

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

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Your ref

My ref
CR/035

Extension
8056

Date
13th March 2026

Dear Sir/Madam,

**Examination of the Ealing Local Plan 2024-2039:
Ealing LPA's Response to Post Hearing Action Logs,
Block 2, Part 7 - Dealing with items 4.20, 4.25, 9.1, 9.3, 9.33,
10.1 and 10.2.**

I wrote to you setting out a record of the agreed log of actions on 24th December 2024 that arose from the hearing sessions that dealt with Block 2, Matters 4 and 6-10 between 2 - 11 December 2025. This letter provides the seventh batch of council responses relating to the Action Log items mentioned above.

Matter 4 – Housing

Action Log 4.20 - Policy H16 -To provide a note on the viability assessment of LSPBSL and whether the approach taken and methodology is sound.

LPA Response: EB120 tests the viability of large-scale purpose-built shared living through typology 20, which is a 200-unit co-living scheme. This incorporates the London Plan requirement for a payment in lieu of 35% of units assumed to be let at a discount to market rent of 50%. Co-living developments typically generate high capital values that exceed standard residential values due to their high density in comparison to standard flatted developments. Rents for co-living units are typically in the region of £400 per week and after allowing for an operating cost and void allowance of 30%, the net rent per week is £280 per week. The main agents (Knight Frank and CBRE) are currently advising that investment yields for co-living developments are in the region of 4.75% to 5%, so taking the slightly more cautious 5% results in a capital value of circa £1,350 per square foot. This is significantly higher than the top end of values achieved in Ealing for C3 residential (i.e. £1,000 per square metre. Consequently, co-living developments are typically more viable than C3 residential developments.

Action Log 4.25 - Policy SSC/Para 5.26 - To consider some additional supporting text in Para 5.26 that makes reference to the approach to viability testing in decision making.

LPA Response: Para 6.21 of EB120 provides an approach that could be applied to Policy SSC. This could be adapted to be incorporated into the Plan as a suggested modification below.

Add a new paragraph in supporting text after Para 5.26 as follows:

"The council considers that setting reduced targets of 10% and 20% affordable housing equivalent for smaller schemes should significantly reduce the need for viability testing small sites contributions at the DM stage. However, if applicants consider that the financial contribution would render the scheme unviable, the council will apply a flexible approach to calculation of the contribution. If it is established to the council's satisfaction that a development proposal could not viably provide 10% or 20% of units on site as affordable, the (lower) agreed affordable housing percentage would be used when calculating the formula above. For example, the payment in lieu for a 5-unit development would require 0.5 units (10%) to be provided as affordable housing to meet the policy target. If it is agreed that a scheme can only viably provide 5% affordable housing, then the financial equivalent would be based instead on 0.25 units."

Matter 9: Development Sites

Action Log 9.1 - To conduct a review as to whether any Development Sites should now be removed as implementation of any planning consent now renders such an allocation no longer necessary e.g. Smiths Farm, 06GR.

LPA Response: Officers have undertaken a review of all proposed Development Sites to determine whether any should be removed on the basis that implementation of an existing planning consent renders the allocation unnecessary.

Following this review, officers consider that only one proposed site, 15SO Monorep Site, should be deleted. A part-retrospective planning application (ref. 241738FUL) for the change of use from an existing car showroom and MOT garage to a Place of Worship (Class F1) was granted permission in April 2025. This change of use effectively removes any realistic prospect of delivering the site's proposed allocation (a residential-led mixed-use scheme), and any comprehensive redevelopment within the plan period is now considered to be highly unlikely.

Therefore, the council propose the following suggested modifications:

“Amend Table S2 Southall Development Sites to delete reference to 15SO (Monorep Site) and renumber allocations 16SO to 21SO accordingly.”

and:

“Delete site allocation 15SO (Monorep Site) on pages 438-439 in its entirety and renumber allocations 16SO to 21SO accordingly.”

No other proposed Development Sites with planning permissions have been implemented to a degree that would justify their removal at this stage. While some sites have commenced works, officers consider it premature to delete allocations where permissions are only partly implemented or may be subject to change. Factors such as developer turnover, amended schemes, or revised delivery strategies can affect build-out timescales, as illustrated in the case of 06GR Smiths Farm. For these reasons, officers advise retaining the remaining allocations.

Action 9.3: To consider how best to include indicative housing capacities for each Development Site.

LPA response: The council proposes that ‘gross indicative housing capacities’ be included in the information for each proposed Development Site between “Proposed Use” and “Relevant Planning Application(s)”.

The following suggested modification is proposed to provide an explanation of the gross indicative housing capacities will be added to the overarching principles that precedes each town’s development sites list:

For each of the seven preambles to the Town Plan Development Sites (e.g. Acton development Sites, Ealing Development Sites, etc) add a new paragraph under 4.1.61, 4.2.56, 4.3.77, 4.4.51, 4.5.57, 4.6.44 and 4.7.648 after “Key Infrastructure Requirements” as follows:

“Indicative Capacities:

Development proposals must be brought forward through a design led process in accordance with the London Plan and Ealing LPA’s Local Plan. The indicative gross housing capacities set out here do not seek to prescribe outcomes for any of the sites. Instead, they provide a broad estimate of the gross housing capacity of the allocated sites having regard to the policies in the Ealing LPA Local Plan and what could come forward on the site for the purpose of calculating development capacity. Any subsequent planning applications on the sites within this document will be assessed on their individual merits.”

The table below shows the proposed 'gross indicative housing capacities' that should be included as a suggested modification for each individual Development site.

Please note that 15SO Monorep Site has not been included as it has been suggested that this site be removed as an allocation (see response to Action 9.1).

Gross Indicative Capacities for Ealing Local Plan Site Allocations:

Reg 19 Site Reference	Site Name	Gross Indicative Capacity
01AC	Acton Gateway (Morrisons)	377
02AC	Acton Gardens	2000
03AC	Ealing Common Depot	225
04AC	Builders Merchants Bollo Bridge Road	40
05AC	Salisbury Street Car Park & Neville Close	109
06AC	Acton Vale Industrial Park & Westgate House	26
07AC	Dean Court	419
08AC	Oaktree Court	41
01EA	Broadway Connection & Arcadia	84
02EA	Ealing Broadway Shopping Centre & Crystal House	443
03EA	Sandringham Mews	220
04EA	Eastern Gateway	9
05EA	Perceval House	188
06EA	49 - 69 Uxbridge Road	129
07EA	CP House	0
08EA	Craven House	0
09EA	66 - 86 Broadway, West Ealing	94
10EA	59 - 65 Broadway, West Ealing (Lidl)	25
11EA	Sainsbury's & Library, West Ealing	222
12EA	Chignell Place, West Ealing	21
13EA	99 - 113 Broadway, West Ealing	144
14EA	Western Gateway	74
15EA	Waitrose, West Ealing	229
16EA	West Ealing Station Approach	123
17EA	Castle House	172
18EA	Access House & T Mohan, West Ealing	79
19EA	Gurnell Leisure Centre	295
20EA	Downhurst Residential Care Home	15
21EA	Former Barclays Sports Ground	97
22EA	96 Queens Drive & Telephone Service Centre and 33 Hanger Lane	142
23EA	Old Actonians Sports Ground	20
24EA	Wickes, South Ealing Road	162
25EA	Travis Perkins, Popes Lane	87
01GR	Greenford Hall, Methodist Church, Police Station & Clinic	6

Reg 19 Site Reference	Site Name	Gross Indicative Capacity
02GR	Greenford Broadway Car Park, 2 – 4 Oldfield Lane South, 177 & 177A Greenford Road	176
03GR	370 - 388 Oldfield Lane North	39
04GR	Westway Cross	1728
05GR	Former Greenwich School of Management	272
06GR	Smith's Farm	220
01HA	Ealing Hospital	383
02HA	Gray's Garage	23
03HA	George Street Car Park	16
04HA	Lidl and discount store	59
05HA	Marshall Site, Gold's Gym & Garages on Montague Avenue	100
06HA	Tile Depot & Lambourn Close	128
07HA	Copley Close Estate	700
08HA	High Lane Housing Estate	505
01NO	Car Sales Site	190
02NO	Mandeville Parkway	106
03NO	Northolt Sorting Office	44
04NO	Northolt Driving Range	212
05NO	Medlar Farm Estate	235
06NO	Yeading Lane I	262
07NO	Yeading Lane II	204
08NO	Grange Court	147
09NO	Kingdom Workshop	0
10NO	Airways Estate	498
01PE	BP Garage	98
02PE	Land on the South Side of Western Avenue	48
03PE	Alperton Lane North	47
04PE	Alperton Lane South and Metroline Depot	190
01SO	Southall Crossrail Station and Gurdwara	505
02SO	Southall Sidings	460
03SO	Former Sorting Office & Kings Hall Methodist Church	88
04SO	Southall West London College	103
05SO	31 - 45 South Road & Telephone Exchange, Quality Foods & Iceland	148
06SO	Fairlawn Hall & Science of the Soul Centre	186
07SO	The Limes, Maypole Court, Banqueting Centre, 13 - 19 The Green	361
08SO	Middlesex Business Centre	1274
09SO	Havelock Estate	635
10SO	The Green	231
11SO	The Green Quarter (Southall Gasworks)	3776
12SO	Scotts Road Trading Estate	92

Reg 19 Site Reference	Site Name	Gross Indicative Capacity
13SO	Endsleigh Industrial Estate	59
14SO	Witley Works	55
16SO	Warren Farm & Imperial College Land	0
17SO	Great Western Triangle Centre	64
18SO	Golf Links Estate	430
19SO	Cranleigh Gardens Industrial Estate & Kingsbridge Crescent	216
20SO	Hambrough Tavern	116
21SO	Toplocks Estate	614

Action Log 9.33 - 01GR Greenford Hall, Methodist Church, etc - To consider amending the 6th design principle to determine whether or not reference to enabling development is appropriate or not. (This considerations should extend to other site allocations where enabling development is cited).

LPA Response: Following a review of the 6th design principle, the council believe that the reference to 'enabling residential development' is not appropriate for the objectives of this site allocation, which envisages a relatively small amount of residential development. The following suggested modification is therefore proposed:

Amend the 6th design principle of site allocation 01GR as follows:

"Ensure that any mixed-use development proposals for Greenford Hall maximise the building's use and its public offering by providing better quality, flexible spaces for a wide range of public users and community groups alongside some enabling **ancillary** residential accommodation."

No further changes are proposed for any other site allocations where enabling development is cited.

Matter 10: Delivery and Monitoring

Action Log 10.1 - Policy ENA, Para 5.65 - To consider revised wording for Para 5.65, in particular whether the reference to "important plan objectives" is justified.

LPA Response: The council proposes the following suggested modification:

Amend Para 5.65 as follows:

"Enabling development is **any** development that would otherwise conflict with **important a plan** policy objectives such as the

designation of a given site, but which is permitted where it is necessary in order to enable benefits to secure that the long-term delivery of that objective ~~or designation what and where the benefits to the objective~~ outweigh the material planning harm arising from that departure."

Action Log 10.2 - Policy ENA, New Supporting Text before Para 5.65 - To consider revised wording for suggested modification FSMM50 to include reference to the NPPF as well as the relevant guidance.

LPA Response: The council proposes the following suggested modification:

Insert a new paragraph before Para 5.65 as follows:

"This policy applies wherever national guidance on enabling development is lacking. Enabling development for heritage assets will continue to be assessed according to Historic England guidance and the NPPF."

Please let me know if you require any further information or clarification on these matters.

Yours sincerely

Steve Barton

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