



Ealing Local Plan Examination

Matter 5 Statement

Iceni Projects Limited on behalf of
Brydell Partners

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Iceni Projects

Birmingham: The Colmore Building, 20 Colmore Circus Queensway, Birmingham B4 6AT

London: Da Vinci House, 44 Saffron Hill, London, EC1N 8FH

Edinburgh: 11 Alva Street, Edinburgh, EH2 4PH

Glasgow: 177 West George Street, Glasgow, G2 2LB

Manchester: This is the Space, 68 Quay Street, Manchester, M3 3EJ

t: 020 3640 8508 | w: iceniprojects.com | e: mail@iceniprojects.com

linkedin: [linkedin.com/company/iceni-projects](https://www.linkedin.com/company/iceni-projects) | twitter: [@iceniprojects](https://twitter.com/iceniprojects)

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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.

2. MATTER 5 – ECONOMIC DEVELOPMENT

Issue [Focus – Policies SP4, E3, E4, E6] Whether the Plan is justified, effective and consistent with national policy and in general conformity with the London Plan in relation to economic development.

Affordable Workspace – 6e) Is the policy consistent with Paragraph 85 of the NPPF in terms of helping to create the conditions in which businesses can invest, expand and adapt and allowing the area to build on its strengths, counter weaknesses, and address future challenges?

- 2.1 Brydell objects to the uniform approach to discounted market rents across Ealing, which is considered unsuitable given the diverse range of commercial markets throughout the borough and the context of most key strategic sites.
- 2.2 While Brydell acknowledges the importance of delivering diverse commercial space in Ealing, it also raises concerns regarding the proposed affordable workspace quotas in draft Policy E3.
- 2.3 Key concerns include:
1. A uniform approach to discounted rents across Ealing could hinder viability in less established commercial areas.
 2. Lack of flexibility in assessing schemes individually could further impede viability.
 3. Mixed-use developments face disproportionately high affordable workspace obligations without adequate justification, potentially discouraging such developments.
- 2.4 In response to the above, Brydell suggests allowing for lower proportions of floorspace where identified needs can still be met and emphasises the importance of a more flexible approach to reflect varying site circumstances.
- 2.5 In summary, Brydell objects to the blanket application of discounted market rent requirements and affordable workspace quotas as outlined in draft Policy E3. The proposed approach does not adequately reflect the differing commercial conditions across the borough and poses particular challenges for early-stage regeneration schemes, such as 1 Portal Way. Without clear evidence supporting the 80% discount figure or the high obligations placed on mixed-use schemes, the policy risks undermining development viability and deterring investment. Brydell recommends a more flexible, evidence-based approach that accounts for site-specific context and viability, and allows for reduced affordable workspace provision where demand can still be met.

Affordable Workspace – 6i) Would the higher 10% levy for mixed use schemes in Policy E3(F) incentivise applicants to bring forward proposals for office and industrial schemes at the lower 5% and, if so, would that have implications for the effectiveness of the policy and/or the Spatial Strategy?

- 2.6 Brydell considers the requirement for mixed-use developments to deliver double the affordable workspace provision compared to purely commercial schemes to be wholly unjustified. This policy risks discouraging the delivery of mixed-use schemes, which are essential for building vibrant, integrated communities, and appears to conflict with the overarching objectives of draft Policy SP1, which promotes mixed and balanced development across the borough.
- 2.7 As an alternative, Brydell recommends adopting a flexible approach similar to that used by the London Borough of Hammersmith and Fulham (LBHF), where affordable workspace obligations are assessed on a case-by-case basis rather than through rigid targets. This method is especially relevant given ongoing viability challenges and rising construction costs, which are concerns shared by LBHF.
- 2.8 Additionally, Brydell also supports the development of criteria allowing for exceptions to minimum thresholds, particularly for small occupiers such as creatives. Coordination between determining authorities, including the Old Oak and Park Royal Development Corporation (OPDC) is also encouraged.

In summary, Brydell do not consider the increased levy for mixed use schemes will incentivise applicants to bring proposals forward.