



JULY 2025

Ealing Local Plan Examination

Matter 6 Statement

Iceni Projects Limited on behalf of
Greystar Europe Holdings Ltd

July 2025

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ON BEHALF OF GREYSTAR
EUROPE HOLDINGS LTD

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1. INTRODUCTION

- 1.1 This Matter Statement has been prepared by Iceni Projects on behalf of Greystar Europe Holdings Ltd (hereafter 'Greystar') who have landholdings at the Former Glaxo Smith Kline Headquarters (now known as Greenford Quay).
- 1.2 For context, the Greenford Quay scheme is a large mixed-use scheme comprising 2,118 homes, around 21,000sqm of flexible commercial floorspace, in addition to a new pedestrian bridge over the Grand Union Canal. The scheme was approved for heights ranging from 2 – 19 storeys and retained the Listed Glaxo House. This is being developed in accordance with planning permission 164694FUL, as amended by 18488VAR.
- 1.3 Greystar has been the largest rental apartment operator and largest developer in the US for the last 8 years and has an ambition to make a similar impact within the UK's Build to Rent (BTR) sector. Focusing in London, Greystar seek to deliver much needed additional homes at scale and at speed with the Greenford development aiming to deliver 1,965 new homes in only 6 years.
- 1.4 Greystar submitted Representations to the Regulation 19 consultation in relation to this Site which focused on housing, economic development, design / tall building, Town Plan and Development Site policies.
- 1.5 This statement seeks to reinforce the points made in those representations and also ensure that the identified policies remain supportive of current and future development at this location and elsewhere within the Borough.

2. MATTER 6 – DESIGN AND AMENITY, TALL BUILDINGS, AND HISTORIC ENVIRONMENT

Issue [Focus – Policies DAA, D9] Whether the Plan is justified, effective and consistent with national policy and in general conformity with the London Plan in relation to design, the historic environment, and tall buildings.

Tall Buildings 2c) In terms of the local variation to Policy D9 of the London Plan, does the character led approach of the Plan to determining building heights strike an appropriate balance with “Good Growth” and appropriate densification principles of the London Plan?

- 2.1 Whilst Greystar support the generally positive approach to growth within the borough, there are concerns regarding the application of maximum building heights and the impact this will have on the council's ability to respond to changing strategic and national housing demands. Greystar consider that the current inflexible approach which defines certain areas that are suitable for tall buildings, puts the borough at risk of stymying its future development potential, risking the benefits of “Good Growth” in the process.
- 2.2 Since the publication of the Regulation 19 plan in February 2024, the NPPF has been updated as well as the Standard Method Calculation which, in pursuit of building 1.5 million new homes, seeks to set Ealing a target of achieving 3,407dpa – a figure that significantly exceeds the current figure set by the London Plan.
- 2.3 In light of the changes to the Standard Method and the ever-changing landscape of strategic and national housing demands. Greystar consider that a more flexible policy is required which does not put a limit on how tall buildings can be and where they can be located, instead opting to determine individual applications on their individual merits.
- 2.4 This more flexible approach is more akin to that adopted by the new London Plan Consultation document at Paragraph 4.2 (Tall Buildings). This suggests that the new plan should take a more active role in “identifying and defining tall building clusters” but also recognises that the policy needs “to be clearer about how applications should be assessed outside these defined clusters”. This confirms that the London Plan still views areas that are outside defined tall building clusters as viable for tall buildings. Paragraph 4.2 of the Consultation Document concludes by stating that “whatever option is taken, all individual applications would still need to be assessed on their own merits against policy criteria”.
- 2.5 Greystar consider that the council's tall building should adopt a similar stance to that of the London Plan Consultation document which looks to assess all proposals on their individual merits regardless of their proximity to a tall building cluster or the local context of a tall building.

Tall buildings 5f) In terms of the local variation to Policy D9 of the London Plan, is the local approach to defining the parameters for tall buildings across the borough consistent with evidence base documents EB42, EB44, EB45, EB45A, EB45B, EB46, EB47 and EB48?

- 2.6 Greystar consider that there are inconsistencies between the definitions of tall buildings outlined in Draft Policy D9 and the evidence base. A key example is in Table DMP1 where in Area E14 the definition is 21 storeys, but 9 storeys for the same area in the Tall Building Strategy Main Report (EB44). Additionally, there are Areas which are identified as “suitable for tall buildings” in Policy D9 Table DMP1 but indicated for a “maximum height” which is below the tall building thresholds identified in the Tall Building Strategy. Examples are for Area E14 which is identified for 21 storeys in Table DMP1 and 9 storeys in the Tall Building Strategy.
- 2.7 Due to these inconsistencies, Greystar do not consider that Policy D9 provides sufficient evidence on what is meant by a tall building as the definition changes within the council’s evidence base. We would encourage the Council to revisit the Tall Building Strategy and its appendices, as well as Policy D9 to ensure that they are consistent in their approach and do not lead to a confusion resulting in reduced growth.

Tall Buildings 2e) In terms of the local variation to Policy D9 of the London Plan, will criteria F, G and H be effective in securing an appropriate design response that is sympathetic to the character and urban grain of the borough, as well as any site-specific constraints, in a manner that is in general conformity with the London Plan and consistent with national policy.

- 2.8 Greystar has concerns with the alignment of Draft Policy D9 and the London Plan. Draft Policy D9 Point F states that “Tall buildings above defined thresholds are exceptional and should be located upon specified Development Sites defined in the Development Plan”.
- 2.9 The wording is not only confusing, raising uncertainty over whether tall buildings must be justified by “exceptional circumstances” or exhibit “exceptional design”, but also overly restrictive. By limiting tall buildings to allocated sites, the policy fails to reflect the *Master Brewer* judgement (London Borough of Hillingdon v Mayor of London, 15 December 2021), which confirmed that while boroughs must identify suitable locations for tall buildings under Parts A and B of the Policy, such buildings may also be permitted on unallocated sites if they satisfy the impact criteria set out in Part C.
- 2.10 Accordingly, Greystar consider that sites which are not allocated can still be appropriate for tall buildings and request that the policy allow for greater flexibility, perhaps instead, setting out an “allocated sites first” approach to tall buildings and then opting to assess other sites that are outside allocations, or simply considering each site on its own merits.

Tall buildings – 5i) In terms of the local variation to Policy D9 of the London Plan, are any modifications needed to the variation to Policy D9 for soundness.

- 2.11 Greystar consider that Policy D9, as it stands, is too restrictive in its approach to tall buildings which is considered to limit their ability to come forward within the borough. As an alternative, a more positive approach which better responds to recent housing targets is proposed and suggest that the policy is reworded for each Draft Development Area as:
- 2.12 “Design analysis indicates heights of X to X storeys, but this should be subject to detailed design, technical and townscape assessments”.