

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/040	8056	24th 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 12 - Dealing with items 4.18, 10.4, 10.5, 10.6,
10.7, 10.8 and 10.9.**

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 twelfth batch of council responses relating to the Action Log items mentioned above.

Matter 4 – Housing

Action Log 4.18 - SP 4.3 A - To provide a note on the current housing delivery pipeline for sites 08SO (Middx Business Centre), 10SO (The Green) and the Quayside Quarter, Southall.

LPA Response: The above-mentioned sites / scheme are addressed individually below. A note is also provided in respect of allocation site 11SO – The Green Quarter, as this site was also discussed in the context of this action during the hearing session and we believe has been unintentionally omitted from the question.

08SO – Middlesex Business Centre

The majority of the allocation site benefits from a live planning permission. Outline planning permission (ref. 183673OUT) was given in November 2019 for the redevelopment of the site involving the creation of up to 2,083 residential units, alongside a hotel, retail, office and community provision. Prior to this approval there were no existing residential units existing on the site, and the approved total of 2,083 represents both the net and gross figure. This outline permission encompasses much of the allocation site but excludes Unit K to the south east corner of the site. Reserve matters have now also been approved (224785REM) for the northern part of the site encompassing

plots A and B of the original outline approval. Of the overall total (up to 2,083 units) 867 units are now approved in full through 224785REM, and 1,216 remain approved in outline only at this stage. Noting the varying planning status, this future supply is assigned over two rows within the conventional pipeline tab of the updated trajectory (version 3 – March 2026).

In February 2026 the applicant has confirmed via an approved certificate of lawfulness that both the outline and reserve matter approvals have been lawfully implemented. Specifically, demolition works were undertaken between October and November 2025, although further progress in respect of construction work has not been demonstrated as yet. Accordingly, no residential units have been delivered at this site at present, and the approved total of 2,083 still remain part of the future supply pipeline.

Separately the applicant has submitted and secured approval of details (243386CND) of its indicative programme of phasing for the implementation of the whole development. The delivery programme contained within this application has informed the approach taken to phasing this capacity in the trajectory, with the capacity being assigned across future years 4 to 7.

10SO – The Green

Planning permission (215058FULR3) was given in September 2022 for the redevelopment of this site to provide three urban blocks comprising 564 residential units, alongside commercial, employment and community floorspace. This permission encompasses the full allocation site but excludes the electricity sub-station.

Whilst the council own part of the site (Featherstone Terrace Car Park), the delivery of this scheme was contingent on the use of CPO powers (approved in April 2023) to acquire the remaining parts of the site. The council had previously acquired Peabody as a development partner to fund and bring forward the development of the site and manage land assembly.

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 in this study). 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 latter half of the trajectory period (years 8 – 11).

191022FUL – Quayside Quarter (Former Honey Monster Foods)

Planning permission (191022FUL) was given in September 2020 for the demolition of existing buildings and phased redevelopment of the site to provide 1,997 residential units, alongside new industrial, commercial and community space. This permission was secured in January 2021 following the demolition of buildings on the site. Since this earlier clearance works no further construction activity has progressed at the site, and the council understands that this scheme is now unlikely to be built out, and alternative proposals are being pursued at this site.

The site is subject to two pending planning application for alternative uses. These include a pending application 232010FUL (with resolution to grant given in Oct 2023 and draft decision issued March 2025) for a

wholly employment scheme. A second alternative pending scheme (253874FUL) was submitted in October 2025 for a hyperscale data centre and affordable workspace. Neither pending schemes contain any residential component and accordingly are not captured in the trajectory. In light of more recent planning activity, it is assumed that 191022FUL will now not be progressed further and accordingly any residential capacity has been removed from the future pipeline recorded in this trajectory.

This site is not allocated within either the adopted or emerging Local Plan.

11SO – The Green Quarter (Southall Gasworks)

The allocation boundary corresponds with phases 4 to 9 of a wider strategic regeneration scheme.

Phases 1 to 3 sit outside of the allocation boundary. Phase 2 (185158REM / 201123NMA / 216077REM) has yet to commence and is recorded separately in the trajectory as part of the permitted pipeline. Phase 3 (205101REM) is part complete and again is accounted for separately under the pipeline at present.

A new outline masterplan application (234110OUT) was approved in November 2025 for phases 4 to 9 which aligns with the allocation. This approval effectively replaces the outstanding outline phases of the earlier outline approval PP/2015/4682. Under this new masterplan, approval is given for up to a maximum of 582,247 sq. m. of residential floorspace, which based on the proposed mix would equate to 5,566 units. The capacity associated with this permission is currently captured under the pending tab of the trajectory (version 3 – March 2026), as the decision was issued after 31/03/2025.

The approach taken to phasing this capacity within the trajectory has been informed by information supplied by the developer in support of this planning application. Reflecting the scale of the scheme, the Environmental Statement (Volume 1, Chapter C, Section C4.0) accompanying the outline scheme estimates that development (phases 4 to 9) will take approximately 27 years.

This indicates that works are expected to commence in May 2027 and conclude by March 2055. Given the extended development programme only a portion of the 5,566 units proposed will be completed during the life of this plan (i.e. until 2038/39). Noting the anticipated commencement in May 2027, it is assumed that the delivery of the first units built under these phases would not complete before May 2029.

For the purpose of populating the trajectory, and in the absence of other information, the overall capacity (5566) was split equally across 26 years up to and including 2054/55. This would average around 214

units per annum. Whilst it is acknowledged that this distribution of delivery may fluctuate somewhat once reserve matter applications are progressed for each phase, the assumed annualised delivery total input is not considered to be unrealistic. Based on this split 38% (2,140) of the approved capacity is anticipated to complete during the life of the Local Plan, and this figure forms part of the future plan pipeline. The remaining 3,426 is split over 16 years beyond the plan period.

Neither the applicant or agent have supplied an alternative delivery programme to that underpinned by their own Environmental Statement, but the council intends to revisit the evidence and 'take stock' when it prepares each iteration of the trajectory.

Matter 10: Monitoring and Delivery

Action Log 10.4 - Monitoring Framework - To consider how to measure the performance of town plan-based policies and how best to articulate this in the monitoring framework.

LPA Response: The council's earlier response to Block 1 Action 4.2 {EX30 - Action Log 5, Part 5} recognised the value and desire to track and understand delivery and performance at different spatial scales. As noted previously in this earlier response the datasets underpinning many of the measures identified in the Monitoring Framework have spatial attributes attached to them, and therefore it is feasible that reporting can also be broken down to a town level as well.

Whilst the council is committed to ensuring that the outputs and data are accessible at various geographical scales where possible, appropriate and meaningful, the council has not identified any instances where town-based targets should be set, and all targets expressed are LPA based (albeit they may in select cases be linked to a designation with a confined geographical scope).

As detailed in the earlier Block 1 Action 4.2 response a modification (FSMM51) was recommended at the end of paragraph A1.4 advising that the indicators will be reported at a town-based level where it is meaningful to do this and where the availability of the datasets allow this to happen.

To signal for which indicators this may be appropriate, a further suggested update is proposed under the new 'Measure' column of the revised Monitoring Framework defining in each case the geographical scope of each measure indicating if this is LPA, Town or designation based.

Action Log 10.5 - Monitoring Framework - To consider inclusion in the framework monitoring of Policies H16, S5, WLC and SI 7 and how best to articulate these.

LPA Response: The revised Monitoring Framework incorporates additional indicators to monitor the following policies:

- H16: Large Scale Purpose Built Shared living – examining the distribution of large-scale purpose-built shared living accommodation.
- S5: Sports and Recreation Facilities – examining whether a sufficient quality of sports provision is maintained / secured as an outcome of development.
- WLC: Whole Life Cycle Carbon Approach – examining the application of whole life cycle carbon assessments and carbon optioneering.
- SI 7: Reducing Waste and Supporting the Circular Economy – examining the application of the Circular Economy statement process.

Action Log 10.6 - Monitoring Framework - To consider inclusion of heritage matters as contextual indicators in the monitoring framework.

LPA Response: The scope of the Monitoring Framework is described as part of the introductory text to the framework. In preparing this framework the council has prioritised identifying those core indicators which it considers provides the best measure of the direct outcome of Local Plan policies.

Beyond the core indicators listed here the council remains committed to monitoring contextual indicators via future Authorities' Monitoring Reports (AMR). As per earlier AMR outputs a range of heritage-based indicators can be tracked. This includes reporting on change in respect of the number of heritage assets at risk in the LPA area. Updates can also be provided in respect of listings and conservation area reviews, including highlighting where any listed buildings had been demolished as a result of development.

Action Log 10.7 - Monitoring Framework - To review the framework to provide clearer performance measures, indicators and targets.

LPA Response: The Monitoring Framework has been restructured and reworked separating the indicators, measures and targets. The measures and targets have been more precisely defined to aid the monitoring exercise. The revised Monitoring Framework is attached, and the council therefore proposes the following suggested modification:

“Delete Table 1: Monitoring Framework on Pages 484-486 in Appendix 1 and replace with a revised table (attached).”

To reflect this update, the council proposes a number of suggested modifications to the introductory text for the following paragraphs:

Amend Paragraph A1.3 and A1.4 as follows:

“To support this process a Monitoring Framework has been developed. This Monitoring Framework comprises key local performance indicators, which have been carefully selected and developed to support our understanding of the effectiveness of policies in delivering the plan’s vision and spatial strategy.

Measures are defined for each indicator describing specifically the scope of what is to be monitored.

A1.4 The framework identifies which policies **and their component parts** the indicators are intended to measure, ~~and where appropriate targets have also been specified for select indicators.~~ **Targets are defined against the majority of measures.** It is not possible to identify meaningful indicators for all policies in the plan, but the performance indicators identified here are considered to represent the core measures.”

Amend Paragraph A1.6 as follows:

“New and additional **indicators and/or** measures may be identified over-time, and these will be reported through the Authorities Monitoring Framework.”

Amend Paragraph A1.8 as follows:

“Performance against these indicators ~~and~~ measures **and their associated targets** will be reported in Ealing’s Authority Monitoring Framework (AMR). The AMR will also monitor a range of other data that is relevant to understanding the implementation of the plan in the wider context. A number of these indicators also inform national and regional reporting, including notably the Housing Delivery Test and the Infrastructure Funding Statement.”

Action Log 10.8 - Monitoring Framework - To amend the biodiversity target from 20% to 10% to be consistent with Policy G6.

LPA Response: The updated Monitoring Framework (attached) now reflects the revised mandatory minimum target of 10% as per Policy G6.

Action Log 10.9 - Monitoring Framework - To consider amending the monitoring framework to incorporate trigger points and contingencies.

LPA Response: As noted already the framework has been restructured and reworked. The revised framework now incorporates both Trigger Points and Contingencies. Where possible both have been identified for each of the indicators. For a number of the indicators, it has not been possible to identify these in all instances at this stage as it will take time to understand and gauge how policies perform relative to the measures and to consider options for intervention.

To reflect this update, the council proposes a suggestion modification as follows:

Amend Paragraph A1.9 as follows:

“Where monitoring indicates that the vision, spatial strategy or policy targets are not being achieved, we will assess the reasons for this, and consider appropriate measures or actions to remedy underperformance, including adjusting the application of policies, and where necessary through a partial or full review of the Local Plan. **The monitoring framework incorporates trigger points defining when intervention may be appropriate and identifies possible ‘contingencies’ to assist with remedying underperformance.** External factors such as changes in national policy, a London Plan review or changes in local evidence may also trigger a review of this Local Plan.”

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