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# Matter 8

Town Plans

Ealing Local Plan

Statement prepared by  
Quod on behalf of  
Berkeley Homes

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10<sup>TH</sup> JULY 2025



## Matter 8: Town Plans

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- 1.1 On behalf of Berkeley Homes, Quod submits a 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 8<sup>th</sup> April 2025. This submission is cognisant of the Council's Minor Modifications (S24), and the matters discussed during the Block 1 Hearing sessions held in June 2025.
- 1.3 Berkeley Homes 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 working towards engrossment of the legal agreement.
- 1.4 The Green Quarter is subject to emerging site allocation reference '11SO'.
- 1.5 Our client submitted representations at Regulation 18 and 19 stage of the review and continues to be engaged at Regulation 22 stage (the 'Plan').

### **Issue – Whether the Town Plans are justified, effective, in general conformity with the London Plan, consistent with national policy and positively prepared.**

- 1.6 We previously raised significant concerns as part of our Hearing Statements on Matters 3 and 5 regarding the Local Plan's proposed approach to Southall Town.
- 1.7 We do not repeat the full detail of our earlier representations including those made directly to you during Block 1 at the Examination in Public. Instead, we summarise our key concerns as follows:
  - 1.7.1 The designation of Southall Town Centre for '*moderate levels of employment-led development*' is inconsistent with its status as an Opportunity Area as designated by the Mayor of London, which anticipates significant growth in new housing (9,000 new homes) and employment (3,000 new jobs), and Table A1.1 'Town Centre network' of the London Plan which designates Southall as a Major Town Centre for 'medium commercial growth' and 'high residential' growth
  - 1.7.2 This approach is inconsistent with The Green Quarter (Site 11SO), a strategic development site forming part of Southall's extended town centre, which has planning permission for, and is being delivered, as a substantial residential-led, mixed-use development of c.8,100 homes and c.17,400sqm of commercial and community floorspace and will continue to do so throughout and beyond the Local Plan period.



**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?**

- 1.8 The Spatial Strategy (Figure SS1) identifies ‘*moderate levels of employment-led development in Southall*’ will be supported within Southall to rebalance growth, to which the Local Plan states 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*”<sup>1</sup>.
- 1.9 The Local Plan states that since 2015, Southall has experienced a 20% growth in businesses<sup>2</sup>, reported as the largest increase across all of Ealing’s Towns.
- 1.10 The Southall Regeneration Framework (EB118) identifies the area as accommodating 20,600<sup>3</sup> existing jobs across 2,900 business, which based on the 20% growth reported by the Local Plan indicates the area may have benefitted from in excess of 4,000 new jobs since 2015.
- 1.11 This notably exceeds the 3,000 new jobs target for the Southall Opportunity Area set by the Mayor<sup>4</sup>, and significantly outpaces the 750 homes<sup>5</sup> delivered across the Southall Opportunity Area since 2019. This represents just 8.3% of the strategic target for new homes which does not correlate with the suggested ‘rapid’ pace of new homes.
- 1.12 Given Southall’s favourable performance in job creation in recent times, and proportionality the best performing across the whole Borough, it is unclear why the Strategic Strategy for Southall (Figure SS1) and associated Southall Town policies seek to rebalance new housing in favour of employment growth given the evidence suggests a potential over-delivery of jobs compared to housing. The extensive supply of protected Strategic and Locally Significant Industrial Sites will maintain this position.
- 1.13 Southall’s industrial areas accommodate 428,269sqm<sup>6</sup> of employment floorspace with an average employment density at 70 employees per hectare. Much of Southall’s employment land<sup>7</sup> benefits from policy protection against redevelopment for non-employment uses through the London Plan (Policy E5) and the Local Plan (Policy E4).
- 1.14 Southall is a highly accessible location, designated in the London Plan for high residential growth, making the most of its excellent accessibility. The Ealing plan should positively embrace policies for increased housing, rather than curtail them through ‘*moderate*’ employment growth. The Spatial Strategy and Southall Town policies should encourage

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<sup>1</sup> Local Plan – Paragraph 4.7.9

<sup>2</sup> Local Plan – Paragraph 4.7.27

<sup>3</sup> EB118 – Page 2

<sup>4</sup> London Plan – Table 2.1 ‘Opportunity Area Indicative capacity for new homes and jobs’

<sup>5</sup> Question to the Mayor (21st November 2024) – Table 1

<sup>6</sup> EB54 – Page 12

<sup>7</sup> 369,600sqm - EB54 - Southall Employment Audit (June 2022)



greater intensification and better quality job creation within the existing and protected employment sites.

- 1.15 This approach is compatible with the Mayor's aspiration to optimise housing delivery alongside jobs within the Southall Opportunity Area.

**Q4 – Are the key Infrastructure Delivery Schedules for each Town justified by and consistent with the evidence base, including where critical infrastructure is needed to support the delivery of individual allocations?**

- 1.16 The Infrastructure Delivery Plan: Part One (EB83) and the supporting Infrastructure Delivery Schedule – IDP Part Two (EB84) collectively set out the infrastructure required to support planned growth across the borough in accordance with the Local Plan's spatial strategy. These documents are intended to inform the development management process, underpin the development of Ealing's Community Infrastructure Levy (CIL) Charging Schedule, and guide negotiations for developer contributions<sup>8</sup>.

- 1.17 In relation to Southall, EB83 identifies the following key infrastructure requirements:

1.17.1 Expansion of secondary school capacity;

1.17.2 Addressing deficiencies in sports and leisure facilities, specifically a swimming pool, sports courts, and sports halls;

1.17.3 Provision of additional primary healthcare facilities, with existing services operating above capacity;

1.17.4 Improvements to public transport provision in certain areas; and

1.17.5 Mitigation of open space deficiency in the western part of Southall.

- 1.18 The Plan asserts that infrastructure requirements have been derived through engagement with relevant infrastructure providers<sup>9</sup> once strategic sites proposed for allocation were identified.

- 1.19 Despite this, a large number of the infrastructure projects identified in the Infrastructure Delivery Schedule (EB84) are absent of estimated costing or in the case of Piccadilly Line fleet replacement and signalling enhancement and the Heathrow airport new southern rail access<sup>10</sup> cannot realistically be funded through developer contributions alone. This is contrary to the Viability PPG<sup>11</sup>, and raises fundamental concerns over the soundness of the Local Plan's evidence base.

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<sup>8</sup> EB83 – Page 1

<sup>9</sup> EB84 – Page 4

<sup>10</sup> EB84 – Page 39: Piccadilly Line fleet replacement and signalling enhancement = £5,500,000,000; Heathrow airport new southern rail access = £1,300,000,000.

<sup>11</sup> Community Infrastructure Levy PPG - Paragraph: 017 Reference ID: 25-017-20190901



- 1.20 For the Local Plan to deliver the infrastructure that each Town needs, it must first establish whether such infrastructure is viable and therefore deliverable through the Local Plan.
- 1.21 Despite The Green Quarter (SO11) being identified by EB83 as a delivery vehicle for three major infrastructure projects with a combined value exceeding £91 million (as per EB84), Berkeley Homes has not been engaged by the Council regarding the specific infrastructure needed to support the site's delivery. This undermines the assertion that infrastructure planning has been co-ordinated with the delivery expectations of allocated strategic sites.
- 1.22 The infrastructure projects identified within EB83 have been informed via the borough-wide housing delivery of 41,571<sup>12</sup> homes over the plan period, with 15,254 of those homes anticipated to be delivered in Southall.
- 1.23 As set out in our Matter 4 Hearing Statement<sup>13</sup>, we raise concerns about the Council's housing trajectory being overly optimistic and reliant on unprecedented rates of delivery. As the projected housing delivery figures largely inform the Local Plan's infrastructure needs, this directly impacts the credibility of the Infrastructure Delivery Schedule.
- 1.24 We have also raised concerns over the robustness of the Local Plan Viability Assessment (EB120), which underpins both the Local Plan and the draft CIL Charging Schedule citing several technical failures, methodological inconsistencies and non-compliance with the Viability PPG<sup>14</sup> which raise multiple questions over the soundness of the evidence base.
- 1.25 The Infrastructure Delivery Schedule (IDS) and the future adoption of a CIL Charging Schedule are intrinsically linked, with many of the infrastructure projects identified in the IDS expected to be funded wholly or in part through future CIL receipts.
- 1.26 Given the current uncertainty surrounding the future adoption of the CIL Charging Schedule, the deliverability of the infrastructure projects identified within EB84 that are required to support planned growth across each town, including Southall, is uncertain.
- 1.27 This undermines the effectiveness of the Local Plan and places it in direct conflict with Paragraph 35 of the Framework that requires Local Plans to be justified, effective, and ultimately deliverable.

**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.**

- 1.28 To ensure consistency with the London Plan, Policy S1 must reflect the minimum capacity of 9,000 homes and 3,000 jobs, reflecting Southall's strategic importance in accommodating London's growing housing and employment needs and the significant capital investment via the Elizabeth Line.

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<sup>12</sup> EB84 - Table 2

<sup>13</sup> Paragraph 1.16-1.19

<sup>14</sup> Hearing Statement Matter 4 – Paragraph 1.44



- 1.29 However, Policy S1 makes no reference to Southall's designation as an Opportunity Area. This is not sound. The area is performing favourably in terms of job growth, but poorly in terms of housing delivery, significantly below the 9,000 homes target. Low housing delivery is further compounded by the recent lapse of the Quayside Quarter and Middlesex Business Park (S011) planning permissions, which are both included in the Council's Housing Trajectory (EB73A) for 1,997 and 1,216 homes respectively. The former Quayside Quarter site recently secured resolution to grant for an industrial-led scheme.
- 1.30 The draft Spatial Strategy for Southall does not adequately promote new housing in a manner consistent with the growth expectations of the Opportunity Area; nor recognise that additional capacity could be achieved through revisions to CAA height limitations in the future.
- 1.31 This constraint to development is compounded by the Council's inflexible tall building Policy D9, which does not align with the significant growth potential of the Opportunity Area.
- 1.32 The Local Plan fails to demonstrate how Southall will meet its strategic housing target required by the London Plan (2021), nor can it be considered to genuinely seek to unlock the full regeneration and growth potential of Southall.
- 1.33 The approach taken is unsound, and conflicts with the London Plan's expectation for the Southall Opportunity Area.

**Q34(e) – In terms of Policy S1, paying regard to Policy H1(B)(c) of the London Plan, how does the development plan enable the delivery of housing capacity identified in the Opportunity Area?**

- 1.34 To ensure consistency with the London Plan, S1 must reflect the minimum capacity of 9,000 homes and 3,000 jobs, reflecting Southall's strategic importance in accommodating London's growing housing and employment needs and the significant capital investment via the Elizabeth Line.
- 1.35 However, Policy S1 makes no reference to Southall's designation as an Opportunity Area. This is not sound. The area is doing well in terms of job growth, but poorly in terms of housing delivery, well below the 9,000 capacity. This will be compounded by the recent Quayside Quarter permission changing use to industrial / a data centre, and recent expiry of Middlesex Business Centre permission, albeit both sites remain (incorrectly) in the Council's Housing Trajectory (EB73A) for 1,997 homes and 1,216 homes respectively.
- 1.36 The draft Spatial Strategy for Southall does not adequately promote new housing; does not promote either the growth expectations of the Opportunity Area; nor recognise that additional capacity could be achieved through revisions to CAA height limitations in the future.
- 1.37 This constraint to development is compounded by the Council's inflexible tall building Policy D9, which does not align with the significant growth potential of the Opportunity Area.
- 1.38 The Local Plan fails to demonstrate how Southall will meet its strategic housing target required by the London Plan (2021), and unlock the full regeneration and growth potential of Southall.



- 1.39 The approach taken is unsound, and conflicts with the London Plan's expectation for the Southall Opportunity Area.

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

- 1.40 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.
- 1.41 London Plan Policy H1(B)(c) expects Boroughs to “*enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA*”.
- 1.42 Instead, it seeks to optimise employment-led growth despite the Council's evidence base demonstrating that the Opportunity Area target for 3,000 new jobs has likely been met and exceeded.
- 1.43 The proposed spatial transition from residential-led to employment-led growth across the Opportunity Area conflicts with this principle, and in view of the significant shortfall of housing delivery against the London Plan target and across the Borough more generally, it cannot be considered justified nor sound.

**Q35 (b) – In terms of Policy S2, is the intended effect on and relationship with the Green Quarter development clear?**

- 1.44 The extension of the Southall's Major Town Centre designation into The Green Quarter (Phase 1 and 2) is referenced within Policy S4 (West Southall) and this should be replicated by Policy S2 to avoid any ambiguity.
- 1.45 We note and welcome the proposed modification (SMM105) within the Council's Schedule of Suggested Modification (S24) but recommend that Policy S2 is updated to make clear the type of commercial uses that are expected to be delivered across the extended Town Centre, which should align with the extant The Green Quarter permission, to limit any undue effect on the viability and vitality of the exiting Southall Town Centre.