



Quod

Matter 6

Design and Amenity,
Tall Buildings, and the
Historic Environment

Ealing Local Plan

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

JULY 2025

Matter 6: Design and Amenity, Tall Buildings and the Historic Environment

- 1.1 On behalf of T R Suterwalla & Sons Ltd ('TRS'), Quod submits this hearing statement in respect of Matter 6 (Design and Amenity, Tall Buildings and the Historic Environment).
- 1.2 Our hearing statement responds to EX16 Matters, Issues and Questions (MIQs) issued by the Inspectors on 8th April 2025. This submission is cognisant of the Council's Minor Modifications (S24).
- 1.3 TRS are a major landholder within the Southall Opportunity Area to which their land interests incorporate the TRS Estate, Southbridge Way, Southall, UB2 4BY.
- 1.4 Our client submitted representations at the Call for Sites and Regulation 19 stages, and continues to be engaged at Regulation 22 stage (the 'Plan').
- 1.5 The primacy of our submission 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).

Issue [Policies DAA and D9] – Whether the Plan is justified, effective and consistent with national policy and in general conformity with the London Plan in relation to design, the historic environment, and tall buildings.

- 1.6 The policies within the Local Plan do not align with the London Plan and therefore cannot be considered sound¹, as they are neither effective nor justified.

Q2 (d) - In terms of the local variation to Policy D9 of the London Plan is the differential between the definition of a 'tall building' contained in Policy D9 of the London Plan and the measurements which are referred to in criterion E and specified in Table DMP1 justified and in general conformity with that adopted strategic plan?

- 1.7 The key issue with the local variation to Policy D9 is that it does not align with the character-led, evidence-based approach supported by EB44, which identifies several appropriate tall building locations across the Borough (Figure 1-1) with recommendations for suitable building heights.
- 1.8 Instead of applying this spatially to the identified locations, the Local Plan has applied this to Development Sites only with the remainder of the Borough subject to varying definitions of 'tall buildings' based on the neighbourhood areas across the borough's six towns. This is largely

¹ Framework (2023), paragraph 35

restricted to 6 storeys (or 21 metres) across much of the Borough with limited instances of this being exceeded.

1.9 The applied definition of tall buildings does also not align with London Plan D9(A), which establishes tall building as not less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey (e.g. 7 storeys).

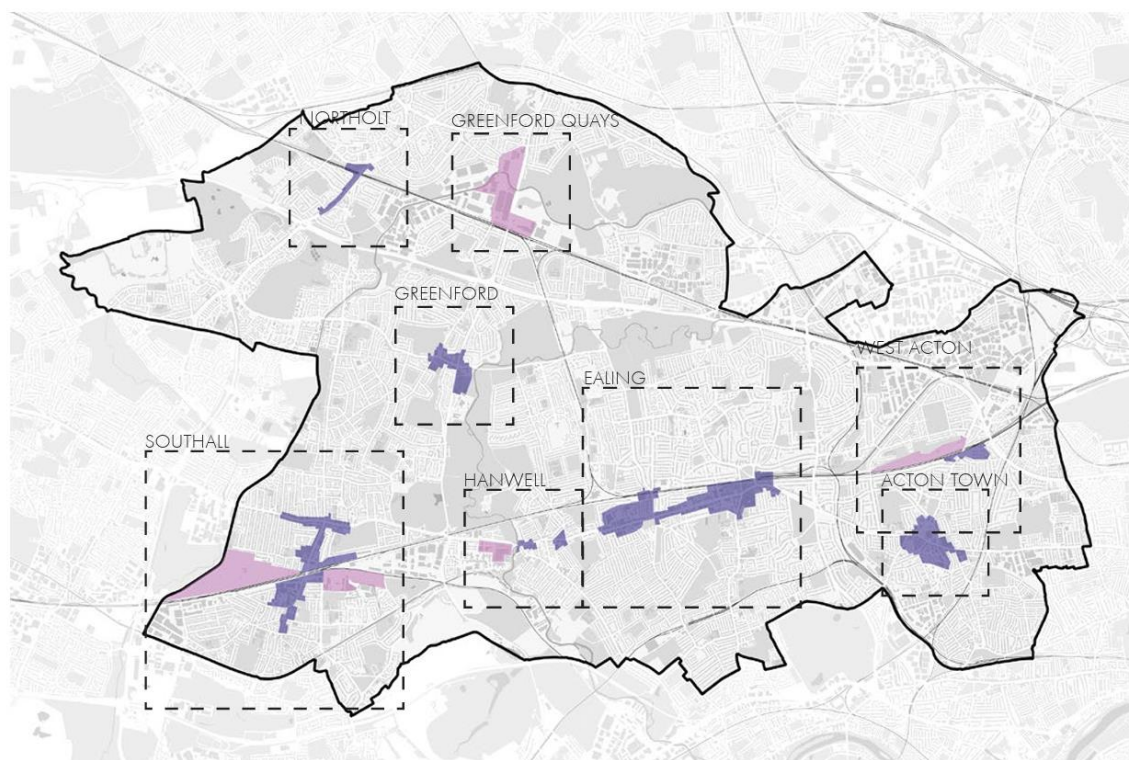
1.10 This approach is contrary to Paragraph 3.9.2 of the London Plan, which expects:

“Boroughs should determine and identify locations where tall buildings may be an appropriate form of development by undertaking the steps below: 1. based on the areas identified for growth as part of Policy D1 London’s form, character and capacity for growth, undertake a sieving exercise by assessing potential visual and cumulative impacts to consider whether there are locations where tall buildings could have a role in contributing to the emerging character and vision for a place 2. in these locations, determine the maximum height that could be acceptable 3. identify these locations and heights on maps in Development Plans.”

1.11 The approach taken by the local variation to Policy D9 is therefore inconsistent with the London Plan and largely ignores the representation submitted by the Mayor to the Regulation 19 Local Plan who confirmed *“the proposed approach does not currently meet the requirements of Policy D9 of the LP2021 and this should be addressed”*.

1.12 The policy should therefore be revised.

Figure 1-1 - EB44: Appropriate locations for tall buildings in Ealing



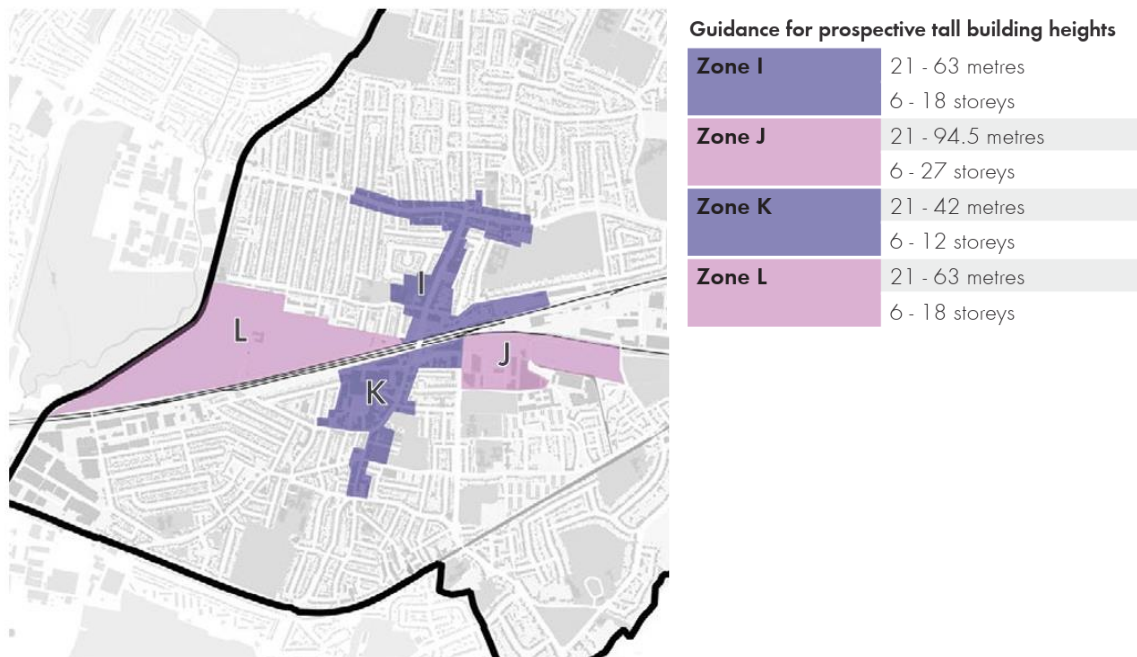
Appropriate locations for tall buildings in Ealing

- Appropriate location
- Appropriate location with character changing potential

Q2 (f) – In terms of the local variation to Policy D9 of the London Plan is the local approach to defining parameters for tall buildings across the Borough consistent with the evidence base.

- 1.13 The character and context-led methodology adopted by the Tall Buildings Study (EB44) aligns itself with the approach endorsed by the London Plan². This analysis resulted in seven defined geographical zones being identified as ‘*appropriate locations*’ for tall buildings. EB45 refers to these locations as ‘clusters’, which better aligns with the approach recommended by the London Plan.
- 1.14 These locations are geographically more refined than the broader neighbourhood areas applied by Policy D9 and supporting Table DMP1 and Figure DMP1. This has resulted in reduced tall building thresholds being applied, skewing the definition toward the lower end of the height ranges recommended by EB44. We do not consider this to be consistent with the London Plan or the evidence base.
- 1.15 For instance, EB44 identifies four appropriate tall building zones in Southall (Zones I to L) recommending building heights up to 27 storeys (Figure 1-2).
- 1.16 Instead, the Local Plan has maintained its neighbourhood area approach with Areas S2, S6, and S9 (Figure 1-3) uniformly defining tall buildings as six storeys in height³.
- 1.17 This approach does not reflect the tall building cluster that has emerged around the Elizabeth Line Station in recent years, or several of the Development Sites identified across Areas S2, S6 or S9.

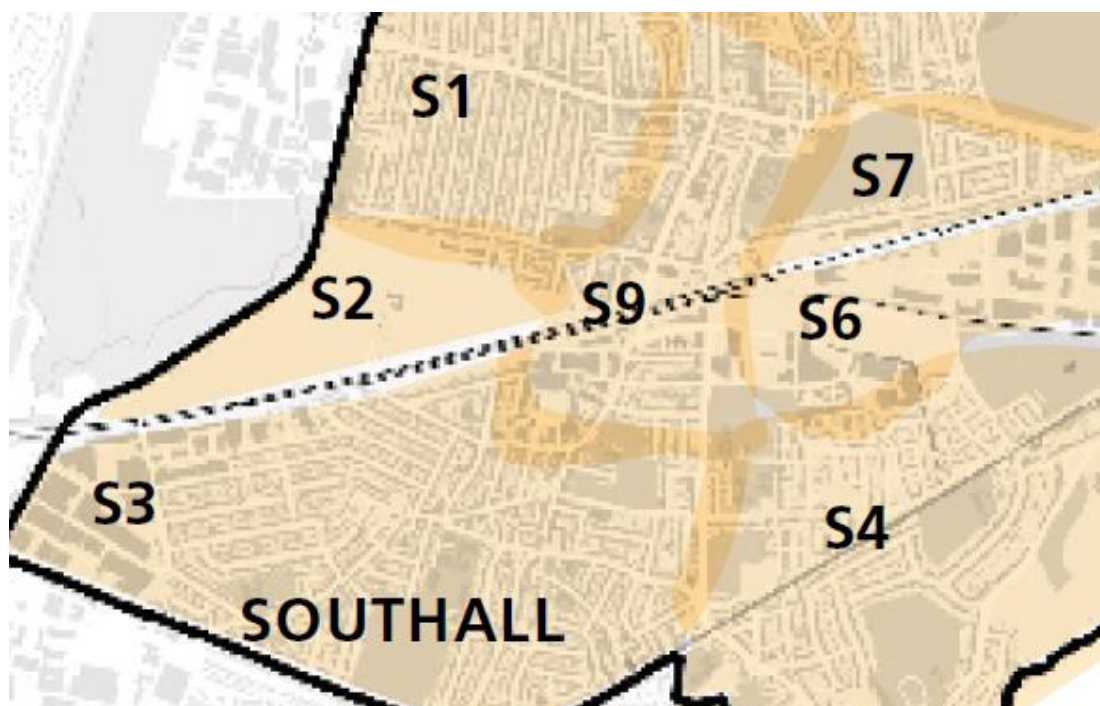
Figure 1-2 - EB44 - Appropriate locations for tall buildings (Southall)



² London Plan (2021) – Paragraph 3.9.2

³ Figure DMP1

Figure 1-3 – Local Plan Figure DMP1 (Extract of Southall Town Areas)



- 1.18 The TRS Estate lies within Area S9 (Southall Town Centre) which encompasses Development Sites 07SO (13-19 The Green) and 10SO (The Green), and land to the north of railway line.
- 1.19 As previously stated, the TRS Estate and Development Site 10SO formed the adopted Site Allocation 'SOU8 – the Green' within the adopted Ealing Development Site DPD (EB2).
- 1.20 EB45B identifies 07SO⁴ and 10SO⁵ as an appropriate tall building locations of low sensitivity and high suitability to which the tall building analysis for Development Site 07SO and 10SO confirms that buildings up to 18 storeys are considered appropriate with the supporting tall building text stating that *“Design analysis indicates an appropriate height of up to 18 storeys (63 metres)”*.⁶
- 1.21 Evidently there has been limited design analysis undertaken for this part of Southall, to which it appears that appropriate heights for 10SO have been informed by the extant planning permission, which is artificially restricted by the Civil Aviation Authority (CAA) maximum building height limitations for Heathrow Airport, as opposed to urban design considerations such as heritage, townscape or impacts on amenity.
- 1.22 The limitation of the CAA for Heathrow is recognised within the Committee Report for The Green stating that *“site analysis including consideration of the site conditions, neighbouring impacts in particular the Heathrow flightpath and from adjacent industrial uses, HTVIA, DRP and related policy, it was concluded that the site represents an appropriate location for tall*

⁴ Study Site SO10

⁵ Study Site SO13

⁶ S24 - Schedule of Suggested Modifications, November 2024 – SMM114 and SMM117

development....Options to distribute greater height were not pursued given the impact on the Heathrow flightpath”⁷.

- 1.23 The effect of the CAA limitation is recognised by the Council in their Minor Modification SMM118⁸ made Development Site 11SO.
- 1.24 A similar modification should be made to Development Site 10SO, which should go further to account for a scenario whereby the CAA limitations are revised (increased) to which there is scope for buildings of greater height to come forward in this part of Southall. This principle should extend to the TRS Estate.
- 1.25 On this basis, it is unclear why a 6-storey tall building definition is considered appropriate across Area S9, given it is significantly lower than the emerging context, as informed by the supporting evidence base and corroborated by Development Sites 07SO and 10SO.
- 1.26 The TRS Estate, which sits directly to the north-east of 10SO Development Site benefits from similar characteristics, and as demonstrated by Figure 1-4 is less sensitive to tall buildings and significantly less constrained by virtue of its own dedicated access and boundary with the railway line to the north.
- 1.27 The TRS Estate should therefore benefit from the 18-storey building height defined as appropriate for the adjacent Development Sites with the requested flexibility applied to the CAA limitations, and we would recommend that the boundary of 10SO is extended to include the TRS Estate land in accordance with adopted Site Allocation ‘SOU8 – the Green’.
- 1.28 The Council Minor Modification (S24) supports the principle that LSIS sites being potentially suitable for tall buildings⁹. This position is supported and should be applied to TRS Estate site.

⁷ Planning Committee Report (20/10/2021), Schedule Item 1, Page 22

⁸ S24 - Schedule of Suggested Modifications, November 2024

⁹ S24 – SMM154

Figure 1 4: EB45B - 07SO and 10SO Tall Building Analysis

