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## Matter 3

Vision, Objectives and  
Spatial Strategy

Ealing Local Plan

Statement prepared by  
Quod on behalf of  
Berkeley Homes  
(Southall) Limited

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15<sup>TH</sup> MAY 2025

# Matter 3: Vision, Objectives and Spatial Strategy

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- 1.1 On behalf of Berkeley Homes (Southall) Limited ('Berkeley'), Quod submits a hearing statement in respect of Matter 3: Vision, Objectives and Spatial Strategy. Our hearing statement responds to the EX16 Matters, Issues and Questions (MIQs) issued by the Inspectors on 8<sup>th</sup> April 2025.
- 1.2 This submission is cognisant of EX2 Initial Questions, dated 20<sup>th</sup> December 2024 relating to general conformity with the London Plan and planned growth, and the Council's response to questions within IQ7-IQ9 (EX3 and EX10).
- 1.3 Berkeley is the applicant for The Green Quarter, one of the borough's largest regeneration mixed use housing schemes comprising c.8,100 homes and c.17,400 sqm of commercial and community floorspace and extensive areas open space and public realm across the whole site (Phase 1-9). Our client received a resolution to grant planning permission for a revised masterplan (Phase 4-9) in November 2024 and is looking to engross the s.106 legal agreement. The Green Quarter is subject to emerging site allocation - 11SO.
- 1.4 Our client submitted representations at Regulation 18 and 19 stage of the review and continues to be engaged at Regulation 22 stage (the 'Plan').
- 1.5 Our client has not been asked to enter into a statement of common ground.

## **Matter 3 Issue – Whether the Vision and Spatial Strategy for the Borough is justified, effective, in general conformity with the London Plan, consistent with national policy and positively prepared**

- 1.6 Paragraph 33 of the 2023 Framework, which the Local Plan is assessed against, requires local plans to be reviewed no later than five years from adoption to account for changing circumstances of the area, or any relevant changes in national policy. Ealing's adopted policy is dated 2012 and 2013, and therefore this requirement has been breached, as a period of 13 years has passed.
- 1.7 We do not consider that the Plan has been positively prepared as it fails to demonstrate how it will meet the area's (previously assessed) objectively assessed housing need (benchmarked against the now dated London Plan 2021).
- 1.8 The Plan is unable to demonstrate the simplest requirement of a 5 Year Housing Land Supply (EB73). Its failure to identify and allocate sufficient sites for housing does non-conform with Paragraph 76(b) of the 2023 Framework which states *"that adopted plan identified at least a five year supply of specific, deliverable sites at the time that its examination concluded"*.
- 1.9 The Plan cannot therefore be considered to have been prepared in a positive manner consistent with national policy, and we consider that the Plan should be paused, or restarted, to undertake a more detailed review of available and deliverable sites, or failing that, a review

should be required within 24 months, to address this failure and reflect changes in regional and national policy.

- 1.10 Without direct intervention, the Plan will continue to fall short of its development needs across the plan period and will simply '*kick the can*' down the road, exacerbating the existing and future forecast housing emergency.
- 1.11 Due to beneficial timing arrangements, the Plan will be determined under the new Framework's (December 2024) transitional arrangements (Annex 1) which excludes the current Framework from applying where a Regulation 19 Local Plan was issued on or before the 12th March 2025, or where there is 'an operative' Spatial Development Strategies in place (e.g. the London Plan); despite this legislative arrangement.
- 1.12 This means that the new standard housing method will not inform this plan, but it is a material consideration.
- 1.13 We acknowledge that the Plan is required to be in 'general conformity' with the London Plan (2021), albeit the London Plan is also dated as it will not have been reviewed within 5 years of adoption (by March 2026), does not meet the housing needs of London, and does not meet the current requirement of 88,000dpa.
- 1.14 Given the severity of housing need across the borough in the backdrop of a sustained failure to identified sufficient land for housing, poor historic completions rates, it would be remis to continue to adopt a plan which do materially fails in its key objectives.

## **Q 1 – Is the Boroughwide Vision for the Plan ambitious, yet realistic, with appropriate alignment with the London Plan?**

### **Housing**

- 1.15 The Plan has aligned its housing targets within the adopted London Plan, and in doing so, proposes 21,570 homes across the 10 year plan period (2,157 homes per annum).
- 1.16 In demonstrating how it will achieve the London Plan (2021) housing target, the Council has prepared a Five Year Housing Land Supply Position Statement & Housing Trajectory (EB73 and EB73A).
- 1.17 EB73A projects an average completion of 2,603dpa (13,016 homes in total) across the five years of the Plan period. This completion figure is 26% higher than Ealing's best completion year in the last half a decade (1,994 homes completed in 2020-21), and is 58% higher than its five year average (2019-2024) at 1,535dpa. It therefore lacks credibility.
- 1.18 The substantial uplift in the projected completions rate (EB73) for the first five years is wholly unrealistic in the context of historic completions across Ealing, and even more so, when accounting for the Plan's failure to demonstrate a 5YHSL.
- 1.19 In turning to whether the Plan is ambitious, we note that the Plan has been prepared to align with the London Plan (2021) housing target, which is dated, despite the GLA using the new housing requirement of 88,000dpa as an objective target.

- 1.20 The Mayor is seeking to significantly boost housing delivery in accordance with the new standard method, as set out in the recently published (9<sup>th</sup> May 2025) '*Towards a new London Plan*' consultation document. If this is to be achieved, all London Boroughs must work together collaboratively, and it does not appear that this is taking place.
- 1.21 In order for the new Ealing Local Plan to be considered genuinely ambitious, it must align itself with the new standard method that informs the '*Towards a new London Plan*' of 3,407dpa; an increase of 1,250dpa against the Plan target.
- 1.22 We address this matter further in Matter 4.

### Southall

- 1.23 Figure SS1 'Key considerations in developing the Spatial Strategy' refers to place interventions across the borough. All town centres are identified for generally 'significant' levels of development, except Southall which is identified for "moderate levels of employment led development".
- 1.24 In response to representations on this issue, Ealing Council responded to state that the 'moderate' level of growth was informed by the evidence base and consultation, which informed a 'reasonable alternative' that has led the spatial approach to only apply 'moderate' growth to Southall. This isn't sound in our opinion and seems an inconsistent approach.
- 1.25 The Southall Opportunity Area, the only Opportunity Area in Ealing, is expected to deliver 9,000 homes and 3,000 new jobs in accordance with the London Plan (2021). Since adoption of the Southall Opportunity Area in 2011 only 875 homes<sup>1</sup> have been completed across the Opportunity Area, therefore significant housing development is expected alongside employment provision.
- 1.26 Despite this, 'Significant' levels of development are identified in other areas of the Borough, which have not benefited from comparable levels of capital investment, nor are they designated as Opportunity Areas where the London Plan expects the greatest volume of development to be directed in meeting London's housing and economic needs.
- 1.27 We consider this to be inconsistent.
- 1.28 The Green Quarter (11SO), part of the town centre, and Southall as a whole, is one of the largest site allocations where 'significant' levels of mixed use development are being promoted in reflection of the Opportunity Area designation and substantial investment following the Elizabeth Line.
- 1.29 On this basis, we do not consider that the proposed allocation of 'moderate' growth in Southall is robust, and sound.
- 1.30 We address this matter further in Matter 5.

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<sup>1</sup> <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/londons-opportunity-areas/oa-locations/southall-opportunity-area>

**Q 15 – Overall, is the spatial Strategy sound, having regard to the Borough’s assessed development needs, the requirements of national policy, and general conformity with the London Plan?**

- 1.31 The Plan cannot be considered to be sound, as it fails to demonstrate a 5YHSL as required by the Framework, and has failed to robustly evidence how it will meet the London Plan (2021) housing targets.
- 1.32 To correct its course, Plan preparation should be paused to allow the Council to undertake a further review of available and deliverable sites. This should account for the new standard method promoted via the recently published (9<sup>th</sup> May 2025) ‘*Towards a new London Plan*’ consultation document, which will increase Ealing’s housing target from 2,157dpa to 3,407dpa.
- 1.33 This will necessitate an in-depth review and likely allocation of additional development sites, alongside the optimisation of housing on available and sustainable sites of which there remain several suitable areas across the Borough including the Green Quarter, Southall.