



JULY 2025

Ealing Local Plan Examination

Matter 6 Statement

Iceni Projects Limited on behalf of
Brydell Partners

July 2025

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](https://www.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)

ICENI PROJECTS LIMITED
ON BEHALF OF BRYDELL
PARTNERS

Ealing Local Plan Examination
MATTER 6 STATEMENT

CONTENTS

1. INTRODUCTION..... 1

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

1. INTRODUCTION

- 1.3 This Matter Statement has been prepared by Iceni Projects on behalf of Brydell Partners (hereafter 'Brydell') who have landholdings at the Former Greenwich School of Management (Site Allocation 05GR).
- 2.3 Brydell have a wide-ranging property portfolio that extends from London residential, single-family homes, senior living and student accommodation to retail warehousing, industrial, retail, 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.
- 3.3 Brydell submitted representations to the Regulation 19 stage in relation to this site which focused on housing, economic development and design / tall building policies.
- 4.3 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 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?

- 1.3 While Brydell support the generally positive stance on growth within the borough, there are concerns about the rigid application of maximum building heights and the implications this may have on the council’s ability to adapt to evolving strategic and national housing needs. Brydell believe that the current inflexible approach risks undermining the borough’s future development potential, shifting the council’s role from a proactive to a reactive planning authority.
- 2.3 Since the publication of the Regulation 19 Plan in February 2024, both the National Planning Policy Framework (NPPF) and the Standard Method for calculating housing need have been updated. In support of the national target to deliver 1.5 million new homes, Ealing has now been set a revised housing target of 3,407 dwellings per annum (dpa)—a figure that significantly surpasses the target established in the London Plan.
- 3.3 In light of the changes to the Standard Method and the ever-changing landscape of strategic and national housing demands. Brydell consider that a more flexible policy is required which does not put a limit on how tall buildings can be, instead opting to determine individual applications on their individual merits.
- 4.3 This more flexible approach is similar to that adopted by the new London Plan Consultation document at Paragraph 4.2 (Tall Buildings). This states 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”. According to the London Plan therefore, areas that are outside defined tall building clusters still remain viable locations for tall buildings.
- 5.3 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”. Brydell 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?

- 6.3 Brydell note inconsistencies between the definition of tall buildings as set out in Draft Policy D9 and the accompanying evidence base. A key example can be found in Table DMP1, where Area E14 is defined as suitable for buildings up to 21 storeys, while the Tall Building Strategy Main Report (EB44) identifies a maximum height of just 9 storeys for the same area.
- 7.3 Furthermore, there are other areas listed in Policy D9 Table DMP1 as being “suitable for tall buildings,” yet the maximum heights proposed fall below the tall building thresholds established in the Tall Building Strategy. This discrepancy, again illustrated by Area E14, raises concerns about the clarity and consistency of policy application.
- 8.3 In addition to these discrepancies, Brydell do not believe that Policy D9 provides a clear or consistent definition of what constitutes a tall building, as this definition appears to shift across various parts of the council's evidence base. We urge the Council to revisit the Tall Building Strategy and its appendices, alongside Policy D9, to ensure alignment and clarity. A consistent and well-evidenced approach is essential to avoid confusion and ensure that development potential is not unnecessarily constrained.

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.

- 9.3 Brydell have concerns regarding the alignment of Draft Policy D9 with the London Plan. Specifically, Point F of the draft policy which states that tall buildings exceeding defined thresholds are considered exceptional and should only be located on designated Development Sites identified within the Development Plan.
- 10.3 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,
- 11.3 By contrast, Brydell consider that sites not formally allocated can still be suitable for tall buildings and recommend that the policy adopt a more flexible stance. This could take the form of an “allocated sites first” approach, prioritising development on designated sites while not precluding well-justified proposals elsewhere which should be considered on their own merits, and in relation to townscape, micro-climate, daylight, context amongst other matters.