

GREATER LONDON AUTHORITY

(by email)

Our reference: MGLA140526-9893

4 June 2026

Dear

Thank you for your request for information which the Greater London Authority (GLA) received on 13 May 2026. Your request has been considered under the Environmental Information Regulations (EIR) 2004.

You requested:

Please provide all correspondence with developer around planning for Park View Place, Greenford Road, UB6 0FF

Including but not limited to:

* Correspondence around the current planning application Ealing REF 261463FUL including pre-application discussions including but not limited to correspondence around building on MOL and discussions of MOL boundaries where Ealing and GLA officers have agreed that the proposed development would not be considered as development on MOL

Our response to your request is as follows:

Please find attached the information that the GLA holds within the scope of your request.

Please note that the names and contact details of some members of staff are exempt from disclosure under Regulation 13 (Personal Information) of the Environmental Information Regulations (EIR).

Information that identifies specific employees constitutes personal data, as defined in Article 4(1) of the General Data Protection Regulation (GDPR), meaning any information relating to an identified or identifiable living individual.

Disclosure of this information would contravene the first data protection principle under Article 5(1) of the GDPR, which requires that personal data be processed lawfully, fairly, and in a transparent manner in relation to the data subject.

If you have any further questions relating to this matter, please contact me, quoting the reference MGLA140526-9893.

GREATER **LONDON** AUTHORITY

Yours sincerely

Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

Park View Place

Local Planning Authority: Ealing

The proposal

Residential-led mixed-use development comprising at least 500 residential units and 350 purpose-built shared living units in seven blocks between 6 and 15 storeys, with flexible commercial / community floorspace (Class E / Class F2) and a new pedestrian/cycle link to Grove Farm Park.

The applicant

The applicant is **Interland Group** and **Weston Homes** and the architect is **TP Bennett**.

Assessment summary

The scheme is broadly supported in land use terms however, the scheme would not be eligible for the time-limited planning route and would need to follow the viability tested route. The planning application should address the matters raised in this report.

Context

1. On 29 October 2025 a pre-planning application meeting to discuss a proposal to develop the above site for the above uses was held at the applicant's office (12 Roger Street WC1N 2JU) with the following attendees:

GLA group

- [REDACTED] case officer
- [REDACTED] Team Leader (Development Management)
- [REDACTED] Design Lead

Local Authority

- [REDACTED] Ealing Council (online attendance)

Applicant

- [REDACTED] - Interland
- [REDACTED] - Weston Homes
- [REDACTED] - Weston Homes
- [REDACTED] - TP Bennett
- [REDACTED] - Turley

- [REDACTED] [REDACTED] - Turley
 - [REDACTED] [REDACTED] - Turley
2. The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application.

Site description

3. The application site is bordered to its north by the access road to David Lloyd Centre, to its west by Grove Farm, to its east by Greenford Road and a retail parade fronting onto Greenford Road, and to the south by Atrium Point, the former Kellogg Tower more recently converted into residential units. The site is predominantly occupied by a vacant car park and is designated Metropolitan Open Land (MOL). The site is proposed to be de-designated from MOL under the draft local plan.
4. The site benefits from a previous planning permission 182843FUL granted on 10 January 2020 for a mixed-use scheme comprising 346 residential units (including 107 affordable) and ancillary uses in four buildings. On 23 February 2022 Ealing Council's Planning Committee also resolved to grant planning permission 213378FUL for a mixed-use scheme comprising 288 residential units across five blocks ranging from 6-11 storeys however, the S106 Agreement has not yet been finalised therefore planning permission has not been issued.
5. The site has a Public Transport Accessibility Level (PTAL) of 3 on a scale of 0 to 6b where 6b is the highest. The nearest rail station, Sudbury Hill London Underground (LU) station, is less than 50 metres from the northern boundary of the site and Sudbury Hill Harrow rail station is approximately 200 metres to the north.

Details of this proposal

6. Redevelopment of the site to provide at least 500 residential homes and 340 co-living units in seven buildings ranging between 6 and 16 storeys, including ancillary commercial / community floorspace (Class E / Class F2), car and cycle parking, landscaping, play space, green infrastructure, and private and communal amenity spaces, including a new direct pedestrian / cycle link to Grove Farm Park.
7. The future application is expected to be referable to the Mayor under the following categories of the Mayor of London Order 2008:
- 1A "*Development which comprises or includes the provision of more than 150 houses, flats, of houses and flats*";
 - 1B "*Development which comprises or includes the erection of buildings outside Central London and with a total floorspace of more than 15,000 square metres*";
 - 1C "*Development which comprises or includes the erection of a building of more than 30 metres high outside the City of London*"; and

- 3D “Development on land allocated as Metropolitan Open Land in the development plan which would involve the construction of a building with a floorspace of more than 1,000 square metres”.
8. Pre-application 2024/0766 was held on 30 January 2025 and a follow up meeting, pre-application 2025/839, was held on 29 October 2025. At the initial pre-application meeting 2024/0766 it was agreed that GLA officers would delay issuing the pre-application note until further notice to allow Ealing’s draft Local Plan to progress further, or until there was more certainty about the proposed status of the site’s MOL designation. Ealing’s draft Local Plan (Regulation 22) has been submitted for examination and further information has become available regarding the site designation. This is discussed in detail in the “Land use principles” section of this report.

Strategic planning issues and relevant policies and guidance

9. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Ealing Development Strategy 2026 Development Plan Document (2012); Ealing Development Management Development Plan Document (2013); and the London Plan 2021.
10. The following are relevant material considerations:
- The National Planning Policy Framework and National Planning Practice Guidance; and
 - Ealing’s draft Local Plan (Regulation 22); and
 - A Written Ministerial Statement regarding a package of targeted and temporary emergency support measures to drive up housebuilding in London was issued on the 23 October 2025 by the Secretary of State for Housing, Communities and Local Government. This was accompanied by a joint Policy Statement with the Mayor of London: “Homes for London: a package of support for Housebuilding in the Capital” available [here](#)¹;
 - Draft LPG ‘Support for Housebuilding’ available [here](#)²;
 - Draft National Planning Policy Framework issued 16 December 2025 available [here](#)³; and
 - Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), including on MOL, housing and affordable housing, co-living, urban design and tall buildings, heritage, transport, sustainable development and the environment which can be found on the GLA’s website [here](#)⁴.

¹ <https://questions-statements.parliament.uk/written-statements/detail/2025-10-23/hcws991>

² <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/support-housebuilding-lpg>

³ <https://www.gov.uk/government/consultations/national-planning-policy-framework-proposed-reforms-and-other-changes-to-the-planning-system>

⁴ <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507>

Summary of meeting discussion

11. Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect to land use principles, housing and urban design. Based on the information made available to date, GLA officer advice on these issues is set out within the sections that follow.

Land use principles

Metropolitan Open Land

12. Pursuant to the Ealing Development Strategy 2026 Development Plan Document (2012) in force, the site is designated as Metropolitan Open Land (MOL). London Plan Policy G3 affords MOL the same status and level of protection as Green Belt land. Notwithstanding, Ealing's draft Local Plan (Regulation 22) proposes to de-designate the majority of the site. Given the advanced stage of the draft Local Plan, this would be afforded significant weight in a planning decision.
13. It is noted that a small portion of the site to the north, which would clip the corner of proposed Blocks A, B and C, would remain within MOL. The applicant has submitted a note which sets out that the remaining designation is a procedural error confirmed by Ealing Council.
14. At Stage 2 of 182843FUL GLA officers set out that the principle of the residential-led mixed-use development on a previously developed portion MOL was supported. The current scheme seeks to optimise the site and increase the provision of housing. Although the previous scheme is lower in height and density than the proposed scheme, where GLA officers previously accepted the site as previously developed MOL; where only a very small portion of the site would remain MOL; and given this was an administrative error, GLA officers could consider treating the whole site as de-designated from MOL, subject to confirmation from the LPA on the de-designation status. The planning application should clearly show the revised MOL boundary and specify the area of the site and how much floor space would be within the remaining MOL boundary to clearly demonstrate the low level of impact.

Residential development

15. The previous planning permission 182843FUL for a mixed-use residential-led scheme, comprising 346 residential units, considered the principle of development as acceptable. The proposed scheme would deliver at least 500 new residential units (C3) which is an uplift of 154 new homes compared to the previous consent. The C3 homes are proposed to be provided within Blocks A, B, C, D, F and G. The uplift in residential units would be a welcome contribution towards meeting housing targets set out in the London Plan and the Ealing's adopted and draft Local Plan's and is accepted in land use terms provided confirmation of the proposed de-designation of the site from MOL.
16. The proposed scheme would introduce 340 Large Scale Purpose-Built Shared Living (LSPBSL) or, co-living, units within proposed Block E. The site has a PTAL of 3, is located adjacent to Sudbury Hill Underground Station (Piccadilly Line) and is located close to local shops. GLA officers consider the site is in a

suitable location for the proposed level of LSPBSL accommodation, which is supported in land use terms subject to the LPA securing the LSPBSL accommodation in line with the requirements of London Plan Policy H16.

17. The ancillary commercial uses proposed would provide amenities and services to new and existing residents. This is supported in land use terms.

Housing

18. Since the pre-application meeting, the Support for housebuilding draft London Plan Guidance (LPG) (2025) has been published and although this document has not been adopted, it is a material planning consideration. The draft LPG proposes a series of measures to support housebuilding in London, including a time-limited planning route for the delivery of affordable housing which will operate in parallel to the existing London Plan threshold approach. The time-limited planning route would allow residential schemes on private land that can provide at least 20% affordable housing (by habitable room) to proceed without an upfront viability assessment. It is noted that, under the draft LPG, schemes would be subject to a late-stage review if construction has not reached the delivery milestone by 31 March 2030, to determine whether any additional affordable housing can be provided if viability improves. This is currently set at construction of the first floor of buildings, or for larger phased schemes this would be where the first floor this would be where the first floor of buildings that together provide at least 200 residential units (refer to Section 4.6 of the draft LPG).
19. At the pre-application meeting, it was not yet clear what the time-limited planning route criteria would include, and the applicant set out an offer of 20% affordable housing comprising circa 63% social rent, with the remaining 37% to be shared ownership, with the intention to follow the time-limited route and seek grant to deliver this. Since the pre-application meeting the draft LPG has been published.
20. In line with London Plan Policy G3, MOL is afforded the same status and level of protection as Green Belt, and should be subject to national planning policy tests that apply to the Green Belt. Paragraph 4.4.5 of the draft LPG states that the time-limited planning route does not apply to sites on or released from Grey or Green Belt, with footnote 8 further specifying that these sites are subject to the NPPF Golden Rules.
21. Footnote 8 of the draft LPG further sets out that in line with NPPF footnote 58, the Golden Rules do not apply to: (i) developments brought forward on land released from the Green Belt through plans that were adopted prior to the publication of this Framework; and (ii) developments that were granted planning permission on Green Belt land prior to the publication of the NPPF (December 2024).
22. Although the majority of the site would be de-designated from MOL under the draft Local Plan and notwithstanding Paragraphs 12-14 of this report, the site would be de-designated after the publication of the NPPF (December 2024). As such, the scheme would be subject to NPPF Golden Rules and expected to provide at least 50% affordable housing, as well as necessary contributions to infrastructure and green space provision / improvements. The applicant is

strongly encouraged to revise the scheme and the affordable housing offer in light of this.

23. The proposed 20% affordable housing offer would fall short of a policy compliant affordable housing threshold and the scheme would be subject to the viability tested route. Additional guidance on the viability tested route can be found [here](#)⁵.
24. The applicant has set out they intend to seek grant to deliver the affordable housing. The applicant should refer to the Mayor's update to the Accelerated Funding Route (November 2025) and should engage the GLA's Housing and Land team as soon as possible to discuss grant availability. Engagement should also be undertaken with registered providers early in the design process to ensure that the affordable housing meets their requirements and is deliverable.
25. At the meeting the applicant also requested clarification on the co-living element in relation to time-limited measures. Notwithstanding the site MOL designation, the draft LPG sets out that for a scheme to be eligible it must meet the following criteria:
 - i. The C3 housing (including BtR) provides 20% affordable housing by habitable room, with the Build for Sale element comprising at least 60% social rent, and any BtR element providing at least 30% at or below London Living Rent levels;
 - ii. The LSPBSL comprises less than 50% of the total residential GIA; and
 - iii. The LSPBSL provides a contribution equivalent to 35% of the total internal floorspace (GIA) including shared and communal facilities.
26. The applicant has confirmed the LSPBSL element would be 19.5% by NIA. While it's unlikely the GIA would exceed 50% of the total floorspace, this percentage should be confirmed as part of the future planning application.

Urban design

Development layout

27. The masterplan layout and massing principles have evolved through close consultation with the LPA and Design Review Panel, resulting in a logical approach that creates a legible sequence of public routes through the site.
28. The positioning of Blocks G and F form a successful 'gateway' into the site from Greenford Road, as well as well-defined spaces further within the site, partly framed by the Atrium Point building.
29. The landscaping strategy is well conceived and takes account of the site's typology, which is welcomed. As discussed at the meeting, the applicant team are encouraged to ensure that key zones of public space (including the arrival space from the station to the north and the central space to the south of Block E) are flanked with an appropriate level of active frontage and building entrances to help animate these spaces.

⁵ <https://www.london.gov.uk/programmes-strategies/planning/planning-applications-and-decisions/affordable-housing-and-viability-assessment-process>

30. Consideration should be given to the servicing link to the east of Block E, ensuring it is designed to feel safe and well-lit at all times of the day and night.
31. The older children's play area to the south of Block G is relatively isolated from the wider scheme and should be designed to feel safe and secure, with consideration given to lighting and sightlines from the community space to the north.
32. While focus has been given to creating a pedestrian route through the site, creating strong connections with Grove Farm to the west, the spaces between each pair of point blocks (A and B, C and D) appear dominated by vehicular access/car parking. This risks limiting the ability to form a sense of community in these areas, with residents of these blocks potentially being disconnected from the main area of green space in the centre of the site. To address this, the applicant is encouraged to explore further opportunities to create shared amenity space between each pair of blocks e.g. reducing the amount of hard standing in favour of more green and/or play space.

Residential quality

33. The distribution of blocks of varied typologies across the site, each with efficient footprints, forms good levels of dual aspect, with a reasonable proportion of units benefiting from views out towards the Grove Farm. The application should demonstrate that passive design measures are in place for the single aspect units to avoid overheating, while ensuring good levels of ventilation and daylight/sunlight penetration.

Heights and massing

34. The Ealing Development Management policies document defines tall buildings as those that are substantially taller than their neighbours and/or which would significantly change the skyline. The site is not an area identified in the local plan as suitable for tall buildings and therefore does not comply with the locational criteria set out at London Plan Policy D9 Part B. Notwithstanding, where the visual, functional, environmental and cumulative impacts of the scheme are considered to be acceptable in line with Policy D9 Part C, tall buildings on this site could be considered acceptable.
35. The height and massing has evolved positively through the pre-application process, resulting in a contextual design response to the site, addressing the suburban scale of Greenford Road, mediating in scale between Atrium Point and the openness of Grove Farm to the west. The proximity of the train station to the north also provides justification for the height distribution and density proposed.
36. While attention has been given to introducing a variety of built form, the ground planes of blocks risk being separate from the public spaces they are defining, potentially resulting in lack of passive surveillance. The applicant is encouraged to continue to work with the Council to ensure sightlines to key spaces and legibility of residential entrances are carefully considered.
37. Block E, while being articulated as two portions, is a long linear block, which risks creating an overbearing effect onto the central green space. Options for introducing additional vertical emphasis and 'breaks' to the long facades should be considered further.

38. The attention to detail and predominant use of brick are supported. The applicant should work closely with the Council to secure as much detail as possible as part of any planning permission.

Fire safety

39. In line with London Plan Policy D12 the future application should be accompanied by a fire statement, prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.
40. Further to the above, London Plan Policy D5 seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the buildings.
41. Should any residential building exceed 18-metres, two staircases must be provided to progress under the Government's proposed transitional arrangements, set out in its 24 October 2023 Written Ministerial Statement found [here](#)⁶.

Inclusive access

42. London Plan Policy D3 seeks to ensure that new development achieves the highest standards of accessible and inclusive design (not just the minimum). The future application should ensure that the development: can be entered and used safely, easily and with dignity by all; is convenient and welcoming (with no disabling barriers); and provides independent access without additional undue effort, separation or special treatment.
43. London Plan Policy D5 requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
44. The future application should include an inclusive design statement and plans that show where the wheelchair accessible homes would be located and how many there would be. These should be distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled people. This information and typical flat layouts and plans of the wheelchair accessible homes should be included in the design and access statement. The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.

Heritage

45. The application should be supported by a Heritage Impact Assessment and a Townscape and Visual Impact Assessment which should pay due regard to the

⁶ <https://questions-statements.parliament.uk/written-statements/detail/2023-10-24/hcws1090>

key principles of the GLA's [Heritage Impact Assessments and the Setting of Heritage Assets](#)⁷ practice note. This assessment should address the likely impacts (if any) on the setting of Sudbury Hill Underground Station (listed Grade II); St Andrew's Church Institute (listed Grade II); and the South Hill Conservation Area.

Transport

46. Although transport was not discussed at the meeting on 29 October 2025, the comments below respond to the transport discussion during the initial pre-application meeting on 30 January 2025.

Healthy streets and vision zero

47. In line with London Plan Policy T2, an Active Travel Zone Assessment (ATZ) must be submitted alongside the planning application. The ATZ should assess key routes agreed – including routes to local destinations such as Sudbury Hill Harrow station, nearby schools, bus stops, health facility and the strategic cycle network. The ATZ should reflect both day and nighttime conditions, guidance for which can be found on the TfL Website.
48. As expressed previously, the Healthy Streets principles should be reflected in the design of the internal routes as well as external routes. The design of the internal routes should seek to minimise potential conflicts between active modes and vehicles, including car parking along the internal route.
49. The creation of a public route from Greenford Road to Grove Park Farm is welcomed. The submission should provide some indication of the pedestrian and cycle demand along this route and should ensure crossing points are appropriately located to minimise conflicts between active modes and vehicles. Additionally, the improved active travel route to Sudbury Hill station is welcomed. A plan of the routes for active modes and how these interact with vehicle routes through the site should be provided. All routes should be designed for all users at all times of day, including night. The applicant should refer to the GLA's Good Growth by Design: Safety in Public Spaces.
50. The proposal must demonstrate how it meets the Mayor's Vision Zero objectives. This involves an analysis of collisions on the surrounding road network, and mitigation if necessary. Accordingly, the perpendicular car parking spaces adjacent to the main access, and access to the Atrium Point car park, should be redesigned to reduce potential conflicts between vehicles travelling along the internal road and those turning in/out of the parking bays; and to conflicts between vehicles and active modes.

Impacts and mitigation

51. In accordance with Policy T4, a Transport Assessment (TA) which assesses the trip generation, the developments impact of the transport network, and identifies mitigation if necessary. As discussed previously within the TfL Pre-application, a station impact assessment should be undertaken to assess the potential impacts of the development on Sudbury Hill station. Following the

⁷ <https://www.london.gov.uk/sites/default/files/2024-01/Heritage%20Impact%20Practice%20Note%20%281%29.pdf>

submission of the TA, TfL will determine whether any transport mitigation is required.

Vehicle access and parking

52. The quantum of car parking spaces for Atrium Point has been reduced from 100 to 75, and there is ongoing discussion between the applicant and landlord to establish the contractual requirements for the reprovision of car parking spaces. As stated at the meeting, there is still a lack of detail on how the Atrium Point car park would be managed to prevent access for occupiers of the new development. These details should be set out in the TA and secured within any subsequent planning permission. Preventing occupiers of the proposed development from using the Atrium Point car park is required in terms of compliance with London Plan Policy T6.
53. The intention to provide policy-compliant (London Plan Policy T5) long-stay cycle parking at the ground floor level in each of the proposed blocks is noted. The details of this should be set out in the submission documents. It is expected that short-stay cycle parking would be provided in the public realm. All cycle parking should follow London Cycle Design Standards guidance to ensure the quality requirements of cycle parking is met. Showers, changing and locker facilities should be provided for the non-residential elements.

Delivery and servicing

54. Details on the delivery and servicing strategy for the site have not been provided. As stated at the meeting, the applicant should provide a plan showing access and internal routes delivery and servicing, loading bays, refuse storage locations, and turning facilities (supported with swept path diagrams). The TA is also expected to include the trip generation for delivery and servicing vehicles. The applicant is expected to submit a Delivery and Service Plan (DSP) alongside the application.

Management plans

55. The application must be accompanied by an outline Construction Logistics Plan (CLP) (prepared in line with TfL's [CLP Guidance](#)⁸), DSP and a Travel Plan (prepared in line with TfL's [Travel Planning Guidance](#)⁹).

Sustainable development

Energy strategy

56. Although energy was not discussed at the meeting on 29 October 2025, the comments below respond to the sustainability information provided for the pre-application meeting on 30 January 2025.
57. Applicants should follow the [GLA Energy Assessment Guidance 2022](#)¹⁰ which sets out the information that should be provided within the energy assessment to be submitted with a planning application.

⁸ <https://content.tfl.gov.uk/clp-guidance-clocs.pdf>

⁹ <https://tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans>

¹⁰ https://www.london.gov.uk/sites/default/files/gla_energy_assessment_guidance_june_2022_0.pdf

Net zero carbon target

58. The London Plan requires all major developments to meet the Mayor's net-zero carbon target, and so carbon savings must be maximised on site. At the very minimum, an on-site 35% reduction in carbon emissions beyond Part L of 2021 Building Regulations must be met.
59. Applicants should submit a completed [Carbon Emissions Reporting spreadsheet](#)¹¹ alongside any planning application to confirm the anticipated carbon performance of the development.
60. The carbon emission figures should be reported against a Part L 2021 baseline. Sample SAP full calculation worksheets (both DER and TER sheets) and BRUKL sheets for all stages of the energy hierarchy should be provided to support the savings claimed.

Be Lean demand reduction

61. London Plan Policy SI2 requires applicants to meet the London Plan energy efficiency targets:
 - a. **Residential** – at least a 10% improvement on Part L of 2021 Building Regulations from energy efficiency measures alone
 - b. **Non-residential** – at least a 15% improvement on Part L of 2021 Building Regulations from energy efficiency measures alone
62. For the residential element, the applicant should make sure to use the notional gas boiler efficiency of 89.5% for the residential element. The applicant is proposing good u-values across the site. This is welcomed.
63. Although certain constraints can be appreciated, the applicant should ensure that the carbon emission reductions for the non-residential element are maximised and look to perform better than the notional building in all energy end use consumption. The applicant should make sure to use the notional efficiencies with a heat pump space heating efficiency of 2.64 and 2.86 for domestic hot water.
64. The applicant should minimise the estimated energy costs to occupants and set out measures to protect the consumer from high prices, including through energy demand reductions and quality assurance mechanisms.

Be Clean heating infrastructure

65. The applicant should investigate opportunities for connection to nearby existing or planned district heating networks (DHNs). Where such opportunities exist, this should be the priority for supplying heat to the site in line with the London Plan heating hierarchy. Evidence of this investigation should be provided including evidence of active two-way communication with the network operator, the local authority and other relevant parties. This should include information on connection timescales and confirmation that the network has available capacity. See the guidance for full details on the information to be provided.
66. No local proposed or existing heat networks are shown on the London Heat Map. The applicant should contact the local borough officer, local developers or

¹¹ <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>

any other parties and ask if they know of any opportunities. The applicant has mentioned some opportunities they have recently explored. Evidence of correspondence should be submitted.

67. The site should be provided with a single point of connection and a communal heating network where all buildings/uses on site will be connected. The heat loads that are connected to the site-wide heat network should be maximised. Relevant drawings/schematics demonstrating the above should be provided.
68. The applicant is a block by block energy centre approach (4 energy centres). This is due to supply constraints on site limiting the use of a single centralised energy centre. The applicant should provide full details of these complications/restrictions within the submission. The applicant should robustly justify how the number of energy centres has been minimised as far as possible. The applicant should commit to providing trenches between blocks to ultimately connect the network into a site-wide system for future DHN connection.
69. Relevant drawings/schematics of the network design should be provided.
70. The applicant should provide evidence confirming that the development is future proofed for connection to wider district networks now or in the future, where an immediate connection is not available.
71. Where a DHN connection is not available, either now or in the future, applicants should follow the London Plan heating hierarchy to identify a suitable communal heating system for the site.
72. The London Plan limits the role of CHP to low-emission CHP and only in instances where it can support the delivery of an area-wide heat network at large, strategic sites. Applicants proposing to use low-emission CHP will be asked to provide sufficient information to justify its use and strategic role while ensuring that the carbon and air quality impact is minimised.

Be Green renewable energy

73. All major development proposals should maximise opportunities for renewable energy generation by producing, using, and storing renewable energy on-site. This is regardless of whether or not the 35% on-site target has already been met through earlier stages of the energy hierarchy.
74. Solar PV should be maximised. Applicants should submit the total PV system output (kWp) and a detailed roof plan (for all roofs) showing that the proposed installation has been maximised for the available roof area and clearly outlining any constraints to further PV. The applicant is expected to situate PVs on green/brown roofs and explore integration with amenity areas.
75. Should heat pumps be proposed, the applicant will be expected to demonstrate a high specification of energy efficiency measures under Be Lean, a thorough performance analysis of the heat pump system and, where there are opportunities for DHN connection, that the system is compatible. The detail submitted on heat pumps should include the information set out on pages 46 to 49 of the guidance:
 - a. An estimate of the heating and/or cooling energy (MWh/annum) the heat pumps would provide to the development and the percentage of

contribution to the site's heat loads. The applicant will be required to demonstrate how the heat fraction from heat pump technologies will be maximised.

- b. Details of how the Seasonal Coefficient of Performance (SCOP) and Seasonal Energy Efficiency ratio (SEER) has been calculated for the energy modelling. This should be based on a dynamic calculation of the system boundaries over the course of a year i.e. incorporating variations in source temperatures and the design sink temperatures (for space heat and hot water).
 - c. The expected heat source temperature and the heat distribution system temperature with an explanation of how the difference will be minimised to ensure the system runs efficiently. The distribution loss factor should be calculated based on the above information and used for calculation purposes.
76. Should an ambient loop heat network be proposed, the applicant will be required to engage with local DHN stakeholders and demonstrate that proposals will be compatible and commercially viable for future connection to district heating.

Energy flexibility

77. The applicant should also investigate the potential for energy flexibility in new developments in line with the guidance, including proposals to reduce the amount of capacity required for each site and to reduce peak demand. The measures followed to achieve this should be set out in its energy assessment.

Be Seen energy monitoring

78. The development's energy performance should be monitored and reported on through an online monitoring portal. Guidance to support this monitoring is available [here](#)¹². The development must be designed to enable post construction monitoring and the information set out in the 'Be Seen' guidance should be submitted to the GLA's portal at the appropriate reporting stages via the online [webforms](#)¹³. This would be secured through the S106 agreement using the GLA's suggested [legal wording](#)¹⁴.

Carbon offsetting

79. The applicant should maximise carbon emission reductions on-site, aiming to meet the zero carbon target. Should the site fall short of the carbon reduction targets and clearly demonstrate that no further carbon savings can be achieved, the applicant would be required to make a cash-in-lieu contribution to the borough's carbon offset fund using the GLA's recommended carbon offset price or, where a local price has been set, the borough's carbon offset price.
80. Energy strategies should provide a calculation of the shortfall in carbon emissions and the offset payment that will be made to the borough.

¹² <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance>

¹³ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance>

¹⁴ https://www.london.gov.uk/sites/default/files/be_seen_draft_legal_wording_may_22.pdf

Cooling and overheating

81. In line with London Plan Policy SI 4, the cooling hierarchy should be followed to reduce the potential for internal overheating. At the top of the hierarchy, measures to reduce the amount of heat entering the building should be considered, followed by measures to minimise internal heat generation and manage heat within the building.
82. The Good Homes Alliance (GHA) Early Stage Overheating Risk Tool should be submitted to the GLA alongside any planning application to identify potential overheating risk and passive responses early in the design process.
83. Evidence should be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with the cooling hierarchy. Dynamic overheating modelling in line with CIBSE Guidance should be carried out (TM59 for residential taking into account the associated Approved Document O requirements and TM52 for non-residential) for all TM49 weather scenarios. It is expected that external shading will form part of major proposals. All applications are expected to comply with the DSY1 and maximise compliance with DSY2 & DSY3 by enhancing passive measures.
84. The applicant has explored passive design and has mentioned the use of external shading, cross ventilation and thermal mass. This is welcomed. All passive design measures should be thoroughly investigated, this should include assessments of the following fixed shading devices; external shutters, external blinds and ventilated louvres. If acoustic constraints exist, the applicant should make sure to present one version of the overheating assessment with windows closed and one with windows open in order to show compliance (passive measures only). Peak lopping should be prioritized over active cooling if any cooling is needed to achieve compliance with DSY1. Full details of the peak lopping set point and control strategy should be provided alongside information on the number of units requiring peak lopping.
85. The area weighted average (MJ/m²) and total (MJ/year) cooling demand for the actual and notional building should be provided and the applicant should demonstrate that the actual building's cooling demand is lower than the notional.

Whole Life-Cycle Carbon Assessment

86. In accordance with London Plan Policy SI 2 the applicant will be expected to calculate and reduce whole life-cycle carbon emissions to fully capture the development's carbon footprint.
87. The applicant should submit a whole life-cycle carbon assessment to the GLA as part of any planning application submission, following the Whole Life-Cycle Carbon Assessment Guidance and using the GLA's reporting template. The applicant will also be conditioned to submit a post-construction assessment to report on the development's actual WLC emissions. The assessment guidance and template are available on the GLA [website](https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance)¹⁵.

¹⁵ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

Circular economy

88. Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI 7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.
89. Therefore, the applicant is required to submit a Circular Economy Statement in accordance with the GLA guidance. The applicant will also be conditioned to submit a post-construction report, with suggested wording available on the GLA [website](#)¹⁶.

Environmental issues

Urban greening and biodiversity

90. The applicant must calculate the Urban Greening Factor and Biodiversity Net Gain and seek to achieve the specified target prior to the submission of the planning application.
91. The northern part of the site appears to form part of a wider Site of Importance for Nature Conservation (SINC) designation. The applicant should make this clear in the planning application and, where impacts to the SINC are unavoidable, the scheme should minimise and mitigate impacts in line with London Plan Policy G6.

Sustainable drainage and flood risk

92. The drainage strategy should aim to reduce surface water discharge from the site to greenfield rates and manage surface water run-off in line with the hierarchy set out within London Plan Policy SI 13. Use of Sustainable Drainage System (SuDS) measures should be maximised. Water efficiency measures and rainwater harvesting should also be incorporated into the scheme design.

Air quality

93. The applicant must provide an air quality assessment which should demonstrate that the scheme would be air quality neutral and identify any required mitigation.

Conclusion

94. The scheme is broadly supported in land use terms however, the scheme would not be eligible for the time-limited planning route and would need to follow the viability tested route. The planning application should address the matters raised in this report.

for further information, contact GLA Planning Unit (Development Management Team):

■■■■ ■■■■■ **Principal Strategic Planner (case officer)**

email: ■■■■■@london.gov.uk

¹⁶ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

From: [REDACTED]
To: [REDACTED]
Subject: RE: Park View Place - GLA Pre-app 2024/0766/P2I
Date: 30 January 2025 09:33:40
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image803502.png](#)
[image068780.png](#)
[image617157.png](#)
[Park View Place, Ealing - GLA Pre-application cover letter \(002\).pdf](#)

Importance: High

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Thanks [REDACTED]
I've shared with the wider team, and noted on [REDACTED] attendance. [REDACTED] will run through his slides when we come to 7. on the agenda. Apologies for the short notice on this, as we were hoping to provide a note from Quod on the affordable housing position in advance of the meeting. However, this work is still ongoing and whilst our offer is still 35% on site affordable housing by hab-room for both C3 and the PBSL, the proposed tenure split is now 70:30 in favour of intermediate rent by hab-room. I've updated our cover letter attached to reflect this.
Kind regards,
[REDACTED]

Turley

Mobile: +44 [REDACTED]
Office: 020 [REDACTED]

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From: [REDACTED]
Sent: 29 January 2025 17:03
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Park View Place - GLA Pre-app 2024/0766/P2I

Hi [REDACTED]
Ahead of the pre-app tomorrow, please see attached agenda – please circulate amongst your team. Sorry it's only coming through now – I've only just had confirmation from our energy officer, [REDACTED] who will need to join a bit later so if any slides on sustainability could be covered later in the meeting, that would be really helpful.
Thanks,
[REDACTED]

From: [REDACTED]
Sent: Friday, January 24, 2025 12:10 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Park View Place - GLA Pre-app 2024/0766/P2I

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Hi [REDACTED]
I can confirm everything is uploaded on the ShareFile.
We look forward to discussing next week, but in the interim, if you have any queries please let us know?
Many thanks,
[REDACTED]

Turley

Mobile: +44 [REDACTED]
Office: 020 [REDACTED]

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From: [redacted] <[redacted]@turley.co.uk>
Sent: 22 January 2025 11:52
To: [redacted] <[redacted]@london.gov.uk>
Cc: [redacted] <[redacted]@interland.co.uk>
Subject: RE: Park View Place - GLA Pre-app 2024/0766/P2I

Thanks [redacted]
That's much appreciated, I'll let you know as soon as it's uploaded.
We've got the teams link too, so thanks for this.

Kind regards,

[redacted]
[redacted]

Turley

Mobile: +44 [redacted]

Office: 020 [redacted]

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From: [redacted] <[redacted]@london.gov.uk>
Sent: 22 January 2025 11:34
To: [redacted] <[redacted]@turley.co.uk>
Cc: [redacted] <[redacted]@interland.co.uk>
Subject: RE: Park View Place - GLA Pre-app 2024/0766/P2I

Hi [redacted]
Please save the docs here: [Park View Place](#)

Let me know once you've uploaded the docs as it doesn't notify me unfortunately. If the docs won't be ready until tomorrow, that's fine.

Thanks for providing the list. I'll add these to the meeting agenda which I'll circulate next week.

This meeting will be online. Hopefully you've been sent a Teams meeting link but if not, please let me know ASAP.

Thanks,

[redacted]

From: [redacted] <[redacted]@turley.co.uk>
Sent: Wednesday, January 22, 2025 8:53 AM
To: [redacted] <[redacted]@london.gov.uk>
Cc: [redacted] <[redacted]@interland.co.uk>
Subject: RE: Park View Place - GLA Pre-app 2024/0766/P2I

CAUTION: This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi [redacted]

Thanks for your email. We were working on sending a full pack (design presentation, planning cover letter and energy strategy) tomorrow, a week in advance of the call to allow officers to review, however noting your timescales we will get this over to you by COP today.

Could you please send an MS Sharepoint link for the design presentation please?

In terms of attendees, it will be:

- [redacted] (Interland)
- [redacted] (TP Bennett)
- [redacted] (Townshends)
- [redacted] (Integration)
- [redacted] (KMDC)
- [redacted] (KMDC)
- [redacted] (Turley)
- [redacted] (Turley)

We understood this would be virtual, however could you please confirm?

Kind regards,

[redacted]

[redacted]
[redacted]

Turley

Mobile: +44 [redacted]

Office: 020 [redacted]

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From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 21 January 2025 12:47

To: [REDACTED] <[REDACTED]@interland.co.uk>

Subject: Park View Place - GLA Pre-app 2024/0766/P2I

Hi [REDACTED]

I am the GLA case officer who has been allocated your pre-application, scheduled for 30 January 2025.

Could you please ensure you've provided me with a copy of all documents you would like reviewed by EOD tomorrow? This will ensure myself and my colleagues have enough time to review the docs ahead of the meeting. If the file/s are too large for email, please send via MS sharepoint (I can send a link if you need, just let me know).

Could you please also provide a list of attendees from your team?

I'll send you a meeting agenda next week ahead of the meeting.

Thanks,

[REDACTED]
[REDACTED]

Senior Strategic Planner, Development Management

Greater London Authority

169 Union Street London SE1 0LL

[london.gov.uk](https://www.london.gov.uk)

[REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

My pronouns are: [REDACTED]

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<https://www.london.gov.uk/>

23 January 2025

Delivered by GLA PAWS

Our ref: **INTL3003**

■■■■■■■■■■ ■■■■■■■■■■
Strategic Planning Applications
Development Management
Greater London Authority
City Hall
More London Riverside
London
SE1 2AA

Dear ■■■■■■■■■■

PARK VIEW PLACE, GREENFORD ROAD, SUDBURY HILL, UB6 0JA - LB EALING

GLA PRE-APPLICATION SUBMISSION

Please find enclosed a pre-application submission made on behalf of Interland Group with respect to their site at Park View Place, Greenford Road, Sudbury Hill, UB6 0JA (“the site”). The site lies adjacent to the north of, and surrounds, the former Kellogg Tower office complex in Greenford, which used to comprise the headquarters of the engineering firm Kellogg. The application site comprises approximately 2.4ha and lies on the western side of Greenford Road near its junction with Whitton Avenue West.

The site has been subject to previous planning applications for its redevelopment for residential led proposals, with the northern half of the site receiving planning permission for a mixed-use development of 5 blocks with 346 residential units (Ref: 182843FUL – GLA ref. 2019/4109/S2/S2) in 2020. The southern half subsequently received resolution to grant planning permission in February 2022 (Ref. 213378FUL GLA ref. 2021/0556/S1) for 288 residential units, 426sqm of commercial floorspace and 166sqm of community space within five buildings of between 6 and 11 storeys. The original ‘Building 1’, consented as part of the application ref. 182843FUL, was superseded by a smaller alternative ‘Building 1’ under application ref. 213378FUL and consequently, the total number of homes with planning permission and resolution to grant at the site is 558 homes, of which 204 are affordable housing.

Since the original permission was consented in February 2020 a number of factors, including the COVID-19 Pandemic, Ukraine War and associated period of high inflation, plus the change in fire regulations which now mandate a second stair core (all of the consented blocks contain only a single stair per core

Brownlow Yard
12 Roger Street
London
WC1N 2JU

T 020 ■■■■■■■■■■ turley.co.uk

and therefore require amending) have significantly increased build costs associated with the existing scheme.

Consequently, Interland Group, and their Development Managers KMDC, have been progressing with detailed pre-application discussions with planning officers from the London Borough of Ealing (LBE) with respect to new plans to redevelop the sites for residential and Purpose Built Shared Living (PBSL) uses along with commercial and community spaces plus extensive landscaping.

TP Bennett have been appointed to prepare proposals for the site's regeneration. We would welcome your advice prior to the submission of a planning application in Spring 2024.

In support of this pre-application submission we include the following:

- A Design Briefing Document, prepared by TP Bennett; and,
- Energy and Sustainability Strategy prepared by Integration.

SITE AND CONTEXT

The site lies just north of, and surrounds, Atrium Point (formerly Kellog Tower), a group of 10 storey, former office buildings converted into 263 flats (Ref: PAN/2015/5736). The site itself contains a large area of surface car parking, a hardstanding entrance area and an open landscaped area to the south of Atrium Point. Mature trees adjoin the Greenford Road and Whitton Avenue boundaries. The surrounding area is characterised mainly by a mix of residential uses and open space, but with some retail, commercial, leisure and educational uses nearby.

A site location plan extract illustrating the site extent provided in **Figure 1** below.



Figure 1: Site Location (outlined in red)

To the north-east of the site lies a small parade of shops on Greenford Road, designated as a Neighbourhood Centre, with two storey residential properties lying to the east across Greenford Road. To the west and north-west and to the south of Atrium Point lies Grove Farm Park, a large area of public open space.

The site lies approximately 70m south of Sudbury Hill Underground Station on the Piccadilly Line while Sudbury Hill Harrow overground station is some 280m away. The Public Transport Accessibility Level (PTAL) of the site is Part-4 (high), Part 3 (good). The main vehicle and pedestrian entrances are both on Greenford Road, in the south-eastern and northern parts of the site.

The site lies within designated Metropolitan Open Land (MOL), however the emerging Local Plan Final Proposals (Regulation 19) proposes to de-designate the site from the MOL. The adjoining Grove Farm Park is designated as Public Open Space and Community Open Space within MOL. Part of this open space is also designated as a Local Nature Reserve and Site of Importance for Nature Conservation (SINC).

The site contains no Statutory or Locally Listed buildings, and is not located within a Conservation Area. However, the Grade II listed Sudbury Hill Underground Station and generating station and the locally listed The Rising Sun Public House are both located to the north of the site along Greenford Road. The site is also located within in Flood Risk Zone 1, with a low risk of flooding.

PROPOSED DEVELOPMENT

Interland Group are seeking to redevelop the site for c.550 residential units and c.350-400 PBSL units across 8 blocks, ranging in height from 6 to 15 storeys. Blocks A, B, C1, C2, E, F and G comprises the residential blocks, with Block D proposed as PBSL. Further details are set out within the Design Briefing Document prepared by TP Bennett.

The accommodation schedule for current proposals is as follows:

	1Bed 1P	1Bed 2P	2Bed 3P	2Bed 4P	3bed 5P	3bed 6P	4Bed 6P	Total
Market	21	140	21	117	22	0	0	321
%	7%	44%	7%	36%	7%	0%	0%	
Intermediate	0	84	26	40	4	0	0	154
%	0%	55%	17%	26%	3%	0%	0%	
Affordable rent	0	13	9	5	19	14	12	72
%	0%	18%	13%	7%	26%	19%	17%	
Total	21	237	56	162	45	14	12	547
%	4%	43%	10%	30%	8%	3%	2%	

The affordable housing provision represents a 35% provision, with a 30:70 tenure split between affordable rent and intermediate, by habitable room. This includes a 35% on site affordable housing provision for the PBSL (by hab. room), calculated by dividing the NIA of affordable housing required as a proportion of the proposed co-living accommodation by the average NIA per habitable room of affordable housing.

The scheme also includes extensive landscaping, seeking to form an extension to the Grove Farm Park, which will be connected through the site through a new pedestrian and cycle bridge to Grove Farm Park.

Key Planning Considerations

Loss of existing uses

As set out above, the site comprises a large area of surface car parking, a hardstanding entrance area and an open landscaped area, and consequently, there are no protected land uses on site.

Furthermore, the principle of development of the site has already been accepted through planning permission Ref: 182843FUL (GLA ref. 2019/4109/S2/S2) and resolution to grant planning permission for application ref. 213378FUL (GLA ref. 2021/0556/S1)

Principle of Residential Accommodation

Increasing the current housing stock is an important strategic objective for the London Borough of Ealing. Policy H1 of The London Plan (2021) aims to optimise the potential for housing delivery on all suitable and available brownfield sites especially in areas with PTAL levels of between 3-6 or within 800m of a station.

This is supported by London Plan policy D3 which aims to make the best use of land by following a design led approach that optimises the capacity of sites. Section 11 of the National Planning Policy Framework ('Making Effective Use of Land') encourages as much use as possible of previously developed land and vacant buildings as well as optimising the use of land to meet as much of the identified need for housing as possible.

Consequently, planning policy fully supports the provision of residential uses at the site, however in any case the principle of residential development at this site has already been accepted under application refs. 182843FUL & 213378FUL.

Purpose Built Shared Living Accommodation

London Plan Policy H16 states that PBSL is acceptable in locations that are well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency. Furthermore, the policy stipulates PBSL must contribute towards mixed and inclusive neighbourhoods.

The site is located in an area of PTAL 3/4, meaning it has high public transport accessibility and is located adjacent directly adjacent to the Sudbury Hill Neighbourhood centre, and consequently in close proximity to a number of local facilities and services.

In addition, as part of a mix of uses alongside C3 self-contained units (including affordable housing), the inclusion of PBSL in the site would ensure a truly mixed and inclusive neighbourhoods with a range of housing typologies and tenures providing the local community a range of housing choice. Furthermore, it provides the opportunity for PBSL residents to stay within the local area, and indeed specifically the site, should they decide to progress to a larger home.

Whilst it is noted that the emerging Local Plan's local variation of Policy H16 states that PBSL must not compromise the supply of class C3 self-contained homes as part of a mix of uses, within the current proposals PBSL can be delivered as a mix of uses at the site without significantly affecting the total provision of consented C3 residential units at the site, whilst achieving an increased delivery of affordable housing.

Due to the unique economic circumstances surrounding PBSL, the inclusion of the use is fundamental to the viability of creating a fully inclusive and mixed housing community, and as such the delivery of the development of the site as a whole. Consequently, its inclusion underpins the delivery of the residential uses at the site, including a strategic contribution to affordable housing.

Furthermore, there will be a bespoke occupier for the PBSL accommodation (i.e. a specific PBSL provider), and the use does not compete (in terms of market absorption / sales etc) with conventional C3 residential use, meaning the inclusion of the use at the site de-risks the development as a whole and includes multiple development 'exit routes' with the development.

This also ensures it can be built and delivered alongside other residential uses and negates the need for a phased redevelopment of the site. Its inclusion therefore ultimately speeds up delivery of the C3 self-contained homes, including affordable housing, as well as the entire site and aids the contribution to the Borough's housing need faster.

This is recognised in Paragraph 71 of the NPPF (2024) which states:

"Mixed tenure sites can provide a range of benefits, including creating diverse communities and supporting timely build out rates, and local planning authorities should support their development through their policies and decisions."

Consequently, it is considered that the inclusion of PBSL as part of a mix of residential uses within a proposed site allocation for the site is considered acceptable on the basis it ensures the redevelopment of the site is deliverable, suitable, available and economically viable (in line with the definition of deliverable housing sites set out in NPPF Paragraph 72 and its Glossary).

Housing Mix

In accordance with London Plan Policy H10, and Ealing emerging Policy HOU: affordable housing, the scheme seeks to deliver a mix of unit sizes across a range of tenures whilst optimising the housing potential of the sites.

Affordable Housing

The affordable housing provision represents a 35% provision, with a 30:70 tenure split between affordable rent and intermediate, by habitable room. This includes a 35% on site affordable housing provision for the PBSL (by hab. room), calculated by dividing the NIA of affordable housing required as a proportion of the proposed co-living accommodation by the average NIA per habitable room of affordable housing.

This is therefore considered to meet the requirements of London Plan Policies H5 and H6, plus the Mayor's Affordable Housing and Viability SPG, for a fast track compliant scheme, with a tenure mix providing at least 30% low-cost rent and 30% as intermediate units, with the remaining 40% provision up to the discretion of the LPA.

MOL

The site lies wholly within Metropolitan Open Land (MOL) and London Plan Policy G3 strongly resists inappropriate development of MOL and afford it the same protection as Green Belt. The NPPF also resists inappropriate development in Green Belt, which would include residential development, unless very special circumstances exist to outweigh this.

As an exception, paragraph 154 of the NPPF allows for limited infilling or the partial or complete redevelopment of previously developed land within Green Belt, whether redundant or in continuing use which would:

- not have a greater impact on the openness of the Green Belt than the existing development; or
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

Firstly, whilst the site is located within Metropolitan Open Land, however it is critical to note that the emerging Ealing local plan proposes to de-designate the site as MOL.

Secondly, the redevelopment of the site has been previously been found to be acceptable development within MOL, meeting the above tests of the NPPF. This was on the basis that the proposal contributed significantly towards an identified affordable housing need, re-used previously developed land, and whilst there was some impact on the openness of MOL, there was no substantial harm and, on balance, the proposal was considered to meet the exception test of the NPPF and there was no need to demonstrate very special circumstances.

The new proposals include an increase in buildings and new occupants on site which would harm the physical openness of the site. Furthermore, the development is visible in views towards the site from within the Grove Farm Park MOL and would cause some harm to the visual openness of the MOL. As the proposals include an increase in height on site, this harm to openness would be greater than the consented scheme. Consequently, to meet the exception test within paragraph 154 of the NPPF it must demonstrate that the development provides a strong, policy compliant affordable housing offer and tenure mix.

As set out above, the site is considered to meet the requirements of London Plan Policies H5 and H6, plus Mayor's Affordable Housing and Viability SPG, for a fast track compliant scheme, in both total affordable housing provision and tenure mix.

Furthermore, the following elements of the proposed development can, in combination, be considered to provide benefits that would enhance the MOL land and offset any harm:

- a new pedestrian and cycle bridge to Grove Farm Park;
- improved public access to and through the site, including a new entrance off Greenford Road and a green corridor providing a route for pedestrians and cyclists into Grove Farm Park;
- new public community space;
- a large policy compliant children's play space provision;
- removal of substantial of hardstanding within the site;
- further improvements to Grove Farm to be agreed I discussion with the Friends of Grove Farm.

Consequently, it is considered that the proposed development would still meet exception tests set out within paragraph 154 of the NPPF and would not need to demonstrate very special circumstances.

Tall Buildings

London Plan Policy D9 seeks to manage the development and design of tall buildings within London. It states that tall buildings should only be developed in locations identified as suitable in development plans, and sets forth visual, functional, environmental, and cumulative impacts to be addressed.

Ealing's Local Plan defines tall buildings as ones which are substantially taller than their neighbours and/or which significantly change the skyline, and Ealing's emerging Local Plan does not designate the site as an area appropriate for tall buildings and sets the threshold for tall buildings in the Greenford Area as 6 storey's tall. As such, the site does not comply with the locational requirements in part B Policy D9 and the acceptability of tall buildings in this location must be assessed against Part C of the policy.

It is important to note that the site is directly adjacent to Atrium point which is 10 storeys high (built as an office with larger floor-to-ceiling heights than a residential building), and as such adjacent to an existing tall building under Ealing's Local plan definition. Furthermore, the site already benefits from planning permission / resolution to grant permission for buildings up to 11 storeys, with no adverse impact to surrounding receptors identified.

In consideration of the Council's undersupply of new homes in recent years and pressure to deliver new developments at appropriate densities, it is considered the inclusion buildings taller than those consented is appropriate and will meet the following aspirations:

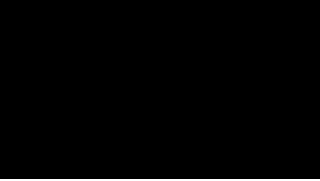
- Make most effective use of well-connected brownfield land to meet evidenced need (NPPF Para. 124 and 125d; London Plan Policy GG2);
- Build at appropriate densities (NPPF Para. 129 and London Plan Policy GG2); and
- Achieve optimum site capacities (through testing design options) (London Plan Policy D3).

Other Planning Considerations

- **Residential quality** - Detailed consideration will be given to compliance with the Council's and GLA design standards including the quality of accommodation, internal space standards, provision of amenity space and other important design aspects including amenity / daylight and sunlight / overlooking and sense of enclosure. The current proposals include c.70% dual aspect units for the C3 residential accommodation.
- **Energy and Sustainability** – A full energy, sustainability and overheating strategy, prepared by Integration, supports this pre-app submission setting out the strategy for complying with London Plan and LPG requirements.
- **Biodiversity and Urban Greening** – Due to the sites location adjacent to a Local Nature Reserve and Site of Importance for Nature Conservation (SINC) biodiversity and urban greening is a key driver of Townshends landscape design, with the sim to exceed UGF and Biodiversity Net Gain Requirements.
- **Play Space** – The proposals include a policy complaint play space provision for all ages with a total provision of 2,178sqm

The emerging proposals represent a hugely exciting opportunity for Interland Group to deliver a sustainable future housing development at an appropriate, brownfield site that can deliver a strategic contribution to the Borough's Housing Need, whilst also ensuring a range of residential uses, in a truly mixed and balanced community, which can ensure delivery of the site and its associated public benefits.

Yours sincerely,



[Redacted]

[Redacted]

[Redacted] turley.co.uk

From: [REDACTED]
To: [REDACTED]
Subject: RE: Park View Place - GLA pre-app 2024/0766
Date: 14 March 2025 09:12:13
Attachments: [image295974.png](#)
[image095372.png](#)
[image472738.png](#)
[A12293_Park_View_Place_GLA_SupplementaryInformationPack.pdf](#)

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Hi [REDACTED]

I hope you're well?

As an update, I understand we're due to hear back from Ealing regarding the MOL shortly.

However, going back through notes we realised you had also asked us for more info on the PBSL and residential layouts, which we didn't have time to present, so these can be reviewed for your response. Consequently, we've pulled together the attached info. Finally, you also mentioned you could send through some guidance on the PBSL affordable housing contribution in advance of the pre-app response being issued?

Kind regards,

[REDACTED]
[REDACTED]
[REDACTED]

Turley

Mobile: +44 [REDACTED]
Office: 020 [REDACTED]

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From: [REDACTED] [\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)
Sent: 03 March 2025 11:48
To: [REDACTED] [\[REDACTED\]@ealing.gov.uk](mailto:[REDACTED]@ealing.gov.uk); [REDACTED] [\[REDACTED\]@turley.co.uk](mailto:[REDACTED]@turley.co.uk)
Subject: Park View Place - GLA pre-app 2024/0766

Hi [REDACTED] and [REDACTED]

Following on from the pre-application meeting about development at Park View place on 30/01, I'm just touching base to see whether there has been any update on confirming whether the MOL designation would be removed by the time a planning application is submitted, or even by the time a decision is made on the application?

As discussed during the meeting, it would be preferable to issue the pre-app note with a more definitive understanding of the designation/de-designation. However, if a better understanding of this position is still looking to be quite a way off do let me know so as not to unnecessarily delay issuing the note.

Thanks,

[REDACTED]
[REDACTED]

Senior Strategic Planner, Development Management
Greater London Authority
169 Union Street London SE1 0LL
[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

My pronouns are: [REDACTED]

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<https://www.london.gov.uk/>

Park View Place

GLA Pre-Application Supplementary Information Pack




13th February 2025

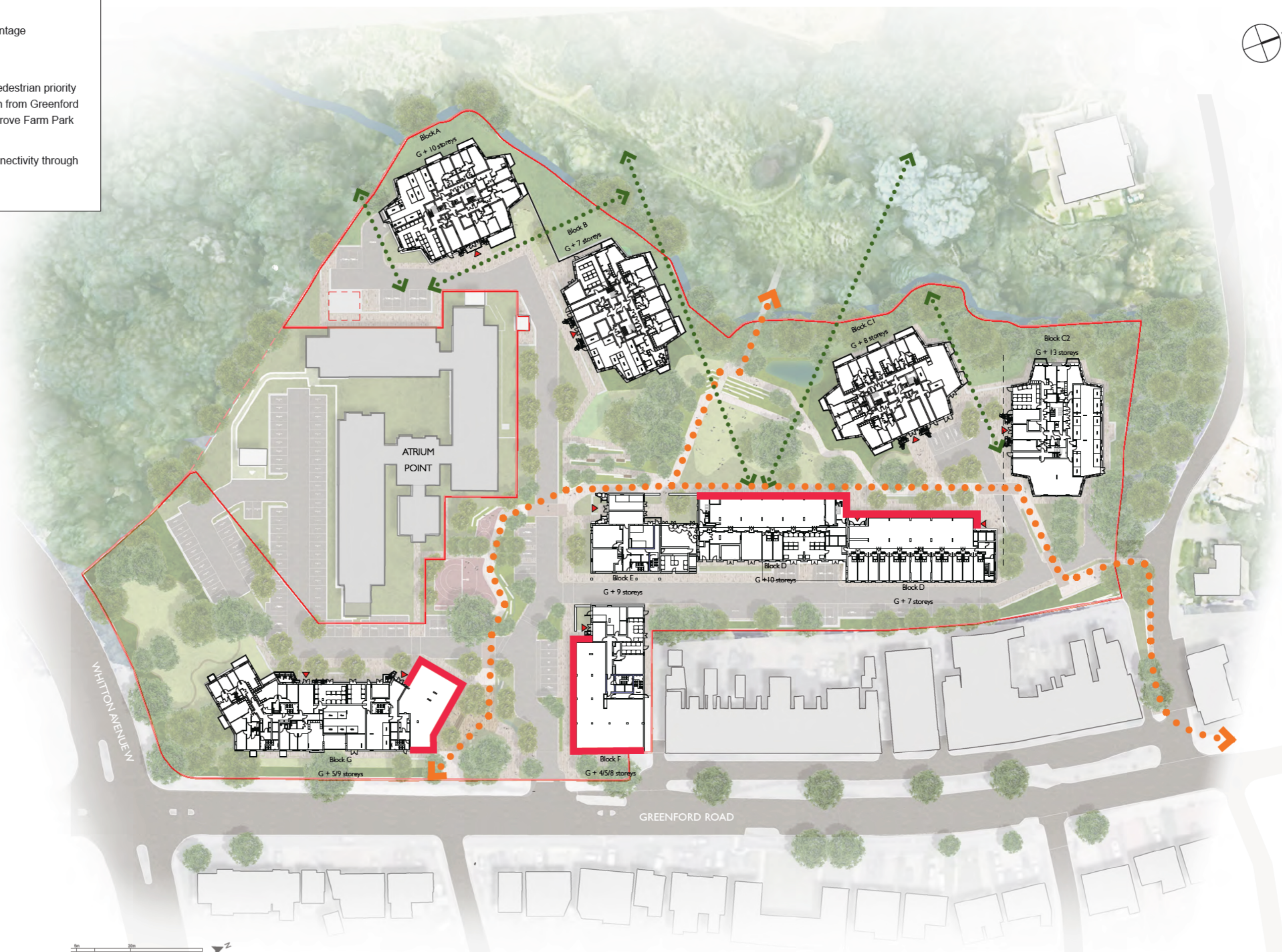
#Document issue number#

Private & confidential
Not for general circulation



Design Proposal: Site Arrangement

	Active Frontage
Connectivity	
	Primary pedestrian priority connection from Greenford Road to Grove Farm Park
	Visual connectivity through site



Typical Plans: Blocks A, B, C1 & C2

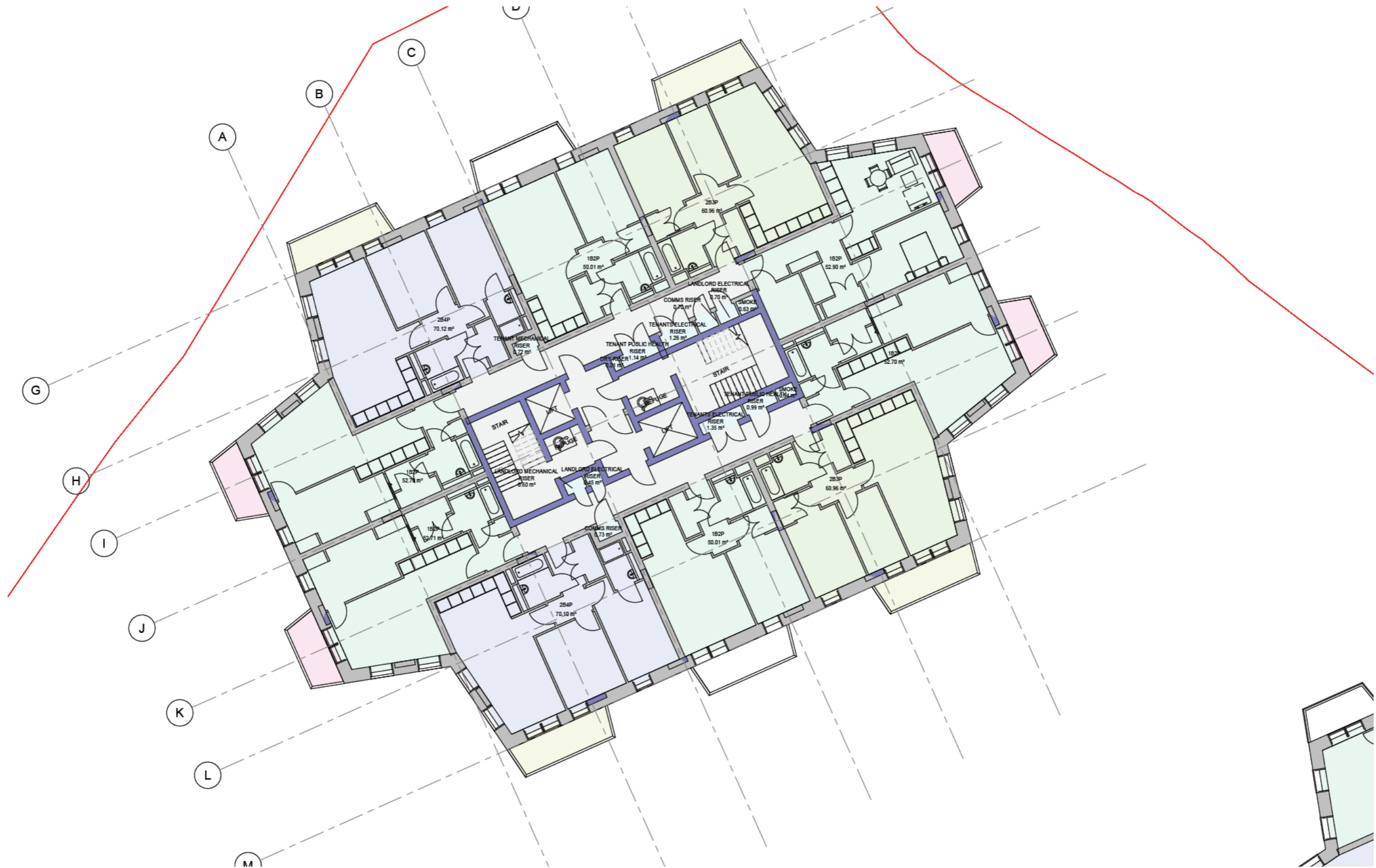
Ground Floor Plan

1:200



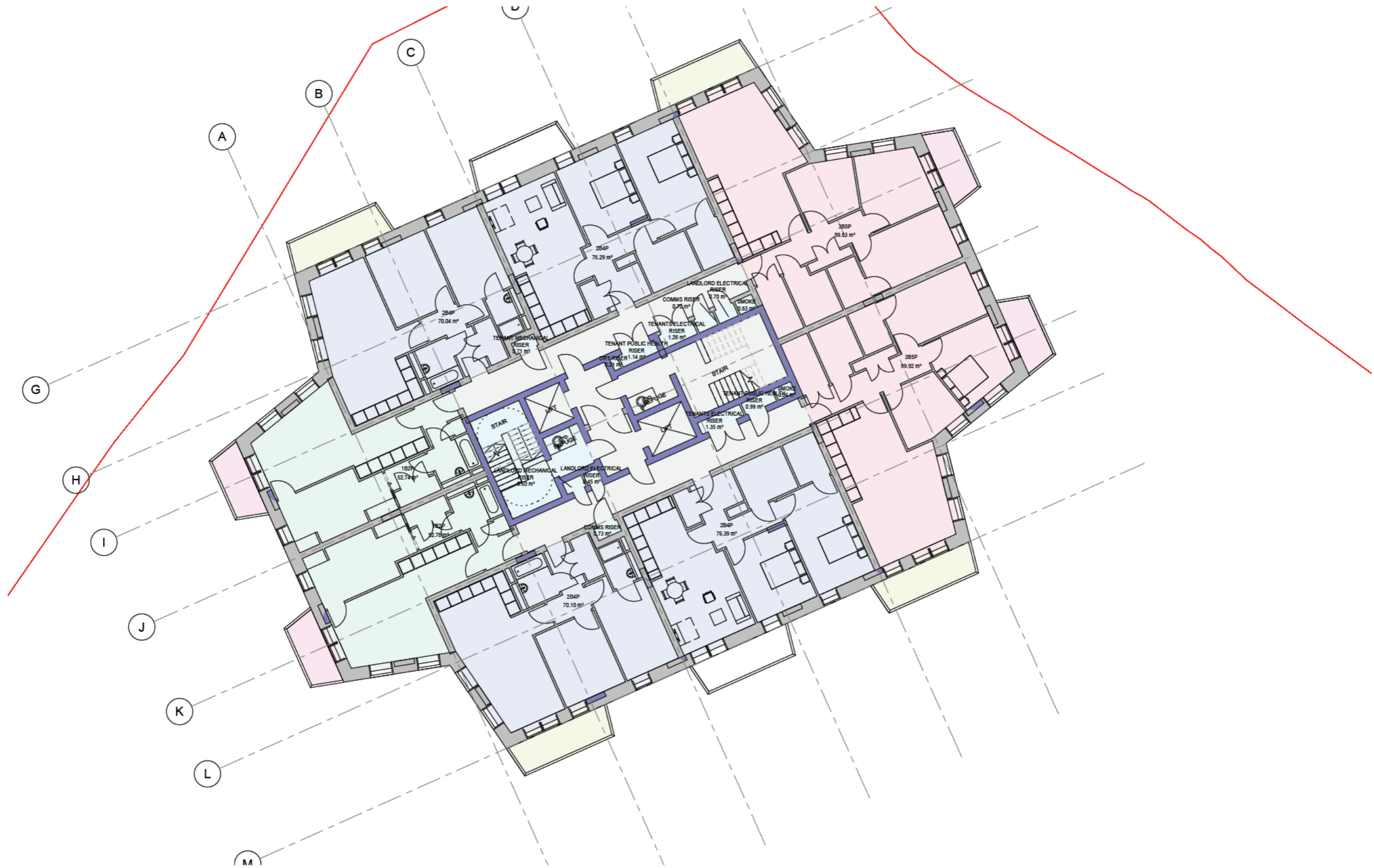
Typical Plans: Blocks A, B, C1 & C2

Typical Upper Floor Plan I
1:200



Typical Plans: Blocks A, B, C1 & C2

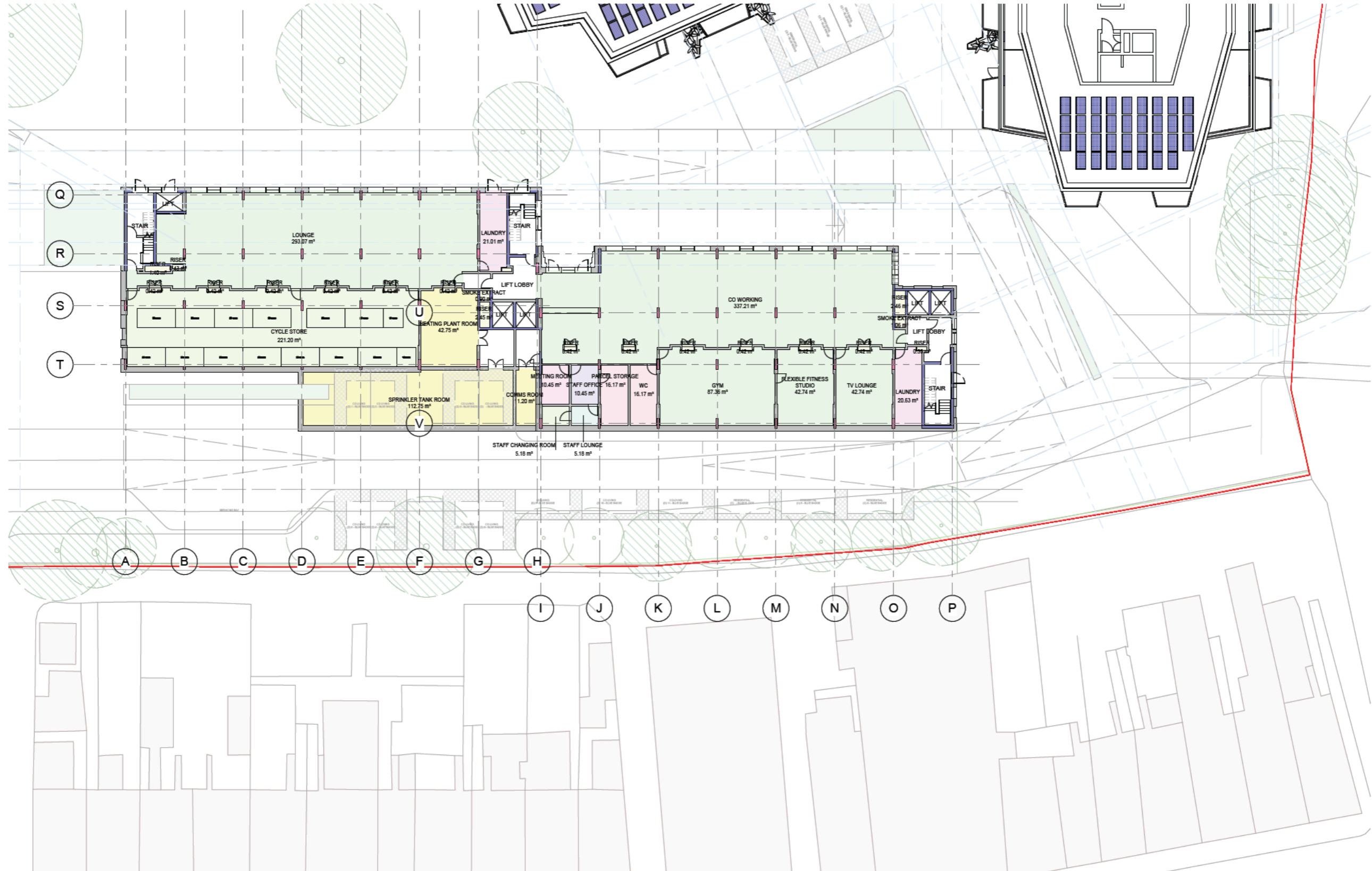
Typical Upper Floor Plan 2
1:200



Typical Plans: Block D

Ground Floor Plan

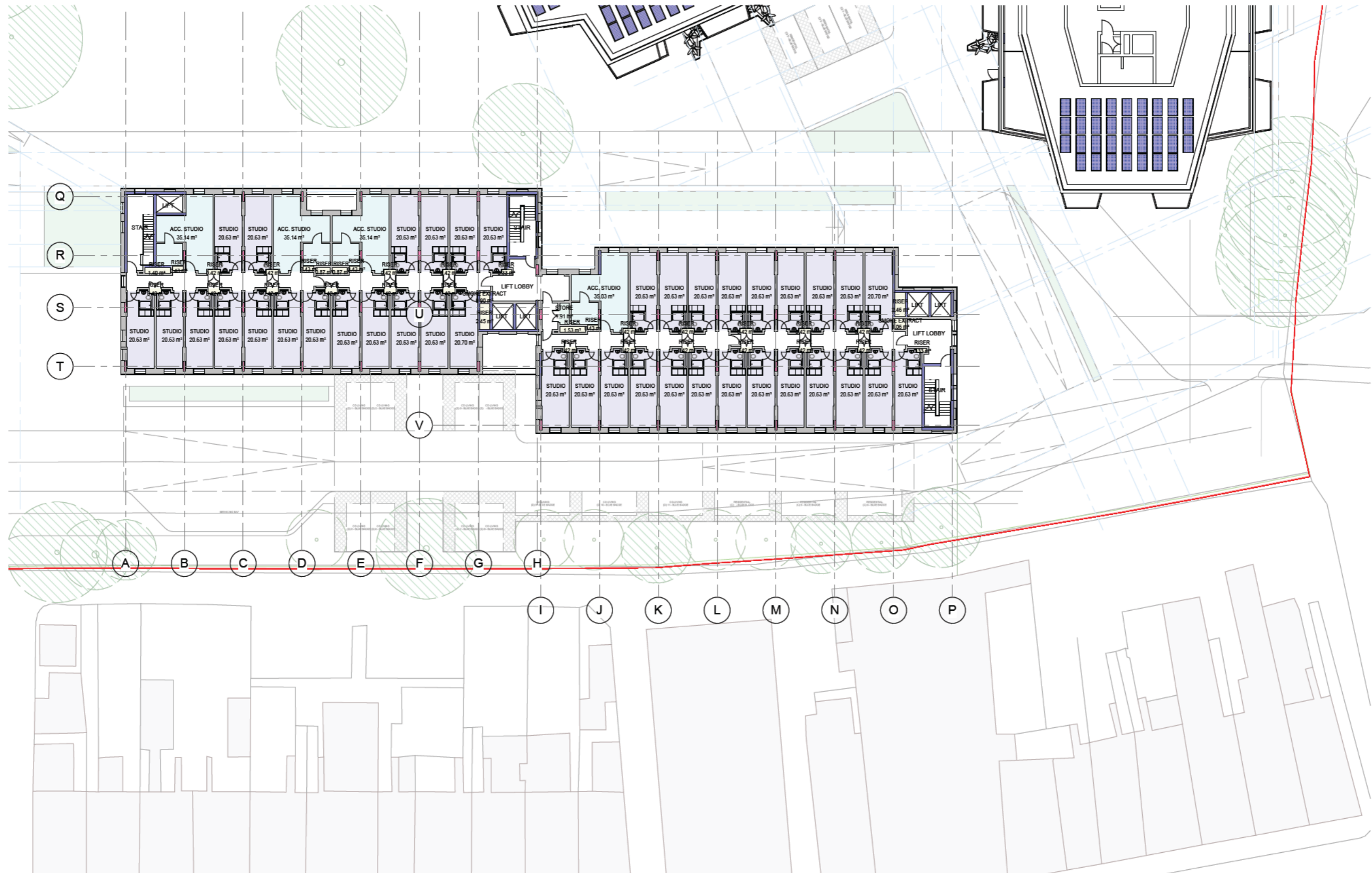
1:400



Typical Plans: Block D

Typical Upper Floor Plan

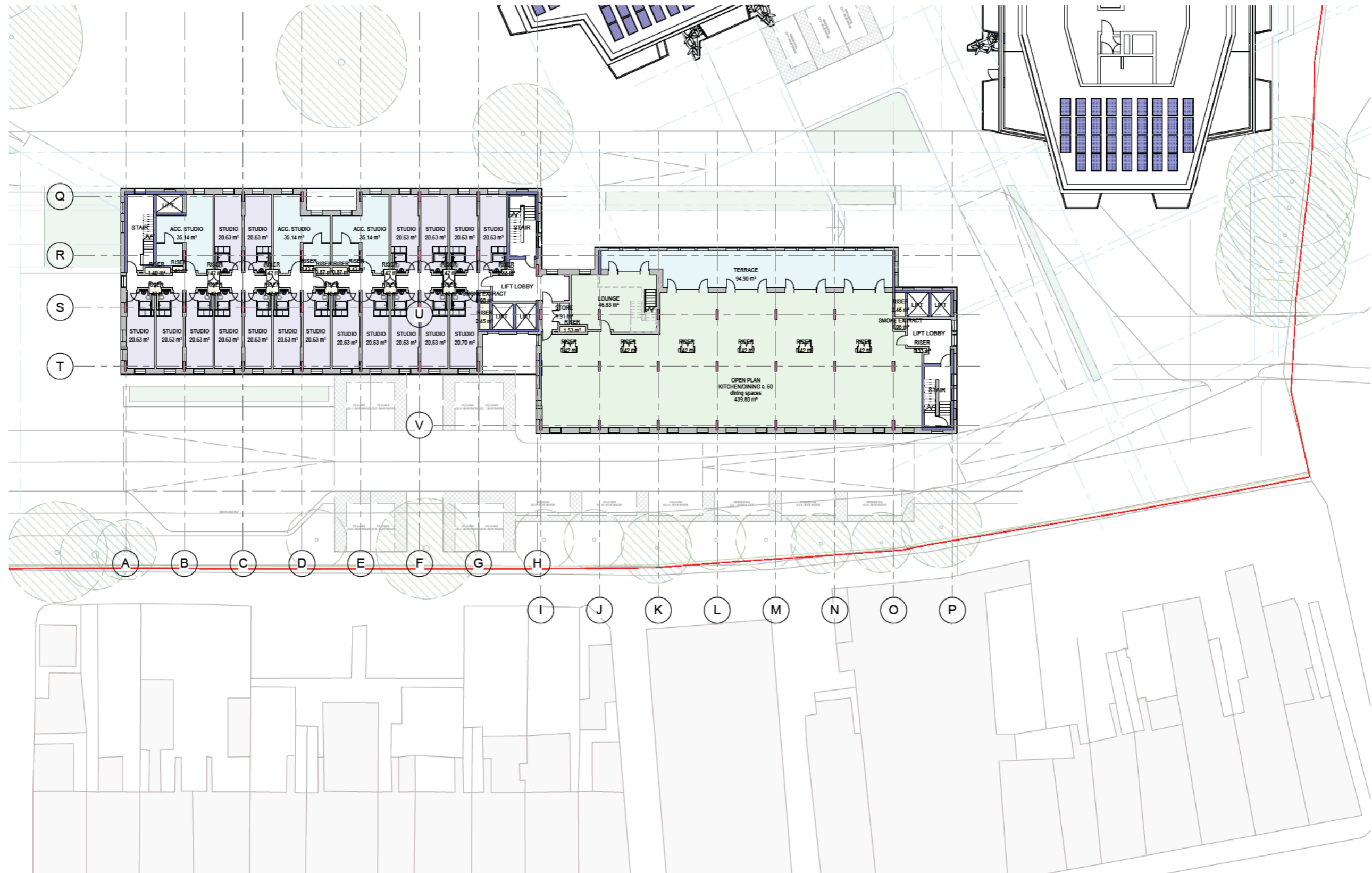
1:400



Typical Plans: Block D

Seventh Floor Plan

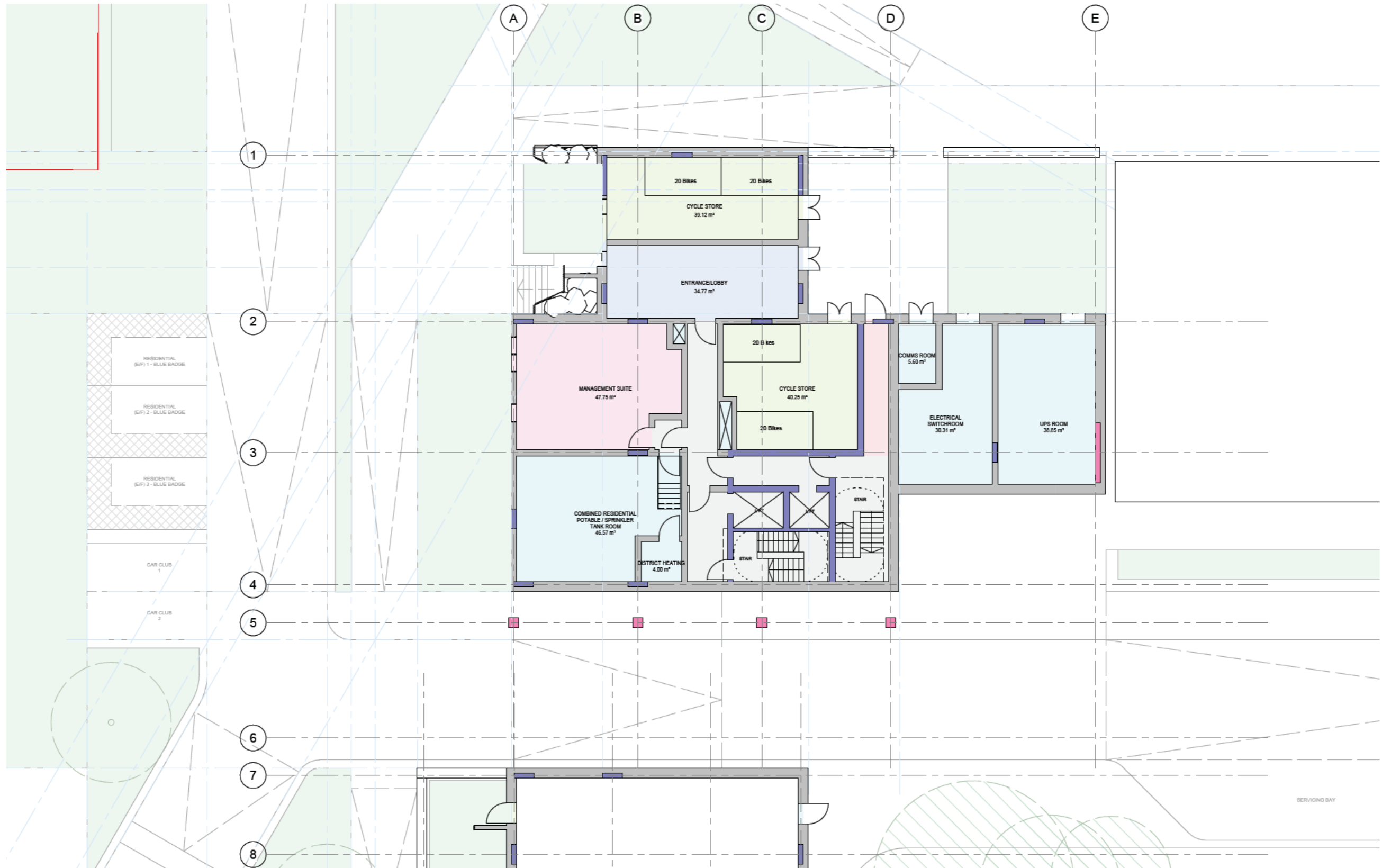
1:400



Typical Plans: Block E

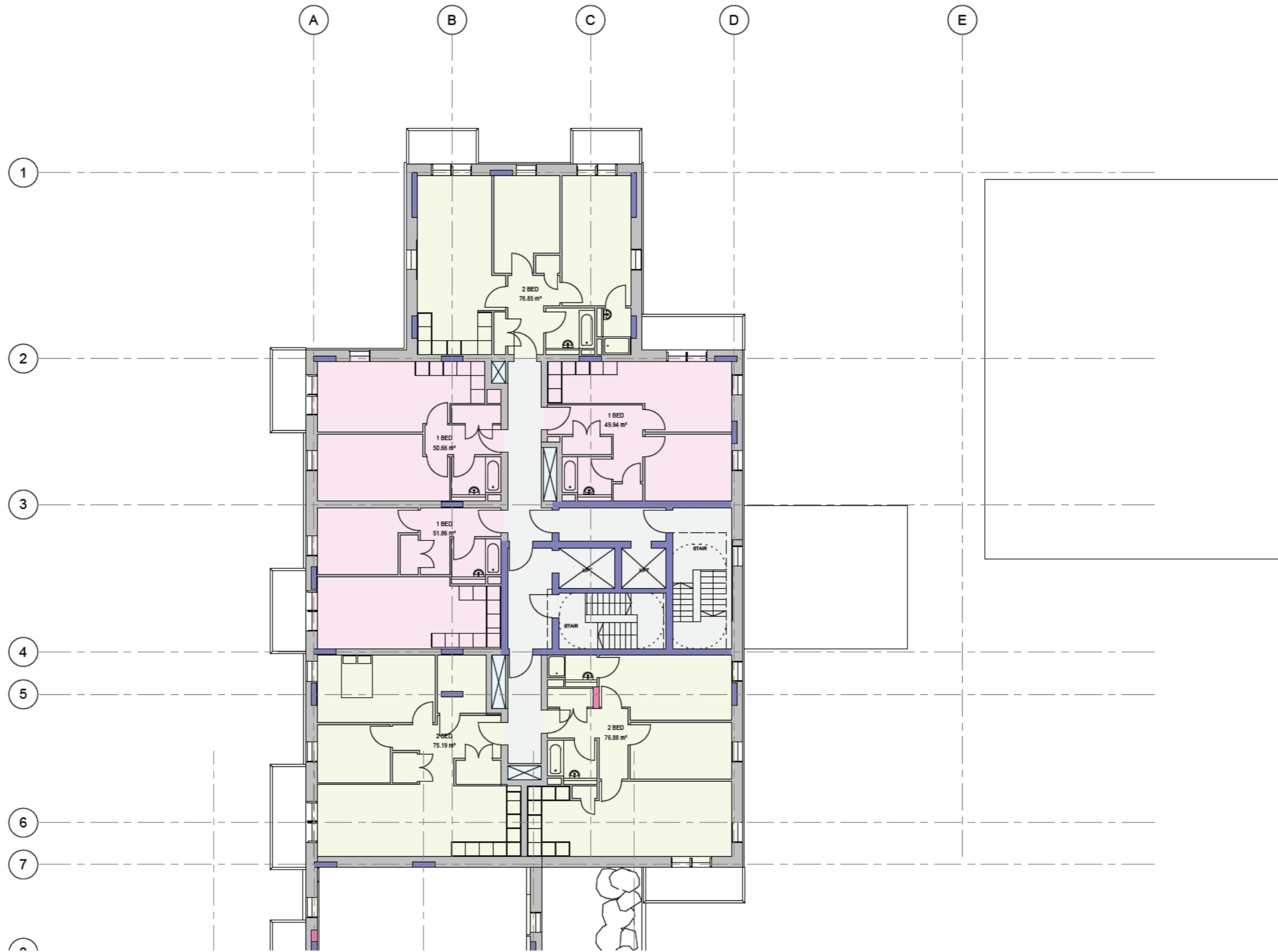
Ground Floor Plan

1:200



Typical Plans: Block E

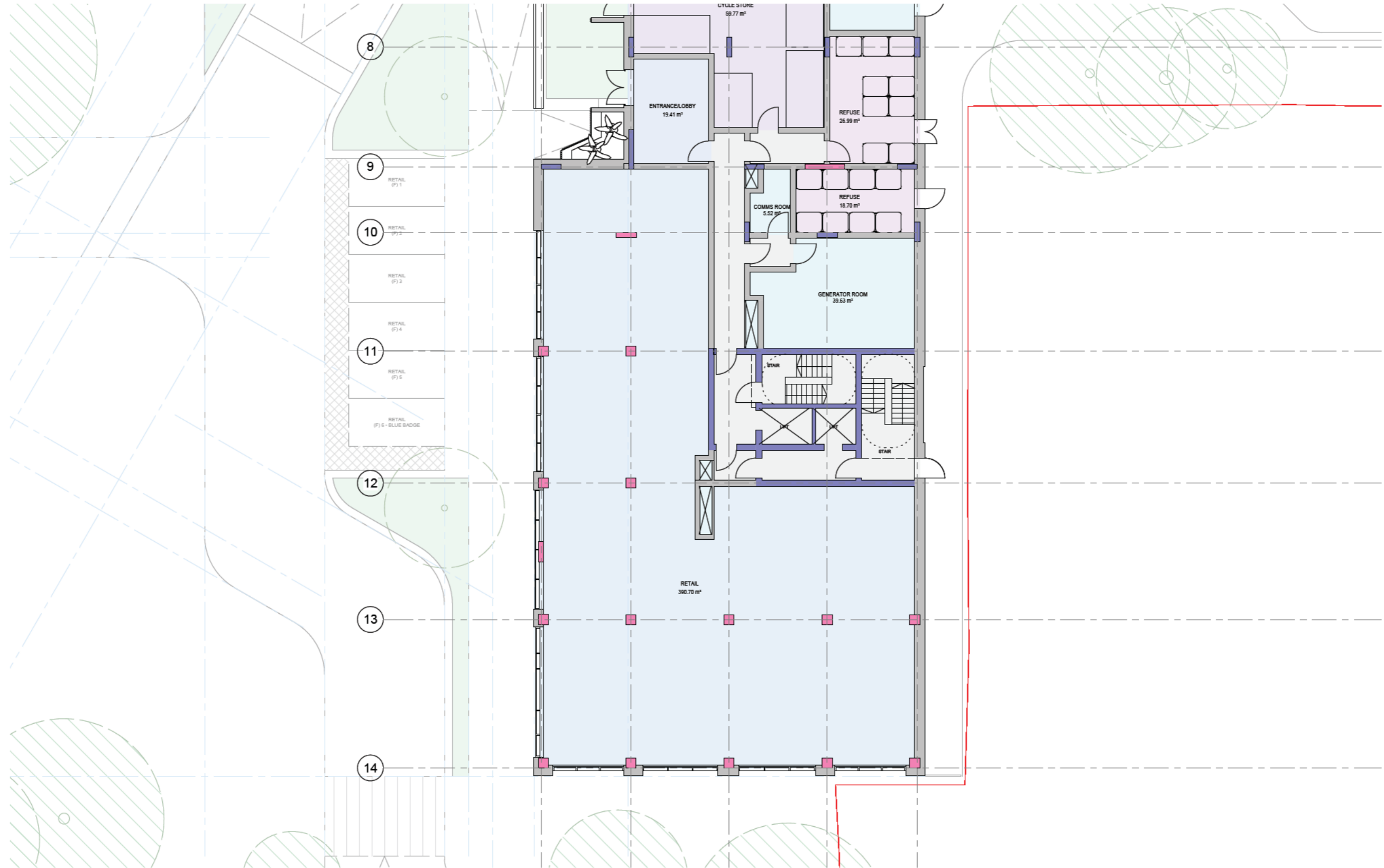
Typical Upper Floor Plan
1:200



Typical Plans: Block F

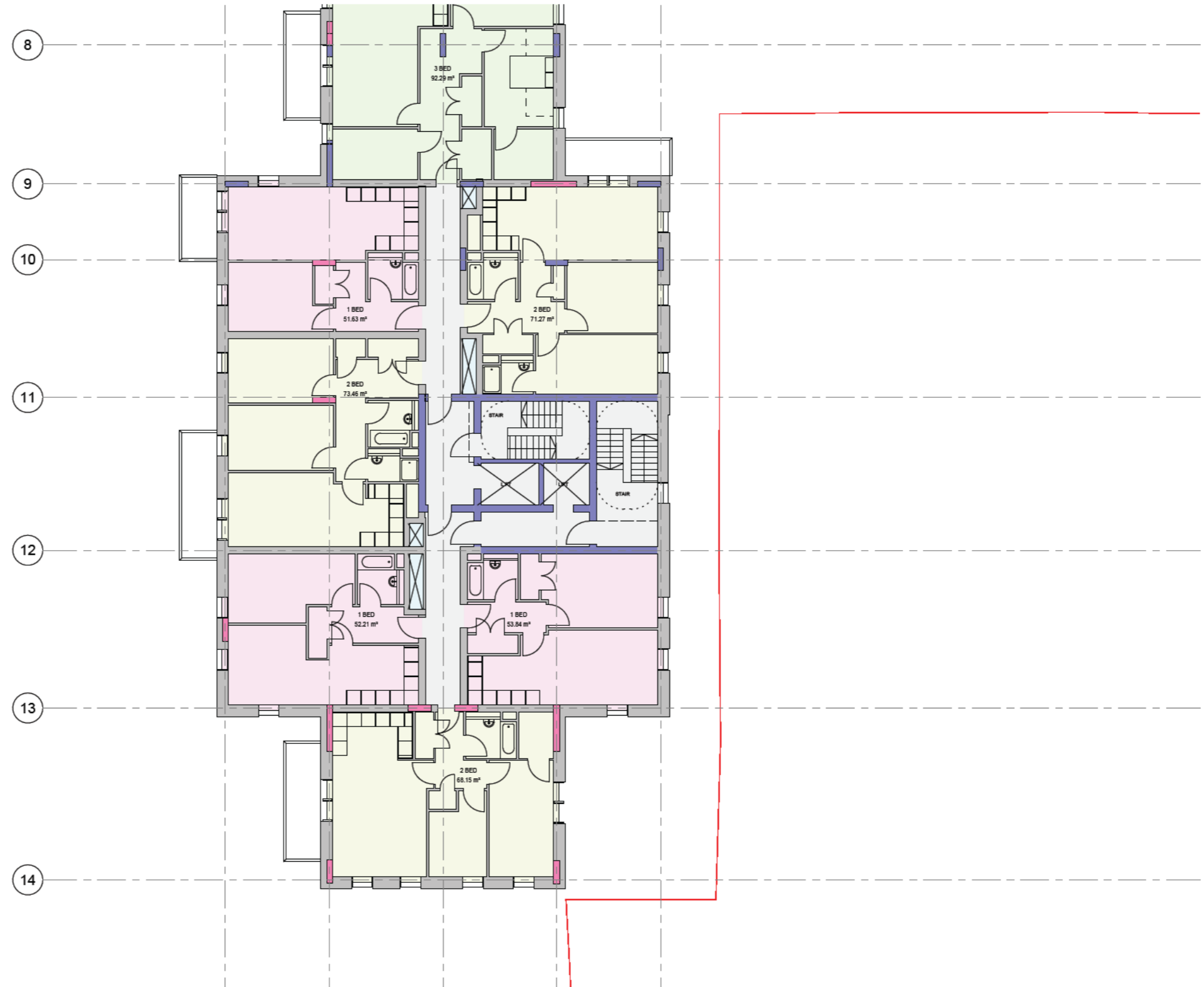
Ground Floor Plan

1:200



Typical Plans: Block F

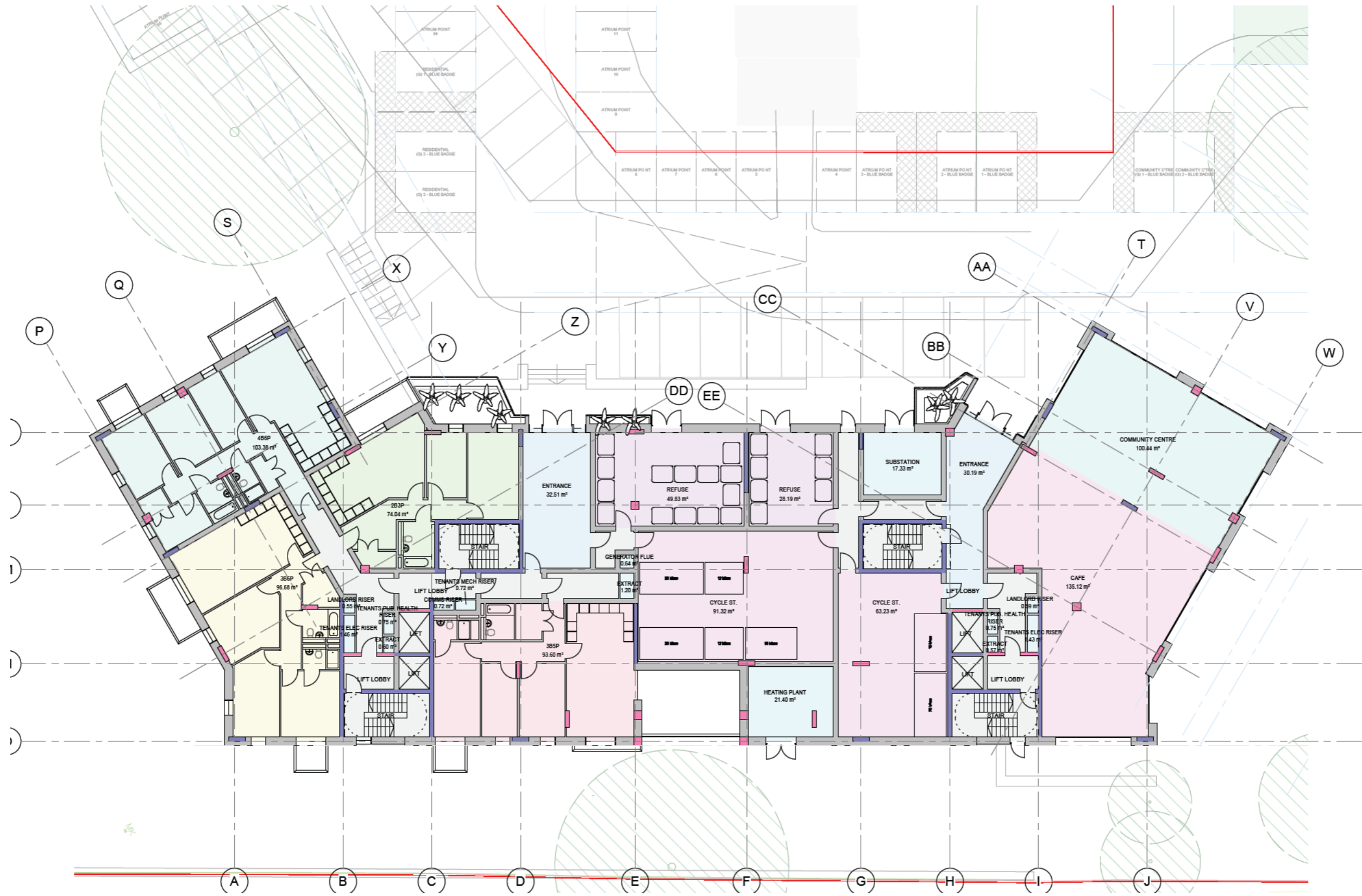
Typical Upper Floor Plan
1:200



Typical Plans: Block G

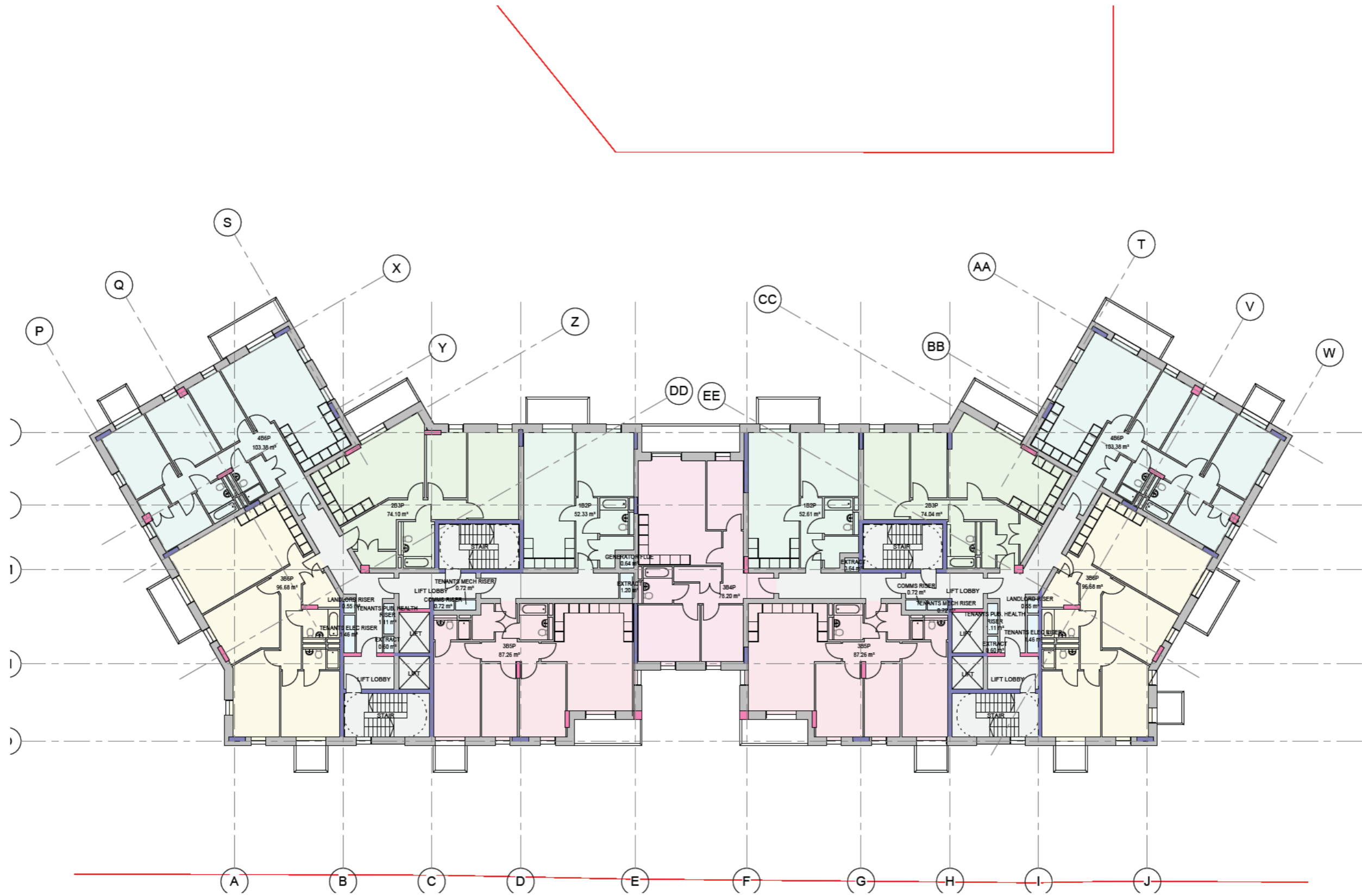
Ground Floor Plan

1:250



Typical Plans: Block G

Typical Upper Floor Plan
1:250



End of Document

tp bennett

One America Street London SE1 0NE | +44 (0)20 7208 2000
Royal Mills Unit 2B 17 Redhill Street Manchester M4 5BA | +44 (0)161 694 7700
1 City Square Infirmary Street Leeds LS1 2ES | +44 (0)113 521 2100
www.tpbenett.com

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Park View Place - GLA pre-app 2024/0766
Date: 15 September 2025 16:37:00
Attachments: [image001.png](#)
[image002.png](#)

Hi [REDACTED]
Apologies for the delayed response as I have been on leave.
Sounds like a follow-up pre-application meeting would be most suitable – please email [REDACTED]@[london.gov.uk](mailto: [REDACTED]@london.gov.uk) to arrange.

Thanks,
[REDACTED]

From: [REDACTED]
Sent: 04 September 2025 10:20
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]
Subject: RE: Park View Place - GLA pre-app 2024/0766

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Hi [REDACTED]
We would also present amendments and expect advice/comments to follow please, as we have not received a written response yet (and this is something our client would like).
Many thanks,

[REDACTED]
[REDACTED]
[REDACTED]

Turley

Mobile: +44 [REDACTED]

Office: 020 [REDACTED]

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From: [REDACTED] <[REDACTED]@[london.gov.uk](mailto: [REDACTED]@london.gov.uk)>
Sent: 21 August 2025 15:30
To: [REDACTED] <[REDACTED]@[turley.co.uk](mailto: [REDACTED]@turley.co.uk)>
Cc: [REDACTED] <[REDACTED]@[ealing.gov.uk](mailto: [REDACTED]@ealing.gov.uk)>; [REDACTED] <[REDACTED]@[ealing.gov.uk](mailto: [REDACTED]@ealing.gov.uk)>; [REDACTED] <[REDACTED]@[turley.co.uk](mailto: [REDACTED]@turley.co.uk)>; [REDACTED] <[REDACTED]@[turley.co.uk](mailto: [REDACTED]@turley.co.uk)>
Subject: RE: Park View Place - GLA pre-app 2024/0766

Hi [REDACTED]

Apologies for missing your previous email!

Thanks for the update re MOL and LBE's EIP. This is really helpful context.

In terms of follow-up discussions, would you be intending to present scheme amendments and expect advice/comments to follow? Or is it more a quick update and timeline for moving forward?

Thanks,

██████████

From: ██████████ <██████████@turley.co.uk>

Sent: 21 August 2025 13:56

To: ██████████ <██████████@london.gov.uk>

Cc: ██████████ <██████████@ealing.gov.uk>; ██████████ <██████████@ealing.gov.uk>; ██████████ <██████████@turley.co.uk>; ██████████ <██████████@turley.co.uk>

Subject: RE: Park View Place - GLA pre-app 2024/0766

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Hi ██████████

Sorry to chase, however are you able to come back on my email below regarding a follow up meeting for the above site please?

Kind regards,

██████████

██████████ ██████████

████████████████████

Turley

Mobile: +44 ██████████

Office: 020 ██████████

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From: ██████████ <██████████@turley.co.uk>

Sent: 14 August 2025 11:08

To: ██████████ <██████████@london.gov.uk>

Cc: ██████████ <██████████@ealing.gov.uk>; ██████████ <██████████@ealing.gov.uk>; ██████████ <██████████@turley.co.uk>; ██████████ <██████████@turley.co.uk>

Subject: RE: Park View Place - GLA pre-app 2024/0766

Hi ██████████

I hope you're well?

Since we last met, we have been in ongoing discussion with LB Ealing on a number of topics, including the MOL status.

Following the initial round of the emerging Local Plan EIP hearing sessions earlier this summer, including the MOL boundary changes hearing session, LB Ealing have advised they now

comfortable that significant weight can be attributed to the sites MOL de-designation as this was not challenged during the EIP hearing. However, we are continuing to have ongoing discussions on the MOL as the proposed development (as well as the extant scheme) both still encroach over the revised MOL Boundary.

Consequently, we'd be grateful for a follow up meeting with yourself and GLA colleagues to bring you up to speed on the proposals and specifically discuss the MOL status and affordable housing offer / fast-track route compliance. Do we need to submit up a formal follow up pre-app request or can we arrange this direct with yourself?

Many thanks,

[Redacted]
[Redacted]
[Redacted]

Turley

Mobile: +44 [Redacted]

Office: 020 [Redacted]

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From: [Redacted] <[Redacted]@london.gov.uk>

Sent: 03 March 2025 11:48

To: [Redacted] <[Redacted]@ealing.gov.uk>; [Redacted] <[Redacted]@turley.co.uk>

Subject: Park View Place - GLA pre-app 2024/0766

Hi [Redacted] and [Redacted]

Following on from the pre-application meeting about development at Park View place on 30/01, I'm just touching base to see whether there has been any update on confirming whether the MOL designation would be removed by the time a planning application is submitted, or even by the time a decision is made on the application?

As discussed during the meeting, it would be preferable to issue the pre-app note with a more definitive understanding of the designation/de-designation. However, if a better understanding of this position is still looking to be quite a way off do let me know so as not to unnecessarily delay issuing the note.

Thanks,

[Redacted]
[Redacted]

Senior Strategic Planner, Development Management

GREATERLONDONAUTHORITY

169 Union Street London SE1 0LL

london.gov.uk

[Redacted] [london.gov.uk](#)

My pronouns are: [Redacted]

We are London. Find out about the work of the Mayor, the London Assembly, and

From: [REDACTED]
To: [REDACTED]
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839
Date: 28 October 2025 14:51:56
Attachments: [image001.png](#)
[image002.png](#)
[image124752.png](#)
[image932859.png](#)
[Park View Place Faling - GLA 2nd Pre-application Meeting cover letter.pdf](#)
[Appendix 1 - MOL note - July 2025 plus TPB Study.pdf](#)
[Appendix 2 - MOL Correspondence.pdf](#)

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Hi [REDACTED]

Apologies for the delay with this, however please find attached our planning note setting out the planning matters we'd like to discuss, which are:

- The site's MOL status
- The proposed Affordable Housing provision and tenure split
- Principle of purpose-built shared living use
- Design Updates

As you'll appreciate the ministerial statement has changed (and simplified) the affordable housing position a lot, but took us some time to confirm the affordable housing provision following this, which has led to the delay in sending this over.

Nothing you need to know at arrival, just advise reception downstairs you are here to meet me and they should send you upstairs to our office.

We look forward to discussing tomorrow.

Many thanks,

[REDACTED]
[REDACTED]
[REDACTED]

Turley

Mobile: +44 [REDACTED]
Office: 020 [REDACTED]

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From: [REDACTED]
Sent: 21 October 2025 10:37
To: [REDACTED]; Pre-applications
Cc: [REDACTED]
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [REDACTED]

I can now confirm we could attend the pre-app in person.

It will be myself, [REDACTED] (team leader) and [REDACTED] (urban design).

I will get the meeting invitation updated with the address you previously provided. Please let me know if there's anything else we need to know for arrival.

Thanks,

[REDACTED]

From: [REDACTED]
Sent: 16 October 2025 15:59
To: [REDACTED] <[REDACTED]@turley.co.uk>; Pre-applications <[REDACTED]>
Cc: [REDACTED] <[REDACTED]@turley.co.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [REDACTED]

Thanks for being able to host. Will confirm with you next week.

Re the AH – agree I don't think a viability officer needs to attend. I can consult them internally after the meeting if beneficial.

Thanks for confirming re the existing pack. Will keep an eye out for your letter next week.

Thanks,

[REDACTED]

From: [REDACTED] <[REDACTED]@turley.co.uk>
Sent: 16 October 2025 10:47

To: [redacted] <[redacted]@london.gov.uk>; Pre-applications <[redacted]>
Cc: [redacted] <[redacted]@turley.co.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

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Hi [redacted]
Yes that fine for us to host at our office (Brownlow Yard, 12 Roger Street, WC1N 2JU) if you can confirm this works for you when your colleagues return from leave (we also have facilities for this to be hybrid).
We would like to discuss AH, but only the tenure split within the provision (and associated Fast-track compliance (appreciating this could be subject to change)) with you and we won't be submitting any viability evidence so I don't think it's necessary for your viability colleagues to attend.
For design purposes, please still refer to design pack uploaded 17/09. However, I will send through a brief planning cover letter setting out the topics we would like to discuss next week.
Many thanks,

[redacted]
[redacted]
[redacted]

Turley

Mobile: +44 [redacted]
Office: 020 [redacted]
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From: [redacted] <[redacted]@london.gov.uk>
Sent: 15 October 2025 11:14
To: [redacted] <[redacted]@turley.co.uk>; Pre-applications <[redacted]>
Cc: [redacted] <[redacted]@turley.co.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [redacted]
I won't be able to confirm with you until next week as some officers are currently on leave. If all officers can attend in person, we would need you to host as we no longer have a suitable meeting room available for the scheduled meeting. Would that work for you? In any case, I will get back to you next week – please chase me if you haven't heard anything by this time next week.
Separately, I note in a previous email you said you only need urban design officers to attend the meeting. I can see my colleague has also invited viability colleagues to this meeting, so I want to check whether you're intending to submit any viability information / wanting to discuss AH / viability?
Also, are you intending to submit an updated pre-app pack / any additional information? Or can we rely on the one uploaded 17/9?
Thanks,

[redacted]

From: [redacted] <[redacted]@turley.co.uk>
Sent: 15 October 2025 09:57
To: [redacted] <[redacted]@london.gov.uk>; Pre-applications <[redacted]>
Cc: [redacted] <[redacted]@turley.co.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

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Hi [redacted]
I hope you're well?
I just wanted to check whether it was possible for our meeting on 29th October to be in person please?
Kind regards,

[redacted]
[redacted]
[redacted]

Turley

Mobile: +44 [redacted]
Office: 020 [redacted]
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From: [REDACTED] <[REDACTED]@turley.co.uk>

Sent: 30 September 2025 16:41

To: [REDACTED] <[REDACTED]@london.gov.uk>; Pre-applications <[REDACTED]>

Cc: [REDACTED] <[REDACTED]@turley.co.uk>

Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [REDACTED]

Only urban design officers alongside planning officers will be required.

Many thanks,

[REDACTED]
[REDACTED]
[REDACTED]

Turley

Mobile: +44 [REDACTED]

Office: 020 [REDACTED]

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From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 30 September 2025 16:37

To: [REDACTED] <[REDACTED]@turley.co.uk>; Pre-applications <[REDACTED]>

Cc: [REDACTED] <[REDACTED]@turley.co.uk>

Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [REDACTED]

Yes, once the TL has done what they need to do, I'll liaise with [REDACTED] about suitable dates.

Could you confirm which of my colleagues you'd also like at the meeting – TFL, urban design, energy etc. ?

Thanks,

[REDACTED]

From: [REDACTED] <[REDACTED]@turley.co.uk>

Sent: 30 September 2025 13:52

To: Pre-applications <[REDACTED]> [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@turley.co.uk>

Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

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Hi [REDACTED]

Thanks for your help with resolving this.

@ [REDACTED] are you able to suggest some dates once you've heard back from your team leader please?

Many thanks,

[REDACTED]
[REDACTED]
[REDACTED]

Turley

Mobile: +44 [REDACTED]

Office: 020 [REDACTED]

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From: Pre-applications <[REDACTED]>
Sent: 30 September 2025 12:15
To: [REDACTED] <[REDACTED]@turley.co.uk>; Pre-applications <[REDACTED]>
<[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@turley.co.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [REDACTED]
Apologies for the delay in coming back to you.
We have requested the sales invoice that will be send to payer once issued. Please note that this can take up to 2 weeks.
Your application has been validated and a meeting will be offer once reviewed by the team leader. You will be able to have the meeting before payment, but the payment will need to be received prior issuing the pre-application advice.
Kind regards

[REDACTED]
[REDACTED]
Technical Support Officer, Planning
GREATERLONDONAUTHORITY
Union Street, London SE1 0LL
[REDACTED]
[london.gov.uk](mailto:[REDACTED]@london.gov.uk)
[REDACTED]@london.gov.uk

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Follow us on Twitter [@LDN_planning](#)

From: [REDACTED] <[REDACTED]@turley.co.uk>
Sent: 29 September 2025 16:51
To: Pre-applications <[REDACTED]> <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@turley.co.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839
Importance: High

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Hi all,

Sorry to chase, however this pre-app meeting is currently holding up the entire application submission programme for this development and is therefore becoming critical.
We note you require payment before you can offer a date, however no invoice for this pre-app fee has been issued so my client us unable to pay – can this invoice please be issued urgently?
If there is anything that can be done to allow a meeting date to be arranged in the interim that would be greatly appreciated.
Many thanks,

[REDACTED]
[REDACTED]
Turley
Mobile: +44 [REDACTED]
Office: 020 [REDACTED]
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From: [REDACTED] <[REDACTED]@turley.co.uk>
Sent: 23 September 2025 16:25
To: Pre-applications <[REDACTED]> <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@turley.co.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [REDACTED]
Can you please provide an invoice ASAP for my client to pay if one has not yet been issued please?
@ [REDACTED] – given we did not receive written pre-app advice, which was paid for, from the first pre-app is it possible to get a meeting in the diary prior to the fee for this meeting being paid please?
This meeting is currently critical for our programme leading to a planning application submission at end of November.

Kind regards,
[REDACTED]
[REDACTED]

Turley

Mobile: +44 [REDACTED]

Office: 020 [REDACTED]

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From: Pre-applications <[REDACTED]>

Sent: 17 September 2025 15:01

To: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@turley.co.uk>; Pre-applications <Pre-applications@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@turley.co.uk>

Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [REDACTED]

Your application is currently invalid and is awaiting payment. We will be able to have a look at officers' availability and propose you a meeting date once your application is valid.

Kind regards

[REDACTED]

[REDACTED]

Technical Support Officer, Planning

GREATERLONDONAUTHORITY

Union Street, London SE1 0LL

[REDACTED]

london.gov.uk

[REDACTED] [london.gov.uk](#)

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From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 17 September 2025 14:11

To: [REDACTED] <[REDACTED]@turley.co.uk>; Pre-applications <[REDACTED]>

Cc: [REDACTED] <[REDACTED]@turley.co.uk>

Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [REDACTED]

Thanks for this. [REDACTED] and his team will review diaries and send out a meeting request – keep an eye out.

Thanks,

[REDACTED]

From: [REDACTED] <[REDACTED]@turley.co.uk>

Sent: 17 September 2025 12:52

To: Pre-applications <[REDACTED]@turley.co.uk>; [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@turley.co.uk>

Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

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Thanks [REDACTED]

This has now been submitted with reference 2025/0839. @ [REDACTED] are we able to now get a date in the diary for a meeting please?

Many thanks,

[REDACTED]

[REDACTED]

[REDACTED]

Turley

Mobile: +44 [REDACTED]

Office: 020 [REDACTED]

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From: Pre-applications <[REDACTED]>
Sent: 17 September 2025 12:45
To: [REDACTED] <[REDACTED]@turley.co.uk>; Pre-applications <[REDACTED]>
Cc: [REDACTED] <[REDACTED]@turley.co.uk>; [REDACTED] <[REDACTED]@london.gov.uk>
Subject: Re: 2024/0766 - Follow up pre-app - Park View Place

Good afternoon [REDACTED]

Please submit the Level 2 Follow Up meeting by following the instructions through this link:

<https://www.london.gov.uk/programmes-strategies/planning/planning-applications-and-decisions/pre-planning-application-meeting-service>

Kind regards,

[REDACTED]
[REDACTED]
Planning Data and Performance Officer
GREATERLONDONAUTHORITY
Union Street, London SE1 0LL
[london.gov.uk](mailto:[REDACTED]@london.gov.uk)
[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

From: [REDACTED] <[REDACTED]@turley.co.uk>
Sent: 17 September 2025 10:44
To: Planning Support <[REDACTED]>
Cc: [REDACTED] <[REDACTED]@turley.co.uk>; [REDACTED] <[REDACTED]@london.gov.uk>
Subject: 2024/0766 - Follow up pre-app - Park View Place

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Good morning,

Further to the below, could we please arrange a follow up pre-app meeting for 2024/0766 for the proposed Development at Park View Place.

Could you please confirm what you require to get a meeting date in the diary please?

Many thanks,

[REDACTED]

[REDACTED]
[REDACTED]

Turley

Mobile: +44 [REDACTED]
Office: 020 [REDACTED]
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From: [REDACTED] <[REDACTED]@turley.co.uk>
Sent: 15 September 2025 16:37
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]
Subject: RE: Park View Place - GLA pre-app 2024/0766

Hi [REDACTED]

Apologies for the delayed response [REDACTED]

Sounds like a follow-up pre-application meeting would be most suitable – please email [REDACTED] to arrange.

Thanks,

[REDACTED]

From: [REDACTED] <[REDACTED]@turley.co.uk>
Sent: 04 September 2025 10:20
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@turley.co.uk>; [REDACTED] <[REDACTED]@turley.co.uk>
Subject: RE: Park View Place - GLA pre-app 2024/0766

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Hi [REDACTED]

We would also present amendments and expect advice/comments to follow please, as we have not received a written response yet (and this is something our client would like).

Many thanks,

[REDACTED]

[REDACTED]

Turley

Mobile: +44 [REDACTED]

Office: 020 [REDACTED]

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From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 21 August 2025 15:30

To: [REDACTED] <[REDACTED]@turley.co.uk>

Cc: [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED]

<[REDACTED]@turley.co.uk>; [REDACTED] <[REDACTED]@turley.co.uk>

Subject: RE: Park View Place - GLA pre-app 2024/0766

Hi [REDACTED]

Apologies for missing your previous email!

Thanks for the update re MOL and LBE's EIP. This is really helpful context.

In terms of follow-up discussions, would you be intending to present scheme amendments and expect advice/comments to follow? Or is it more a quick update and timeline for moving forward?

Thanks,

[REDACTED]

From: [REDACTED] <[REDACTED]@turley.co.uk>

Sent: 21 August 2025 13:56

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED]

<[REDACTED]@turley.co.uk>; [REDACTED] <[REDACTED]@turley.co.uk>

Subject: RE: Park View Place - GLA pre-app 2024/0766

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Hi [REDACTED]

Sorry to chase, however are you able to come back on my email below regarding a follow up meeting for the above site please?

Kind regards,

[REDACTED]

[REDACTED]

Turley

Mobile: +44 [REDACTED]

Office: 020 [REDACTED]

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From: [redacted] <[redacted]@turley.co.uk>
Sent: 14 August 2025 11:08
To: [redacted] <[redacted]@london.gov.uk>
Cc: [redacted] <[redacted]@ealing.gov.uk>; [redacted] <[redacted]@ealing.gov.uk>; [redacted] <[redacted]@turley.co.uk>; [redacted] <[redacted]@turley.co.uk>
Subject: RE: Park View Place - GLA pre-app 2024/0766

Hi [redacted]

I hope you're well?

Since we last met, we have been in ongoing discussion with LB Ealing on a number of topics, including the MOL status.

Following the initial round of the emerging Local Plan EIP hearing sessions earlier this summer, including the MOL boundary changes hearing session, LB Ealing have advised they now comfortable that significant weight can be attributed to the sites MOL de-designation as this was not challenged during the EIP hearing. However, we are continuing to have ongoing discussions on the MOL as the proposed development (as well as the extant scheme) both still encroach over the revised MOL Boundary.

Consequently, we'd be grateful for a follow up meeting with yourself and GLA colleagues to bring you up to speed on the proposals and specifically discuss the MOL status and affordable housing offer / fast-track route compliance. Do we need to submit up a formal follow up pre-app request or can we arrange this direct with yourself?

Many thanks,

[redacted]

[redacted]

Turley

Mobile: +44 [redacted]

Office: 020 [redacted]

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From: [redacted] <[redacted]@london.gov.uk>
Sent: 03 March 2025 11:48
To: [redacted] <[redacted]@ealing.gov.uk>; [redacted] <[redacted]@turley.co.uk>
Subject: Park View Place - GLA pre-app 2024/0766

Hi [redacted] and [redacted]

Following on from the pre-application meeting about development at Park View place on 30/01, I'm just touching base to see whether there has been any update on confirming whether the MOL designation would be removed by the time a planning application is submitted, or even by the time a decision is made on the application?

As discussed during the meeting, it would be preferable to issue the pre-app note with a more definitive understanding of the designation/de-designation. However, if a better understanding of this position is still looking to be quite a way off do let me know so as not to unnecessarily delay issuing the note.

Thanks,

[redacted]

[redacted]

Senior Strategic Planner, Development Management

Greater London Authority
169 Union Street London SE1 0LL

[london.gov.uk](https://www.london.gov.uk)

[redacted]@london.gov.uk

My pronouns are: [redacted]

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<https://www.london.gov.uk/>

27 October 2025

Delivered by email

Our ref: **INTL3003**

■■■■■■■■■■ ■■■■■■■■■■
Strategic Planning Applications
Development Management
Greater London Authority
City Hall
More London Riverside
London
SE1 2AA

Dear ■■■■■■■■■■

PARK VIEW PLACE, GREENFORD ROAD, SUDBURY HILL, UB6 0JA - LB EALING

GLA PRE-APPLICATION FOLLOW UP MEETING SUBMISSION

This letter has been prepared to support a follow up pre-application submission made on behalf of Interland Group with respect to their site at Park View Place, Greenford Road, Sudbury Hill, UB6 0JA (“the site”). An initial pre-application meeting for the site was held on 30th January 2025 (ref. 2024/0766). No advice was received following this as further information on the site’s MOL status was requested from the LPA.

An important update since the last pre-application meeting is that Weston Homes have joined the applicant team as a delivery partner for the development. Should planning permission be granted Weston Homes will deliver the C3 residential blocks, with Interland Group developing the co-living block.

Subject to agreement on a few final elements of the proposed development, set out within this letter, an application is ready for submission within three months, with delivery already lined up should planning permission be granted to enable quick construction of the proposed homes.

This follow up meeting has been principally been requested to discuss:

- (i) The site’s MOL status
- (ii) The proposed Affordable Housing provision and tenure split

Brownlow Yard
12 Roger Street
London
WC1N 2JU

T 020 ■■■■■■■■■■ turley.co.uk

- (iii) Principle of purpose-built shared living use
- (iv) Design Updates

This covering letter provides further information for discussion on points (i), (ii) and (iii) above.

The Site's MOL Status

As discussed within the last meeting, the site is currently within adopted Metropolitan Open Land, however Ealing's emerging Local Plan seeks to de-designate the site as MOL. At the meeting you (the GLA) requested confirmation from LB Ealing that they would treat the application as de-designated.

Since that meeting, the Local Plan Examination Hearing Session on MOL boundary changes was held on Tuesday 17th June. The de-designation of the site, through the change in boundary of the MOL2 designation, was not challenged during examination, and following this LB Ealing have confirmed that they can attribute significant weight to the site's de-designation as MOL and as such would not treat an application coming forward as MOL.

However, it was then established that the development still clipped the revised MOL Boundary with a small corner of 3 block's (A, B & C) being located within the revised MOL. We had been advised that the revised boundary had been selected by Ealing's policy team as this was the boundary of development under the previous scheme, however we have undertaken a study which also demonstrates that the implemented extant permission for the sites redevelopment also encroaches over the revised boundary.

From a review of the emerging Local Plan evidence base, we also understand the justification for revising the MOL boundary was to remove the Kellog Tower Site, however the boundary selected does not remove the full site.

Full details of this are set out within Appendix 1, which is a briefing note prepared to assist discussion with LB Ealing and requested that the that either the MOL Boundary is revised to remove the whole site under Main Modifications of the emerging Local Plan Process, or that it is confirmed that the proposed development will not be classified as being within the MOL due to 3 blocks clipping the boundary.

Following this Ealing's Strategic Planning Manager accepted that this was a procedural error, however they advised that it is too late to make changes to proposed MOL boundaries due to the advanced stage in the examination process, but this *'should not impede delivery of your proposed scheme'*. They also advised that this could be revised when the Local Plan undergoes an almost immediate review post adoption. We have subsequently sought explicit confirmation that that the proposals wouldn't be classed as MOL development, and were advised Ealing would *'in principle but only if this reflects the actual reality on the ground as de facto circumstances have changed'*. This correspondence is contained at Appendix 2.

The site being treated as MOL would have significant implications to the delivery of the development. Should the site be classed as MOL, as required by Paragraph 156 and 157 of the NPPF the development would not be eligible for the Fast-track route and the affordable housing requirement for the site would be 50%, to be assessed utilising site-specific viability assessment. The site would also therefore be subject to a late-stage review.

Due to Weston Homes delivery and funding model, a late-stage review would not work and as such, should the site be treated as MOL and a late-stage review be required then this development would not come forward.

We do not consider that the 3 blocks clipping the revised MOL boundary (placed in an incorrect location) should result in the site be treated as MOL, and are looking for the GLA to support this view through these pre-application discussions and allow the development to come forward.

Affordable Housing

Following the 'Homes for London: A Package of Support for Housebuilding in the Capital' Ministerial Statement issued it is understood the following fast-track requirements now apply to the site:

- For the C3 Residential Accommodation: 20% affordable housing, with a 60:40 tenure split in favour of social rent
- For the PBSL Accommodation: 35% equivalency based on NIA (as this is excluded from the Time-limited planning route (Paragraph 19)), with a 70:30 tenure split in favour of social rent (in line with Ealing's emerging Local Plan tenure split)

It is intended to meet these requirements in full, with initial assessments suggesting this can be met with site wide a 63:37 tenure split in favour of social rent (with the intermediate proposed as Shared ownership). This would include all social rent units provided in Blocks F and G, which are both under 30m in height, and therefore can be delivered early without the need for Gateway 2 Approval. A detailed accommodation schedule demonstrating this will be presented at the meeting.

To note this reduction in the fast-track threshold does allow Interland Gorup and Weston Homes certainty to deliver a more favourable/affordable tenure split within the affordable housing proposed.

Following the ministerial statement, there are a few follow up queries we would like to discuss / get confirmation on with the GLA:

- Paragraph 19 of the Ministerial Statement excludes sites released from Grey or Green Belt, but this does not exclude sites released from MOL. Can you confirm that sites released from the MOL benefit from the time-limited planning route?
- Also noting Paragraph 19 of the Ministerial Statement; as the sites main use within the development is C3 residential not co-living (Co-living is 19.5% by NIA, therefore less than a fifth of the total site area) does the 20% fast-track threshold actually apply across all tenures (i.e. not just the residential)?
- Is the requirement to meet 35% Affordable housing by NIA across both tenures now dropped following the Ministerial Statement?
- Is the provision of the intermediate tenure within the affordable housing as shared ownership acceptable?

Principle of Purpose-Built Shared Living Accommodation

Through further discussions with LB Ealing we understand that the suitability of the site for Purpose Built Shared Living Accommodation has been questioned on the basis that the emerging Ealing Local Plan's local variation of Policy H16 states that PBSL will only be permitted within Ealing Metropolitan Town Centre.

London Plan Policy H16 states that PBSL is acceptable in locations that are well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to

car dependency. Furthermore, the policy stipulates PBSL must contribute towards mixed and inclusive neighbourhoods.

The site is located in an area of PTAL 3/4, meaning it has high public transport accessibility and is located adjacent directly adjacent to the Sudbury Hill Neighbourhood centre, and consequently in close proximity to a number of local facilities and services.

The emerging Local Plan's local variation of Policy H16 also states that PBSL must not compromise the supply of class C3 self-contained homes as part of a mix of uses, within the current proposals PBSL can be delivered as a mix of uses at the site without significantly affecting the total provision of consented C3 residential units at the site, whilst achieving an increased delivery of affordable housing.

In addition, as part of a mix of uses alongside C3 self-contained units (including affordable housing), the inclusion of PBSL in the site would ensure a truly mixed and inclusive neighbourhoods with a range of housing typologies and tenures providing the local community a range of housing choice. Furthermore, it provides the opportunity for PBSL residents to stay within the local area, and indeed specifically the site, should they decide to progress to a larger home.

Due to the unique economic circumstances surrounding PBSL, the inclusion of the use is fundamental to the viability of creating a fully inclusive and mixed housing community, and as such the delivery of the development of the site as a whole. Consequently, its inclusion underpins the delivery of the residential uses at the site, including a significant contribution to affordable housing.

Furthermore, there will be a bespoke occupier for the PBSL accommodation (i.e. a specific PBSL provider), and the use does not compete (in terms of market absorption / sales etc) with conventional C3 residential use, meaning the inclusion of the use at the site de-risks the development as a whole and includes multiple development 'exit routes' with the development.

This also ensures it can be built and delivered alongside the C3 residential units and its inclusion therefore ultimately speeds up delivery of the C3 self-contained homes, including affordable housing, as well as the entire site and aids the contribution to the Borough's housing need faster.

This is recognised in Paragraph 71 of the NPPF (2024) which states:

"Mixed tenure sites can provide a range of benefits, including creating diverse communities and supporting timely build out rates, and local planning authorities should support their development through their policies and decisions."

Consequently, it is considered that the inclusion of PBSL as part of a mix of residential uses is considered acceptable on the basis it ensures the redevelopment of the site is deliverable, suitable, available and economically viable (in line with the definition of deliverable housing sites set out in NPPF Paragraph 72 and its Glossary).

We are therefore seeking the GLA's support of the co-living accommodation as a small proportion (less than 20%) of residential uses at the site through this follow up pre-application meeting.

Conclusion

To summarise, the main points for clarification that is sought through this follow up pre-application meeting is:

- Confirmation the site would not be treated as MOL.
- Confirmation that sites released from the MOL benefit from the time-limited planning route set out within the Ministerial Statement.
- Confirmation whether the Ministerial Statement time-limited planning route fast-track threshold applies to all proposed tenures seen as the sites main use within the development is C3 residential not co-living
- Confirmation whether the requirement to meet 35% Affordable housing by NIA across both tenures now dropped following the Ministerial Statement?
- Confirmation whether the provision of the intermediate tenure within the affordable housing as shared ownership acceptable?
- Support regarding the inclusion of Purpose-Built Shared Living Accommodation as a small proportion of residential uses at the site

The emerging proposals represent a hugely exciting opportunity for Interland Group and Weston Homes to deliver a sustainable future housing development at an appropriate, brownfield site that can deliver a strategic contribution to the Borough's Housing Need, whilst also ensuring a range of residential uses, in a truly mixed and balanced community, which can ensure delivery of the site and its associated public benefits.

Yours sincerely,



 [turley.co.uk](mailto: [redacted]@turley.co.uk)

Appendix 1 – MOL Briefing Note

Appendix 2 – MOL Correspondence

Note

Park View Place, Sudbury Hill – MOL & Affordable Housing

July 2025

1. Following our pre-application meeting on 8th July 2025, where it was confirmed LB Ealing can give significant weight the Park View Place site's de-designation as MOL through the emerging Local Plan. It was also explained that the Policy Team advised the revised boundary was established in its proposed location as this was the boundary of development under the previous scheme.
2. This note sets out further analysis of the revised MOL boundary and any justification for its revised position.

Review of Evidence Base Justification for revised Boundary

Ealing Green Belt and Metropolitan Open Land Review – Stage 1

3. The Stage 1 MOL Review, as part of the Local Plan evidence Base, sets out the following regarding the site:

MOL2 - Former Kellogg Tower / Grove Farm / Ealing Northern Sports Centre

MOL assessment: The site does not score well against any of the MOL criteria. It is fragmented, with the character of the site changing considerably from one end to the other. The eastern part of the site has substantial residential development. The western part of the site (Ealing Northern Sports Centre) is not in use and is currently inaccessible, with evidence of fly-tipping. In the central part of the site, there is a David Lloyd gym which constitutes a significant built development with substantial areas of hardstanding. Grove farm on the southern part of the site is the only part of the site that resembles MOL but it is relatively small by itself, and it does not score highly against MOL criteria.

Boundary changes: *De-designate the whole site.*

Consider enhancements as part of Stage 2: *Yes, in particular make better use of the western part of the site (Ealing Northern Sports Centre)*

4. At Stage 1, it was therefore proposed to fully remove the full MOL designation (however this was not progressed following Reg. 18 Consultation)

Ealing Green Belt and Metropolitan Open Land Review – Stage 2

5. The Stage 2 Review then doesn't include any explicit reference to the site, however it is assessed under the non-development sites' section, which explains the boundary changes for these sites.
6. This states:

Boundary corrections – non-development sites

The boundary adjustments to ensure the borough’s Green Belt and MOL sites have correct, up-to-date, and defensible boundaries are presented in the ‘Atlas of Change’ document that accompanies the new Local Plan. These boundary adjustments, which reflect the current reality and use of sites, are important as sites having wrong or inconsistent policy designations can undermine the council’s ability to protect them.

The exceptional circumstances for the proposed boundary corrections are that several changes to the character and use of these sites have taken place since they were originally designated several decades ago. This is in line with the Gallagher Homes case discussed earlier which noted that “something must have occurred subsequent to the definition of the Green Belt boundary that justifies a change.”.

Wrong and inconsistent policy designations that do not align with a site’s use and character put these sites at greater risk of having their protected status challenged and ultimately be developed in an unplanned, piecemeal manner. This position also devalues the status of these designations as a whole. Parcels with poorly defined boundaries are also vulnerable to further erosion from inappropriate development undermining the integrity of the wider site.

The above provide the justification for the proposed boundary changes. The detailed boundary changes are illustrated in the ‘Atlas of Change’ but to provide some examples of why these boundary adjustments are necessary, we provide some photographic examples of sites whose boundaries need to be adjusted. All the photographs in Figure 1 below are of sites which are currently designated as Green Belt or MOL.

7. Figure 1 then includes an image of Kellogg Tower.
8. Consequently, the justification for the revised boundary is provided in the Stage 2 review that changes to the character and use of the sites has taken place since it was originally designated several decades ago. Given the analysis provided at Stage 1, it is considered this relates to the substantial residential development at the eastern part of the site (i.e. the implemented extant permission for development at the site).
9. Within the Atlas of Change document, it is then explained that the revised MOL Boundary will ‘Remove former Kellogg Tower site (MOL2)’.
10. It is therefore understood from the evidence base / Atlas of Change Document that the revised MOL boundary intended to remove the whole of the site, due to the approved residential development.

Analysis of Revised Boundary

11. At Appendix 1, TP Bennett have analysed the MOL Boundary against the current proposed layout.
12. This demonstrates that the proposed Blocks A, B and C all encroach over the revised MOL Boundary.
13. The study also demonstrates, however, that the implemented extant permission for development at the site also encroaches over the boundary with 3 blocks.

14. The study then provides some design commentary relating the positioning of the buildings within the revised scheme. In summary, the scheme has gone through extensive design development to provide a landscape-driven design that responds to the existing context of the site. Whilst there is an overlap between the block footprints and MOL boundary for the current scheme compared to the previous scheme, this is due to the following:
- The design has been progressed on the understanding that the entire site would be de-designated
 - The quality and generosity of the public realm, accessibility of the site and efficiency of the buildings have been the key drivers of the masterplan
 - Buildings A, B and C footprints, which clip the MOL boundary, are a highly efficient ‘two-stair’, 10-unit floorplate. As such, the footprints are designed to be as compact as possible, balancing both the quality of the accommodation and the efficiency of the buildings
 - The proposed buildings have been positioned to be offset from each other and from Atrium Point by a minimum of 15-19m, which is crucial to maintain adequate daylighting levels and limit overlooking.

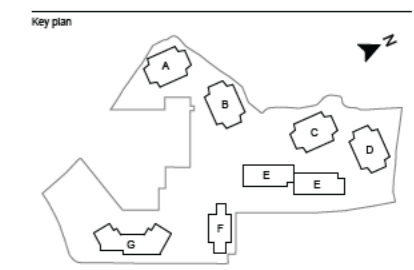
Conclusion

15. In summary, we understood that LB Ealing’s Policy Team advised that the revised MOL boundary was established in its proposed location as this was the boundary of development under the previous scheme.
16. The Emerging Local Plan’s Evidence Base / Atlas of Change Document that the revised MOL boundary intended to remove the whole of the site, due to the approved residential development.
17. From analysis the MOL Boundary against the extant permission it is clear that:
- (a) The whole of the site (i.e. Interland’s ownership) was not removed from the MOL designation
 - (b) The revised MOL boundary is not set at the consented extent of development at the site under the implemented extant permission.
18. We therefore consider the boundary has been set incorrectly, and from a review of satellite imagery appears to have been set at the edge of the existing car park on site (not the development boundary).
19. As a result of this, we therefore request that either the MOL Boundary is revised to remove the whole site under Main Modifications of the emerging Local Plan Process, or that it is confirmed that the proposed development will not be classified as being within the MOL due to Block’s A, B and C encroaching upon it.

Appendix 1: Assessment of Revised MOL Boundary

WORK IN PROGRESS
INFORMATION ONLY
08/07/2025 11:48:00

Client Name
Interland Group
Structural Engineer Name
Services Engineer Name
Consultant Name



Notes:
Do not scale. Figured dimensions only to be taken from this drawing. Check dimensions on site & report discrepancies to the architect.
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All areas have been measured from current drawings. They may vary because of (EG) survey, design development, construction tolerances, statutory requirements or re-definition of the areas to be measured.

GENERAL NOTES
HATCHED AREA AT LOWER GROUND AND BASEMENT LEVELS INDICATES BURIED ZONES.
COORDINATION OF TOPOGRAPHY LEVELS AND THE EXTENT OF RETAINING WALLS WITH THE LANDSCAPE, STRUCTURES AND CIVIL ENGINEERING CONSULTANTS IS ONGOING.
LANDSCAPE INFORMATION COORDINATION IS ONGOING. PLEASE REFER TO LANDSCAPE CONSULTANT DRAWINGS FOR LATEST LANDSCAPE INFORMATION.
TREE PLACEMENT AND SIZES ARE SHOWN INDICATIVELY.
COORDINATION OF BUILDING INTERNAL LAYOUTS IS ONGOING.
CONTEXT INFORMATION HAS BEEN TAKEN FROM THE EALING COUNCIL AURORA MAP. CONTEXT HAS BEEN SCALED FROM AN IMAGE AND IS TO BE USED FOR ILLUSTRATIVE PURPOSES ONLY. MEASUREMENTS MAY NOT BE EXACT.

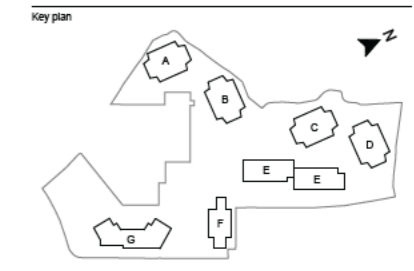
LEGEND
— Site Boundary
— Planning Boundary
- - - MOL boundary



WIP STUDY
Revised MOL line
Previously Consented Scheme
16.07.2025

WORK IN PROGRESS
INFORMATION ONLY
07/07/2025 12:48:24

Client Name
Interland Group
Structural Engineer Name
Services Engineer Name
Consultant Name



Notes:
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LEGEND
— Site Boundary
— Planning Boundary
- - - MOL boundary

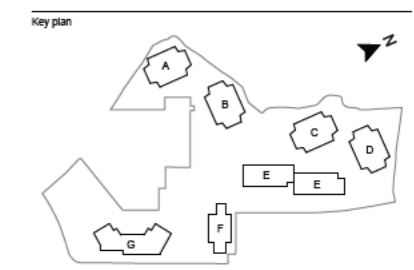


WIP STUDY
Revised MOL line
Current Scheme
16.07.2025



WORK IN PROGRESS
INFORMATION ONLY
08/07/2025 11:48:00

Client Name
Interland Group
Structural Engineer Name
Services Engineer Name
Consultant Name



Notes:
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LEGEND
— Site Boundary
- - - Planning Boundary
- - - MOL boundary

WIP STUDY
Revised MOL line
Massing diagram
16.07.2025

1. A new pedestrian and cyclist route provides the key route through the site, connecting the Sudbury Hill community to Grove Farm Park. This route is lined with generous amenity spaces, and it is important that these are an appropriate scale, both for their uses and for their relationship to the existing and proposed buildings.

A proposed bridge connection over the brook completes the link between the High Street and Grove Farm Park.

2. A public park is established at the centre of the site, creating a series of green, car-free spaces interlinked by pedestrian routes. Again, it is important that this park is generous and the scale is appropriate to the existing and proposed buildings.

3. Vehicular access routes are pushed to the perimeter of the site, creating pedestrian-priority public realm.

4. Efficiently-designed linear buildings line the High Street and vehicular access routes, shielding the site from external noise and forming a backdrop to the proposed public park (2), and Grove Farm Park. These are positioned to provide adequate offset from the existing High Street buildings and Atrium Point, and to provide the required widths of the vehicular access routes.

5. Point buildings line the boundary to Grove Farm Park and the primary route (1). Each of these provide 10 homes per level, served by a 'two-stair' core.

The resultant massing is refined through the use of chamfered corners, providing dual aspect to c.80% of the homes, creating high-quality residential accommodation in efficient and compact footprints / form.

These are positioned to provide adequate offset from the proposed linear buildings (4), and Atrium Point, whilst also considering the complex site topography along the boundary to Grove Farm Park.

6. Human-scale courtyards are proposed between the buildings, maintaining distances of at least 15 to 19 metres between the proposed and existing buildings to ensure daylighting and limit overlooking.



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[Redacted]

From: [Redacted] <[Redacted]@ealing.gov.uk>
Sent: 19 September 2025 12:30
To: [Redacted]
Cc: [Redacted]
Subject: RE: Park View Place - Massing Testing / Options

Hi [Redacted]

Yes in principle but only if this reflects the actual reality on the ground as de facto circumstances have changed. This is why the MOL boundary was amended in the emerging Local Plan as the evidence demonstrated that it no longer met the relevant tests for MOL designation. I'm not sure in the meantime that DM can discount the current MOL boundary and a case will still need to be made for the both the overlapping land parcels and how the wider development impacts on the for example its openness. On the other hand, I'm sure DM will take into account other planning benefits when weighing their decision most notably perhaps, any proposals to enhance access to the MOL. I am not familiar with the details of the proposed scheme but understood this to be a crucial element?

Kind regards,

[Redacted]

From: [Redacted] <[Redacted]@turley.co.uk>
Sent: 17 September 2025 11:30
To: [Redacted] <[Redacted]@ealing.gov.uk>
Cc: [Redacted] <[Redacted]@ealing.gov.uk>; [Redacted] <[Redacted]@ealing.gov.uk>; [Redacted] <[Redacted]@ealing.gov.uk>; [Redacted] <[Redacted]@ealing.gov.uk>; [Redacted] <[Redacted]@turley.co.uk>; [Redacted] <[Redacted]@turley.co.uk>
Subject: RE: Park View Place - Massing Testing / Options

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Hi [Redacted]

Many thanks for your email on this. Whilst we would have liked to have the Boundary updated as part on the current emerging Local Plan process, it is positive that you do not consider the development clipping over the revised MOL boundary should impede its delivery, and that the MOL boundary can be updated in future through the next Local Plan review to reflect the situation on the ground.

We are working towards an application submission before the end of the year, and as such it is key for the site coming forward that the proposals are not considered to be MOL development and as such the fast-track route at 35% affordable housing would still be applicable.

On the basis you are happy for the MOL boundary to be updated in future to reflect the on the ground situation, are you able to advise whether the policy team would support the position that the proposals wouldn't be classed as MOL development given only a small proportion of a few blocks clip over the revised boundary?

Kind regards,

[Redacted]

■■■■
■■■■■■■■■■

Turley

Mobile: +44 ■■■■■■■■■■
Office: 020 ■■■■■■■■■■

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Our co-owners are contactable in the usual ways and we suggest using mobile numbers in the first instance.



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From: ■■■■■■■■■■ <■■■■■■■■■■@ealing.gov.uk>
Sent: 10 September 2025 15:36
To: ■■■■■■■■■■ <■■■■■■■■■■@turley.co.uk>
Cc: ■■■■■■■■■■ <■■■■■■■■■■@ealing.gov.uk>; ■■■■■■■■■■ <■■■■■■■■■■@ealing.gov.uk>; ■■■■■■■■■■ <■■■■■■■■■■@ealing.gov.uk>; ■■■■■■■■■■ <■■■■■■■■■■@ealing.gov.uk>; ■■■■■■■■■■ <■■■■■■■■■■@ealing.gov.uk>
Subject: RE: Park View Place - Massing Testing / Options

Dera ■■■■■■■■■■

Thank for your email dated July 28th regarding MOL boundaries for Park View Place in North Greenford. ■■■■■ and ■■■■■ had passed on your correspondence. I am grateful for the update and this no doubt reflects the evolution of the scheme as it progresses through the planning system.

Unfortunately it is too late to make changes to proposed MOL boundaries regarding our emerging Local Plan as we are at an advanced stage in the examination process now. Notwithstanding this, it is highly likely that the Local Plan will undergo an almost immediate review post adoption to take account of significant changes in the architecture of the UK planning system. Most crucially, this includes the implications of the new standard method which will likely to result in changes to housing supply targets for the LPA. These will be reflected in a revised London Plan which is currently under review and we anticipate a draft being published in the second half of next year.

Any further proposed changes to MOL boundaries are best undertaken as part of this process and, as with the current proposals, will do no more than reflect on the reality of the situation on the ground, subject to planning consent having been obtained.

In my view, it would be premature to make any changes to the MOL boundaries now but this should not impede delivery of your proposed scheme provided consent is granted and from the information before me it seems things are moving in the right direction? It would be helpful to know what the likely timetable for consideration of the planning application will be and for eventual confirmation of any resolution to grant and subsequent approval granted once a legal agreement is signed.

In the meantime, I will hold this information on file and I would be grateful for any future updates on progress, any further material amendments and information on the subsequent implementation of the scheme. Assuming any future planning consent and its implementation reflects the information you have provided, this should help to provide a fairly solid basis to justify any future MOL boundary changes.

Happy to discuss further, if that would be of help and assistance.

Best Regards,

[Redacted]

[Redacted]

Strategic Planning Team
Planning Services
Economy and Sustainability
Ealing Council

Email: [Redacted] [ealing.gov.uk](mailto:[Redacted]@ealing.gov.uk)

Pronouns: [Redacted]



From: [Redacted] <[Redacted]@turley.co.uk>
Sent: 28 July 2025 09:57
To: [Redacted] <[Redacted]@ealing.gov.uk>; [Redacted] <[Redacted]@ealing.gov.uk>; [Redacted] <[Redacted]@ealing.gov.uk>
Cc: [Redacted] <[Redacted]@turley.co.uk>; [Redacted] <[Redacted]@turley.co.uk>
Subject: RE: Park View Place - Massing Testing / Options

WARNING : This Message has originated from outside your organization, If you do not trust this email please either delete or follow the guidance on OneSpace.

Hi all,

As requested in the meeting, we have undertaken an analysis of the revised MOL Boundary, and can advise that the proposed Blocks A, B and C all encroach over this boundary.

We understood that the Policy Team advised the revised boundary was established in its proposed location as this was the boundary of development under the previous scheme, however TP Bennett have undertaken a study (appendix 1 of the attached) which also demonstrates that the implemented extant permission for the sites redevelopment also encroaches over the revised boundary.

From a review of the emerging Local Plan evidence base, we also understand the justification for revising the MOL boundary was to remove the Kellog Tower Site, however the boundary selected does not remove the full site.

The attached note sets out our full assessment of this, and we would be grateful if this could be passed to the policy team as part of our ongoing discussion on the MOL, and ideally we would like to request they revise the MOL Boundary to remove the whole site under Main Modifications of the emerging Local Plan Process.

We have also updated the PPA programme for your review / discussion:

Date	Key Milestone	Attendees	Meeting Topics (to include)
w/c 28/07	Massing Re-Distribution Feedback	(only to meet if required)	Feedback on massing re-distribution presented at meeting 08/07

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From: [REDACTED] <[REDACTED]@turley.co.uk>

Sent: 22 July 2025 10:57

To: [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>

Cc: [REDACTED] <[REDACTED]@turley.co.uk>; [REDACTED] <[REDACTED]@turley.co.uk>

Subject: RE: Park View Place - Massing Testing / Options

Hi all,

Further to the below, I wanted to follow up with some further information requested on Weston Home's offsite panelised system manufacturing arm, British Offsite. Their brochure is attached and a comprehensive image pack of both completed and ongoing projects constructed using their British Offsite panelling system, which can be downloaded from the below link:

<https://we.tl/t-sl8J8Yao2L>

The British Offsite panels are used exclusively for the internal fabric of the building. They are fully compatible with any external façade treatment, including the use of normal bricks. This means the external facade of a development such as what is proposed for Park View Place is not affected by the use of the panelling system, and a complete choice for bricks and finishes will be available.

The pack of project images in the above link demonstrates how the panels integrate with a wide range of facade treatments. From a visual standpoint, you would not be able to distinguish these from traditional construction methods, and the system delivers the same architectural outcomes, with enhanced speed, efficiency, and quality control.

Importantly, the British Offsite panel system carries full technical accreditation and sustainability credentials. This includes BRE fire testing, acoustic testing, ISO 9001-certified quality management, and NHBC compliance. These certifications provide both technical managers and end customers with the confidence that the product meets the highest standards of safety, performance, and reliability.

If you have any queries on this Weston would be happy to discuss further or even provide a tour of the factory if this would be of interest.

We are discussing the programme with Weston today so I will send through the proposed programme later this week. However, as part of this we are likely to propose the follow up DRP in mid-August.

I appreciate that we would never usually propose going to DRP until officers yourselves are comfortable with the proposed scheme/massing, however we are conscious it will be August and diaries will be busy with leave, therefore would you be happy for us to arrange a date for the DRP now, with the view to meet with yourselves again before hand to discuss the massing changes proposed further if needed?

I have also prepared a new link for the presentation and massing options tested as the below link will have now expired - <https://we.tl/t-udop5Bkn30>

Are you able to please advise when we may be able to received some feedback on these options?

Kind regards,

[REDACTED]

[Redacted]

Turley

Mobile: +44 [Redacted]
Office: 020 [Redacted]

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From: [Redacted] <[Redacted]@turley.co.uk>

Sent: 15 July 2025 19:29

To: [Redacted] <[Redacted]@ealing.gov.uk>; [Redacted] <[Redacted]@ealing.gov.uk>; [Redacted] <[Redacted]@ealing.gov.uk>

Cc: [Redacted] <[Redacted]@turley.co.uk>; [Redacted] <[Redacted]@turley.co.uk>

Subject: Park View Place - Massing Testing / Options

Hi all,

Many thanks again for your time last week. The presentation presented can be downloaded from the following link:

<https://we.tl/t-FhYAUfZLeZ>

This includes (from slide 47 onwards) an appendix that includes all of the massing views for each of the 6 massing redistributions options assessed. As discussed last week, it is felt as a design team that Option D is the preferable re-distribution on the basis that it maintains a balanced composition across block's A to C from within Grove Farm, with Block D as the focus for a taller building marking a node point closes to the station. However, Interland and Weston are not wed to this option, and are willing to explore/progress further any of the other options tested if you consider they are preferable.

We will come back to you on the programme and other actions with us following the meeting shortly, but if you have any queries please don't hesitate to ask.

Kind regards,

[Redacted signature block]

Turley

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Office: 020 [Redacted]

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From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839
Date: 23 December 2025 16:37:00
Attachments: [image001.png](#)
[image002.png](#)

Hi [REDACTED]
Apologies again for the delay. This has now been signed off by the Senior Manager and should be with you hopefully tomorrow.
Thanks,
[REDACTED]

From: [REDACTED]
Sent: 19 December 2025 14:56
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

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Hi [REDACTED]
Is there any further update on this please?
It would be great if we could receive this before Christmas if possible please.
Many thanks,
[REDACTED]

Turley

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Office: 020 [REDACTED]
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From: [REDACTED]
Sent: 17 December 2025 09:20
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [REDACTED]

Thanks for the update, can we expect the response to be issued this week?
Many thanks,
[REDACTED]

Turley

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Office: 020 [REDACTED]
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From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 15 December 2025 09:09
To: [REDACTED] <[REDACTED]@turley.co.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@turley.co.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [REDACTED]
Apologies for the delayed response, I've been having some tech issues and have only just seen your last two emails.
I was a bit delayed receiving design comments but I have these now so can update my draft and get it over to [REDACTED] today for her to begin her review and sign-off.
Thanks,

[REDACTED]

From: [REDACTED] <[REDACTED]@turley.co.uk>
Sent: 12 December 2025 13:25
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@turley.co.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

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Hi [REDACTED]
Are you able to advise when we can expect the pre-application response please?
Kind regards,

[REDACTED]
[REDACTED]

Turley

Mobile: +44 [REDACTED]
Office: 020 [REDACTED]
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From: [REDACTED] <[REDACTED]@turley.co.uk>
Sent: 09 December 2025 10:08
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@turley.co.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [REDACTED]

Could you provide an update on this pre-app response please?
Kind regards,

[REDACTED]
[REDACTED]

Turley

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Office: 020 [REDACTED]
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From: [REDACTED] <[REDACTED]@turley.co.uk>
Sent: 04 December 2025 15:14
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@turley.co.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [REDACTED]
I just wanted to check in to confirm if we're still on track to receive the pre-app response next week?
Just to flag, one thing we are hoping you can confirm explicitly in the pre-app response is the GLA's position whether the proposals should be classed as MOL development due to part of the blocks clipping the revised MOL boundary.

Many thanks,
[REDACTED]
[REDACTED]

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From: [REDACTED] <[REDACTED]@turley.co.uk>
Sent: 25 November 2025 17:53
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@turley.co.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [REDACTED]
Yes agreed, it makes sense to hold off as we're also keen to understand what it means for the scheme and would prefer the response to include this.
We haven't had any further discussions with Ealing on the MOL de-designation boundary and the AH threshold, as we're also waiting to hold off on this until we have the draft LPG so that we can present the proposed submission AH offer as part of the discussion.

Attendees from our side for the pre-app were:

- [REDACTED] - Interland
- [REDACTED] - Weston Homes
- [REDACTED] - Weston Homes
- [REDACTED] - TP Bennett
- [REDACTED] - Turley
- [REDACTED] - Turley
- [REDACTED] - Turley

[REDACTED] then attended from Ealing.

Many thanks,
[REDACTED]
[REDACTED]

Turley

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Office: 020 [REDACTED]
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From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 25 November 2025 17:41
To: [REDACTED] <[REDACTED]@turley.co.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [REDACTED]
Apologies for the delayed response.
I understand the draft LPG will be out by the end of the week. I believe we have an internal information session on it next week.
Given this, would you agree it would be beneficial to hold off issuing the pre-app advice another circa two weeks so we can include the draft LPG? I know you're keen to submit the application soon, but I also know you're keen to understand what the draft LPG and emergency measures announcement could mean for your scheme!
If you've had any further communication with the LPA confirming their position regarding the MOL de-designation boundary and the AH threshold, do let me know.
Further, are you able to provide a list of everyone who attended the pre-app meeting?

Thanks,
[REDACTED]

From: [REDACTED] <[REDACTED]@turley.co.uk>
Sent: 18 November 2025 12:22
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

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Hi [REDACTED]
I hope you're well?
I just wanted to check in to see if you'd received any further guidance internally relating to the queries we raised relating the ministerial statement and time-limited reduced fast track?
Kind regards,
[REDACTED]
[REDACTED]
[REDACTED]

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From: [REDACTED] <[REDACTED]@turley.co.uk>
Sent: 28 October 2025 14:51
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839
Hi [REDACTED]

Apologies for the delay with this, however please find attached our planning note setting out the planning matters we'd like to discuss, which are:

- The site's MOL status
- The proposed Affordable Housing provision and tenure split
- Principle of purpose-built shared living use
- Design Updates

As you'll appreciate the ministerial statement has changed (and simplified) the affordable housing position a lot, but took us some time to confirm the affordable housing provision following this, which has led to the delay in sending this over.

Nothing you need to know at arrival, just advise reception downstairs you are here to meet me and they should send you upstairs to our office. We look forward to discussing tomorrow.

Many thanks,

[REDACTED]
[REDACTED]
[REDACTED]

Turley

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Office: 020 [REDACTED]
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From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 21 October 2025 10:37
To: [REDACTED] <[REDACTED]@turley.co.uk>; Pre-applications <[REDACTED]>
Cc: [REDACTED] <[REDACTED]@turley.co.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839
Hi [REDACTED]

I can now confirm we could attend the pre-app in person.

It will be myself, [REDACTED] (team leader) and [REDACTED] (urban design).

I will get the meeting invitation updated with the address you previously provided. Please let me know if there's anything else we need to know for arrival.

Thanks,

[REDACTED]

From: [REDACTED]
Sent: 16 October 2025 15:59
To: [REDACTED] <[REDACTED]@turley.co.uk>; Pre-applications <[REDACTED]>
Cc: [REDACTED] <[REDACTED]@turley.co.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839
Hi [REDACTED]

Thanks for being able to host. Will confirm with you next week.

Re the AH – agree I don't think a viability officer needs to attend. I can consult them internally after the meeting if beneficial.

Thanks for confirming re the existing pack. Will keep an eye out for your letter next week.

Thanks,

[REDACTED]

From: [REDACTED] <[REDACTED]@turley.co.uk>
Sent: 16 October 2025 10:47
To: [REDACTED] <[REDACTED]@london.gov.uk>; Pre-applications <[REDACTED]>
Cc: [REDACTED] <[REDACTED]@turley.co.uk>

Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

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Hi [REDACTED]

Yes that fine for us to host at our office (Brownlow Yard, 12 Roger Street, WC1N 2JU) if you can confirm this works for you when your colleagues return from leave (we also have facilities for this to be hybrid).

We would like to discuss AH, but only the tenure split within the provision (and associated Fast-track compliance (appreciating this could be subject to change)) with you and we won't be submitting any viability evidence so I don't think it's necessary for your viability colleagues to attend.

For design purposes, please still refer to design pack uploaded 17/09. However, I will send through a brief planning cover letter setting out the topics we would like to discuss next week.

Many thanks,

[REDACTED]
[REDACTED]
[REDACTED]

Turley

Mobile: +44 [REDACTED]

Office: 020 [REDACTED]

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From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 15 October 2025 11:14

To: [REDACTED] <[REDACTED]@turley.co.uk>; Pre-applications <[REDACTED]>

Cc: [REDACTED] <[REDACTED]@turley.co.uk>

Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [REDACTED]

I won't be able to confirm with you until next week as some officers are currently on leave. If all officers can attend in person, we would need you to host as we no longer have a suitable meeting room available for the scheduled meeting. Would that work for you? In any case, I will get back to you next week – please chase me if you haven't heard anything by this time next week.

Separately, I note in a previous email you said you only need urban design officers to attend the meeting. I can see my colleague has also invited viability colleagues to this meeting, so I want to check whether you're intending to submit any viability information / wanting to discuss AH / viability?

Also, are you intending to submit an updated pre-app pack / any additional information? Or can we rely on the one uploaded 17/9?

Thanks,

[REDACTED]

From: [REDACTED] <[REDACTED]@turley.co.uk>

Sent: 15 October 2025 09:57

To: [REDACTED] <[REDACTED]@london.gov.uk>; Pre-applications <[REDACTED]>

Cc: [REDACTED] <[REDACTED]@turley.co.uk>

Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

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Hi [REDACTED]

I hope you're well?

I just wanted to check whether it was possible for our meeting on 29th October to be in person please?

Kind regards,

[REDACTED]
[REDACTED]
[REDACTED]

Turley

Mobile: +44 [REDACTED]

Office: 020 [REDACTED]

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From: [REDACTED] <[REDACTED]@turley.co.uk>

Sent: 30 September 2025 16:41

To: [REDACTED] <[REDACTED]@london.gov.uk>; Pre-applications <[REDACTED]>

Cc: [redacted] <[redacted]@turley.co.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [redacted]
Only urban design officers alongside planning officers will be required.
Many thanks,

[redacted]
[redacted]
[redacted]

Turley

Mobile: +44 [redacted]
Office: 020 [redacted]
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From: [redacted] <[redacted]@london.gov.uk>
Sent: 30 September 2025 16:37
To: [redacted] <[redacted]@turley.co.uk>; Pre-applications <[redacted]>
Cc: [redacted] <[redacted]@turley.co.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [redacted]
Yes, once the TL has done what they need to do, I'll liaise with [redacted] about suitable dates.
Could you confirm which of my colleagues you'd also like at the meeting – TfL, urban design, energy etc. ?
Thanks,

From: [redacted] <[redacted]@turley.co.uk>
Sent: 30 September 2025 13:52
To: Pre-applications <[redacted]> [redacted] <[redacted]@london.gov.uk>
Cc: [redacted] <[redacted]@turley.co.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

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Hi [redacted]
Thanks for your help with resolving this.
@ [redacted] are you able to suggest some dates once you've heard back from your team leader please?
Many thanks,

[redacted]
[redacted]
[redacted]

Turley

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Office: 020 [redacted]
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From: Pre-applications <[redacted]>
Sent: 30 September 2025 12:15
To: [redacted] <[redacted]@turley.co.uk>; Pre-applications <[redacted]>
<[redacted]@london.gov.uk>
Cc: [redacted] <[redacted]@turley.co.uk>
Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [redacted]
Apologies for the delay in coming back to you.
We have requested the sales invoice that will be send to payer once issued. Please note that this can take up to 2 weeks.
Your application has been validated and a meeting will be offer once reviewed by the team leader. You will be able to have the meeting before payment, but the payment will need to be received prior issuing the pre-application advice.

Kind regards

[redacted]
[redacted]

Technical Support Officer, Planning
GREATERLONDONAUTHORITY

Union Street, London SE1 0LL

██████████
[london.gov.uk](https://www.london.gov.uk)

██████████ [london.gov.uk](https://www.london.gov.uk)

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From: ██████████ <██████████@turley.co.uk>

Sent: 29 September 2025 16:51

To: Pre-applications <██████████@london.gov.uk>

Cc: ██████████ <██████████@turley.co.uk>

Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Importance: High

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Hi all,

Sorry to chase, however this pre-app meeting is currently holding up the entire application submission programme for this development and is therefore becoming critical.

We note you require payment before you can offer a date, however no invoice for this pre-app fee has been issued so my client is unable to pay – can this invoice please be issued urgently?

If there is anything that can be done to allow a meeting date to be arranged in the interim that would be greatly appreciated.

Many thanks,

██████████
██████████
██████████

Turley

Mobile: +44 ██████████

Office: 020 ██████████

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From: ██████████ <██████████@turley.co.uk>

Sent: 23 September 2025 16:25

To: Pre-applications <██████████@london.gov.uk>

Cc: ██████████ <██████████@turley.co.uk>

Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi ██████████

Can you please provide an invoice ASAP for my client to pay if one has not yet been issued please?

@██████████ – given we did not receive written pre-app advice, which was paid for, from the first pre-app is it possible to get a meeting in the diary prior to the fee for this meeting being paid please?

This meeting is currently critical for our programme leading to a planning application submission at end of November.

Kind regards,

██████████
██████████
██████████

Turley

Mobile: +44 ██████████

Office: 020 ██████████

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From: Pre-applications <██████████@london.gov.uk>

Sent: 17 September 2025 15:01

To: ██████████ <██████████@london.gov.uk>; ██████████ <██████████@turley.co.uk>; Pre-applications <Pre-applications@london.gov.uk>

Cc: ██████████ <██████████@turley.co.uk>

Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi ██████████

Your application is currently invalid and is awaiting payment. We will be able to have a look at officers' availability and propose you a meeting date once your application is valid.

Kind regards

[REDACTED]
[REDACTED]
Technical Support Officer, Planning
GREATERLONDONAUTHORITY
Union Street, London SE1 0LL
[REDACTED]
london.gov.uk

[REDACTED] [london.gov.uk](https://www.london.gov.uk)

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From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 17 September 2025 14:11

To: [REDACTED] <[REDACTED]@turley.co.uk>; Pre-applications <[REDACTED]>

Cc: [REDACTED] <[REDACTED]@turley.co.uk>

Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

Hi [REDACTED]

Thanks for this. [REDACTED] and his team will review diaries and send out a meeting request – keep an eye out.

Thanks,

[REDACTED]

From: [REDACTED] <[REDACTED]@turley.co.uk>

Sent: 17 September 2025 12:52

To: Pre-applications <[REDACTED]> [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@turley.co.uk>

Subject: RE: 2024/0766 - Follow up pre-app - Park View Place - 2025/0839

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Thanks [REDACTED]

This has now been submitted with reference 2025/0839. @ [REDACTED] are we able to now get a date in the diary for a meeting please?

Many thanks,

[REDACTED]
[REDACTED]
[REDACTED]

Turley

Mobile: +44 [REDACTED]

Office: 020 [REDACTED]

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From: Pre-applications <[REDACTED]>

Sent: 17 September 2025 12:45

To: [REDACTED] <[REDACTED]@turley.co.uk>; Pre-applications <[REDACTED]>

Cc: [REDACTED] <[REDACTED]@turley.co.uk>; [REDACTED] <[REDACTED]@london.gov.uk>

Subject: Re: 2024/0766 - Follow up pre-app - Park View Place

Good afternoon [REDACTED]

Please submit the Level 2 Follow Up meeting by following the instructions through this link:

<https://www.london.gov.uk/programmes-strategies/planning/planning-applications-and-decisions/pre-planning-application-meeting-service>

Kind regards,

[REDACTED]
[REDACTED]
Planning Data and Performance Officer
GREATERLONDONAUTHORITY
Union Street, London SE1 0LL
london.gov.uk
[REDACTED] [london.gov.uk](https://www.london.gov.uk)

From: [REDACTED] <[REDACTED]@turley.co.uk>

Sent: 17 September 2025 10:44

To: Planning Support <[REDACTED]>

Cc: [REDACTED] <[REDACTED]@turley.co.uk>; [REDACTED] <[REDACTED]@london.gov.uk>

Subject: 2024/0766 - Follow up pre-app - Park View Place

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Good morning,

Further to the below, could we please arrange a follow up pre-app meeting for 2024/0766 for the proposed Development at Park View Place.

Could you please confirm what you require to get a meeting date in the diary please?

Many thanks,

[Redacted]

[Redacted]

Turley

Mobile: +44 [Redacted]

Office: 020 [Redacted]

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From: [Redacted]

Sent: 15 September 2025 16:37

To: [Redacted]

Cc: [Redacted]; [Redacted]; [Redacted]; [Redacted]; [Redacted]

Subject: RE: Park View Place - GLA pre-app 2024/0766

Hi [Redacted]

Apologies for the delayed response as I have been on leave.

Sounds like a follow-up pre-application meeting would be most suitable – please email [Redacted] to arrange.

Thanks,

[Redacted]

From: [Redacted] <[Redacted]@turley.co.uk>

Sent: 04 September 2025 10:20

To: [Redacted] <[Redacted]@london.gov.uk>

Cc: [Redacted] <[Redacted]@ealing.gov.uk>; [Redacted] <[Redacted]@ealing.gov.uk>; [Redacted] <[Redacted]@turley.co.uk>; [Redacted] <[Redacted]@turley.co.uk>

Subject: RE: Park View Place - GLA pre-app 2024/0766

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Hi [Redacted]

We would also present amendments and expect advice/comments to follow please, as we have not received a written response yet (and this is something our client would like).

Many thanks,

[Redacted]

[Redacted]

Turley

Mobile: +44 [Redacted]

Office: 020 [Redacted]

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From: [redacted] <[redacted]@london.gov.uk>
Sent: 21 August 2025 15:30
To: [redacted] <[redacted]@turley.co.uk>
Cc: [redacted] <[redacted]@ealing.gov.uk>; [redacted] <[redacted]@ealing.gov.uk>; [redacted] <[redacted]@turley.co.uk>; [redacted] <[redacted]@turley.co.uk>
Subject: RE: Park View Place - GLA pre-app 2024/0766

Hi [redacted]

Apologies for missing your previous email!

Thanks for the update re MOL and LBE's EIP. This is really helpful context.

In terms of follow-up discussions, would you be intending to present scheme amendments and expect advice/comments to follow? Or is it more a quick update and timeline for moving forward?

Thanks,

[redacted]

From: [redacted] <[redacted]@turley.co.uk>
Sent: 21 August 2025 13:56
To: [redacted] <[redacted]@london.gov.uk>
Cc: [redacted] <[redacted]@ealing.gov.uk>; [redacted] <[redacted]@ealing.gov.uk>; [redacted] <[redacted]@turley.co.uk>; [redacted] <[redacted]@turley.co.uk>
Subject: RE: Park View Place - GLA pre-app 2024/0766

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Hi [redacted]

Sorry to chase, however are you able to come back on my email below regarding a follow up meeting for the above site please?

Kind regards,

[redacted]

[redacted]
[redacted]

Turley

Mobile: +44 [redacted]
Office: 020 [redacted]
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From: [redacted] <[redacted]@turley.co.uk>
Sent: 14 August 2025 11:08
To: [redacted] <[redacted]@london.gov.uk>
Cc: [redacted] <[redacted]@ealing.gov.uk>; [redacted] <[redacted]@ealing.gov.uk>; [redacted] <[redacted]@turley.co.uk>; [redacted] <[redacted]@turley.co.uk>
Subject: RE: Park View Place - GLA pre-app 2024/0766

Hi [redacted]

I hope you're well?

Since we last met, we have been in ongoing discussion with LB Ealing on a number of topics, including the MOL status.

Following the initial round of the emerging Local Plan EIP hearing sessions earlier this summer, including the MOL boundary changes hearing session, LB Ealing have advised they now comfortable that significant weight can be attributed to the sites MOL de-designation as this was not challenged during the EIP hearing. However, we are continuing to have ongoing discussions on the MOL as the proposed development (as well as the extant scheme) both still encroach over the revised MOL Boundary.

Consequently, we'd be grateful for a follow up meeting with yourself and GLA colleagues to bring you up to speed on the proposals and specifically discuss the MOL status and affordable housing offer / fast-track route compliance. Do we need to submit up a formal follow up pre-app request or

can we arrange this direct with yourself?

Many thanks,

█

█ █
█

Turley

Mobile: +44 █

Office: 020 █

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From: █ █ <█@█.london.gov.uk>

Sent: 03 March 2025 11:48

To: █ █ <█@ealing.gov.uk>; █ █ <█@turley.co.uk>

Subject: Park View Place - GLA pre-app 2024/0766

Hi █ and █

Following on from the pre-application meeting about development at Park View place on 30/01, I'm just touching base to see whether there has been any update on confirming whether the MOL designation would be removed by the time a planning application is submitted, or even by the time a decision is made on the application?

As discussed during the meeting, it would be preferable to issue the pre-app note with a more definitive understanding of the designation/de-designation. However, if a better understanding of this position is still looking to be quite a way off do let me know so as not to unnecessarily delay issuing the note.

Thanks,

█

█ █

Senior Strategic Planner, Development Management

Greater London Authority
169 Union Street London SE1 0LL

london.gov.uk

█@london.gov.uk

My pronouns are: █

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<https://www.london.gov.uk/>

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: 2025/0839/P2F Park View Place pre-application response
Date: 28 January 2026 16:00:00
Attachments: [image001.jpg](#)

Hi [REDACTED]
Thanks for the update re your upcoming meeting with Ealing, that's helpful to understand. I've just sent a Teams invitation to you and [REDACTED] for 3 March as discussed. Could you please circulate amongst your team?
In terms of meeting ahead of that, [REDACTED] will need to advise.
Thanks,
[REDACTED]

From: [REDACTED]
Sent: 26 January 2026 11:51
To: [REDACTED]; [REDACTED]
Cc: [REDACTED]; [REDACTED]; [REDACTED]
Subject: Re: 2025/0839/P2F Park View Place pre-application response

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Good morning [REDACTED]
We have indeed submitted reps to the LPG. These are attached above and sets out our case in more detail.
In the meantime, we are trying to meet with senior officers at Ealing in order to set out our strategy for affordable housing provision. In summary, we will submit a viability that shows that the current offer at 23.8% AH (20% for resi and 35% for the co-living element in line with the recent LPG) is not viable. However this is a commercial offer with a better tenure split (60:40 SR:SO) than previously and on the provision that we cannot accept a late-stage review mechanism, due to the funding issues it creates. Clearly, Ealing will need to review the viability but on this basis we can submit the application in the coming weeks.
We hope to have this Ealing meeting in the next week, and thus had hoped to meet with you shortly after. A delay of a month to catch up with you is unfortunate. Can we take the meeting slot on the 3rd March at 4pm, but ask that if we have an update from Ealing then we could still meet with [REDACTED] before then?
Hope you have an enjoyable leave.

Regards,
[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 26 January 2026 10:02
To: [REDACTED] <[REDACTED]@interland.co.uk>; [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@turley.co.uk>; [REDACTED] <[REDACTED]@weston-homes.com>; [REDACTED] <[REDACTED]@turley.co.uk>

Subject: RE: 2025/0839/P2F Park View Place pre-application response

Hi [REDACTED]

Thanks for your email.

Hopefully you got your representation on the Support for Housebuilding draft LPG submitted, which closed last week. If you didn't, please let me know and I'll see if we can still get submission to the team for you. I also encourage you to make reps on the draft NPPF, which closes on 10 March.

In terms of meeting to discuss a way forward, I am more than happy to set this up however, I am on leave from Wednesday through most of Feb which unfortunately means the earliest I can offer would be the first week of March – 3 March at 4pm, 4 March at 4pm, 5 March at 3:30pm or 6 March at 3:30pm. Please let me know if this works for your team and apologies for the delayed timing.

In the interim, if you have a registered provider on board for the affordable housing element, I can put you in touch with our Housing and Land team to discuss the potential for grant funding (if you haven't already). This would help our meeting when I'm back if these discussions are already underway. Please let me know.

Thanks,

[REDACTED]

From: [REDACTED] [REDACTED] <[REDACTED]@interland.co.uk>

Sent: 20 January 2026 10:41

To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] [REDACTED] <[REDACTED]@turley.co.uk>; [REDACTED] [REDACTED] <[REDACTED]@weston-homes.com>; [REDACTED] [REDACTED] <[REDACTED]@turley.co.uk>

Subject: Re: 2025/0839/P2F Park View Place pre-application response

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Hi [REDACTED]

Hope this finds you well.

I am writing on behalf of Interland, as the landowner of the above site. This is in response to the pre-application report received on Christmas Eve.

We would have really appreciated if we could have been given a heads up given the significant impact the report has had on the application, or even a follow up communication. We had continued to prepare the application and this could have been submitted next month.

The report suggests that the scheme should be 50% affordable or follow a viability led route that would mean also a late stage review. The review would render the development un-fundable and therefore not deliverable. The existence of the recent LPG itself proves that viability-led route through planning does not work for developers.

We understand that unfortunately policy has created a scenario where the site must follow green belt rules, and clearly you cannot set unwanted precedents. However, we would contend that this is a unique site by virtue of its complex planning history. In a time of trying to encourage housebuilding, this has done the reverse. This is a redundant car park, it is brownfield land. There is both an implemented consent for

development on the site (c. 350 homes) and a linked resolution to grant a further planning application (c.290 homes) on adjacent land, both of which were secured in 2020-22 under the FTR route with c.35% affordable housing with no LSR. As you'll be aware it has not been possible to deliver either scheme due to viability/market constraints. Ealing have been consulting on de-designating it as MOL since November 2022. We cannot affect the lengthy wait for the Local Plan. It cannot be right to effectively treat this site as green belt, and we will be submitting reps to the draft LPG to make this case.

Therefore we would a follow-up conversation with you and senior officers to discuss what can be done to unlock the site as the new scheme is ready to be submitted with a development partner (Weston) on board if viability challenges can be addressed. It would be very helpful if Housing officers can attend as well in order to understand what can be done with grant funding to help the situation.

I look forward to hearing from you on your availability.

Regards,

[REDACTED]



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From: Pre-Applications <[REDACTED]>
Sent: 24 December 2025 08:13
To: [REDACTED] <[REDACTED]> <[REDACTED]@turley.co.uk>
Subject: 2025/0839/P2F Park View Place pre-application response

Dear [REDACTED]

Please find attached a copy of the Pre-application meeting response letter relating to 2025/0839/P2F, Park View Place, Park View Place, Greenford Road, Sudbury Hill, UB6 0FF.

Regards

[REDACTED] [REDACTED]

[REDACTED]

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Park View Place post-GLA pre-app catch-up
Date: 03 March 2026 10:35:51
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image774949.png](#)
[image072980.png](#)
[image835642.png](#)
[image517621.png](#)

Hi [REDACTED]

Hope all is well. I'll try and give you a quick call on the mobile – but following our catch up a couple of weeks ago and in advance of our meeting this afternoon, I just wanted to check if you had the chance to speak with [REDACTED] /LBE on their updated position (which had been reviewed with Cabinet lead). I spoke with [REDACTED] a week or so ago and she said that she would give you a call – but I just want to check in advance of the meeting and client expectations on things having moved forward. [REDACTED] so haven't been able to clarify direct.

Many thanks

[REDACTED]

[REDACTED]
[REDACTED]

Mobile: [REDACTED]
Office: 020 [REDACTED]



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-----Original Appointment-----

From: [REDACTED] <[REDACTED]@turley.co.uk> **On Behalf Of** [REDACTED]

Sent: 03 March 2026 10:01

To: [REDACTED]
[REDACTED]

Cc: [REDACTED]

Subject: FW: Park View Place post-GLA pre-app catch-up

When: 03 March 2026 16:00-16:30 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.

Where: Microsoft Teams Meeting

Please use this meeting link this afternoon

[REDACTED]

Mobile: +44 [REDACTED]

Office: 020 [REDACTED]



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-----Original Appointment-----

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 03 March 2026 09:57

To: [REDACTED]

Cc: [REDACTED]

Subject: Park View Place post-GLA pre-app catch-up

When: 03 March 2026 16:00-16:30 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.

Where: Microsoft Teams Meeting

Replacement meeting – please use this one.

@ [REDACTED] please check invitees to make sure everyone is there.

Microsoft Teams meeting

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Park View Place post-GLA pre-app catch-up
Date: 03 March 2026 16:51:31
Attachments: [image837973.png](#)
[image652298.png](#)
[image386881.png](#)
[image296001.png](#)
[Support for Housebuilding LPG - Written Representations - Interland Group.pdf](#)

Hi both,

Many thanks for your time this afternoon, it was very helpful to understand next steps in order to take this application forward.

For reference, the reps we have submitted to your policy team for the LPG consultation are attached.

Kind regards,

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

Mobile: +44 [REDACTED]
Office: 020 [REDACTED]



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-----Original Appointment-----

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 03 March 2026 09:57

To: [REDACTED]

Cc: [REDACTED]

Subject: Park View Place post-GLA pre-app catch-up

When: 03 March 2026 16:00-16:30 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.

Where: Microsoft Teams Meeting

Replacement meeting – please use this one.

@ [REDACTED] [REDACTED] please check invitees to make sure everyone is there.

Microsoft Teams meeting

22 January 2026

Delivered via email

The Planning Team
Greater London Authority
City Hall
Kamal Chunchie Way
London
E16 1ZE

Dear Sir/Madam,

INTERLAND GROUP: REPRESENTATIONS TO DRAFT SUPPORT FOR HOUSEBUILDING LONDON PLAN GUIDANCE (NOVEMBER 2025 – JANUARY 2026 CONSULTATION)

We write on behalf of our client, Interland Group (hereafter: “our client”), in response to the Greater London Authority's ("GLA") consultation on the Draft Support for Housebuilding London Plan Guidance (“LPG”) which runs until 22nd January 2026.

Our client is the landowner of the Park View Place site, in the London Borough of Ealing, which as set out below, constitutes brownfield land in a sustainable development location, is under single ownership and is available for residential-led redevelopment (c.550 residential units and c.350 co-living (PBSL) units), with a planning application currently under preparation for submission in Q1 2026 following detailed and lengthy pre-application discussions with LB Ealing and GLA Officers (GLA refs. 2024/0766/P2I and 2025/0839/P2F). A delivery partner, Weston Homes, is also in place for the development meaning, subject to planning permission, the development is ready to be delivered.

The site is predominantly the redundant car park to the former Kellogg Tower office complex in Greenford, which used to comprise the headquarters of the engineering firm Kellogg. The application site comprises approximately 2.4ha and lies on the western side of Greenford Road near its junction with Whitton Avenue West.

The site has been subject to previous planning applications for its redevelopment for residential led proposals, with the northern half of the site receiving planning permission for a mixed-use development of 5 blocks with 346 residential units (Ref: 182843FUL) in 2020. The southern half subsequently received resolution to grant planning permission in February 2022 (Ref. 213378FUL) for 288 residential units, 426sqm of commercial floorspace and 166sqm of community space within five buildings of between 6 and 11 storeys. The original ‘Building 1’, consented as part of the application ref. 182843FUL, was superseded by a smaller alternative ‘Building 1’ under application ref. 213378FUL and consequently, the total number of homes with planning permission and resolution to grant at the site is 558 homes, of which 204 are affordable housing.

Turley
Brownlow Yard
12 Roger Street
London, WC1N 2JU
T 020 [REDACTED] turley.co.uk

The site also lies just north of, and surrounds, Atrium Point (formerly Kellog Tower), a group of 10 storey, former office buildings converted into 263 flats (Ref: PAN/2015/5736). The site itself contains a large area of surface car parking, a hardstanding entrance area and an open landscaped area to the south of Atrium Point.

The site lies within designated Metropolitan Open Land (MOL), however the emerging Ealing Local Plan Final Proposals proposes to de-designate the site from the MOL, and was first proposed to be de-designated by LB Ealing at Regulation 18 Consultation in November 2022. The site's de-designation as MOL has therefore been proposed in excess of 3 years, and is supported by Interland Group, however due to the lengthy Local Plan preparation process, the site is still waiting for this to be formally adopted.

It is important to note that the site has both an implemented extant planning permission (Ref: 182843FUL) and resolution to grant planning permission (ref. 213378FUL), both following the fast-track route at 35% affordable housing. Neither development has been delivered, at 35% affordable housing, due to viability issues at the site.

The proposals in the Draft LPG will have significant implications for our clients site, due to the changing eligibility of the revised Fast Track Route (the time-limited planning route) excluding sites being de-designated from MOL.

Our detailed responses to question 5 of the consultation is set out in **Appendix 1** of this letter. In summary, however, our client disagrees with the eligibility criteria for the limited time planning route and ask that it is re-considered so this site and other similar previously developed sites are included and benefit from the Time-Limited Planning Route. Furthermore, our client considers that sites released from, or proposed to be released from, Metropolitan Open Land prior to the publication of the draft LPG should also benefit from the Time-Limited Planning Route.

We would welcome the opportunity to discuss these representations with you further, should you find this of assistance. If you have any queries, please do not hesitate to contact myself or my colleague [REDACTED] ([REDACTED] [turley.co.uk](mailto:[REDACTED]@turley.co.uk)) or [REDACTED] ([REDACTED] [turley.co.uk](mailto:[REDACTED]@turley.co.uk)) at our London office.

Yours sincerely,

[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED] [turley.co.uk](mailto:[REDACTED]@turley.co.uk)

Appendix 1: Detailed Responses to Consultation Questions

Question No.	Question	Response
5	<p>Do you agree with the proposed eligibility criteria for the time limited planning route? The GLA welcomes any views on whether this will, and how this better can, help to achieve the objective of increasing housing supply and supporting early delivery whilst also maximising affordable housing provision in the short term.</p>	<p>Our client does not agree with the proposed eligibility criteria for the time limited planning route.</p> <p>Regarding our Client’s Site at Park View Place, the proposed eligibility criteria for the time limited planning route has the reverse effect of assisting in achieving the objective of increasing housing supply and supporting early delivery. As a result, our client considers that site and other similar previously developed sites are included and benefit from the Time-Limited Planning Route. Furthermore, our client considers that sites released from, or proposed to be released from, Metropolitan Open Land <u>prior</u> to the publication of the draft LPG should also benefit from the Time-Limited Planning Route.</p> <p>Paragraph 4.4.5 of the draft LPG states that the time-limited planning route does not apply to sites on or released from Grey or Green Belt, with footnote 8 further specifying that these sites are subject to the NPPF Golden Rules. In line with London Plan Policy G3, MOL is afforded the same status and level of protection as Green Belt, and therefore must be subject to national planning policy tests that apply to the Green Belt.</p> <p>As set out in the accompanying letter to the response, the site lies within designated Metropolitan Open Land (MOL), however the emerging Ealing Local Plan Final Proposals proposes to de-designate the site from the MOL (LB Ealing first proposed this at Regulation 18 Consultation in November 2022). The site’s de-designation as MOL has therefore been proposed in excess of 3 years, and is supported by Interland Group, however due to the lengthy Local Plan preparation process, the site is still waiting for this to be formally adopted.</p> <p>The Local Plan Examination Hearing Session on MOL boundary changes was held on Tuesday 17th June 2025. The de-designation of the site (through the change in boundary of the MOL2 designation) was not challenged during examination, and following this LB Ealing have confirmed that they can attribute significant weight to the site’s de-designation as MOL and as such would not treat an application coming forward for the site as MOL. This view was shared by the GLA in the latest pre-application response.</p> <p>As such, under the currently adopted London Plan and accompanying guidance, the site benefits from the current London Plan Fast-track route at 35% affordable housing, and should this be met then any permission would not be subject to a late-stage viability route.</p> <p>However, should the LPG be adopted in its current form, the site would now be excluded from the fast-track route and instead be required to meet the NPPF Golden Rules for affordable housing; equating to a target of 50% affordable housing under a viability tested route (VTR) which includes a late-stage review, on the basis it is to be released from MOL.</p>

Whilst following a VTR route, which would justify a level of affordable housing below the 50% target, would not render the development undeliverable, the imposition of a late-stage review would render the development un-fundable and therefore not deliverable. This is un-fundable on the basis that lenders will not provide debt where there is large risk of increased costs and lower profit levels yet there is not opportunity if the developer succeeds as the affordable housing level will increase to negate any profit increase.

Consequently, rather than assisting the delivery of housing, in this unique instance the draft LPG would make a development of c.550 residential units and c.350 co-living (PBSL) units undeliverable at the site through its current wording.

Whilst our Client fully understands the intention behind Paragraph 4.4.5 of the draft LPG, and agrees that any strategic Green Belt release proposed in future in London should not benefit from this reduced affordable housing target within the time limited planning route, our Client urges the GLA to reconsider excluding all sites released from the MOL in the same manner.

To highlight the unique position of our Client's site at Park View Place:

- July 2016 – Pre-application discussions begin with LB Ealing and the GLA for residential redevelopment of the site
- June 2018 - Planning Application (182843FUL) submitted with the proposals following the fast-track route for affordable housing at 35%.
- January 2020 – Planning permission 182843FUL granted following the fast-track route for affordable housing at 35%. GLA and LBE conclude proposals meet the exception test (paragraph 145) of then NPPF on the basis *'it would take place wholly on previously developed land, is not considered to cause substantial harm to the openness of the MOL and delivers over 35% affordable housing by habitable room without a late-stage viability review.'*
- April 2021 – Further planning application (ref. 213378FUL) submitted following the fast-track route for affordable housing at 35%.
- February 2022 - Planning application ref. 213378FUL receives resolution to grant planning permission, with fast-track route for affordable housing at 35% without a late-stage viability review.
- November 2022 – LB Ealing propose to fully de-designate the site as MOL at Regulation 18 consultation of emerging Local Plan.
- April 2023 – Lawful Development Certificate ref. 230225CPE confirms lawful implementation of Planning permission ref. 182843FUL.
- December 2023 – Pre-application discussions commenced for current proposals (due to be submitted in Q1 2026) for c.550 residential units and c.350 co-living (PBSL) units, as previous permissions for the site are unviable.
- December 2024 - NPPF updated to introduce Golden Rules for Green belt (and therefore MOL) development to target 50% affordable housing following a FTR (with late-stage review).

-
- June 2025 – site’s de-designation as MOL gains significant weight following Ealing Local Plan EIP.
 - December 2025 – draft LPG excludes site from benefiting from future time-limited planning route and therefore must follow viability tested route including imposition of a late-stage review.

Consequently, the Site has been earmarked (and in pre-application discussions) for residential development since July 2016 and been proposed to be de-designated as MOL by Ealing since November 2022. The site is previously developed brownfield land, with an implemented planning permission for residential development with 35% affordable housing (without a late-stage viability review) and the potential to deliver a strategic contribution to LB Ealing’s housing and affordable housing need.

Instead of assisting the delivery of this stalled site which is currently unviable, by lowering the affordable housing threshold for a fast-track route, the draft LPG removes this route as an option for the site and results in the need for a late-stage review for any development, which makes the development un-fundable and therefore not deliverable.

As such, our Client does not agree with the proposed eligibility criteria for the time limited planning route, because as currently worded it has the opposite effect that it was intended for with our Client’s site and will not help to achieve the objective of increasing housing supply and supporting early delivery.

Our client therefore suggests that the eligibility of the fast-track route be amended to include previously developed brownfield sites with an extant and/or implemented planning permission for residential development that pre-dates the publication of the draft LPG, or that has been proposed to be de-designated as MOL (i.e. included within a draft Local Plan for Reg 18 or Reg 19 consultation) prior to publication of the draft LPG.

As such, we suggest Paragraph 44.5 of the draft LPG be amended as follows:

The time-limited planning route will not apply to the following:

- *Sites on or released from Grey or Green Belt or MOL (excluding previously developed brownfield sites with an extant and/or implemented planning permission for residential development that pre-dates the publication of the draft LPG, or that has been proposed to be de-designated as MOL (i.e. included within a draft Local Plan for Reg 18 or Reg 19 consultation) prior to publication of the draft LPG).*
- *Purpose Built Student Accommodation (PBSA) or Large-scale Purpose-built Shared Living (LSPBSL) (also known as co-living) development, or schemes where either of these (or together) comprise of 50 per cent or more of total scheme residential Gross Internal Area (GIA) floorspace*
- *Where a scheme involves the demolition of existing affordable housing, including estate regeneration schemes.*

A comparable position was undertaken in the ‘Threshold Approach to Affordable Housing on Public Land Practice Note July 2018’ (see Paragraph 10) which made clear the 50% affordable housing threshold for public land

sites didn't apply to sites that *'were disposed of and either have been redeveloped or were subject to a change of use prior to publication of the Mayor's Affordable Housing and Viability SPG.'*

Should the proposed wording be adopted, our Client has a funded, viable and deliverable scheme that can be submitted in Q1 2026 and delivered in line with the timescales set out within the time limited planning route.
