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Sect. of State for Levelling up, Housing and Communities (DLUHC) - Planning Inspectorate Office
Ealing Council Planning Dept. Senior Planning Officer responsible for the Local Plan
Engagement Officers supporting the Local Plan procedures under Reg. 18 Consultation 2023

And TO WHOM IT MAY CONCERN

Started writing 3rd February 2023

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THIS IS A DRAFT DOCUMENT AND NOT YET FINALISED IN ORDER TO MEET EALING COUNCIL'S DEADLINE TO SUBMIT REPRESENTATIONS.

THIS DRAFT IS SUBJECT TO CHECKING: CORRECTION OF OMISSIONS , ERRORS , AMENDMENTS, DELETIONS ADDITIONS , EXPANSION ETC.

FOR NOW PLEASE ACCEPT THIS HOLDING RESPONSE UNDER REG.14

Dear Sir / Madam,

At the start I wish to raise the issue as to whether this purported Regulation 18 is lawful and being conducted properly. I believe an extensive survey / consultation should have been carried out prior to exercising the Reg.18 formal consultation. The Council's ideas and plans for the borough should have been advocated and presented widely across the borough last year so that residents and businesses could engage meaningfully during the statutory period. The stress now imposed on us is unacceptable . Something is remiss here and the Planning Inspector is requested to consider carefully whether the rules and regulations have been followed to the letter of the law.

WITHOUT PREJUDICE AND WITHOUT ACCEPTING THIS PURPORTED REG. 18 TO BE LAWFUL I MAKE INITIAL OBSERVATIONS ON THE SUMMARY OF THE DRAFT NEW LOCAL PLAN AND CHASING URGENT REQUEST FOR TIME EXTENSION

Ealing Council's refusal to extend time for the Regulation 18 consultation

I refer to my letter dated 12th January 2023 requesting a time extension in regards to the Regulation 18 Local Plan consultation. Southall people have hardly engaged in the Local Plan . This is due to Ealing's failure to take reasonable measures to give notice for Local Plan consultation. As far as I'm aware no time extension has been allowed to March 2023, although the engagement officers advised us at the Southall Walkabout and Workshop (12/01/23) that they would take our request back to the Leader of the Council. It is believed the power to grant an extension lies with the Leader of Ealing Council and certain cabinet members and

they have refused our request for more time, despite attending Southall Town Hall meetings acknowledging that Southall suffers high poverty indicators and digital exclusion. It's no different from telling a man to tie his shoe laces and set to work, knowing full well that he has no shoe laces to tie or even if he has, he simply doesn't know how to tie them, or worst still, he doesn't have any shoes! It has to be said that our immigrant communities in this area are the main reason for Ealing targeting Southall for further developments on landfill sites and brown fields, which in themselves are not sustainable and add hugely to the carbon and toxic air pollution. By refusing to accommodate a time extension to read the LP and related documents, Ealing is demonstrating its disdain for Southall's younger people who dare to question what's going on. Ealing does not want to be challenged by Southall people and question the policies they are imposing on us without any consultation. By refusing the time extension Ealing is saying this is Ealing's own plan for what it wants to do with Southall and they will Not accommodate us because Ealing is Not open to challenge.

EALING MUST LISTEN TO FEEDBACK FROM THE SOUTHALL COMMUNITY RE. DRAFT LOCAL PLAN.AND GIVE THEM TIME TO TAKE PART MEANINGFULLY IN THE REG.18 CONSULTATION.

1. Many aspects of the draft LP is Not in the best interests of the people of Southall or Acton or Greenford or other parts of Ealing. There are only a handful of people in our Southall community (like me /us) who are able to read and digest some of the vast amount of documentation and reports (relied upon by Ealing) and make efforts to understand what the LP really and truly means for Southall and also make judgments, taking account of our local and diverse immigrant communities wants and needs. People like me /us (raised in Southall) realise we are privileged and that it is our responsibility to safeguard our immigrant communities' interests, whether they are the elderly in their freehold houses or young families in rented accommodation who are very busy earning a living to meet rising costs, bringing up their families and taking care of the sick , elderly and less able and even their neighbours. Southall has great community cohesion and that is at risk , if the draft LP goes through without challenge.
2. We have natural empathy for our different communities because we have grown up against a background of poverty and without fair representation at local government level for more than 60 years, particularly since about 2012 (last 10 years). A few of us are willing to engage in this time consuming consultation, but we need proper time, taking account of this complex wide reaching changes proposed by Ealing's draft LP. There are so many documents that need to be read to understand the draft LP , e.g "Tall Buildings Strategy" , "Ealing Green Belt and Metropolitan Open Land Review Stage 1 Report"(November 2022) , NPPF, and many other development strategy documents, before any meaningful considered arguments can be written. We want to state matters in a way that can communicate a valid well founded argument , otherwise what's the point of engaging at all if we can't make a difference to the outcome using proper references and correct data?
3. People in Southall are very unhappy with what is being done to their environment without proper consultation and the direction that the Ealing Council is pushing them in. Ealing is pushing Southall out towards the edge of the borough where the high density towers and dense population can keep out of Ealing's way. Towers are being built to cordon off the poor relatives in the borough. Ealing has set out it's own Agenda in the draft LP and is now asking ask what we all think. They claim that the Shaping Ealing survey last year was all about gathering views from people in the borough which would the feed in to planning the changes over the next 15 years . Really? How come we knew nothing about it ? Ealing say about 10,000 /11,000 people across the borough responded and it was a

great result informing this LP. Really? Ealing borough has a population of 367,100 (2021 census ONS).

Nearly 82% of our population is over the age of 18 (2021 ONS), which is about 301,000. Therefore only about 3% (11,000) responded and how many of that number were from Southall 400 ? 500? 1000? And what does that response figure really mean where Southall's population in reality is closer to 80,000 and not the figure of 70,000 (2011) used by the Council in the LP. How can Ealing Council defend the integrity of Shaping Ealing Survey (Shaping Southall) when it's using old data from the very start. The old Authorities Monitoring Report 2014 uses 70,000 population for Southall. The response figures of 11,000 are abysmal? It's clear Ealing's set the Agenda for planning in the draft LP and this consultation is now being carried out to retrospectively inform the draft LP. Is that right ? Is it allowed? This is why the Regulation 18 consultation is now of the utmost importance and we really needed the time extension to properly interrogate the basis on which policies for Southall and other parts of our borough have been drafted.

4. This is no ordinary matter or consultation for Labour politics at Ealing Council. The developments and plans made by Ealing Council for Southall are flawed, because Ealing continues to ignore Southall peoples' basic environment needs: space, public open space, green space, clean air, truly affordable social rent housing for families (3/4 bed room homes), supporting social infrastructure etc. Ealing usually give 6 weeks consultation period for ordinary planning applications. If they are inviting applicants to join a panel on one of their projects they give about 8 weeks for submission of applications. This is a mammoth task to engage the whole borough in widespread plans and matters that are going to affect every part of our lives. Ealing's conduct has to be examined carefully so that as a matter of transparency we the people can be confident this purported Reg.18 consultation is lawful and properly conducted.
5. The issues we continue to suffer are: dense urban development /overdevelopment, high density tall buildings / towers developments, removal of air space, high density population, overcrowding, construction related air pollution, landfills and brown field releasing further toxins, lack of infrastructure and social infrastructure, removal of green spaces etc.
6. I will begin with a general response to the Summary of The Draft Local Plan Booklet , which I have read through briefly. I confirm I have no pecuniary or financial interests when making these representations on behalf of Southall people. I am a life long resident of Southall and for 24 years I had my practice in Southall Green. Until now I have never known that residents and businesses are consulted in relation to any Local Plan drafted by a local authority. And this is the first time I have known Ealing Council to carry out a Reg.18 consultation.
7. These representations are an outline of comments and observations that will be followed through and where necessary expanded upon or amended in due course and can be treated more as an outline at this stage. In due course I will give reference details to support the assertions made where appropriate. There are time constraints and I am mostly recalling information from documents I read last year in connection with The Green 2021 CPO Public Inquiry. I give notice and reserve my right to refer to various Reports, council documents data and its' sources (not yet seen or read) at any future hearing or meeting relating to this LP.

8. Meeting the Council's deadline of 8 February 2023 is of the utmost importance as under Regulation 18 we want these representations be taken in to account as the draft Local Plan progresses through it's various stages. On behalf of many Southall people I will try to give as much feedback in the limited time I have re. the draft Local Plan. However, I will continue to research the issues and build on the various points (beyond 7 February) where need be or even submit amendments where I have misunderstood things or erred. Please respect the fact that many of us are struggling to understand the full implications of the draft LP.
9. Any one person's efforts up against a council planning team has to involve a tremendous amount of work and effort. Be it known, that although there may be the odd community organization in Southall, they have strong links with the council due to funding links, but they do not represent the residents /businesses or residents' / business groups (if any). Further, it's highly unlikely that any such Southall based organisation has appraised the draft LP and submitted any feedback (as at 06/02/23) either on its own account, or for its affiliated community groups or voluntary organisations, despite Ealing giving presentations at Southall Town Hall in summer 2022. This cursory glance type of engagement or quick presentations suits Ealing Council. On paper it seems there has been 'engagement' , but in truth there has been no meaningful engagement.
10. Be it known, that those of us who are trying to engage are doing so because at this moment we have the time and can use our ability / skills to represent our different communities because we know that the people of Southall are being taken advantage of and are very unhappy. The majority of Southall people are disadvantaged because of the high poverty indicators. There is a serious lack of engagement in local government procedures because so many people are completely distracted with just making ends meet. "Equality" or "Inequality", a key theme of Ealing Council and it's leadership is sadly, meaningless in this LP consultation process. Ealing Council is Not n a position to take care of the interests of Southall people. There is a serious conflict between the policies the Council wishes to pursue and what peoples's needs are. Ealing Council is Not in a position where it's prime concern is to take care of Southall's needs. Ealing is driven by it's own policy of continued development, tall buildings/ towers to the extent there is a conflict between it's other aims for example claiming to preserve green space or encouraging community cohesion.
11. Southall people have not been given sufficient time to meaningfully contribute to discussions around the LP. On 12 January it was evident to the council officers and the 2 / 3 councilors present that Southall people were absent at the Walkabout. Three of us residents were there because I sent urgent messages to people who might be available locally and one man was there because he knows councillors in the community faith buildings.

GENERAL COMMENTS - THE SUMMARY OF THE DRAFT LOCAL PLAN BOOKLET

1. Apparently the Summary Booklet was published in 9 languages and would have cost thousands of pounds. How effective was this in getting this diverse group of people / communities to respond throughout the borough? Especially , where 86% identify as non-white (p.20). Oddly enough, by the time we were at the Southall Workshop on 12 January Ealing Council had run out of Summary Booklets in English! The very people who could and wanted to engage could Not be given a Summary Booklet in English at the Southall Workshop.

2. What happened to all the Summary Booklets in 9 different languages? How did those people manage to respond? These ‘other languages’ Booklets were nowhere to be seen in Southall library. Were extra staff called in to libraries to help people to access the on- line LP? Was there any appointment system at the libraries to help people? Was any public interest shown or enquiries made in libraries? Why Not?
3. As I stated before (12/01/23 letter), it was evident that no progress could be made at the Southall Workshop , due to lack of : Southall peoples’: attendance,understanding,knowledge, information, preparation, transparency etc. and no proper regard for Ealing’s own statement: ‘Southall is one of the most diverse.....86% ... non-white...’ (p.20). Is the Council really “consulting” within the true meaning and spirit of Regulation 18 ? Does it really want to genuinely consult people throughout the borough? Have they genuine regard for prevalent inequalities which are barriers to engagement in civic processes? Are people like me too probing for Ealing Council lest we should highlight serious issues impacting the public? Is that why initially council officers indicated that it was possible to grant a time extension, but on reflection refused, because it would operate to give us time to question and challenge the LP.
4. Reference to “Genuinely Affordable” homes, basically admits that ‘Affordable Homes’ are really Not affordable. In truth , the only truly affordable homes are London Affordable Rent and Social Rent housing (council housing). In any development there is less than 35% ‘affordable housing’ provision. The remainder is private. Further , developers keep below 35% otherwise financial viability calculations are subject to scrutiny. There is barely any social housing provision. Then there is the reference to ‘...50% going to affordable housing’’. What does that mean ? But, ‘affordable housing’ includes shared ownership private sales, involving payment of rent + mortgage+ service charge, making it unaffordable for many as well as buying a depreciating asset - a lease and risking negative equity in the future. There is no transparency in so called ‘affordable housing’ or ‘genuinely affordable’ which is being marketed to vulnerable communities in Southall who are lead to believe the new homes are for them. They do not understand all the terms and nuances being used to effectively sell ‘affordable housing’ to them, which in reality they cannot even hope to access.
5. The contradiction is that the vulnerable communities are suffering the added severe pollution from new builds that have a high carbon foot print as well as toxic air pollution disturbing the industrial land, brown fields and historical landfills around the railway lines cutting through Southall and old factory areas, whilst the onslaught of overdevelopment, granted permissions for Tall Buildings / towers/ high density buildings will be for the financial gain of investors, developers and the Council’s S.106 funds that Southall hardly gets to see. Further, the Covid pandemic highlighted poor health outcomes for the people of Southall showing a direct correlation to high poverty indicators. The density of Southall’s population cannot be allowed to increase further. Land and air is finite. There are physical limitations in this dense urban low level build environment.
6. Southall objects to overdevelopment, increased density of population, increased toxic air and noise pollution all affecting our sense of space and place. And Southall people object to the way Ealing on the one hand discusses their poverty and poor health and insist they need to be more active and get on bikes and at the same time add to suffocating conditions of building on landfills and adding to toxic contaminated air. Increased population requires more buses and bus routes.

The fact is there are so many buses and all packed. Full capacity has been reached , so people are forced to start cycling!

7. But, Ealing are forever trying to create jobs in Southall. Southall had many industries and factories in the 1970s' . In 1990s' they struggled on, but there was never any infrastructure investment between 1980 to date. Those companies and industries could not hope to develop and flourish in a town bereft of any central municipal guidance from Ealing supporting internal roads infrastructure. The situation continues today and Ealing is still struggling to support light industrial development and job creation. It's also refusing to go ahead with the South Road bridge widening scheme at the top of The Green, even though it is needed because of the station and many developments around Bridge Road , Merrick Road, The Green etc. Indeed the road widening scheme could provide construction jobs locally and apprenticeships in association with the new construction college on Beaconsfield Road. There are a number of light industrial business (Ealing say 400 with 4,000 jobs). Those industries could expand , but road infrastructure or lack of it hold back business expansion. But, In the case of Bridge and Featherstone Road Industrial Estates tall buildings / towers are encouraged, that in turn increases population which adds to congestion and overcrowding. That becomes a challenge for the industrial businesses who are loath to waste time, money ,petrol etc. being stuck in Southall's narrow roads. Ealing has no clear strategy how jobs can be created against the background of the these challenges. I reserve my right to make further submissions in this regard. Economic reports on Southall jobs and industries were referred to in the Southall Reset papers. My letter 28/09/22 refers to the same.
8. Ealing continue to aim for more growth. 'Growth' in housing, 'Growth' in population. But, land and resources are finite. Ealing has Not explained where " new growth" will come from. Does Ealing really have the ability to create growth opportunities? Or are we supposed to accommodate our social needs in the borough ? Provide for what we need, which is social housing / council housing.
9. The 2014 Opportunity Area Planning Framework (2014 OAPF) directed, Ealing to create 3,000 new jobs in Southall. How many jobs were actually created? In what fields , industries , job types , duration: P/T or full time? Have any statistics been released for analysis? It is believed that to date the target was never reached. In September 2022 Ealing Council's web site referred us to GLA web site which advised a further substantial increase in housing (in the Opportunity Area) and appeared to re-state / repeat the figure of 3000 jobs on the basis that the original target was never met! Why not? What are the obstacles and issues here? Why was no proper progress made? What efforts were made to engage and support local businesses and industries to develop, expand or diversify during the passed 10 years?
10. Only, if the Council analyses the Whys and Whats ? will it understand what needs doing. There is no point blindly allocating sites for expansion or intensification. There is insufficient detail and information to support a target of 3000 jobs. A target was set in 2012 / 2014 and believed to have never been met. Why not?
11. At this juncture , it's worth noting that large sums have been spent on the heritage site building, Southall Manor House. It has been sitting vacant for 13 years. Ealing refers to available work spaces and 'in the meanwhile' leases, but in truth it's a smokescreen. Various proposals come and go e.g catering college. Why have all efforts failed? Why can't we use the existing building belonging to Southall for our community space ? This is a genuine complaint. In the Southall Reset papers (August 2022) Ealing advised it would spend a further 250,000 thousand pounds on repairs on the Manor House. Detail is always lacking

12. If the Council need ideas , why don't they carry out proper detailed consultation and engagement in the community. Southall Manor House is an important heritage asset. We wish to use it for a community room to form a Southall Civic Society who can engage on behalf of the Southall residents.
13. Please consider that the people who tend to stay in Southall to work are mostly women with young children. How can we use the Southall Manor House as a place of work? None of the Council's ideas have worked so far in 13 years. Can you publish what are your considerations as to the type of use bearing in mind costs and affordability of women on part-time or lower incomes. We want our asset to be used in the way that we choose. If we find a way forward we will need your support for that group or use.
14. People like me / us (on behalf of Southall people) cannot be expected to keep reading Cabinet Minutes and documents or writing freedom of information letters in order to wrangle out information to find out what's going on in relation to planning, jobs, Metropolitan Open Space (MOL) or Green Belt (GB) or Public Open Space(POS) land.
15. 3,000 jobs in Southall? Is that realistic ? Is it achievable? Is it based on any ideas or plans drafted over the last 10 years? Is it even worth the paper the words are written on ? It is infuriating to read these kind of hollow statements or intentions. It is noted that there are long term plans (GLA web site) to create some 70,000 jobs in Park Royal (HS2), 100,000 in Canary Wharf, ?12,000 at London Heathrow and thousands more in Paddington and environs. Southall jobs will continue to be stunted so long as proper infrastructure is ignored. Without supporting infrastructure jobs cannot grow.
16. The density of population is extremely high and Not sustainable. Urban density makes it impossible for easy transport and manoeuvre. The roads and broken pavements are as a matter of fact too narrow in this old Victorian working class town and there is little one can do, unless there are major road / pavement widening schemes. None are proposed, except the South Road bridge widening scheme which was abandoned by Ealing in their Southall Reset papers and sent to the London Mayor for approval in August 2022. Construction jobs / apprenticeships could have been attached to the road widening scheme instead of shelving it. Southall people wish the South Road widening scheme to be reinstated. It was negotiated for many years in connection with the Gas Works site. There will be more people. More buses. The road over the bridge at Southall Station must be widened. Southall people never asked for the money to be re-allocated to cycle lanes and free bikes!
17. People will be travelling on buses and trains for the thousands of jobs that are in the pipeline and actually being developed. They will Not be cycling. As the Council states 86% of Southall people identify as 'non-white' and the diverse immigrant communities have their own cultures and cycling is not part of it. The Council are spending millions on cycle lanes imposing a cultural change on the people on the basis they have health issues and overweight, but still fail to understand that they happily walk, but do Not cycle. The parks in Southall are well used , particularly since Covid. People are taking care of their food and health. Holland and Barret (health shop) responded to a demand of Southall people. It was a business response. The Council did Not play a part in bringing this retail chain to Southall. Detailed explanations were given in my letter / representations being 49 pages (28/09/22) to Ealing when responding to the The Green Southall CPO 2021 as to why Southall people don't cycle. I prepared a summary type of index to the letter dated 17 October 2022 submitted

to the Planning Inspector. Many matters stated are still relevant to the draft Local Plan 2023. I have already

sent by Special Delivery a copy of the 28/09/22 letter. When I return after my vacation I shall forward a copy of the Summary type of index dated 17 October 2022¹ for completeness.

18. The Booklet sets out Ealing's dreams, what it plans to do in the borough including Southall. They want growth, business space, intensification of industrial areas, creative industries and encourage night time economy. They want efficient use of land, good design and amenity, necessary physical, social, and green infrastructure, vitality of town centres be maintained, retain vital buildings for public use etc.(listed on p.5). Tackling climate crisis through 20 minute towns (p.06) Fighting inequality. Covid pandemic revealed different income group struggles and vulnerabilities. Higher income groups could work from home and still do. Unilaterally designating Southall as a 20 minute Neighbourhood is Not realistic. Southall's predominantly lower income groups travel to work evidenced by the well used Southall BR Station and Elizabeth Line and all local buses on the intersection of Uxbridge Road, Lady Margaret Road and South Road taking them in every direction. Poverty factors are such, people don't take a bus if it's just 3 /4 stops , they can't spare \$1.60. They would rather walk or find a short cut. Families walk with push chairs, shopping and children in tow. The cycle lanes built recently are Not used. Does the Council have any evidence to support the cycling policy? The Council pushes it's policy of cycling through 'Lets Go Southall'. So much so, that during this consultation period , Ealing has promoted stands for 'Let's Go Southall' on The Broadway , but No stands or large presentations to support engagement by Southall people in this LP.
19. People throughout the borough are worried and concerned the way their area is changing. Southall more so. Southall's population in 2011 was about 70,000. The population of Ealing borough increased by 8.5% , from around 338,400 in 2011 to around 367,100 in 2021 (ONS 2021) . The LP continues to reference Southall's population as 70,000. The covid pandemic caused a shift in population in London and arguably , higher income groups in Ealing were able to leave London and 'work from home', not Southall residents. Part of Southall's immigrant communities are transient and a fraction of the population is 'hidden'. But this transient population ebbs and flows constantly, but is not always recorded. Applying a straight increase of 8.5% , gives Southall a population of about 76,000. Taking proper account of the increase in housing , new builds , towers, high density blocks , Gas Works / Green Quarter , Bridge Road , Merrick Road and the already undocumented transient population , we can arguably settle at Southall currently having a population of at least 80,000. The people of Southall suffer mental stress from overcrowding dense urban build in an old working class Victorian town with narrow streets , roads , broken pavements and onslaught of so called "affordable housing " in high intensification tower blocks hemming them in , not to mention limited water waste and sewage infrastructure as well as water supply and electric capacity. The roads and streets are heaving. It's a nightmare for the disabled and elderly. Ealing's older population has increased by almost 20 % (ONS 2021). Thousands of people over the age of 40 (otherwise healthy) have small ailments that prevent them from cycling , even if they wanted to.
20. The main road pavements are generally narrow. Too narrow to accommodate a population of 80,000 (see above) expected to increase by 20,000 over next 5 years , if Ealing continue to force it's development programme on Southall . The Broadway pavements cannot be widened any further.

Where there is some space on The Broadway pavement, benches or large plant pots have been placed increasing the level of obstructions. Walking is difficult. Shop keepers, bazars, vendors all come on to the pavement forecourts. Ealing continues to encourage shops splitting into further units. Often it's necessary to step off the Southall Broadway kerb and walk in the gutter. At the same time Council encourage tourism. No account is taken of the everyday tourist / visitor population in Southall. It's a very stressful experience.

21. There is a disconnect by Ealing Council as to how Southall should be guided for future improvements in living, shopping and working environment. There is no understanding of the dominant nonindigenous English cultures in Southall. 40% of the borough identifies as Asian or Black. Shops break up in to units (in Southall) out of necessity to allow 3 / 4 people or more to earn a living and achieve an affordable shop rent, Not because they want to run an eastern style bazar. Our diverse communities like a sense of modernity (not cycling), a sense of moving forward with the times. By encouraging too many bazar styles and vendor stands the communities are being held back and encouraged to be insular. Insular communities. That is what young people in Southall will escape from (leaving behind an aging population). The young Punjabi people do that already and they will continue to do it and others will follow suit.
22. Southall Broadway shopping area has developed in to an Asian shopping centre with various specialisms. It's attraction does not wane for visitor shoppers. What plans do Ealing have to bring in anchor landlords or other chain stores? The development plans by Ealing for Southall are unacceptable. Southall has been pushed to the brink. Businesses are also suffocating in the cramped environment. The High Street is over populated. There is no relief from the narrow, broken, uneven and filthy pavements forcing us to easily step off the kerb and walk in the gutter where it's more level and less chance of tripping. We then come outside Lidl relieved with space to walk. After that the pavement narrows again up to the Red Lion / The Terrace pub.
23. The Council propose making a Pocket Park in front of Lidl / Market to make some space for 'rest and play'. There was no consultation and if, there was one they would learn : it's a waste of tax payers money, Asian / Eastern women don't sit on shopping streets with their children or alone, Southall Park is just 3 minutes walk away, there are 2 sufficient benches near the bus stop, it will attract antisocial behaviours and it will remove our sense of space and safety which is now extremely important.
24. The recent new builds, developments, Tall buildings, tower blocks etc have combined to take away air space and create a claustrophobic environment. Land is finite. Space on the ground cannot be created. Air space is being removed. Green space is being removed or filled indirectly. The density of population has increased in a town, which was a suburb with it's own industrial 'life' with the old factories and London Heathrow nearby. The conflict is the offer of so called 'affordable housing' which is actually tower blocks bringing in more residents that cannot be accommodated in the limited area / space of Southall streets. The flats are Not affordable for the average income person / household in Southall, which has some of the lowest annual earnings throughout the borough. Ealing have the Reports confirming the data. Southall is afflicted with the poorly paid jobs as is common in food and catering industries. The predominantly 1 / 2 bedroom flats (even if a couple manage to pay the rent) are not suitable for family oriented Southall people. Yet Southall families are expected to suffer overcrowding, overdevelopment, construction pollution, disturbance of landfill sites, car

parks , contaminated land toxic fumes, poor health , claustrophobia, mental stress, lack of supporting infrastructure etc. so that foreign investors or higher income groups can buy the flats to rent out. And Southall people are then told how sick they are and to start cycling! These developments are Not for the benefit of Southall people and they will be objecting at every opportunity. People like me /us are willing to check the Council's data and reports and properly challenge / answer when giving 'feedback' to Ealing Council's proposals for the borough and in particular Southall.

25. Air quality is of concern , but this is directly related to excessive developments, construction on contaminated land and historical landfill sites. The land around the rail tracks at Southall is mostly old industrial contaminated land, yet it's earmarked for further high intensity development projects. Construction itself has a huge carbon foot print. People of ethnic origin (Asians and Black populations) 40% in this borough are more prone to respiratory disorders as evidenced during the pandemic. The old landfills must not be disturbed and release toxic substances to harm people who are already vulnerable and suffer high poverty indicators. We have yet to contend with further Phases of development on the Southall Gas Works site. That experience of air contamination in 2018 / 19 onwards was terrible and people suffered needlessly and all complaints fell on deaf ears at Ealing Council. That error in disturbing and developing contaminated land , land fills and brown fields cannot be repeated.
26. The Council should be concentrating on retrofitting and refurbishment of old blocks and buildings. The Green Quarter / Gas Works site is still in phased development and clean air / toxic air issues continue to be a serious concern 5 years later. If more developments are forced on contaminated / industrial land , it is likely there will be on going pollution issues during development and for years after. And people's health will again suffer putting more pressures on their mental wellbeing.
27. Ealing tries to put forward an argument that residents are required to deal with the climate crisis by cutting down driving and cycling instead and they are proposing a 20 minute town in Southall. People have cut down on small journeys. People walk and bus more. Cycling ? There was never any consultation for this social experiment on Southall. Southall is Not suited to the 20 minute neighbourhood as envisaged by Ealing. The main reason being that Southall people will walk 20 minutes to access services, shops , green spaces, faith buildings etc. It's a close community providing many specialist local shops. Our concerns:
- There is already a 20mph road speed imposed across the borough. There are more electric vehicles. Car pollution is no longer the terrible culprit □ Many people have cut out short car journeys □ People hop on the bus easily.
 - There are more buses than ever before. Over the past 50 years , using the 207/ 427/607/195 routes are all busy all of the time.
 - Thousands of us residents in Southall and businesses don't cycle due to various reasons. Perhaps an injury ? mild disability? Age? Pushing pram , children , shopping? We tend to walk or bus it. That is a fact. Ealing is determined to give Southall sweeteners e.g giving away 1000 bikes since last year. This year they are giving away lap tops! It's distracting attention from the serious business of the LP before us now which will affect every area of our lives over the next 15 years.
 - Ealing have managed to get a group of Asian women cycling (about 200) and consider they have broken down barriers to cycling. They have not. What is 200 out of a population of

80,000? That is not to say that Asian women don't cycle for leisure. Some do in our local parks, but it is not an everyday mode of travel with children and shopping. In cultural terms women with long traditional dresses do not cycle around. Ealing has no right to keep forcing and imposing cultural changes to suit their own political goals.

- We were never consulted properly. Cycling lanes are being laid everywhere at huge expense to the taxpayer. We are not cycling. We walk on the cycle lanes. People push their prams on them. Cyclists ride on and off the pavement as they choose and race down Uxbridge Road without bothering to tuck in to any the cycle lane.
- Ealing Council refers to the Shaping Ealing survey, saying that Southall is concerned most about "walking and cycling". At the presentation by the engagement officer at Southall Townhall 28 /07/22 ? I explained issues around Ealing's belief that Southall is 'cycling' everywhere. It was pointed out by everyone present at SCA that we don't cycle everywhere. It was pointed out the Shaping Ealing question was loaded. There should have been 2 separate questions : one for walking and one for cycling. Ealing would have learnt that the public realm for walking is the issue: broken, uneven and filthy narrow pavements are a safety hazard. We easily step off the kerb to walk safely in the road side gutter.
- We stand on the cycle lane at the floating bus stops. The cycling policy is not working.
- People are buying electric or hybrid cars. They have started using charging points.
- Ealing have never explained exactly how they will get to carbon neutral by 2030.
- We still have cars. We still need them for our families. Women have many domestic obligations including heavy shopping, taking elderly / sick, less able to medical appointments.
- Southall doesn't provide all facilities and services. It's necessary to go around the rest of the borough. Ealing is trying to hem people in, as if it's a social experiment. Going out of Southall for shopping is an activity, even a family outing for many. Necessary grocery supplies can be picked up easily and it is evident throughout Southall.
- Southall people have been doing 20 minute / 30 minute trips for shopping or chores for many years. Walking from the Broadway side to King Street has always been an easy walk to the library or church or Havelock Gurdwara, provided you don't have heavy bags and young children, in which case people tend to get the bus.
- We have grave concerns that the long term policy is to separate the towns in the borough and try to digitise each person and put each town in to a Zone to force us to limit our carbon foot print. Or pay a fine. Digitising us is a way to measure our carbon foot print. But that would be tantamount to interference with freedom of movement. Ealing Council have no mandate to impose such restrictions. There is little confidence left in Ealing Council, because London Mayor's politics is rolling out ULEZ. As time goes by and without full details from Ealing their 20 minute Neighbourhood is beginning to show its true colours and Southall people will object to this social experiment.
- There has been no consultation with Southall people. No transparency. Ealing has no evidence of any demand by Southall people for cycling lanes and cycle facilities. That is not to say people reject cycling as part of leisure activity. Cycling is Not a way of life for Southall people. This is not some town in Surrey. People, generally walk or bus it! Density of population means they walk and push their prams on the new cycle lanes.

28. Ealing has been promoting cycling heavily through it's "Lets Go Southall". In the first week of January 2023 Ealing Council held a stall on the Broadway for "Let's Go Southall" or cycling, but

made no such effort to inform or notify the public of the Ealing LP for Southall and its consultation.
As at 7

February Ealing Council has indicated / directed there will be no time extension beyond 8 February.

29. Southall people opt to walk easily. They go for early morning walks and after dinner. Some years back there were proper consultation about improving our parks. I have been using our parks all my life here. There was a time the parks became run down and not used. Since during and after Covid the parks are well used. They have some outdoor gym equipment which is well used. We have reached a stage where elderly ladies with a walking frame are out walking on their own as well as young women with children. It is a success story! I do not understand any concerns about parks safety, unless there are pockets of anti-social behaviours or perhaps the kind of people responding to on-line Shaping Ealing are people who are not busy walking. Over the passed few years I have persuaded a number of friends to come walking. Ealing should consider:

- the level of rubbish in bins (clear indication the parks are well used)
- Improvements in the gardens
- Rodents / pest control which is out of control year after year.

30. Southall has been ignored by Ealing Council since about the late 1960s. Actually ever since its municipal administration passed from the ? Southall Town Hall / Urban District Council. Throughout my life Ealing Council has Not played a significant part in supporting positive development and planning in the town except in mid / late 1960s when the Golf Links Estate in Dormers Wells Ward was built and possibly other smaller estates. After that period there was very little new housing despite a steady increase in population, particularly the Asian migration from the Indian subcontinent. The recession of the 1970s and social unrest brought racial disharmony and to Southall culminating in widespread rioting in 1979/ 1980 ? Since then Southall has always known it must take care of its own and we built our: faith buildings, social structures, community groups, factories and businesses creating an amazing dynamic community cohesion. None of it was led by local government except when they were forced to help e.g the Dominion Centre in The Green, but even that was with strings attached where the Council did a 90 year lease back from 1984 against the freehold of The Indian Workers Association (IWA) a community organisation. The 1990s saw the start of the Right to Buy rented property from the local authorities across the country. Ealing Council began to lose housing stock. There were no measures to replace housing stock and no planning for the increasing population and extended family structures. But, Housing Associations were introduced to start managing the housing stock and engage in new developments, but their properties were also subject to Right to Buy. Housing Associations were encouraged to take a commercial stance rather than social from about 2000 onwards. Many Housing Associations have formed close links with private developers over the years sometimes in the belief that the private developer has a social conscience who started out providing social housing, but by the 21st century have adopted commercial practices forming sister companies / outlets which emphasise financial viability and profit.

31. The housing market is broken. Ealing Council need to meet new housing quotas and they have been following this policy aggressively since about 2012. The Authority Monitoring Reports (AMRs) give data on not only housing and number of planning applications in the pipeline, but also details of

- Housing Land Supply, population, and amount of green space or Public Open Space (POS) per 1000 people. 2014 was the last time comprehensive housing information and data was given for the borough. Ealing Council was then forced (by the Ombudsman) in 2021 to produce further AMRs. A summary for years 2015 -2019 ? was published. Still there was no 5 year land supply data. How can proper housing be assessed without the required data? My letter (together with exhibits) dated 28 September 2022 refers in detail to AMR and Exhibited the analysis by Ealing Matters in October 2021. Ealing has exceeded its housing quotas as at 2021. The AMRs continue to use the population figure of Southall as 70,000. The levels of POS (shown in AMRs) is abysmally low for Southall.
32. The ONS 2021 data analysis is now highlighting increase in population density in the borough. Southall is suffocating with people, buildings, pollution, noise , overcrowding etc. People like me / us find huge comfort in our gardens like never before. If we find so much relief what about all the other residents in flats and high intensity tall buildings / towers?
33. Ealing Matters (Kay Garmeson) has recently produced a further analysis of housing and planning applications data.² Ealing have again provided a list of Development Sites for each of the areas in the borough. I give notice that I will refer to this data prepared by Ealing Matters in the future making further representations why we in Southall are overcrowded and reached full capacity. I do not have the time to study and read the efforts and data prepared by Ealing Matters² There is no more space for further developments as planned or designated by Ealing Council. Further, the Council cannot be allowed to reduce our green spaces any further. It should be noted that the AMR 2014 ? (p.54) referred to POS data for each town. Southall Green has very little along with South Acton.
34. Detailed representations need to be made about Ealing's new found method of de-designation of Metropolitan Open Land (MOL) and Green Belt (GB) so as to make way for future development of open land. Even Ealing acknowledges that developers will wish to build on cleaner land i.e our open spaces because development of contaminated land will be far more expensive and riddled with toxic air issues forcing the Environment Agency involvement. Ealing has identified many green areas for de-designation. People need time to respond , indeed object. Cynical , I may be , but I believe Ealing has good reason Not to give the people more time to respond. After this 'deadline' of 8 February , I will submit further representations on removal of green space because it is a matter of utmost importance.
35. Ealing Council refer to Shaping Ealing 'survey' and that Southall states it wants more "affordable housing". What does poverty stricken Southall really mean by its innocent understanding of those two words: "affordable " and "housing" which are being constantly politically manipulated to meet other agendas? Poverty stricken Southall needs and wants a programme of Social Rent / Council/ London affordable rent housing. There is hardly any (almost none) in the developments or designations planned. "affordable housing" is a misuse of words. Ordinary people do not understand the meanings given to these two words in planning terms. Ealing Council understand this point and know exactly what ordinary folk mean when asking for a rent they can afford to pay.
36. The housing offered by these new developments is 'intermediate' housing , shared ownership , private sale mostly to investors and foreign buyers. Ealing recently congratulated itself that some 50,000 Honk Kong people are now resident in the borough. This figure has not been accounted for in ONS 2021 data. Further, Ealing borough is the second most desired place to live by Hong Kongers. In

Southall we have witnessed coach loads of people who appeared to be Hong Kongers visiting the Green Quarter. Southall has always welcomed communities and people from all over the world. But, seriously, Southall has reached full capacity. The only reason the development sites were concentrated on Southall is because, poorer immigrant communities' land was less desirable and therefore cheaper and financially viable for developers to achieve 20% profit margin.

37. Any housing development is subject to the developer working on roughly 20% profit margin. This is after taking account of S.106 money paid for community matters e.g NHS clinic or pollution. The Contradiction here is brown land, landfill sites, contaminated car park land is disturbed, we suffer contamination and pollution along with serious respiratory condition aggravating existing dispositions or conditions etc. The money given under S.106 is actually compensation for the damage to our health (our children's health) and that's also why there is a contribution to local NHS services. It's for adding the burden of more population and induced ill health. And then we are told to get on our bikes! This has got to be the biggest Contradiction of the century and none of our political leaders have the courage to see it for what it is. Ordinary people need time to understand what this Local Plan means for them and how it will affect every aspect of their lives and even rate of our mortality in this town. And then Ealing has the audacity to quote how Southall has the worst mortality rate in the borough and why we need 'affordable housing' and in our over populated green space tackling environment full of pollution should go cycling everywhere and remain in a movement area of 20 minutes neighbourhood! It's even more shocking having to spell it out here.
38. S.106 money is taken by Ealing in a fund used for all parts of the borough. S.106 money is Southall's sufferance payment e.g thousands are paid to acknowledge the level of pollution caused to the community to enable cleaning up contamination or more NHS appointments. This is a direct consequence of discriminatory practices effectively.
39. What I have written is a genuine real concern on behalf of the people of Southall. I am on vacation still, but compelled to make the deadline so that these representations are taken into account under Regulation 18. After sending this letter to the Council, I will circulate the copy as far as I can to anyone who cares to read what needs to be put forward. I attended the Southall Walkabout and the Workshop 12 January. We listened to every word spoken by the engagement officers, the detail given by Steve Barton, the 2/3 Southall councillors. It was an eye opener. We complained bitterly about how Southall was not given enough proper notice. No presentations. No translation booklets in the Library. Southall has to be given a fair chance to respond to this 'consultation'. We have been deprived of a proper meaningful consultation and we shall complain to the planning inspectorate in due course if need be. If Ealing, now decides to give a time extension, it will demonstrate just how hard we have to fight for everything.
40. On the Southall Walkabout the cabinet member (Southall councillor) responded to our complaint that proper notice of the local plan had not been given to the people of Southall taking account of high poverty factors and digital exclusion issues that Ealing now recognises (by giving away free lap tops). She explained that councillors had spent time at the local gurdwara (temple) to explain the local plan and how important faith communities are etc. So why did nobody come from the temples, gurdwaras and mosques? Southall has a population of 80,000 (Ealing says 70,000 static since 2014). How many of us are regular church / temple goers who sit and talk to our councillors? Only a

handful. Most younger generation do not engage with councillors and Ealing knows that. Frankly , we are being made fools of. Only an Asian from a lifetime in Southall can say this honestly and mean it.

41. Did the cabinet councillor or any Southall councillors explain in temples , mosques, gurdwaras , churches etc and the few schools they visited what disturbance and development of landfills and brown land really means in terms of ‘affordable housing’ / high intensification towers, pollution , health outcomes etc? I don’t think so. Southall has not been genuinely and truly engaged in this consultation, yet Southall will bear the greater brunt of the planned designated sites for development. Ealing may have more, but ‘Ealing’ covers West Ealing and all parts of Ealing taken together is a larger area than Southall. But the developments for the size of Southall are excessive.
42. Once these sites are marked, designated / passed in the LP , the developers will come forward and collaborate with Ealing to build tall high intensification towering buildings. The Southall communities who live mostly as families / extended families need houses , maisonettes or low level build housing with appropriate garden / play space.
43. Ealing have advised at the Workshop (12/01/23) that they intend to outlaw all planning applications consisting of 9 or less units. That means that low level 2 / 3 storey blocks will be outlawed. Why? Who made that decision? What impact will it have on smaller developers or working builders and labourers work force in Southall? Companies such as Hansons, Selco , Screwfix, Tool Station , Builders merchants e.g B & B Builders were attracted to Southall because there were so many middle layer developers or builders. What will happen to that in commercial and job terms? Have jobs been protected? Did Ealing Council have any mandate for this decision? No , not that we know of. None of these changes were ever disclosed during the local elections , except ‘more affordable ’ or ‘genuinely affordable’ housing which we now know is not really and truly ‘affordable’. A huge Contradiction being pursued by those who are governing us.
44. I give notice that various matters stated in my 49 page letter dated 28 September 2022 , where relevant in relation to this LP will be referred to in due course. There are some 20 Exhibits attached to that letter and I refer the Council to the same at this stage of the Reg. 18 consultation.
45. The Development Management chapter refers to building heights in different parts of the borough. Southall Green is put at no more than 6 storeys height. At the same time the planning officer stated at the Southall Workshop 9 units or less (in a block) will be outlawed. Am I confused? Did I misunderstand? There are so many Contradictions everywhere scattered throughout. It’s a mess and difficult to follow through. The LP is Not fit for purpose. Anything so hard to follow, but easy for me (with education but No planning experience) to pick through and reason and sensibly criticise is evidence that the LP is full of contradictions and lacks a comprehensive approach. This must be because the Regulation 18 consultation should have been carried out extensively throughout last year so that the prior consultation can properly inform the LP. The draft LP would then be less conflicted and clearer in its objectives.
46. There should not be so many faults so easily identified at a cursory glance by someone like me who has no background in local government and planning. It’s wholly unacceptable and unreasonable to expect individuals like me / us to engage to this extent right across the borough and especially Southall where we are so heavily impacted, have high poverty factors including low level income

groups, qualifications and proficiency in English language. Ealing Council officers and all councillors are paid from taxpayers' money to take care of our interests. To act in the best interests of all our different communities.

47. Any government's first duty is to protect its citizens. The Local Plan raises concerns that are a threat to our mental health and physical well-being. I know about the statutory period of 6 weeks, but against the background of massive changes (decided unilaterally by Ealing Council) across the borough and particularly Southall we do Not have enough time to read, digest, understand and interrogate the assumptions or Reports informing the draft LP consisting of some 500 pages. Further, there are serious issues that we were never consulted properly before the implementation of the Regulation 18 consultation. That in turn raises the question whether this purported consultation is lawful and proper.
48. Taking away green spaces and open space in the borough is something Southall people object to. All open spaces must be designated as being of strategic importance to climate adaptation and nature restoration with commitment to preserving and enhancing natural space. There should be large scale re-wilding to facilitate flood management and biodiversity. Again there is a huge contradiction where Ealing knows the issues we have with biodiversity , bees , butterflies , insects etc. and is failing to preserve our green spaces. The Allotments at Dormers Wells and Havelock in Southall along with others must remain. They must not be included in development sites under any circumstances. CPRE Countryside Charity draft letter dated 26 January 2023³ will be referred to in the future.
49. The green areas around Grange Farm, Greenford , Northolt must remain. Ealing is de-designating MOL or GB land so as to make development of land easier in the future. Southall people object. Ealing Council has already stated that developers are looking for open land / greener land. That is because our contaminated land has too much 'cleaning' involved increasing costs and so it impacts negatively on any financial viability exercise.
50. We object to reducing any Green Belt (GB) land and downgrading it to MOL. We all know GB land has greater protection. Why reduce it to MOL , unless the clear intention is to keep working towards more development sites in the pipeline. Southall and South Acton have very little POS and green spaces. Any green space anywhere in our borough is valuable to Southall because our air depends on clean air being preserved as far as possible. Of course it does. Interfering in green spaces in Ealing , Northolt , Greenford will impact on Southall just as much.
51. Growing up our schools had large playing fields. Over the years (and as a school governor for 17 years) I have watched the impact on school populations causing more classrooms and facilities to be built. Usually open space and green land is taken to build extensions. In this way we lose invisible green spaces. Our children in poverty stricken Southall are also robbed of green space, play areas and clean air. The situation is desperate. Ealing cannot continue to increase population density. It is unbearable affecting our physical and mental well-being.
52. Ealing Council have stated that they will not be implementing Local Green Space designations anywhere in the borough. Further they believe that Community Open Space and POS provides enough

'protected' land or provides the functional protections required. I refer to the AMR 2014 and Summary AMR for the periods 2015 to 2019 as set out in my letter and exhibited dated 28/09/22. I give notice that there is possibly data (held by Ealing Council) detailing how much POS has already been removed since 2014. Please consider carefully any data relating to 2014 levels of green space / open space and compare the same now in 2022/23. Further adjust the data after taking account of the developments that are definitely going ahead and those in the pipeline (granted applications). In this LP measures must be taken to protect Green Belt and make more Local Green Space designations. It is vital for our wildlife and biodiversity. Some years ago Ealing installed new lighting across the borough. The long hours of artificial light is believed to have disturbed insect life and biodiversity. Has the Council any plans to address this particular concern or carry out investigations and respond accordingly.

53. The Council has plans to remove protection of Green Belt (GB) land by relegating it to MOL which has lesser protection when it comes to developments. Some groups and individuals have taken the time

to study the information provided by the Council. I refer to the CPRE Countryside Charity draft letter dated 26 January 2023³ (attached) which I have just read briefly. The Council has received the letter of representations from CPRE. I give notice that I am still in the process of learning about Green Belt (GB) v MOL and only then can I fully appreciate the planned for certain Southall sites and give feedback. It is noted that quite a number of green spaces and GB land is being de-designated. This is all related to making the path of development planning applications easier in the future. Southall objects. Southall relies on any and all GB land in the borough. It's our air supply. We live in a dense urban environment with high density of population.

54. I give notice to refer to ONS data to state how density of population in Ealing has increased. The land mass has not. Ealing's AMR data relating to POS for every 1000 people needs updating. It must be stated that ONS data is a snapshot of people in 2021. Since then a number of developments have been completed. New residents have arrived. Ealing needs to produce the up to date figures so that we can judge the true level of green space available to the people of Ealing borough ward by ward. In relation to 20 minute Neighbourhoods proposed, Southall has very little POS or green space necessitating travel to other parts of the borough. Are Ealing proposing that Southall people are Not encouraged to go to green spaces in other areas of the borough? Will Ealing publish detailed AMRs for each of the years since 2015, so that we have proper data. Further, we need all the housing data to inform ourselves, before giving feedback.

SOUTHALL DEVELOPMENT SITES

55. There are 26 major sites quoted for Southall and there will be other developments or plans to develop by Ealing Council which are intended over the next 5 / 7 years but not yet documented.

SO01 – Gurdwara / Southall Crossrail Station - Provision 18 storeys. Residential mixed- use scheme
Time framework > 5 years

Comment : We can accept it is unlikely to be developed in near future.

SO02 – Park Avenue - generally 18 storeys allowed. Nature area, TPO . Time framework < 5 years
Comment : A high intensity tower block development. Approved and proceeding.

SO03 – Southall Sidings Park Avenue (opp. houses) - generally 18 storeys allowed. Nature area , TPO

Time framework < 5 years (50%) and > 5 years (50%)

Comment : A high intensity tower block development.

SO04 - Sorting / Post Office & Kings Hall South Rd.- generally 18 storeys allowed residential. Remove car park ? Kings Hall Reduced size of Methodist Church/ community use Nature area , TPO
Time framework > 5 years ?

SO05 – Southall West London College Beaconsfield Rd. (sports centre already removed) - generally 18 storeys allowed residential and education. Remove car park ? Time framework < 5 years

Comment :

SO04 and SO05 – together form a major development block at the junction of Beaconsfield and South

Road making huge tower blocks of residential development within < 5 years and referred to as ‘emerging’. The scale is out of keeping with surrounding environment. Kings Hall is likely to be developed in < 5 years ? The heights of the blocks have exceeded the vision of 2014 OAPF. They will be more like 18 storeys + . Given that definition of Tall Buildings liable to be changed, since Ealing Council have been shown Not to keep to planning frameworks in the past.

In reality we expect uncontrolled tower blocks ruining the traditional low level Victorian build. There is further pressures on density of population , overcrowding , lack of infrastructure. Most of all Southall CANNOT accommodate any further so called ‘Growth’. Southall people are suffering. Any further developments will release carbon emissions , pollution associated with construction. Ealing is Not listening to the people of Southall. Southall does object. This type of housing has hardly any social rent / London Affordable housing rents. When Southall people asked for AFFORDABLE HOUSING , they mean truly ‘affordable’ e.g council housing with social rents. Further, they intend to have social housing temporarily because they have deep rooted cultural aspirations to buy their own home. Ealing has Not acknowledged the cultural aspirations of Southall people and that is because the right questions are never asked.

Southall has suffered a great deal of construction these past years. It was an onslaught that emerged from nowhere during Covid. It was shocking. Consultations were occasionally carried out e.g at Villiers (that none of our councillors attended) and passed despite objections. Ealing believes that allowing private developers to simply distribute 2,000 flyers satisfies requirement of ‘consultation’. But , what if no flyers have been delivered in the area. The population is around 80,000 rather than the 2014 figure of 70,000 (already explained) and supported by ONS 2021 data re. increase in density of population.

We have family and friends around these sites. How come we never received any flyers or letter re. any consultation? How did we lose our parking (near the Market) so easily ? How come we lost our historical Southall Market? Why could the Old Market not have been refurbished and set up to be an attractive cultural market and international food cafes worth visiting for people across the borough? The heart break is that when Ealing does manage to consult us (or when its left to developers) , our objections and please are ignored. This complaint must be stated because it applies across the board.

SO06 – South Rd., Tel Exchange & Iceland - generally 18 storeys allowed residential and retail ground floor. Remove car park space? Nature area? **Time framework > 5 years**

Comment : Once the other high intensity tower blocks are up these are likely to exceed 18 storeys. There is no obvious green space here , but reference may be to the green verge and trees on Avenue Road.

SO07 – Herbert Rd. Car Park - generally 18 storeys allowed residential and retail ground floor.

Remove car park space? **Time framework > 5 years**

Comment : Once the other high intensity tower blocks are up Ealing will proceed with this development. It's likely to breach the said 18 storeys. They have shown how they have the power to ignore guidelines in DPDs , SPDs , 2012 Local Plan , 2014 OAPF , Tall Building policies of London Plan etc. Further the car park is still very much needed to support the Southall town major.

SO08– Fairlawn Hall / Conservative Club - generally 18 storeys allowed residential with mixed use.

Remove car park space? **Time framework > 5 years**

Comment :

Once the other high intensity tower blocks are up Ealing will encourage development at this site. It's likely to breach the said 18 storeys. I have not had time to examine what a Tall Building definition is in the Local Plan. I believe a Tall building far exceeds 18 storeys. What is difficult to comprehend are the contradictions or various information stating 6 / 8 storeys height is the maximum for low level build Southall. But then at the Southall Workshop we were told that new builds of 9 or less units will be outlawed because these smaller developers / developments are a 'loop hole' as they don't need to provide affordable housing. Further, that many as 50% planning applications are for these smaller developments and Ealing want to stop low level build in this way. But, Southall people have never asserted this is what they want from Ealing. Indeed Southall , with it's characteristic low level incomes, lesser education qualifications etc. produces a large number of physical workers , blue collar , and many builders and labourers and semi-skilled in construction work. Ealing recognised the Asian construction industry workers and supported the West London College on Beaconsfield Road to close the womens' only Gym and have a Construction College. There is no consistent approach. I am struggling to follow through and see a coherent approach. It is Not good enough to present so many conflicting approaches. Quite apart from this , dealing with jobs , how many labourers , brick layers, carpenters , double glazing , builder and timber merchants are going to lose their jobs locally. Certainly , here Ealing is planning on taking away work / jobs from working family men. What is going on?

SO09 – The Arches Business Centre Merrick Rd. - generally 12 storeys allowed residential with light industrial offices and commercial mixed use. Remove car park space? Nature area?

Time framework > 5 years Comment :

SO10 – The Limes, Community Banqueting Centre, The Bank 13 -19 The Green. - generally 12 storeys allowed residential with commercial mixed use with health and community. Remove car park space? **Time framework < 5 years**

Comment :

Will Ealing / Can Ealing keep to 12 storeys height? We don't think so. They have shown their noncompliance and so far we have little confidence. Here Ealing has ignored the requirement of 2014 OAFP giving Permission 216215Full for 23 storeys at 13 -15 The Green at the corner of the roundabout by the station whilst abandoning the infrastructure of South Road bridge widening scheme. The developer is ready to start immediately except they are waiting for Stage II London Mayor approval. Further, we don't accept that this development will only happen in 2030 ? As soon as a few more towers are up , this will be progressed by Ealing. Ealing Can't blame us for having trust issues after the way Southall has been treated during the past number of years. Southall is suffocating with this level and rate of development and consequential pollution and damage to community cohesion.

SO11 – Middlesex Business Centre - generally 18 storeys allowed residential with commercial mixed use with health and community. Nature area? MOL ? Time framework < 5 years

Comment :

In reality this will be Phase 1 of the development at the Middlesex Business Centre for which outline consent was granted in 2019 to build 2083 homes in 13 blocks up to 27 storeys high. Gone up from 18 to 27 storeys! This makes no sense. Merrick Road and Bridge Road are about to have a huge development of 13 high density towers . And Southall is unaware. How shocking is that.

Next door is the Honey Monster scheme which will be very similar and deliver 1997 homes.

Very different from the 2014 OAPF which says inter alia:

‘The majority of the residential area will be within 400m of the Crossrail station and can support relatively high densities through mid-rise (4-8 storeys) flatted development. This approach supports human-scale streets and creates an appropriate transition to the suburban character of the Havelock area, and the mix of building styles in the industrial area.’

The London Plan explains at Para 2.9.2:

‘Town Centre Strategies should be tailored to each town centre. A clear vision should be developed with the local community, taking account of the town centre’s strategic role, opportunities for growth, potential to support regeneration, spatial characteristics, economic challenges, and location in inner or outer London. Strategies should also consider the role of the night-time economy, as well as the cultural, heritage and tourism characteristics of the area. Town Centre Strategies should cover a broad remit, co-ordinating a tailored approach to planning, environmental health, licensing, Healthy Streets, transport strategy, highways management, logistics and servicing, regeneration, air quality, investment and projects. They should be developed with input from relevant stakeholders, including TfL, commercial landlords and investors, Business Improvement Districts and business associations, social infrastructure providers, Historic England, and community and amenity groups.’ (our emphasis)

Also consider the Today. News Article 05/01/23⁴ [Ealing's Local Web site \(ealingtoday.co.uk\)](http://ealingtoday.co.uk) informing the high intensification developments increasing population density in an area lacking in POS , green spaces with no infrastructure in place. Time framework < 5 years

At least 5000 new homes are about to be built within the next few years. On average in Southall each unit will have approx. 3 / 4 occupants. That will be 20,000 more population at least. It's misleading and unacceptable to use a figure of 70,000 Southall population from back in 2014. I will examine the data and make further submissions as to the data concerning housing , new builds , number of units , planning application etc. prepared by Ealing Matters.²

To be fair , transparent , and make it easy for Southall people to understand Ealing Council should / must provide full details of exactly how many new homes are built on each development site identified here and also give honest straight information about exactly how many social rent units and London Affordable Rent units are being built in each tower block. That is what Ealing need feedback on. Instead people like me / us are spending days and weeks trying to get our head round the LP. The only reason I can write straight from my head (whilst on vacation with a disability affecting my fingers / digits and typing) is because I spent the whole summer 2022 reading planning and development management policies and documents , 2014 OAPF , NPPF, 2012 LP , SPDs , DPD, Statement of Community Involvement (SCI), how financial viability is calculated by developers, reading cabinet papers , economic reports, Race inequality and CPAG poverty of children in Ealing so that I could engage properly in the CPO 2021 The Green Southall UB2 4BQ. It took a long time for a well educated person to reach this level. A year!

Ealing Council , you may have satisfied the 6 week statutory consultation period or the extra 4 weeks taking us to today 8 February , but you have failed utterly in treating the people in this borough fairly. And in relation to Southall the inequality of our position in the borough and how badly we are treated has never been so stark.

If possible (and anything is politically possible), please consider all the surveys (more than 3000) and emails and letters (more than 700) as the initial form of gathering views which can inform a new Draft LP and which can then help with a New Draft LP that can go to formal Regulation 18 consultation. I am still concerned that the Summary Booklets in all the various languages was only ever a paper exercise. There is no real tangible evidence of engagement.

SO12 – Havelock Estate – Residential , mixed use scheme , re-provision / re-allocation of Bixley Field allotments, canal park area and green space, POS, community open space , Blue Ribbon Network etc . Time framework > 5 years

Comment :

I am running out of time and must submit this Draft Letter of Representations . I have not had sufficient time to start reading Spatial Strategy report , Tall Buildings, study all the green areas Ealing is about to relegate to a lesser protection throughout the borough etc. I came across the draft submission by CPRE (London Countryside) 26/01/23 (see attached). Southall people are also concerned about their environment, wildlife , nature , biodiversity and the air they breath. Removing our green spaces or reducing Green Belt land to MOL is unacceptable. I need to study this area better before making a cogent argument. Be it known that people throughout the borough are unhappy about losing anymore space (certainly green space) to concrete and high intensification developments/ towers.

There are Allotments that must be protected in Southall. There is the Allotments at Brindley Place just off Dormers Wells Lane which must be protected and Not reduced. Allotments serve also for biodiversity and cannot be disturbed. Their survival is too precarious. Once disturbed the wild life / insects etc are at worst likely to perish and at best unlikely to return .It is green space for us and in the long term will help to protect our urban living. Southall objects strongly to the loss of any green space, GB , MOL, Nature Reserve , Canal Conservation area , Community Open Space , Blue Ribbon Network etc.

SO13 – The Green – generally residential - generally 12 storeys allowed, mixed use commercial community space, reduced car park space. **Time framework < 5 years** 50% now 50% later .

Comment

However, previous building time provided was 2 years for project & permission given for 19 storeys in

7 blocks ?600 units. Ownership of land is mixed private (subject to CPO) and Council. My letter dated

28/09/22 focuses on this development in the context of Council's CPO and Public Inquiry in October 2022 whose Decision is still awaited. Many issues raised also concern surrounding developments to which Southall is objecting strongly but Ealing Council is Not listening or helping to make provision to enable the Southall people to have a voice. The banner under which equality / inequality of how Southall is being treated by Ealing Council is a farce and making fools of people with free bikes and lap tops at tax payers expense without consultation and inquiry of social needs of Southall, rather than being manipulated politically.

SO14 – The Green Quarter (Southall Gas Works site) - generally 18 storeys allowed residential with employment, uses , school , health centre , MOL ? health and community. Nature area? MOL ? The proposed cinema has now been omitted ! **Time framework > 5 years** .

Comment

Phases delayed due to contaminated land issues? Pollution ? toxic fumes? This development provides for 3750 new homes Construction will impact on clean air and Minet Park. Ealing and Berkley Homes have Not released any information as to why the next Phase of development has been delayed. Possible reason may be that the level of contamination in the Gas Works land is too severe to safely contain. Berkley Homes are not opening the road leading off to the right to the Green Quarter. Why not relieve the traffic congestion? If the time framework is more than 5 years , does that mean the road will not open again until construction starts again? There must be transparency so people can consider things and give feed back on the rate of development and whether or not it can be tolerated.

With reference to green spaces in this development , please refer to the Comment above Havelock SO12. Once disturbed the wild life / insects etc are at worst likely to perish and at best unlikely to return. It is green space for us and in the long term will help to protect our urban living. Southall objects strongly to the loss of any green space, GB , MOL, Nature Reserve , Canal Conservation area , Community Open Space , Blue Ribbon Network etc.

SO15 – Scotts Rd. Trading Estate - generally residential. Industrial site. **Time framework > 5 years**

Comment

Likely contaminated land , landfills polluted land needs investigation. This paragraph is incomplete. I need time to read the economic reports and evidence that informs this.

SO16 – Endsleigh Industrial Estate- generally residential, mixed use scheme and some industrial use Industrial site. There is nature conservation nearby , MOL ? and canal conservation , Blue Ribbon Network. **Time framework > 5 years**

Comment

Likely contaminated land , landfills polluted land needs investigation. This paragraph is incomplete. I need time to read the economic reports and evidence that informs this.

With reference to green spaces in this development , please refer to the Comment above Havelock SO12. Once disturbed the wild life / insects etc are at worst likely to perish and at best unlikely to return. It is green space for us and in the long term will help to protect our urban living. Southall objects strongly to the loss of any green space, GB , MOL, Nature Reserve , Canal Conservation area , Community Open Space , Blue Ribbon Network etc.

SO17 – Witley Works - generally residential, mixed use scheme and some industrial use Industrial site. There is nature conservation nearby ,Green Conservation Area , MOL ? and canal conservation , Blue Ribbon Network. **Time framework > 5 years**

Comment

Likely contaminated land , landfills polluted land needs investigation. This paragraph is incomplete. I need time to read the economic reports and evidence that informs this.

With reference to green spaces in this development , please refer to the Comment above Havelock SO12. Once disturbed the wild life / insects etc are at worst likely to perish and at best unlikely to return. It is green space for us and in the long term will help to protect our urban living. Southall objects strongly to the loss of any green space, GB , MOL, Nature Reserve , Canal Conservation area , Community Open Space , Blue Ribbon Network etc.

In the documents, I read a comment that developers are expected to seek to build on open land. This is likely to be that Southall's industrial history is such that what bits of open land lie are likely to be contaminated and too expensive to clean as well as give S.106 money to compensate. For that reason any green space is now at risk. Some may call it land grab! But, the truth is Ealing is laying down plans for our open green spaces to be included in development sites in the future to make it attractive for developers. Is that a fair point Ealing ? Southall objects strongly to these tactics.

SO18 – Monorep Site Poplar Ave. UB2 4PN – residential and develop new place of worship on the old car showroom site. There is nature conservation nearby ,Green Conservation Area , MOL ? and canal conservation. **Time framework > 5 years**

Comment

With reference to green spaces in this development , please refer to the Comment above Havelock SO12. Once disturbed the wild life / insects etc are at worst likely to perish and at best unlikely to return. It is green space for us and in the long term will help to protect our urban living. Southall objects strongly to the loss of any green space, GB , MOL, Nature Reserve , Canal Conservation area , Community Open Space , Blue Ribbon Network etc.

SO19 – Warren Farm UB2 4NE – Decided by Council to designate for sports (Foot ball pitch to be sold to Southall FC) and Nature Reserve

MOL , Canal Conservation, Nature Conservation, Community Open Space.

Time framework > 5 years

Comment

With reference to green spaces in this development , please refer to the Comment above Havelock SO12. Once disturbed the wild life / insects etc are at worst likely to perish and at best unlikely to return. It is green space for us and in the long term will help to protect our urban living. Southall objects strongly to the loss of any green space, GB , MOL, Nature Reserve , Canal Conservation area , Community Open Space , Blue Ribbon Network etc. This area has never been built on. It's always been Southall's bit of countryside. It has now re-wilded itself. Our environment is at a huge risk with all its biodiversity. Before Ealing interfere with this nature area , why can you not consider adapting the street lighting throughout the borough to lessen the all night glare disturbing insect a life and biodiversity. This is not just about climate change. It's about our very existence. Carbon footprint , pollution , disturbing our limited green spaces is unacceptable. Southall will object. And especially since this has all been engineered by certain political figures seeking to influence major decisions that affect the lives of our children and future generations and all for their own profit. And to guarantee future political influence and gains. Southall people will object.

This proposal has come despite petitions of thousands of people supporting the Warren Farm as a re-wilded nature area. Ealing Council has no mandate for this proposed designation.

There was never any demand from Southall people to sell the land to Southall FC. Or make this land vulnerable to developments in the future. Ealing has now laid the first stage to open the way. No consideration has been given to:

- Suitability of land for a football club which will attract more traffic , cars on Windmill Lane that already is at full capacity.
- Narrow single lane of the road
- The disturbance to residents and around the area
- This is the main route to the large Tesco , Home Base , Great West Road , towards Brentford , Kew , Kingston , Richmond etc.
- No bus routes here
- Heritage site of Three Bridges

List is incomplete. This proposal needs time for careful appraisal. Insufficient time

Further Ealing is also proposing to de- designate other GB land in the borough and reduce to MOL. These proposals must be examined more carefully.

SO20 – Great Western Triangle Centre UB1 3EJ- Mixed industrial intensification. Importance for Nature Conservation priority habitat A Masterplan will be required (Development Management Policies). **Time framework > 5 years**

SO21 – Hanson’s Timber Yard & Motec- Residential , employment and community open space .
MOL ,

Nature Conservation, priority habitat, TPO . **Time framework > 5 years**

Comment SO20 & SO21

Check possibly historical contaminated land.

With reference to green spaces in this development , please refer to the Comment above Havelock SO12. Once disturbed the wild life / insects etc are at worst likely to perish and at best unlikely to return. It is green space for us and in the long term will help to protect our urban living. Southall objects strongly to the loss of any green space, GB , MOL, Nature Reserve , Canal Conservation area , Community Open Space , Blue Ribbon Network etc.

SO22 – Car Sales, Queenstyle & MBS – Residential led , mixed use scheme. Importance for Nature Conservation, Green Corridor , TPO. **Time framework > 5 years**

Comment

Check possibly historical contaminated land.

With reference to green spaces in this development , please refer to the Comment above Havelock SO12. Once disturbed the wild life / insects etc are at worst likely to perish and at best unlikely to return. It is green space for us and in the long term will help to protect our urban living. Southall objects strongly to the loss of any green space, GB , MOL, Nature Reserve , Canal Conservation area , Community Open Space , Blue Ribbon Network etc.

SO23 – Golf Links Estate – Residential infill. Nature Conservation. **Time framework > 5 years**

Comment

With reference to green spaces in this development , please refer to the Comment above Havelock SO12. Once disturbed the wild life / insects etc are at worst likely to perish and at best unlikely to return. It is green space for us and in the long term will help to protect our urban living. Southall objects strongly to the loss of any green space, GB , MOL, Nature Reserve , Canal Conservation area , Community Open Space , Blue Ribbon Network etc.

Why can't Ealing Council progress things faster at Golf Links estate? Sherrington Court is in a terrible state of damp issues throughout. St Davids and Portrush Court are both derelict on Flemmig Road. Must people wait for more than 5 years before these buildings are dealt with. These things are impacting on public realm issues.

SO24 – Cranleigh Gdns. Industrial Estate & Kingsbridge Cres. Residential , Community .Metropolitan Importance for Nature and Nature Conservation. **Time framework > 5 years**

Comment

Check possibly historical contaminated land.

With reference to green spaces in this development , please refer to the Comment above Havelock SO12. Once disturbed the wild life / insects etc are at worst likely to perish and at best unlikely to return. It is green space for us and in the long term will help to protect our urban living. Southall objects strongly to the loss of any green space, GB , MOL, Nature Reserve , Canal Conservation area , Community Open Space , Blue Ribbon Network etc.

S025 –Southall TA Barracks – Residential –led , mixed- use scheme incl. some employment uses. Metropolitan Importance for Nature and Nature Conservation. Also Canal.

Time framework > 5 years

Comment

With reference to green spaces in this development , please refer to the Comment above Havelock SO12. Once disturbed the wild life / insects etc are at worst likely to perish and at best unlikely to return. It is green space for us and in the long term will help to protect our urban living. Southall objects strongly to the loss of any green space, GB , MOL, Nature Reserve , Canal Conservation area , Community Open Space , Blue Ribbon Network etc.

SO26 – Hamborough Tavern – Residential –led , mixed- use scheme. Canalside Conservation Area. Also Canal. **Time framework > 5 years**

Comment

With reference to green spaces in this development , please refer to the Comment above Havelock SO12. Once disturbed the wild life / insects etc are at worst likely to perish and at best unlikely to return. It is green space for us and in the long term will help to protect our urban living. Southall objects strongly to the loss of any green space, GB , MOL, Nature Reserve , Canal Conservation area , Community Open Space, Blue Ribbon Network etc.

There are several documents that have yet to be read. Considering modes of travel and knowing that all the bus routes and buses are busy , 20 minute cities / towns, I have explained that Southall walks and buses it. I began to look on Google for buses in our area. I've come across the TFL Southall Development Sites – Bus Study May 2021. ⁵ It states : “This review examines the bus network in and around Southall and how it may change in the future both in response to changing travel patterns and the large scale developments being built in the area.”

TFL were working on the data pre-covid and so published in May 2021. TFL required the review to meet London Mayor's policy for change in mode of travel and sustainability. It makes for interesting reading. This is the information needed to give feedback. There should have been a consultation on bus routes in summer 2022 and by now there should have been a report on adding some new bus routes. The review came about in response to considering increased development and movement of people in Southall. Southall is not averse to using alternative transport. Indeed Southall people bus it or walk. They don't cycle.

I reserve my right to make more detailed representation in due course. The main purpose here is to give an outline and sufficient notice about the matters which cause Southall people concern. But at the same time we need time to consider other areas of the borough and the plans made by Ealing Council. Majority of us spend a huge amount of our daily lives within the 20 mile radius of London Borough of Ealing. We need to consider other areas that we frequent and give feedback.

I have just seen a Youtube video of the Council's planning committee holding a special meeting to hear from organisations and representatives. Ealing residents are well organised. There are also people with some planning background. There was no one representing Acton. Rev. Mark Poulson made representations for the faith organisations in Southall. The ordinary residents of Southall were not represented. Southall has a large population of 80,000. It is a large town and has 6 wards. It holds 22% of the borough's population. Ealing, West Ealing, South Ealing etc is the largest area in the Local Plan and has some 37 sites designated for development. Southall is impacted seriously with 26 Development Sites. Southall has high poverty indicators and digital exclusion being the main cause of low level engagement in local governance processes. Southall was the last to have a Walkabout and Workshop. Attendance by ordinary Southall folk was very low. Southall suffers inequalities at every level. The many Summary Booklets printed in different languages was only a paper exercise by Ealing Council. I checked the Southall library and there were no Booklets in different languages. There was No door to door letter drop notifying people of this major consultation.

I am genuinely concerned notification procedures are flawed and inadequate. Strictly speaking there should have been detailed consultations that would then inform the draft LP, which would then be subjected to Reg.18 consultation. The planning inspector will be asked to consider whether this purported Reg.18 consultation is properly conducted and lawful. To meet the dead line I have prepared urgent Representations on behalf of Southall people. I am confident that many of my friends and contacts agree with the matters I have stated trying to give feedback as a matter of urgency.

Yours faithfully

Life time Southall resident and 25 years business owner in Southall Green

Attachments:

1. Summary type of index dated 17 October 2022 attached to Letter of Representations 28/09/22 (Summary will be forwarded 18/02/23 on return from vacation as stated on p.8 above)
2. Ealing Matters – Ealing Local Plan Consultation. Analysis of Development Sites Allocation 05/02/23
3. Draft Letter from CPRE - The Countryside Charity (London) "Response to Local Plan Regulation 18 Consultation" 26/01/23 (paras. 48 & 53 pp. 17 & 18)
4. Maypole Development Margarine Factory - News Article Ealing Today 05/01/23 [Ealing's Local Web site \(ealingtoday.co.uk\)](http://Ealing's Local Web site (ealingtoday.co.uk))
5. Southall Development Sites – Bus Study May 2021

I have prepared representations and I will have tried to email as many local contacts as I can. I have also requested the to at least write their own email and give their feedback.

Possible residents consulting in a group to be co-ordinated / picked up within the next 2 weeks .

J. Bingham, H. Casey, A. Gondal, H. Randhawa, G. Lafford, S. Garcha, S. Grewal, J. Soni, K. Plant, Sukhbinder Sidhu, R. Bajwa, Shera Bains, S. Bains, S. S. Rai, O. P. Dogra, P. S. Takhar, Mr & Mrs Kular, Mr Haralambous Georgiou, S. Mannel, S. Pandher, J. S. Sagoo, B. Grewal, R. Singh, Walia, Kuldip Kaur, M. Roopraj, K. Anand, T. Vasileva, S. Hendry, S. Basra, S. Ratu, A. Keeley, Rita, R. Birk, G. Kalsi, R. Wilkhu, Gina, P. Paul, T. Dogra, P. Jatana, R. Pandher, B. Purewal, L. Porter, R. Singh, K. Takhar, S. Hendrey, A. Bahho, G. Kalsi, Kamalpreet, Helen Sahib,

Any such persons who have joined this letter do so as members of the community to join in the Reg.18 consultation process relating to the Draft Local Plan 2023 which will also be considered by the Planning Inspectorate in due course. These are not intended to be legal representations and are

simply the result of community efforts of individuals trying to address the numerous issues arising asking the writer to add their name in support of the concerns she has raised relating to the Draft Local Plan 2023 for Ealing Borough which will guide the development in the borough over the next 15 years and the changes envisaged by the Council will : “... touch almost every aspect of everyday life”. We are bringing to the Reg. 18 consultation process various initial concerns and requested to extend the time for Regulation 18 consultation to 31st March 2023 . We The people of Southall (all individuals) and shopkeepers who are affected by Ealing Council’s draft Local Plan are free to engage in making their own personal representations and responses to the Council’s on line draft Local Plan and interactive questions and join any group they are able to form to discuss things at any time.

