

Part B – Please use a separate sheet for each representation 1

Name or Organisation: XXXXXXXXXX

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	DAA Design and Amenity – Ealing LPA	Policies Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/> NO
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/> No
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/> No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Note that this representation concerns the need for the plan to work with communities to understand local aspirations and to reflect them better to achieve well-designed and beautiful places

The National Planning Policy Framework Chapter 12 establishes that ‘creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this.’

NPPF Para 132 states ‘Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.’

London Plan Policy D1A: London’s form, character and capacity for growth (Defining an area’s character to understand its capacity for growth) *requires that ‘Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area to*

develop an understanding of different areas' capacity for growth. Area assessments should cover (12 listed) elements'.

Policy DAA in the Regulation 19 Plan does not respond either to the NPPF's or the London Plan's requirements. It is therefore inconsistent with national policy and therefore unsound. The Policy has not been developed with local communities; in particular all the different communities in Southall Town, does not respond to local aspirations and shows no understanding of Southall's defining characteristics. While some useful studies of the Borough and Southall appear in the evidence base – those by Allies and Morrison look very interesting – they have not been drawn together in any coherent way eg through the preparation of design codes, the public has been given no opportunity to comment on them and it is hard to discern their findings reflected anyway in the Plan Policy.

Instead, the text that supports Policy DAA is unacceptably vague – so much so that it sets no design expectations to guide developers in the Borough.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. Public engagement based on the work by Allies and Morrison is required to establish the Borough's design expectations as NPPF Chapter 12 and London Plan Policy D1 require.
2. Policy DAA needs to be reworded and expanded to respond to these higher level policies. Policy D1 Design in the London Borough of Camden's plan provides a good template:

'The Council will seek to secure high quality design in development. The Council will require that development:

- a. respects local context and character;*
- b. preserves or enhances the historic environment and heritage assets;*
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
- d. is of sustainable and durable construction and adaptable to different activities and land uses;*
- e. comprises details and materials that are of high quality and complement the local character;*
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
- g. is inclusive and accessible for all;*
- h. promotes health;*
- i. is secure and designed to minimise crime and antisocial behaviour;*
- j. responds to natural features and preserves gardens and other open space;*

- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
- l. incorporates outdoor amenity space;
- m. preserves strategic and local views;
- n. for housing, provides a high standard of accommodation; and
- o. carefully integrates building services equipment.

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.'

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Design in the Borough has taken something of a back seat in the past 10 years. For Southall Town there was the Opportunity Area Planning Framework 2014 (OAPF). I would like to make the case for how Design matters set out in OAPF were ultimately Not followed and going forward this must Not be repeated in the New Local Plan which seeks to supersede a good planning framework where design information was set out.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Part B – Please use a separate sheet for each representation 2

Name or Organisation: XXXXXXXXXX

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	Policy ENA: Enabling Development – Ealing LPA – local policy	Policies Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes			No	No
4.(2) Sound	Yes			No	
4 (3) Complies with the Duty to co-operate	Yes			No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Proposed Policy ENA lacks reasoned justification, and therefore does not comply with section 8(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is therefore not legally compliant and unsound.

Historic England summarises enabling development as *‘development that would not be in compliance with local and/or national planning policies, and not normally be given planning permission, except for the fact that it would secure the future conservation of a heritage asset.’* The NPPF uses the term only in connection with conserving the historic environment, saying that *‘Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.’*

Application of the concept of enabling development to permit development on MOL sites thus appears a novel idea. Its use to develop Metropolitan Open Land in general would depart considerably from the principles that apply in the context of protecting historic assets. Enabling development policies do not appear to feature in the NPPG or and in the NPPF’s terminology they seem to constitute neither a strategic policy (para 20ff), nor a non-strategic one (para 28ff).

MOL falls under the aegis of the London Plan which safeguards it to the same extent as the Green Belt which means that inappropriate development on it is only permissible in ‘very exceptional circumstances’. If it is endorsed, the policy would remove this higher level protection and allow the Council to

override London Plan policies and grant itself planning permission for developments not otherwise acceptable. This risks unacceptably politicising the planning system. It would be particularly unfortunate in a Borough like Ealing whose very strong single party administration allows, in practice, for little oversight or scrutiny.

(Continue on a separate sheet /expand box if necessary)

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The policy should be deleted.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

There is a very important point of principle at stake here that needs to be addressed.

Southall has very little open green space and public open spaces as evidenced in AMRs going back to 2014. Brown fields are left behind by historical industrial works and are chosen for development, but that often involves greater expense for decontaminating land processes. Green land is much sought for development. This policy is a political step in itself. This policy needs to be deleted as it will have repercussions for Southall in the long term and in the next onslaught of development sites 15 years whence.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Part B – Please use a separate sheet for each representation 3

Name or Organisation: XXXXXXXXXX

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	Policy D9 Tall Buildings – London Plan – Ealing Southall Local variation	Policies Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>		No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>		No	<input type="checkbox" value="No"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>		No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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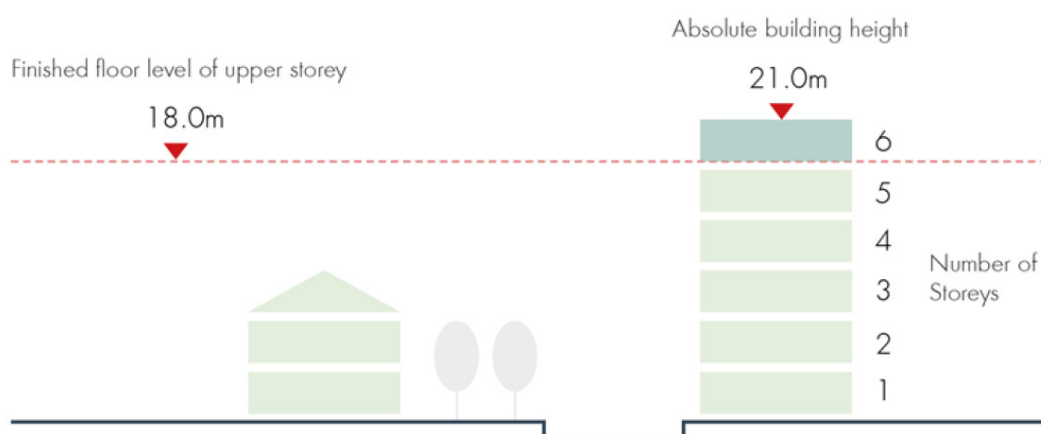
I support the submissions made by XXXXXXXXXX Save Ealing Centre copied below:

We have four concerns – which we call matters - with this policy. These arise from the fact that Policy D9 is not clearly written (or otherwise presented) and unambiguous which means it fails to meet the test in NPPF Para 16.(d) and is therefore unsound. Matter 4, in addition, is not justified as it is not based on proportionate evidence.

Table DMP1 of the plan provides thresholds for what the Borough considers to be tall buildings across 59 different zones in the Borough. The thresholds range from 6 storeys in many parts of the Borough to 21 storeys in Ealing Town Centre. The justificatory text (para 5.14) explains that the policy ‘builds upon comprehensive evidence developed in line with the London Plan’. Although this is not specified, this evidence is understood to relate to a series of reports by Allies and Morrison which culminated in a final report dated December 2023, posted in the evidence base on the New Plan website with all the other Regulation 19 documents. It is worth noting that the Allies and Morrison reports appear to be the only evidence speaking to this part of the Plan.

1. Figure DMP1 on page 45 of Chapter 5 of the plan is of such small a scale that it is unclear in which area some streets lie. This matters because there are significant differences in the thresholds for tall building in some adjoining areas. In its present form, the Policy D9F says that ‘tall buildings above defined thresholds are exceptional and should be located upon specified Development Sites defined in the Development Plan’. There is no definition in the policy of the word ‘exceptional’ as it is applied here, but Roget offers synonyms such as ‘rare’, ‘uncommon’ or ‘unprecedented’. This is not how the policy is being applied in Acton where 50% of development sites are identified as being suitable for tall buildings, or Ealing 60% (94% in the Metropolitan Town Centre) or Southall (40%).
2. When read in conjunction with Policy D9, Table DMP1 appears to show that 6 storeys buildings across the Borough are never considered to be tall, but that in many places 7 storey buildings would be. This would constitute a misreading of what Allies and Morrison say.

Table DMP1 is based on the Table on pages 9-11 of the Allies and Morrison February 2024 Tall Buildings Strategy which carries a footnote indicating that the definition of ‘tall’ in most neighbourhoods is the same as the London Plan minimum which is that tall buildings may not be less than 6 storeys. Allies and Morrison helpfully illustrate what this means in this diagram on page 5 of their report:



Clearly Allies and Morrison envisaged that in most parts of the Borough 6 storeys would constitute a tall building. Policy D9 needs to be clear about this.

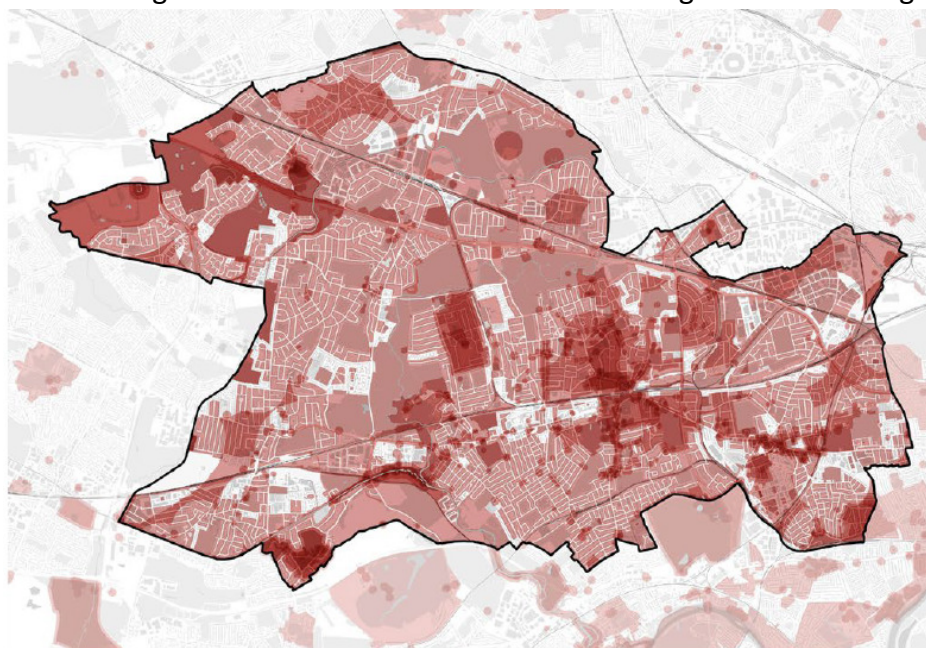
3. Details in Table DMP1 of policy D9 depart significantly and with no justification from the tables in the Allies and Morrison report on which the policy is understood to be based. While in most parts of the Borough the thresholds are the same in both documents, in three areas they differ greatly and for no apparent reason. These three areas are identified on the table below:

Neighbourhood	Map Area	Allies & Morrison Tall Building Strategy		Policy D9 Table DMP1:
		Prevailing height (storeys)	Proposed Tall Building Threshold (storeys)	
West Acton	A2	2.3	6	14
Horn Lane	A4	2.9	6	14
Ealing Town Centre	E14	4.4	9	21

Allies and Morrison’s strategy report explains the methodology for their classification. This is based on the prevailing heights in each sub area as well as on considerations of sensitivity (especially heritage), suitability and appropriate locations. Page 9 of their report says the prevailing heights of the two areas in Acton are 2.3 storeys and 2.9 storeys respectively while in Ealing Town Centre it is 4.4 storeys.

Ealing Town Centre, (in which there is just one 21 storey building) is also notable for being largely protected by several conservation areas.

Allies and Morrissons summarise their findings in this map on page 15 of their 2022 tall buildings strategy. The map shows Ealing Town centre and the two areas in Acton to be amongst the most sensitive areas in the Borough for tall buildings.



Composite heat map indicating areas which are potentially sensitive for tall buildings, with the darkest areas considered most sensitive.


Disappointingly, neither the Plan itself or any of the background papers supporting it discuss Allies and Morrison’s findings or their implications.

Allies and Morrison’s detailed and extremely well researched findings of Volume 2 of their January 2022 Characterisation Studies corroborates these conclusions more fully. They conclude that the ‘Scale of intensification’ for Ealing Town Centre comes under the category of ‘Repair’, a view that arises from its findings that:


- ‘As the historic core of the borough, Ealing has magnificent buildings including Grade I Pitzhanger Manor at Walpole Park. ... Much of the area is covered by conservation areas, though **Ealing town centre CA is considered heritage at risk**’.

- There is an ‘Opportunity to sensitively increase density in Ealing town centre to take advantage of Crossrail, while being mindful of its heritage at risk status.
- There is a ‘potential to intensify along the Uxbridge Road in general, with mansion block/flatted development.
- Under its ‘character based growth themes’ there are ‘opportunities for mid-rise intensification’, around Ealing Town’s 9 stations to make ‘use of good access to transport links and the services found here’.
(our emphases)

The plan’s identification of Ealing Town Centre as a location where tall buildings would be deemed to be buildings higher than 21 storeys is not just unjustified, other policies in the plan do not even support it. Policy D9 appears to suggest that in Ealing Town Centre no building of less than 21 storeys – one of 20 storeys perhaps - would be deemed tall. This does not sit with proposals for particular development sites in the town centre which are apparently suitable for tall buildings but with a maximum height much lower than 21 storeys. We are told for example that site O2EA should have a maximum height of 12 storeys.

.....


I do not have the experience, skills, expertise or time to learn how I can address or express my concerns about Tall buildings in Southall I specifically. I am unable to do it academically or technically to feel confident I am making a proper or valid judgement. In this respect I would request the planning Inspectorate officer to appreciate what criticisms I wish to make and consider for itself to what extent those criticisms are valid when considering policy D9.

The points that have been made skilfully by  above , I would request that where appropriate they are applied to the matters I have stated below:

The Southall Opportunity Area Planning Framework was in a draft form for some time and believed to have been finally given approval in 2013/2014. The maximum height for the buildings were clearly indicated to be between six and eight storeys high with the exception that blocks would be at a greater height along the railway lines. The tower blocks which have resulted in the last few years are horrendous in Southall people view.

Even ordinary people who cannot afford their own homes (renters) are shocked by what is happening in Southall. They are full of dismay. People sit on the Elizabeth line and after going through Hanwell and the Wharncliff Viaduct, looking out the window they gape at the sudden emergence of towers and tall buildings. It’s a shocking site already and was worse to come if the new local plan provisions are approved without any amendment.

The Council concentrate on the high level of poverty indicators in Southall and use it as a justification for bringing in more housing developments for the “poor people” of Southall. The irony is that the housing developments are truly unaffordable by the very people who are hoping to buy a flat. A new build two-bedroom flat is selling at £450,000 and not only are they unaffordable, but also unsuitable for the needs of people living as families and extended families.

Culturally, in Southall our different ethnic communities live in larger families and aspire to owning a home with a garden for their children. They don't look at the high-rise flats in the hope that they may one day live there. When they rent, they look for lowrise blocks with some green space around them close to schools and community neighbourhood feeling. The Council's Report by Allies Morrison supported this when making a presentation at the Council meeting earlier this year.

The council concerns itself with the high poverty factors facing Southall people and how to tackle inequality. It considers how it can address the high level of unplanned deaths in Southall, indicating the poor level of health and mental health. The council hands out bicycles to get people moving, when culturally they are moving round as families pushing prams, with children, carrying shopping in long traditional dress. Council say they are trying to deal with inequalities, but by forcing a culture change of whizzing around on bicycles are they not imposing their own qualities of how they perceive people should move around the town? In any case please consider:

1. Can Tall buildings / towers alleviate the housing crisis faced by people as well as the high cost of living and rents?
2. Can tall buildings alleviate all the underlying causes of inequality faced by the largely ethnically different immigrant communities here in Southall?
3. Tall buildings help with the digital exclusion faced by many of the communities here in Southall who are unable to engage in basic democratic local government processes.
4. Can tall buildings help to alleviate the crisis of population density in Southall?
5. Can tall buildings alleviate the issues surrounding mobility and transport in an area where the population is increasing thick and fast because of new developments?
6. Can tall buildings alleviate the poor health conditions and the need for more social infrastructure, medical services, schools, leisure services etc ?
7. Can Tall buildings reduce carbon footprint?
8. Can Tall buildings reduce pollution from contaminated land/brownfield disturbance / development?
9. Can tall buildings create more new employment ?
10. Can tall buildings help the different ethnic communities to live more harmoniously?
11. Can tall buildings introduce or encourage a night-time economy? Cinema?
12. Can tall buildings increase green space or public open space to

accommodate the added space needed for every thousand persons added to our local population which is in excess of 80,000 (in 2021) and now more likely in the region of 90,000.

13. Can tall buildings help biodiversity, insect population, wildlife, wild birds etc?

For the past 20 years there has been no space in this densely low build environment of Southall that could accommodate reasonably decent housing developments or if they were they needed to be done very carefully. This was confirmed in the very first report commissioned by the council in 2012 with the company GVA Grimley 2012. I referred to this report in my representations (letter dated 28/09/2022) re-the compulsory purchase order hearing in October 2022. There has been an onslaught of developments in Southall since coming out of Covid 2021 and because there was lack of space on the ground, the only way was to build up in to the sky space. Even now the Elizabeth line is always full. The platforms are full. The buses are always full. Buses run almost every two minutes because the public are using them. There is not enough space to walk on the pavements. We easily and often step of the curb and walk in the gutter. The main shopping street are overcrowded. The people of Southall are all aware of the level of overcrowding and dense population.

The people of Southall cannot comprehend what kind of justification has been made for tower blocks / Tall buildings to be placed just behind a traditional high street (The Green) and towering over traditional Victorian terraced housing. The towers being built on Park Avenue presently and at the back of Southall Park / Red Lion can be seen sitting (on the lower deck) in the 207 bus coming along Uxbridge Road just after the Iron Bridge. Southall has its own character. The trouble is, did the Council ever care to protect its character and heritage as an old Victorian town in the first place. Even now no respect was shown for the Manor House grounds on The Green when allowing the planning permission for seven blocks just behind small high street, so that the blocks could aggressively tower over the war memorial and the Tudor Manor House. The tall buildings and towers are causing harm to Southall Town and her different communities. Visitors are already remarking just how ugly it has become.

Under Reg. 19 local plan the proposed number of high-rise building sites in Southall are:

Crossrail Station around South Road bridge, Merrick Road etc. – 18

Southall Sidings – 6

Former Post Office sorting office site – 6

The Limes, Maypole Ct. & top of The Green – 18

Middlesex Business Centre site – 16

Havelock Estate – 8

The Green (Dominion/Featherstone Terrace car park)- 18

Green Quarter (old gasworks site) – 18

Tall buildings and high-rise blocks at this kind of level are generally expected under Policy D9 to be the exception and not the norm. The OAPF 2014 envisaged and planned for heights not exceeding six – eight storeys . About 46% of Southall's many developments involve tall buildings. How was this ever justified under the regulation 19 local plan? Why has it suddenly become common and how was it justified to mark

The council was always aware of the requirements aims and statements of

Southall OAPF 2014 . The council has been aware of objections made to the tower blocks and tall building D9 policy. The council were heavily involved in The Green (Dominion/Featherstone Terrace car park) compulsory purchase plan from around 2015. During all the time they engaged shopkeepers and business owners they never informed them of their plans to develop with tall buildings.

Whilst the council dealt with compulsory purchase negotiations and in particular Tudor Rose on The Green (around 2020) they knew from their involvement with community members that people were unhappy about the development intended by Peabody. In 2021 further objections were made by significant members of the community about the level of overdevelopment, high-rise and tall buildings being proposed for flats. Did the council take those objections forward or take on board the various concerns made known to the council which was before they started the Shaping Ealing survey. The council take those objections forward to the Reg 18 draft local plan?

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

 Modifications

Modification 1:

To resolve Matter 1, the boundaries of tall building threshold areas need to be depicted at a proper scale on the Interactive Policies Map.

Modification 2:

To resolve Matter 2, site appraisals need to be much more carefully done. Where, in 'exceptional circumstances', a site is deemed appropriate for a tall building a proper justification is required.

Modification 3:

To resolve Matter 3, and to avoid any dangers of it being misinterpreted, Policy D9F should be amended to read 'tall buildings ***of, or*** above defined thresholds are exceptional and should be located upon specified Development Sites defined in the Development Plan'.

Modification 4:

To resolve Matter 4, Table DMP1 needs to be replaced with the Tables from pages 9 to 11 of the December 2023 Allies and Morrison Tall Building strategy.

.....

There is nothing wrong with the Southall OAPF 2014. What was envisaged then was agreed after a lot of negotiation and consideration by the council and Boris Johnson Mayor of London. The framework was sympathetic to the way Southall town managed itself as a vibrant place and successful micro economy. The OAPF 2014 should now be carefully considered, reviewed properly and not be allowed so easily to be superseded by the Reg 19 new Local Plan.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

 Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

comment.

I think it is important to press the need for planning to comply with Government legislation. Whether it does so or not should not be optional.

I think it is important that when a detailed planning framework has been agreed such as the Southall Opportunity Area Planning Framework 2014 it should be followed as far as possible, taking account of the level of consultation, council officer involvement and community involvement that had already taken place when feeding into that framework. Otherwise, what is the point of engaging in these planning processes, public consultations and playing our part as a residents so that we can make our towns and spaces lovely happy places to live. At the very least the OAPF must be reviewed now and more specifically consulted upon going forward there a decent workable planning framework for Southall town.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Part B – Please use a separate sheet for each representation 4

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	Paragraph: A1.1 to A1.9 and Table 1	Policy	Appendix 1: Monitoring Framework	Policies Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

LBE has persistently failed to comply with national planning policy with regard to the review and monitoring of its current Local Plan.

- The NPPF December 2023 (para 33) states that:

Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly;

There has been no published review of the current Plan since its adoption in 2012 even though LBE's annualised housing targets increased massively over the last 12 years (from 890 to 1,297 in 2015-16 and then to 2,157 in 2019-20).

- The Planning and Compulsory Purchase Act 2004 Provision 35 states at point 2.(2)(b):

Every local planning authority must prepare reports containing such information as is prescribed as to –

- (a) the implementation of the local development scheme*
- (b) the extent to which policies set out in the local development documents are being achieved.*

And at point 3.(3):

A report under subsection (2) must –

(a) be in respect of a period –

- 1. (i) which the authority considers appropriate in the interests of transparency,*
- 2. (ii) which begins with the end of the period covered by the authority's most*

recent report under subsection (2,) and
3. (iii) which is not longer than 12 months or such shorter period as is prescribed;

- The most recent full Authorities Monitoring Report for LBE (published in 2015) dates back to 2013-14. Residents have been asking for updates since 2016 without success. (EM1)
- An interim AMR covering 2014-2019 was published in October 2021 only after a member of Ealing Matters made a formal complaint to the Local Government Ombudsman (LGO), but its content was incomplete. The LGO directed LBE to produce a final full AMR for 2019-20 by the end of 2021 (EM2). LBE did not do so, and the LGO failed to enforce its decision (EM3).
- LBE has still not produced its AMR for 2019-20, nor has it produced AMRs for any year since, frequently citing the move from the London Development Database to the London Datahub as a reason.
- An email dated 28 September 2022 from Peter Kemp, Head of Change and Delivery, Planning at the GLA states that ‘the Datahub is now fully operational for Ealing’ (EM4). Furthermore, this compares with neighbouring authorities such as LB Hammersmith & Fulham and LB Hounslow, both of which have published AMRs for 2019-20, 2020-21 and 2021-22, and LB Brent, which has further published an AMR for 2022-23.
- At a meeting with LBE in January this year, Ealing Matters pointed out that AMRs are crucial to aiding community understanding of the broader picture of planning in the borough, but the Head of the Strategic Directorate for Economy and Sustainability stated that the Local Plan had been prioritised over the AMRs (EM5).

The references in brackets refer to the following evidence, which can be provided on request:

EM1 Ealing Authority Monitoring Reports: Record of FOIs and other information requests

EM2 Local Government & Social Care Ombudsman decision notice re complaint no 21 000 857 against London Borough of Ealing (15 September 2021)

EM3 Email from F.DiNetimah (LGO) re Case ID – 21000857 to Kay Garmeson (24 January 2022)

EM4 Email from Peter Kemp, Head of Change and Delivery, Planning, Greater London Authority to Kay Garmeson (28 September 2022)

EM5 Minutes of a meeting between community groups and Ealing Council on 23 January 2024, Item 3b)

On the basis of this poor review and monitoring record, we wish to raise the following issues with regard to the proposed Monitoring Framework:

Issue 1:

It is a matter of great concern that the Monitoring Framework is an appendix to the new Local Plan and not a policy within it (in contrast to LBE’s Development Plan

Strategy 2012 in which it is Policy 1.2 (o) and to the Local Plans of other London boroughs, e.g. Camden, Wandsworth, and the London Plan).

Issue 2:

Paras A1.1 – A1.9 contain no indication of or commitment to the timing and frequency of publication of reviews and Authorities Monitoring Reports, despite these being clearly stipulated by the NPPF December 2023 para 33 and the

Planning and Compulsory Purchase Act 2004 provision 35 respectively. It should not be necessary for members of the public to go digging around in higher level policies in order to find this out.

Issue 3:

The Town and Country Planning (Local Planning) (England) Regulations 2012 Part 8, Provision 34 requires the production of Authorities' monitoring reports, but paras A1.6 and A1.8 in LBE's Monitoring Framework refer to an 'Authorities Monitoring Framework' followed by the acronym AMR (a change made since the Reg 18 consultation). This change in title is confusing to the public, who are a key target audience for these reports, and out of step with Provision 34.

Issue 4:

This relates to the indicator/performance measures contained in the Monitoring Framework.

With only 20 indicator/performance measures, all at a Borough-wide level, the scope of the Monitoring Framework itself (Table 1) is inadequate. (By contrast, LB Wandsworth's Monitoring Framework includes ca 200 measures.)

- The Borough-wide strategic policies SP1-4 have wide-ranging goals, but most of these are not reflected in relevant indicator/performance measures.
- While SP1: A Vision for Ealing B. promises to promote an inclusive economy by 'spreading the benefits of new growth more equally across the Borough's neighbourhoods', none of the indicator/performance measures capture the effects of policies set out in Chapter 4 separately for each of the seven towns.

The National Planning Policy Framework December 2023 requires in para 15 that plans should be 'succinct' and in para 16d) 'contain policies that are clearly written and unambiguous'. The Monitoring Framework fails to comply with these requirements in that the measures themselves are unclear:

- The reporting timeframes for each of the indicator/performance measures are not always provided
- The units of measurement are often imprecise, unintelligible or absent.
- The targets are not always sufficiently self-explanatory.

Issue 5:

LBE appears to draw a distinction between the 'Monitoring Framework' for internal use (see para A1.7) and the 'Authorities Monitoring Framework' to be reported (see para A1.8). Para A1.6 mentions 'new and additional measures' that 'may be identified over-time (sic), and these will be reported through the Authorities Monitoring Framework', but there is no indication of what these might be or when they might be scoped out.

.....

I fully support the matters stated by Ealing Matters . AMRs data is crucial to understanding the profile of each town in the borough and how they compare against each other. As a lay person I came across AMRs when I was dealing with the compulsory purchase public enquiry in summer 2022. The data was critical to my understanding of why such information is important when considering the viability of any planning aspect and to identify the needs of the different parts of the borough. I needed the up-to-date AMR with full data in August 2022.

Partaking in the Public Inquiry (October 2022) was my first experience of engaging in the subject of local government planning frameworks and compulsory purchase order procedures etc. I recall reading all the strategic and development documents, SPDs , SPG etc. OAPF just so that I could understand and play my part in civic duty to challenge the council's compulsory purchase order Re. The Green UB2 4BQ. As a local resident I was concerned that a major compulsory purchase order was in existence in relation to a major development on our community car park used by all the faith buildings in the immediate vicinity etc. I requested a public enquiry in public interest. I then had to start learning from all these various planning documents to enable proper consideration, appraisal with a view to drafting concerns and objections on behalf of Southall residents and some businesses.

The OAPF document Was accessible on the council's website as a document which was still valid and applicable. At some point in September 2022(when I was preparing for the public enquiry hearing) the council removed the OAPF from their website. It is still a valuable document and should still be available on the councils website and readily accessible by the planning inspector in relation to this matter.

I am only a layperson and have no real qualifications in this field. But it is evident that compliance in relation to planning frameworks, regulations, statutory documents etc. must be of the utmost importance. We are dealing with local government matters. These are things that impact our lives, present and future. There should be stricter procedures in place to support governance so that when any shortcomings are found it can be dealt with more swiftly and be subject to a formal monitoring procedure with the council's legal department is involved.
back

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Modification 1:

We recommend that there should be a specific policy dealing with review and monitoring in the main body of the Local Plan to reinforce their status as statutory requirements. This should set out what the local planning authority can be expected to produce to what time scales. In our opinion, LB Wandsworth's Policy is a good model and is reproduced below.

LP6 I Monitoring the Local Plan

- A. The Council will complete a review of the Local Plan policies and publish its conclusions at least every five years. Conclusions from the first review will be published no later than five years from the adoption date of the Plan.
- B. The Council will have particular regard to the following factors when reviewing policies within the Local Plan and determining whether or not relevant policies require updating:
 - 1. The Monitoring Framework;
 - 2. The latest Authority Monitoring Report, including reported progress against the requirements for the planned delivery of development and infrastructure;
 - 3. Conformity of policies with national planning policy;
 - 4. Changes to local circumstances (including a change in local housing need);
 - 5. Significant local, regional or national economic changes; and
 - 6. Progress in plan-making activities by other local authorities and the Mayor of London.
- C. Where appropriate, the Council will commence an earlier review of the Local Plan to address significant changes in circumstances. The Council will promptly commence a review of the Local Plan and update relevant policies accordingly if:
 - 1. The Authority Monitoring Report demonstrates that annual housing delivery is less than 75% of the annualised requirement or the projected completion rate (whichever is the lower) for three consecutive years; or
 - 2. The Council cannot demonstrate a five-year supply of deliverable housing land against the requirements established through the Local Plan.

Modification 2:

The package of monitoring material, whether a single report or a number of datasets, should retain the title Authorities Monitoring Report to comply with the Town and Country Planning (Local Planning) (England) Regulations 2012 Part 8, Provision 34. If the motivation for changing the title is LBE's intention to move from a discursive report to a dataset approach, the relevant web page should explain this in a short introductory paragraph.

I refer LBE to the LB Wandsworth Authorities Monitoring Reports (AMRs) page for a possible introductory text.

Modification 3:

LBE should develop, publish and consult as a matter of urgency on a separate document containing all the measures to be included in its Authorities Monitoring Framework and taking into account the deficiencies outlined at Q5. Issue 4 in the indicator/performance measures to its Monitoring Framework.

Modification 4:

In view of LBE's appalling track record, it is essential that Ealing residents have recourse to some higher authority via a non-legal route should LBE fail to fulfil its statutory duties in respect of the review and monitoring of its Local Plan.

.....

I agree fully with Ealing Matters. There is an onslaught of developments in Southall. And when there are failings, there is no time to waste engaging the LGO. There must be a more robust policy that puts onus on the Council to rectify the situation or information and which should be overseen by the Council's own legal department , so that it clearly a matter of governance.

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

As mentioned at Q5. Issue 5, LBE appears to draw a distinction between monitoring data for its own internal purposes (which it appears to prioritise) vs. the statutory requirement for public reporting. I believe, therefore, that it is necessary for the Inspector to hear the views and experiences of members of the public, important users of those reports, in order to arrive at a view on LBE's proposals for review and monitoring.

.....
I agree with Ealing Matters. This should be addressed now by the Council.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Part B – Please use a separate sheet for each representation 5

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	OPEN PLAY SPACE. Policy DAA : Design and Amenity	Policies Map	Southall Development Sites 01SO, 02SO, etc.
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/> No
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Note that this representation concerns standards for the provision of amenity and play space in new development.

London Plan Policy S4A Play and informal recreation requires Boroughs to ‘prepare Development Plans that are informed by a needs assessment of children and young person’s play and informal recreation facilities. Assessments should include an audit of existing play and informal recreation opportunities and the quantity, quality and accessibility of provision.’ Para 5.4.6 of the supporting text describes the London Plan’s approach to off-site provision.

London Plan Policy D6 sets out minimum housing space standards. This includes at AF9, minimum standards for amenity space but indicates that borough development plan documents may have higher standards.

London Plan Policy Table 3.2(iv) and (v) Qualitative design aspects to be addressed in housing developments sets out how private and communal amenity spaces should be addressed

London Plan Policy H16 on Large-scale purpose-built shared living with its supporting text sets out considerations for amenity space that should apply in shared living developments.

Table 7D.2 of Ealing’s current Development Management Plan document (adopted in December 2013) sets out the space provision requirements for new developments. These will still be in force, presumably until the new plan is adopted:

Table 7D.2 Space provision requirements

Provision Type	Area Requirement
Private Garden Space (House)	5 sq. m. per 1-2 person unit, plus 1 sq. m. for each additional occupant*
Private Garden Space (Flat)	5 sq. m. per 1-2 person unit, plus 1 sq. m. for each additional occupant**
Amenity Space	50 sq. m per 1,000 sq. m of floorspace
Public Open Space	19.5 sq. m. per person***
Children’s Play Space	10 sq. m. per child****
Allotments	1.7 sq. m per person
Active Recreation (Outdoor)	7.3 sq. m. per person*****

Unlike in Ealing’s current Plan, the Regulation 19 Plan fails entirely to consider standards for, or the design of, amenity and play space in new developments and it should. With so many new homes proposed, many of them in large residential blocks, it is essential that due provision is made for residents to be provided with outside space to enjoy and play in. As it is not an inner city borough, and one traditionally noted for its green character and its family friendliness, these standards should not be the minimum indicated in the London Plan.

Many recently consented schemes in the borough fail even to meet the London Plan’s minimum standards. Instead, small existing areas of outside space are held as being available to thousands of new residents, many of whom have to cross main roads to access them.

The Regulation 19 Plan is not consistent with important higher level policies and the reasons for this have not been justified. To this extent the Plan is unsound.

The National Planning Policy Framework Chapter 12 establishes that ‘creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this.’

NPPF Para 132 states ‘Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.’

London Plan Policy D1A: London's form, character and capacity for growth (Defining an area's character to understand its capacity for growth) *requires that 'Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth. Area assessments should cover (12 listed) elements'.*

Policy DAA in the Regulation 19 Plan does not respond either to the NPPF's or the London Plan's requirements. It is therefore inconsistent with national policy and therefore unsound. The Policy has not been developed with local communities, does not respond to local aspirations and shows no understanding of Ealing's defining characteristics. While some useful studies of the Borough appear in the evidence base – those by Allies and Morrison look very interesting – they have not been drawn together in any coherent way eg through the preparation of design codes, the public has been given no opportunity to comment on them and it is hard to discern their findings reflected anyway in the Plan Policy.

Instead, the text that supports Policy DAA is unacceptably vague – so much so that it sets no design expectations to guide developers in the Borough.

The problem here for Southall in particular is that the different communities are very much family orientated and require more 3 / 4 bedroom accommodation and also garden space or public open space properly sufficient for the needs of the population that has grown from 70,000 (in about 2013) to 81,000 (as advised by the council) and increasing further at a rate as fast as the developments are progressing. The Allies & Morrisons presentation to the Local Development Planning Advisory Committee LDPAC (22 March 2023) provided detailed information as to housing needs. The Tall Buildings towers of 18 storeys (minimum 6 storeys) in Southall in so many developments on the Development Sites are expected to house some 15,000 units over the next 10 years or so. Taking account of the generational living of people and families in Southall and the cost of living crisis, it is quite typical of a two-bedroom unit/flat two house a family of 3 / 4 adults and two children. The GLA London Datastore (Predicted Population Growth 2021 – 2041 based on London Housing targets) expect London Borough of Ealing's population to increase by about 80,000. If Southall's intended development of what in truth may well be 15,000 units is achieved, then that in itself is likely to produce an increase of population Southall by 80,000 on its own.

It is important to appreciate the breach of various policies relating to play space area and a Public Open Space areas, especially when the population of the borough is increasing so quickly. The AMRs (2014 – 2018) data sets out the POS figures for the seven towns in the borough. Open green spaces , POS and added amenity play space is limited physically and more so in the case of Southall which has always been a densely low urban build and already has low levels of green space.

Not having up-to-date statistics and data as should be presented in AMRs seriously hinders anybody's ability to make assessments of the needs of the different communities in the borough when responding to consultations and considering the

Local Plan at REG 18 or Reg 19. But more importantly it undermines the process of detail needed to support proper and suitable DDA for the Council to execute responsibilities and compliance in planning matters.

Not complying with the regulations to produce proper monitoring and publish it every year in the form of AMRs, must mean that there are defects and things that have to be questioned, as to what exactly is supporting Policy DDA.

There must be proper detailed provisions under Policy DDA to ensure open playspace supporting the high level of development and housing in Southall.

See Exhibit Marked "MD A" - SETTING THE SCENE

1 Southall Development Sites

2 Tall Building areas under Reg 18

3-5 Consider Table of data for : development of housing, sites with tall building thresholds, planning stage reached etc. (Analysis produced by Ealing Matters Reg 19)

6. Ealing net housing completions by reference to each town. Southall densely low rise urban build with huge density of population is set to deliver 36.6% of new homes by introduction Tall Buildings (6 to 18 storey high) on a wide scale.

7 Predicted Population Growth, based on Housing Targets: GLA London datastore.

8 Copy Table S1 Infrastructure Delivery Schedule - uncertain and vague.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

3. Public engagement based on the work by Allies and Morrison (and presented at the LDPAC meeting on 22/03/23) is required to establish the Borough's design expectations as NPPF Chapter 12 and London Plan Policy D1 require.

4. Policy DAA needs to be reworded and expanded to respond to these higher level policies. Policy D1 Design in the London Borough of Camden's plan provides a good template:

The Council will seek to secure high quality design in development. The Council will require that development:

- a. respects local context and character;
- b. preserves or enhances the historic environment and heritage assets;
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- d. is of sustainable and durable construction and adaptable to different activities and land uses;
- e. comprises details and materials that are of high quality and complement the local character;
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
- g. is inclusive and accessible for all;
- h. promotes health;
- i. is secure and designed to minimise crime and antisocial behaviour;
- j. responds to natural features and preserves gardens and other open space;
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
- l. incorporates outdoor amenity space;
- m. preserves strategic and local views;
- n. for housing, provides a high standard of accommodation; and
- o. carefully integrates building services equipment.

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.'

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Design in the Borough has taken something of a back seat in the past 10 years. There is a real need to go back to the drawing board with reference to design in the context of large new developments and to proposed tall buildings as envisaged by the council in Southall. There are insufficient safeguards to protect open green spaces , accommodate playspace and protect existing POS. I would like to make the case for reversing this.

It is a fundamental planning tenet that provision of open space and facilities for recreation underpin our quality of life. The COVID pandemic has demonstrated its importance to individual health and wellbeing, and the promotion of sustainable communities. This point needs to be made.

And in the case of Southall (86% do not identify as white European) different ethnic communities from Indian sub-continent , East Africa , Middle East countries with inter-generational living in over-crowded conditions etc. this is of great concern where affordable housing , howsoever worded is not truly affordable in an area where nearly 25% of the borough live with high poverty indicators, poor education attainment , poor health , high mortality , digital exclusion etc things that prevent them from taking part effectively in their local government planning processes affecting every aspect of their lives.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

N.B Copy documents have been attached for easy reference to 3 exhibits submitted with my original Reg. 19 Representations: “MD A” , “MD B” and “MD C”.

ATTACHMENT “MD A”

**THIS IS THE ATTACHMENT “MD A” REFERRED TO
RE: OPEN PLAY SPACE.
POLICY DAA : DESIGN AND AMENITY**

SETTING THE SCENE

- 1 Map Southall Development Sites**
- 2 Tall Building areas under Reg 18**
- 3 -5 Consider Table of data for development of housing , sites with tall building thresholds , planning stage reached etc.
Analysis produced by Ealing Matters at Reg 19 stage.**
- 6. Ealing net housing completions by ref. to town. Southall is set to deliver 36.6% of new homes and common use of Tall Buildings(6 to 18 storey high) are designated.**
- 8 Predicted Population Growth , based on Housing Targets : GLA London datastore.**
- 9 Table S1 Infrastructure Delivery Schedule - uncertain & vague.**

Ref: The London Borough of Ealing.
Regulation 19 Representations for Local Plan

ATTACHMENT “MD B”

THIS IS THE ATTACHMENT “MD B” REFERRED TO IN REPRESENTATIONS MADE BY MINNI DOGRA

Documents for reference as part of representations / evidence:

1. Copy letter (08 /02/23) of Representations re. Reg. 18
2. Copy Letter (16/01/23) observations & Request Time Ext.
3. Copy email (24/01/23) Re. Southall Walkabout & Time Ext.
4. Copy Letter of representations (28 /09/22) re CPO The Green Southall - contains information relevant to Southall issues touching upon local plan matters, Reg 19 Local Plan etc.
5. Copy letter (21/05/22) from Council Leader to London Mayor stating OAPF is not fit for purpose.
6. Copy letter (15/08/22) from MD to London Mayor re. Southall Reset initiated by Council , objection to withdrawal of South Rd Bridge widening infrastructure, Shaping Ealing survey , removal of OAPF etc.

Part B – Please use a separate sheet for each representation 6

Name or Organisation: XXXXXXXXXX

3. To which part of the Local Plan does this representation relate?

Paragraph	THE WHOLE PLAN	Policy		Policies Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes		No	No
4.(2) Sound	Yes		No	
4 (3) Complies with the Duty to co-operate	Yes		No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Plan has not been produced in accordance with legislative requirements. In particular:

1. This plan is the second to have been prepared by LBE under the Planning and Compulsory Purchase Act 2004. The first was adopted in 2012. The Act and its associated Regulations make no provision for sequential plan-making. Instead, Regulation 10A provides that plans must be reviewed at least every 5 years.
2. Ealing's 2012 Plan was not reviewed. Instead, under the current exercise, it is simply to be ditched with no consideration given to its performance or its continued relevance.
3. For Southall there was the Opportunity Area Planning Framework 2014 (OAPF) and that planning framework was consulted on extensively direct with the local residents. There was the Southall Big Plan for Big Streets , basically to improve pavements and public realm. There were aspects Not consulted on , but the council officers were engaged on the ground direct with businesses and residents between 2008 – 2012. I know because I had my business in Old Southall and engaged with council officers. I still have a record of all my letters , Notes of meetings with them.

4.

In 2021 the Leader of the Council wrote to the London Mayor to say the OAPF for Southall was never consulted with the Public and that the document is "...no longer fit for purpose" in his letter dated 20/05/21 (copy attached to "MD- B"). Since when can a major planning framework like the OAPF be

ditched so easily ? Does the Council Leader have that kind of power? It is this personal “decision” (to ‘dump’ the OAPF) from which the council’s attitude to reviews , planning protocols , AMRs appear to have swayed away from following some regulatory framework and must be considered during this inspection.

5. I can only say the consultation style for the OAPF was different. That was back in 2010 / 2012. The OAPF was finally adopted (after scrutiny by the council) in 2014. The Council had a Southall Regeneration Team and the OAPF was agreed by the then Council Leader in 2014 and Mr Johnson the London Mayor at the time. It would be fair to say the people (residents and businesses) of Southall were Not aware of the implications for Development Sites identified in the SPDs and SPG. I only learnt about it for the first time when objecting and preparing for the Public Inquiry - CPO The Green Southall in 2022.
6. My detailed letter to the Planning Inspectorate dated 28 September 2022 related to a CPO. However many of the matters stated in that document relate to concerns and issues which are certainly relevant for the local plan. It is so detailed that rather than repeating matters it should be sufficient for reference purposes at this stage (copy attached to “MD - B”). All the attachments exhibited and referred to in this letter 28/09/22 are available as a complete set for further reference and can be filed at the appropriate time. Ealing Council are already aware of this letter and exhibits since the CPO enquiry in October 2022 . I copied it to them again under cover of my letter dated 16 January 2024 when responding to Reg.18 plan(copy attached to “MD- B”)
7. In October 2022 (at the PI hearing) I was informed by council officers to partake in the local plan consultation. I didn’t understand what was involved. In a lifetime of living and working in Southall, never before did the council really engage the public on any local plan. So I didn’t respond at that point. I knew Ealing, over the years had the UDP (urban development plan) and interested people in the borough knew the UDP was out of date and that Ealing had no local plan. What that actually meant to us as lay people was, simply put , they don’t do anything because they don’t have a plan. But, was the Southall Regeneration council team working for Southall. We knew it was related to improving Southall and a long term development of 3750 homes on the old gasworks site aka the Green Quarter (approved in 2014), but it will now possibly increase to 8100 new homes.
<https://ealing.news/homes-property/locals-respond-to-planning-application-from-berkeley-group-for-8100-homes-at-southalls-the-green-quarter-up-to-27-storeys-high/>
8. The 2014 Southall OAPF set out details for building heights being no more than 6 - 8 storeys in height and such tall buildings would be appropriate e.g close to railway lines and the Crossrail Station (Elizabeth Line). But , that started to be disregarded by the LPA. The Southall OAPF is still a valid policy as confirmed by LBE in Shaping Ealing Survey 2022. Is anything actually wrong with it ?

9. No consideration or Review of OAPF ever took place in the last 10 years to assess impacts, effects, achievement of aims that were clearly stated at the start in the Southall OAPF. That is where the issue lies. How can we judge OAPF is a failure or inappropriate? And yet the council intend the OAPF to be superseded by this New Local Plan.
10. Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that a Local Planning Authority must notify persons, including residents 'of the subject of a local plan which the local planning authority propose to prepare', and to invite them 'to make representations to the local planning authority about what a local plan with that subject ought to contain'. In preparing its plan, the authority 'must take into account any representation made to them'.
11. Under Regulation 18 Ealing Council did not invite any representations about what the 'New' local plan should contain and so there was no opportunity for residents to make representations as to the things that should be in it. There should have been extensive workshops / engagement once the council had worked out a proper consultation strategy before carrying out any initial surveys. Had they been so invited they may well for example have proposed the plan include policies on the conservation and enjoyment of the historic environment, in Southall the Manor House on The Green, faith buildings, the Railway Arches which is our historic environment that we needed to give feedback.
12. If they had consulted properly on our heritage environment they would have learnt that the Railway Arches are important or all of our many different faith buildings in Southall all built by the many different immigrant communities passing through during the past century, are a part of our heritage. Southall is a dynamic place and that is its heritage. Whose job was it to protect it? The OAPF was quite considerate and empathetic about retaining Southall's character. What was wrong with it? Were there any expert consultancy reports which specifically advised to ditch OAPF?
13. We also needed to respond to London Plan policies for inclusion of amenity and play space standards in large developments. In Southall some large developments have been completed in the form of Tall buildings / tower blocks with a grass verge next to the railway lines to give a 'play space', but without including proper and appropriate amenity and play space standards. Table 1 (Infrastructure delivery) (copy attached to "MD-A") evidences lack of certainty and vagueness about supporting infrastructure for the substantial developments envisaged or "planned" by the council.
14. Southall OAPF 2014 was bedded down. By 2019 a Review was due. The Council should have given more information on further plans for development and sought views. Instead, the residents were consulted on Reg. 18 fully drafted local plan that carries no significant change in scope or content from the Regulation 19 Plan to be examined. Having drafted it before the Regulation 18 consultation, the Council self-evidently had no opportunity to take account, as it is required to, of any representations from local residents with regards its content. It does not therefore meet the requirements of Regulation 18.

15. Having stated all the above, it appears the Council effectively fettered its own judgement. Proper statutory processes have Not been followed as may have reasonably been expected in any type of regulatory framework. Even if there was no direct active engagement by Council with people of Southall, they should still follow rules and regulations , planning guidance and review a policy such as this , especially where so many major development sites had been identified. However, this is not my field and I have no real experience in planning developments and regulatory frameworks and I therefore ask the planning Inspectorate to consider carefully the aspects of compliance in relation to the matters raised and how they may impact on the legality of the Reg 19 local plan now being considered.
16. Being a corporate body with a properly functioning planning department, there can be no good reason / excuse for not reviewing the 2014 Southall OAPF , five years later to appraise things properly. The detailed review could have taken place in 2019 (before Covid). Admittedly we were all stopped in our tracks by Covid and things slowed down in February 2020 and came to a halt in March 2020. But council officers were still “working from home” (WFH). Corporate property developers , architects , planners etc. were all WFH. Some Southall development consultations with the public were taking place during this difficult period coming out of Covid. Indeed they prepared the Shaping Ealing survey because they had already decided on their approach (May 2021), and probably the reason the Leader of the council wrote the letter to the London Mayor (copy attached to “MD- B”).
17. There is a widespread perception that the council and the developers steamrolled the consultation procedures in relation to many developments without genuine engagement and consultation 2020 onwards.
18. The Council seeks to rely on Shaping Ealing Survey and in particular the results from Southall respondents’, to argue that this “survey” was conducted to feed in to a draft local plan, taking account of views and expected to say the Reg. 18 Local Plan is a true reflection of residents’ and community views. The Shaping Ealing Survey was never given any great prominence in the Borough (in 2020/ 2021) or supported with Workshops. Nothing in the 9 stations around the borough. But, it was the time of Covid.
19. It came as a shock to the Council when an unprecedented number of responses to the Shaping Ealing survey (10,000 in a population of 367,000) of which about 1,000 were from Southall.
20. The reality was the Reg 18 plan was drawn up with the council’s own 3 key policies in mind: Housing, Climate and Inequality. With hindsight, it can be seen the council were trying to fit the Shaping Ealing survey results in to their already draft Reg 18 local plan. These things only began to make sense once the Reg 18 draft local plan was published in December 2022.
21. In 2021 the council commissioned various reports from consultants / experts. I read many of these reports relating to Southall. The council was in control of exactly what reports were being commissioned. Therefore the Reg. 18 local plan was exclusively council led from the

very start. Reg 18 local plan was not lead by any proper public consultation. In January 2023 the council were merely going through the motion of asking the public what we thought of the councils' own Reg.18 plan.

22. This current plan is not based on information that Government legislation and regulations require it to be based on:

- Section 35 of the 2004 Act requires planning authorities to prepare and publish Authority Monitoring Reports (AMRs) over no more than a 12 month period which describe '*the extent to which the policies set out in the local development documents are being achieved*'. Regulation 34 of the Town and Country Planning Regulations 2012 requires that AMRs showing progress with policy implementation must be published every year. No AMRs for Ealing to inform this plan with regards essential housing delivery data have been published since the year 2013-2014.
- With an 'interim' and incomplete AMR covering the years between 2014/15 and 2018/19 published in 2021, no AMRs of any description covering the past 4 years inform this draft plan.

In October 2022 I engaged in a Public Inquiry concerning the compulsory purchase order relating to Development Site at The Green Southall / Featherstone Terrace Car Park (Ref: APP/PCU/CPOH / A5270/3289084), involving issues surrounding Tall buildings / towers, breach of OAPF 2014 / Tall buildings / towers, overdevelopment / proposed developments causing harm to locality , character of area , diverse ethnic communities etc. but such objections related more to the local plan, rather than the compulsory purchase regulations. Please accept this letter 28/09/22 (" MD – B") as part of my objections / representations .

23. Only at the Public Inquiry Hearing did Southall people learn that the development actually involved was much bigger: 6 towers (19 storeys each) and 1 highrise aggressively dominating over the traditional high street , War Memorial , Southall Manor House and gardens, St Anslem's church and the traditional high street in the King Street Neighbourhood. The development was unrecognisable. The principles and directives agreed in the OAPF were disregarded. Is that legal? Does it go against the regulatory compliance matters in planning laws?

24. My letter for Reg. 18 Representations 07/02/23 (copy attached to "MD-B"). There are several matters stated in this letter which are relevant to the subject of Reg 19 New Local Plan and form part of my representations.

25. There are several matters stated in my copy letter 28/09/23 (copy attached to "MD-B") which are relevant to the subject of Reg 19 New Local Plan.

26. I raised the absence of up to date AMRs at the PI hearing. I became familiar with data and statistics relating to planning applications , public open spaces (per 1000 population) , density of population etc. An

Interim AMR (covering 2015 – 2019) was published in 2021 as a result of Ealing Matters' ongoing efforts and their application to the local government ombudsman.

27. I was informed that up to date AMRs up to 2022 would be available by December 2022. That did not happen. We do not have the correct data which is needed when appraising the Reg 19 local plan. What proper and correct data are the council relying on when pursuing the Reg 19 Local Plan ?

28. Regulation 3 of the Town and Country Planning (Brownfield Land Register) Regulations 2017 requires local planning authorities in England to prepare, maintain and publish registers of previously developed (brownfield) land. These should form part of the SHLAA. Ealing has not produced a brownfield land register since 2017. Information on brownfield sites required by the Regulations is not therefore available.

Documents for reference as part of representations / evidence: Exhibit marked "MD- B"

1. Copy letter (8 /02/23) of Representations re. Reg. 18
2. Copy Letter (16/01/23) observations & Request Time Ext.
3. Copy email (24/01/23) Re. Southall Walkabout & Time Ext.
4. Copy Letter of representations (28 /09/22) re CPO The Green Southall contains information relevant to Southall issues touching upon local plan matters, Reg 19 Local Plan etc.
5. Copy letter (21/05/22) from Council Leader to London Mayor.
6. Copy letter (15/08/22) from MD to London Mayor re. Southall Reset , objection to withdrawal of South Rd Bridge widening ,Shaping Ealing survey , removal of OAPF etc.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I am not sure. I do not know how the very serious omissions described above can be legally remedied. I want Ealing to have an up to date development plan and Southall to keep the OAPF, but I am concerned that this plan has not been prepared in accordance with legislation requiring plans to be based on:

- reviews of past plan performance
- relevant evidence, especially with regard to house building
- engagement with local communities

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

 Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I think it is important to press the need for planning to comply with Government legislation and regulatory frameworks. Whether it does so or not should not be optional.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Part B – Please use a separate sheet for each representation 7

Name or Organisation: XXXXXXXXXX

3. To which part of the Local Plan does this representation relate?

Paragraph	Tables SS1, A1, E1, G1, H1, N1, P1 and S1	Policy		Policies Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	NO
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Infrastructure

I agree with Ealing Matters and thank you for setting out the details of the frameworks and policies that are applicable when addressing the issues arising in connection with this Reg. 19 local plan.

NPPF Para 20. Requires that:

‘Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat).

NPPF Para 34 requires that:

‘ Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure).’

London Plan Policy D1.B states that:

‘In preparing Development Plans, boroughs should plan to meet borough-wide growth requirements, including their overall housing targets, by:

2. assessing the capacity of existing and planned physical, environmental and social infrastructure to support the required level of growth and, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth;

London Plan Policy S1.A states that:

When preparing Development Plans, boroughs should ensure the social infrastructure needs of London's diverse communities are met, informed by a needs assessment of social infrastructure.

London Plan Policy D2B Infrastructure requirements for sustainable densities states:

'Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly.'

The kind of infrastructure planning envisaged by both the NPPF and the London Plan is entirely absent from the Regulation 19 plan. No attempt at all is made to get to grips with the type or the scale of the infrastructure support Ealing's housebuilding targets will require. In this regard the Plan is inconsistent with national policy and therefore unsound.

This failing is of great significance to the large-scale development proposed for Southall. Southall's density of population is at crisis level. The level of development is unsustainable for the simple reason that space is extremely limited in a densely built urban setting. The people of Southall are aware of the acute need for housing and can never be labelled as NIMBYs ("not in my backyard"). The great majority of residents here hardly have an outdoor space to call "back yard". In the AMRs going back to 2014 the council were consistently using the figure of 70,000 for the level of population in Southall. Southall people are acutely aware of the levels of overcrowding not only in housing, but also in the pavements, roads, buses, bus stops, trains, platforms. Everywhere. The population of the borough has increased now to 367,000 (ONS 2021). Almost 25% of the residents in the borough live in Southall. There is a crisis of just living in Southall. Having done so much ground work using data without reviewing and updating the AMRs how can the council plan infrastructure for the existing and growing population of Southall against a background where new housing developments envisage more people coming into this town.

For the first time (in the Reg 19 plan) the council referred to Southall as having a population of 81,000. Because Southall has a transient and hidden population, the experience of Southall people leads them to believe that population is probably more in the region of 90,000 at the present time.

While the plan itself omits to say how many new homes will be provided over the plan period, the Housing trajectory in the Council's evidence base puts the figure at 41,571. ("MD A"). This figure is close to London Plan expectations if current targets are carried forward beyond the end of the London Plan horizon as the housing trajectory assumes. The Plan and the evidence base both fail even to consider what this might mean in terms of the growth of the population that will need to be supported by additional physical and social infrastructure. The best evidence of what this might be can perhaps be found in the GLA's population forecasts ("MD A"). These use borough housing targets to predict that if Ealing's housing stock grows at the London Plan's target rate the Borough will be housing 80,317 additional people by 2041 – more than the current population of the City of Guildford. Of London Boroughs, only Tower Hamlets (marginally) and Newham will grow faster.

Southall will bear the brunt of the increase in population. There is a transient population as evidence in Southall schools where families and children are documented as moving in or out. There are many people without children and it is much harder to track just how transient they are. Even without the current cost of living crisis/affordable rent issues, it is common to find

four adults in a two-bedroom flat. It is also quite common to find in an intergenerational family consisting of five people in the flat for perhaps seven people in a three bedroom house. Another serious issue facing Southall presently is the number of young single men who have arrived from the Indian subcontinent (with the appropriate care worker visas), only to find that there are no jobs in the care industry because of local authority funding restraints. These single men are basically unemployed and often sharing a room with others on sleep only basis. They are on the precipice of homelessness.

Considering the quote “infrastructure delivery schedule” it is concerning that there is nothing concrete about the provision of infrastructure to support the high volume of construction already underway. Most of the infrastructure provision is marked “TBC”, presumably means “to be confirmed” (“MD A”). The infrastructure matters are long-term projects and provision takes a great deal of time to put in place e.g schools, GP practices, medical centres etc. not something that you are just waiting to confirm. Provision of infrastructure services need long-term planning. There is no indication in this table which gives confidence that infrastructure matters are in hand.

The developments that are envisaged for Southall must be supported with appropriate and proper infrastructure. During the past two years the electricity National Grid and Thames water (water companies) have warned that they cannot keep up with the energy, water and wastewater requirements of the new developments. They have reported directly to the London Mayor and no doubt the council are aware of these issues. The council still need to make a great deal of progress in arranging the necessary infrastructure to support the town.

Considering the five year housing land supply position, it appears that Southall is expected to build about 15254 new homes/units (“MD A”). The great majority of the new builds are two-bedroom flats. Based on the anecdotal information I have just given, 15,000 new homes will on average house at least four residents. That means a minimum figure of 60,000 new residents coming into Southall over the next 10 years or so. How will the new population be given green open space or public open space (POS)? Space is severely limited in Southall (see the table copied from the AMR attached at “MD A”). Consider the AMRs going back to 2014 – 2019 to see that the POS per 1000 was fairly low in each of the Southall wards when compared to the rest of the Borough . Since there have been further developments (and more are expected), it’s reasonable to guesstimate that POS in Southall will be further reduced per 1000 people.

An Infrastructure topic paper prepared for the Council by Ove Arup published in October 2022 as part of the regulation consultation found huge existing gaps in most of the Borough’s infrastructure which it attributed to the age of Ealing’s existing infrastructure as well as recent population growth. Recognising this, the Regulation 18 consultation promised that an infrastructure delivery plan (IDP) would be published in early 2023. This only appeared, and without good notice, in February 2024 along with thousands of pages of other new documents in the Regulation 19 evidence base, allowing no time at all for the public to comment or input into it.

Part 1 of the IDP reviews the provision of different infrastructure categories. It seems to have been written by individual service providers, and there was no public input. This is unfortunate as it makes for self-congratulatory and uncritical reading. For instance, while the opening of the Elizabeth line is noted, the public had no chance to say that just a year into its operation the service is already operating at above capacity so that at the smaller stations like Hanwell and West Ealing passengers are unable to board at peak times. Had they had a chance to comment, people would say that with the situation as it is now, things look like being much worse at the end of the plan period when 15,000 new homes in Southall alone will significantly increase commuter demand. With no input from the public, the plan cannot be deemed to have been positively prepared and is therefore unsound.

Another concern that would doubtless emerge from a proper public consultation is the extent to which the Part 1 baseline report down plays the significance of road infrastructure

compared with other transport modes. While the majority of the population no doubt acknowledges the need to reduce our dependency on the petrol engine, many communities and our economy as a whole have grown around it and it will continue to be the dominant mode for moving goods and vehicles for years to come. The IDP must acknowledge and reflect on this, if only to manage the transition to more sustainable modes and a carbon free environment as Policy SP2: Tackling the Climate Crisis requires.

This base line report covers most other key areas of infrastructure inadequately. To take just three examples:

- Section 2.10.2 notes that ‘Flooding and sewer overflows are major issues in Ealing’ without quantifying the extent of the problem or the trajectory of its growth. Roadworks by Thames Water contractors are already a considerable nuisance yet there is no recognition how much worse they will get with the additional pressure on the sewer network that the construction of so many new homes will impose.
- Well publicised capacity constraints in the supply and distribution of electricity in West London threaten to prevent connections for new development are noted but their description is heavily fudged. This is not good enough. If these problems are not addressed and Ealing’s targets are to be met, the Plan needs to be confident that they can be connected to the grid.
- Coverage of community centres is extremely narrow and ignores the closure by the Council of many existing facilities that will no longer be available to incoming residents many of whom will arrive from foreign countries with no links to the existing community.

These examples (many others could be cited) show that area’s needs in this regard have not been objectively assessed which make the plan unsound.

The three main bullet points made above apply more so to Southall. There is physically no more space in Southall to accommodate any further structures. It almost impossible to widen roads and pavements to accommodate the increasing population. These are serious challenges and risks failure of infrastructure support for our growing populations.

Part 2 of the IDP sets out what is called an Infrastructure Delivery Schedule that culminates in a long list of projects which carry into Chapters 3 and 4 of the Regulation 19 Plan. These projects appear to have been identified by the individual service providers with no public input of any kind. There is no evidence how these projects fit with the systematic needs assessments that London Plan Policies D1B and S1 require. There is no discussion of levels and shortfalls in existing provision, let alone the demands that will be placed on the borough when 80,000 more people live here. Most are uncoded, have no secure funding and their delivery phasing of most is described as TBC (does this mean to be confirmed?). There is very little prospect of them being delivered which means the Plan will not be effective and so must be deemed unsound.

Perhaps the most serious omission in the plan is the absence of a clear funding strategy to meet the considerable infrastructure spending demands to support the construction of 40,000 new homes over the plan period. Policy SP4.1 refers to the Brough’s parallel consultation on the introduction of CIL which is intended to be a means for funding the social infrastructure to support the developments that the Plan requires. The documentation supporting the consultation appeared without any prior public notice or comment. It comprises a 4 page announcement stating the levy developers will be charged. This is supplemented by BNP Paribas’s 200 page Local Plan Viability Assessment’. The purpose of this latter is not entirely clear but it seems to offer no revenue forecasts, and no explanation how the Levy will be applied or reported on. Unfortunately, it seems that the CIL proposals are not to be examined with the rest of the Plan which will make it impossible to explore these matters.

Please note 4 pages have been added at the end under this section 5.

(Continue on a separate sheet /expand box if necessary)

Name: XXXXXXXXXX

Continuation sheet for Tables SS1 , A1, E1, G1 ,H1, N1 , P1 , and S1

INFRASTRUCTURE (this sheet has been added at the end of the form)

Southall

Roads, transport and public realm etc. are very important for the infrastructure of Southall especially because of the level of developments and the rapidly increasing population. Below are some important points that need to be made to emphasise the seriousness of the lack of supporting infrastructure for the many new developments. The perception and concern is that infrastructure is not a relevant and proper consideration for the Council in the planning and policy process:

Schools, education , recreational community facilities etc – social infrastructure

1. With the increasing population Southall continues to be a popular place for families of different cultural and ethnic origins. Consideration must be given to the need for more schools and education facilities as well as recreational facilities. When pupil numbers swell, local schools are required to build an extension to house more classrooms or facilities. Inevitably open green space is built upon through the back door, by using school land/fields. Without affecting the open green space/ POS data (in AMRs) Southall already minimal green areas are lost through the back door. The AMRs data must be examined to appreciate the points made and consider just how many school extensions are allowed by the council. Open green space/POS is supporting infrastructure. Southall and South Acton towns both have very little, yet are designated for large-scale housing developments.
2. New schools are required, but in the dense low level urban build of Southall there is no large area of land available to build a new school. Therefore, when the need arises schools are extended and their green field/land (if any) is used for the extensions. Ironically the infrastructure school is then provided, but at the cost of real reduction in green space.

Waste water , Drainage , Sewers etc.

3. There must be adequate provision for water waste. People complain (anecdotal evidence) that the drains, wastewater, blockages occur regularly in the new developments. There are problems in Southall's new developments with reference to supporting infrastructure for waste water, drains , sewers which need to be investigated and addressed. This infrastructure appears to be inadequate for the level of development taking place in Southall.

Industry, jobs, roads, transport etc.

4. The council wants to create industrial places to encourage industry, businesses, employment and jobs as set out in Reg. 19 local plan. These places and buildings can be built on designated land, but they need a proper road and transport infrastructure. Many existing businesses have huge problems in navigating the narrow roads of Southall. The increasing population has exacerbated the problems with the narrow roads. These are physical limitations. Coming off the M4 may be relatively easy, but then it can take another hour from Western Road to, say Bridge Road industrial estate. The businesses who are flexible manage to adjust their times to avoid the worst traffic congestion times (just like the local residents do). In time, given a chance many of these businesses will leave Southall because the internal road logistics are so poor.
5. There is no proper road infrastructure supporting the local industries. You can get off the M4 or at busy Heathrow airport, but Southall itself is a bottleneck. The issues can only be addressed if serious consideration is given to road and transport infrastructure. This would be a massive undertaking and requires years of planning. And there was a plan related to the gasworks site (approved in 2014), for the South Road Bridge Widening scheme to also support the gas works development / the Green Quarter and Crossrail Elizabeth line station. A copy is attached "MD C" . Reg 19 has no such provision.
6. People don't cycle generally in Southall, but nevertheless cycle lanes can be created for future generations since the council wants to bring about a culture change. That doesn't mean that Southall people are lazy and obese. Southall population is ageing. High poverty factors impact health outcomes. But cycling is not seen as the antidote by local people. However, people use public transport extensively and walk a lot. Often it is easier to walk than even take a bus, because the bus gets caught up in traffic which is mostly caused by construction work on various developments and roadworks.
7. In the Shaping Southall survey, the Southall people indicated overwhelmingly the need for improvement when asked a question related to "cycling and walking" where both modes had been paired together. That question should have been split into two separate questions: one for cycling and one for walking. The people in Southall are Not demanding cycle lane improvements. They are demanding improvements for the public realm; to fix the narrow cracked, broken, slanted pavements and where possible to widen pavements but that is often physically impossible as all the streets and pavements in this old Victorian town are narrow. There are absolute concrete physical limitations in this town. This poses a serious problem for how the council can provide public realm infrastructure improvements against a backdrop of overpopulation and overcrowding. There is no such policy in the Reg 19 plan.

8. The Council carried out the Shaping Southall survey (part of Shaping Ealing survey). The consultation processes relating to the development of the Gas Works site aka the Green Quarter went on for years and was very much part of the Southall OAPF 2014. It was agreed that a road widening scheme was absolutely essential on the South Road railway bridge where Southall station is situated (Elizabeth line) as part of the necessary road infrastructure. It was tantamount to a planning condition for the planning granted for the large development of 3750 new homes close to Crossrail. The Council received the negative response from Shaping Southall . The Council Leader wrote a letter 21/05/21 ("MD B") to the London Mayor wanting to ditch the OAPF and the South Road Bridge Widening Scheme - a road and bridge infrastructure plan and presented the Southall Reset papers July 2022. Copy at "MD C". Without any consultation Southall lost a long overdue road/ bridge widening infrastructure scheme, to be replaced with a policy of more cycle lanes and emphasis on climate change policy. I raised objections with the London Mayor letter 15/08/22 on behalf of Southall people. Copy at "MD C"

Climate Change , Health , Mental well-being , Pollution, Overdevelopment etc.

9. Climate change policies are arguably a part of supporting infrastructure for clean air and reduce pollution. At the same time there are too many demolitions and new build developments which carry their own huge carbon footprint and high levels of pollution as well as disturbance of contaminated land/brownfield land. Indeed the development of the gasworks site caused huge issues of escape of contamination and pollution causing many people in Southall to become ill about 2018 – 2020. During Covid (it is well documented) Asian / African origin people and others of dark skin were found to have more respiratory / health issues and poor health outcomes. Southall's high poverty factors and ageing population (well-documented) was also relevant. The irony of it all is the council pushes for development / overdevelopment and people's health and mental well-being suffers more due to high levels of pollution, respiratory issues, overcrowding and mental stress of living in Southall.

10. Community facilities are important for the existing population as well as taking into account the increase in population (increased from 70,000 to at least 81,000 in 10 years). Due to the various housing developments (that continue) and other factors such as the "hidden" population and transient people, it is more likely that the population is in the region of 90,000. In February 2022 the Council intended to demolish the Southall Youth Centre building (hardly 20 years old) in favour of yet another housing development. The Southall community objected strongly. I refer to a detailed response by letter 12/05/22 made to the consultation carried out by consultants Lichfields (a copy is attached to "MD C"). The Reg. 19 local plan should have a formal policy to retain community buildings and facilities so that there is supporting social infrastructure for the increasing population in the Borough.

11. The copy documents attached to Exhibits marked: "MD A" "MD B" and "MD C" with all my detailed letters are used to support my representations in relation to Reg19 local plan response. I also wish to reserve my right to refer to any of the 19 Exhibits attached to my CPO Representations letter 28/09/22. The council already has a complete set of exhibits from the Inquiry. If the Planning Inspector wishes to have a copy set , I have a set ready to send. I appreciate that the my Reg.19 Representations and Attachments here are lengthy and I thank you in advance for taking the time to read them. I have no expertise in dealing with these matters and to that extent I am a layperson dealing with things that are highly specialised. When making these Representations people like me/us are full of trepidation , thinking that what we have to say may not be relevant or does not count or meet some threshold that we are unaware of in planning development / local plan terms.

During the past two years I have engaged in what is essentially planning development issues affecting Southall, but I do care about the whole Borough having spent my life living and working here. I have read a substantial amount of development planning documents, SPDs, SPGs, OAPF, Planning Applications, AMRs etc. so that I could engage this process , put forward coherent arguments to state the case on behalf of myself and the great majority of people in Southall. I hope that the time I have spent in responding formally to the Regulation 19 stage has been a worthwhile exercise from the Planning Inspectorate's point of view.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Plan needs to be informed by an assessment of the Borough's physical and social infrastructure needs as London Plan Policies D1 and S1 require.

Working with local people as NPPF Para 15 requires, the Plan then needs to make provision for infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, and energy (including heat) as NPPF Para 20(b) requires.

In accordance with NPPF Para 34 the Plan should set out the contributions expected from development. Along with setting out the levels and types of affordable housing provision required this should include that needed for education, health, transport, flood and water management, green and digital infrastructure and it should form part of this plan, and not a separate document.

Policy DAA of the Plan also needs to respond to London Plan Policy D2B by making clear that development must be contingent on the provision of required new infrastructure, including public transport services, and that if necessary it must be phased accordingly.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

 Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I would like to elaborate on the problems that will arise in Ealing without an adequate infrastructure plan to support the delivery of over 40,000 new homes

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Ref: The London Borough of Ealing.
Regulation 19 Representations for Local Plan

ATTACHMENT “MD C”

THIS IS THE ATTACHMENT “MD C” REFERRED TO IN REPRESENTATIONS MADE BY 

Documents for reference as part of representations / evidence:

1. South Road Bridge Widening Scheme at **Appendix 4** dated June 2022 attached to Southall Reset Committee papers dated 13/07/22.
2. Copy 13/07/22 Southall Reset Committee papers re. Southall Reset Programme which refers to Southall consultant reports and attached to original papers. 5 separate appendices.
3. Copy Letter 15/08/22 MD to Mayor of London Representations planning 215216FUL re. 13 -15 The Green UB2 4AH and Southall Reset first initiated by Council 21/05/21 , objection to withdrawal of South Rd Bridge Widening infrastructure etc.
4. Copy letter (12/05/22) from MD to Lichfields Consultants Representations re Southall Youth Centre (community facility / social infrastructure).

Part B – Please use a separate sheet for each representation 8

Name or Organisation: XXXXXXXXXX

3. To which part of the Local Plan does this representation relate?

Paragraph Policy **Southall S2** Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	NO
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Local Plans should comply with higher level policies including the NPPF and the London Plan. The NPPF says

The development plan must include strategic policies to address each local planning authority’s priorities for the development and use of land in its area.

Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment

SOUTHALL Policy S1: Southall Spatial Strategy

Spatial vision for Southall

A. Future development and investment in Southall will celebrate and strengthen the unique character and heritage of Southall as a cultural destination of national importance. It will capitalise on Southall's strategic location on the Elizabeth line and its proximity to Heathrow Airport to maximise economic opportunities for the area and will primarily focus on a cluster of sites around Southall Station. More attractive town centres and cultural programming will increase visitor numbers from other parts of the borough and neighbouring boroughs, to help support a thriving economy.

B. Southall's role as a Major Centre in London's town centre hierarchy will be strengthened, with a good range of retail, commercial, leisure and community uses provided and enhanced public realm, additional greening and improved active travel links (see Policy S2).

C. King Street Neighbourhood Centre will complement Southall Major Centre, whose offer will be enhanced bringing together new commercial space and a public square at The Green, with the existing shopping parades and enhanced community spaces (see Policy S3).

D. West Southall will deliver a new residential and commercial neighbourhood and an extension to Southall Major Centre. This will act to strengthen and complement the role of Southall as a Major Centre, providing new public realm, social, community and green infrastructure (sPolicy S4).

E. East Southall will deliver mixed use development of residential, convenience retail, community, cultural, and leisure uses led by quality commercial spaces designed to better optimise the use of the land (see Policy S5).

Tackling the climate crisis

F. Active travel connections will be improved throughout Southall and specifically by:

(i) Establishing a key north-south active travel corridor running from Lady Margaret Road down to the Grand Union Canal, via Southall Major Centre and King Street Neighbourhood Centre, including Avenue Road and Merrick Road.

(ii) Improving connections across the railway at Dudley Road, South Road, and Windmill Lane, connecting the West Southall Development Site with King Street Neighbourhood Centre.

(iii) Linking in with active travel improvements along the wider Uxbridge Road, upgrade the provision of safe cycle routes and crossings, ensuring continuous provision and easy access to town centres in Hanwell, Ealing and Acton.

(iv) Supporting social movements led by Let's Go Southall to deliver a long-term behavioural and cultural shift towards active travel.

(v) Working with the Heathrow Strategic Planning Group (HSPG) and associated authorities and other parties including Heathrow Airport and Hillingdon Council to establish high quality active travel networks across the Heathrow Interaction Area and improve 24-hour travel connections to support shift workers.

Fighting inequality

G. The health and wellbeing of Southall's residents will be improved by:

(i) Adding to the network of green open spaces particularly in deficient areas in the western and southern parts of Southall. Improving the quality of green open spaces through a coordinated programme of environmental and safety enhancements, tree planting, greening and facility improvements including the creation of a Local Nature Reserve.

(ii) Strengthening connections to the Brent Valley Park and Grand Union Canal, with a focus on improving pedestrian and cycle access and wayfinding and implementing the Southall Grand Union Canal Wellbeing Way Project.

(iii) Improving access to primary healthcare infrastructure at Southall Jubilee Gardens and Lady Margaret Road medical centres. Identifying opportunities for space for health infrastructure/services in new developments and retrofit projects in south-eastern Southall.

(iv) Enhancing existing social and community infrastructure, improving accessibility to facilities, and identifying opportunities for new social and community infrastructure in new development projects. This will include addressing specific needs for a homeless shelter, an inter-faith forum and for young people.

(v) Providing new play pitches and sports facilities on the Southall/Hanwell borders.

H. Future development will recognise the role of good design, heritage and culture in place-making by:

(i) Taking active measures to secure the future repair, reuse, and long-term survival of heritage assets including Norwood Green Conservation Area and Norwood Hall which are currently identified on Historic England's Heritage at Risk Register.

(ii) Delivering growth in and around Southall's two Conservation Areas at Norwood Green and at the southwest stretch of the Grand Union Canal through careful, contextual design that is informed by existing character areas and promotes heritage assets.

(iii) Promoting the strong cultural offer of The Broadway, South Road, and The Green for banqueting, conferencing, festivals and performing arts, along with retailing and restaurants.

(iv) Celebrating the rich heritage of Southall and harnessing it as a tool to promote awareness, learning, regeneration, and community cohesion.

(v) Retaining and reinforcing Southall's identity by ensuring new development meets the highest design standards and responds positively to the local character and heritage.

(vi) Making improvements to public realm and ecology along the Grand Union Canal towpath.

(vii) Public realm interventions at Southall and King Street centres to make streets greener and more attractive, and combat perceptions of poor safety and vulnerability to crime.

(viii) Strengthening the relationship between neighbourhoods in Dormers Wells and Lady Margaret and Greenford Town Centre through public realm improvements and wayfinding signs.

Creating good jobs and growth

I. Southall's strong industrial base with specialisms in wholesale, warehousing and logistics, and transport will be supported and enhanced through:

- (i) The provision of a variety of employment spaces within easy reach of Southall Station, encouraging a diversity of tenants and higher-value job opportunities and higher paying jobs utilising varied and innovative typologies, plot and unit sizes with flexible floorplates, internal heights and affordability ranges.
- (ii) Protecting Strategic Industrial Locations (Great Western SIL) and Locally Significant Industrial Sites (Bridge Road, Featherstone and International Trading LSIS), improving densities, and ensuring the longevity of these employment sources.
- (iii) Redesignating Charles House and the Balfour Business Centre as LSIS to provide further protection for currently valuable non-designated industrial land.
- (iv) Supporting masterplan-led co-location of housing on Locally Significant Industrial Sites provided there is no net loss of industrial floorspace and an increase in employment density.
- (v) Capitalising on the proximity of Heathrow Airport in terms of supporting local jobs and local supply chains.
- (vi) The provision of affordable and managed workspace in Southall for small and medium enterprises (SMEs); this includes allocating affordable and managed workspace at future Development Sites in East and West Southall, as well as in the King Street Neighbourhood Centre.
- (vii) Capitalising on the presence of the West London College Green Skills Hub to create green jobs by identifying industry champions to lead future curriculum development and define business needs in Southall.
- (viii) Developing an Inclusive Economy Plan responding to the specific conditions of poverty and deprivation and looking at the utilisation of key public sector assets to foster growth and regeneration.
- (ix) Exploring with the GLA, Film London, landowners and other stakeholders the feasibility of establishing a film studio campus in Southall.

J. The specific housing needs of Southall residents will be addressed by:

- (i) Delivering more genuinely affordable housing to tackle deprivation and low income particularly in Norwood Green, Southall Broadway, and Southall Green wards.
- (ii) Promoting innovative design solutions to facilitate inter-generational living both as part of new-build housing developments and through the adaptation of existing homes.
- (iii) Moderate levels of development at Golf Links Estate and Havelock Estate will regenerate these urban environments and encourage local provision of social infrastructure and convenience goods stores.
- (iv) Meeting other specific housing needs to Southall.

K. The key infrastructure delivery priorities for Southall are set out in Table S1.

The spatial vision stated by the council for Southall does not reflect what the people of Southall see around them every day. The OAPF 2014 has been in place, in reality for more than 10 years. The words all sound so great and positive and the impression given is very different from what is being achieved on the ground. Progress is too slow. Instruction too fast and what started out as “regeneration” feels more like “degeneration” since it all started during Covid locked down and just after that. The various projects detailed above, generally cannot be seen as being achieved. Each numbered paragraph needs careful examination in order to address whether they meet the basic requirements of complying with higher level policies including the NPPF and the London Plan as set out at the start of this Box 5.

An ordinary layperson does not have the skills and expertise to make useful and critical friend comments. But, we can say things about what we can see happening on the ground. In that respect we do not see much progress here in Southall. The planning inspector’s request to interrogate this detailed description and make judgements as to whether it is achievable or deliverable because when things are spread so far and wide, little can be achieved because there is no proper focus.

To make Southall a more balanced retail shopping place. Southall no longer has any of the main retail supermarkets. Lidl left in 2023. Pound Land left also. In March 2024 the main Southall crown post office was closed on the Broadway. It is incumbent upon the council to carry out a detailed consultancy investigated report as to why Southall cannot attract a main retailer supermarket.

People and in particular elderly people get on the 207 bus and go to the next town in Hanwell to go to Lidl. At the same time the council want to make a 20 minute town where we can all walk or cycle for our basic services. The council should be approaching local businesses to find out how they are faring in the current cost of living crisis. Southall businesses have shown to be resilient over the past 50 years, but the shopping high street is or has entered a difficult period. What policy do Council have to address these issues and particularly since there is no Chambers of commerce as the council never allowed them to returned to the Southall Manor House and the organisation died a quiet death.

The council should take steps to engage both businesses and residents to find a way forward on how to achieve spatial improvements. The council should positively support residents and businesses to form groups of their own with direct links to council officers to help make positive and achievable plans for improvements.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I do not think I have the relevant skill set to make any alternative suggestions except to re-examine Policy S1 to make it more digestible and something people can understand rather than just paragraph after paragraph of words.

I would suggest that there should be more consultation with local people who are genuinely interested in the better development of Southall as a good place to live and proud to call your hometown.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

It is important to inform this process, the council and the local plan of how, whatever changes have taken place are perceived by those of us who live here and thereby help to have a new local plan that is workable.

The process is important since as residents we are being consulted.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Part B – Please use a separate sheet for each representation 9

Name or Organisation: XXXXXXXXXX

3. To which part of the Local Plan does this representation relate?

Paragraph Policy **Southall S2** Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	NO
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Local Plans should comply with higher level policies including the NPPF and the London Plan. The NPPF says

The development plan must include strategic policies to address each local planning authority’s priorities for the development and use of land in its area.

Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment

SOUTHALL Policy S2:

Policy S2: Southall Major Centre

To reinforce Southall's role as a Major Centre by:

(i) Maintaining and enhancing the range of retail, commercial, leisure and community uses in Southall Major Centre by strengthening and diversifying the commercial core through active frontages, mixed uses, active travel enhancements, public realm interventions and creating greener and safer spaces.

(ii) Creating a vibrant high street network to offer mainstream and specialist goods and services for local residents and visitors throughout the day and evening.

(iii) Expanding Southall's reputation as a shopping destination within the wider region with supporting visitor infrastructure and environmental and public realm improvements.

(iv) Improving the arrival experience at Southall Station with new and enhanced public realm and Station with new and enhanced public realm and better connectivity to neighbouring Development Sites, ensuring there is active ground-floor level usage in all new developments.

(v) Strengthening connectivity to neighbouring town centres at Hanwell and Greenford to ensure that the majority of residents' daily needs can be met conveniently.

(vi) Improving the out of hours and 24 hour-offer of Southall's centres to support shift workers and long-distance commuters, while avoiding amenity impacts.

(vii) Taking active measures to secure the future repair, reuse, and long-term survival of heritage assets and prominent buildings in the Town Centre including the Kings Hall Methodist Church, South Road (local heritage asset), the Himalaya Palace Theatre, South Road (GII*) and the Old Town Hall and former Fire Station, High Street (local heritage asset).

The Southall Major Centre stated by the council for Southall does not reflect what the people of Southall see around them every day. The OAPF 2014 has been in place, in reality for more than 10 years. The words all sound so great and positive and the impression given is very different from what is being achieved on the ground. Progress is too slow. Construction too fast and what started out as "regeneration" feels more like "degeneration" since it all started during Covid locked down and just after that. The various projects detailed above, generally cannot be seen as being achieved. Each numbered paragraph needs careful examination in order to address whether they meet the basic requirements of complying with higher level policies including the NPPF and the London Plan as set out at the start of this Box 5.

An ordinary layperson does not have the skills and expertise to make useful and critical friend comments. But, we can say things about what we can see happening on the ground. In that respect we do not see much progress here in Southall. The planning Inspector is requested to interrogate this detailed description and make judgements as to whether it is achievable or deliverable because when things are spread so far and wide, little can be achieved because there is no proper focus.

To make Southall a more balanced retail shopping place. Southall no longer has any of the main retail supermarkets. Lidl left in 2023. Pound Land left also. In March 2024 the main Southall crown post office was closed on the Broadway. It is incumbent upon the council to carry out a detailed consultancy investigative report as to why Southall cannot attract a main retailer supermarket.

People and in particular elderly people get on the 207 bus and go to the next town in Hanwell to go to Lidl. At the same time the council want to make a 20 minute town where we can all walk or cycle for our basic services. The council should be approaching local businesses to find out how they are faring in the current cost of living crisis. Southall businesses have shown to be resilient over the past 50 years, but the shopping high street is or has entered a difficult period. What policy do Council have to address these issues and particularly since there is no Chambers of Commerce as the Council never allowed them to return to the Southall Manor House and the organisation died a quiet death.

The Council should take steps to engage both businesses and residents to find a way forward on how to achieve high street / town centre improvements. The council should positively support residents and businesses to form groups of their own with direct links to council officers to help make positive and achievable plans for improvements.

In 2005 to about 2010 the council officers were engaging local businesses and residents. They engaged a great deal on various aspects of the early plans that they had for improving the public realm, shopfronts etc. It made a positive difference and there were good outcomes. Nothing will really happen unless the council engages positively and fully with the residents and businesses. It cannot happen by simply writing a policy which will just sit there. A policy cannot be put into action unless you have residents and businesses to work with directly.

Local people like me/us have detailed knowledge and understanding of our town and shops. Broadway provides very little for ordinary local folk and we all have to leave Southall to do our main shopping. Unless this is addressed by the council, their 20 minute town policy will never work.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I do not think I have the relevant skill set to make any alternative suggestions except to re-examine Policy S2 to make it more digestible and something people can understand rather than just paragraph after paragraph of words.

I would suggest that there should be more consultation with local people who are genuinely interested in the better development of Southall as a good place to live and proud to call your hometown. It is no good for the council to just consult with their own funded organisations. The truth is that we need residents groups who really care about doing something for their town.

When the council consults with its own funded organisations such as the Southall Community Alliance (for voluntary organisations and care homes) all "Let's go Southall" or "Let's get Southall Moving" or just the faith communities who keep close links with their Southall councillors at their faith buildings, then in these situations the council is effectively disassociating itself from the majority of the businesses and residents and that is why there is little positive engagement with the council.

There are residents and businesses who would like to work with the council to improve the town and its facilities and outlook. But the council need to instigate it and also allow these groups a place to meet (funded by the council) by letting us use our own Southall Manor House building Rather than keeping it empty mostly and locked up.

I can see there is a sense of criticism here and it is not helpful. But to put it bluntly the council needs to engage with businesses and residents because without us on board little can be achieved by the council on its own and it's chosen few organisations.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

It is important to inform this process, the council and the local plan of how, whatever changes have taken place are perceived by those of us who live and work here and thereby help to have a new local plan that is workable. The process is important since as residents we are being consulted.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Part B – Please use a separate sheet for each representation 10

Name or Organisation: XXXXXXXXXX

3. To which part of the Local Plan does this representation relate?

Paragraph Policy **Southall S3** Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	NO
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Local Plans should comply with higher level policies including the NPPF and the London Plan. The NPPF says

The development plan must include strategic policies to address each local planning authority’s priorities for the development and use of land in its area.

Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment

SOUTHALL Policy S2: King Street

Policy S3: King Street Neighbourhood

To enhance the vitality and viability of the King Street Neighbourhood Centre by:

- (i) Strengthening and diversifying the commercial core through parade intensification, active frontages, promoting mixed uses, greening, public realm interventions, and enhancing public squares outside the Manor House and Sri Ram Square.
- (ii) Expanding the King Street Neighbourhood Centre, west of The Green, to encompass new retail, food and beverage, and employment uses (at The Green), alongside public realm improvements and a high-quality pedestrian environment linking to public and green spaces.
- (iii) Creating a cultural and community use cluster centred around the Dominion Centre, Southall Manor House and Manor House Grounds to help increase footfall and a more diverse town centre.
- (iv) Enabling King Street Neighbourhood Centre to complement and connect with Southall Major Centre through sensitive consolidation of frontages and vertical extensions to increase capacity and enhance the character of the area.
- (v) Taking active measures to secure the future repair, reuse, and long-term survival of heritage assets and prominent buildings in the neighbourhood centre including The Manor House, The Green (GII*) and adjoining Manor House Grounds/Gardens, St Anselm's RC Church, The Green, and St John's Old Church, King Street (Local Heritage Asset).

The Southall King Street area has a character of its own. Old Southall has a character worth saving. Read the OAPF 2014. That framework showed empathy with the development of the town. What the council is doing is not something that the people of Southall ever wanted for King Street and surrounds. The OAPF 2014 has been in place, in reality for more than 10 years. However positive interest was shown in this neighbourhood from about 2005 onwards. Council engaged with the businesses and the residents and although people would still get frustrated with the council, things were never this bad.

The words all sound so great and positive and the impression given is very different from what is being achieved on the ground. Progress is too slow. Construction too fast and what started out as "regeneration" feels more like "degeneration" since it all started during Covid locked down and just after that. The various projects detailed above, generally cannot be seen as being achieved. Each numbered paragraph needs careful examination in order to address whether they meet the basic requirements of complying with higher level policies including the NPPF and the London Plan as set out at the start of this Box 5.

An ordinary layperson does not have the skills and expertise to make useful and critical friend comments. But, we can say things about what we can see happening on the ground. In that respect we do not see much progress here in Southall. The planning Inspector is requested to interrogate this detailed description and make judgements as to whether it is achievable or deliverable because when things are spread so far and wide, little can be achieved because there is no proper focus.

King Street, The Green and all that part of Southall's close to my heart. It was the focus point of the CPO public enquiry. The council breached the OAPF and instead of having developments of no more than six – eight storeys height, they engaged with developers and started investigating how to bring about a forced compulsory purchase order on unsuspecting property owners and businesses.

Please take the time to read my 49 page letter of representation is dated 28 September 2022 (attached “MD A”) regarding the CPO public enquiry held in October 2022. The representations were not so strong for making a difference to the CPO. I did not have the skill or expertise to really ward off the CPO, however it turned out to be a good opportunity for the council to receive detailed representations on behalf of people from Southall. The planning office at Ealing are familiar with that letter which also details the true character and buildings in that area. This local plan consultation gives the perfect opportunity to re—present several of the matters stated in my letter of representations 28/09/22.

The public realm at King Street is in a terrible condition. That is to say the pavements are in a terrible condition and even unsafe because of the gradient at which it drops down from the shop to the kerbside. They are also unsuitable for people with difficulties in walking, wheelchair users, elderly, visually impaired etc. the council needs to start engaging in detailed consultation with shopkeepers and residents who are willing to give the council their time to help achieve better outcomes for the King Street Neighbourhood.

The council should be approaching local businesses to find out how they are faring in the current cost of living crisis. Southall businesses have shown to be resilient over the past 50 years, but the shopping high street is or has entered a difficult period. What policy does the Council have to address these issues and particularly since there is no Chambers of Commerce as the Council never allowed them to return to the Southall Manor House and the organisation died a quiet death.

Southall Manor House has been in a “situation” with some kind of leaseback to a workspace organisation (as informed in the Southall Reset papers (attached “MD C”) and Appendix 5 document). Southall Manor House was gifted to the people of Southall and should be allowed to be used by voluntary residents groups so that they can organise themselves and play their part in civic duties.

This is all very important since the council removed Ward Forum meetings throughout the borough. Just when people started attending Ward Forum meetings more frequently, 2018 onwards and started raising more concerns about planning permissions and developments, the council stepped in to stop the Ward Forum meetings. In the Southall Reset papers in July 2022 the council informed the London Mayor that the Borough would have Town Forum Meetings. Nobody knows how they work and they were possibly introduced at the start of this year. The councillors liaison officer at the council (who used to run all the Ward Forum meetings and who has all the contact details of the residents to call them to meetings) never contacted any of the residents to come forward and attend any Town Forum meeting.

The council has not been engaging with the businesses and residents for a number of years. We can explain issues to our councillors in relation to the onslaught of development or things are not being improved e.g in the King Street Neighbourhood, but our councillors cannot take the issues any further because it goes against the leadership of the council. The party whip system operates in favour of the one-party system in London Borough of Ealing. In the circumstances our councillors are no longer in a position to help us forward any of our concerns as residents or businesses.

The Council should take steps to engage both businesses and residents to find a way forward on how to achieve high street / town centre/ King Street Neighbourhood improvements. The council should positively support residents and businesses to form groups of their own with direct links to council officers to help make positive and achievable plans for improvements.

In 2005 to about 2010 the council officers were engaging local businesses and residents. They engaged a great deal on various aspects of the early plans that they had for improving the public realm, Southall Big Plan , Southall Streets, shopfronts etc. it was all a part of the consultation under OAPF. It made a positive difference and there were good outcomes. The permanent traffic congestion on Southall Broadway was finally resolved. However now we have human traffic congestion on the pavements in Southall Broadway!

Nothing will really happen unless the Council engages positively and fully with the residents and businesses. It cannot happen by simply writing a policy which will just sit there. Otherwise it's just a paper exercise. A policy cannot be put into action unless you have residents and businesses to work with directly and they are all on board.

There is the OAPF which is still valid. It needs to be reviewed to see what has worked and what has not. But it appears that the council has no plans of reviewing this planning framework. The council cannot simply write to the London Mayor and declare it to be no longer "fit for purpose" (attached "MD B") . The King Street neighbourhood people relied on the OAPF to protect the character of their town.

- How was it ever possible for Ealing Council to collaborate with private developers to investigate the market and surreptitiously arrange for surveys to engage business owners to find out how much they were willing to sell their properties for on The Green , car repair workshops adjacent to St Anselm's church behind Tudor Rose ?
- How was it possible for Ealing Council to leave the Tudor Rose building out of the CPO that was hurriedly signed off by a one man Good Growth Committee?
- How was it ever possible to breach the provisions and design guidelines of OAPF?
- How was it possible to pass planning permissions (215058FUL) for something that was described as three blocks, initially of 10 storeys height to be situated at the back of the shops on The Green and develop on the main community car park (Featherstone Terrace/Dominion car park) that serves all the faith buildings in the centre of King Street neighbourhood?
- How was it possible that the development which was described as "three blocks", actually turned out to be one block of four separate towers?
- It was not until we actually attended the first day of the CPO enquiry that we learnt that Peabody intended to place one tower block in each corner of the car park and on that basis it was described as "one block". In the end there was going to be seven high-rise blocks with ? 19 storey buildings? How did all that fiasco happen?
- Why couldn't we rely on our council planning officers to follow the OAPF when properly and legitimately considering developments?

That experience of the people in The Green / King Street neighbourhood and the ensuing CPO public inquiry shattered their confidence in dealing with the council? Why can't we rely on any of our councillors to come forward and help their constituents to deal with any planning / development situation.

Initially the challenge was the CPO The Green 2021 that had been imposed on property owners. It was only after reading many planning, development documents, SPDs , SPGs and the OAPF that it became clear there was a string of breaches of planning rules, principles, protocols as well as specific guidelines or guidelines which were being interpreted very loosely. CPO The Green was confirmed nonetheless, but delayed because of the public inquiry. The property / business owners don't know what is actually happening. Their properties are blighted. But one has to ask the

question is this the reason why the OAPF is being discarded by the council so that they can ultimately go ahead with a development of 18 storey buildings on the Southall Development Site marked “10SO”.

What I’ve stated here still warrants internal investigation. It’s not relevant to the Reg 19 local plan , so apologies for wasting valuable time. But, what if it is relevant when taking into account all matters and considering whether this Reg 19 local plan is so flawed or has so many defects that it really must go back to the drawing board.

OAPF 2014 protected the King Street neighbourhood. The OAPF must not be discarded without a proper review and testing which provisions were too weak to stop tower blocks coming onto a traditional high street and aggressively dominating over the war memorial and the 16th century Southall Manor House and gardens. What happened in the King Street neighbourhood in 2021/2022 was a public outcry. A development of seven blocks of high-rise/towers was about to go up in blatant breach of OAPF , because I believe politics was stronger than our planning system.

People of Southall want to see improvements. They are still happy to engage the council to bring about much-needed improvements in the King Street neighbourhood.

Local people like me/us have detailed knowledge and understanding of our town and shops. King Street provides basics for some local folk , but we all have to leave Southall to do our main shopping. Unless this is addressed by the council, their 20 minute town policy will never work.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I do not think I have the relevant skill set to make any alternative suggestions except to re-examine Policy S3 to make it more digestible and something people can understand rather than just paragraph after paragraph of words.

I would suggest that there should be more consultation with local people who are genuinely interested in the better development of Southall as a good place to live and proud to call your hometown. It is no good for the council to just consult with their own funded organisations. The truth is that we need residents groups who really care about doing something for their town.

When the council consults with its own funded organisations such as the Southall Community Alliance (for voluntary organisations and care homes) or “Let’s go Southall” or “Let’s get Southall Moving” or just the faith communities who keep close links with their Southall councillors at their faith buildings, then in these situations the

council is effectively disassociating itself from the majority of the businesses and residents and that is why there is little positive engagement with the council and very little progress was improvement in the King Street Neighbourhood.

There are residents and businesses who would like to work with the council to improve the town and its facilities and outlook. But the council need to instigate it and also allow these groups a place to meet (funded by the council) by letting us use our own Southall Manor House building Rather than keeping it empty mostly and locked up.

I can see there is a sense of criticism here and it is not helpful. But to put it bluntly the council needs to engage with businesses and residents because without us on board little can be achieved by the council on its own and it's chosen few organisations.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

It is important to inform this process, the council and the local plan of how, whatever changes have taken place are perceived by those of us who live and work here and thereby help to have a new local plan that is workable.

The process is important since as residents we are being consulted. The OAPF must be retained or reviewed fully and then consider options.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Part B – Please use a separate sheet for each representation 11

Name or Organisation: XXXXXXXXXX

3. To which part of the Local Plan does this representation relate?

Paragraph Policy **Southall S4
WEST
SOUTHALL** Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
click4.(2) Sound	Yes	<input type="text"/>	No	NO
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Local Plans should comply with higher level policies including the NPPF and the London Plan. The NPPF says

The development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area.

Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for:

a) housing (including affordable housing), employment, retail, leisure and other commercial development;

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure); and

d) conservation and enhancement of the natural, built and historic environment

Policy S4:

To ensure effective delivery of a new neighbourhood on the Southall Green Quarter site over the plan period, ensuring that any future development includes:

- (i) Extending and complementing Southall Major Centre through a range of commercial, retail, community, leisure and cultural uses to strengthen its role as a Major Centre.
- (ii) Improving bus and active travel measures to increase permeability and enhancing the public realm between the site, the town centre, Southall Station, and the Grand Union Canal including upgraded canal towpaths.
- (iii) Providing a connected network of high quality green and open spaces to address deficiencies in the area.
- (iv) Providing social and community infrastructure, including a new primary school, indoor sports hall, community buildings, and a health centre.
- (v) Providing a significant proportion of genuinely affordable housing and other tenures/types to meet local needs.
- (vi) Delivering an extension to the Southall Major Centre that allow a more diversified retail offer with new cultural, leisure and employment opportunities.
- (vii) Given the long term development programme for the site, explore meanwhile uses opportunities on that site that would be complementary to the future placemaking ambitions for the West Southall.

Read the OAPF 2014. That framework showed empathy with the development of the town. The OAPF 2014 has been in place, in reality for more than 10 years. The council are not engaging with people of southall.

The words all sound so great and positive and the impression given is very different from what is being achieved on the ground. Progress is too slow. Construction too fast and what started out as “regeneration” feels more like “degeneration”. The various projects detailed above, generally cannot be seen as being achieved. Each numbered paragraph needs careful examination in order to address whether they meet the basic requirements of complying with higher level policies including the NPPF and the London Plan as set out at the start of this Box 5.

An ordinary layperson does not have the skills and expertise to make useful and critical friend comments. But, we can say things about what we can see happening on the ground. In that respect we do not see much progress here in Southall. The planning Inspector is requested to interrogate this detailed description and make judgements as to whether it is achievable.

Please take the time to read my 49 page letter of representation is dated 28 September 2022 (attached “MD A”) regarding the CPO public enquiry held in October 2022. The representations were not so strong for making a difference to the CPO. I did not have

the skill or expertise to really ward off the CPO, however it turned out to be a good opportunity for the council to receive detailed representations on behalf of people from Southall. The planning office at Ealing are familiar with that letter which also details the true character and buildings in that area. This local plan consultation gives the perfect opportunity to re—present several of the matters stated in my letter of representations 28/09/22.

The council should be approaching local businesses to find out how they are faring in the current cost of living crisis. Southall businesses have shown to be resilient over the past 50 years, but the shopping high street is or has entered a difficult period. What policy does the Council have to address these issues and particularly since there is no Chambers of Commerce as the Council never allowed them to return to the Southall Manor House and the organisation died a quiet death.

This is all very important since the council removed Ward Forum meetings throughout the borough. Just when people started attending Ward Forum meetings more frequently, 2018 onwards and started raising more concerns about planning permissions and developments, the council stepped in stop the Ward Forum meetings. In the Southall Reset papers in July 2022 the council informed the London Mayor that the Borough would have Town Forum Meetings. Nobody knows how they work and they were possibly introduced at the start of this year. The councillors liaison officer at the council (who used to run all the Ward Forum meetings and who has all the contact details of the residents to call them to meetings) never contacted any of the residents to come forward and attend any Town Forum meeting.

The council has not been engaging with the businesses and residents for a number of years. We can explain issues to our councillors in relation to the onslaught of development or things are not being improved , but our councillors cannot take the issues any further because it goes against the leadership of the council. The party whip system operates in favour of the one-party system in London Borough of Ealing. In the circumstances our councillors are no longer in a position to help us forward any of our concerns as residents or businesses.

The Council should take steps to engage both businesses and residents to find a way forward. The council should positively support residents and businesses to form groups of their own with direct links to council officers to help make positive and achievable plans for improvements.

Nothing will really happen unless the Council engages positively and fully with the residents and businesses. It cannot happen by simply writing a policy which will just sit there. Otherwise it's just a paper exercise. A policy cannot be put into action unless you have residents and businesses to work with directly and they are all on board.

There is the OAPF which is still valid. It needs to be reviewed to see what has worked and what has not. But it appears that the council has no plans to review this planning framework. The council cannot simply write to the London Mayor and declare it to be no longer “fit for purpose” (attached “MD B”).

People of Southall want to see improvements. They are still happy to engage the council to bring about much-needed improvements in the shopping areas.

Local people like me/us have detailed knowledge and understanding of our town and shops. But, we all have to leave Southall to do our main shopping. Unless this is addressed by the council, their 20 minute town policy will never work.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I do not think I have the relevant skill set to make any alternative suggestions except to re-examine Policy S4 to make it more digestible and something people can understand rather than just paragraph after paragraph of words.

I would suggest that there should be more consultation with local people who are genuinely interested in the better development of Southall as a good place to live and proud to call your hometown. It is no good for the council to just consult with their own funded organisations. The truth is that we need residents groups who really care about doing something for their town.

When the council consults with its own funded organisations such as the Southall Community Alliance (for voluntary organisations and care homes) or "Let's go Southall" or "Let's get Southall Moving" or just the faith communities who keep close links with their Southall councillors at their faith buildings, then in these situations the council is effectively disassociating itself from the majority of the businesses and residents and that is why there is little positive engagement with the council and very little progress being made.

There are residents and businesses who would like to work with the council to improve the town and its facilities and outlook. But the council need to instigate it and also allow these groups a place to meet (funded by the council) by letting us use our own Southall Manor House building rather than keeping it empty mostly and locked up.

I can see there is a sense of criticism here and it is not helpful. But to put it bluntly the council needs to engage with businesses and residents because without us on board little can be achieved by the council on its own and it's chosen few organisations.

(Continue on a separate sheet /expand box if necessary)

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes

Yes, I wish to participate in hearing session(s)

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It is important to inform this process, the council and the local plan of how, whatever changes have taken place are perceived by those of us who live and work here and thereby help to have a new local plan that is workable. The process is important since as residents we are being consulted. The OAPF must be retained or reviewed fully and then consider options.

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Part B – Please use a separate sheet for each representation 12

Name or Organisation: XXXXXXXXXX

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	Southall S5 EAST SOUTHALL	Policies Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes		No	
click4.(2) Sound	Yes		No	NO
4 (3) Complies with the Duty to co-operate	Yes		No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Local Plans should comply with higher level policies including the NPPF and the London Plan. The NPPF says

The development plan must include strategic policies to address each local planning authority’s priorities for the development and use of land in its area.

Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment

S5 East Southall
SOUTHALL Policy S5:

Policy S5: East Southall

To ensure effective delivery of development of a new neighbourhood ensuring that any future development includes:

- (i) Providing a mixed-use development of residential, employment, convenience retail, community, and canalside leisure uses, with active frontages and commercial uses at ground floor and first floor levels, where appropriate.
- (ii) Enhancing the canalside character and industrial heritage of the area by retaining and enhancing the setting of the Sunrise Radio building and adjacent locally listed facades.
- (iii) Providing a connected network of new green and open spaces to address deficiencies in the area including a new square, linear park or naturalised edges for SuDs and improving access to Glade Lane Park and boundary treatment of Hortus Cemetery.
- (iv) Providing a range of unit sizes to support local needs including small and medium enterprises, and high-quality jobs.
- (v) Adding Charles House to the Bridge Road Industrial Estate LSIS and ensuring that future development and access arrangements are properly integrated.
- (vi) Ensuring that the proposed east-west active travel and public transport route, Healum Avenue, is delivered in full to connect Havelock Estate to Merrick Road and connects with the Merrick Road footbridge.
- (vii) Improving active travel measures, canal tow paths and enhancing the public realm between Merrick Road and the Grand Union Canal through the site.
- (viii) Providing a significant proportion of genuinely affordable housing and other tenures/types to meet local needs.
- (ix) Providing community infrastructure including safeguarded land for a new primary school.

Read the OAPF 2014. That framework showed empathy with the development of the town. The OAPF 2014 has been in place, in reality for more than 10 years. The council are not engaging with people of southall.

The words all sound so great and positive and the impression given is very different from what is being achieved on the ground. Progress is too slow. Construction too fast and what started out as “regeneration” feels more like “degeneration”. The various projects detailed above, generally cannot be seen as being achieved. Each numbered paragraph needs careful examination in order to address whether they meet the basic requirements of complying with higher level policies including the NPPF and the London Plan as set out at the start of this Box 5.

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The council should be approaching local businesses to find out how they are faring in the current cost of living crisis. Southall businesses have shown to be resilient over the past 50 years, but the shopping high street is or has entered a difficult period. What policy does the Council have to address these issues and particularly since there is no Chambers of Commerce as the Council never allowed them to return to the Southall Manor House and the organisation died a quiet death.

This is all very important since the council removed Ward Forum meetings throughout the borough. Just when people started attending Ward Forum meetings more frequently, 2018 onwards and started raising more concerns about planning permissions and developments, the council stepped in stop the Ward Forum meetings. In the Southall Reset papers in July 2022 the council informed the London Mayor that the Borough would have Town Forum Meetings. Nobody knows how they work and they were possibly introduced at the start of this year. The councillors liaison officer at the council (who used to run all the Ward Forum meetings and who has all the contact details of the residents to call them to meetings) never contacted any of the residents to come forward and attend any Town Forum meeting.

The council has not been engaging with the businesses and residents for a number of years. We can explain issues to our councillors in relation to the onslaught of development or things are not being improved , but our councillors cannot take the issues any further because it goes against the leadership of the council. The party whip system operates in favour of the one-party system in London Borough of Ealing. In the circumstances our councillors are no longer in a position to help us forward any of our concerns as residents or businesses.

The Council should take steps to engage both businesses and residents to find a way forward. The council should positively support residents and businesses to form groups of their own with direct links to council officers to help make positive and achievable plans for improvements.

Nothing will really happen unless the Council engages positively and fully with the residents and businesses. It cannot happen by simply writing a policy which will just sit there. Otherwise it's just a paper exercise. A policy cannot be put into action unless you have residents and businesses to work with directly and they are all on board.

There is the OAPF which is still valid. It needs to be reviewed to see what has worked and what has not. But it appears that the council has no plans to review this planning framework. The council cannot simply write to the London Mayor and declare it to be no longer "fit for purpose" (attached "MD B") .

People of Southall want to see improvements. They are still happy to engage the council to bring about much-needed improvements in the shopping areas.

Local people like me/us have detailed knowledge and understanding of our town and shops. But, we all have to leave Southall to do our main shopping. Unless this is

addressed by the council, their 20 minute town policy will never work.

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I would suggest that there should be more consultation with local people who are genuinely interested in the better development of Southall as a good place to live and proud to call your hometown. It is no good for the council to just consult with their own funded organisations. The truth is that we need residents groups who really care about doing something for their town.

When the council consults with its own funded organisations such as the Southall Community Alliance (for voluntary organisations and care homes) or "Let's go Southall" or "Let's get Southall Moving" or just the faith communities who keep close links with their Southall councillors at their faith buildings, then in these situations the council is effectively disassociating itself from the majority of the businesses and residents and that is why there is little positive engagement with the council and very little progress being made.

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I can see there is a sense of criticism here and it is not helpful. But to put it bluntly the council needs to engage with businesses and residents because without us on board little can be achieved by the council on its own and it's chosen few organisations.

The people of Southall cannot tolerate any more tall buildings or high-rise blocks/towers. Tall buildings are defined as having a minimum of six storeys and without a maximum being stated,

although Southall the indication is 18 storeys in height. Although tall buildings is supposed to be the exception, it appears the plan as the norm and it is worrying.

Southall people never agreed to high-rise blocks and towers. The policy has been changed somewhere without any consultation. This objection relating to Tall buildings, high-rise is felt all over the town and the objections relate to all of the five policies (S1, S2, S3, S4 and S5). We all object to these tall buildings towering above us

aggressively in a town which is traditionally dense low urban build. The only space Southall ever had was the sky and we all strongly object to such tall towers which were never envisaged when the OAPF and the gasworks site was first consulted upon.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes

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Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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It is important to inform this process, the council and the local plan of how, whatever changes have taken place are perceived by those of us who live and work here and thereby help to have a new local plan that is workable.

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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Part B – Please use a separate sheet for each representation 13

Name or Organisation: XXXXXXXXXX

3. To which part of the Local Plan does this representation relate?

Paragraph	<input style="width: 100%; height: 100%;" type="text"/>	Policy	Southall Ealing Consultation & Responses	Policies Map	<input style="width: 100%; height: 100%;" type="text"/>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input style="width: 100%; height: 20px;" type="text"/>	No	NO
click4.(2) Sound	Yes	<input style="width: 100%; height: 20px;" type="text"/>	No	NO
4 (3) Complies with the Duty to co-operate	Yes	<input style="width: 100%; height: 20px;" type="text"/>	No	<input style="width: 100%; height: 20px;" type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Appendix C is somehow supposed to be a summary and a response by Ealing Council to representations (about 6000 or 10,000) in relation to the local plan . Unprecedented numbers of representations have been made by people throughout the borough and Southall in particular. Even I don't know when Ealing refers to whatever consultation numbers they have access to. I do get the impression that all of the responses have not been properly analysed. It may be that the council is referring to 10,000 responses to the Shaping Ealing / Shaping Southall surveys that were conducted (which I now know) between about November 2020 and May 2021. Perhaps I am confused. But after reading all of the documentation I have a better understanding through all the confusion of how the council has been conducting consultations and surveys, left right and centre, but never really engaging people. I don't make this criticism lightly.

Appendix C cannot possibly be a proper summary of the 10,000 responses at shaping Ealing / shaping Southall stage all 6000 responses made in February 2024 Reg 18 stage. The planning inspector should be interested to learn how 6000/10,000 responses were collated, considered , organised , weighed subject by subject so that the council could give a true and better reflection after considering such extensive responses from right across the borough.

The most important question is how come the council ever received an unprecedented 10000 responses (1000 from Southall) to the Shaping Ealing survey or unprecedented 6000 responses to a local plan that had been drafted already by the council at Reg 18 and published in November 2023? The council has said that they are “a victim of their own success” , because they have been so good at reaching out for consultation processes and that is why there was such a huge response, because they had

extensively consulted the people in the borough. That is a prejudiced , loaded, personal view of a council serving its own purpose support their own view that they have carried out proper and extensive (which Southall people do not accept) consultations. In the view of Southall people, and probably the whole borough engagement by Ealing Council's (over the years) least inclusive.

The unprecedented responses received (10,000/6000 /13,000) the figures having been given by council themselves (in meetings) cannot be viewed simply as a success result of consultations feeding into Reg 18 local plan. In my experience in a lifetime of working and living in the borough and being a civic minded person, when people partake in surveys, petitions, gatherings, meetings etc. it is because they want to be heard about something that they feel strongly about. And when they feel very strong about things it is usually unhappy feelings that they want to express and especially to organisations in a position of authority. The council itself confirmed that they were shocked to receive about 1000 responses to Shaping Southall and learn the criticisms made by the Southall people. The council itself confirmed that Southall people had never before engaged in such high numbers. The truth is that Southall people were so unhappy that they were compelled to engage in the survey k/a Shaping Southall. But what did the people of Southall know that this survey would be feeding into a far more complicated local authority procedure progressing under statutory procedures to create a new local plan for the whole borough? In ordinary people's view that survey was simply a survey where the council decided to take the temperature of an area called Southall which is very sick with the level of overdevelopment and lack of involvement in their own environment.

Southall is planning/development situation only came to my attention because of the compulsory purchase order made in relation to the high-rise developments planned by the council (the Green Southall – development sites 10SO (SO13) in a situation where there had been no consultation with the Southall people whatsoever. The issue of the CPO came to my attention by chance in December 2020 and it was at a time when I was completely unaware that the council was preparing for anything called shaping Ealing/shaping Southall surveys , regulation 18 draft local plan, regulation 19 working towards a new local plan for the borough.

I immediately engaged in January 2022 to offer a public enquiry into the CPO relating to the Green Southall (development site 10SO). I became heavily involved in reading many documents and committee papers and appendices, anything relating to developments and planning in Southall. I was struggling to learn how the CPO in 10SO could ever have happened without people like me/us ever knowing about it. All the property owners who were affected had very little knowledge about what was going on and what procedures the council was following. The council had engaged private chartered surveys and people to somehow enter into private negotiations for private sale and then somehow swooped in with a CPO with the help of private firms of chartered surveyors and developers. My criticisms may seem harsh, but we in Southall were absolutely shocked by what was going on in The Green which is part of the so-called King Street neighbourhood , what we also referred to as Old Southall.

My purpose in referring to my experience is to express very strongly that despite my heavy involvement in the CPO matter throughout 2022 (the public enquiry was in October 2022) , I never came across anything called shaping Ealing/shaping Southall survey until I attended a meeting at the Southall Community Alliance - SCA (at Southall town Hall) on or about 22nd of July 2022. At that meeting the council's liaison local plan officer gave a presentation. SCA is an organisation in Southall which claims to represent all the voluntary organisations. It does not claim to represent the residents or businesses of Southall. I was invited to attend the meeting because I was

involved in dealing with the CPO as a private resident. The people who attended the presentation by Ealing Council on 22nd of July 2022 (at SCA) were perhaps 10 in number. They listened intently to the council officer about the results from the Southall Shaping survey. They were listening for the first time to the results of the survey and for some they were listening the first time to the fact that there had been a survey called “Shaping Southall” . We all expressed our concerns and dismay about the level of overdevelopment and that people very unhappy. We were given the results of that survey and we were told that it was important to engage in the local plan processes so that we could make a difference and be heard. It was represented as if we should all now engage in the local plan in order to make a real difference to the new local plan that the council were working on and promised to make improvements in Southall.

It is most concerning just how disjointed the whole process has been. I see now that Southall’s response of 1000 to the Shaping Southall Survey, had already according to the council started feeding into a regulatory process as at May 2021. But at the same time on 21 May 2021 the leader of the council sent a letter to the London Mayor ready to abandon the 2014 OAPF South Road bridge widening scheme. It would seem that the Council had already created a “Southall Reset” policy at that point. But most importantly, without consulting people of Southall. There were no real consultation processes that any of us were aware of. For more than a year (May 2021 to July 2022 the council presentation at the SCA) I was ignorant about anything called Shaping Southall. But so were the great many people in Southall.

We used to attend our Ward Forum meetings and they all stopped by January 2020. Consequently , any relationship that we had with elected councillors have been brought to an end. Had we had Ward meetings, our councillors no doubt would have ensured that we understand the importance of Shaping Southall Survey. But, would our councillors have known that the leader of the council had submitted a letter dated 21st of May 2021 re. Southall Reset and abandonment of OAPF and the South Road bridge widening infrastructure which supported the green quarter (11SO). At that point who engaged in consultations from Southall with the council? Is that in the evidence base to the Reg.19. It is apparent that big decisions were made in relation to Southall without the involvement of residents and businesses. In this sense the process Reg 18 / Reg 19 is disjointed and things don’t add up. Not until, we really start examining documents and papers and dates and not forgetting that we were all suffering under the pressures of Covid in November 2020, January 2021, May 2021 and ordinary people throughout the country were very carefully venturing out of their homes and going about their business and jobs trying to achieve some normality. Behaviours and illnesses relating to Covid was still heavily affecting Southall up to about February 2022. I recall clearly that people were beginning to come out and engage more in spring / March 2022 and in May 2022 there were the local council elections. My purpose in mapping this is to demonstrate, that’s what over consultations Ealing Council was engaged with , it was most likely with their chosen few groups like SCA and “Let’s Go Southall” who are closely connected anyway. These two groups are closely linked and are funded by Ealing Council. Both groups advocate and support the cycling policy being imposed on Southall people, which it must be said again that Southall people do not want. Ultimately the reason why Southall people responded in such large numbers to the Shaping Southall survey , is because they needed to be heard about the many things that they are deeply unhappy about in relation to Ealing Council’s plans for Southall , towers/tall buildings, imposition of cycle lanes where people do not cycle for very good reasons , floating bus stops that cause serious traffic problems, overdevelopment etc.

I have tried my best to explain how I believe the council has done things back to front and how the Reg. 18 local plan was not the result of proper consultations. How the council were busy drafting change in strategy relating to planning matters , abandoning the OAPF,a framework that had been heavily consulted upon and negotiated over a period of 10 years culminating in final approval in 2014.

Please take the time to read my 49 page letter of representation is dated 28 September 2022 (attached "MD A") regarding the CPO public enquiry held in October 2022. The representations (made in October 2022) were known the council. If the council were busy noting what Southall people had to say, did they take on board the matters stated in detail in the letter dated 28/9/22 ? The planning team at Ealing are familiar with that letter which also details the true character and buildings in that area. This local plan Reg 18 gave the perfect opportunity to re—present several of the matters stated in my letter of representations 28/09/22.

This is all very important since the council removed Ward Forum meetings throughout the borough. Just when people started attending Ward Forum meetings more frequently, 2018 onwards and started raising more concerns about planning permissions and developments, the council stepped in stop the Ward Forum meetings. In the Southall Reset papers in July 2022 the council informed the London Mayor that the Borough would have Town Forum Meetings. Nobody knows how they work and they were possibly introduced at the start of this year. The councillors liaison officer at the council (who used to run all the Ward Forum meetings and who has all the contact details of the residents to call them to meetings) never contacted any of the residents to come forward and attend any Town Forum meeting. There have been no proper consultations with the people in the borough and in particular Southall. the council have not provided a list of the main organisations with touch with whom they consulted at any point starting from August 2020. How many residents associations or resident groups who are involved in managing their blocks of flats in Southall? how many of them were consulted? Was the Indian Workers Association consulted who are situated on The Green in the heart of the King Street neighbourhood Development Site 10SO?

There is no evidence of which groups organisations stated what concerns and from which people, groups or communities in Southall.

It is difficult to comprehend how 6000 or 10,000 responses are summarised in just the document at Appendix C.

The council has not been engaging with the businesses and residents for a number of years. We can explain issues to our councillors in relation to the onslaught of development or things are not being improved , but our councillors cannot take the issues any further because it goes against the leadership of the council. The party whip system operates in favour of the one-party system in London Borough of Ealing. In the circumstances our councillors are no longer in a position to help us forward any of our concerns as residents or businesses.

The Council should take steps to engage both businesses and residents to find a way forward. The council should positively support residents and businesses to form groups of their own with direct links to council officers to help make positive and achievable plans for improvements.

Nothing will really happen unless the Council engages positively and fully with the residents and businesses. It cannot happen by simply writing a policy which will just sit there. Otherwise it's just a paper exercise. A policy cannot be put into action unless you have residents and businesses to work with directly and they are all on board.

There is the OAPF which is still valid. It needs to be reviewed to see what has worked and what has not. But it appears that the council has no plans to review this planning framework. The council cannot simply write to the London Mayor and declare it to be no longer “fit for purpose” 21 /05/21 (attached “MD B”), even before the Shaping Southall survey responses had been analysed. It is now apparent that the council has been engaged in actions and practices which basically caters their own judgement in relation to dealing with the current matter of the Regulation 19 local plan.

People of Southall want to see improvements. They are still happy to engage the council to bring about much-needed improvements in the shopping areas.

Local people like me/us have detailed knowledge and understanding of our town and shops. But, we all have to leave Southall to do our main shopping. Unless this is addressed by the council, their 20 minute town policy will never work.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I would suggest that there should be more consultation with local people who are genuinely interested in the better development of Southall as a good place to live and proud to call your hometown. It is no good for the council to just consult with their own funded organisations. The truth is that we need residents groups who really care about doing something for their town.

When the council consults with its own funded organisations such as the Southall Community Alliance (for voluntary organisations and care homes) or “Let’s go Southall” or “Let’s get Southall Moving” or just the faith communities who keep close links with their Southall councillors at their faith buildings, then in these situations the council is effectively disassociating itself from the majority of the businesses and residents and that is why there is little positive engagement with the council and very little progress being made.

There are residents and businesses who would like to work with the council to improve the town and its facilities and outlook. But the council need to instigate it and also allow these groups a place to meet (funded by the council) by letting us use our own Southall Manor House building rather than keeping it empty mostly and locked up.

I can see there is a sense of criticism here and it is not helpful. But to put it bluntly the council needs to engage with businesses and residents because without us on board little can be achieved by the council on its own and it’s chosen few organisations. The people of Southall cannot tolerate any more tall buildings or high-rise blocks/towers. Tall buildings are defined as having a minimum of six storeys and

without a maximum being stated, although Southall the indication is 18 storeys in height. Although tall buildings is supposed to be the exception, it appears the plan as the norm and it is worrying.

Southall people never agreed to high-rise blocks and towers. The policy has been changed somewhere without any consultation.

This objection relating to Tall buildings, high-rise is felt all over the town and the objections relate to all of the five policies (S1, S2, S3, S4 and S5). We all object to these tall buildings towering above us aggressively in a town which is traditionally dense low urban build. The only space Southall ever had was the sky and we all strongly object to such tall towers which were never envisaged when the OAPF and the gasworks site was first consulted upon.

There is the OAPF which is still valid. It needs to be reviewed to see what has worked and what has not. But it appears that the council has no plans to review this planning framework. The council cannot simply write to the London Mayor and declare it to be no longer “fit for purpose” 21 /05/21 (attached “MD B”), even before the Shaping Southall survey responses had been analysed.

It is now apparent that the council has been engaged in actions and practices which basically fettered their proper exercise of powers proper exercise of own judgement in relation to dealing with the current matter of the Regulation 19 local plan and I can say that confidently for Southall because I have concentrated the most on this from Southall’s perspective.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

It is important to inform this process, the council and the local plan of how, whatever changes have taken place are perceived by those of us who live and work here and thereby help to have a new local plan that is workable.

This must be all expressed at the hearing.

The process is important since as residents we are being consulted. The OAPF must be retained or reviewed fully and then consider options.

Regulatory processes must be followed to the letter of the law or else there is no point in people wasting their time in the future in consultation processes which have ultimately proven to be a meaningless exercise that does not genuinely contribute to the development of a new local plan for the for the borough and especially for Southall. It's a whitewash and clear that the council is determined to aggressively pursue its policy of building new homes (and imposing it on Southall) and despite the fact figures and statistics relating to Southall's already densely built environment and densely populated area with a life long history of high poverty indicators. It is surely the worst place to build tall buildings/tower blocks because it has the potential for just existing on the edge of the borough as a ghetto. And that is something which is not sustainable as, just like the estates and blocks built in the last century had to be demolished.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.