S24 – Schedule of Suggested Modifications, Nov 2024) to draft Policy HOU C, which provides helpful clarification on the application of the Fast Track Route under London Plan Policy H5(B)(2). Specifically, the modification makes clear that in Ealing, the Fast Track Route will only apply to schemes providing at least 40% affordable housing, except on public or designated industrial land.

In relation to Policy H5(B)(2) of the London Plan, we consider the interaction with Policy HOU C to be broadly clear. The London Plan explicitly enables public sector landowners to utilise a portfolio approach (Policy H4(A)(4) and paragraph 4.4.7), whereby 50% affordable housing can be delivered across a portfolio, with no less than 35% on individual sites, allowing continued eligibility for the Fast Track Route. As a public sector landowner with a portfolio agreement in place with the Mayor, Places for London (TfL) supports this flexible approach.

We are therefore generally supportive of the Council's SMM, as it preserves conformity with the London Plan's approach to public land. However, to further improve clarity and avoid any ambiguity—particularly regarding the eligibility of public sector schemes for the Fast Track Route—it may be helpful for the modification to explicitly reference the portfolio approach and the provisions of H5(B)(2). This would ensure there is no confusion around how affordable housing contributions are sought in relation to public land.

Matter 5: Economic Development

Issue: Affordable Workspace

d. does the variation proposed in (F) to (H) alter the defined circumstances approach in favour of a blanket levy and, if so, is that a sound approach?

While we support the ambition of draft Policy E3 and the provision of affordable workspace in principle, we have concerns that Part F and H of the draft policy requiring a 10% provision in mixed use schemes with 80% discount to market rents could adversely impact scheme viability, particularly for mixed-use schemes on public land which are expected to deliver 50% affordable housing.

We reiterate our comments made in our Reg I8 and Reg I9 representations that Policy E3 and supporting text should recognise the viability challenges associated with the development of housing-led and mixed-use schemes on public land, and particularly on sites with transport and other infrastructure constraints.

The policy should therefore seek lower provision of affordable workspace in association with mixed use schemes which deliver 35% or more affordable housing; this would ensure that affordable housing remains the priority.

We also suggest that it should be made clear that affordable workspace is just one of a wide range of public benefits which may be sought from a development and that it should be balanced in each case against other, potentially higher-priority benefits such as affordable housing, community infrastructure, open and playspace provision etc.

When scheme viability is an issue, affordable housing and necessary public transport improvements should be prioritised in accordance with London Plan Policy DFID (Delivery of the Plan and Planning Obligations).

Other matters and Examination in Public

Places intends to submit written statements for Matters 6, 7, and 9.

We have also requested to appear at the Ealing New Local Plan Examination in Public to discuss Matter 9 and the need to deliver tall buildings (draft Local Plan and London Plan Policies D9), including to optimise housing delivery. This is particularly relevant to our Sites 02SO Southall Sidings.

Places, together with our JV partner Barratt London as part of the West London Partnership (WLP), will also attend the EIP in relation to Site 03AC - Ealing Common Depot. Please see related correspondence from Carter Jonas on behalf of the WLP.