



**Places for London  
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Date: 10 July 2025  
Our ref: TfL/Places/HS – Ealing Local Plan MIQ2  
Your ref: -

Paige Gaughan  
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By email: [localplanprogrammeofficer@ealing.gov.uk](mailto:localplanprogrammeofficer@ealing.gov.uk)

Dear Ms Gaughan

**EALING NEW LOCAL PLAN  
INSPECTORS MATTERS, ISSUES AND QUESTIONS  
PLACES FOR LONDON STATEMENTS ON MATTERS 6, 7 and 9**

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 6, 7 and 9 as part of Block 2.

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 6, 7 and 9 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
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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 6, 7 and 9

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 6: Design and Amenity, Tall Buildings, and the Historic Environment

### Question: Tall buildings

*2. In terms of the local variation to Policy D9 of the London Plan:*

*g. are the Council's suggested modifications {S24} for the design principles of specific site allocations throughout the Plan to refer to 'up to' a given number of storeys needed for the allocations to be justified by evidence, effective and therefore sound?*

No. In relation to site allocations at 02SO Southall Sidings and Site 01NO – Northolt Car Sales we do not consider that this is justified by the evidence or sound as set out below.

We support the use of 'appropriate' instead of 'maximum'. However, we remain concerned that the phrase 'up to' may still imply a fixed upper height limit, potentially constraining design flexibility and site optimisation.

#### Site 02SO – Southall Sidings

This site is subject to planning permission for residential development comprising 460 homes with building heights ranging from 4 to 16 storeys. This permission (Ref. 201888FUL) was granted on 19 January 2022 and has been implemented through enabling works completed in July 2023 and a number of pre-commencement conditions have been discharged. The scheme was redesigned to reflect updated fire safety guidance, with a Section 96a non-material amendment application approved in September 2024.

We welcome the site's allocation and the recognition that it is suitable in principle for tall buildings. However, we are concerned that the Regulation 19 draft site allocation reduces the height guidance from the Regulation 18 version, which referred to an indicative height range of 6–18 storeys (21–63 metres), to a statement that “*design analysis indicates a maximum height of 6 storeys (21 metres).*”

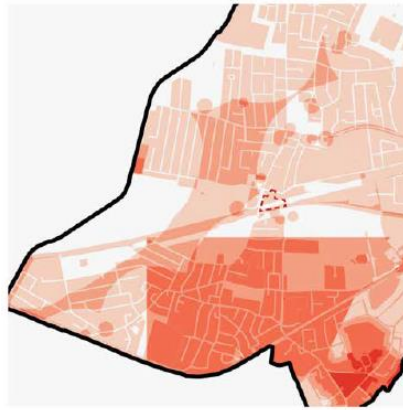
This is inconsistent with the Ealing Tall Buildings Strategy (Dec 2023), which identifies the site as appropriate for tall buildings (Zone I) which is appropriate for 6 to 18 storeys / 21–63 metres). The document shows our site in blue as being permitted and under construction, with the proposed massing shown as per the VuCity layer. See relevant extracts from the Council's evidence base document below.

We therefore request that this is deleted from the site allocation.

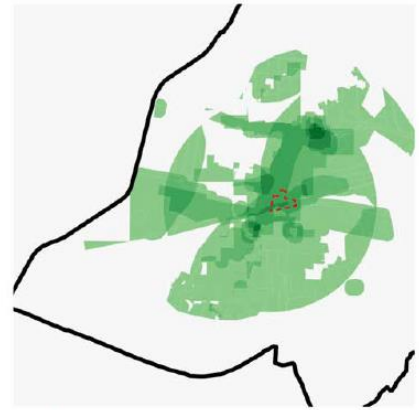
We question what design analysis this wording is based on which is unclear.

The current planning permission demonstrates that taller buildings can be successfully integrated into the site through a design-led approach and in full accordance with the qualitative assessment criteria for tall buildings which is set out in London Plan Policy D9 Part C.

## TALL BUILDINGS ANALYSIS



Sensitivity



Suitability

### Guidance for prospective tall building heights

<b>Zone I</b>	21 - 63 metres 6 - 18 storeys
<b>Zone J</b>	21 - 55 metres 6 - 27 storeys
<b>Zone K</b>	21 - 42 metres 6 - 12 storeys
<b>Zone L</b>	21 - 63 metres 6 - 18 storeys

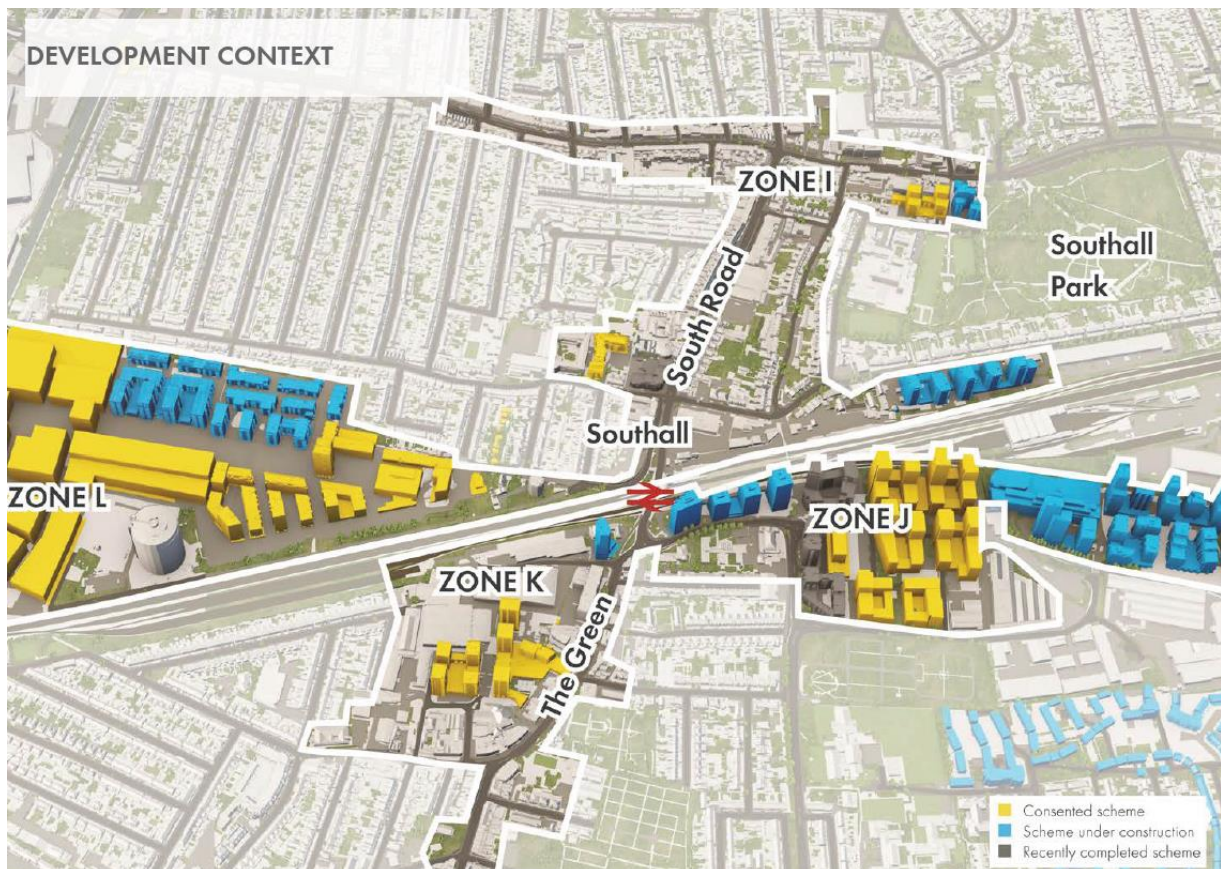


Appropriate locations



Neighbourhoods

## DEVELOPMENT CONTEXT





### Site 01NO – Northolt Car Sales

A similar issue arises with Site 01NO – Northolt Car Sales, where the indicative height was reduced from 12 storeys in the Regulation 18 draft Local Plan to ‘up to 10 storeys’ in the Regulation 19 version. This change appears to lack a clear justification and similarly risks limiting the potential of the site.

In addition, it would not reflect the Council’s aspiration for this site as set out in the site allocation as follows:

*Given its prominent location and gateway status, proposals should offer an aspirational landmark scheme that optimises the capacity of the site, with potential to improve and enhance the public realm, especially the leisure centre square.*

We therefore recommend that the site allocations for both Southall Sidings (02SO) and Northolt Car Sales (01NO) be amended to remove references to “up to 6 storeys” and instead refer to “appropriate building heights”, supported by design and contextual analysis. This would ensure the policy is evidence-based, effective, and sound, and would allow for the optimisation of these strategically important sites.

### Site 03AC – Ealing Common Depot

A response regarding height in relation to our Ealing Common Depot site has been provided separately by Carter Jonas.

## **Matter 7: Climate Change, the Environment and Healthy Places**

### **Issue: Environment and Healthy Places**

*Q9b. In terms of the local variation to Policy G6 of the London Plan: b. is the 20% biodiversity net gain requirement justified through evidence, including for proposals of different typologies and in lower land value areas?*

Places welcomes the Council’s Suggested Minor Modification (SMM143) (S24 – Schedule of Suggested Modifications, Nov 2024) to draft Policy G6F, which now aligns the biodiversity net gain (BNG) requirement with the national standard as set out in the National Planning Practice Guidance. This clarification is a positive step as it encourages and supports delivery of BNG above the minimum standard.

## **Matter 9: Development Sites**

### **Site specific questions: Northolt Development Sites**

#### **01NO – Car Sales Site and Northolt Leisure Centre**

*63. How have biodiversity/green corridor issues been taken into account? Will the design principle of re-provision on site or on adjacent site be effective?*

TfL/Places and Ealing Council Regeneration team jointly commissioned in November 2022 a Preliminary Ecological Appraisal. This assessment covered the Site of Importance for Nature Conservation (SINC), which includes the proposed development site and additional adjacent land owned by Places. The redline boundary of the assessed area is shown below:



The appraisal found that the habitat condition of the SINC ranged from Poor to Moderate, with no ecological value identified on the hardstanding part of the SINC. Please see table below.

**Table 4. Habitat Classification Conversion (Baseline)**

Phase 1 Habitat Classification	UK Habitat Classification	Habitat Condition Sheet	Habitat Condition Assessment	Pass/Fail	Assigned Condition
Hardstanding	Vacant/derelict land	N/A	N/A – habitat is covered under ruderal/ephemeral	N/A	N/A
Broadleaved woodland – semi-natural	Other woodland; broadleaved	Woodland	Young woodland with machinery damage and flytipped litter	Pass	Moderate (2) (Scoring 26/39 in metric 3.1)
Ephemeral/short perennial and Tall Ruderal	Ruderal/Ephemeral	Urban	Ruderal/ephemeral habitat with a range of scrub, grassland and herb habitat found within the derelict land and on the railside embankment. There is a diverse range of flowering plants including non-native plants e.g. butterfly brush.	Pass	Moderate (2) (Passes 2/3 criteria in metric 3.1)
Dry ditch	Ditch	Ditch	Water in ditch is poor quality and are not maintained. The ditch is heavily shaded by adjacent woodland and tall marginal vegetation	Fail	Poor (1) (Passes 5/8 criteria in metric 3.1)

As advised in the Preliminary Ecological Appraisal, should redevelopment of the SINC be proposed, a range of ecological enhancements could be implemented to support biodiversity and green corridor functionality. These may include:

- Planting of benefit to biodiversity, including species beneficial to badgers
- Log piles to provide habitat for invertebrates;
- Native hedge planting;
- Green roofs/walls integrated into building design;
- Installation of Bird houses;
- Provision of bat boxes;
- Mammal ramps and hedgehog walkways;
- Sustainable Drainage Systems (SuDS).

These measures are intended to ensure that ecological value is maintained or enhanced, whether reprovision occurs on-site or on an adjacent SINC land.

*64. Are any trees on or near the site the site subject to a tree preservation order?*

*65. In light of Historic England's comments, have potential effects on heritage assets been considered and appropriately addressed?*

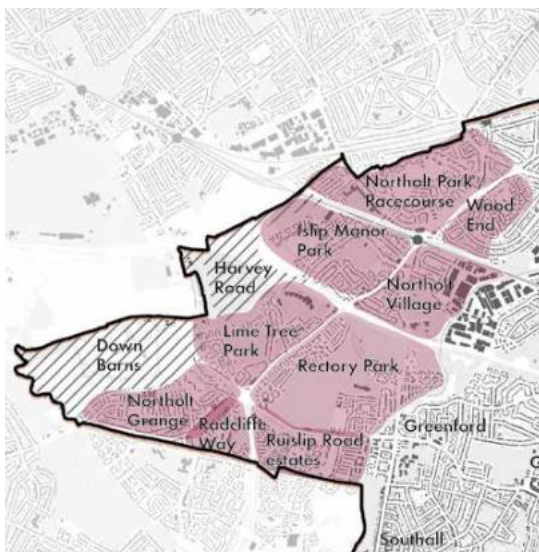
The LB Ealing Site selection report for Regulation 19 Local Plan Appendix E: Results (January 2024) provides a qualitative assessment of heritage considerations for Site 01NO – Car Sales site and Northolt Leisure Centre (pg 214):

*No designated/non-designated HAs on site. Nearest LB to south at St Marys Church GI (500m) and Scheduled Moat (405m) to south. Nearest CA is Northolt Village CA to south (125m). Nearest LLB to south along Station Parade (180m). Possible mitigation through sensitive design/ reduced capacity.*

The Ealing Character Study (January 2022) further distinguishes the character areas north and south of Northolt station; it categorises the area to the north of Northolt station as Northolt Park Racecourse and the area to the south as Northolt Village with the following narratives:

**Northolt Park / Racecourse** *To the north of Northolt station and centred around Northolt Park, this neighbourhood has suburban terraces and semis, urban cul-de-sacs and slab blocks set in open space. Northolt Park station at the north provides a connection with LB Harrow, including Alexandra Park.*

**Northolt Village** *The historic core of Northolt, with Grade I Listed St Mary's Church, former Northolt Manor, Belvue Park to the east of this and a rural character to Ealing Road, running through the village. The Crown pub sits centrally within the village but is not listed.*



It is recognised that there are a number of heritage assets to the south of the site which sit within the Northolt Village character area. However, none of these assets are directly adjacent to the proposed development site and this separation is further reinforced by the local topography which rises and falls either side of the railway line.

Initial feasibility studies undertaken by Places and Ealing Council Regeneration team indicate that sensitive design—as referenced in the site selection report—can effectively mitigate potential impacts on heritage assets. These studies suggest that building heights of approximately 10 - 12 storeys could be achieved without adversely affecting the setting of nearby heritage assets, thereby optimising the site while respecting its historic context.



It is noted that in submission document S2I– *Statement on Consultation (November 2024) Appendix* (entry I648) the Council have responded to Historic England’s comments and suggested additional ‘overarching principles’ wording on heritage to further support the assessment of Development Sites. This reinforces the need for careful assessment of any impact on heritage assets whilst supporting a design-led approach to determine the optimum development capacity of a site in line with Policy GG2 in the London Plan.

*66. Are the anticipated arrangements in respect of leisure centre parking justified and will they be effective in assisting with the delivery of sustainable development?*

Places welcomes the Council’s Suggested Minor Modification (SMM94) (S24 - Schedule of Suggested Modifications, Nov 2024) to the 01NO Car Sales Site and Northolt Leisure Centre draft development site on the I2th ‘design principle’ on car parking, which promotes active travel for leisure centres users while ensuring that parking spaces are retained for disabled users. General parking provision is considered unlikely to be justified, and this approach aligns with sustainable development goals. Notably, this modification was agreed with Transport for London in October 2024 through a Statement of Common Ground.

## Southall Development site

### 02SO – Southall Sidings

*89. Is allocation of the site justified in respect of its potential effects on biodiversity?*

*90. Is allocation of the site justified in respect of its potential effects on protected trees?*

*Do the capacity expectations of the site to accommodate development reflect any relevant constraints?*

Housing capacity expectations should reflect implemented full planning permission (Ref 20I888FUL) which is for 460 homes.

*91. Is modification needed to the requirements in relation to parking needed for general conformity with the London Plan?*

No. Maximum car parking policies are clearly set out in the London Plan and do not need to be repeated.

## Hearing Sessions for Block 2

We have requested to attend the Ealing New Local Plan hearing sessions for Block 2 to contribute to discussion on Matter 9 and the need to deliver tall buildings (draft Local Plan and London Plan Policies D9), including their role in optimising housing delivery. This matter is particularly relevant to our Sites:

- Site 02SO – Southall Sidings
- Site 03AC – Ealing Common Depot

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