

Council Response to Inspectors' Additional Question Regarding Emerging and Allocated sites

This note sets out the policy context, methodology and evidence to demonstrate the deliverability or developability of emerging sites that are currently allocated in the adopted 2013 Development Sites DPD. Details of each specific site and its assessment is set out in Appendix A.

1. Policy Context

1.1 The National Planning Policy Framework (NPPF) states that to be considered **deliverable**, sites for housing should:

- Be available now
- Offer a suitable location for development now
- Be achievable with a realistic prospect that housing will be delivered on the site within five years

1.2 To be considered **developable**, the NPPF states that sites should:

- Be in a suitable location for housing development
- Have a reasonable prospect that the site will be available and could be viably developed at the point envisaged (typically after year five of the plan period)

1.3 The NPPF also notes the following methods in contributing towards housing requirements:

- Small and medium sized sites
- Brownfield registers
- Through tools such as area-wide design assessments and Local Development Orders
- Windfall sites (as long as “compelling evidence” is given showing that they will provide a reliable source of supply, through having realistic regard to the SHLAA, historic windfall rates, and expected future trends)
- The sub-division of larger sites to speed up the delivery of homes

2. Methodology used to determine deliverability of sites proposed for allocation

2.1 At the Regulation 18 Stage, 123 potential development sites were initially identified for assessment including 18 new sites arising from a “Call for Sites.” Following this assessment and taking into account representations received at Regulation 18 Consultation, the selected

sites were then assessed for suitability and deliverability to provide the final list of proposed site allocations included in the Regulation 19 Local Plan.

2.2 The Site Selection Report for Regulation 19 Local Plan, 2024 (SSR 2024) {EB102}, SSR 2024 Appendices A- D {EB103} and SSR 2024 Appendix E: Results {EB104} sets out the methodology of how sites for the Local Plan were selected and assessed for suitability and deliverability and the results of the assessment of each site before its inclusion as a proposed site for allocation in the Regulation 19 Local Plan.

2.3 Below are details of the deliverability criteria used for the Regulation 19 site assessment (see SSR 2024 Appendix D {EB103}). The first two criteria concerning Availability were used for the Regulation 18 site assessment and were combined with additional Availability and Achievability criteria for the Regulation 19 site assessment

2.4 In summary, the deliverability assessment criteria used for the **Regulation 18 stage** comprised:

Deliverability Criteria -:

Availability:

- Safeguarded alternative uses
- On-site restrictions

Additional deliverability assessment criteria were used for **Regulation 19 stage** and these included:

Additional Deliverability Criteria -:

Availability:

- Ownership
- Existing use(s)
- Planning status
- Availability within plan period and readiness of site for development
- On-site physical infrastructure constraints

Achievability:

- Site marketability
- Viability considerations

2.5 Details of each of the **additional deliverability** assessment criteria used for assessment at **Regulation 19** are shown below:

1. Ownership:

(+)	0	(-)
Site is in single ownership.	Site is in multiple ownership where landowners are promoting independent schemes that are not in conflict, or working collaboratively on a scheme, and there is an agreement in place between the parties.	Site ownership is unknown or is in multiple ownership and the other owners are either unknown, oppose the development or are promoting another conflicting scheme.

Quantitative Assessment

Information provided or gathered in the land promoter / developer surveys, Regulation 18 consultation and Call for Sites submissions together with other intelligence was primarily used to inform this assessment.

If site ownership details are unknown a score of (-) will be assigned.

2. Existing uses(s):

(+)	0	(-)
Site is vacant and/or has existing use that is surplus to requirements.	Site is in active use but could be reprovided as part of development.	Site is in current active use, which may need to be relocated (e.g., business or community use includes recreational open space).

Quantitative Assessment

Information provided or gathered in the land promoter / developer surveys, Regulation 18 consultation and Call for Sites submissions together with other intelligence was primarily used to inform this assessment.

This was supplemented by desk-based research to establish current on-site land uses, drawing on aerial photography, council records and planning history. In these cases, based on the identified land use, an element of professional judgement was required to determine whether the site would or would not be available during the plan period, or whether the timescale for uses to cease was

unknown.

3. Planning Status:

(+)	0	(-)
Known developer interest in bringing the site forward	Imminent, live or granted planning application; or existing preapplication advice identifying a clear vision for whole or part of the site; or expired consent; or no relevant planning history.	Whole or part of the site is already under construction.

Quantitative Assessment

GIS analysis was used to flag relevant planning history for the preferred sites, based on the planning history GIS address points overlaid with the preferred site polygons.

Qualitative Assessment

Given the extensive planning history relating to the preferred sites, it was necessary to review the data export to identify the most relevant planning history, including:

- Identifying the most relevant application/ pre-application information for the purposes of this site selection exercise, using knowledge of the sites' planning history.
- For all relevant applications, comparing the application boundaries and preferred site boundaries to understand whether there is a full or partial overlap (so it is clear whether the planning history relates to all or only part of the site).
- Extracting information on the existing on-site uses and proposed on-site uses (including quantum and mix of uses and whether the uses are active); and
- Recording which sites may be wholly or partially under construction.

This was supplemented with additional information provided in the land promoter / developer surveys, Regulation 18 consultation and Call for Sites submissions.

4. Availability within plan period and readiness of site for development:

(+)	0	(-)
Site is expected to be available within 0-5 years.	Site is expected to be available in 6-15 years.	Site will not be available within the plan period.

Qualitative Assessment

As outlined in the PPG (Paragraph: 019 Reference ID: 3-019-20190722), “a site can be considered available for development, when, on the best information available (confirmed by the Call for Sites and information from landowners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available.”

The PPG continues that “the existence of planning permission can be a good indication of the availability of sites. Sites meeting the definition of deliverable should be considered available unless evidence indicates otherwise. Sites without permission can be considered available within the first five years, further guidance on this is contained in the 5-year housing land supply guidance. Consideration can also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions.

Taking into account the above, the scoring was primarily undertaken based on responses in the land promoter / developer surveys, Regulation 18 consultation and Call for Sites submissions. Where this information is not available, the following assumptions were adopted:

- It was assumed for all sites where pre-application enquiries had been received by the council or where planning applications had been submitted that the site is likely to be available immediately and a score of (+) will be assigned, with this judgement stated in the assessment.
- It was assumed for the purposes of this assessment that if site availability was unknown and a score of (-) will be assigned accordingly.

5. Site Marketability:

(+)	0	(-)
Site is under option to a developer	Site is being actively marketed for development or enquiries have been received from a developer	Site is not being actively marketed

Qualitative Assessment

The scoring will be undertaken with reference to responses provided in the land promoter / developer surveys, Regulation 18 consultation and Call for Sites submissions in the first instance.

Where this information is not available, the following assumptions were adopted:

- It was assumed for all sites where pre-application enquiries had been received by the council or where planning applications had been submitted that the site is being actively marketed and a score of 0 will be assigned. This is assumed given these sites are being actively promoted for development through the planning process.
- Otherwise, it was assumed that the site has not been marketed for development and a score of (-) will be assigned.

6. Viability considerations:

(+)	0	(-)
No viability issues known to developers / landowners	Potential viability constraints based on professional knowledge and engagement with developers; or viability constraints are unknown through lack of evidence	Significant viability constraints

Qualitative Assessment

The PPG (Paragraph: 003 Reference ID: 10-003-20180724) states that “Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Plan makers can use site typologies to determine viability at the plan making stage. Assessment of samples of sites may be helpful to support evidence. In some circumstances more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies.”

This criterion was assessed using information provided in the land promoter / developer surveys, Regulation 18 consultation and Call for Sites submissions in the first instance. Where relevant site-specific responses were not received, reference was made to viability assumptions made by the council.

7. On-site physical infrastructure constraints:

(+)	0	(-)
There are no known on-site constraints which would impact upon deliverability	On-site constraints have been identified but mitigation or design solutions mean that any impact can likely be managed or mitigated.	Identified on-site constraints may impact upon deliverability

Qualitative Assessment

The assessment considered whether there were any known on-site physical or infrastructure constraints and the extent to which these might impact upon the deliverability of development.

Reference was made to the suitability assessments relating to flood risk, access, and contamination and bolstered using information provided in the land promoter / developer surveys on the following constraints:

- Flood risk / drainage;
- Contamination;
- Topography;
- Mains water supply;
- Mains sewerage;
- Electricity supply;
- Gas supply;
- Highways provision and / or capacity;
- Telecoms; and
- Other

Where a constraint is identified, respondents were asked to identify how this would be mitigated. Scores were awarded on the basis of the identification of mitigation measures, or sufficient demonstration that identified constraints will not impact upon deliverability (for example, in cases where there were no existing utilities connections but where nearby grid supplies were available). An element of professional judgement helped determine the final score.

Where promoter responses were not received, reference was made to the information from other sources including the Infrastructure Delivery Plan. Where no information is available from either the survey or other sources, sites were assigned a score of (+), as no constraints are identified.

3. Evidence to demonstrate deliverability or developability of sites

3.1 The Site Selection Report, 2024 (SSR 2024) for Regulation 19 {EB102} and appendices {EB 103} and {EB104} form the basis for the response to the Inspectors' question above. See Appendix A for a detailed assessment of each site that demonstrates whether it is deliverable or developable.

3.2 The sites that meet the above criteria of emerging and allocated and not subject to planning permission are:

Emerging Allocation (Reg 19)		Current Allocation in Development Sites DPD, 2013
01AC	Acton Gateway (Morrisons)	ACT2 Acton Gateway
01EA	Broadway Connection & Arcadia	EAL3 Arcadia
02EA	Ealing Broadway Shopping Centre & Crystal House	EAL4 Ealing Broadway Shopping Centre
04EA	Eastern Gateway	EAL1 Eastern Gateway
06EA	49 - 69 Uxbridge Road	EAL8 49 - 69 Uxbridge Road
10EA	59 - 65 Broadway, West Ealing (Lidl)	EAL16 59 - 119 Broadway and New Ealing House, West Ealing
11EA	Sainsbury's & Library, West Ealing	EAL16 59 - 119 Broadway and New Ealing House, West Ealing
13EA	99 - 113 Broadway, West Ealing	EAL16 59 – 119 Broadway and New Ealing House, West Ealing
05GR	Former Greenwich School of Management	OIS7 Greenford Green
02HA	Gray's Garage	HAN2 144 - 164 Uxbridge Rd & 1 - 3 Westminster Terrace
01SO	Southall Crossrail Station and Gurdwara	SOU4 Southall Crossrail Station
03SO	Former Sorting Office & Kings Hall Methodist Church	SOU3 Beaconsfield Road, South Road
05SO	31 - 45 South Road & Telephone Exchange, Quality Foods & Iceland	SOU2 Iceland, Quality Foods and 63 - 95 South Road
07SO	The Limes, Maypole Court, Banqueting Centre, 13 - 19 The Green	SOU6 Southall East

APPENDIX A:

Detailed Assessment of Each Site

01AC Acton Gateway (Morrisons)

SSR 2024 Appendix E: results {EB104} provides a deliverability assessment **summary** for the site that says:

The site scores fairly well across the deliverability criteria, that it is situated in a strategic location with single ownership and that the site has been marketed by LB Ealing as part of its Inward Investment Programme, with development expected to come forward within 6 - 15 years.

Deliverability Assessment: Availability		
Criteria	Score	
Ownership		Site is in single ownership.
Existing use(s)		Site is in active use but could be reprovided as part of development.
On-site restrictions		There are no known on- site constraints which would impact upon deliverability.
Planning status		Imminent, live or granted planning application; or Existing reapplication advice identifying a clear vision for whole or part of the site; or Expired consent; or No relevant planning history.
Availability within plan period and readiness of site for development		Site is expected to be available in 6-15 years.

Deliverability Assessment: Achievability		
Criteria	Score	
Site marketability		Site is being actively marketed for development or enquiries have been received from a developer.
Viability considerations		Potential viability constraints based on professional knowledge and engagement with developers; or Viability constraints unknown through lack of evidence.

Further Information:

- The emerging site's boundary remains the same as that of the currently allocated site.
- The site has been subject to informal pre application advice.
- No objections to the site's inclusion as an allocation were received from the landowner during either the Regulation 18 or Regulation 19 consultations.
- The site is included in the Brownfield Register.
- The indicative timetable for delivery of this site is 6 – 15 years.
- The site meets the NPPF definition of developable land as it is in a suitable location, has a reasonable prospect of being available and is viable for mixed-use redevelopment within the plan period.
- The site is therefore appropriate for allocation in the emerging Ealing Local Plan and contributes to meeting strategic, regeneration and placemaking objectives.

01EA Broadway Connection & Arcadia

SSR 2024 {EB103} provides a deliverability assessment **summary** for the site that says:

The site scores averagely across the deliverability criteria for this key strategic site. The expansion of the Reg 18 site to include the Arcadia Shopping Centre for Reg 19 has slightly lowered the overall deliverability of the expanded site in comparison due to ambitions for tall buildings on the Arcadia part of the site, which are not supported. With an extant planning consent on the eastern part of the site, it is still expected that owners will work collaboratively towards a cohesive, integrated development whether it comes forward as a whole or in part. Development is expected to come forward within 6 - 10 years.

Deliverability Assessment: Availability		
Criteria	Score	
Ownership		Site is in multiple ownership where landowners are promoting independent schemes that are not in conflict, or working collaboratively on a scheme, and there is an agreement in place between the parties.
Existing use(s)		Site is in active use but could be reprovided as part of development.
On-site restrictions		On-site constraints have been identified but mitigation or design solutions mean that any impact can likely be managed or mitigated.
Planning status		Imminent, live or granted planning application; or Existing reapplication advice identifying a clear vision for whole or part of the site; or Expired consent; or No relevant planning history.
Availability within plan period and readiness of site for development		Site is expected to be available in 6-15 years.

Deliverability Assessment: Achievability		
Criteria	Score	
Site marketability		Site is being actively marketed for development or enquiries have been received from a developer.
Viability considerations		Potential viability constraints based on professional knowledge and engagement with developers; or Viability constraints unknown through lack of evidence.

Further information:

- The emerging site's boundary differs from the currently allocated site: the area including the railway line to the north, Haven Green Car Park and Central Chambers have been excluded from the proposed site allocation boundary. Haven Green Car Park and Central Chambers were originally included as proposed individual site allocations at Regulation 18 (EA06 and EA05 respectively). Haven Green Car Park was excluded following representation from the owners who confirmed that the site was only likely to come forward after 15 years, beyond the timeframe of this local plan. Central Chambers is a small site, and no representation was received from the owners to express a view on its inclusion, therefore it was felt that there was no justification to include it as a site allocation. The exclusion of the railway track was due to the huge and therefore prohibitive costs that would be incurred in decking over the tracks.
- The Broadway Connection part of the site is subject to an extant planning permission 223774FUL.
- The owners of the Arcadia Shopping Centre, Investra Capital submitted representations at Regulation 19 and a hearing statement for Matter 9 of the Local Plan Examination (representor no. 678) fully supporting the inclusion of the Arcadia Shopping Centre within the proposed site allocation.
- The Broadway Connection part of site is included in the Brownfield Register
- The indicative timetable for delivery of this site is 6 – 10 years.
- The site meets the NPPF definition of developable land as it is in a suitable location, is available and is viable for office and mixed-use redevelopment within the plan period.
- The site is therefore appropriate for allocation in the emerging Ealing Local Plan and contributes to meeting strategic, regeneration and placemaking objectives.

02EA Ealing Broadway Shopping Centre & Crystal House

SSR 2024 {EB103} provides a deliverability assessment **summary** for the site that says:

The site scores well across the deliverability criteria. The deliverability of any redevelopment of this key strategic site should be fairly straightforward with no known viability issues and both landowners likely to work together to bring forward a cohesive scheme. Development is expected to come forward within 6 - 15 years.

Deliverability Assessment: Availability		
Criteria	Score	
Ownership		Site is in multiple ownership where landowners are promoting independent schemes that are not in conflict, or working collaboratively on a scheme, and there is an agreement in place between the parties.
Existing use(s)		Site is in active use but could be reprovided as part of development.
On-site restrictions		Site is not subject to any known restrictions.
Planning status		Imminent, live or granted planning application; or Existing reapplication advice identifying a clear vision for whole or part of the site; or Expired consent; or No relevant planning history.
Availability within plan period and readiness of site for development		Site is expected to be available in 6-15 years.

Deliverability Assessment: Achievability		
Criteria	Score	
Site marketability		Site is under option to a developer.
Viability considerations		No viability issues known to developers / landowners.

Further information:

- The emerging site's boundary remains the same as that of the currently allocated site.
- Landowners British Land and Marks & Spencer's submitted representations at Regulation 18 supporting the inclusion of their sites as part of the wider site allocation. British Land stated that the refurbishment of Crystal House has been delivered; the refurbishment and extension of International House has been permitted and will come forward in the short term. The refurbishment and improvement to the shopping centre is continuous and ongoing. It is only the introduction of new residential development where the time-frame of "beyond five years" may be applicable.
- Marks & Spencer submitted a representation at Regulation 19 reiterating their support for the inclusion of the site as part of wider draft allocation 02EA.
- 54 The Broadway, located within the proposed site allocation is being actively marketing through Ealing Metropolitan Centre Investment Programme (2025).
- The site is included in the Brownfield Register
- The indicative timetable for delivery of this site is 6 – 15 years.
- The site meets the NPPF definition of developable land as it is in a suitable location, is available and is viable for a retail led mixed-use redevelopment within the plan period.
- The site is therefore appropriate for allocation in the emerging Ealing Local Plan and contributes to meeting strategic, regeneration and placemaking objectives.

04EA Eastern Gateway

SSR 2024 {EB103} provides a deliverability assessment **summary** for the site that says:

The site scores variably across the deliverability criteria. This important gateway site has been reduced in size from the Reg 18 site to take into account the recent redevelopment of western part of the site. Single ownership and no obvious viability considerations should help to make this site deliverable. Development is expected to come forward within 6 - 10 years

Deliverability Assessment: Availability		
Criteria	Score	
Ownership		Site is in single ownership.
Existing use(s)		Site is in active use but could be reprovided as part of development.
On-site restrictions		Site is not subject to any known restrictions.
Planning status		Imminent, live or granted planning application; or Existing reapplication advice identifying a clear vision for whole or part of the site; or Expired consent; or No relevant planning history.
Availability within plan period and readiness of site for development		Site is expected to be available in 6-15 years.

Deliverability Assessment: Achievability		
Criteria	Score	
Site marketability		Site is not being actively marketed.
Viability considerations		Potential viability constraints based on professional knowledge and engagement with developers; or Viability constraints unknown through lack of evidence.

Further information:

- The emerging site's boundary differs from the currently allocated site: a small part of the eastern part of the site (51 The Mall) has been excluded because of the completion of planning permission 213658FUL to redevelop that part of the site.
- The site has been subject to informal pre application advice.
- No representations objecting to the site's allocation were received at Regulation 18 or Regulation 19 consultations.
- The site is included in the Brownfield Register
- The indicative timetable for delivery of this site is 6 – 10 years.
- The site meets the NPPF definition of developable land as it is in a suitable location, is available and is viable for a residential led mixed-use redevelopment within the plan period.
- The site is therefore appropriate for allocation in the emerging Ealing Local Plan and contributes to meeting strategic, regeneration and placemaking objectives.

06EA 49 – 69 Uxbridge Road

SSR 2024 {EB103} provides a deliverability assessment **summary** for the site that says:

The site scores variably across the deliverability criteria. Although not being marketed actively, there is enough confidence that this site should be deliverable within Plan period.

Deliverability Assessment: Availability		
Criteria	Score	
Ownership		Site is in multiple ownership where landowners are promoting independent schemes that are not in conflict, or working collaboratively on a scheme, and there is an agreement in place between the parties.
Existing use(s)		Site is in active use but could be reprovided as part of development.
On-site restrictions		Site is not subject to any known restrictions.
Planning status		Imminent, live or granted planning application; or Existing reapplication advice identifying a clear vision for whole or part of the site; or Expired consent; or No relevant planning history.
Availability within plan period and readiness of site for development		Site is expected to be available in 6-15 years.

Deliverability Assessment: Achievability		
Criteria	Score	
Site marketability		Site is not being actively marketed
Viability considerations		Potential viability constraints based on professional knowledge and engagement with developers; or Viability constraints unknown through lack of evidence.

Further information

- The emerging site's boundary remains the same as that of the currently allocated site.
- Representations were received at Regulation 19 from the Metropolitan Police who own 67 – 69 Uxbridge Road stating they supported redevelopment of their site.
- Owners of Shaftesbury House and Oak House, 49 – 51 Uxbridge Road are committed to bringing forward a proposal for their site and support the principle of development and have had pre app discussions with the GLA (Sept 2023). The owners submitted a statement in respect of Matter 9 reiterating their commitment to bringing forward a proposal for their site.
- Ealing agreed that a more piecemeal approach to development might be acceptable for this site due to multiple owners although a comprehensive development would be preferred.
- The indicative timetable for delivery of this site is 6 – 15 years.
- The site meets the NPPF definition of developable land as it is in a suitable location, is available and is viable for a commercial led mixed-use redevelopment within the plan period.
- The site is therefore appropriate for allocation in the emerging Ealing Local Plan and contributes to meeting strategic, regeneration and placemaking objectives.

10EA 59 – 65 Broadway, West Ealing (Lidl)

SSR 2024 {EB103} provides a deliverability assessment **summary** for the site that says:

The site scores variably across the deliverability criteria. The site is dominated by a well-used Lidl supermarket, and although not being actively marketed, it is in single ownership and is likely to come forward for development in the later period of the Plan.

Deliverability Assessment: Availability		
Criteria	Score	
Ownership		Site is in single ownership.
Existing use(s)		Site is in active use but could be reprovided as part of development.
On-site restrictions		Site is not subject to any known restrictions.
Planning status		Imminent, live or granted planning application; or Existing reapplication advice identifying a clear vision for whole or part of the site; or Expired consent; or No relevant planning history.
Availability within plan period and readiness of site for development		Site is expected to be available in 6-15 years.

Deliverability Assessment: Achievability		
Criteria	Score	
Site marketability		Site is not being actively marketed
Viability considerations		Potential viability constraints based on professional knowledge and engagement with developers; or Viability constraints unknown through lack of evidence.

Further information:

- The emerging site's boundary differs from the currently allocated site: the site is a smaller part of the much larger current site allocation. It was considered that a smaller site would be more likely to come forward for development, in line with the NPPF noting that the sub-division of larger sites can speed up the delivery of homes.
- Lidl has recently moved across the road to a new location, and the site is now vacant and available for redevelopment. Officers propose to change the name of site due to LIDL no longer being located on this site.
- The site has been subject to informal pre application advice.
- No objections to the site's inclusion as an allocation were received from the landowner during either the Regulation 18 or Regulation 19 consultations.
- The site is included in the Brownfield Register
- The indicative timetable for delivery of this site is 6 – 15 years.
- The site meets the NPPF definition of developable land as it is in a suitable location, is available and is viable for a commercial led mixed-use redevelopment within the plan period.
- The site is therefore appropriate for allocation in the emerging Ealing Local Plan and contributes to meeting strategic, regeneration and placemaking objectives.

11EA Sainsbury's & Library, West Ealing

SSR 2024 {EB103} provides a deliverability assessment **summary** for the site that says:

The site scores averagely across the deliverability criteria. It has mixed ownership, including council and private, and any redevelopment will need to look at reproviding the library and supermarket, which will be a viability consideration. Development is expected to come forward within 6 - 15 years.

Deliverability Assessment: Availability		
Criteria	Score	
Ownership		Site is in multiple ownership where landowners are promoting independent schemes that are not in conflict, or working collaboratively on a scheme, and there is an agreement in place between the parties.
Existing use(s)		Site is in active use but could be reprovided as part of development.
On-site restrictions		Site is not subject to any known restrictions.
Planning status		Imminent, live or granted planning application; or Existing reapplication advice identifying a clear vision for whole or part of the site; or Expired consent; or No relevant planning history.
Availability within plan period and readiness of site for development		Site is expected to be available in 6-15 years.

Deliverability Assessment: Achievability		
Criteria	Score	
Site marketability		Site is being actively marketed for development or enquiries have been received from a developer.
Viability considerations		Potential viability constraints based on professional knowledge and engagement with developers; or Viability constraints unknown through lack of evidence.

Further information:

- The emerging site's boundary differs from the currently allocated site: the site is a smaller part of the much larger current site allocation. It was considered that a smaller site would be more likely to come forward for development, in line with the NPPF noting that the sub-division of larger sites can speed up the delivery of homes.
- A representation at Regulation 18 was received in support of the proposed site allocation from key landowner, Christian Vision (77 – 83 Broadway). Christian Vision also submitted a representation Regulation 19 reiterating support for the site allocation and a request that the indicative time frame be amended from 6 – 15 years to 0 – 15 years, indicating confidence that a scheme could come forward and be developed sooner than originally anticipated (see Schedule of Suggested Modifications {S24} SMM65).
- The site has been subject to informal pre application advice for a comprehensive scheme.
- The site is included in the Brownfield Register.
- The indicative timetable for delivery of this site is 6 – 15 years.
- The site meets the NPPF definition of developable land as it is in a suitable location, is available and is viable for a residential led mixed-use scheme within the plan period.
- The site is therefore appropriate for allocation in the emerging Ealing Local Plan and contributes to meeting strategic, regeneration and placemaking objectives.

13EA 99 – 113 Broadway, West Ealing

SSR 2024 {EB103} provides a deliverability assessment **summary** for the site that says:

The site scores relatively well across the deliverability criteria. The buildings on the site are within single ownership with the council owning the public walkway in between them. There is known developer interest in developing the site, and some viability considerations regarding height of proposed development. Development is expected to come forward within 1 - 5 years.

Deliverability Assessment: Availability		
Criteria	Score	
Ownership		Site is in multiple ownership where landowners are promoting independent schemes that are not in conflict, or working collaboratively on a scheme, and there is an agreement in place between the parties.
Existing use(s)		Site is in active use but could be reprovided as part of development.
On-site restrictions		Site is not subject to any known restrictions.
Planning status		Imminent, live or granted planning application; or Existing reapplication advice identifying a clear vision for whole or part of the site; or Expired consent; or No relevant planning history.
Availability within plan period and readiness of site for development		Site is expected to be available in 0 - 5 years.

Deliverability Assessment: Achievability		
Criteria	Score	
Site marketability		Site is being actively marketed for development or enquiries have been received from a developer.
Viability considerations		Potential viability constraints based on professional knowledge and engagement with developers; or Viability constraints unknown through lack of evidence.

Further information:

- The emerging site's boundary differs from the currently allocated site: the site is a smaller part of the much larger current site allocation. It was considered that a smaller site would be more likely to come forward for development, in line with the NPPF noting that the sub-division of larger sites can speed up the delivery of homes.
- The emerging site was submitted for consideration as part of the council's Early Call for Sites.
- Representations were received from landowner at Regulation 18 confirming they were engaged in the latter stages of a planning performance agreement with the Council relating to this site, with the proposed design and massing agreed in principle with senior officers and the GLA.
- Representations were received from landowner at Regulation 19 referring to the pending planning application under reference 240012FUL.
- A hearing statement in response to Matter 9 was received from the landowners requesting the proposed allocation be updated to take into account planning permission 240012FUL which was granted planning consent on 5 November 2024, and correction of the site address.
- The site is being actively promoted by Luxgrove in 'Ealing Metropolitan Centre Investment Prospectus 2025'.
- A further suggested change to the schedule has been requested for the following relevant planning applications:
- 240012FUL for 99 – 113 Broadway, West Ealing. Granted planning permission on 5 November 2024 for demolition of existing buildings and mixed-use development comprising flexible commercial floorspace (ground and mezzanine), 144 new homes on upper floors

- 251020PACBSD for 105 – 113 Broadway, West Ealing. Change of use from retail and offices on first and second floors to 18 self-contained residential units (Prior Approval). Prior approval was required and was granted 15 May 2025.
- 252344FUL for 105 – 113 Broadway, West Ealing, pending consideration. Construction of third floor to create an additional eight self-contained residential units; single storey infill extension to ground floor and infill extension to second floor to create additional self-contained flat.
- The site is included in the Brownfield Register.
- The indicative timetable for delivery of this site is 0 -5 years.
- The site meets the NPPF definition of developable land as it is in a suitable location, is available and is viable for a residential led mixed-use scheme within the plan period.
- The site is therefore appropriate for allocation in the emerging Ealing Local Plan and contributes to meeting strategic, regeneration and placemaking objectives.

05GR Former Greenwich School of Management

SSR 2024 {EB103} provides a deliverability assessment **summary** for the site that says:

The site scores well across the deliverability criteria. The site is in single ownership and although not yet under an option to a developer, the owners have indicated their support for their site to come forward for development, likely to be within 6 - 15 years.

Deliverability Assessment: Availability		
Criteria	Score	
Ownership		Site is in single ownership.
Existing use(s)		Site is in active use but could be reprovided as part of development.
On-site restrictions		Site is not subject to any known restrictions.
Planning status		Known developer interest in bringing the site forward
Availability within plan period and readiness of site for development		Site is expected to be available in 0 - 5 years.

Deliverability Assessment: Achievability		
Criteria	Score	
Site marketability		Site is being actively marketed for development or enquiries have been received from a developer.
Viability considerations		Potential viability constraints based on professional knowledge and engagement with developers; or Viability constraints unknown through lack of evidence.

Further information:

- The emerging site allocation comprises a small part (2.51ha) of the much larger allocated Former GSK site (19.7ha), the redevelopment of which has largely been completed.

- Representations at Regulation 18 and Regulation 19 from the site owners, Brydell Partners confirmed their support for the allocation of the site.
- Brydell Partners also submitted a hearing statement in response to Matter 9 stating their continued support for current and future development of the site.
- The indicative timetable for delivery of this site is 6 – 15 years.
- The site meets the NPPF definition of developable land as it is in a suitable location, is available and is viable for an employment-led mixed-use scheme within the plan period.
- The site is therefore appropriate for allocation in the emerging Ealing Local Plan and contributes to meeting strategic, regeneration and placemaking objectives.

02HA Gray's Garage

SSR 2024 {EB103} provides a deliverability assessment **summary** for the site that says:

The site scores just above average across the deliverability criteria. The majority of the site is within single ownership, and it is expected that the landowners will work together to bring forward a comprehensive scheme. The site is expected to come forward in 6 - 10 years.

Deliverability Assessment: Availability		
Criteria	Score	
Ownership		Site is in multiple ownership where landowners are promoting independent schemes that are not in conflict, or working collaboratively on a scheme, and there is an agreement in place between parties; or Site is known to be in multiple ownership but no known evidence of conflicting schemes.
Existing use(s)		Site is in active use but could be reprovided as part of development.
On-site restrictions		Site is not subject to any known restrictions.
Planning status		Imminent, live or granted planning application; or Existing preapplication advice identifying a clear vision for whole or part of the site; or Expired consent; or No relevant planning history.
Availability within plan period and readiness of site for development		Site is expected to be available in 6 - 15 years.

Deliverability Assessment: Achievability		
Criteria	Score	
Site marketability		Site is being actively marketed for development or enquiries have been received from a developer.
Viability considerations		Potential viability constraints based on professional knowledge and engagement with developers; or Viability constraints unknown through lack of evidence.

Further information:

- The emerging site's boundary differs from the currently allocated site, comprising a smaller part of a larger site that has been redeveloped.
- The site has been subject to informal pre application discussions, including with Ealing's housing department have taken place.
- The site is included in the Brownfield Register.
- The indicative timetable for delivery of this site is 6 – 10 years.
- The site meets the NPPF definition of developable land as it is in a suitable location, is available and is viable for a residential-led mixed-use scheme within the plan period.
- The site is therefore appropriate for allocation in the emerging Ealing Local Plan and contributes to meeting strategic, regeneration and placemaking objectives.

01SO Southall Crossrail Station and Gurdwara

SSR 2024 {EB103} provides a deliverability assessment **summary** for the site that says:

The site scores variably across the deliverability criteria. This key strategic site is part owned by Network Rail, and with known interest in developing the site from the existing private landowner. The existing Gurdwara will need to be reprovided. Ensuring site optimisation and creating a suitable mix of uses appropriate to this gateway location will pose opportunities and challenges. Development is expected to come forward between 6 - 15 years.

Deliverability Assessment: Availability		
Criteria	Score	
Ownership		Site is in multiple ownership where landowners are promoting independent schemes that are not in conflict, or working collaboratively on a scheme, and there is an agreement in place between parties; or Site is known to be in multiple ownership but no known evidence of conflicting schemes.
Existing use(s)		Site is in active use but could be reprovided as part of development.
On-site restrictions		On-site constraints have been identified but mitigation or design solutions mean that any impact can likely be managed or mitigated.
Planning status		Known developer interest in bringing the site forward.
Availability within plan period and readiness of site for development		Site is expected to be available in 6 - 15 years.

Deliverability Assessment: Achievability		
Criteria	Score	
Site marketability		Site is not being actively marketed.
Viability considerations		Potential viability constraints based on professional knowledge and engagement with developers; or Viability constraints unknown through lack of evidence.

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Further information:

- The emerging site's boundary differs from the currently allocated site, which is a much larger site (4.79ha), SOU4 Southall Crossrail Station comprising the emerging site and industrial land abutting the northern edge of the Elizabeth Line and Great Western Railway line. The allocated site was split up partly because of the planning consent on 02SO Southall Sidings and it was considered that a smaller site would be more likely to come forward for development, in line with the NPPF noting that the sub-division of larger sites can speed up the delivery of homes. The site located in between Southall Crossrail Station and Gurdwara and Southall Sidings was proposed for allocation at Regulation 18 - SO02 Park Avenue. This site is owned by the council and following Regulation 18 consultation, works were about to commence and it was decided there was no longer a need to allocate the site.
- Informal pre application advice has taken place for this key regeneration site that is broadly aligned with the council's aspirations for provision of a new faith building, community and learning space related to faith and residential development to enable the development.
- A representation at Regulation 18 on behalf of the Gurdwara was received, but no further representations were received at Regulation 19.
- The site is included in the Brownfield Register.
- The indicative timetable for delivery of this site is 6 – 15 years.
- The site meets the NPPF definition of developable land as it is in a suitable location, is available and is viable for a residential-led mixed-use scheme and reprovision of the Gurdwara within the plan period.
- The site is therefore appropriate for allocation in the emerging Ealing Local Plan and contributes to meeting strategic, regeneration and placemaking objectives.

03S0 Former Sorting Office & Kings Hall Methodist Church

SSR 2024 Appendix E: results {EB104} provides a deliverability assessment **summary** for the site that says:

The site scores variably across the deliverability criteria. This strategic site is not being currently marketed actively, however there is landowner interest in bringing the site forward. Reprovision of community/church use and a locally listed building might add to viability considerations. The site is expected to come forward in the first 10 years of the Plan.

Deliverability Assessment: Availability		
Criteria	Score	
Ownership		Site is in multiple ownership where landowners are promoting independent schemes that are not in conflict, or working collaboratively on a scheme, and there is an agreement in place between the parties.
Existing use(s)		Site is in active use but could be reprovided as part of development.
On-site restrictions		There are no known on- site constraints which would impact upon deliverability.
Planning status		Imminent, live or granted planning application; or Existing reapplication advice identifying a clear vision for whole or part of the site; or Expired consent; or No relevant planning history.
Availability within plan period and readiness of site for development		Site is expected to be available within 0-5 years.

Deliverability Assessment: Achievability		
Criteria	Score	
Site marketability		Site is not being actively marketed
Viability considerations		Potential viability constraints based on professional knowledge and engagement with developers; or Viability constraints unknown through lack of evidence.

Further information:

- The emerging site's boundary differs from the currently allocated site SOU3 Beaconsfield Road, South Road, which is a larger site covering 3.23ha. The current site allocation included Hambrough Primary School to the north and Southall West London College to the west. The school was removed from the emerging site allocation as there is no prospect of it being redeveloped during the timeframe of this local plan. Part of Southall West London College has already been redeveloped with housing, and the remainder of the site is proposed as a separate site allocation 04SO Southall West London College. It was considered that the proposed smaller site (0.54ha) would be more likely to come forward for development, in line with the NPPF noting that the sub-division of larger sites can speed up the delivery of homes.
- The Former Sorting Office has an extant planning permission, PP/2015/4921 and 22263VAR for a residential led mixed use scheme that is almost completed.
- Kings Hall Methodist Church has been subject to informal pre application advice, and a property consultancy has recently been appointed.
- No objections to the site's inclusion as an allocation were received from the landowner during either the Regulation 18 or Regulation 19 consultations
- The site is included in the Brownfield Register.
- The indicative timetable for delivery of this site is 0 - 10 years.
- The site meets the NPPF definition of developable land as it is in a suitable location, is available and is viable for residential-led, community and mixed-use redevelopment within the plan period.
- The site is therefore appropriate for allocation in the emerging Ealing Local Plan and contributes to meeting strategic, regeneration and placemaking objectives.

05SO 31 – 45 South Road & Tel. Exchange, Quality Foods & Iceland

SSR 2024 {EB103} provides a deliverability assessment **summary** for the site that says:

The site scores variably across the deliverability criteria. Multiple ownership might be an issue for deliverability, however there was positive feedback from the Reg 18 consultation from the majority of landowners. This strategic site is not currently being marketed actively. It is anticipated that the site will come forward for development between 6 - 15 years.

Deliverability Assessment: Availability		
Criteria	Score	
Safeguard alternative uses		Not within a consultation zone for safeguarded alternative uses.
Ownership		Site ownership is unknown or is in multiple ownership and the other owners are either unknown, oppose the development or are promoting another conflicting scheme.
Existing use(s)		Site is in active use but could be reprovided as part of development.
On-site restrictions		Site is not subject to any known restrictions.
Planning status		Imminent, live or granted planning application; or Existing preapplication advice identifying a clear vision for whole or part of the site; or Expired consent; or No relevant planning history
Availability within plan period and readiness of site for development		Site is expected to be available in 6 - 15 years.

Deliverability Assessment: Achievability		
Criteria	Score	
Site marketability		Site is not being actively marketed.
Viability considerations		Potential viability constraints based on professional knowledge and engagement with developers; or Viability constraints unknown through lack of evidence.

Further information:

- The emerging site's boundary differs from the currently allocated site SOU3 Beaconsfield Road, South. The emerging site boundary change comprises the removal of 63 to 95 South Road, the addition of the Telephone Exchange and 31 – 45 South Road, and the retention of Iceland and Quality Foods, proving a different focus and configuration for this part of Southall.
- The site has been subject to informal pre application advice.
- Regulation 18 representation was received from two of the owners of the wider proposed allocation supporting redevelopment – 31 – 43 South Road (about half the site) and Part 15-17 Oxford Walk: Southall Properties Limited and Southall Investments Limited. They support the principle of the proposed uses and support the allocation. They noted that due to long leases and multiple ownerships, the Regulation 18 site allocation indicative timeframe was not achievable. The site allocation timeframe was amended to 6 – 15 years for Regulation 19.
- Further representation from the two owners was received at Regulation 19 reiterating support for the proposed site allocation.
- Iceland, Quality Foods and associated car park are included in the Brownfield Register
- The indicative timetable for delivery of this site is 6 – 15 years.
- The site meets the NPPF definition of developable land as it is in a suitable location, is available and is viable for a residential-led mixed-use scheme within the plan period.
- The site is therefore appropriate for allocation in the emerging Ealing Local Plan and contributes to meeting strategic, regeneration and placemaking objectives.

07SO The Limes, Maypole Court, Banq. Centre, 13 – 19 The Green

SSR 2024 {EB103} provides a deliverability assessment **summary** for the site that says:

The site scores mostly averagely across the site. There is an extant permission on part of the site, which is in multiple ownership. As a key strategic site, a cohesive scheme would be preferable and might help with viability considerations. Community uses should be reprovided. It is expected that development will come forward in 6 - 10 years.

Deliverability Assessment: Availability		
Criteria	Score	
Safeguard alternative uses		Not within a consultation zone for safeguarded alternative uses.
Ownership		Site is in multiple ownership where landowners are promoting independent schemes that are not in conflict, or working collaboratively on a scheme, and there is an agreement in place between parties; or Site is known to be in multiple ownership but no known evidence of conflicting schemes.
Existing use(s)		Site is in active use but could be reprovided as part of development.
On-site restrictions		Site is not subject to any known restrictions.
Planning status		Imminent, live or granted planning application; or Existing preapplication advice identifying a clear vision for whole or part of the site; or Expired consent; or No relevant planning history
Availability within plan period and readiness of site for development		Site is expected to be available in 6 - 15 years.

Deliverability Assessment: Achievability		
Criteria	Score	
Site marketability		Site is being actively marketed for development or enquiries have been received from a developer.
Viability considerations		Potential viability constraints based on professional knowledge and engagement with developers; or Viability constraints unknown through lack of evidence.

Further information:

- The emerging site's boundary differs from the currently allocated site SOU6 Southall East, which is a much larger site measuring 9.21ha. The emerging site (1.22ha) includes The Limes, which forms part of the allocated site, and the addition of Maypole Court, Banqueting Centre and 13 – 19 The Green. Development of the Arches Business Centre in the north west of the current allocation has or will be soon completed. The Middlesex Business Centre, which forms part of the current allocation is an emerging site allocation, 08SO. It was considered that a smaller site would be more likely to come forward for development, in line with the NPPF noting that the sub-division of larger sites can speed up the delivery of homes.
- Relevant planning applications: 216215FUL for 13 – 15 The Green to provide 95 residential units was granted permission in February 2024; 223246FUL for the Banqueting Centre (Southall Community Centre) for a mixed-use development comprising community/commercial uses and 215 flats, currently pending consideration.
- Representation at Regulation 18 was received on behalf of Dominus, developer of 13 – 15 The Green supporting inclusion of their site as part of the proposed site allocation.
- Representations at Regulation 18 and Regulation 19 was received on behalf of the owner of Southall Community Centre (Diamond Property London Ltd) confirming that they had no objection of the inclusion of their site as part of the proposed site allocation and noting the current planning application (pending consideration).
- The Limes and Maypole Court have been jointly earmarked to deliver a replacement health centre of circa 2,500sqm and 200 flats, 50% of which would be affordable, subject to viability.
- The Limes part of the emerging site is included in the Brownfield Register.
- The indicative timetable for delivery of this site is 6 – 15 years.

- The proposed site allocation meets the NPPF definition of developable land as it is in a suitable location, is available and is viable for a mixed-use scheme within the plan period.
- The site is therefore appropriate for allocation in the emerging Ealing Local Plan and contributes to meeting strategic, regeneration and placemaking objectives.

{END}

