



Quod

Matter 9

Development Sites -
11SO

Ealing Local Plan

Statement prepared by
Quod on behalf of
Berkeley Homes

10TH JULY 2025

Matter 9: Development Sites - 11SO

- 1.1 On behalf of Berkeley Homes, Quod submits a 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 8th 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 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.

Q2 – Are the overarching principles for the development sites justified and deliverable, including the expectation that key infrastructure is expected to be delivered in early phases of development?

- 1.6 In respect of the overarching Development Site principles for Southall (Paragraph 4.7.64), we raise the following:

Tall Buildings

- 1.7 As we have set out in Matter 6, the Mayor of London has objected to the Ealing Local Plan tall building policy as being too complex, and inflexible¹. Whilst it refers to appropriate building heights it should also allow the necessary flexibility to optimise development sites, whilst responding to changes in policy and statutory guidance. This approach has clearly been advocated by the Planning Inspectorate in the recent West Ealing, Waitrose appeal decision².
- 1.8 For 11SO, it states that *“Design analysis indicates an appropriate height of up to 18 storeys (63 metres)”*³.

¹ Greater London Authority: Regulation 19 Representation to Ealing Local Plan (10th April 2024)

² APP/A5270/W/24/3347877

³ S24 - Schedule of Suggested Modifications, November 2024 – SMM118

1.9 We disagree with this statement. The height thresholds have largely been informed by CAA aviation maximum height limitations, not by the Council's design analysis.

1.10 Only a limited design assessment appears to have been undertaken for 11SO with EB44 stating as follows:-

“Zone L is a large triangular parcel of previously industrial land which is currently being redeveloped as a mid to high rise residential development. Zones J and L are subject to numerous consented planning applications and both have significant character changing potential”.

1.11 This is not sufficient to determine that the largest strategic site in the borough should have an “appropriate height up to 18 storeys (63 metres)”.

1.12 EB45B identifies 11SO⁴ as an appropriate tall building allocation of low sensitivity and high suitability. The recommended appropriate heights have been informed by the extant planning consent⁵ which is artificially restricted by the CAA limitations, rather than by actual site analysis and urban design considerations. The detailed assessment undertaken for the recent planning applications indicates that the site could accommodate greater site optimisation due to the limited constraints and suitability, in agreement with EB45B.

1.13 The Council has made reference to the Heathrow CAA height limitation at S24⁶, but this is in the context of a statutory restriction rather than an opportunity to review building heights should the CAA thresholds change. This needs to be reflected through 11SO.

Housing

1.14 Development Sites will be expected to demonstrate how they satisfy the requirements of the Council's Housing Strategy (EB82). From review of the several documents contained under EB82, it is unclear which of the documents listed under the Housing Strategy would need to be considered. Please can the Council confirm its intention.

1.15 From review of the Private Sector Housing Strategy and Executive Summary, we note that the document is dated, referring to legislation that is no longer relevant or has since been superseded. From review of its content, the Strategy contains very little information that would be of relevance to a planning application made for the redevelopment of an allocated Development Site.

1.16 The expectations that development proposals must satisfy the Council's Housing Strategy at the point of application is therefore not justified or effective, and should be removed.

Key Infrastructure Requirements

⁴ Study Site SO14

⁵ 171562VAR

⁶ SMM118

- 1.17 Our Matter 8 Hearing Statement raises concerns that the Local Plan's approach to infrastructure planning is unsound as it fails to fully account for the potential cost of identified infrastructure projects.
- 1.18 Where infrastructure shall be funded by financial contributions drawn down from Section 106 Agreements or pooled CIL monies or where it requires the agreement of other parties, flexibility must be applied to enable infrastructure to come forward in later phases to avoid development from stalling.

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?

- 1.19 It is imperative that flexibility is applied across the Development Site, and across the Local Plan generally, to ensure that it can respond to the changing needs of the Borough and London. This is particularly important in view of the '*Towards new London Plan*' which is expected to increase housing targets alongside other changes to strategic policies.
- 1.20 The majority of Development Sites identified through the Local Plan do not benefit from an extant planning permission, and therefore the design principles that inform each Development Site have largely been formulated based on the Council's own interpretation as to how a development may come forward in accordance with the other Local Plan or London Plan policies.
- 1.21 Evidently, this is one of potentially many ways that a development could be brought forward. Accordingly, the Local Plan should make clear that the Development Site design principles are to be treated as guidance only with flexibility applied throughout.

Q4 – For soundness, is it necessary for individual site allocations within the plan to set out the anticipated yields for number of housing units and/or commercial floorspace to be delivered?

- 1.22 Yes.
- 1.23 The absence of defined development capacities undermines the ability to assess whether the Plan's overall housing and employment targets are sufficient to meet the Borough's needs, and can realistically be met within the plan-period. Clear, site-specific yield expectations provide transparency to decision-makers, landowners, and the public, and form the basis for infrastructure planning, viability testing, and Local Plan monitoring.
- 1.24 From our review of EB73A, it is evident that the Council has undertaken this exercise for several site allocations without extant permissions which the '*Conventional Allocations (Large)*' tab provides estimated net housing capacities.
- 1.25 Collectively, these sites are expected to contribute approximately 10,323 homes to the Borough's overall housing trajectory. Given their strategic role in delivering the Borough's growth. Development Site capacities should be reported as minimum yields.

Q5 – Is the methodology for determining building heights robust and are the building height limits for each site allocation consistent with it?

1.26 No.

1.27 As set out in our Matter 6 Hearing Statement, we have significant concerns that the methodology used to determine building heights throughout the Local Plan is neither robust nor consistent with the London Plan. We also raised concerns that the evidence base has not completed a robust analysis of 11SO's potential for tall buildings, and has simply deferred to the heights approved via the recent planning permissions which are constrained by the CAA..

1.28 The proposed Modification (S24) amends the text to refer to “*appropriate height up to 18 storeys (63 metres)*”⁷ across Development Site 11SO (The Green Quarter), however it fails to acknowledge that these heights are largely informed by the Heathrow CAA limitations, not design limitations.

1.29 Setting an appropriate height of 18 storeys with limited analysis is not therefore a positive approach, and flexibility should be applied for Development Site 11SO (and other Southall sites) to allow building heights to be revised in the instance that the CAA maximum height restrictions change in the future.

Q103 - Will the allocation support sustainable development of the Green Quarter and its surroundings?

1.30 Development will not be sustainable if needs are not met, and further controls on development are placed on housing delivery.

1.31 The Local Plan fails to meet the development needs of the area (absence of 5YHLS⁸); does not align with the London Plan Opportunity Area growth expectations (due to the Council's refocus of employment-led growth to the Southall Opportunity Area⁹) and has an incomplete approach to costing infrastructure requirements (demonstrated by unqualified infrastructure costs and uncertainty over deliverability¹⁰).

Q104 - Will the approach of supporting development of the site through an agreed masterplan be effective, including this specification within the policy of what a master plan should contain and linkages with the wider development of the area?

1.32 The principle of progressing a masterplan for 11SO is consistent with the London Plan Policy D4. All future Reserved Matters shall be brought forward in accordance with the controlled documents which inform the wider masterplan.

⁷ S24 - SMM118

⁸ EB73

⁹ Local Plan Figure SS1

¹⁰ EB84

- 1.33 Notwithstanding, it is important that flexibility is applied across 11SO in accordance with the Design PPG¹¹. This is particularly important given that the delivery of The Green Quarter development will extend beyond the 15 year Local Plan period.
- 1.34 Flexibility across the masterplan will therefore allow for adjustments based on the evolving needs of the Borough (and London), technological advancements, and any unforeseen challenges ensuring that the Masterplan remains relevant and effective over time, and ultimately reducing the need for the masterplan to formally revised.

Q105 - Is the allocation justified and general conformity with the London Plan in respect of car parking requirements?

- 1.35 The resolution to grant planning permission in November 2024 requires a maximum ratio of 0.3 car parking spaces per home, of which 20% will benefit from active charging with the remaining 80% having passive provision.
- 1.36 The residential car parking is therefore in accordance with the adopted London Plan (2021) Policy T6.1 for Outer London Opportunity Areas which allows up to 0.5 spaces per home¹².
- 1.37 The level of car parking is controlled via the Development Specification that forms an approved document and will therefore inform all future reserved matters applications.

¹¹ Paragraph: 007 Reference ID: 26-007-20191001

¹² London Plan – Table 10.3