

## **Written Statement**

On behalf of Montreaux Developments Limited  
(Representation ID 691)

July 2025

## Introduction

- 1.1 Our client, Montreaux Developments Limited, is the majority landowner of Draft Site Allocation 08SO (hereafter: “the draft allocation”; “the site”), as fully set out in **Part B, Section 5** of our Reg. 19 written representations<sup>1</sup> (hereafter: “R19WR”) and summarised in Paragraphs 1.2-1.6 below.
- 1.2 Our client’s land ownership comprises 4.82 hectares for which Outline Planning Permission has been granted relating to its comprehensive redevelopment in November 2019 (LPA ref. 183673OUT; hereafter: “the extant Permission”; as amended in February 2024 under LPA ref. 224177NMA). The extant Permission secured the phased delivery of up to 2,083 homes (Use Class C3), a hotel (Use Class C1), flexible retail floorspace (Use Classes A1-A5) as well as flexible office/community space (Use Classes B1/D1/D2) across seven development plots.
- 1.3 Reserved matters for the first development phase (Plots A & B) were approved in November 2023 (LPA ref. 224785REM; “the RMA”). This submission related to the detailed design of 867 homes (including 35 per cent affordable housing), a 180-key hotel, flexible commercial/retail uses, and the surrounding public realm including Healum Avenue, the strategic east-west link through the site.
- 1.4 Our client is targeting the implementation of the RMA in Q3 2025 and is currently in the process of discharging relevant conditions.
- 1.5 For the avoidance of doubt, the site currently falls within Site Allocation SOU6 of the LB Ealing Development Sites DPD (2013).
- 1.6 Our client has duly made representations to the emerging Local Plan (“the Plan”), including suggested modifications and proposed changes set out in **Section 6** of its R19WR, raising the following matters:
  - Their *in-principle* support to the comprehensive redevelopment of the site under the draft allocation to deliver much-needed new homes alongside a range of non-residential uses, thereby enabling the long-awaited regeneration of this part of the Opportunity Area;
  - The failure of the draft allocation to reflect the established maximum development parameters under the (extant) Permission and subsequent RMA which represents a tested and approved development scenario; instead stipulating significantly reduced height and massing for the site;
  - The draft allocation therefore being unsound, as drafted, as it fails to (1) properly respond to national policy (predominantly **Chapter 11** of the NPPF) (and **Policies GG2 and/or D3** of the London Plan), and (2) demonstrate how it makes most effective use of a largely unrestricted, sustainable brownfield site. Evidence suggests that additional building height (scale) and housing

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<sup>1</sup> See S21 (Rep. ID 691).

capacity (density) are justifiable and indeed necessary to optimise the use of the site and to deliver it viably; and

- Should viability constraints prevent the Permission (and/or any other form of residential-led development) from being delivered, an alternative development scenario reflective of the site's current land uses (and former policy designation) seeking the provision of employment-land uses to be considered, thereby maintaining flexibility that the site can address some form of identified need.

- 1.7 This Written Statement seeks to demonstrate that the regeneration and anticipated growth proposed by our client is justified and appropriate, and assists the Council in meeting its identified needs enabling the Plan to maximise the range of benefits this site is capable to deliver.

## Matter 9: Development Sites

### Town Plan Development Site Allocations – Responses relate to 08SO only

***1. For effectiveness, is it sufficiently clear that the Plan seeks to formally allocate the Development Sites as land for development?***

***Response:***

- 1.8 In the case of 08SO and wider Southall Development Sites, it is considered that the combination of the Draft Policies Map and Figure 3/Para. 4.7.58 onwards are clear that the Plan formally allocates respective Development Sites as land for development.

***2. Are the overarching principles for the Development Sites (set out at the start of each section, e.g. Acton is at para 4.1.61) justified and deliverable, including the expectation that key infrastructure is expected to be delivered in early phases of development?***

***Response:***

- 1.9 The general intention of the overarching principles is deemed justified/deliverable. In relation to Para. 4.7.63, it is noted that whilst it is expected for individual Development Sites to accord with the development plan as a whole, legislation is clear that this should be the case unless material considerations suggest otherwise<sup>2</sup>.

***3. 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?***

***Response:***

- 1.10 Our client does not wish to comment on this question, but reserves the right to contribute to the discussion at the Hearings.

***4. For soundness, is it necessary for individual site allocations within the Plan to set out the anticipated yields for numbers of housing units and/or commercial floorspace to be delivered?***

***Response:***

- 1.11 Our client considers that planning applications are usually best placed to identify and thoroughly test appropriate densities/capacities, including housing units and non-residential/commercial floorspace, alongside maximum building heights.
- 1.12 Whilst we understand that the Council has undertaken limited indicative capacity testing<sup>3</sup> which is not entirely clear on how it relates to individual site allocations, identifying approximate capacities in the Plan may provide guidance to future developers and enable the Council to better demonstrate how it intends to meet its identified needs across individual site allocations.

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<sup>2</sup> See Section 38 of the Planning and Compulsory Purchase Act 2004 (as amended)

<sup>3</sup> I.e. in EB45B (Page 215)

- 1.13 However, as future planning applications will be subject to detailed testing, any site-specific capacities should be expressed as ‘*guidance*’/‘*indicative*’ rather than ‘*maxima*’ to enable flexibility for sites to optimise the use (brownfield) land, as required under **Chapter 11** of the NPPF.

***5. Is the methodology for determining building heights robust and are the building height limits for each site allocation consistent with it?***

***Response:***

- 1.14 As set out in the R19WR, our client still fundamentally disagrees with the Council’s overly conservative approach to identifying appropriate building heights (and therefore resulting scale and density) for this site (and potentially other sites) which is not considered to be in accordance with national policy as it fails to make most effective use of brownfield land (**NPPF Chapter 11**).
- 1.15 For the avoidance of doubt, the draft allocation (08SO) refers to appropriate height of up to 16 storeys (56 metres). The RMA, in full compliance with the Permission, demonstrated that buildings up to 27 storeys (c.124 metres) are acceptable and appropriate, showing the clear discrepancy between the Plan and relevant, tested evidence and why it cannot be deemed to be in accordance with the NPPF.
- 1.16 As further set out site-specifically in Paras. 1.34 onwards, the Council therefore failed to take into account fully tested (extant) planning permissions/reserved matters approvals which were subject to detailed townscape, heritage, and environmental assessments whilst demonstrating that living conditions for (existing and) future residents are acceptable, when determining ‘appropriate’ building heights, thereby failing to truly optimise (brownfield) sites. The existing and emerging development context in Southall has been subject to significant change in recent years. The acceptability of tall buildings has been established across the Opportunity Area (as is shown in the Vu.City ‘existing’ views in EB45<sup>4</sup>). However, it is this established baseline which seems to be disregarded by the Council’s evidence base when identifying appropriate heights for its site allocations which consequently do not achieve the density levels needed to make most effective use of this highly accessible, sustainable area.

***6. Is the methodology for assessing heritage impacts of site allocations robust and is each site allocation consistent with it?***

***Response:***

- 1.17 Our client does not wish to comment on this question, but reserves the right to contribute to the discussion at the Hearings.

***7. Given the identified deficiencies in access to open space in the evidence base, how do the policies in the Plan assist with addressing this issue and will they be effective?***

***Response:***

- 1.18 Our client does not wish to comment on this question, but reserves the right to contribute to the discussion at the Hearings.

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<sup>4</sup> i.e. see EB45B, Pages 190 or 206

**8. Given the number of allocations affected, how has flood risk been taken into account, both in terms of assessing the capacity of site and any measures necessary to manage the issue? Will the measures be effective and are they consistent applied across the relevant proposed allocations in the Plan?**

**Response:**

- 1.19 Our client does not wish to comment on this question, but reserves the right to contribute to the discussion at the Hearings.

**9. How have air quality issues been considered, evidenced and reflected in the choice of site allocations and any necessary mitigation?**

**Response:**

- 1.20 Our client does not wish to comment on this question, but reserves the right to contribute to the discussion at the Hearings.

#### **Site specific questions – 08SO**

**10. For each proposed development site, please set out:**

**a. the background and how it was identified;**

**Response:**

- 1.21 Whilst this is a question addressed to the Council, our client wishes to note that as per our R19WR, the draft allocation is supported by our client considers it to be available, suitable and deliverable within the Plan-period. Our client is in the process of implementing the RMA in Q3 2025.

**b. the uses to be permitted and how they are justified;**

**Response:**

- 1.22 The site has been identified for a residential-led mixed use redevelopment which is and remains supported. On Page 9 of our R19WR, our client set out its position on any non-residential uses which should be compatible with new housing, proportionate and supporting the existing offer in the surrounding Opportunity Area.
- 1.23 The Permission originally secured a large component of flexible office / community / social infrastructure floorspace (c.10,000 sqm). This flexibility was deemed necessary to enable reserved matters to respond to market need/demand at the time of delivery. Flexible spaces were (and are) further deemed beneficial to enable the site to respond to changing market conditions and adapt over time. The RMA has secured ancillary commercial uses along the main east-west route and a 180-key hotel, and other non-residential uses were envisaged to come forward in later development phases.
- 1.24 It is important for any such uses to be based on up-to-date evidence. As such, our client suggested in Section 6 of its R19WR that this should be a mix of hotel (as approved by the RMA), flexible commercial, retail and community/social infrastructure uses. It is not considered that there is robust evidence to stipulate that the site needs to provide a 'health facility' or 'community centre' (see Design Principles). Neither EB83 (although it

recognises the shortfall in primary healthcare in Southall<sup>5</sup>) nor EB84 (which directs such a facility to the nearby Green Quarter & Park Avenue development sites<sup>6</sup>) direct such uses to the site. Therefore, specific reference to such uses should be removed with any social infrastructure being provided where this responds to a directly identified need at the time of any new planning application coming forward.

- 1.25 Whilst the Permission secured a significant amount of office floorspace, such use should only be re-provided where up-to-date evidence confirms that there is local demand.
- 1.26 In Section 5, Part 2 (Alternative Development Scenario) of its R19WR, our client further set out that an alternative employment-led redevelopment of the site may be capable of addressing wider identified needs by the Council in case the delivery of a residential-led development/the RMA becomes unviable, with this alternative development scenario still being able to come forward in accordance with and meeting the strategic objectives of Draft Policies E4(Hc) and/or (I)<sup>7</sup>, i.e. as a potential Co-Location scheme, and SP4. Whilst the Council disregarded the points made in our R19WR around this required flexibility due to the complex delivery framework that the entire industry is currently dealing with and which is evident across the Borough (and Greater London), it is considered that preparing the site for a ‘fall-back option’ is necessary and ensures a positively-prepared and justified Plan<sup>8</sup>.

***c. how the boundaries and extent of the site have been defined and justified;***

***Response:***

- 1.27 See Response to Q99 below.

***d. for housing allocations, the anticipated capacity of the site and whether this is justified;***

***Response:***

- 1.28 The site’s capacity should be based on the number of homes tested and found acceptable under the Permission (i.e. an indicative capacity of 2,083 new homes). As set out in this Statement, the Permission is a recent, fully tested development scenario for the site which should form the basis of the Council’s approach to optimising this brownfield site in accordance with the NPPF (and London Plan), similar in terms of its density (i.e. units per hectare) than many surrounding schemes in Southall.

***e. for commercial development, the estimated floorspace and whether this is justified;***

***Response:***

- 1.29 Notwithstanding the amount of flexible non-residential floorspace secured under the Permission, any new planning application should ensure that any non-residential uses remain flexible and are proportionate to the residential component and existing non-

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<sup>5</sup> See Section 2.1.5

<sup>6</sup> See Section 3.5

<sup>7</sup> Also See Para. 5.29 (and SMM139), highlighting the importance of intensifying the Council’s existing industrial capacity to meet its increasing industrial need, as well as EB49 and EB54.

<sup>8</sup> Thereby reflecting the requirements of NPPF (2023) Paragraph 127a)

residential offer in the surrounding area rather than specifying an indicative, potentially unachievable or unviable target capacity.

***f. evidence of the expected timescale and rate of development, and how assumptions are justified and deliverable;***

***Response:***

1.30 See Paragraph 1.21.

***g. whether any relevant technical constraints have been identified and how appropriate mitigation will be secured;***

***Response:***

1.31 Our client does not wish to comment on this question, but reserves the right to contribute to the discussion at the Hearings.

***h. how the relevant design criteria are justified, and whether they appropriately address any technical constraints in line with the development plan as a whole;***

***Response:***

1.32 Please refer to Section 6 of our R19WR for a detailed overview of suggested modifications to ensure the Design Principles are fully justified resulting in a sound site allocation.

***i. the specific infrastructure dependencies necessary in order for the site to be deliverable, whether the infrastructure needs to be in place upfront and the assumed timescales for delivery;***

***Response:***

1.33 Please refer to Section 6 of our R19WR and Para. 1.22 onwards for a detailed overview of suggested modifications to ensure the Design Principles are fully justified resulting in a sound site allocation.

***j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;***

***Response:***

1.34 As part of our R19WR (**Section 5**), our client highlighted that an increased maximum building height, in accordance with the Permission/RMA, and therefore site capacity is both justifiable and – on balance – necessary to maximise the public benefits this site can deliver, thereby ensuring consistency with **Chapter 11** of the NPPF in terms of making most effective use of brownfield land and contributing towards meeting the Council's identified needs. The 'appropriate' heights (see S24; SMM115) identified by the Council for the draft allocation are neither justified (and have not involved testing of an acceptable baseline height/density established by the Permission/RMA) nor in accordance with national policy and fail to make most effective use of brownfield land.



- 1.35 As referenced in our R19WR and by newly published evidence since then, the Council has failed to meet its objectively assessed housing need in recent years<sup>9</sup>, recent data identified that there have been no (private) housing starts in LB Ealing (in schemes of 20 units or more) in Q1 2025<sup>10</sup>, and has been unable to demonstrate a five-year supply of deliverable housing sites (as of summer 2024)<sup>11</sup>. In addition, the Council reported that it can only achieve 3.9 years supply of housing at the Stage 1 Hearings.
- 1.36 It is therefore clear that the Council should make most effective use of its available brownfield sites in order to increase the supply of homes, especially where a timely review of the Plan is necessary post-adoption, which will then need to take into account the revised housing targets for London under the new NPPF's (2024) methodology<sup>12</sup>.
- 1.37 The 'appropriate' building heights in the draft allocation remain significantly below those tested and deemed acceptable by both the Council and the Mayor of London as part of the Permission and confirmed in its subsequent detailed design stage in the RMA for Plots A & B.
- 1.38 The Permission and RMA demonstrated that heights ranging from 1 to 27 storeys are acceptable in this location from a townscape, heritage, and environmental perspective, as well as cumulatively within the surrounding development context. The RMA represents an extant consent which our client is seeking to implement at the earliest opportunity<sup>13</sup>. It maximised the full potential of the site, achieved good growth and made most effective use of the site, whilst – as confirmed by the Council in its assessment – achieving acceptable living conditions for future residents, thereby demonstrating that a taller (and therefore denser) scheme is acceptable on this site in accordance with the requirements of **Paragraphs 124 and 125** of the NPPF (2024)<sup>14</sup> as well as relevant London Plan policies<sup>15</sup>.
- 1.39 Whilst the Council, without providing any reasonable justification to defend its approach to setting maximum building heights in this location, replied to our R19WR in S21, noting that “[p]olicies should not necessarily be expected to align with historic planning permissions”, it is clear that our written representations to the draft allocation are not based on a 'historic' planning permission, but an extant, deliverable and recently/fully tested scheme which, unlike the draft allocation, was prepared in accordance with the above paragraphs of the NPPF.
- 1.40 **Section 5** (of our R19WR, see **Pages 4-9**) included a detailed overview of why the Permission and its associated maximum building heights, scale and capacity were deemed acceptable in this development/surrounding context which is not repeated here. However, it is worth reiterating that the Council also concluded, when determining

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<sup>9</sup> 2023 Housing Delivery Test (84%)

<sup>10</sup> Molior London Development Report (April 2025)

<sup>11</sup> For instance, see Appeal ref. 3338084

<sup>12</sup> 87,992 homes p.a. (see, for instance, Para. 1.3 of the Towards a New London Plan: Consultation on the next London Plan, May 2025)

<sup>13</sup> In November 2024, the Council granted a Certificate of Proposed Lawful Development to confirm that our client's intended route of implementation is acceptable (LPA ref.243387CPL). Separately, our client has started the discharge of relevant planning conditions attached to the Permission/RMA.

<sup>14</sup> NPPF (2023) Paragraphs 121 and 122

<sup>15</sup> For instance, London Plan Policies GG2, D3, H1 and others

the RMA, that the development, including its maximum building heights, were in accordance with key policies of the London Plan (i.e. Policies D4, D5 and, most importantly, D9), clearly demonstrating that a development of this scale and massing is acceptable and justified.

- 1.41 Accordingly, those approved and tested heights should have formed the basis for the Council's approach towards testing/identifying appropriate building heights as part of its Local Plan evidence base if it wants to ensure that the Plan makes most effective use of brownfield land in accordance with national policy (and the London Plan) and is therefore sound.
- 1.42 For completeness, an overview of the maximum building heights (up to c.124 metres/27 storeys) secured under the Permission (**Figure 1**) and the subsequent RMA (**Figure 2**, Plots A & B) in comparison to those tested by the Council in its evidence base (EB45B) (**Figure 3**) is provided below, clearly demonstrating that the draft allocation (up to 16 storeys) far from optimising densities on this brownfield site – and therefore maximising its public benefits/contribution towards identified needs. The building heights in the centre and southern parts of the site are similarly far lower than those previously tested/approved.

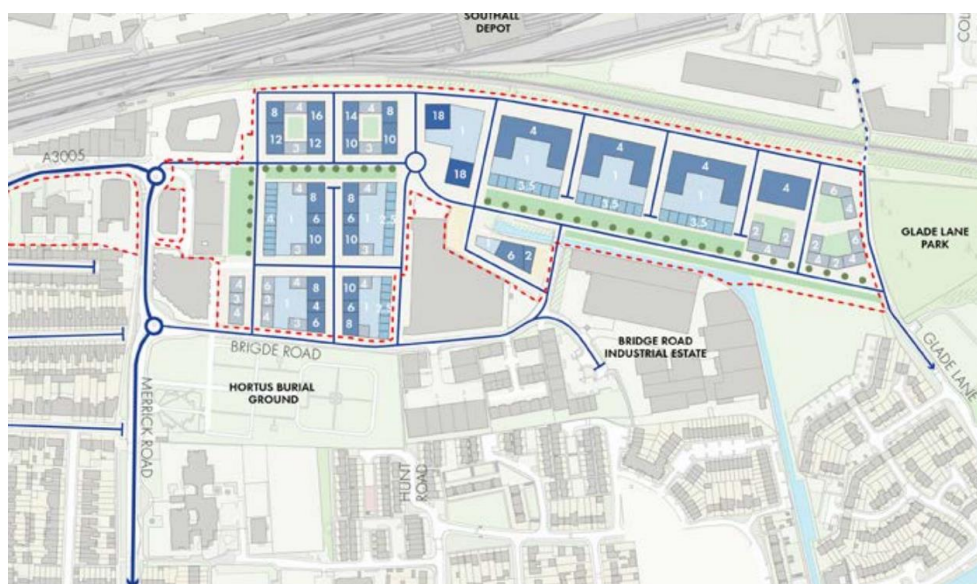
**Figure 1: Aerial view sketch of the Permission (2019)**



**Figure 2: Approved massing of the RMA**



**Figure 3: Tall Buildings Study (December 2023), Appendix 2, Page 212**



- 1.43 It is therefore not considered that the Council's Tall Building Strategy (EB45B) adequately tested the site's suitability for taller buildings (i.e. on the basis of the Permission/RMA – which were only granted four and one year(s), respectively, prior to the publication of the Strategy – and established a fully tested development baseline) than those specified in the draft allocation nor that its underlying evidence base is clear on how it arrived at maximum building heights and/or resulting site-specific housing capacities<sup>16</sup>.
- 1.44 The heights achieved under the Permission/RMA are therefore justifiable in relation to its site-specific constraints and infrastructure provision and, as a consequence, necessary to make optimum use of this brownfield site in accordance with national

<sup>16</sup> See Paragraphs 35-67 of our R19WR.

policy (whilst ensuring adequate living conditions are maintained). There is no evidence or change in national/regional policy which would suggest that the assessments and conclusions of the supporting documents submitted with the Permission/RMA or, indeed the Council’s own decision-making, are no longer applicable necessitating a less optimised approach to densities/capacities on this site. As such, the evidence provided by our client demonstrated:

- Proposed heights ranging from 1-27 storeys are considered justifiable in terms of their impacts on townscape/heritage, daylight/sunlight, wind microclimate and other environmental matters whilst also achieving adequate living conditions;
- The site is suitable for high densities given its proximity to public transport, social and employment infrastructure, and when seen in conjunction with its existing/emerging surrounding development context;
- The capacities are acceptable from a transport impact perspective;
- Where necessary, direct infrastructure delivery or justified financial contributions were (or can be) secured to ensure that the impacts of the envisaged housing capacity can be adequately mitigated (i.e. on transport or social infrastructure).

- 1.45 Based on the lack of testing undertaken by the Council to truly make ‘as much use as possible of previously-developed’ land (NPPF Para. 124<sup>17</sup>), i.e. assessing alternative options taller than those in EB45, it is considered that the ‘appropriate’ building heights in the Plan/draft allocation are unsound and fail to align with national policy.
- 1.46 As abovementioned, given the Council’s significant housing need, it is important to review, optimise and intensify brownfield sites where this is justifiable in townscape/heritage, environmental, social and transport infrastructure terms, yet it is unclear why relatively unrestricted sites such as this – with good public transport accessibility, in an Opportunity Area and in proximity to local amenities – have not been robustly tested as part of the Plan-making process (and publicly available evidence) with a view of optimising their scale, density and development capacity.
- 1.47 Whilst not directly applicable to the site, it is worth noting that the Planning Inspectorate in its recent appeal decision for the John Lewis site at 2 Alexandra Road, London, W13 ONL, (Appeal ref. 3347877) considered that the Council’s approach to determining appropriate heights in its context cannot “realistically be said to optimise site capacity”. This is even more the case for the draft allocation which is subject to a significantly taller surrounding development context.

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<sup>17</sup> Para. 121 of the NPPF (2023); also see London Plan (2021) Policies GG2, D3 and H1

***k. whether the allocation will result in the loss of any industrial floorspace and, if so, the specific designation (SIL/LSIS/non-designated) and how any loss is justified;***

***Response:***

1.48 N/A.

***l. whether the site has been taken forward for targeted assessment in the Level 2 - Strategic Flood Risk Assessment [EB99] and, how that assessment affects the assumed capacity or delivery rate of the site and how any identified mitigation will be effective;***

***Response:***

1.49 Our client does not wish to comment on this question, but reserves the right to contribute to the discussion at the Hearings.

***m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;***

***Response:***

1.50 Our client does not wish to comment on this question, but reserves the right to contribute to the discussion at the Hearings.

***n. how measures designed to promote sustainable travel will be effective;***

***Response:***

1.51 Our client does not wish to comment on this question, but reserves the right to contribute to the discussion at the Hearings.

***o. clear evidence of whether the site is viable and developable at the scale of development expected;***

***Response:***

1.52 Page 5 of our R19WR set out that development viability is an important factor for and main reason behind the stagnating delivery of various housing sites across the capital. Whilst the Council in its response to our R19WR did not consider our high-level summary on this matter as detailed enough to give it any further attention, it is fully recognised as a factor limiting delivery by the Mayor of London as set out in Para. 1.4 of its recent London Plan Consultation document<sup>18</sup>.

1.53 Optimising brownfield land including the draft allocation is essential in order to ensure that the site is viable and deliverable, as set out in our R19WR. Our client is dedicated to progress with the implementation of the RMA and do everything in its power to facilitate the delivery of the regeneration site, however this is only possible if the Plan creates a framework within which the site is viably deliverable and makes optimum use of brownfield land. To a large extent, development viability is a key reason for why the site has not been built out to date (even at the densities originally secured).

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<sup>18</sup> Towards a New London Plan: Consultation on the next London Plan, May 2025

- 1.54 It is therefore considered that a development resulting in a significantly lower quantum/capacity, due to the site not being optimised, is likely to be unviable and undeliverable. The reasons for that are, for instance, that:
- (i) Development viability has become extremely challenging over the last 24 months for a variety of reasons, including challenges created by new building safety and fire regulations or a sustained inflation in build costs.
  - (ii) Significant abnormals/enabling development costs.
- 1.55 The combination of these two factors means that a critical mass of development is required to provide sufficient return which covers the costs of the abnormal/enabling costs; and delivers a minimum risk adjusted return for developers and funders/investors.
- 1.56 Where the quantum of development is reduced below a certain critical mass, the resulting level of return is insufficient due to the reduction in revenue generating floorspace and, consequently, total scheme revenues; and the fact many of the abnormal/enabling costs are fixed costs which will not reduce proportionally in line with a reduction in height, density and floor area.
- 1.57 The result of this is that the overall construction cost (£/psf) increases where the density is reduced (i.e. there is less floor area for these relatively fixed costs to be split between increasing the rate).
- 1.58 The flexibility of mixed-use development allowing an optimised blend of residential and non-residential uses is key to unlocking a viable, deliverable scheme.
- 1.59 In conclusion, our client does not consider that the site can or will be viably developed at the Council's envisaged reduced height/massing which would result in the site stalling for the foreseeable future.

***p. any modifications that are necessary for reasons of soundness.***

***Response:***

- 1.60 Our client strongly considers that the proposed modifications set out in **Section 6** of our R19WR remain necessary to ensure a sound and deliverable site allocation. It is not considered that the Council's proposed minor modifications (S24) are sufficient to ensure the draft allocation, and therefore the Plan, are justified and consistent with national policy (and the London Plan) in terms of optimising available brownfield land.

***99. Is the boundary of the site justified, including in terms of helping to achieve sustainable development and the availability of relevant land?***

***Response:***

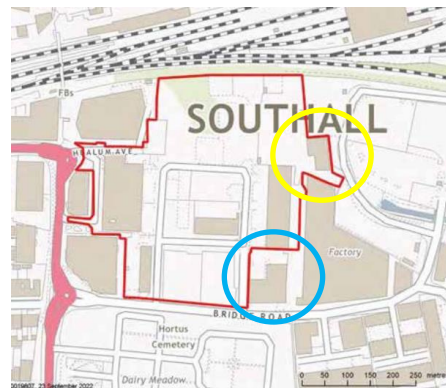
- 1.61 The Council increased the site allocation boundary at its south-eastern corner between Reg. 18 and Reg. 19 to include the land/building east/south of our client's landholding, north of Bridge Road and west of Charles House, known as Unit K. See **Figure 4** below (highlighted in blue) for a comparison between the Reg. 18 and Reg. 19 site allocation boundary (with the Reg. 18 boundary reflecting our client's landownership).

- 1.62 In our R19WR, we flagged in **Section 5 (Introduction)** and **Section 6** that the additional land sits outside our client’s land ownership which makes a comprehensive delivery of the Draft Site Allocation more complicated.
- 1.63 Full details are not repeated here, but – for the avoidance of doubt – our client can only control delivery within its own landownership and any future masterplan for this part of the site can simply safeguard that some form of future development on the Unit K site is not undermined. Our client cannot comment on the availability of this site.
- 1.64 It is acknowledged that the Council noted in S21 (Page 701) that ‘development sites are not allocated on the basis of land ownership boundaries’. However, sites should be allocated where the Council can demonstrate that they are available, suitable, and deliverable/developable in accordance with Chapter 5 of the NPPF. It is not clear whether this is the case for the additional land identified.
- 1.65 Similarly, it is noted that land at the north-eastern boundary (highlighted in yellow) has been removed from the draft site allocation without any reasonable explanation. The land sits within our client’s landownership and forms part of the Permission and the RMA, and is therefore clearly available and deliverable and should be included in the draft site allocation rather than being incorporated into a newly created Locally Significant Industrial Land designation. The extant RMA approved a new roundabout and public realm in this location, clearly demonstrating that the Council has not had regard to any extant decisions when considering policy/land use designations for this part of Southall.

**Figure 4: Site Allocation boundary / landownership**



**Reg. 19 Site Boundary (08SO)**

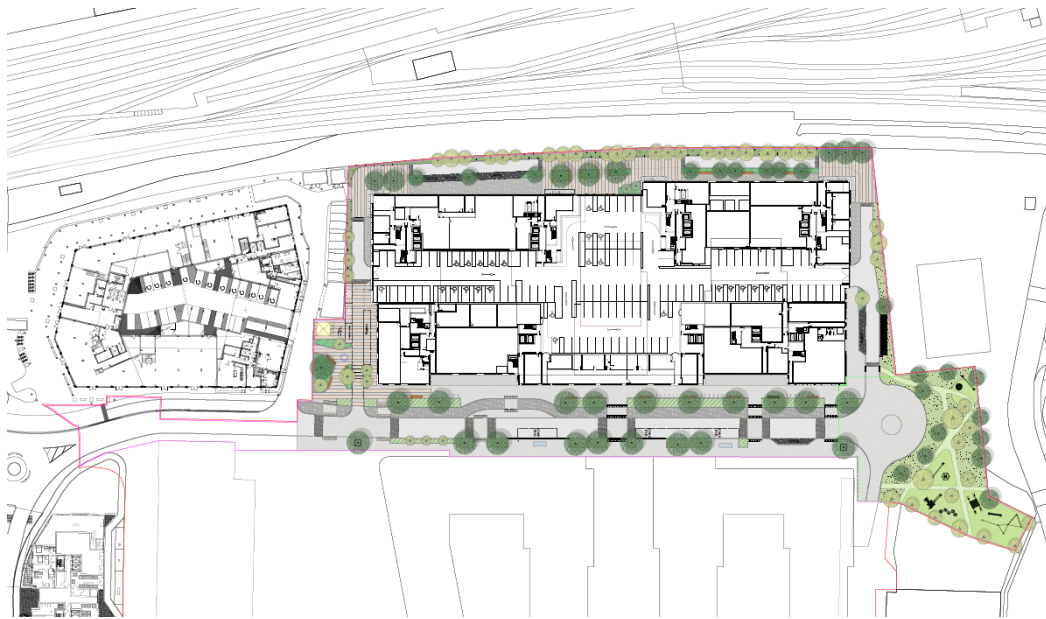


**Reg. 18 Site Boundary (SO11)**

- 1.66 An overview of the extent of the RMA is provided in **Figure 5** below.



**Figure 5: Approved Ground Floor Landscape Masterplan under the RMA**





**Turley Office**  
London

020 7851 4010