



Quod

Matter 4

Housing

Ealing Local Plan

Statement prepared by
Quod on behalf of T R
Suterwalla & Sons Ltd
(TRS)

MAY 2025

Matter 4: Housing

- 1.1 On behalf of T R Suterwalla & Sons Ltd ('TRS'), Quod submits this hearing statement in respect of Matter 4 Housing.
- 1.2 Our hearing statement responds to EX16 Matters, Issues and Questions (MIQs) issued by the Inspectors on 8th April 2025.
- 1.3 This submission is cognisant of EX2 Initial Questions dated 20th December 2024, relating to housing, and the Council's response to questions IQ 4, 10 & 11.
- 1.4 TRS are a major landholder within the Southall Opportunity Area to which their land interests incorporate the TRS Estate, Southbridge Way, Southall.
- 1.5 Our client submitted representations at the Call for Sites and Regulation 19 stages, and continues to be engaged at Regulation 22 stage (the 'Plan').
- 1.6 The primacy of the previous consultations relates to the unsound approach taken by Ealing Council in excluding the TRS Estate as a strategic site allocation, despite the landholding presently benefitting from Site Allocation 'SOU8 – the Green' within the adopted Ealing Development Site DPD (2013) (EB2).

Matter 4 - Issue – Whether the Plan has been positively prepared and whether it is justified, based on up-to-date and reliable evidence, effective, consistent with national policy and in general conformity with the London Plan in relation to housing development management policies.

- 1.7 We do not consider that the Plan has been shaped by early, proportionate and effective engagement¹ and is not sound² as it is not effective nor justified.

Matter 4, Q1 & Q11-20 – Does the Plan accurately and clearly set out a housing target that reflects the ten-year targets for net-housing completions referred to at Policy H1(A) of the London Plan? Is the approach to setting the housing target after 2028/29 justified?

Five Year Housing Land Supply (5YHLS)

- 1.8 The Framework³ expects planning policies to identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of specific, deliverable sites for five years following the intended date of adoption.

¹ Framework (2023), paragraph 16(c)

² Framework (2023), paragraph 35

³ Framework (2023), Paragraph 69

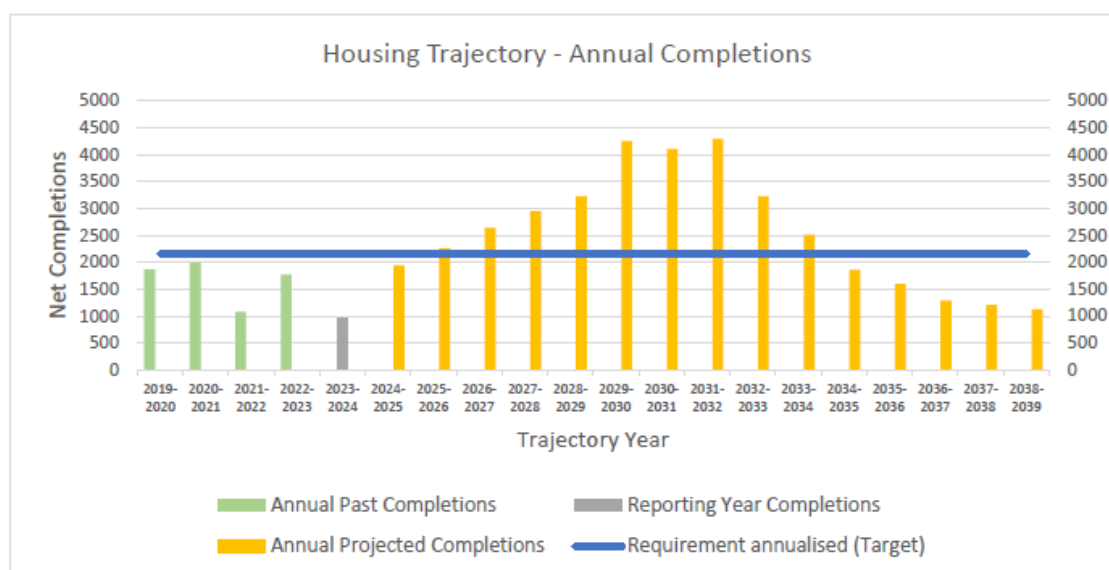
- 1.9 Despite the clear expectation set by the Framework, the Council's evidence base (EB73) demonstrates only a 3.9 year supply. This fails to conform with the Framework and, on this basis alone, the Plan should be considered unsound as it fails to meet this mandatory requirement. Preparation should be paused to allow a further site review to take place.
- 1.10 To correct this approach, the Council must consider alternative, deliverable sites that are able accommodate new homes. On this basis, the TRS Estate should be reinstated as part of the wider 'The Green 10SO' Site Allocation to reflect its sustainable location within the Southall Opportunity Area.
- 1.11 Extension of the '10SO' allocation to include the TRS Estate, as was the approach taken by the previous Development Plan, will afford greater flexibility to address other policy considerations, specifically the intensification or co-location of designated industrial land that can, in turn, support the delivery of residential uses in accordance with London Plan Policy E7.

5 Year Housing Assumptions

- 1.12 Figure 1 shows the 'Annual Housing Completions by Year (Net)' as presented in EB73. It shows annual past completions (2019-2023), projected completions (2023-2039) derived from EB73A 'Housing Trajectory', and the annualised requirement.

Figure 1 - EB73 (Extract of Figure 1 – Annual Housing Completions by Year (Net))

Figure 1 – Annual Housing Completions by Year (Net)



- 1.13 For the five year period in question (2024-2029), EB73A projects an average completion of 2,603dpa (13,016 homes in total). This 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.
- 1.14 The Housing Delivery Test (20/21 – Q1 2023) corroborates this figure with an average delivery at 1,616 dpa to which the standard method Housing Delivery Test (December 2024) (21/22-23/24) is slightly less at 1,449dpa.

- 1.15 The most recent completion data is even more stark, with the GLA London datastore⁴ recording only 134 completions for 2024/25 in Ealing. Significantly less than the projected figure of 1,944 completions as reported.
- 1.16 The significant and unprecedented increase in housing completions forecast between 2029-2032 (averaging 4,217dpa) presents obvious further concern.
- 1.17 Either way, what this shows is that the projected completions rates (EB73) for the first five years and beyond are not credible, and there is no robust evidence to support them. The Plan is therefore unsound.
- 1.18 We note further that the Council, through its new Plan has, intentionally or otherwise, made decisions that actively preclude housing from coming forward, be that its general approach to affordable housing (discussed from Paragraph 1.30) or in this case, the deallocation of deliverable sites that were previously proposed for mixed-use, residential-led redevelopment within the adopted Development Plan.
- 1.19 This is unsound in the context of the Plan, as demonstrates needing to significantly boost its housing delivery and historic completion levels.
- 1.20 In respect of the former, the Plan applies the annualised version of the 2021 London Plan target, equating to 2,157dpa over a 14 year plan period (2025-2039).
- 1.21 Whilst we recognise the transitional arrangement to which the Plan has been prepared, it would be remiss not to cite the ‘*Towards a new London Plan*’ consultation document published by the Mayor on 9th May 2025.
- 1.22 The ‘*Towards a new London Plan*’ consultation document is intends to inform the next London Plan, intended for adoption by 2027. It sets a strategic housing target of c.88,000dpa, which is derived from the Government’s standard method. For Ealing, the standard method figure is set at 3,407dpa.
- 1.23 This is significantly above the current London Plan figure to which the Plan has been prepared.
- 1.24 The implication is that on adoption of the new London Plan housing targets in 2027, the Plan will be out of date⁵, and the 6 year + projections will be materially deficient.
- 1.25 The GLA in response to other local plan reviews has made clear that it expects more than the minimum at local plan reviews:“

The Mayor considers that it is important for LBH to recognise that the LP2021 does not meet London’s identified housing need and furthermore - given the context that London is now working towards delivering 80,693 homes per annum – this means that the overall amount of housing required annually should not be expected to reduce beyond 2029”⁶

⁴ <https://data.london.gov.uk/dataset/residential-starts-dashboard>

⁵ S38(5) Planning and Compulsory Purchase Act 2004

⁶ GLA representations to the Hounslow Local Plan R19, dated 25th October 2024

- 1.26 Whilst we recognise there is currently no statutory obligation to deliver beyond the London Plan (2021) housing targets, there remains *“not only a professional responsibility but a moral obligation to see more homes built”*⁷. This Plan does not meet that national objective.
- 1.27 In order to correct its course, Ealing must either pause Plan preparation to allow a further site review to be undertaken, or commit to reviewing its housing target to align with the new London Plan (i.e. the Standard Method) and other circumstantial changes to the area within two years of adoption of the Plan.
- 1.28 The need to review its housing target and the associated deliverable sites, will necessitate an in-depth review and allocation of additional development sites, alongside the optimisation of housing on available and sustainable sites.
- 1.29 The TRS Estate should be considered as part of this, and allocated as part of the expanded ‘SO13 – The Green’ site allocation for a mixed-development including residential.

Q8 (b) – Does the evidence base support the position that there is no identified local need for shared living in Ealing, taking a restrictive approach, and limiting it to Ealing Metropolitan Town Centre?

- 1.30 Shared living is an important and rapidly growing alternative residential product which is able to actively contribute to meeting Ealing’s housing needs alongside conventional and other specialist housing types. London Plan paragraph confirms that *“All other net non-self-contained communal accommodation should count towards meeting housing targets on the basis of a 1.8:1 ratio, with one point eight bedrooms/units being counted as a single home”*.
- 1.31 In support of its approach, the Council’s evidence base (EB73) uses data from 2018 and earlier, which largely pre-dates the recent growth in the shared-living sector, and adoption of the London Plan and the Mayor of London’s LPG in February 2024.
- 1.32 EB73 makes only limited reference to shared-living (co-living) but identifies that *“Purpose built co-living could meet the needs of some single people and couples as a short-term lifestyle choice”*⁸.
- 1.33 Evidently, the expansion of the shared-living sector in recent times demonstrates there is a growing need for this type of housing across-London, which is reflective of the growth in single person households across the country. Single person households are expected to grow from 7m in 2016 to 8.8m by 2041 of which 30% of households in London will be single-person occupation by 2041⁹.
- 1.34 EB73¹⁰ corroborates this in forecasting that single person households will grow from 37,200 (2021) to 43,500 by 2041 (+6,300).

⁷ Secretary of State letter to all local authority leaders and chief executives in England, 30th July 2024

⁸ Ealing Local Housing Needs Assessment Update (November 2022)

⁹ Office for National Statistics: Household projections for England – household type projections: 2016 based.

¹⁰ Ealing Local Housing Needs Assessment Update (November 2022)

- 1.35 The Council's proposed geographical restriction of shared living housing within Ealing Metropolitan Town Centre isn't sound, because the evidence base does not indicate that need is focussed on a specific part of Ealing. It is also contrary to Policy H16 of the London Plan and negates other sustainable locations from being considered. It is therefore unjustified.
- 1.36 To remedy this issue and to ensure that shared living can be provided where there is demand (i.e. need), the policy should be revised to align with the London Plan Policy H16, which directs shared-living development to areas that are well-connected to local services and employment. The draft policy should therefore be expanded to support co-living in town centre location or in areas with high PTAL.
- 1.37 It may also be appropriate to require planning applications proposing shared living uses to be accompanied by a needs assessment to demonstrate the associated local need.