

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

Ealing Council
Perceval House
14-16 Uxbridge Road
London W5 2HL

Tel 020 8825 8056

Your ref	My ref	Extension	Date
	CR/038	8056	19th 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 10 - Dealing with items 9.20, 9.22, 9.27, 9.35, 9.36
and 9.39.**

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 tenth batch of council responses relating to the Action Log items mentioned above and is the second batch sent today.

Matter 9: Development Sites

Action Log 9.20 - 09SO Havelock Estate - To consider the implications of FSMM24 relating to the new contextual consideration arising from the SoCG between Ealing and CRT for potential housing capacity for the site.

LPA Response: The proposed changes to this allocation text arising from the preparation of the SoCG between Ealing and the CRT are not considered to alter the capacity estimates assumed for this site informing the council's Housing Trajectory.

It should be noted that the capacity estimate for this allocation reflects that already approved under planning. Outline planning permission (PP/2013/3241) was approved in 2015 for the wider Havelock Estate. Detailed permission was concurrently approved for phase 1 (PP/2013/3242), which has been subject to various amendments. Phase 1 was completed in 2020. Phases 2 to 4 remain approved in outline only at this stage and comprises 635 units replacing 536 units. The net uplift at 99 units is modest, which is relevant when considering the scale of development assumed relative to the established estate. Whilst it is anticipated that a revised scheme will be submitted for phases 2-4 further details are not available regarding this at present.

Although the outline scheme was prepared and assessed long before the current allocation was written and revised, the principles captured in the recommended modification (FSMM24) broadly align with the design approach being presented at the time, specifically with regard to the locational focus of taller elements etc. As noted already the permitted scheme involved a relatively modest uplift, and the design principles articulated now, possibly may facilitate a further uplift. It is unlikely that the further modifications would have the opposite effect of moderating down the capacity permitted currently. It is also understood that the CRT were engaged in the preparation of this application, although again it is acknowledged that this occurred some time ago.

Accordingly, the capacity contribution from this site reflects that approved already, and we do not consider that the proposed further modification would have the effect of moderating down the capacity assumption for this site already plugged into the trajectory.

Action Log 9.22 - 10SO The Green - To provide a note on updating the current and future status of development proposals and any implications of any change in circumstances for assumptions in the Plan and for the housing trajectory.

LPA Response: The council own Featherstone Terrace Car Park which represents a sizable portion of the site. To acquire land not in Council ownership the council had initiated using CPO powers which were approved in April 2023.

The council selected Peabody as a development partner in 2019 to fund and bring forward the development of the site (covering the cost of land assembly also).

Planning permission (215058FULR3) was given in September 2022 for a mixed-use scheme at this site comprising 564 units. As approved the scheme was to be built over 3 phases reflecting the format of the development arranged over 3 blocks, and this detail had informed how this capacity was captured in the earlier iteration of the trajectory (version 2).

In July 2025, the council received a detailed statement of non-viability from Peabody outlining the reasons and evidence that deemed the planning consent as unviable development and advising that implementation could not now proceed. Officers have worked collaboratively with Peabody to explore all options to restore financial viability, but no options are currently workable in the confines of this partnership. The council have also discounted the option of procuring an alternative development partner to implement this approved scheme. Accordingly, in November 2025 the Council announced that the Development Agreement had been terminated, and that both the CPO and planning permission will not now be pursued. The CPO will formally expire in May 2026.

Although the CPO will expire shortly, the council does retain the freehold of Featherstone Terrace car park and has an option to retain the Medina Dairy Factory site, which the council acquired by agreement (funded by Peabody). In line with the Southall OAPF and Local Plan policies, the redevelopment of the car park remains a priority for the council. Officers have initiated informal discussions with landowners within the Featherstone Estate, which is a Locally Significant Industrial Site (LSIS) to explore land assembly and partnership opportunities. Any future regeneration strategy in this part of the borough will be framed by a local stakeholder and community-led approach with land assembled through productive partnerships and acquisitions by agreement. A new CPO is not however expected to form part of this strategy going forward.

In light of the above, the latest update to the trajectory (version 3) now assumes a zero-capacity contribution from planning permission 215058FULR3. Whilst an alternative strategy for the wider site has not yet been determined, and with various unknowns it is too soon to calculate a contribution from the wider allocation site and determine phasing, greater confidence / certainty exists regarding the potential contribution arising from the Featherstone Car Park part of the site. Accordingly, a capacity contribution from this part of the allocation has been captured against the allocation effectively representing a partial input, which ultimately will be revised / superseded in a future update of the trajectory to account for the anticipated contribution from the wider site once determined. An interim figure of 231 units has been inputted against the allocation, which has been informed by the Tall Building Study which provides separate indicative figures for each component of the site including the car park (referenced as block B). Given that this capacity is not currently associated with a specific application or permission, a cautious approach has been taken to phasing this input, and accordingly this capacity has been assigned to the later half of the trajectory period (years 8–11).

Action Log 9.27 - 16SO Warren Farm and Imperial College Land - To consider whether a modification is needed for clarity to provide an update on the location of the new sport facility.

LPA Response: Since the publication of the Local Plan in February 2024, the council has sought to make further progress towards realising its ambitions of rewilding this site whilst accommodating outdoor sports facilities to meet the demand for access to sports facilities identified in the council's indoor and outdoor sports facilities strategy. Whilst the original allocation text (fixed in February 2024) is consistent with these plans, it is recognised that additional information now exists around how the council intends to realise these plans.

Specifically, the council has outlined its plans and provided updates on progress via Cabinet Reports in March 2024 and July 2025. These detail

the intention of the council to retain and enhance the existing green area to the south and east of the site for wildlife. They also indicated that the council planned to apply to Natural England to designate this part of the site as a Local Nature Reserve, which was approved very recently in March 2026. That part of the site to the north and west which already encompasses some buildings and PDL, and includes land currently owned by Imperial College is expected to accommodate the newly provided sport facilities (encompassing outdoor pitches and ancillary built facilities). To achieve this the council intends to lease land from Imperial College. The terms of such an agreement have been agreed in principle, but vacant possession cannot be granted before the end of February 2026.

As drafted the design principles advise that the siting, scale and distribution of built form should be designed to preserve the openness of the site and to protect ecological value. It goes on to advise that clustering built form around previous areas of hard standing may be preferred. Whilst all of these principles stand it is recognised that there may be value in providing more locational detail, under the 'contextual considerations' regarding the siting of uses across the site, reflecting the council's latest thinking.

To this end the council proposes the following suggested modifications for site allocation 16SO:

At the end of the second bullet point under 'Contextual Considerations' as follows:

"... species are present. ~~Given this status the council are currently pursuing a Local Nature Reserve status for an extensive part of the site, which will complement the existing SINC designation.~~ Reflecting this value an extensive part of the allocation to the south and east is now designated as a Local Nature Reserve, which compliments the SINC designation."

Amend the fifth bullet point under 'Contextual Considerations' as follows:

"Future provision of outdoor facilities will need to take into consideration the current site sensitivities as well as the need to protect green space. The council are seeking to refocus the outdoor sports offer around the north and west of the site on land currently owned by Imperial College and freeing up the remaining site to the south and east to be managed for nature."

Action Log 9.35 - 02GR Greenford Broadway Car Park - To provide a note on the implications for housing capacity/trajectory in the eventuality that the amendment to the red line boundary to include Tesco was not taken forward.

LPA Response: The previous published iteration of the housing trajectory (version 2 – February 2025) identified a net capacity of 154 units from this site (comprising 156 gross gains and 2 gross losses).

The anticipated net capacity for this site derives from the Tall Building Study Appendix Part 2 (EB45B), with adjustments made to account for the loss of existing units. The capacity input is based off the 'alternative option' presented in this study for GR02, incorporating Tesco and the bank.

The initial scenario examined as part of this study excluded Tesco and the bank. The capacity estimate for this smaller site is 122 units and is detailed in EB45B – Page 51). In the event that Tesco's land holding was excluded from the final allocation boundary, the council would revert to using the capacity estimate for the initial scenario (i.e. 122 gross unit) when updating the housing trajectory. The recent updated iteration of the trajectory (version 3 March 2026) continues to reflect a scenario based on the full site incorporating Tesco.

Action Log 9.36 - 03GR 370-388 Oldfield Lane North - To consider requirement for an amendment to the flood zone in the "Planning designations/site constraints" from Zone Level 3a to Level 1 and/or the design principles. (NB: clarify with SFRA consultants as there is an inconsistency in mapping).

LPA Response: Under 'Planning Designations/Site Constraints' the site is currently recorded as falling within flood zone 3 (surface water). This reflects the West London SFRA policy map which shows that a small section within the eastern half of the allocation area falls within flood zone 3a (surface). The extent of this overlap is small relative to the full site allocation area, and the area at risk is situated to one side of the allocation area. There is sufficient space within the site to design the layout to avoid the need to locate the most vulnerable aspects of the development within flood zone 3a. The existence of this constraint does not compromise the deliverability of this allocation currently or impinge on the calculated capacity assumptions. The text as written under 'Planning Designations / Site Constraints' remains correct and does not require amending.

In revisiting the evidence underpinning this constraint for this specific site, it is recognised however that the SFRA and associated flood zones function as live outputs, and applicants and decision makers should ensure that they are having regard to the latest published documents which are updated from time to time to reflect revised modelling and changes in national policy including definitions.

Since this may be relevant to multiple sites, it is recommended that within the introductory text for the Development Sites for each Town Plan in Chapter 4 that the standard text addressing 'Flood Risk' is updated as follows:

"Flood Risk: Development proposals must comply with the latest technical guidance provided by the council, including the Strategic Flood Risk Assessment (SFRA) Level 1 and 2. The identification or non-identification of flood risk under the site constraints section of each allocation reflects the evidence existing at the time of publication of this Local Plan. The SFRA represents a live document and during the life of this plan the SFRA may be updated from time to time to reflect updated modelling and changes to national policy, which may alter the geographical extent of flood risk. Applicants and decision makers should therefore always check the latest published outputs when establishing risk from flooding."

Action Log 9.39 - 05GR Fmr Greenwich School of Management - To consider:

- (i) an amendment to the to the indicative timetable for delivery to align with the housing trajectory. (NB: should be 8-12 years, not 6-15 years).***
- (ii) whether a design principle needs to be included to cover how TPOs across the site should be treated.***

LPA Response:

(i) The allocation text includes details of the anticipated programme of delivery ('Indicative timeframe for delivery') for each site allocation. To aid interpretation this is organised around three five-year intervals: 1–5, 6–10 and 11–15 years, and combinations of these, for example 6–15 years, where appropriate.

The housing trajectory assigns 272 units to years 8, 9, 10, 11 & 12 for this site allocation, which is organised at a more granular level than the phasing assumptions in the site allocation where delivery is assigned to years 6–15. Based on the housing trajectory assignment/convention, years 8–12 fit correctly into the site allocation's indicative timeframe of 6–15 years. There is no inconsistency, just a difference in how the information is presented, and therefore the council is of the opinion that no modification is required.

(ii) The allocation site is covered by a TPO relating to this site and land to the south. The tree cover is fairly extensive across the site but particularly along the eastern edge, and the presence of a TPO is indicative of their value. The presence of these trees and their significance should shape the form of development which is brought

forward on this site. To recognise this, it is proposed that a suggested modification is proposed as follows:
Add a new bullet point after the existing 6th bullet point under 'Design Principles' as follows:

"Development should result in an increase in green cover through the inclusion of urban greening measures and the retention of existing features of significance, noting the extensive tree cover present on part of the site currently."

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

Yours sincerely

Steve Barton

Steve Barton,
Strategic Planning Manager

Tel 020 8825 8056
Email bartons@ealing.gov.uk