



Quod

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# Matter 9

Development Sites

Ealing Local Plan

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

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JULY 2025

## Matter 9: Development Sites

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- 1.1 On behalf of T R Suterwalla & Sons Ltd ('TRS'), Quod submits this hearing statement in respect of Matter 9 (Development Sites).
- 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).
- 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' within the adopted Ealing Development Site DPD (2013) (EB2).

### **Issue – Whether the development sites proposed for allocation in the plan are justified, effective, in general conformity with the London Plan, consistent with national policy and positively prepared.**

- 1.6 The effective deallocation of the TRS Estate as a strategic site allocation was not subject to direct consultation with our client, the landowner, and in absence of such engagement, we do not consider the Plan to have been shaped by early, proportionate, or effective consultation, and is therefore contrary to the requirements of the Framework.
- 1.7 The TRS Estate was not assessed as part of the initial Site Allocation Report (EB105), despite it being an allocated for a mixed use development including protection of existing industrial uses within the adopted Development Site DPD (2013). This represents a fundamental procedural oversight.
- 1.8 The exclusion is also inconsistent with Policy S1, Part I(iv) of the draft Local Plan, which supports the co-location of housing on Locally Significant Industrial Sites (LSIS) through masterplan-led approaches.
- 1.9 In light of the above, we consider it both justified and appropriate for Development Site 10SO ('The Green') to be extended to include the TRS Estate. This would support a more comprehensive and coordinated redevelopment, consistent with adopted Site Allocation 'SOU8 – The Green'.

- 1.10 As set out in our Hearing Statement for Matter 8<sup>1</sup>, the two sites are complementary in character and form a logical development parcel. A unified masterplan approach would enhance deliverability, enhanced placemaking opportunity, and deliver a greater quantum of development to ensure that the land in question is suitably optimised to support Southall's Opportunity Area ambitions and the Borough's wider needs.

**Q3 – For effectiveness, is it clear how a decision maker should respond to the contextual considerations and design principles for each development site and the overarching principles? Is modification needed to clarify policy from guidance?**

- 1.11 It is imperative that flexibility is applied across all Development Site, and throughout the Local Plan more generally, to ensure that it can respond to the changing needs of the Borough and London.
- 1.12 This is particularly important in view of the 'Towards new London Plan' that is expected to increase housing targets alongside other changes to strategic policies.

**Q10 – Site Specific Questions (10SO The Green)**

**a) The background and how it was identified;**

- 1.13 Development Site 10SO benefits from an adopted Site Allocation 'SOU8 – the Green' within the adopted Ealing Development Site DPD (2013) (EB2), which also extends to include the TRS Estate. Adopted Site Allocation 'SOU8 – the Green' is shown at Figure 1-1.

Figure 1-1 – Adopted Site Allocation: SOU8 The Green (EB2)

**SOU8 The Green**

**The Green / Featherstone Road / Dominion Road Southall UB2**



**Site Area:** 8.30ha

**Ownership:** Private, some Council

**Current Use:** Retail, commercial, community, Dominion Arts Centre, light industrial and industrial, warehousing, surface level car park.

**Development Strategy Policies:** 1.2(b), 2.8, particularly 2.8(b) and 2.8(c)

**Setting:** Urban

**PTAL:** 2-4

**Planning Designations:**

Southall Opportunity Area

Neighbourhood Centre

Setting of Grade II Listed Manor House

**Relevant Planning Applications:** P/2005/4387 Phoenix House

- 1.14 In both the Regulation 18 Site Selection Report (EB105)<sup>2</sup> and the Regulation 19 Site Selection Report Appendix E (EB104), the Green site is assessed with reference to its status as an existing site allocation (SOU8).

<sup>1</sup> Para 1.18

<sup>2</sup> SO13 – The Green

- 1.15 Despite forming part of the same adopted site allocation, the TRS Estate was not included in the initial Regulation 18 site selection process (EB105). This omission is a clear inconsistency in the site assessment methodology and undermines the plan's evidence base.
- 1.16 The failure to engage with our client in respect of the proposed deletion of this existing site allocation, despite its long-standing designation, demonstrates a lack of early, proportionate, and effective engagement. This procedural shortfall conflicts with the requirements of paragraph 16(c) of the NPPF and renders the Plan unsound.
- 1.17 While the TRS Estate (Site Ref. CFS25) was later considered at Regulation 19 Stage (EB104<sup>3</sup>) following our client's Call for Sites submission, it was ultimately discounted on the basis of its LSIS designation. The applied rationale is however inconsistent with the approach taken by the Council for Site Allocation 10SO, which proposes the deletion of part of the Featherstone Terrace LSIS<sup>4</sup> to facilitate redevelopment of the Site Allocation. Indeed, the adopted Site Allocation makes allowance for the protection of LSIS land and associated industrial uses.
- 1.18 Whilst we understand the strategic intent in protecting existing industrial sites, we maintain that the TRS Estate should have been properly assessed during the Regulation 18 stage given its status within the adopted Site Allocation (SOU8).
- 1.19 At a minimum, the site should have been considered for part-release, consolidation, or industrial intensification, particularly in the context of Development Site 10SO supporting a mixed-use development.

### **c) How the boundaries and extent of the site have been defined and justified;**

- 1.20 The current boundaries of Development Site 10SO have been drawn to exclude all land within the adopted SOU8 – 'The Green' Site Allocation (EB2) that is either subject to industrial land protection or designated within the King Street Neighbourhood Centre.
- 1.21 This boundary refinement has resulted in an irregular, isolated site effectively constrained on all sides by industrial and/or commercial/town centre uses. Such constraints will practically inhibit development, as any proposal will be expected to accommodate Agent of Change principle and suitably mitigate its impacts on adjoining uses.
- 1.22 These factors raise substantive concerns regarding the deliverability of Site 10SO and whether it can be optimised in line with the expectation of London Plan Policy D1 and the Framework<sup>5</sup>, which both require the efficient land use. To this regard, we note EB73A identifies the Site as contributing 564 homes at an equivalent density of 275 homes per hectare.
- 1.23 For these reasons, we recommend a review of Development Site 10SO's boundaries with the inclusion of the TRS Estate land within the wider allocation. This adjustment would enable a comprehensive masterplan approach allowing the co-location and intensification of industrial and residential uses to maximise regeneration output in accordance with Local Plan policies.

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<sup>3</sup> CFS25 – TRS Estate

<sup>4</sup> S17 Atlas of Change – Ref. 40

<sup>5</sup> Framework (2023), Paragraph 135.