



Quod

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## **Matter 5**

Economic Development

Ealing Local Plan

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

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MAY 2025

## Matter 5: Economic Development

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- 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 8<sup>th</sup> April 2025.
- 1.3 This submission is cognisant of EX2 Initial Questions dated 20<sup>th</sup> 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. The TRS Estate sites within the wider Featherstone LSIS.
- 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 5 - Issue – Whether the Plan is justified, effective and consistent with national policy and in general conformity with the London Plan in relation to economic development.**

- 1.7 On this basis that our client was not consulted in respect of its proposed deallocation as a strategic site allocation, we do not consider that the Plan has been shaped by early, proportionate or effective engagement<sup>1</sup> and cannot therefore be considered sound<sup>2</sup>.
- 1.8 The TRS Estate was not considered as part of the Site Allocation Report or Appendices (EB102-EB105) despite its existing allocation.
- 1.9 We also raise further concerns in respect of its effectiveness and justification with the London Plan on the basis of conflicting development needs for the Borough. These are outlined in further detailed within our representation made to Matter 4: Housing.

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<sup>1</sup> Framework (2023), paragraph 16(c)

<sup>2</sup> Framework (2023), paragraph 35

## 2 (b) – Does the Spatial Strategy and the development plan as a whole set out a specific strategy for Locally Significant Industrial Sites? Is the strategy in line with the London Plan?

### Q7 (H) - In terms of the local variation to Policy E4 of the London Plan: are any other modifications needed to Policy E4 for soundness?

- 1.10 We acknowledge that Policy E4 directs LSIS intensification and consolidation to be brought forward through a masterplan process in accordance with the London Plan, to which the additional detail provided within the Draft Schedule of Suggested Minor Modifications (S24) is noted and welcomed.
- 1.11 Notwithstanding, the London Plan also advocates for Development Plans to be proactive and consider, in collaboration with the Mayor, whether LSIS could be intensified to provide additional capacity, which may support the delivery of residential uses. This process should be plan-led.
- 1.12 As set out within our Hearing Statement to Matter 4 (Housing), there is clear and demonstrable failure of the Plan to allocate sufficient, deliverable and available housing land. In the backdrop of the Plan's failure to demonstrate a 5YHLS, and the growing and unmet housing need, it is imperative that the Plan considers all available and deliverable sites to identify where additional homes could be delivered in order to be considered sound. As a minimum, this should include a review of all LSIS sites to identify whether there is scope for consolidation, intensification or indeed relocation of industrial sites for housing.
- 1.13 The Southall Regeneration Plan (EB118) supports industrial intensification in this location<sup>3</sup>.
- 1.14 The *'Towards a new London Plan'* published by the Mayor on 9<sup>th</sup> May 2025 refers explicitly to a need for further industrial intensification to optimise the potential of brownfield land, and indicates that well-connected (i.e. public transport or town centres) industrial sites could be released for housing, either through intensification and consolidation, or through land swaps with low quality Green Belt (grey belt) land that are less suited to housing.
- 1.15 The TRS Estate is consistent with the broad criteria outlined by the Mayor, specifically its highly sustainable location close to Southall town centre and proximity to the Elizabeth Line station making it favourable in the delivery of housing alongside the co-location of industrial. Its consolidated ownership, unlike the rest of the Featherstone LSIS, as noted in EB54<sup>4</sup>, lends itself favourably to future intensification or, indeed, land swaps to allow alternative uses to be brought forward.
- 1.16 The developing residential context to the south of the TRS Estate should also be recognised, which being brought forward in accordance with 'The Green' consent (215058FULR3) to which the Plan promotes the release of land within the Featherstone LSIS to support delivery.

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<sup>3</sup> EB118 – Southall Regeneration Framework (February 2024) - King Street Neighbourhood Centre focus area

<sup>4</sup> EB54 – Southall Employment Audit – Page 30