



# Ealing Local Plan Examination

## Matter 5 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.
- 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.

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## 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.

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**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 Imperial objects to the uniform approach to discounted market rents across Ealing which is considered to be unsuitable given the diverse commercial environments, markets and viability issues, experienced particularly in early regeneration areas like North Acton. Imperial considers that the policy lacks evidence to support the 80% discount figure and that additional evidence should be provided if such a large contribution is being requested.
- 2.2 Imperial acknowledges the necessity of providing diverse commercial space in Ealing but 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, further harming the delivery of new commercial developments.
  2. Lack of flexibility in assessing schemes individually could further impede viability. For example, the cost and operational management requirements of delivering a science and innovation building particularly in managed lab spaces compared to a data centre would not be factored into the assessment of viability.
  3. Mixed-use developments face disproportionately high affordable workspace obligations without adequate justification, potentially discouraging such developments. The National Planning Policy Framework and London Plan encourages the delivery of mixed-use developments; therefore, this policy does not conform.
- 2.4 In summary, Imperial objects to the blanket application of discounted market rent requirements and affordable workspace quotas as outlined in draft Policy E3. The current approach fails to reflect the varied commercial conditions across the borough and poses a particular challenge to early-stage regeneration schemes such as 1 Portal Way, North Acton. Without clear evidence to justify the 80% discount figure or the proportional obligations on mixed-use schemes, the policy risks undermining

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the viability of developments, discouraging investment and further harming the delivery of commercial development in the Borough. Imperial recommends a more flexible, evidence-based approach that considers site-specific context and viability, and allows for reduced floorspace contributions where demand can still be met particularly when it is evidence the workspace will provide high quality service, operational and environment conditions

**Affordable Workspace – 6i) 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?**

- 2.5 Imperial considers the decision to require double the affordable workspace provision in mixed-use developments compared to purely commercial schemes to be entirely unjustified. This approach risks deterring the delivery of mixed-use schemes, which are critical to achieving vibrant, integrated communities, and appears to contradict the strategic vision set out in draft Policy SP1 that supports mixed and balanced development across the borough. It is likely to encourage the delivery of mono-use residential across the borough, particularly in locations where the conditions for delivering viable commercial developments are difficult. This could include a poor environment, access, nascent or weak commercial market.
- 2.6 As an alternative, Imperial suggests aligning with the approach of the London Borough of Hammersmith and Fulham (LBHF), which considers affordable workspace obligations on a case-by-case basis rather than through fixed standards. This flexible approach is deemed prudent, especially considering construction cost inflation, weakening traditional office market and viability concerns shared with LBHF.
- 2.7 Additionally, Imperial also supports the development of criteria allowing for exceptions to minimum thresholds, particularly for small occupiers such as creatives. Imperial would support the Affordable Workspace policies to reflect the requirements of science and innovation commercial organisations as part of the West Tech Corridor. Coordination between determining authorities, including the Old Oak and Park Royal Development Corporation (OPDC) is also encouraged.
- 2.8 In summary, Imperial will continue to support the development of criteria in which affordable workspace provision can be accepted at less than the minimum threshold. It is important to highlight that Imperial have also submitted representations to the OPDC Planning Obligations SPC (now adopted) to the same effect and would welcome a coordinated approach between the two authorities.