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UNITED KINGDOM

13 June 2025

Project/File: 333135353/A5/AK

Mr D. McCreery and Ms C Dillon  
The Planning Inspectorate  
c/o Paige Gaughan  
Local Plan Programme Officer  
Ealing LPA

Dear Sir/Madam,

**ACTON GARDENS MASTERPLAN, ACTON, W3  
DRAFT EALING LOCAL PLAN (EXAMINATION STAGE)  
SITE ALLOCATION 02AC  
HEARING STATEMENT UNDER BLOCK 2 (MATTER 9)**

This Hearing Statement has been prepared on behalf of Acton Gardens LLP and in conjunction with LB Ealing, in support of Site Allocation 02AC (Acton Gardens) included in the London Borough of Ealing's Regulation 19 Local Plan, dated 28<sup>th</sup> February 2024 (examination library reference S1).

Representations were previously submitted at the Regulation 18 and 19 stages; this Statement sets out further information in respect of the site, the numbers proposed for the draft allocation, and its deliverability against National Planning Policy Framework ('NPPF') criteria.

Following review of the Inspectors' Matters, Issues and Questions, we have structured this Statement in two parts:

- Part 1 (Matters, Issues & Questions) responds to the relevant questions under Block 2 (Matter 9).
- Part 2 (Further Information) provides further detail on the Acton Gardens development site, its deliverability and its potential.

Acton Gardens LLP and LB Ealing officers have maintained regular dialogue and engagement in respect of the site throughout the Local Plan process, and are now in agreement with respect to Site Allocation 02AC.

Reference: ACTON GARDENS MASTERPLAN, ACTON, W3

## **MATTERS, ISSUES AND QUESTIONS**

Acton Gardens LLP set out below their responses to the questions raised by the Inspectors. The responses are set out in the order they appear in the Inspectors' MIQs. The Inspectors should assume that no comment is made in respect of the questions that have not been included below.

### **Matter 9: Development Sites**

#### **Question 10 (Site Specific Question):**

*For each proposed development site, please set out:*

*[...]*

- c. how the boundaries and extent of the site have been defined and justified;*
- d. for housing allocations, the anticipated capacity of the site and whether this is justified;*
- e. for commercial development, the estimated floorspace and whether this is justified;*
- f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;*

*[...]*

#### **Response:**

As discussed and agreed with LB Ealing officers, we provide responses below in respect of parts c., d., e. and f. of Question 10, specifically in respect of Site Allocation 02AC (Acton Gardens):

- c. The boundaries for Site Allocation 02AC have broadly been defined in line with the remaining phases to be delivered at Acton Gardens, based on the outline permission. These boundaries have been discussed and agreed between Acton Gardens LLP and LB Ealing officers, and are considered to be acceptable.
- d. Around 2,000 gross units, or 1,564 net units, are considered to be deliverable at Acton Gardens. This is based on the extant permission, historic optimisation of previous phases at the site, and the evolving context since outline permission was originally granted. This revised figure has been discussed with LB Ealing officers following the previous round of consultation on the draft Local Plan.
- e. No more than 1,000sqm of flexible commercial space across all of Acton Gardens, in line with the extant permission. This is justified given the historic consent.
- f. Completions at the site are expected between September 2029 and November 2039; the below table provides a detailed breakdown per phase:

Phase	Anticipated Completion Date
7.2	Sep 29
7.4	Dec 30
7.5	May 31
7.3	Mar 33

**Reference:** ACTON GARDENS MASTERPLAN, ACTON, W3

Phase	Anticipated Completion Date
10.1	May 34
8.3	Aug 35
10.2	Feb 36
11.1	Feb 37
11.2	Nov 39

These assumptions are based on historic delivery at the site, and Acton Gardens LLP's extensive understanding of the site.

On this basis, the site is considered to be deliverable against the NPPF criteria, as the site is available now, is a suitable location for development given the extant permission, and is capable of delivering housing within the next five years.

Question 11 (02AC – Acton Gardens):

*Is modification to the site boundary (highlighted in the Council's response to Initial Questions dated 10 January 2025 [EX3]) necessary for soundness?*

Response:

As above, the latest modifications to the site boundary have been discussed and agreed between Acton Gardens LLP and the London Borough of Ealing.

The latest site boundary is considered to be sound, and no further amendments to the boundary are required.

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## **FURTHER INFORMATION**

### **The Site & Permissions**

The Acton Gardens site represents a key strategic housing site for Ealing, and Acton Gardens LLP have had a long-term involvement in the redevelopment of the Acton Gardens estate.

Planning permission was granted in 2012 for the original masterplan (ref: P/2012/0708), which comprised the delivery of up to 2,440 homes. A total of 1,346 were delivered pursuant to the Outline Application, following which a new masterplan application (ref: 182579OUT) was submitted and approved in December 2018, resulting in an uplift of 856 units above what was originally permitted.

Phases 8.1 and 8.2, as well as 9.3, 9.4, 9.5 and 9.6, have received reserved matters approval and are being delivered under these permissions. As such, these phases are not included in the Site Allocation boundary.

Delivery on the site has been steady and consistent since the original masterplan was granted, and is expected to continue in the future. Phases on the wider Acton Gardens site have been delivered as follows:

- *Phase 1 (167 homes):* completed 2013
- *Phase 2 (106 homes):* completed 2015
- *Phase 3.1 (124 homes):* completed 2017
- *Phase 3.2 (116 homes):* completed 2017
- *Phase 4 (107 homes):* completed 2017
- *Phase 5 (271 homes):* completed 2018
- *Phase 6 (308 homes):* completed 2020
- *Phase 7.1 (246 homes):* completed 2020
- *Phase 9.1 (68 homes):* completed 2020
- *Phase 9.2 (203 homes):* completed 2022
- *Phase 9.4 (209 homes):* completed 2023

Acton Gardens LLP remain committed to progressing the site and delivering the homes Ealing needs, and are on-site delivering the 1,000<sup>th</sup> affordable home on Acton Gardens, demonstrating their commitment to the permission.

### **Residential Numbers Remaining (2018 Masterplan)**

A total of 1,950 units are approved under the 2018 masterplan; 963 units have been approved and are being delivered against this upper limit (comprising phases 8.1, 8.2, 9.2, 9.3, 9.4, 9.5 and 9.6, but excluding Phase 7.2). As such, there are 1,014 gross units remaining to be delivered.

The latest data shows that there are 319 secure tenancy households, 69 Leaseholders and 48 Property Guardian at Acton Gardens in the future phases, amounting to 436 households in total. These homes will be replaced as part of the development, and the remaining provision is therefore at 578 net units.

### **Site Aspirations**

As has been noted in our previous representations, we believe the site has potential to deliver an increased number of units beyond the approved outline permission. Whilst previously this number has been stated as 1,200 units (gross), from further review of the surrounding context and site opportunities,

**Reference: ACTON GARDENS MASTERPLAN, ACTON, W3**

it is believed that this number could be increased, and that a total of c. 2,000 gross units, or c. 1,564 net units, could be delivered at the site.

### The Permission

An emphasis on flexibility in the permission has allowed for continuous optimisation of future phases, with the Regulation 18 Representations highlighting a general increase in the amount of units per Phase by circa 15.6% (17.7% when excluding Phase 7.2).

As such, it is clear that flexibility has been at the forefront of the permission and the project, and that this has enabled the site to be optimised over time. It is also considered, and elaborated upon in the Regulation 18 Representations, that there are no infrastructure or heritage matters which are considered to constrain future optimisation.

Applying the previous levels of optimisation to the remaining Phases, it is considered that c. 1,200 units (gross) could be achieved through good design, and within the parameters of the outline permission.

### The Surrounding Context

Since the 2018 masterplan was approved, a number of permissions have subsequently been granted, which have significantly increased surrounding heights.

Whilst historically the South Acton industrial estate primarily comprised one- to two-storey buildings, approved developments all exceed 10 storeys, with Acton Works (ref: 201379OUT) reaching up to 25 storeys.

Development within the South Acton industrial estate has been driven by the South Acton LSIS Masterplan. Whilst the Site Allocation does not fall within the South Acton LSIS Masterplan area, it is important to note this document, as it provides a framework for development coming forward in the South Acton area. As part of the document, a building heights diagram has been developed, which establishes the principle of tall buildings as a 'typical block' massing across the majority of the site; below is an extract of the plan:



**Reference:** ACTON GARDENS MASTERPLAN, ACTON, W3

Given the heights proposed across the South Acton industrial estate, the four to six storeys which predominate the remaining Acton Gardens phases are considered to underutilise the site, and a general increase in height of multiple storeys is considered to be achievable on the remaining area of Acton Gardens; this would also optimise the site, in line with London Plan policy.

This approach is further supported by PTAL levels in the area, as the PTAL increases going north towards Acton Town; as such, the remaining Acton Gardens phases are in a more sustainable location than the remainder of the site, or the South Acton industrial estate.

The additional height which could be achieved, in tandem with optimisation through good design as has taken place through previous phases, will enable the remaining Acton Gardens phase within Site Allocation 02AC to achieve 2,000 units (gross).

### Phasing Programme

Below is an indicative phasing programme for the remaining phases to be captured under Site Allocation 02AC:

Phase	Anticipated Completion Date
7.2	Sep 29
7.4	Dec 30
7.5	May 31
7.3	Mar 33
10.1	May 34
8.3	Aug 35
10.2	Feb 36
11.1	Feb 37
11.2	Nov 39

### Deliverability against the NPPF

As set out in NPPF paragraph 72, planning policies ‘*should identify a supply of:*

- a) *specific, deliverable sites for five years following the intended date of adoption; and*
- b) *specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.’*

The NPPF Glossary (Annex 2) then defines ‘deliverable’ as follows:

**Deliverable:** *To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

- a) *sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) *where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register,*

**Reference:** ACTON GARDENS MASTERPLAN, ACTON, W3

*it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

### Analysis

As noted above, the site historically benefits from extant outline permission, and therefore falls within category b) of the definition of 'deliverable'.

Furthermore, we set out below how the draft Acton Gardens Site Allocation 02AC meets the key criteria set out in the main definition:

- Available now: the site benefits from an extant outline permission, and development of a number of the previous Acton Gardens phases has/is taking place; the site is therefore available now for development.
- Offer a suitable location for development now: the site is in a sustainable urban location, and is bounded by historic Acton Gardens phases; as such, the site allocation is in a suitable location for development now.
- Realistic prospect that housing will be delivered on the site within five years: reserved matters applications have steadily been approved year-by-year, and delivery has followed suit. Furthermore, the above phasing programme indicates a clear intention from Acton Gardens LLP to continue delivering housing completions within the next five years, and beyond. As such, there is clear evidence that housing can be delivered within five years.

On this basis, it is evident that the site can be considered deliverable against the definition set out in the NPPF.

### **Conclusions**

Acton Gardens is a key development site in Ealing, and Acton Gardens LLP are fully committed to the masterplan's delivery. Continuous housing delivery has historically taken place at the site, and as set out in the phasing programme above, a steady supply of housing completions is anticipated at the site in future years. As such, the site is therefore considered to be deliverable against the NPPF criteria, and is therefore a suitable site for allocation.

There has been historic optimisation of phases within Acton Gardens when compared to the indicative numbers set out in the 2018 masterplan. Furthermore, the surrounding context, most notably the South Acton industrial estate, has significantly changed since the 2018 masterplan was approved, and prevailing heights are now much higher.

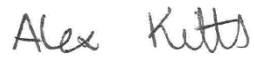
On this basis, it is considered that there is substantial opportunity to deliver an increased quantum and density of residential development within the remaining Acton Gardens phases which form part of Site Allocation 02AC. At this stage, it is anticipated that these phases have the potential to deliver c. 2,000 units (gross) or c. 1,564 net units.

The quantum proposed to form Site Allocation 02AC will assist LB Ealing in achieving their five-year housing land supply, and will ensure a sufficient number of homes are delivered going forward.

**Reference:** ACTON GARDENS MASTERPLAN, ACTON, W3

Yours sincerely,

**STANTEC UK LIMITED**

A handwritten signature in black ink that reads "Alex Kitts". The signature is written in a cursive, slightly informal style.

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