



Quod

Matter 8

Town Plans

Ealing Local Plan

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

JULY 2025

Matter 8: Town Plans

- 1.1 On behalf of T R Suterwalla & Sons Ltd ('TRS'), Quod submits this hearing statement in respect of Matter 8 (Town Plans).
- 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.
- 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' in the adopted Ealing Development Site DPD (2013) (EB2).

Q2 – Will the Spatial Strategy and policies for each Town be effective in addressing the issues and capitalising on the opportunities of each place in a way that supports the delivery of sustainable development, clearly setting out deliverables planning related policy expectations and/or proposals in a manner which gives certainty in future decision taking in the Borough?

- 1.6 We strongly endorse Policy S1(L)(iv) which supports co-location of housing upon the Featherstone Locally Significant Industrial Site (LSIS), where a no-net loss of industrial floorspace is sustained. This is supported by the Southall Regeneration Plan (EB118) and the 'Towards a new London Plan' (May 2025) which promotes industrial intensification and suggests that well-connected industrial land may be suitable for housing through consolidation or land swaps with underutilised Green Belt (grey belt) land.
- 1.7 In view of the masterplan expectation, we strongly recommend that the TRS Estate is subsumed within Development SO10 (The Green). This would align with adopted Site Allocation 'SOU8 – the Green', and would ensure greater flexibility to deliver a comprehensive mixed-use masterplan across the combined site, unlocking several key benefits:
 - Consolidating existing industrial floorspace across the Dominion, Featherstone, and TRS Industrial Sites would enable a more efficient, intensified employment cluster. This would allow industrial operations to function from a single point of access, reducing conflict with surrounding uses with more efficient servicing and reduced congestion.
 - Relocating and consolidating the industrial floorspace would create development parcels better suited to accommodating a mixed-use masterplan.
 - As identified in EB45B, the TRS Estate is less sensitive from a townscape perspective than the wider 10SO site. Therefore it is better able to accommodate taller residential

buildings which should unlock greater values that can be used to fund replacement industrial floorspace, generating better employment outputs for Southall.

- Focusing residential development in the north and eastern parts of the site would align with the spatial strategy by placing homes within close proximity to Southall Station and the Town Centre, thereby supporting sustainability principles and housing delivery for Southall and the Borough.
- As part of the wider masterplan, there is an opportunity for an improved entrance from Southbridge Way enhancing the overall appearance, permeability, and legibility of the area, and contributing positively to the place-making objectives.
- The consolidated ownership of the TRS Estate provides greater certainty over future delivery of a comprehensive masterplan.

- 1.8 We raise significant concerns with the Spatial Strategy presented at Figure SS1 of the Local Plan, particularly the designation of Southall for only *‘moderate levels of employment-led development in Southall’*. This position is justified by the Council on the basis that *“the pace of new homes provision has been rapid. However, this has not been accompanied by a similar increase in the amount of employment space and new jobs”¹*, yet, this assertion is not supported by the evidence base.
- 1.9 Southall is a highly accessible location served by the Elizabeth Line and designated as an Opportunity Area in the London Plan, which identifies it for *‘high’* residential growth². The London Plan expects the Southall Opportunity Area to deliver at least 9,000 new homes and 3,000 jobs³.
- 1.10 Since 2019, the Southall Opportunity Area has delivered just 750 homes⁴, a fraction of its 9,000 homes target.
- 1.11 By contrast, employment growth has significantly exceeded expectations with the Local Plan itself reporting a 20% increase in businesses⁵ within Southall, which supports over 20,600 jobs⁶. An uplift of approximately 4,000 new jobs since 2019.
- 1.12 This undermines the Council’s rationale for prioritising employment-led growth in Southall. The data shows that housing delivery, not employment, has lagged behind, and the Local Plan’s current approach is inconsistent with both the evidence base and the objectives of the London Plan, which remains clear in its direction that Opportunity Areas should optimise residential output.
- 1.13 Accordingly, we consider that the Spatial Strategy (SS1) and Policy S1 should be revised to rebalance the policy emphasis, reinstating housing delivery as a central objective for Southall alongside continued employment growth. This dual approach aligns with the London Plan’s

¹ Local Plan – Paragraph 4.7.9

² London Plan – Table A1.1

³ London Plan – Table 2.1

⁴ Question to the Mayor (21st November 2024) – Table 1

⁵ Local Plan – Paragraph 4.7.27

⁶ Southall Regeneration Framework (EB118)

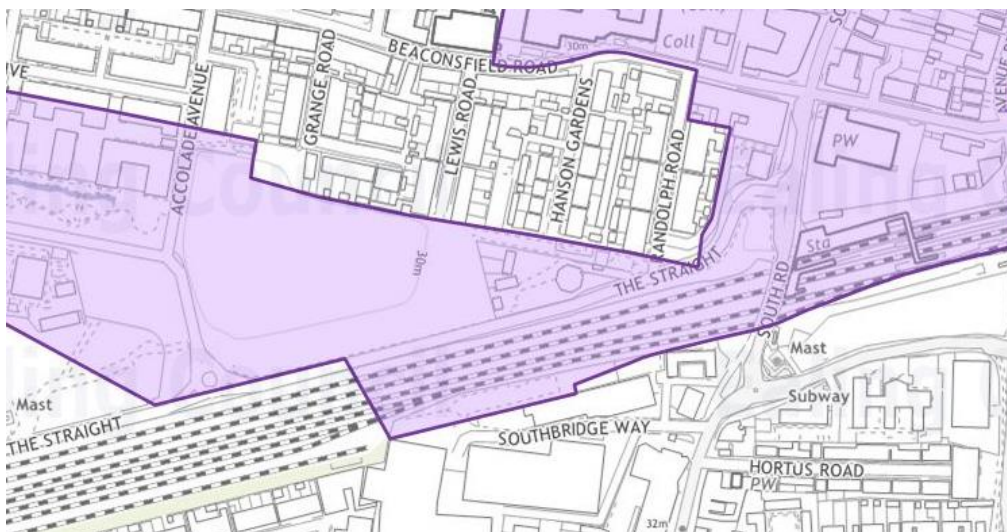
emphasis on realising the full regeneration and growth potential of the Southall Opportunity Areas.

- 1.14 In achieving this, the Local Plan should better recognise the potential to intensify, co-locate, and consolidate Southall's 428,269 sqm of industrial land⁷, which could support significantly higher employment densities whilst providing additional capacity for the delivery of new housing.
- 1.15 Southall's existing industrial sites currently support an average employment density of 70 jobs per hectare. This can be increased through a masterplan-led redevelopment that enables capital investment to deliver new modern, higher-density employment space in conjunction with new homes.
- 1.16 Sites such as the TRS Estate are prime examples of locations where this could be achieved, with the potential to provide the dual benefit of intensified and modernised employment use and much-needed housing supply through co-location as supported by Policy S1(L)(iv).

Q5 – Are the boundaries of all town centres clearly defined, including any proposed alternations? Where alterations are proposed are they supported by evidence in development capacity assessments and town centre health checks and subject to assessment of retail impact? Taken as a whole, is the Pan clear about the applicable policies that will apply in different centres?

- 1.17 The extension of the Southall's Major Town Centre designation onto part of the TRS Estate to the north of Southbridge Way (Figure 1-1) should be removed given the spatial disconnect between this land and the Town Centre to the north, primarily as a result of the railway line but also given the lack of public access.

Figure 1-1 - Regulation 19 Policies Map - Town Centre designation (S18)



⁷ EB54 – Page 12

Q34(e) – In terms of Policy S1, how will the policies in the Plan make an effective contribution to fully realising the growth and regeneration potential of the Southall Opportunity Area.

- 1.18 The Local Plan fails to demonstrate how Southall will meet its strategic housing target as required by the London Plan (2021). Nor does it set out a coherent or deliverable strategy to genuinely unlock the full regeneration and growth potential of the Southall Opportunity Area.
- 1.19 To ensure soundness and consistency with the London Plan, Policy S1 must be revised to explicitly reflect the minimum strategic capacity of 9,000 homes and 3,000 jobs for the Southall Opportunity Area.
- 1.20 This is essential to acknowledge Southall's strategic role in accommodating London's housing and employment growth, particularly in light of the substantial investment in infrastructure via the Elizabeth Line, and the Borough's intensifying demand for new housing.

Q34 (k) - Taken as a whole, is the Plan in general conformity with the London Plan in relation to the Southall Opportunity Area?

- 1.21 Policy S1 is not in conformity with the London Plan as it does not support the level of housing growth expected to come forward within the Southall Opportunity Area.
- 1.22 London Plan Policy SD1(B), requires Development Plans to “*clearly set out how they will encourage and deliver the growth potential of Opportunity Areas*” to which Policy H1(B)(c) expects Boroughs to “*enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA*”.
- 1.23 Instead, the Local Plan seeks to prioritise employment-led growth in Southall despite the Council's own evidence indicating that the employment growth has significantly outpaced housing delivery and may have met or, indeed, exceeded the Opportunity Area target of 3,000 new jobs.