Ealing's Authority Monitoring Report 2014/15-2018/19

(Interim Report)

www.ealing.gov.uk

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Contents

List of Tables & Figures

1. Introduction

Purpose of the Authority Monitoring Report (AMR)

The need to carry out monitoring is an important aspect of the plan making process, required by section 35 of the Planning and Compulsory Purchase Act 2004, as amended by section 113 of the Localism Act 2011. The AMR monitors the effectiveness and performance of the policies within the Council's existing Local Plan and acts as evidence for preparation of the Council's new Local Plan.

Whilst the AMR examines several key performance indicators directly linked to the performance of the policies in the Local Plan, it also provides an update on contextual planning changes that may have a bearing on the application and interpretation of policy performance. The analysis contained in this Interim Report AMR is both quantitative and qualitative.

The 2011 Localism Act also removed the requirement to publish/submit reports annually, which were previously known as *Annual* Monitoring Reports. Now renamed *Authority* Monitoring Reports, this is the Council's first AMR since September 2015, which covered the reporting year 2013/14.

Finally, this AMR is published as an 'Interim Report' as the data relating to housing policy is yet to be fully migrated from the Greater London Authority's (GLA) data source. A further AMR Final Report will therefore be published within the next six months, which will also include monitoring year 2019/20 and contain the Five Year Housing Land Supply and Trajectory.

For clarity of reading this document, hereafter this Interim Report AMR, will be known as the AMR.

Data sources

The AMR draws on a range of data sources, but the GLA's London Development Database (LDD) has been of central importance, specifically in respect of the reported 'development indicators'. Whilst operational the LDD was a "live" system monitoring planning permissions and their progress to completion. At the end of 2020, the GLA launched a replacement for the LDD, the Planning London DataHub. The new system will mean that data is harvested direct from planning applications, but as the central repository for information on proposed and coming development it serves the same function. Given the focus on past activity, this AMR principally draws from the LDD, but select inputs will also utilise the DataHub.

The GLA's new database (DataHub) has been designed as an open source platform, which allows the public to access data in real time. The DataHub is accessible from here: [The Planning London Datahub | London City Hall]

In addition to drawing from development data statistics, a number of other data sources have been employed for this AMR including: other GLA datasets, MHCLG published performance data, Environment Agency data, Ealing's Automated Energy Monitoring Platform, Ealing's Self and Custom Build Register, Planning Inspectorate appeal reports, departure statistics etc.

Finally, as this AMR will cover a number of years, the core data has been disaggregated and reported year by year and picks up from when the last AMR finished (2013/14). As such it is possible to single

out the results for any given year and where appropriate commentary/analysis extends over a longer timeframe. This has been particularly helpful in identifying trends over a longer period.

Reporting Period

Ealing Council last published an AMR in September 2015, covering the reporting year 2013/14. Despite the absence of a published AMR for the past 5 years, monitoring has been ongoing throughout this period and has been reported through other channels and formats, for example as part of national and regional reporting, all of which are in the public domain. Particularly relevant is the national annually reported Housing Delivery Test results, and the London Plan AMR reports. The most recent London AMR (no. 16) covers the period 2018/19 and was published in March 2021. Monitoring the London Plan | London City Hall.

It is important to note that comparing the results between this AMR and the London AMR, may result in some differences in the reported figures between the different outputs. This principally arises due to the timing of when the data was extracted for each respective output, as the LDD (and DataHub) are live systems that are continually updated and adjusted to reflect the best information available. Moreover, dependent on the source of publication and the intended purpose of the reported output, different definitions/methods may have been employed, and so it is key that the figures are not interpreted without full knowledge of these differences. Particular attention is drawn to the past residential completion figures displayed in the dashboard of the DataHub, which are substantially different from the figures reported in this report and the GLA's published AMRs. This principally arises because of changes the GLA has introduced to the method by which losses of existing units are accounted for when deriving a net figure for a reporting year. These matters are addressed in some detail in the main body of the report.

For the purpose of the Five Year Housing Land Supply and Housing Trajectory residential completion, data for 2019/20 is also intended to be used. It is necessary for this data to be collated offline outside of the LDD/DataHub, it is also currently limited to residential completions and is presently only available at an aggregated level. To be accurate, robust, and effective, the Five Year Housing Land Supply and the Housing Trajectory also needs to be informed by the latest approvals pipeline. Following the transition from the LDD to the DataHub, this pipeline data is pending migration.

Changes in reporting methods

Throughout the monitoring period covered by this AMR, extending beyond a five year period, there have also been number of significant changes in how data/targets are defined, collated, and reported. These are explained below.

Unlike past AMRs where reporting was carried out at a borough level, for this AMR the spatial/geographical extent of reporting varies based on the specific output/monitoring topic and the reporting year. This change in reporting arises because of the establishment of a Mayoral Development Corporation (known as the Old Oak and Park Royal Development Corporation or 'OPDC') in April 2015. The OPDC's demise covers the north east corner of the borough. Since this date, the Council's planning powers for that part of the borough have transferred to the OPDC. Whilst the Council still inputs monitoring information into the LDD/DataHub for delegated schemes (applications which the OPDC has delegated to Ealing LPA to determine), this does not represent the full borough position. Moreover, the OPDC are now responsible

for separately reporting on development progress within its own area, and it wouldn't be appropriate to duplicate this.

For the purposes of this AMR, it is therefore necessary to report both borough figures (including the OPDC demise) and LPA figures (excluding the OPDC demise) for select indicators.
Given the change in responsibilities, the following paragraphs explain the various reporting conventions for each of the reporting years.

For the reporting year 2014/15, which predates the establishment of the OPDC, the LPA and Borough figures were one and the same. Therefore, for the first reporting year, borough figures are reported for all outputs/chapters.

In relation to non-residential and open space development indicators, for the reporting years 2015/16, 2016/17, 2017/18 & 2018/19, the analysis and reporting utilises LPA data only. One exception has been made in relation to waste data, where data has been analysed at a borough level itself, reflecting the ongoing use of borough targets in the London Plan.

In respect of the housing chapter only, for the reporting years 2015/16, 2016/17, 2017/18 & 2018/19, both LPA and borough figures are given. Although beyond the Council's locus as an LPA, it was considered helpful to also report on borough figures as this information feeds into a number of corporate indicators which consider the borough as a whole.

For the five year land supply and the trajectory, borough figures are plugged into this for all reporting years up to the end of 2018/19. The reason borough figures are used here as distinct from the other chapters, is because the housing delivery targets (established through the London Plan) for these years are borough targets only. Given the need to publish an up to date Five Year Housing Land Supply and Trajectory, for these outputs only the latest 2019/20 completion data is also incorporated. As noted above however the housing pipeline dataset is incomplete, and the five year land supply and trajectory will be published in the Final Report AMR in due course. 2019/20 is also the first monitoring year under the new London Plan 2021 targets, which for the first time are based on the Council LPA area (omitting the OPDC demise), and so accordingly the data reported from this point onwards is LPA only.

Table 1.1 below attempts to summarise the spatial extent of reporting for different years and different thematic areas/outputs. This table also includes the date of when the dataset was generated from the LDD for the purpose of analysis.

Table 1.1 – Spatial extent of reporting by year and thematic area/output, and date of datasets employed

	2014/15[1]		2015/16		2016/17		2017/18		2018/19		2019/20[2]	
Chapter	**Borough**	**LPA**	**Borough**	**LPA**	**Borough**	**LPA**	**Borough**	**LPA**	**Borough**	**LPA**	**Borough**	**LPA**
2 Housing	Yes (June 20)	NA	Yes (June 20)	Yes (June 20)	Yes (June 20)	Yes (June 20)	Yes (June 20)	Yes (June 20)	Yes (June 20)	Yes (June 20)	NA	NA
Five Yr Land Supply & Trajectory	Yes (June 20)	NA	Yes (June 20)	No	Yes (June 20)	No	Yes (June 20)	No	Yes (June 20)	No	No	Yes (Nov 20)
3 Business	Yes (March 19)	NA	No	Yes (March 19)	No	Yes (March 19)	No	Yes (March 19)	No	Yes (June 20)	NA	NA
4 Town Centre	Yes (March 19)	NA	No	Yes (March 19)	No	Yes (March 19)	No	Yes (March 19)	No	Yes (June 20)	NA	NA
5 Social Infrastructure	Yes (March 19)	NA	No	Yes (March 19)	No	Yes (March 19)	No	Yes (March 19)	No	Yes (June 20)	NA	NA
6 Green Space	Yes (March 19)	NA	No	Yes (March 19)	No	Yes (March 19)	No	Yes (March 19)	No	Yes (June 20)	NA	NA
7 Climate Change	Yes (March 19)	NA	No	Yes (March 19)	No	Yes (March 19)	No	Yes (March 19)	No	Yes (June 20)	NA	NA
Waste	Yes (March 19)	NA	Yes (March 19)	No	Yes (March 19)	No	Yes (March 19)	No	Yes (March 19)	No	NA	NA

Notes:
[1] For the first year of reporting (2014/25) only, the Borough and LPA data is identical, as this predates the establishment of the OPDC.
[2]This is the first monitoring year under the emerging New London Plan in respect of the housing delivery targets. For the first time since 2015, this delivery target now correctly relates to the Ealing LPA area.

Beyond the changes arising in respect of spatial reporting, interpreting the performance measures is also complicated by using different methodologies, definitions and targets for the same measures but employed for different outputs. Notably MHCLG/LUHC and the GLA frequently employ different targets/inputs/tailored definitions for a given year. This complexity is perhaps amplified by the duration of the reporting period covered in this AMR. Accordingly, it is not always possible to make direct comparisons of the data from year to year. To assist with interpreting the results, the AMR sets out in some detail these differences and provides a guide around their application.

Structure of report

Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out what information the AMR must contain, which is reflected through the content of the report.

Ealing's previous AMRs have been split into separate reports (Monitors). It is intended that this AMR will principally cover Monitor 3 'Authority/Borough Wide Development Monitoring'. Monitor 1, the project plan/Local Development Scheme, will be published independently. A separate monitor and chapter monitoring planning obligations is no longer necessary as the detail on this will now sit in the Infrastructure Funding Statement (IFS), which is being prepared separately.

This report is organised thematically into six sub sections as follows:

- Chapter 2 provides authority/borough wide performance information on **Housing** matters. It sets the context for the need and supply based targets, and examines delivery over the period, including in relation to affordable housing and accessible housing. It sets the context for examining future capacity and anticipated delivery through the 5 year land supply and housing trajectory, but the final outputs of each are omitted from this version.

- Chapter 3 **Business** provides commentary on business development activity in the authority. An analysis is provided in relation to changes in employment floorspace, land use and designation. A review of relevant appeal and departure decisions is also included.

- Chapter 4 on **Town Centres** provides an overview of changes in relation to retail and commercial activity across the authority and within the town centres.

- Chapter 5 provides commentary in relation to **Social Infrastructure,** principally monitoring change in respect of D class uses (as formerly known).

- Chapter 6 **Green Space** examines the effectiveness of policies in managing the loss of open space and biodiversity. Change is measured both in terms of development activity and in respect of the spatial extent of designations. A review of relevant appeal and departure decisions is also included.

- Chapter 7 is broad in terms of policy areas examining how effective planning policies have been in mitigating **Climate Change** as well as adapting to the consequences of environmental change. Policy areas covered in this section include waste, aggregates, flood risk, and the energy/carbon performance of buildings.

Monitoring is an ongoing and iterative process, and so where appropriate the report identifies how this activity will be refined/improved going forward.

2. Housing

Introduction

Subsection 3 of regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012 prescribes that an AMR should contain information regarding the supply and delivery of homes, during the monitoring period and over the life of the plan period and compare these measurable outputs against any prescribed targets/performance measures. As outlined in the introductory chapter this AMR is unique in that it reports on activity over a longer time period covering 5 years, and over this period and beyond, a number of targets have and are being redefined.

To assist in understanding which targets are used, when and for which purpose, the chapter initially provides an overview on the establishment of housing targets, exploring the relationship between need and supply based targets. Delivery is then examined for all tenures over the 5 year period. Pulling together the various strands in terms of inputs and relevant targets, this chapter will also contain the Five Year Housing Supply and Housing Trajectory, demonstrating future capacity and anticipated delivery. Whilst this AMR provides background to both, which is considered essential to the interpretation of other related indicators, the main outputs for both are omitted from this version of the AMR but will be included in the Final AMR report once published. Separately affordable housing is also measured relative to various policy targets set locally and regionally. The spatial delivery of housing permissions and completions relative to the two growth corridors defined in the Core Strategy, is also considered. Finally, this section also examines permissions in relation to accessible housing standards.

Establishing Policy Targets

The effectiveness of the Local Plan's housing planning policies can be measured in a number of different ways, including in relation to housing need, the supply of potential capacity and actual delivered capacity, and there are a number of associated indicators which can be examined. Broadly speaking targets can be split into two groups – need based and supply based targets. These targets continue to evolve overtime and their application varies by audience, as will be explained. This is complex, but the commentary below and summary table 2.5 should assist in understanding their application by year and output.

Need based targets

Strategic Housing Market Assessment (SHMA)

Ealing jointly with neighbouring authorities in West London has prepared and published a West London Strategic Housing Market Assessment in October 2018. This study provides an estimate of both the objectively assessed (housing) need and an estimate of affordable need as well. In terms of overall need for Ealing, the study gives two figures for Ealing, dependent on whether the population demand is accommodated through a higher number of smaller dwellings (2,003 per annum) or a lower number of larger dwellings (1,164 dwellings per annum). Further detail on the SHMA can be found here: 2018-October-West-London-Strategic-Housing-Market-Assessment.pdf (wla.london)

The GLA have similarly prepared their own SHMA (2017) which identifies a London wide need of 65,878 homes per annum. Whilst the London SHMA does not provide a breakdown of need by borough, this demand is effectively apportioned through the supply based targets in the New London Plan.

Standard method

The Government has also prepared its own alternative method for assessing housing need. The 'standard method' was first introduced in July 2018 through an update to the NPPF, to make the process of assessing need 'a simple, cheap and transparent exercise'. The published need figure for Ealing is calculated as 1,816 dwellings per annum, and at the time of publication of this report this is currently the operational standard method figure for the authority. It should be noted that all of the standard method figures given in this section are calculated from a specific point in time, and when applying them in practice it is necessary to recalculate them. Whilst the methodology is fixed for each iteration, the inputs will vary over time. These figures should therefore be interpreted as being indicative.

Largely driven by its ambition to boost supply to meet its 300,000 new homes per annum target, in August 2020 Government consulted on two sets of changes to the standard method. The first set of changes were intended to be short term and would result in a revised interim figure of (2,247 for Ealing). Secondly the Planning White Paper proposed further long-term changes to the standard method which would see Government issuing a new standard housing requirement figure to local authorities, which would be binding.

Having considered responses to the interim revised method, the Government advised in December 2020 that they no longer intend to proceed with this revised method, but instead will pursue a new reformed method adding an uplift to the original 2018 methodology, which results in a redistribution of need towards the cities and urban areas. For Ealing this gives an indicative revised need figure of 3,188 units per annum. It should be noted however that the reformed interim figures are not given effect until the next London Plan is being developed (the current London Plan was recently adopted in March 2021). In addition, for the purposes of the Housing Delivery Test the cities and urban centres uplift within the reformed interim standard method will only apply from the 2022/23 monitoring year. Moreover, as noted above it is proposed that at some point these will be replaced by a binding housing requirement figure, although it is not clear when that will happen or what the binding target for Ealing will be.

Table 2.1 – Application of Standard Method Figures

Standard Method Iteration	Need Figure (Indicative)	Status
Published July 2018	1,816	Current
Revised Interim Aug 2020	2,247	Abandoned
Reformed Interim Dec 2020	3,188	Application pending
Binding Housing Requirement Target	Not yet known	Awaited

Whilst the standard method figure is intended to principally inform plan making, it can also be relevant when monitoring delivery and supply, and in certain scenarios is used as the target set through the Housing Delivery Test and Five Year Housing Land Supply. In particular the standard method figure substitutes either a Local Plan or London Plan housing target/requirement where these were set and adopted more than 5 years ago.

For the Housing Delivery Test primacy is given first to a current adopted Local Plan figure, and in the absence of a current Local Plan figure then to a current Spatial Development Strategy target, and then finally in the absence of that to a standard method figure (note in respect of calculating the cap the reverse is true with primacy given to the Spatial Development Strategy). Ealing's Local Plan target was established and set through the Local Plan, which was adopted on the 3rd March 2012. For the purpose of the Housing Delivery Test this target is only relevant for those reporting years up to 16/17 (i.e. covering the period up to the 5th anniversary of its adoption). For 17/18 – 18/19 the target reverted to the adopted March 2016 London Plan. Whilst that plan wouldn't reach its fifth anniversary until March 2021, the housing targets themselves were set and adopted on the 10th March 2015 (i.e. reaching its fifth anniversary in March 2020). National guidance advises that where a housing requirement figure is adopted and then repeated in a subsequent plan without re-testing the housing requirement (as is the case with the 2016 London Plan), the housing requirement will be deemed valid for five years only from the first time that the figure was adopted (i.e. from the 10th March 2015 until the 9th March 2020). Where this 5th anniversary is part way through the year, the housing requirement figure will be apportioned based on the number of days in that year. For the purpose of the HDT for the reporting year 19/20 it was therefore assumed that Government will apportion most of the year based on the target in the 2016 London Plan, with the 12th month based on the standard method figure. Despite the rulebook, for 19/20 Government appear to have continued to employ FALP figure for the full duration of the year. It has been difficult to clarify this however (the individual working outs are not included for each authority), because the figures ultimately used for measurement were further adjusted removing the 12th month from the calculations to account for disruption caused by the first lockdown. For 20/21 it is anticipated that the requirement for 11 months of this year will be based on the published standard method figure of 1,816 (prorated), with the final month reflecting the new London supply target which was adopted on the 2nd March 2021. As with 19/20 further adjustments are also planned for 20/21 (a four month adjustment) to account for the on-going disruption caused by the COVID-19 pandemic.

For the purpose of preparing the 5 year land supply, in accordance with national guidance (paragraph 005) the cumulative supply requirement should be calculated utilising the standard method figure where either the Local or Spatial Development Strategy are older than 5 years.

Further details on the Housing Delivery Test and Five Year Land Supply are outlined below.

Self and Custom Build Housing

As well as establishing overall housing need, the SHMA and other assessments should also seek to examine the size, type and tenure of housing needed for different groups including those wishing to self or custom build their own homes.

In the context of the Government's commitment to boost housing supply it believes that the self and custom build housing sector has a key role to play and should also help in diversifying the housing market and increase consumer choice. Legislation has been introduced which requires local authorities to collate information on the demand for self-build and custom housebuilding and to plan for this. As required by the Self-build and Custom Housebuilding Act 2015, the local authority has maintained a register of interest since April 2016 - Self-build and custom build register | Self-build and custom build register | Ealing Council . This is a register of individuals or groups (associations) of individuals who are seeking to acquire serviced plots of land in Ealing to build their

own homes. The Act (as amended by the Housing and Planning Act 2016) places two further duties on the Council:

- A duty to have regard to the register when carrying out its planning, housing, land disposal and regeneration functions
- A duty to grant, within three years, to give 'suitable development permission' to enough serviced plots of land to meet the demand for self-build and custom housebuilding in the authority's area.

The level of demand is determined by reference to the number of entries added to the register during the defined base period. The first base period only covers a partial year running from 1st April 2016 until the 30th October 2016. Subsequent base periods run annually (covering 12 months) from 31st October until 30th October of the following year. As noted above, the Council has 3 years from the end of each base period to fulfil the duty to grant sufficient permissions to meet the need for that earlier base period.

The NPPG encourages authorities to publish headline data on the demand for self-build and custom housing building revealed by the register through their AMR. The table below records the number of registrations/entries recorded for each of the base periods, and the rolling total, up to the 30th October 2020.

Table 2.2 – Number of self and custom build registrations by year

Base Period	Individual Registrations (Plots)	Group Registrations (Plots)	Rolling total	Deadline for granting sufficient permissions
Base Period 1: 1st April 16 – 30th October 16 (partial year)	14	0	14	30/10/19
Base Period 2: 31st October 16 – 30th October 17	20[1]	0	34	30/10/20
Base Period 3: 31st October 17 – 30th October 18	14	1[2]	49	30/10/21
Base Period 4: 31st October 18 – 30th October 19	11[3]	0	60	30/10/22
Base Period 5: 31st October 19 – 30th October 20	15	0	75	30/10/23

[1] Note this figure has been corrected (from 23) as reported previously in an MHCLG return.
[2] Note for one entry the form was completed incorrectly and so unclear if registration was made as individual or group.
[3] Note this figure has been corrected (from 12) as reported previously in an MHCLG return.

Over the first five base periods a total of 75 registrations have been made (equating to 75 plots), although it is important to note that this may over represent the cumulative registered need in Ealing, as a significant proportion of entrants (31 in total) have registered interest with more than one authority. Since a self/custom build scheme must be occupied as the principal residence, that need for a single plot can only be met in one authority area. It is possible then that some of the individuals who have registered interest in Ealing, may pursue a self/custom build project in a

neighbouring borough, and in which case that need no longer needs to be satisfied in Ealing. At present though there is no mechanism by which the LPA can track, monitor and adjust for multiple authority registrations. Despite the cumulative figure of 75 potentially representing an inflated need figure, setting this to one side for now, this would equate to an average need of around 15 plots per annum. As a proportion of all housing need this represents only 0.83%, applying the (overall) current standard method need figure.

As part of the registration process further info is also obtained regarding the nature of interest, to establish preferences around the type of project, housing typology, size, and location being pursued. Information on financial circumstances and readiness to commence development is also collected. A high-level analysis of this identifies some key headline findings. 72 of the 75 individuals/groups registered indicate that they wish to pursue individual self-build schemes. Much smaller numbers indicate that they are interested in pursuing group builds. In terms of house type, detached houses are by far the preferred typology (with a count of 69). The interest in pursuing flatted projects is considerably lower, although not surprising given the standard model for self/custom build projects. There is also a clear preference for larger sized properties as well in terms of the number bedrooms. In terms of preferred localities it is more difficult to draw out preference, but there does seem to be a slightly higher emphasis on central Ealing areas, Acton and Northfields. These results around preferences are not at all surprising, but they do pose some challenges in terms of responding to this need. Specifically accommodating larger detached house types may in some cases conflict with the policy objective to optimise site capacity.

As indicated above at the end of each base period the Council has three years in which to permission an equivalent number of plots of land, as there are entries for that base period. It is important to note however that there is no duty on the authority to permission land which specifically satisfies the need/preferences of those on the register, although in understanding need more generally regard should had to the preferences expressed. For the first, second and third base periods sufficient plots should be permissioned by 30th October 2019, 30th October 2020 and 30th October 2021 respectively. The legislation does not specify how authorities should demonstrate that they have granted sufficient permissions, and in what circumstances would a permission qualify against this requirement. Guidance from MHCLG on data reporting indicates a number of sources/methods which might be used as follows to identify and determine whether a permission should be counted:

- Whether developers have identified that self-build or custom build plots will be included as part of their development and it is clear that the initial owner of the homes will have primary input into its final design and layout;
- Whether a planning application references self-build or custom build and it is clear that the initial owner of the homes will have primary input into its final design and layout. To assist monitoring of self and custom build schemes the 1APP form was updated in January 2019 to include a separate category for self/custom build.
- Whether a Community Infrastructure Levy or Section 106 (self-build) exemption has been granted for a particular development.

Data recorded in respect of the first and second sources above is somewhat patchy and is often not verified. Analysing schemes which have benefitted from a self-build exemption is a more reliable source, although it is important to recognise that this may still not represent a complete and comprehensive picture of self-build permissions. For example exemption may not be sought in all cases, or procedural failings by the applicant may result in the applicant having to forfeit an exemption. The table below provides a breakdown of how many permissions have benefitted from a self-build exemption (and confirmed by the Council), since the introduction of a register in April

2016. Note 9 applications were granted CIL self-build exemptions prior to this date, but these permissions are not included in the count, although some of these will have been delivered during the monitoring window.

Table 2.3 – Number of permissions benefitting from CIL Self-Build Exemptions by base period

Period	Need (plots) registered	Rolling (need) total	Permissions benefitting from exemption given during period	Permissions given by three year deadline for that base period
1/4/16 – 30/10/16	14	14	1	16 (by 30/10/19)
31/10/16 – 30/10/17	20	34	6	21 (by 30/10/20)
31/10/17 – 30/10/18	15	49	2	TBD (by 30/10/21)
31/10/18 – 30/10/19	11	60	7	TBD (by 30/10/22)
31/10/19 – 30/10/20	15	75	5	TBD (by 30/10/23)

It is recognised that the process of securing permissions might also be facilitated through the development plan, and the potential to identify and allocate plots through the new Local Plan is being explored. As noted in the commentary above the suitability of sites for self-build housing will also need to be balanced against the requirement to accommodate other tenures/typologies of housing as well as other uses, and the policy imperative to optimise sites.

Supply based targets

Both the Local Plan and London Plan set housing delivery targets which are supply based. The main input informing these supply based targets is the Pan-London Strategic Housing Land Availability Assessment (SHLAA), of which there have been various iterations over the years. The SHLAA is essentially an estimate of the amount of housing capacity that could be brought forward and delivered over a defined period (typically aligned with the plan period). The SHLAA examines a range of sources of housing supply to establish an understanding of capacity, including estimating outputs for known sites and moderated by probability, as well as forecasting and modelling capacity outputs from windfall sites. This capacity is then attributed to different phasing periods based on an estimate of the timing of likely delivery. The output of this is an aggregated capacity figure for the plan period, which can also be annualised to assist monitoring.

In terms of the Local Plan, the adopted housing target is set out in the 2012 Core Strategy which was adopted on the 3rd April 2012. This established a target of 14,000 net additional homes over a 15 period, which equates to 933 units per annum when annualised. It should be noted however that the base period for the plan started a year earlier in April 2011, which is relevant to the Housing Delivery Test.

Whilst the 2012 Core Strategy target remains the adopted one locally, over the monitoring period reported, regard has also to be had to the targets established through the London Plan. Forming part of Ealing's Development Plan the Further Alterations to the London Plan (published 10 March 2015) raised the target to 1,297 net additional dwellings per annum. Whilst further revisions were adopted in March 2016, the housing targets remained unchanged from those published in March

2015. Since 2015 for most purposes the Council has been planning against the higher London Plan figure seeking to meet and exceed this in relation to delivery. In particular the Housing Trajectory employs the 2015 London Plan target from 2015/16 onwards until 2019/20. Despite this, the Local Plan targets have remained operational well beyond 2015 for certain measures including the Housing Delivery Test. Unlike the trajectory for the purpose of the Housing Delivery Test primacy is given to Local Plan targets over the Spatial Development Strategy targets where these remain current (i.e. up to its 5th anniversary). For the years up to 2016/17, the Local Plan target of 933 has been used, and not the London Plan target of 1,297 despite that already been adopted at that time.

The new London Plan 2021 (published 2nd March 2021), establishes revised supply based targets. Again, these are purely supplied based, and a direct output of the 2017 Pan London SHLAA and are not informed by individual borough need figures, although the overall need figure (66,000) for London established in the GLA's SHMA, has clearly been a primary driver for finding capacity. For that reason it could be said that the new London Plan's LPA delivery targets represent the London need figure apportioned to LPA's based on their identified potential capacity.

Through the preparation of the new London Plan the revised delivery targets themselves have gone through various revisions, with the figure for Ealing now sitting at 21,570 net additional units to be delivered over a 10 year period. Although the new London Plan intentionally no longer annualises these figures, for the purpose of this exercise and preparing the trajectory, it has been necessary to do this. Although not adopted until March 2021, the new London Plan targets apply in part retrospectively as they are intended to be monitored from 1st April 2019. The Housing Trajectory will employ the new London Plan annualised target of 2,157 for year 2019/20 onwards. It is also important to note that the new London Plan targets are not directly comparable to either the previous London Plan targets or the target established through the Local Plan, as the previous targets were determined based on the borough as a whole (which now includes the OPDC demise), whilst the new London Plan target is based on the smaller newly defined LPA geographical area as this reflects the extent of Ealing Council's influence as a local planning authority (LPA). Although the new London Plan does not establish a comparative Ealing Borough target, and for good reason, it is possible and useful to derive such a figure. Although this shouldn't be used for monitoring purposes at the very least it is helpful in appreciating the true uplift in the target between this London Plan and the previous one. Table 2.4 below outlines the breakdown used to arrive at a comparative borough figure. The borough supply figure equates to 2,769 units per annum, representing a 113% increase on the 2015/16 London Plan target.

Table 2.4 – Breakdown of new London Plan housing supply target

Ealing LPA				
Status	Total	Large	Small	NSC
Pre-EIP (2017)	2,807	1,643	1,074	90
Final	2,157	1,643	424	90
OPDC capacity in Ealing				
Status	Total	Large	Small	NSC
Pre-EIP (2017)	612	606	6	-
Final	612	606	6	-
Ealing Borough (with OPDC capacity assigned)				
Status	Total	Large	Small	NSC
Pre-EIP (2017)	3,419	2,249	1,080	90
Final	2,769	2,249	430	90

Table 2.5 below summarises which target is applicable by year and output.

Table 2.5 – application of target by year and output

Year	London Plan Target (Net)	*London Plan Source*	Local Plan Target (Net)	National Need Target (Standard Method)	National Target (HDT)	Trajectory	5-year Land supply (scenarios i & ii)		Additional Notes
2003/4	**650**	*2004 LP*	540	-	-	-	-	-	
2004/5	**650**	*2004 LP*	650	-	-	650	-	-	
2005/6	**650**	*2004 LP*	650	-	-	650	-	-	
2006/7	**650**	*2004 LP*	650	-	-	650	-	-	
2007/8	**915**	*2008 LP*	650	-	-	915	-	-	
2008/9	**915**	*2008 LP*	650	-	-	915	-	-	
2009/10	**915**	*2008 LP*	650	-	-	915	-	-	
2010/11	**915**	*2008 LP*	650	-	-	915	-	-	
2011/12[1]	890	*2011 LP*	**933**	-	-	933	-	-	[1]Note the base year for the Local Plan is 2011, despite being adopted in 2012.
2012/13	890	*2011 LP*	**933**	-	-	933	-	-	
2013/14	890	*2011 LP*	**933**	-	-	933	-	-	
2014/15	890	*2011 LP*	**933**	-	-	933	-	-	
2015/16	**1297**	*2015 FALP*	-	-	933	1297	1297		
2016/17	**1297**	*2015 FALP*	-	-	933	1297	1297		
2017/18	**1297**	*2015 FALP*	-	-	1295[3]	1297	1297		[3]Note minor adjustment to FALP target as two days from this financial year apportioned based on Local Plan Target which expired 02/04/17
2018/19	**1297**	*2015 FALP*	-	1816	1297	1297	1297		
2019/20	**2157[4]**	*NLP*	-	1816	1,190[5]	2157[4]	1297	2157	[4]Note the New London Plan figures are not annualised but are expressed as annual targets for the purpose of this exercise. [5]To reflect the temporary disruption caused by the first Covid lockdown, the period for measuring the homes required in 2019/20 has been reduced by one month.
2020/21	**2157**	*NLP*	-	1816	TBD[6]	2157	1297	2157	1st April 2020 is the base point for 5 yr land supply [6]It is anticipated that the requirement for 11 months of this year will be based on the published standard method figure of 1,816 (prorated), with the final month reflecting the new London supply target which was adopted on the 2nd March 2021. As for 19/20 further adjustments are also planned for 20/21 (a four month adjustment) to account for the on-going disruption caused by the COVID-19 pandemic.
2021/22	**2157**	*NLP*	TBD	1816	TBD[7]	2157	1297	2157	[7]Dependent on timing of adoption of NLP. Target might be part apportioned between NLP and standard method
2022/23	**2157**	*NLP*	TBD	TBD[8]	TBD[9]	2157	1297	2157	[8]Guidance indicates that the Reformed Standard Method figure for plan making purposes will only apply once the next London Plan is being developed – the timing of which is unclear at present. An indicative figure of 3188 for Ealing has been published, although the NPPG advises that it is the responsibility of the Mayor to determine how they distribute need to individual boroughs. At some point in the future this interim target will also be replaced by a Binding Requirement. [9]The NPPG indicates that the Reformed Interim Standard Method figure - 3188 (incorporating cities uplift) could apply from 2022/23 for HDT purposes, but not clear yet if this arrangement will also apply in London. In addition based on current HDT Rulebook primacy might still be given to Local Plan/London Plan target
2023/24	**2157**	*NLP*	TBD	TBD	TBD	2157	1297	2157	
2024/25	**2157**	*NLP*	TBD	TBD	TBD	2157	1297	2157	
2025/26	**2157**	*NLP*	TBD	TBD	TBD	2157	-	-	
2026/27	**2157**	*NLP*	TBD	TBD	TBD	2157	-	-	
2027/28	**2157**	*NLP*	TBD	TBD	TBD	2157	-	-	
2028/29	**2157**	*NLP*	TBD	TBD	TBD	2157	-	-	
2029/30	TBD	*TBD*	TBD	TBD	TBD	2157[10]	-	-	[10]Target is rolled forward rather than basing this on latter phases of the 2017 SHLAA.

Year	London Plan Target (Net)	*London Plan Source*	Local Plan Target (Net)	National Need Target (Standard Method)	National Target (HDT)	Trajectory	5-year Land supply (scenarios i & ii)		Additional Notes
2030/31-40/41	TBD	*TBD*	TBD	TBD	TBD	2157[10]	-	-	[10]Target is rolled forward rather than basing this on latter phases of the 2017 SHLAA.

Housing Delivery – All Tenures

Having established which targets apply when and where, the following sections record performance in respect of delivery against these housing targets/requirements. Whilst the primary measure of delivery is completed housing units, it is useful to monitor permissions as well in terms of how many have been granted approval during a defined period. Approvals possibly represent a better indicator of an LPAs performance, as unlike completions, the authority has greater influence over these. Where appropriate then, figures are given both in terms of approvals and completions.

The figures given are usually net (i.e. losses of existing units are subtracted from the gains) unless otherwise stated.

Local reporting

In respect of the supply targets outlined above these comprise three components. When measuring delivery against these targets it is therefore essential to measure like with like and similarly apply the same definitions. This first delivery section deals with cumulative total of all three components, with later sections being limited to only certain elements. The three components are as follows:

A) - Conventional Supply/Accommodation - These are new homes created from new build, conversions (i.e. larger units being sub-divided), or through a change of use. The latter category also includes units created under permitted development (including prior approvals). Temporary permissions are captured in these figures. This definition only includes dwellings that are fully self-contained; meaning that they have kitchen and bathroom facilities behind their own lockable door. For the purpose of this exercise small Houses in Multiple Occupation (HMOs) (comprising between 1-6 bedrooms) are included in the conventional total. As these are recorded in terms of bedrooms rather than as a unit in the LDD, to add them to the conventional total small HMO bedrooms are converted to units based on an interpretation of physical building/planning unit, rather than applying a ratio conversion. For example a 4 bed HMO which functions like a single unit, would count as one conventional unit.

B) - Non-Conventional or Non-Self-Contained (NSC) supply/accommodation - is any other form of living accommodation which does not meet the definition of self-contained. Within Ealing this predominately comprises student accommodation, large HMOs (7 bedrooms or more), hostels, shared or co-living accommodation and specialist housing for older people (in use class C2) e.g. care homes. NSC accommodation is presently recorded in the LDD as a bedroom rather than a unit measure. In order to count the contribution of NSC accommodation it is necessary to convert the bedroom measure into units. How this is done varies dependent on the year. For historical reporting up to and including 18/19, NSC accommodation of all forms will count towards meeting the housing target on the basis of a 1:1 ratio, with each bedroom being counted the same as a single home. For example, a small HMO (containing up to six rooms) will count as a single conventional unit, whereas a large HMO (e.g. With 7 bedrooms) is classified as a hostel with each bedroom being

counted as a single home (i.e. therefore counting as 7 units). Different ratio/s are employed for 19/20 and in respect of the pipeline informing future years in the trajectory. Further detail on this is contained in that section of the report.

C) - Vacants – this component comprises long-term vacant properties which have returned to use. Unlike the other components which are derived from the LDD, this element is derived from the council Tax Base as published by MHCLG. it should be noted that this data covers the period from October to October and so therefore doesn't align exactly with the time period used for the rest of the data, but it remains the best available information. As an input the vacant count is relevant to past completions (i.e. the 5 reporting years covered here). It doesn't however feature in future projections as detailed in the trajectory.

Tables 2.6 and 2.7 below show the number of net additional homes permitted between 2014 and 2020 against the applicable London Plan target, at borough and LPA level respectively. The figures for 2019/20 are currently being confirmed and will be added in the 'Final AMR'. In respect of table 2.7 for LPA permissions, the figures are only compared against the London Plan targets for 2014/15 and 2019/20, as these are the only years where the targets are LPA based. Purely for the purpose of facilitating comparisons to be made between permission and completion totals 'Vacants' are included in the 'permission' tables, despite these figures representing actual change (gains/losses) rather than permitted change as is the case for all of the other inputs in tables 2.6 and 2.7. The tables illustrate that for permissions Ealing has been comfortably exceeding the target, with a notable further acceleration in 2016/17. In respect of the non-conventional units, there is a notable difference between the LPA and Borough figures for 2017/18, with the latter being significantly higher. This has arisen because of a concentration of activity of schemes comprising student accommodation within the OPDC demise of the borough.

Table 2.6 - Number of Net additional homes Permitted against target (2014-2020) (Borough)

Year	Net Conventional	Net Non-conventional	Vacants *	Total	London Plan Target	% of Target
2014/15	1990	-7	-514	**1469**	890	**165.1%**
2015/16	2243	109	-28	**2324**	1297	**179.2%**
2016/17	4501	447	-106	**4842**	1297	**373.3%**
2017/18	4585	1292	-49	**5828**	1297	**449.3%**
2018/19	3184	23	334	**3541**	1297	**273%**
2019/20	**TBC**	**TBC**		**TBC**	NA	**NA**

** Source MHCLG Housing live table 615 (https://www.gov.uk/government/statistical-data-sets/ live-tables-on-dwelling-stock-including-vacants). These represent actual rather than permitted figures.*

Table 2.7 - Number of Net additional homes Permitted against target (2014-2020) (LPA)

Year	Net Conventional	Net Non-conventional	Vacants *	Total	London Plan Target	% of Target
2014/15	1990	-7	-514	**1469**	890	**165%**
2015/16	2226	109	-28	**2307**	NA	**NA**
2016/17	4456	447	-106	**4797**	NA	**NA**
2017/18	4499	186	-49	**4636**	NA	**NA**
2018/19	3164	23	334	**3521**	NA	**NA**
2019/20	**TBC**	**TBC**	**TBC**	**TBC**	2157	**TBC**

** Source MHCLG Housing live table 615 (https://www.gov.uk/government/statistical-data-sets/ live-tables-on-dwelling-stock-including-vacants). These represent actual rather than permitted figures.*

Whilst the previous tables are helpful in illustrating the large number of units secured on paper through planning permissions, not all of these permissions will necessarily translate into homes built and completed for occupation. There are multiple reasons for this, many of which are beyond the Council's control. The principal means of measuring performance then involves examining completions.

The number of net additional homes completed between 2014 and 2019 against the relevant London Plan target is illustrated in tables 2.8 and 2.9, at borough and LPA scales respectively. Whilst unit completion relative to the targets does fluctuate from year to year with some years being well below (such as 2014/15) the target and other years being well above (such as 2018/19) the target, average delivery/completions are around 1,374 exceeding the target. The inclusion of the 'Vacants' figure in the calculation has had significant bearing on the overall figures, and this is largely beyond the Council's influence as a planning authority. Comparing the LPA and Borough figures it is also evident that completed units within the OPDC area, made a significant contribution in 2015/16 and 2016/17.

Table 2.8 - Number of Net additional homes Completed against target (2014-2020) (Borough)

Year	Net Conv	Net Non-conv.	Vacants *	Total	London Plan Target	% of Target
2014/15	845	82	-514	**413**	890	**46.4%**
2015/16	1062	616	-28	**1650**	1297	**127.2%**
2016/17	1245	346	-106	**1485**	1297	**114.5%**
2017/18	1118	76	-49	**1145**	1297	**88.3%**
2018/19	1756	87	334	**2177**	1297	**167.8%**
2019/20	**TBC**	**TBC**	**TBC**	**TBC**	NA	**NA**

****** Source MHCLG Housing live table 615 (https://www.gov.uk/government/statistical-data-sets/ live-tables-on-dwelling-stock-including-vacants)*

Table 2.9 - Number of Net additional homes Completed against target (2014-2020) (LPA)

Year	Net Conv	Net Non-conv.	Vacants *	Total	London Plan Target	% of Target
2014/15	845	82	-514	**413**	890	**46.4%**
2015/16	1056	-43	-28	**985**	NA	**NA**
2016/17	1228	23	-106	**1145**	NA	**NA**
2017/18	923	76	-49	**950**	NA	**NA**
2018/19	1733	87	334	**2154**	NA	**NA**
2019/20	**TBC**	**TBC**	**TBC**	**TBC**	2157	**TBC**

***** Source MHCLG Housing live table 615 (https://www.gov.uk/government/statistical-data-sets/ live-tables-on-dwelling-stock-including-vacants)*

As for other development indicators direct comparisons shouldn't be made within a given year between permissions and completions. The LDD also records all losses in the final year of scheme completion, while gains can be spread over several years, and often prior to the final scheme completion date. For example gains (in gross terms) from an individual scheme may be recorded in previous reporting years, but these are not offset by losses of existing units until the final completion date of the scheme in its entirety. The DataHub in contrast allocates losses to the year in which the work started. It now also applies this approach retrospectively to previously reported completion figures. Both approaches can give rise to a mismatch in reporting between the existing and proposed figures utilised to arrive at the net figure for a given year. This transition in approach in terms of how losses are accounted in yearly reported figures results in very significant differences. This is particularly evident when comparing past completion figures in previous GLA AMR reports with those figures now reported through the DataHub Dashboard.

Any trends that emerge in respect of completions may originate in part from approval activity occurring a number of years previously. Equally however such trends in historical approval rates, may not play out in terms of completions either. For example an upward trend in permissions in recent past years may not translate into a consistent and comparable upward trend in completions.

Research and analysis has been undertaken both nationally and regionally examining trends in build out rates and identifying the factors/barriers impacting on rates of delivery. These highlight some key findings, but to understand this better at a local level, the LPA will undertake further work to examine historical build out rates/trends in Ealing. This may involve analysing past development activity data to establish average build out rates/periods, from the point that all the necessary permissions have been secured, establishing the average time from permission, to start, to completion, based on different typologies and scales of development. In addition, the number of starts and lapsed schemes recorded annually will also be assessed and reported.

National reporting

As well as reporting locally and regionally against Local Plan and London Plan housing targets as detailed in the previous section, the Government separately measures housing delivery for each plan making authority in the country and imposes sanctions/consequences where delivery has fallen below the requirement. Housing Delivery Test results for each local authority in England are published annually, normally in February, providing a measure of performance based on the housing requirement for the proceeding 3 financial years.

The Housing Delivery Test is a percentage measurement of the number of **net homes delivered** against the **number of homes required,** as set out in the relevant strategic policies for the areas covered by the Housing Delivery Test (or in some cases local housing need), over a rolling three year period. Essentially the Housing Delivery Test compares the net number of homes delivered over the previous three financial years to the homes required over the same period. As noted above for the purpose of the Housing Delivery Test the Local Plan target has endured beyond the adoption of the London Plan targets in 2015, in accordance with national guidance.

The first Housing Delivery Test results, covering the three-year period from April 2015 to March 2018, were published in February 2019. A second set of results were published in February 2020 covering the three year period from April 2016 to March 2019. A third set of results were published in January 2021, which covered the three year period from April 2017 to March 2020 (technically February 2020). To account for the disruption to housing delivery caused by the restrictions in response to the COVID-19 pandemic, an adjustment was made to the 2020 Housing Delivery Test measurement, which has involved leaving out a month's worth of councils' housing requirement figures. As a result, the reduced requirement means that each local authority's requirement has been calculated from 01/04/17 to 01/03/20, totaling 35 months, in contrast to the 36 month requirement used to calculate earlier tests. The results for the first three annual measurements are set out below.

Table 2.10 – Housing Delivery Test results (2018)

Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2018 measurement	Housing Delivery Test: 2018 consequence
2015-16	**2016-17**	**2017-18**		**2015-16**	**2016-17**	**2017-18**			
933	933	1,295	3,162	959	989	1,479	3,427	108%	None

Table 2.11 – Housing Delivery Test results (2019)

Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2019 measurement	Housing Delivery Test: 2019 consequence
2016-17	**2017-18**	**2018-19**		**2016-17**	**2017-18**	**2018-19**			
933	1,295	1,297	3,525	989	1,479	1,746	4,214	120%	None

Table 2.12 – Housing Delivery Test results (2020)

Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2020 measurement	Housing Delivery Test: 2020 consequence
2017-18	2018-19	2019-20		2017-18	2018-19	2019-20			
1,295	1,297	1,190	3,782	1,479	1,746	1,863	5,087	135%	None

In terms of the first three annual results Ealing has passed the test, and no interventions/actions have been triggered. In terms of future results, as the rolling three year period shifts forward, the cumulative requirement will increase reflecting the rising targets in recent years, and therefore passing the test may become more challenging overtime.

Future Supply / Delivery

As well as examining actual delivery over the recent reporting period (i.e. 2014/15 - 2018/19), it is also necessary to understand and track how these past yearly figures contribute to a longer term position of meeting the housing requirement. Whilst the housing targets/figures are often annualised to assist with yearly monitoring, these targets typically derive from a larger target covering a longer window of time (which in most cases are linked to the life of the development plan or the duration of the targets). It is essential therefore that delivery is examined and considered over this longer time frame, and that this analysis looks both backwards (in terms of historical delivery and any unmet shortfall), and forwards (in terms of anticipated delivery over future years).

Two key tools are necessary in tracking progress against the overall housing requirement figures. A **five year housing land supply** provides an indication of whether there are sufficient sites available to meet the housing requirement for the next five years. Building from this, the **Housing Trajectory** examines a longer time frame (looking forward 15 years), and attempts to set out the Council's anticipated delivery rates for housing over that period, which can then be measured against the overall defined requirement. There is clearly overlap between the two, with both sharing some of the same inputs for the first five years, but there are some differences also in respect of the targets employed, and the consideration of historical delivery. These differences in methodology and other assumptions are outlined below.

It should be noted that a Five Year Housing Land Supply and Trajectory were originally prepared to support the preparation of the current Local Plan, and specifically the setting of housing targets and the allocation of sites. The need to confirm the existence of a 5 year supply from the intended date of adoption of the Local Plan is an essential piece of evidence assessed during the examination in public as required through the NPPF. At the time of the current Local Plan's adoption in 2012 both tools demonstrated that Ealing had a healthy supply of sites and predicted a level of future delivery comfortably in excess of the overall housing requirement as set at the time. As well as confirming this position at the outset of the plan period, the NPPF requires authorities to demonstrate that they can maintain this supply beyond the base year of the plan, and therefore there is a need to update the five year land supply and trajectory regularly.

This is also necessary to support the decision taking process as well, as a local authority may be asked to demonstrate an up to date 5 year land supply at any point in time in response to an application or appeal. It is important then that it is viewed as a live process, with the position

changing with each permission given and every home built. To complicate matters, such changes are not just limited to the supply inputs, but the targets we are measuring against are also evolving too. Ideally once the plan target has been established and tested this would provide a consistent basis for the five year land supply requirement, but for Ealing and other London boroughs it is necessary to respond to the changing landscape of targets. In recognition of this, in preparing the updates to be published in the AMR, a number of scenarios have been created. Finally, it should be noted that the 5 Year Supply update/statement contained in the AMR does not constitute a formal Annual Position Statement as prescribed through the NPPF/NPPG, but nonetheless represents a useful update to track progress.

As noted in the introduction the actual five year land supply and trajectory outputs are omitted from this interim report on the AMR, but will be published in due course in the final AMR. An outline of the methodology for each is included in the interim report however as this should provide useful context.

Five Year Housing Land Supply

Methodology for calculating Ealing's Five Year Housing Land Supply.

Paragraph 73 of the NPPF advises that 'Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.'

Essentially the process involves comparing the identified deliverable supply against the housing requirement for the next five year period, to determine whether this supply is sufficient to meet or exceed it. The following components make up the 'requirement' and 'supply' inputs.

NEED/REQUIREMENT
A – The (basic) housing requirement for the next 5 years

The NPPG advises that the housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5 year housing land supply figure where:

- the plan was adopted in the last 5 years, or
- the strategic housing policies have been reviewed within the last 5 years and found not to need updating.

In other circumstances the 5 year housing land supply will be measured against the area's local housing need calculated using the standard method.

The NPPG also advises that where there is more than one strategic housing requirement for an area (as is the case in London where housing supply targets are established through the London Plan), primacy is given to the most recently adopted policies for the purpose of this calculation. Note this approach departs from that taken for the Housing Delivery Test.

As advised previously in the 'Establishing Policy Targets' section above, Ealing's Core Strategy which established the housing requirement reached its fifth anniversary in 2017 and is therefore not current for the purpose of this exercise. In accordance with the guidance even before the Core Strategy target had reached its fifth anniversary for this exercise, it would have been superseded by the target established in the 2015 London Plan (FALP). As of March 2020, this too has expired for

the purpose of this exercise. In the absence of a current and adopted Local Plan or Spatial Development Strategy target, national guidance requires that authorities use the standard method. Utilising the methodology which is currently operational Ealing's current standard method figure is 1816 units per annum. As of March 2021, and at the time of writing the new London Plan has now been adopted.

Recognising that the AMR needs to fulfil a number of functions, including examining past recent performance, and establishing current performance/future performance against emerging requirements, it is prudent to test the supply inputs against a number of housing requirement scenarios. The following two scenarios have been tested:

i) Utilising the 2015 London Plan (FALP) targets, representing a historical snapshot of performance given the long period of time covered by this AMR. All figures recorded under this scenario are borough wide (including the OPDC demise).

ii) Utilising the 2021 London Plan housing supply targets, to provide a measure of performance against the published policy target. All figures employed in this scenario are LPA based (excluding the OPDC demise).

In all cases the annualised housing requirement figure needs to be multiplied by 5, to establish the overall target.

A starting year of 2020/21 has been employed for this Five Year Housing Land Supply.

B – Shortfall/Surplus

In calculating the cumulative housing requirement figure for the next 5 years, alongside the baseline figure it may also be necessary to add any shortfall/deficit arising from under delivery against targets in previous years covered by the plan or target. This is relevant to both scenarios.

This is calculated by comparing the housing completion data against the target. The NPPG advises that the level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 years. For scenario i) as this is employing the 2015 London Plan (FALP) targets a base year of 2015/16 is used. Completions data is only available up to 19/20, and so any deficit is determined from these five years only. As the FALP requirement is borough based, the examination of shortfall similarly needs to be made on a borough basis.

In the case of scenario ii) which employs the recently adopted 2021 London Plan targets, a base date of 19/20 is used. Given that the start year for this 5 year land supply is 2020/21, for this scenario past delivery is examined based on a single year only (2019/20). As the target for this previous year is LPA based, any shortfall is also measured utilising the same spatial scale.

As well as accounting for past under delivery, in line with the advice contained in the NPPG, in the event that historical completions for a given year have exceeded the planned requirements for that year, the difference/surplus will be used to offset any shortfalls against requirements from previous years.

C – Buffer.

To ensure that the 5 year land supply is sufficiently flexible and robust it is necessary to add an appropriate buffer to the housing requirement for the first 5 years including any shortfall, as covered by A and B above. Whilst this will result in a requirement over and above the level indicated by the strategic policy requirement or the local housing need figure, the intention is to ensure that authorities identify added supply in the hope that this will encourage greater delivery at a level which meets or exceeds the requirement.

The NPPF identifies three potential buffer levels, whose application varies dependent on circumstances as follows.

- 5% - the minimum buffer for all authorities, necessary to ensure choice and competition in the market, where they are not seeking to demonstrate a 5 year housing land supply;
- 10% - the buffer for authorities seeking to 'confirm' 5 year housing land supply for a year, through a recently adopted plan or subsequent annual position statement (as set out in paragraph 74 of the NPPF), unless they have to apply a 20% buffer (as below); and
- 20% - the buffer for authorities where delivery of housing taken as a whole over the previous 3 years, has fallen below 85% of the requirement, as set out in the last published Housing Delivery Test results.

As outlined in the previous section under target setting Ealing has passed the first three Housing Delivery Tests, and therefore there is no requirement to apply a 20% buffer. It should be noted that the inputs and targets employed for the Housing Delivery Test as prescribed by Government are inconsistent with the measure of past delivery employed (reflecting Government Guidance for calculating housing supply) under part B above, and so comparisons should not be made.

The Council has also not notified the Planning Inspectorate of an intention to submit an annual position statement, and therefore this update on the Five Year Housing Land Supply does not constitute a formal Annual Position Statement. Under the circumstances it is therefore not necessary to apply a 10% buffer.

A buffer of 5% has been employed for the purpose of this exercise.

SUPPLY

Having first established the cumulative housing requirement figure for the next 5 years, it is necessary to establish and evidence what supply is expected to be delivered over this period. This can be informed by a range of sources including amongst other things the SHLAA, and the latest pipeline data from London Development Database. The goal is to identify a supply of specific deliverable sites to provide a minimum of five years' worth of housing when measured against the housing requirement.

For the purpose of this exercise and to ensure consistency with the evidence and approach informing the setting of the housing requirement targets, a distinction is made between large, small sites and non-conventional capacity. Large sites are those with an area of 0.25ha or greater, and small sites are those with an area of less than 0.25ha.

As noted above in identifying supply for scenarios i) the full extent of the borough is examined. For scenario ii) only supply from sites in the LPA area are counted.

D – Deliverable capacity on large sites

As defined in the NPPF and associated guidance the capacity identified for the five year land supply must qualify as being deliverable. The definition of deliverable is set out in the NPPF as follows:

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years. In particular:
a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within 5 years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.

The NPPG provides further information on what evidence is needed to demonstrate deliverability in respect of that capacity identified under b) above. This may include:

- current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;
- firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;
- firm progress with site assessment work; or
- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.

Applying the large site size threshold, the following components are feeding into the overall supply calculations:

i) Conventional capacity from sites with full planning permission. This includes permissions and prior approvals which have not started (extant), or started (under construction / partially implemented). Where a development scheme has been partially implemented, only the outstanding capacity yet to be delivered and anticipated to be delivered over the next 5 years has been included, informed by phasing plans and other evidence where available. Furthermore, where there are multiple permissions for a development site, superseded units are not included in the assumed delivery to avoid double counting.
ii) Conventional capacity from sites with outline permission, where there is confidence that this capacity will be delivered within 5 years.

iii) Conventional capacity from sites with pending decisions, where compelling evidence exists to confirm that delivery will occur in the first 5 years. This may include live cases which are still be assessed, and others where a resolution to grant has been given and the scheme is awaiting the legal agreement being signed.
iv) Conventional capacity from sites not benefitting from a permission or application, but where sufficient progress has already been made towards the submission of an application and where there is confidence that this capacity will be delivered within 5 years. This might include sites which are allocated or otherwise. A cautious approach is taken when identifying such capacity for inclusion in the supply figures.

E – Small site capacity

As with the SHLAA, and the process of target setting, the small sites component is not based on estimated capacity from known sites, but instead small sites are treated as a windfall component and the deliverable capacity is determined based on either forecasting or modelling or a hybrid approach. Reflecting the different methodologies used at the time to generate the targets, different small site assumptions/inputs are applied to each of the scenarios presented.

For scenario i) which utilises the 2015 London Plan (FALP) targets and which were underpinned by the 2013 SHLAA, and is based on a more traditional windfall approach. This approach involves assessing future housing yield on small sites based on extrapolating historic trends, drawing on past completion data. At the time the annual capacity yield for small sites was determined based on the annual average of net conventional completions on small sites over an 8 year period between 2004-2012. This gave an annual average of 301 units. Utilising this same methodology this figure can be updated using the more up to date time series of 2008-2016. Based on this period the annualised average delivery on small sites is 303 units. It is proposed that future capacity from small sites is based on this figure (multiplied by 5 to reflect the duration of the supply period).

For scenario ii), which employs the 2021 London Plan housing targets, the future small site supply estimate is aligned with the revised methodology and figure underpinning the target. The methodology used to determine this is based on a hybrid approach of forecasting and modelling, and gives an annualised small sites supply figure of 424 net units.

F – Non-Conventional supply

To ensure that the requirement and supply inputs can be fairly compared, it is necessary to ensure that the same assumptions/methodology for determining the non-conventional component of the target is also applied to determining/evidencing future supply.

Non-conventional supply is determined based on the net pipeline of approved units anticipated to be delivered within 5 years. As with the large sites component, it is necessary to ensure that the Council has confidence that this capacity will be delivered during this period.

As noted earlier in this report NSC accommodation is presently recorded in the LDD as a bedroom measure rather than a unit measure. In order to count the contribution of NSC accommodation to the supply it is necessary to convert the bedroom measure into units. The process of doing this varies between scenarios, again reflecting the changes in methodologies over time. For scenario i) the NSC pipeline of all forms will count towards the supply on a 1:1 ratio, with each bedroom being

counted as a single home. For scenario ii) new ratios are employed based on the type of NSC accommodation consistent with policy H1 which mirror those set out in the Government's Housing Delivery Test Rulebook. The following ratios are therefore used for scenario ii):
2.5:1 for student accommodation (with two and a half bedrooms being counted as a single home);
1:1 for accommodation for older people (C2 use class); 1.8:1 for all other net non-self-contained communal accommodation (with one point eight bedrooms being counted as a single home).

THE CALCULATION

To determine whether the authority has sufficient supply, the supply outputs are measured against the requirement using the following calculations.

Requirement inputs

$$A + B + C = HR$$

$$\frac{HR}{5} = AR$$

Where-

A = the Basic Housing Requirement for the next five years
B = Shortfall/Surplus to be carried forward
C = The appropriate Buffer
HR = cumulative 5 yr Housing Requirement
AR = Annualised Requirement

Supply inputs

$$D + E + F = TS$$

Where-

D = Deliverable Capacity on Large Sites
E = Small Sites Capacity
F = Non-conventional supply
TS = Total Supply over the 5 Years

$$\frac{TS}{HR} \times 100 = Percentage\ Performance$$

$$\frac{HR}{5} = AR\ (Annualised\ Requirement)$$

$$\frac{TS}{AR} = Supply\ in\ Years$$

THE RESULTS

Table 2.13 below will summarise the inputs and results for both scenarios. These figures will be populated in the 'Final' AMR, alongside commentary explaining the results

Table 2.13 – Five Year Housing Land Supply summary results

	Scenario i	**Scenario ii**
A – Basic Housing Requirement	6,485 (Borough)	10,785 *(LPA)*
B - Shortfall	TBC *(Borough)*	TBC *(LPA)*
C – Buffer at 5%	TBC	TBC
HR – Cumulative Requirement	TBC *(Borough)*	TBC *(LPA)*
D – Large Site Supply	TBC *(Borough)*	TBC *(LPA)*
E – Small Site Supply	303 *(Borough)*	424 *(LPA)*
F – NSC Supply	TBC *(Borough)*	TBC *(LPA)*
TS – Total Supply	TBC *(Borough)*	TBC *(LPA)*
Percentage Performance	TBC	TBC
Supply in Years	TBC	TBC

A detailed Five Year Land Supply position statement for scenario ii) will also be appended to the 'Final AMR' containing the full list of sites broken down by the categories described here.

Housing Trajectory

Purpose of trajectory and relationship to the five year housing land supply

As set out in the NPPF, LPAs are also required to identify a supply of sites/land beyond the initial 5 year period covered by a Five Year Housing Land Supply. As well as the need to demonstrate supply over the longer term, the exercise of preparing a trajectory assists authorities in establishing anticipated delivery rates, and is a key tool to track progress against longer term targets.

As with the Five Year Land Supply, a trajectory is prepared at the outset of the plan period, but should be updated regularly to track progress. As already noted above ideally once a plan target has been established this would define a fixed period to monitor over and a consistent level to measure against. For Ealing and other London authorities however, the targets are not a constant and have continued to evolve. For the Five Year Land Supply a range of scenarios have been examined from the perspective of different positions in time, and now looking forward. As the trajectory is very much a forward looking/predictive tool, such forecasting shouldn't just be limited to the supply/delivery inputs, but it should also be reflected through the targets too. For the trajectory a decision has been taken not to monitor from a fixed baseline, and instead it builds in and represents the most up to date understanding regarding the targets and assumptions which might apply over this period. Only one scenario is examined through the trajectory which builds on from scenario ii) of the 5 year land supply.

Methodology for preparing the trajectory

This section outlines the methodology employed, any assumptions used and broad ground rules.

Period covered

As prepared the trajectory covers a 24 year period, examining/forecasting activity between 2011/12 and 2034/35. The period between 2011/12 and 2019/20 is informed by historical datasets, of which 2014/15 – 2019/20 are categorised as the 'reporting years'. The 15 year period from 2020/21 – 2034/35 represents future years and is determined based on forecasting/projections.

Defining targets

Unlike the five year land supply where a range of alternative scenarios have been prepared reflecting different requirement targets, for the trajectory delivery is examined against a single set of targets. Whilst the targets do evolve over the trajectory period, performance is measured against a single target only for a given year.

Table 2.5 above defines which targets are employed in the trajectory for a given year. In summary the following sources are used:
2011/12 – 2014/15: Core Strategy 2012 (933)
2015/16 – 2018/19: FALP London Plan 2015 (1,297)
2019/20 – 2034/35: New London Plan 2021 (2,157)

With regard to the new London Plan target, this is expressed as a ten year target covering the period from 2019/20 – 2028/29. The GLA has deliberately removed reference to annualised targets in recognition of the fact that delivery may not occur evenly over the target period. In this regard it is also acknowledged that the new London Plan targets represent a considerable uplift on past/current targets for many authorities, and therefore it may take a number of years before authorities can step up and deliver at these levels. Whilst regard must be had to such issues, and it highlights the pitfalls of examining a single year figure in isolation, for the purpose of this exercise, it has been necessary to annualise the targets.

As the NLP target extends only to 2028/29, whilst the trajectory goes beyond this, it is necessary to determine what target should be applied to the later years of the trajectory (i.e. 2029/30 – 2034/35). To this end the NLP also advises that if a target is needed beyond the 10 year period, boroughs should draw on the 2017 SHLAA findings (which covers the period up to 2041). There is some logic to this approach, given that the capacity identified in the SHLAA for the 10 year period (phases 2 and 3) is the primary determinant of the target, it therefore should follow that capacity identified for later phasing periods would provide a sound basis for setting targets for later periods. There are however also some issues with this approach. As will be explained in more detail below, because of the default phasing assumptions employed by the GLA in the SHLAA, there is an uneven distribution of capacity across the SHLAA period, with the bulk of it being attributed to phases 2 and 3. In Ealing's case 74% of the overall capacity identified in the SHLAA has been assigned to phases 2 and 3 despite only relating to 42% of the overall time period covered by the SHLAA. Phases 4 and 5 account for only 12% and 4% of the overall identified capacity respectively despite covering a longer 12 year period. Were the Council to follow the new London Plan approach and model targets based

on the SHLAA results for the later periods, it would be setting targets in the region of 1,000 units per annum. Clearly this represents a significant reduction relative to the 10 year target (annualised) and the recent delivery levels, and therefore doesn't represent an appropriate approach. It has therefore been decided that for purpose of this exercise the Council will instead roll forward the new London Plan target for the later period of the trajectory. If or when better data becomes available this approach may be modified in future trajectories.

Accounting for past delivery

Although the trajectory is principally a forward looking tool, as with the 5 year land supply, it is necessary to look back and account for historical performance against the contemporaneous targets.

For the purpose of the trajectory this is presented as a running cumulative balance, representing the difference between actual/anticipated delivery and the target. To assist in understanding this, the Final AMR will contain a summary table which presents a rolling cumulative target for all years of the trajectory. Below this is a rolling cumulative supply figure for each of the years. Finally, the difference between the two is presented representing the running balance.

This balance is set at zero from the starting year of the trajectory, and no carry over (either in terms of a deficit of surplus) has been brought forward from the period prior to the trajectory period. Any deficit or surplus will therefore have accumulated during the period from 2011/12 – 2034/35. For past years (i.e. up to 2019/20) this running balance is derived from actual completions data obtained from the LDD. These figures are also consistent with the completion figures given in table 2.8 and 2.9 above (comprising conventional, non-conventional and vacants). As the completion records here are being compared against borough targets to determine the balance, borough completion figures are employed.

Unlike the 5 Year Land Supply, where a past deficit was carried forward and added to the base requirement, for the trajectory this cumulative balance is recorded separately, and therefore no adjustment is made to the target to account for the performance of previous delivery. Although captured independently in the trajectory, understanding the cumulative balance alongside the annual forecasts will be important, and will be covered in the analysis.

Supply/Delivery Inputs

The primary input into any Housing Trajectory are the annual completions (actual or forecasted). As these have to be comparable with the targets, housing completions are expressed as a net figure (i.e. losses of existing units are subtracted from the gains), and they capture conventional and non-conventional completions. The past figures also account for vacants, but this is omitted from the forecast figures as there is no effective way to accurately predict these.

For the past years (2011/12 – 2019/20), the figures reporting into the trajectory represent actual completions, and this data is derived from the LDD. Note that these are based on borough figures, with the exception of 2019/20 which is derived from LPA datasets only. Each year typically over summer the Council reviews the status of all live permissions, and records what activity has occurred

during the previous financial year, recording in particular whether schemes have started or completed. The results of this exercise feed into the LDD/Planning DataHub and inform the AMR. At the time of publication whilst it is noted that the financial year 2020/21 has now ended, and is therefore effectively a past year, pending the finalisation of the starts and completions exercise during 2021 the reported completion figures for 2020/21 are not currently known. For the purpose of the trajectory the year 2020/21 is therefore treated as a 'future year'.

For 'future years', covering the period from 2020/21 until 2034/35, annual delivery figures are estimated for each year. Note that only capacity from the LPA area is included. To assist with understanding the basis of this forecast, this future delivery capacity can be broken down into the following components, which have been defined to be exclusive to avoid double counting:

A - Conventional Large Sites Capacity (0.25 ha or greater)

i. The Pipeline: This includes permissions and prior approvals which have not started (extant), or started (under construction / partially implemented). Where a development scheme has been partially implemented, only the outstanding capacity yet to be delivered is accounted for. Furthermore, where there are multiple permissions for a development site, superseded units are not included in the assumed delivery to avoid double counting. Note that although the pipeline captures all live permissions up to the point of publication (December 2021), it is possible only to strip out units which have been completed by 31st March 2021. Until the starts and completions exercise is completed for 21/22, it may remain the case that a relatively small proportion of the capacity in the pipeline has already been completed.
ii. Schemes pending decision: This comprises capacity from applications which are live and currently being assessed or pending the signing of a legal agreement. Only schemes which are likely to be supportable are included in this category.
iii. Adopted Allocations: This comprises the estimated unimplemented conventional capacity from allocated sites. These sites derive from the 2013 Development Sites DPD, and small site allocations are omitted. To avoid double counting with the historical datasets and the pipeline, only unimplemented capacity which doesn't benefit from a planning permission is included.
iv. Emerging Allocations: The new Local Plan will be supported by a new set of site allocations. Whilst these allocations have yet to be formally tested, and other sites may be identified in the future, it is appropriate for these to inform future estimated delivery. Again to avoid double counting careful consideration has been given to ensure that any capacity accounted for in this category doesn't overlap with the other categories. In particular some of the emerging allocations overlap with the adopted allocations, and so this capacity is only recorded against one category. Typically where this has occurred, the emerging allocation has been taken to supersede the unimplemented adopted allocation, and so the adopted allocation is omitted.
v. Other large sites: This is a catch all category for any other large site which it is anticipated may be delivered over the trajectory period. Overtime it is possible that the schemes captured here will move into one of the other categories as their status changes.

Within the summary trajectory to be published in the Final AMR, only aggregated figures are presented by category. In the full trajectory to be appended to the final report, only sites which already benefit from a permission and are part of the pipeline are identifiable. Whilst all other sites

and their capacity are listed separately, they are not identified by name. This is in recognition of the fact that this exercise is a high level one, and is not a substitute for the detailed design and capacity work completed to support an application. The site estimates whilst informed are indicative and this information is not published so as not to prejudice the formal planning application process.

B – Conventional Small Site Capacity (smaller than 0.25 ha)
Unlike the large site element which is based on known sites (either permitted or otherwise), it would be impossible to attempt to comprehensively identify and estimate capacity for all small sites, and so future anticipated delivery from small sites is determined based on a fixed annual forecast/modelled figure which derives from the 2021 London Plan. This approach to dealing with small sites/windfall is entirely consistent with the NPPF/NPPG. For Ealing this small sites figure now stands at 424 units (annualised). Whilst this still represents a sizeable uplift on past small site completions, and some reservations remain regarding the methodology uses to derive this figure, it is appropriate and also necessary to employ the 2021 London Plan small site estimate for the forecast years of the trajectory. As with the target discussed above, whilst these figures relate only to a ten year period, it has been decided that this will be rolled forward for the duration of the trajectory period.

Therefore to avoid any double counting any capacity from actual known sites either in the form of a small site pipeline or as estimated capacities for small site allocations are to be stripped out and instead are replaced by this forecast/modelled figure.

C – Non-conventional Capacity
Again to be consistent with the methodology employed to define the 2021 London Plan target, the future capacity estimates for the NSC component are based on the approvals pipeline only. Whilst it is acknowledged that further approvals beyond the pipeline will almost certainly be secured over the life of the trajectory period, and therefore the pipeline may under-estimate future delivery rates, it is not feasible to attempt to identify where and when this may occur. As the NSC component is small relevant to the conventional supply, this limitation will only have a modest effect on the accuracy of the overall forecasting, and so no further adjustments are made to account for this.

As noted earlier in this report NSC accommodation is presently recorded in the LDD as a bedroom measure rather than a unit measure. In order to count the contribution of NSC accommodation to future capacity it is necessary to convert the bedroom measure into units, and the process of doing this varies overtime and by target.

For the forecast years in this trajectory, new ratios are employed based on the type of NSC accommodation consistent with policy H1 which mirror those set out in the Government's Housing Delivery Test Rulebook. The following ratios are therefore used:
2.5:1 for student accommodation (with two and a half bedrooms being counted as a single home); 1:1 for accommodation for older people (C2 use class); 1.8:1 for all other net non-self-contained communal accommodation (with one point eight bedrooms being counted as a single home).

It should be noted that these new ratios do in fact differ from the initial revised ratio (3:1) employed by the GLA when preparing the 2017 SHLAA, but all parties agree that it is appropriate to supersede these with the final revised ratios endorsed in the new London Plan (2021).

Note also that although 19/20 is not treated as a forecast year, the final revised ratios have been employed for that year only, as 19/20 is the base year for the new LP targets. All years prior to that will have been calculated using a 1:1 ratio.

Assigning capacity to future years

In compiling and estimating future delivery, a number of sources have been examined. The NPPG indicates that a trajectory should be informed by the HELAA/SHLAA. Alongside previous trajectories the 2017 London SHLAA has therefore provided a useful starting point in preparing this trajectory. Clearly some time has passed since the 2017 SHLAA was undertaken, and the planning status of individual sites will have changed in some cases. Some of the sites (capacity) will have been completed, and others will now have secured permission, both of which will have been captured through the completions and pipeline inputs, which have been extracted from the LDD. Like the SHLAA, the trajectory assigns capacity to future years, based on an estimate of when that capacity is likely to be delivered. In broad terms the approvals are assigned to the earlier phases, and once built out, in later phases that capacity will be substituted with that identified from allocations and other potential sites not yet benefitting from planning permission.

This is an area though where the trajectory most departs somewhat from the 2017 SHLAA. Covering a 24 year period until 2041, the SHLAA assigned the large site capacity over 5 phases. Only capacity assigned to phases 2 and 3 informed the London Plan target. In capacity terms these 2 phases accounted for 74% of overall capacity despite only relating to 42% of the overall time period covered by the SHLAA. The last two phases (4 and 5) whilst covering a longer 12 year period only accounted for 18% of the total identified capacity. Whilst it is acknowledged that it is much more challenging to predict what sites might be available in the longer term, and therefore the later phases of the SHLAA and trajectory may not represent the full picture, this factor alone doesn't fully explain the uneven distribution/bunching of capacity. One of the key factors influencing this are the default phasing assumptions employed by the GLA, which were engineered to ensure that the bulk of capacity is distributed into phases 2 and 3. No explanation was given for the phasing assumptions employed, and they appear to bear little relationship with historical trends, and are inconsistent with the definitions of deliverable and developable supply as defined by the NPPF. Phase 1 of the SHLAA represented a preliminary phase from the date of the study to the year the 2021 London Plan targets take effect (19/20). Phases 2 covers the first 5 years of the plan period, and represents a similar period to that covered by the five year land supply period. As expected whilst the approvals pipeline does account for a large proportion of the capacity in these phases, a considerable element of the capacity assigned to phases 2, and therefore the first five years, was identified from allocated and potential sites not benefitting from permissions, as per the phasing assumptions.

National policy and guidance emphasises the need to ensure that in demonstrating future supply and delivery, that this is realistic and can be robustly evidenced. To this end the NPPF was revised in 2019 to tighten up the definitions of deliverable and developable sites. As explained above in the context of the five year housing land supply and applying equally to the first 5 forecast years of a trajectory, only deliverable capacity should be assigned to this period. Without repeating what is covered above, in general only sites with full permission qualify as being deliverable. As explained in the guidance, there may be some exceptions where sites not benefitting from full permission might

also qualify, but these will be few and far between. In contrast the SHLAA has adopted a much less rigid approach, assigning many sites to this period which don't benefit from permissions, despite uncertainty around whether these sites will be delivered during this initial five year period. If the Council were to replicate the assumptions employed in the SHLAA, there is risk that we may fail to satisfy national policy.

In terms of the distribution of capacity over the SHLAA period, this is therefore considered to be unrealistic and overly optimistic. Whilst reservations were raised about this at the time and during the EIP into the 2021 London Plan, the large site component of the SHLAA, and the underpinning methodology, has remained intact and informs the new targets.

This presents a challenge for the Council, as its success in demonstrating that future delivery can meet the targets is to an extent dependent on being able to apply the same phasing assumptions employed in the SHLAA, despite their incompatibility with the national policy and guidance.

Notwithstanding this to provide a credible and robust trajectory it has been necessary to largely discount the default phasing assumptions and redistribute capacity in line with national guidance and informed by local knowledge.

For the first five forecast years (2020/21 – 2024/25) then only sites which qualify as 'deliverable' have been assigned to this period. The inputs here in relation to future delivery are identical to those contained in the five year land supply.

Sites (capacity) assigned to years 6-15 (2025/26 – 2034/35) of the trajectory meet the definition of 'developable' sites as defined in the NPPF as follows:
'To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.'

Whilst this definition of developable is somewhat looser than 'deliverable', to assign capacity in the trajectory to years 6 – 15 it is necessary to have sufficient confidence around the prospect and timing of that delivery, and it must be possible to evidence this as required. A range of factors have been considered in undertaking this exercise including:

- Site availability
- Land ownership and assembly considerations
- The planning status
- Any indicative phasing plans if available
- The status of any allocation
- Any site remediation or other necessary groundworks
- The timing of delivery of any supporting infrastructure
- The scale of the development opportunity and the likely build out rate that could be expected over time.

Unlike for the large site and NSC components whereby the process of assigning capacity is determined on a site-by-site basis, as the small site component has been derived from modelling rather than known sites it is not possible to attribute the capacity to the years in the same way. The

small site component has therefore been assigned equally and evenly to each forecast year. This is considered to be most appropriate approach in the circumstances, although in interpreting the results, regard should be had to the fact that delivery on small sites may inevitably fluctuate from year to year, and moreover as the predicted small site delivery figure represents an uplift on the historical delivery averages, it may take some time for delivery to step up to this level.

A headline trajectory and associated commentary will be included in the Final AMR Report. The detailed trajectory in spreadsheet form will also be appended to this report.

Housing Delivery – Affordable

Delivering more affordable homes is a key strategic objective of Ealing's Development Plan, and this section seeks to monitor progress against this policy priority.

Affordable housing (as per the NPPF Annex 2) is defined as 'housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers).

Over the reporting period a number of iterations of the London Plan have been in operation. The previous versions of the London Plan advised that boroughs should set a target in their Local Plan for the amount of affordable housing to be provided.

Ealing's Local Adopted Development (Core) Strategy (2012) (Policy 1.2a) sets out that 'at least 50% of the housing developed in the borough up to 2026 will be affordable housing'.

The current London Plan (2021) through policy H4 similarly sets a strategic target requiring that 50% of all new homes delivered across London should be genuinely affordable.

For the purpose of analysing delivery against these policy targets, affordable provision is measured as a percentage of conventional units only, and therefore omitting the non-conventional/Vacants components reported in earlier tables examining overall delivery. Small HMOs are also excluded from the conventional count. Net figures are used, with unit losses being deducted from the total. This measure of affordable housing provision is quite different from other non-planning measures of affordable housing, where delivery might be measured in gross terms and potentially include acquisitions of units by housing associations or transfers of stock post-completion. In addition different data sources and timeframes may be used, which again might explain the different results. Furthermore tenure changes are sometimes made after a permission has been given and captured through the legal agreement, and whilst these should typically be regularised through the planning process and subsequently captured in the LDD/DataHub, this isn't always the case. Tenure changes may also be made after completion and again these are not captured through reporting on the planning measures, but the non-planning measures/outputs may record these.

Tables 2.14 and 2.15 below outline a breakdown of conventional housing provision over the reporting period for permissions and completions respectively. Both absolute and percentage figures are given, with the percentage being measured as proportion of the overall conventional total. To provide more granular detail the affordable figure is given as an overall total, as well as being broken down into the two main tenure categories – a) Low cost rent, and b) intermediate.

Further analysis in respect of tenure split is addressed in the next section. Both Borough and LPA figures are given. Net affordable housing output can vary considerably from year to year, and so both tables also show average affordable housing output as a proportion of overall conventional housing provision over the five-year reporting period.

Table 2.14 – Net Conventional Permissions by tenure category (percentages of total net conventional permissions given in brackets)

Year		Category							
		Market		Low-Cost Rent		Intermediate		Total Affordable	
2014/15		1607	80.8%	87	4.4%	295	14.8%	382	19.2%
2015/16	Borough	1923	85.8%	-78	-3.5%	397	17.7%	319	14.2%
	LPA	1906	85.7%	-78	-3.5%	397	17.8%	319	14.3%
2016/17	Borough	3700	82.2%	278	6.2%	522	11.6%	800	17.8%
	LPA	3665	82.3%	268	6%	522	11.7%	790	17.7%
2017/18	Borough	3376	73.6%	186	4.1%	1022	22.3%	1208	26.3%
	LPA	3325	73.9%	186	4.1%	987	21.9%	1173	26.1%
2018/19	Borough	2947	92.6%	-446	-14%	682	21.4%	236	7.4%
	LPA	2927	92.5%	-446	-14.1%	682	21.6%	236	7.5%
TOTAL 2014-2019	*Borough*	*13553*	*82.1%*	*27*	*0.2%*	*2918*	*17.7%*	*2945*	*17.9%*
	LPA	*13430*	*82.2%*	*17*	*0.2%*	*2883*	*17.6%*	*2900*	*17.8%*

Table 2.15 – Net Conventional Completions by tenure category (percentages of total net conventional completions given in brackets)

Year		Category							
		Market		Low-Cost Rent		Intermediate		Total Affordable	
2014/15		770	91.1%	111	13.1%	-36	-4.2%	75	8.9 %
2015/16	Borough	826	77.8%	90	8.5%	145	13.7%	235	22.2%
	LPA	820	77.8%	90	8.5%	145	13.7%	235	22.2%
2016/17	Borough	911	73.2%	223	17.9%	110	8.9%	333	26.8%
	LPA	894	72.8%	223	18.2%	110	9%	333	27.2%
2017/18	Borough	1060	95%	-28	-2.5%	85	7.5%	57	5%
	LPA	896	97%	-51	-5%	77	8%	26	3%
2018/19	Borough	1236	70.4%	289	16.5%	231	13.1%	520	29.6%
	LPA	1213	70%	289	16.7%	231	13.3%	520	30%
TOTAL 2014-2019	*Borough*	*4803*	*79.7%*	*685*	*11.4%*	*535*	*8.9%*	*1220*	*20.3%*
	LPA	*4593*	*79.5%*	*662*	*11.4%*	*527*	*9.1%*	*1189*	*20.5%*

Both tables illustrate that affordable provision has fluctuated from year to year. This range is more pronounced in respect of completions, which may be the result of factors beyond the council's control.

Examining average delivery over the report period, total affordable housing provision in terms of permissions has averaged just under 20% of the total conventional supply of homes, with actual delivery (completions) being slightly higher with a 5 year average just in excess of 20%. This represents a significant shortfall when measured against the 50% strategic target. It is recognised that the appropriateness of a percentage target which is tied to an overall housing delivery output, which it is anticipated will continue to fluctuate and shift, may not be the best means of measuring

the Council's performance in respect of securing more affordable accommodation to meet need. Affordable housing need does not change in line with rising housing targets. This is illustrated for example in table 2.13 in respect of permission, whereby despite the high number of absolute affordable permissions in 2016/17 (800 units) relative to 2014/15 (382 units), as a percentage of overall conventional provision the percentage achieved was higher in 2014/15 (19.2% compared with 17.8% for 2016/17). In respect of future monitoring it may be appropriate to uncouple affordable targets from overall provision and measure absolute provision against absolute need figures.

Since the focus of this analysis is on the effectiveness of the suite of policies, one factor which may in part contribute to this underperformance is the threshold set through policy for triggering an affordable housing provision in new developments. Prohibited by national policy only major developments of 10 or more units trigger an affordable housing requirement at present. Locally and regionally this threshold is established through Development Management policy 3A and Policy H4 of the London Plan respectively. Whilst some affordable provision is secured through minor schemes, this tends to happen much less frequently as it is not mandated through policy. Based on the average proportion of units secured through minor and major schemes (which fluctuates from year to year), in order to achieve 50% overall it would necessary to secure around 60-70% affordable provision in major schemes to compensate for the lack of or limited provision on small sites.

A further factor contributing to this underperformance is the inability to secure affordable housing in schemes secured under permitted development rights.

As it stands then, within the current policy framework, it is only through major schemes where planning permission is needed that is it possible to increase the pipeline of affordable units.

An analysis of permissions secured through major developments only is prudent and provides the truest reflection of performance in respect of the implementation of policy 3A. Table 2.16 records the approved planning permissions for residential schemes in each of the reporting years grouped by tenure, as a proportion of the total net conventional units approved in major residential schemes (10 units or above).

Table 2.16 - Net Conventional Permissions in Major Applications by tenure (percentages of total net conventional permissions given in brackets).

Year		Category								
		Market		Low-Cost Rent		Intermediate		Total Affordable		Total Majors
2014/15 Borough/LPA		527	88%	111	18.5%	-39	-6.5%	72	12%	599
2015/16	Borough	559	70.6%	88	11.1%	145	18.3%	233	29.4%	792
	LPA	559	70.6%	88	11.1%	145	18.3%	233	29.4%	792
2016/17	Borough	580	64%	216	23.9%	110	12.1%	326	36%	906
	LPA	565	63.4%	216	24.3%	110	12.3%	326	36.6%	891
2017/18	Borough	628	91.6%	-26	-3.8%	84	12.2%	58	8.4%	686
	LPA	466	94.3%	-49	-9.9%	77	15.6%	28	5.7%	494
2018/19	Borough	876	62.7%	258	18.5%	262	18.8%	520	37.3%	1396
	LPA	855	62.2%	258	18.8%	262	19%	520	37.8%	1375

As expected table 2.16 shows that affordable provision is higher as a percentage measure when examining only units permitted through major developments. As a borough figure the average is around 27.6% which compares to 17.9% when examining majors and minors combined.

The definition of affordable housing as defined through the NPPF is broad, and what qualifies as affordable needs to be determined on a case by case basis having regard to a range of local factors and the scheme itself.

Overtime a range of affordable products/outputs have been brought to the market subject to varying levels of discount and eligibility criteria. To ensure that the right affordable provision is secured to match need, both the Local Plan and London Plan specify preferred tenure splits. Development Management policy 3A specifies a 60/40 split of social or affordable rented accommodation to intermediate provision. London Plan policy H6 sets its own preferred split, which also specifies which products within the tenure categories the Mayor is seeking to prioritise. Working within these existing policy requirements set locally and regionally the Council has also published an Affordable Housing Statement (October 2018) to provide clarity and guidance around its expectations in relation to affordable housing, pending the development of new policies in the forthcoming local plan.

There has been a tendency to date to set policy and guidance which is product based, and to monitor accordingly. From a monitoring perspective this approach creates issues, as the range of affordable products has continued to evolve. This is particularly true over the reporting period, with a number of new products (London Affordable Rent/London Living Rent) being introduced towards the latter half of the monitoring period. Where proposals replace existing older products with newer different products it is difficult to portray the nature of any change (gain or loss). In addition product/tenure names are sometimes used interchangeably and incorrectly, which has resulted in some units being incorrectly classified in the LDD. Recognising these issues for the purpose of this exercise the findings are presented at the tenure category level instead. Aligned with policy, two overarching affordable tenure categories are employed, with the following products being assigned to each:

a) Low Cost Rent
- Social Rent
- Affordable Rent (including London Affordable Rent

b) Intermediate
- London Living Rent
- Discount Market Rent
- Discount Market Sale
- Shared Ownership and London Shared Ownership

The analysis is then done at the tenure category level to allow for more meaningful comparisons between existing and proposed products. For example a proposal involving the replacement of 50 social rent units with 50 London Affordable Rent units, would be recorded as a change in product, but would be amount to no net change in respect of the Low Cost Rent tenure category.

It is recognised though that this approach is somewhat simplistic, but it provides a meaningful way to examine change over a period of time. In the longer term and informed by the emerging Local Plan, the determination of whether a unit qualifies as a genuinely affordable unit may instead be tied to an income based measure as distinct from a product as is currently the case, and therefore the approach to monitoring will need to change accordingly.

Tables 2.17 and 2.18 illustrate how effective the implementation of policy has been in securing the Council's preferred mix as outlined in policy 3A, and supporting guidance. It should be noted that the figures here represent a cumulative/aggregated position and therefore they are not indicative of the general performance of individual schemes in relation to securing the preferred split.

Table 2.17 - Net Conventional Affordable Permissions by tenure type (percentages of total net conventional affordable permissions given in brackets).

Year		Affordable Tenure Category					
		Low-Cost Rent		Intermediate		Total Affordable	
2014/15 Borough/LPA		87	**22.8%**	295	**77.2%**	382	**100%**
2015/16	Borough	-78	**-24%**	397	**124%**	319	**100%**
	LPA	-78	**-24%**	397	**124%**	319	**100%**
2016/17	Borough	278	**34.8%**	522	**65.3%**	800	**100%**
	LPA	268	**33.9%**	522	**66.1%**	790	**100%**
2017/18	Borough	186	**15.4%**	1022	**84.6%**	1208	**100%**
	LPA	186	**15.9%**	987	**84.1%**	1173	**100%**
2018/19	Borough	-446	**-189%**	682	**289%**	236	**100%**
	LPA	-446	**-189%**	682	**289%**	236	**100%**
TOTAL 2014-2019	***Borough***	*27*	***0.9%***	*2918*	***99.1%***	*2945*	***100%***
	LPA	*17*	***0.6%***	*2883*	***99.4%***	*2900*	***100%***

Table 2.18 – Net Conventional Affordable Completions by tenure type (percentages of total net conventional affordable completions given in brackets).

Year		Affordable Tenure Category					
		Low-Cost Rent		Intermediate		Total Affordable	
2014/15 Borough/LPA		111	**148%**	-36	**-48%**	75	**100%**
2015/16	Borough	90	**38.3%**	145	**61.7%**	235	**100%**
	LPA	90	**38.3%**	145	**61.7%**	235	**100%**
2016/17	Borough	223	**67%**	110	**33%**	333	**100%**
	LPA	223	**67%**	110	**33%**	333	**100%**
2017/18	Borough	-28	**-49%**	85	**149%**	57	**100%**
	LPA	-51	**-196%**	77	**296%**	26	**100%**
2018/19	Borough	289	**55.6%**	231	**44.4%**	520	**100%**
	LPA	289	**55.6%**	231	**44.4%**	520	**100%**
TOTAL 2014-2019	***Borough***	*685*	***56.1%***	*535*	***43.9%***	*1220*	***100%***
	LPA	*662*	***55.7%***	*527*	***44.3%***	*1189*	***100%***

The results in tables 2.17 and 2.18 demonstrate that the percentage split varies considerably from year to year. Cumulative net losses have been recorded for select years in respect of both tenure categories, and these have a significant bearing on the percentage split/ratio. In 2014/15 the

majority (77%) of affordable units permitted were categorised intermediate, yet in respect of completions the split overwhelmingly favoured low-cost rent. 2015/16 was similar in terms of permissions, however net affordable completions were over 60% intermediate, representing the reverse outcome as sought through policy. In 2016/17 the reverse split was also evident for approvals, but the preferred split was largely met in respect of completions. 2017/18 was low in both the completions and the approvals of the low-cost products, and intermediate housing prevailed in respect of the split. 2018/19 saw the largest delivery of all affordable units overall in terms of completions, and the split was almost equal (55/45) in respect of the completions output. In terms of approvals however in 2018/19, the split largely favoured intermediate products, arising as a result of a significant net loss of low-cost affordable units.

Examining the 5 year average figures, there is a significant difference between permissions and completions. In the case of approvals, the split was largely in favour of intermediate housing (99 to 1 percent). In contrast, and perhaps the more significant measure, the split was broadly equal for completions, slightly favouring Low-Cost Rent as per the preferred policy split.

Housing Delivery – Spatial Distribution

As set out in Chapter 1 of the Adopted Development Core Strategy (2013), the vision for the spatial distribution of residential development in Ealing is to harness opportunities for growth and development and promote improvement in appropriate locations. To this end the Development Strategy identified two 'Growth Corridors' - the "Uxbridge Road / Crossrail" and the "A40 / Park Royal" corridors. These two east-west corridors include Ealing's designated Town Centres, Park Royal Industrial Estate (the largest in Europe) and the five Crossrail stations. The strategy envisaged that in respect of housing delivery secured from large sites (defined as sites with a site area of 0.25ha or greater), that the overwhelming majority (99%) would occur within the two corridors.

The tables, charts and commentary below identify the level of development activity that has occurred over the 5 reporting years across both of the identified growth corridors in Ealing. Table 2.19 below outlines the absolute net numbers of housing units completed on large sites both within and outside the growth corridors. This analysis was carried out using the completion figures only.

On average cumulatively over the 5 reporting years, the Uxbridge Road corridor and A40 corridor accounted for 77% and 7% respectively, of all residential developments on large sites in terms of delivery (completions). Taken together the majority (84%) of large site residential delivery in the borough has occurred within the identified corridors. Whilst this distribution of delivery does broadly mirror that envisaged through the Core Strategy, with the main concentration of activity occurring within the corridors, the proportion of development on large sites occurring outside the corridors (16% compared to 1%) is of significance.

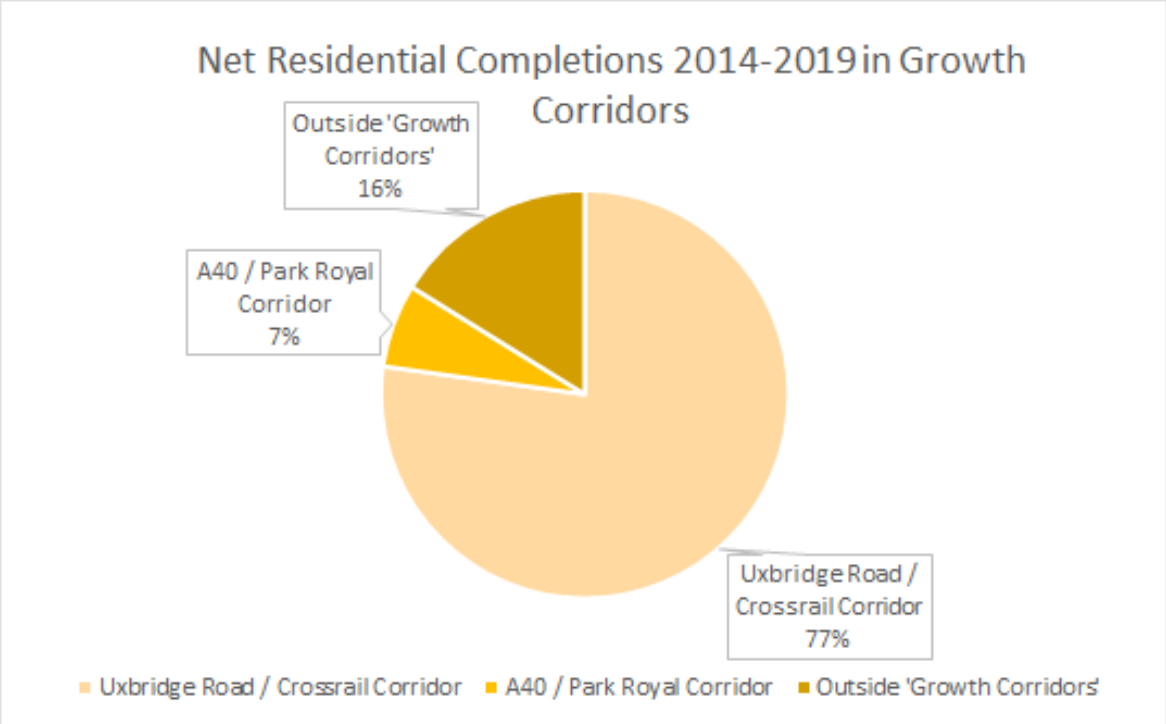
When looking at the years individually, there is also notable variance in the spatial distribution of the units delivered. The latest reporting year (FY 2018/19) saw the most distinctive trend in terms of spatial distribution, with the highest percentage of units of that year built in the A40 corridor (22%), as well as the lowest portion of the 5 years in the Uxbridge corridor (54%), which also made that year the lowest in terms of delivery within the two corridors combined (76%) and thus conversely the highest number of units delivered outside of the corridors – 24% of the units. That year also saw

the highest number of units on large sites out of all the 5 reporting years which may be a contributing factor.

Table 2.19 - Net Spatial distribution of housing units completed on large sites within the identified 'Growth Corridors' per financial year (percentage numbers given in brackets).

Years / Corridors	Uxbridge Road / Crossrail Corridor	A40 / Park Royal Corridor	Outside 'Growth Corridors'	TOTAL on Large Sites
FY 2014/15	409 (73%)	93 (17%)	56 (10%)	**558 (100%)**
FY 2015/16	519 (84%)	-15 (-2%)	114 (18%)	**618 (100%)**
FY 2016/17	559 (85%)	37 (6%)	58 (9%)	**654 (100%)**
FY 2017/18	441 (149%)	-168 (-57%)	22 (8%)	**295 (100%)**
FY 2018/19	669 (54%)	276 (22%)	294 (24%)	**1239 (100%)**
TOTALS	**2597 (77%)**	**223 (7%)**	**544 (16%)**	**3364 (100%)**

Figure 2.1 - Net Spatial distribution of housing units completed on large sites within the identified 'Growth Corridors' over reporting period (percentage numbers given in brackets).



Housing Delivery – Size/Type

Further analysis of completion data has also been undertaken to understand the mix of units being created in respect of unit size (using the number of bedrooms as the measure). Unlike other outputs reported in this chapter gross figures are used, as the number of bedrooms for homes lost or replaced is sometimes difficult to obtain, and the amount of missing data means it is not possible to calculate meaningful net figures. It should be noted too that the breakdown relates to conventional units only.

Tables 2.20 and 2.21 below show the number of conventional units delivered based on their size (measured by number of bedrooms) at borough and the LPA scales.

Table 2.20 - Gross Conventional Housing Completions (Borough) by number of bedrooms (percentage figures given in brackets).

Year/Number of bedrooms	1	2	3	4+	Total	% 3 of more
2014/2015	367 (36%)	446 (43%)	140 (14%)	80 (8%)	1033	21.30%
2015/2016	504 (40%)	516 (41%)	176 (14%)	68 (5%)	1264	19.30%
2016/2017	694 (41%)	686 (41%)	216 (13%)	79 (5%)	1675	17.61%
2017/2018	755 (43%)	761 (44%)	155 (9%)	69 (4%)	1740	12.87%
2018/2019	805 (38%)	835 (39%)	413 (19%)	76 (4%)	2129	22.97%

Table 2.21 - Gross Conventional Housing Completions (LPA) by number of bedrooms (percentage figures given in brackets).

Year/Number of bedrooms	1	2	3	4+	Total	% 3 of more
2014/2015	367 (36%)	446 (43%)	140 (14%)	80 (8%)	1033	21.30%
2015/2016	498 (40%)	514 (41%)	175 (14%)	68 (5%)	1255	19.36%
2016/2017	680 (41%)	683 (41%)	215 (13%)	79 (5%)	1657	17.74%
2017/2018	642 (42%)	683 (44%)	149 (10%)	69 (4%)	1543	14.13%
2018/2019	781 (37%)	835 (40%)	413 (20%)	76 (4%)	2105	23.23%

Over the 5 reporting years, the largest portion of the units delivered had been 1 and 2 bed units, accounting for approximately 80% year on year. 3-bedroom units saw a drop-in delivery in the 2017/18 Financial year, however increased immediately after in the following year, delivering the largest amount of 3 bed units over the 5 years in 2018/19 financial year. 4-bed units have consistently made up the smallest portion of the units delivered averaging just over 5% of the overall delivery in the area over the 5 reporting years.

When comparing the borough figures against the LPA figures, it is notable that there is very little difference in percentage terms, which indicates that delivery is generally consistent across the spatial coverage of Ealing as a borough and a local planning authority.

The key indicator to draw from here, however is the percentage of the conventional units completed in the 3+ bed category. 3 bed units and larger are considered to be optimal family accommodation, as such a consistent delivery of a good portion of units of a 3+ bedroom size is important to ensure that large families and households are provided for. For Ealing as a borough this figure has been on average at 18.8 per cent over the 5 years, and as an LPA the figure is slightly higher at 19.2 per cent. This indicates that about one fifth of all conventional dwellings completed in Ealing between 2014 and 2019 have been family sized 3+ bed dwellings. This figure is marginally short of the London-wide average of 22 per cent for 2018/19 and 20 per cent for 2017/18.

Further analysis has also been undertaken to understand the source of completions by development type. The LDD/DataHub records a number of development types for conventional housing supply; New Build, Conversions (change in the number of units in properties already in residential use – i.e. sub-division or de-conversion), Change of Use (e.g. a gain arising from a change of use from an employment use, or a loss arising from a change to a non-C3 use), Extensions (which create additional residential units), and hybrid development types.

Tables 2.22 and 2.23 show the breakdown of net conventional completions arising from the development types, at the borough and LPA level

Table 2.22 - Net Conventional Housing Completed units (Borough) by development type (percentage figures given in brackets).

Year/Development Type	New Build	Change of Use	Conversion	Extension	Part Ext/Conv	Unknown	Total
FY 2014/2015	617 (73%)	122 (14%)	96 (11%)	12 (1%)	0	-2	845
FY 2015/2016	833 (79%)	84 (8%)	118 (11%)	29 (3%)	0	-3	1061
FY 2016/2017	842 (68%)	208 (17%)	175 (14%)	27 (2%)	2 (<1%)	-10	1244
FY 2017/2018	604 (54%)	281 (25%)	181 (16%)	59 (5%)	5 (<1%)	-13	1117
FY 2018/2019	1049 (61%)	449 (26%)	191 (11%)	77 (4%)	0	-10	1756

Table 2.23 - Net Conventional Housing Completed units (LPA) by development type (percentage figures given in brackets).

Year/Development Type	New Build	Change of Use	Conversion	Extension	Part Ext/Conv	Unknown	Total
FY 2014/2015	617 (73%)	122 (14%)	96 (11%)	12 (1%)	0	-2	845
FY 2015/2016	833 (79%)	83 (8%)	115 (11%)	27 (3%)	0	-3	1055
FY 2016/2017	842 (68%)	193 (16%)	173 (14%)	27 (2%)	2 (<1%)	-10	1227
FY 2017/2018	453 (49%)	261 (28%)	178 (19%)	38 (4%)	5 (<1%)	-13	922
FY 2018/2019	1049 (61%)	428 (25%)	189 (11%)	77 (4%)	0	-10	1733

Over the 5 reporting years, new build homes made up the majority of Ealing's housing supply equating to an average of 67 per cent for the Borough and 66 per cent for the LPA of the net completions between 2014 and 2019. An average of 18 per cent (Borough and LPA) of the housing units were delivered through changes of use, and a further 12.5 per cent on average over the 5 years were delivered through residential conversions.

When comparing year on year, the data shows that there is a clear upward trend of change of use and conversions, while the new build units, albeit increasing steadily in absolute terms, have slightly reduced in the last 3 years. In part this may have arisen because of the extended permitted development rights. Conversions in absolute terms have almost doubled in 2018/19 when compared to 2014/15. Units provided through changes of use have increased even more dramatically – approximately four-fold in 2018/19 when compared to the 2014/15 completion figures.

Housing Delivery – Accessible Housing

Previously this section reported on the performance of developments in relation to Lifetime Homes and Wheelchair Accessible Standards. Following the Government's review of Housing Standards in 2015, it was no longer possible for LPAs to apply additional standards such as these which sit out-with the building regulations regime. The purpose of this review was to clearly delineate between LPA requirements and Building Regulations. In their place the Government introduced new mandatory minimum standards set through building regulations and defined higher optional standards. In order to apply these higher building control standards, Planning Authorities are required to adopt these through a local plan. For Ealing this was given effect through the adoption of the MALP London Plan in March 2016, although the policy in draft form was operating from October 2015.

Since 1 October 2015, this indicator (the accessibility of dwellings in London) has therefore been measured in relation to the design standards found in Part M Volume 1 of the Building Regulations:

- M4(1) Visitable dwellings
- M4(2) Accessible and adaptable dwellings
- M4(3) Wheelchair user dwellings (wheelchair accessible or wheelchair adaptable)

M4(1) is the basic standard for all new-build dwellings. In line with London Plan policy however, this AMR monitors compliance with the higher standards of M4(2) and M4(3).

The standards contained within Part M fully replaced accessible housing standards used previously, with M4(2) roughly equating to the old Lifetime Homes standard and M4(3) roughly equating to the previous Wheelchair Accessible Housing Standard.

As noted above M4(2) and M4(3) were 'optional' although have been 'switched on' through the adoption of the 2016 London Plan.

Unlike Lifetime Homes and Wheelchair Housing standards, the higher Building Regulations standards only apply to new-build dwellings. Furthermore, they are exclusive, meaning only one accessible housing standard can apply to a dwelling (previously a dwelling that met the Wheelchair Accessible Housing standard would also meet the Lifetime Homes standard). London Plan policy therefore

states that 90 percent of new-build dwellings should meet M4(2) and 10 percent M4(3), and accordingly performance is measured against this target.

It should be noted that analysis is done on approvals for new build dwelling only. Moreover, this analysis is based on an assessment at the decision-making stage (typically through the Design and Access Statement or Application form), and it should be noted that this indicator is not always fully reported and captured by the applicants. This is why there are a number of units each year which gain approval with no M4 status recorded.

Compliance with this aspect of dwellings is secured through planning conditions, which are then subsequently verified through the building control regime. At present there isn't capacity to comprehensively monitor this through the building control process, but for future monitoring reports we might be able to assess the presence of a condition as a means of determining what proportion of schemes are required to comply with the higher standards. As noted above M4(2) and M4(3) must be required by condition on the planning permission to be valid, so a commitment to meet these standards in the Design and Access statement or any other application document is not sufficient. In addition, details and reserved matters permissions following on from schemes designed prior to the adoption of the new standard are not always given a new condition related to accessibility.

Table 2.24 below shows compliance with M4(2) and M4(3) over the reporting period. The figures are based on gross approvals recorded/calculated at scheme level. This means that units could be counted twice where a revised application for part of a scheme is approved within the same year as the original permission (usually through details or reserved matters applications), and so caution should be taken if interpreting the absolute figures. Only schemes that are 100 per cent new build are included in this table. Split/hybrid schemes (part new-build and part conversion of existing buildings) are not taken into account. M4(2) and M4(3) replaced Lifetime Homes and Wheelchair Accessible Homes standards in London on all approvals granted from 01/10/2015 onwards. Although homes may be designed to the newer standards, they are only counted if compliance with these standards is conditioned in the decision notice.

Table 2.24 - New-build homes meeting accessible housing standards M4(2) and M4(3) approved in 2014 -2019.

Financial Year	Spatial Scale	Units M4(2) Compliant	% M4 (2) Compliant	Units M4(3) Compliant	% M4 (3) Compliant	M4 status not recorded	% where M4 status not recorded
14/15	*Borough = LPA*	1566	91.96%	165	9.69%	0	0* surplus of 28
15/16	*Borough*	2387	89.64%	266	9.99%	10	0.5%
15/16	*LPA*	2387	89.64%	266	9.99%	10	0.5%
16/17	*Borough*	3523	88.10%	383	9.58%	93	2.32%
16/17	*LPA*	3523	88.10%	383	9.58%	93	2.32%
17/18	*Borough*	3464	88.84%	371	9.52%	64	1.64%
17/18	*LPA*	3383	88.72%	366	9.60%	64	1.68%
18/19	*Borough*	2438	72.04%	263	7.77%	683	20.18%
18/19	*LPA*	2438	72.04%	263	7.77%	683	20.18%

Over the 5 reporting years, an average of 86.1 per cent per year (Borough and LPA) of all the units approved in Ealing have been compliant with M4(2) standards. While this falls just short of the 90 percent policy requirement, it is noted that each year the status of a number of schemes/units remains unknown as explained above. This is particularly evident during the fifth reporting year where a significant proportion of approved units had no M4 status recorded, and this has lowered the overall 5 year average.

In terms of Wheelchair User dwellings, the average of M4(3) compliant units approved in Ealing over the 5 reporting years, equates to an average of 9 percent annually, only marginally short of the 10% policy requirement.

If the taken together, an average of 95.1 per cent of all new-build units approved in Ealing over the monitoring period are achieving M4(2) or M4(3) standards compliance. Although this falls just short of the comprehensive policy compliance target of 100 percent, it is above the London-wide averages of 76.9 per cent in 2017/18 and 82.8 per cent in 2018/19.

Other Policy Indicators

Appeal Decisions

A survey of appeal decisions revealed that policies relating to housing both in the Development Strategy & Emerging Development Management DPD were frequently used. Note for the purpose of this analysis the appeal decision date determines which year it is reported against. A review of appeals upheld has been undertaken to establish whether such decisions highlight any shortfall with local policies or question their validity or application. Whilst Inspectors have attributed varying

weight to policies in their consideration of appeals, with one area of note being the application of the Mayor's minimum space standards for new residential developments, it is rare for them to challenge policies directly.

In the case of the Mayor's internal space standards, which are also adopted locally through the Development Management DPD, a number of Inspectors as illustrated in the appeal schemes below have taken a more relaxed stance permitting schemes which fall short of the internal space standards, and in some cases the qualifying height criteria. This is a worrying trend, particularly when the standards already represent minima, and were formalised in the Local Plan in 2012. It is acknowledged that this has been further complicated by latter changes which have taken place nationally and regionally. The Government introduced nationally described space standards in March 2015, which were given effect through the MALP iteration of the London Plan in March 2016. The Local Plan policy adheres to the same standards, but specifies a slightly higher ceiling height threshold level (of 2.5m) for determining usable floorspace for the purpose of the calculations. This compares with the minimum 2.3m height threshold specified in the Nationally Described Space Standard (and the London Plan), and the preferred 2.5m height standard recommended in the London Plan.

Table 2.25 – Appeals upheld where housing policies are queried

Monitoring Period	Application Ref	Address	Proposal (Summary)	Policy Considerations
2014-2015	PP/2013/5169	5 Broadway, Hanwell	Retention of first floor flat residential flat and proposed single storey rear extension.	Scheme below internal space standards
2015-2016	PP/2014/4287	144 Allenby Road, Southall	Use of the existing outbuilding in rear garden as a self-contained residential granny annex ancillary to main dwelling	Scheme below internal space standards
2015-2016	PP/2014/4931	Land rear of 8 Federal Road, Perivale	Demolition of existing outbuilding at the rear of the site and construction of dwellinghouse	Scheme below minimum internal space standards and the minimum amenity space standards.
2016-2017	163157FUL	146 Greenford Avenue, Hanwell	Conversion of roof space into one self-contained studio flat.	For the purpose of determining usable floorspace to be counted in any internal floorspace calculations the inspector has noted the lower ceiling threshold in the NDSS relative to the Local Plan standard and the preferred standard in the London Plan, but has nonetheless incorrectly applied a

Monitoring Period	Application Ref	Address	Proposal (Summary)	Policy Considerations
				lower standard than that set out in the NDSS.
2017-2018	163119FUL	47 Oldfield Lane South, Greenford	Internal alterations to convert flat over the shop to two flats.	Scheme below minimum internal floorspace standards. The Inspector permitted the inclusion of floorspace in the calculations below the minimum height thresholds in the NDSS, the London Plan and the Local Plan.
2017-18	180233FUL	67 Gonville Crescent, Northolt	Construction of two storey one bed dwellinghouse	Scheme below internal space standard set in the London Plan and Local Plan.

Departures

Applications which are not in line with the development plan are required to be formally advertised as departure applications in line with Article 13 of the Town & Country Planning (Development Management Procedure) Order 2010. An analysis of such applications is useful in illustrating where particular pressure points exist in relation to the implementation of the development plan policies. From an analysis of the 54 departure applications determined during the monitoring period 2014/15-2018/19, four applications were identified which depart from housing policy, as detailed in the table below. Note the decision date (and not the date it was advertised) determines which year it is reported against.

Table 2.26 – Departure applications which depart from housing policy

Monitoring Period application determined	Application Ref	Address	Proposal (Summary)	Departure Reason
2014/15	PP/2014/3775	The Study Centre, Compton Close	Demolition of former caretaker house to accommodate extension to study centre	Loss of residential unit
2016/17	161565FUL	92 Iveagh Avenue, NW10	Conversion of 6 flats to 5 flats	Loss of residential unit
2016/17	PP/2015/6790	Moulin House, 24-26 Mount Park Road	Demolition of former hostel to accommodate new residential block of 29 flats.	Loss of hostel accommodation (specialist housing)
2017/18	165092OPDFUL	Nash House	Change of use of student accommodation to shared living accommodation for	Loss of student accommodation (specialist housing)

Monitoring Period application determined	Application Ref	Address	Proposal (Summary)	Departure Reason
			students, employed graduates and young professionals.	

All the cases noted above involve the loss of some form of residential accommodation, which is generally resisted by local and regional policies given the high demand for housing. The scheme at the study centre at Compton Close involved the replacement of the caretaker house with a new two storey extension to the study centre. The extension accommodated much needed additional teaching/tuition capacity which needed to be relocated from another site. It is noted that the caretaker accommodation had not recently been occupied, was surplus to need, and given its siting wasn't suitable to revert to conventional residential accommodation. Accordingly, an exception was allowed.

In the case of 92 Iveagh Avenue, this property was originally a two-storey detached house, which had been subsequently split into 6 flats. This conversion was poor and the standard of the accommodation fell short of current requirements. Whilst the proposal to convert the property to 5 flats resulted in a net loss of 1 unit, the layout of the new units represented a significant improvement for the occupants, and the new units now satisfied the minimum internal space standards. The loss of a single unit was therefore considered to be outweighed by the improved quality of accommodation.

The scheme at Moulin House involved the loss of specialist hostel accommodation (formerly occupied by trainee ministers, and later by students). Whilst the policy resists the loss of specialist accommodation, in this case the proposal was replaced by a different form of residential accommodation, of which a proportion was affordable.

The scheme at Nash House in Park Royal involved an adjustment to the mix of accommodation on the site increasing those units accessible to young professionals/graduates and reducing the proportion originally restricted to students. This shift was considered to create a better balanced community and increased the availability of affordable accommodation to young workers/graduates.

3. Business

Introduction

This section of the monitor provides an overview of business development in the borough over the monitoring period, focusing specifically on various policy objectives set out in the Local Plan. Policy 1.1(c) of the Development Strategy seeks to promote business & enterprise by securing an adequate stock of employment land. Policy 1.1(a) sets a target of delivering 94,000 sq. m. of new office floorspace in the borough over the plan period. Policy 1.2(b) plans for the limited release of Strategic Industrial Land (SIL)/Locally Significant Industrial Sites (LSIS) over the plan period, although the 2021 London Plan (initially published December 2017) represents a shift in approach and now tasks Ealing with creating new capacity. Change can be measured both in terms of employment floorspace and the extent of areas formally protected/designated through the Local Plan.

Change in Employment Area and Policy Context

The 2015 London Industrial and Land Supply and Economy Study reports that Ealing has the largest industrial baseline of any borough in London, covering a total area of 567.7 ha. This baseline comprises both designated and non-designated sites. It should be noted however that a proportion of the designated areas also accommodate non-industrial uses. The West London Employment Land Study (2019) records the total industrial floorspace in Ealing as 2,027,000 sq. m.

In terms of designated sites (as defined through the 2012/13 Local Plan), Ealing has two types of industrial designations, Strategic Industrial Land (SIL) totalling 365 ha, and Locally Significant Industrial Sites (LSIS) totalling 70 ha. Together these designations form the main reservoir of land for industry and related activities within the borough and more widely in London. Their designation is necessary to ensure that London maintains a sufficient stock of good quality and affordable land and premises to meet the future needs of different types of industrial and related uses. It is also crucial that such areas exist as some uses can't be accommodated easily elsewhere.

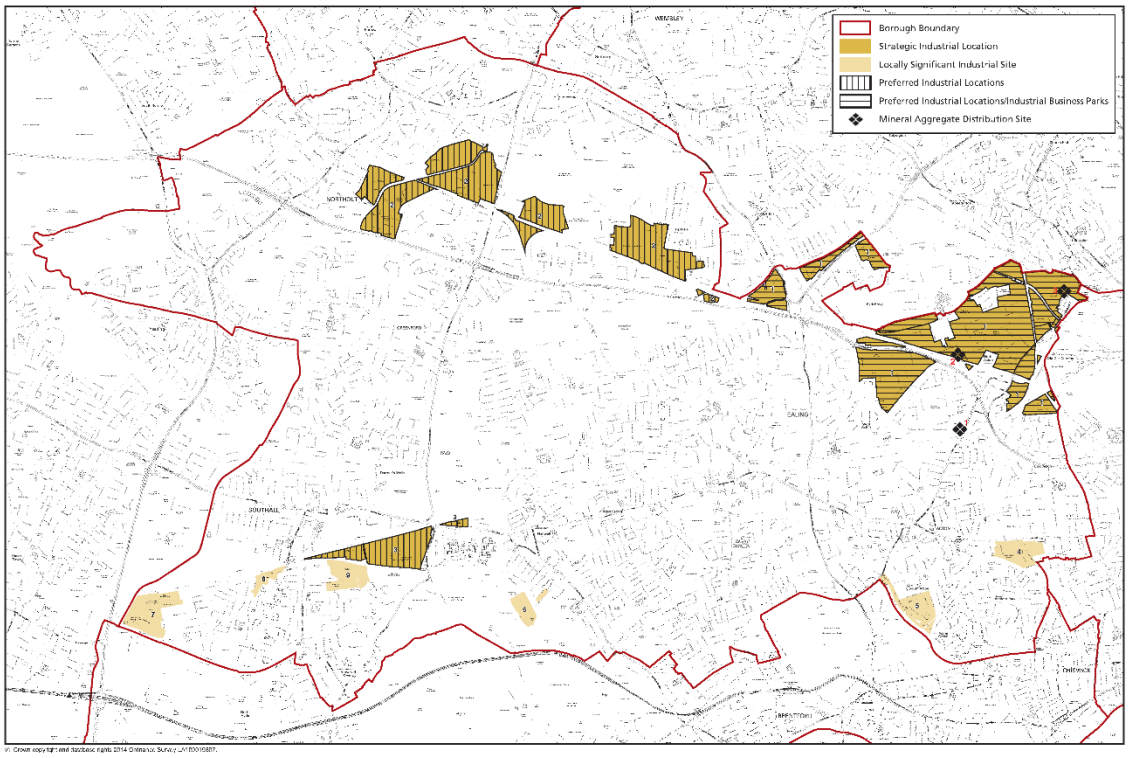
Based on the 2015 Baseline Study, approximately 16% of Ealing's baseline is located on non-designated sites. Local datasets indicate that it may be as high as 23%. In floorspace terms as distinct from site area, the West London Employment Study reports that 46% of the borough's total industrial floorspace is located on non-designated sites Theses non-designated sites are also significant and accordingly are managed through the application of criteria based policy (4A Development Management DPD). This policy sets a series of tests which must be satisfied if a change of use to a non-employment use is to be supported.

The Greater London Authority has worked collaboratively with boroughs to ensure that a sufficient stock of land and premises exist to meet need. Crucially the approach to managing industrial capacity is intended to be plan led as it requires strategic co-ordination and overview. The process has been underpinned by evidence prepared both regionally and locally, which has essentially sought to reconcile demand and supply. The current Local Plan and the previous London Plan (2016) were largely underpinned by evidence prepared between 2010-2012. On the supply side this evidence included the 2010 Industrial Baseline (URS Corporation, London's Industrial Baseline, LDA/GLA, 2010), and on the demand side the London Plan Employment projections from GLA Economics (GLA Economics Working Paper 51: Employment projections for London by sector and trend-based projections by borough, GLA, 2011) and the Industrial Land Demand and Release Benchmark Study.

In planning for future demand, allowance was also made for frictional vacancy, recognising that some vacant land is necessary for the market to operate smoothly. The GLA's SPG (Land for Industry and Transport) sets an optimum guideline frictional vacancy rate of 5% for core industrial land, and property industry benchmarks suggest as high as 8%. Whilst the SPG sought to reduce vacancy rates down to the guideline levels, it did not support a reduction below the guideline rate, as such levels might undermine the operation of the market and is also indicative that demand may have exceeded supply. With the exception of some central London Boroughs the latter was not envisaged to be an issue at the time of publication (2012). Moreover, in the context of an overall trend of declining demand for industrial land, it was considered that there was scope for some managed release. There are wide geographical variations in the demand and supply balance across London and its sub-regions, and so sub regional and borough benchmarks were set for release, as detailed in the Land for Industry and Transport Supplementary Planning Guidance (2012). Based on a sub-regional assessment Ealing alongside its West London Neighbouring boroughs was identified as having potential for 'limited transfer' of industrial sites. These benchmarks and broad groupings of release were intended to act as a starting point for more detailed local assessments of demand and supply in borough Employment Land Reviews (ELRs).

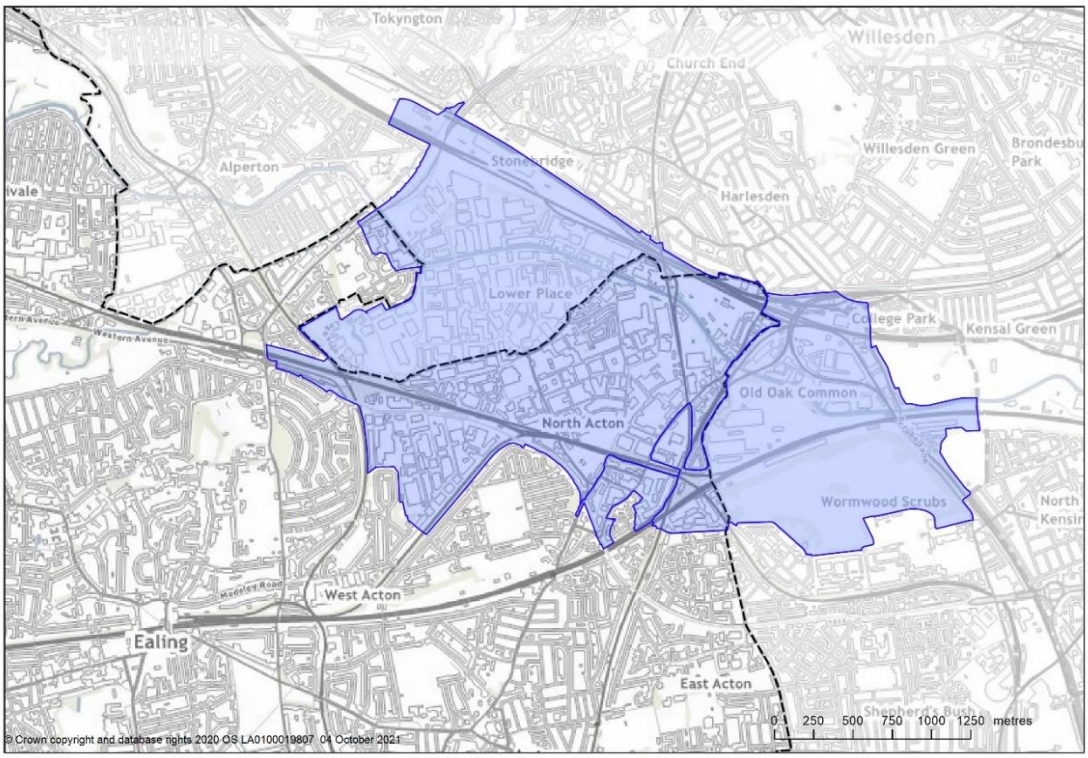
Completed in 2010, Ealing's ELR (Roger Tym & Partners, Ealing Employment Land Review, 2010), provides an assessment of current and future need until 2026, and similarly concluded that there was scope for limited release, finding that there was capacity for the release of 16 ha (net) of land. Local policy 1.2(a) of the Core Strategy identified how this release was to be managed, confirming that this transfer will be managed through the Development Sites Development Plan Document and Opportunity Area Planning Frameworks for Park Royal and Southall. A significant proportion of this release has now already been planned for following the preparation and adoption of the Development Sites DPD and Southall OAPF in December 2013 and July 2014 respectively. This process of phased release is also encouraged through the GLA's SPG - Land for Transport and Industry. Both the Development Sites DPD and the Southall OAPF have undergone extensive consultation and the DPD was the subject of an independent examination. The extent of the borough's SIL and LSIS areas and planned release were considered carefully during this examination. These changes in designation were adopted in December 2013 and is reported in the previous AMR (13/14). A breakdown of each designated area is contained in the Policies Map booklet (December 2013). It should be noted that no further changes have been made or proposed during this monitoring period in relation to the designated baseline.

Figure 3.1 - illustrates the extent of designated industrial areas currently in the borough as adopted in December 2013.



In April 2015, the OPDC became the Local Planning Authority for the north east corner of the borough and are currently preparing a Local Plan. This is of particular significance for industrial policy because this area, known as Park Royal, comprises the borough's largest single concentration of employment land, accounting for 42% (181 ha based on the OPDC's boundary) of the boroughs supply of designated land.

Figure 3.2 – OPDC boundary relative to Ealing Borough boundary



Whilst the above evidence and commentary supports and relates to the adopted development plans, more recent evidence has now been prepared which updates this position and underpins the policies and approach now taken through the new London Plan (2021) and will also underpin Ealing's emerging new Local Plan. Locally this evidence is also supplemented by a joint West London Employment Land Review, which was published in July 2019. The GLA have also published two significant studies. On the supply side they have published a 'London Industrial Land Supply & Economy Study' (AECOM, 2016). This study updates the 2010 industrial baseline and informs the new London Plan 2021. In part the study comprises a high level audit of employment activities, and it maps and measures the extent of these areas, which it compares with earlier baseline studies, in order to identify change/trends in London's industrial land supply. It also assesses the implications of a future restricted supply of land in London. The study identifies several key headline findings. Significantly the report identifies that the stock of vacant industrial land has continued to decrease over the past decade or more. The rate of vacant industrial land across London is now approaching the GLA's guideline frictional vacancy rate of 5% for core industrial land, and a fall in the actual vacancy levels below this rate will likely create difficulties for the operation of the market. Ealing itself has in fact already fallen below the optimal rate, with vacancy levels being reported in the study at 4.1%. Such low vacancy levels can impact on businesses ability to find space and affordable space. This is also indicative that the level and rate of loss has been excessive. The study confirms this situation recording an accelerated rate of release significantly above the GLA's Land for Industry and Transport benchmark rates of release. For London as a whole the trend rate of release between 2010 to 2015 is 105 ha per annum, compared with the SPG recommended rate of release of 37ha per annum. The five year target release for Ealing in the SPG is 6ha, whereas the actual release for the same period was 22.8ha. This disparity is significant and one of the highest in London.

Supplementing the supply study, the GLA have also published their demand study (CAG, London industrial Land Demand, GLA, June 2017). For Ealing this study has demonstrated that the decline of more traditional industrial activities has levelled off, and that demand for emerging sectors (logistics etc.) has grown. Ealing has the largest sub national market for logistics. Evidence suggests that this demand is not being met locally, as a result of constrained supply and rising rents. This imbalance between supply and demand is expected to continue, and the situation is particularly acute in Ealing. In response the study recommended that the GLA introduce a new benchmark release category – 'Provide Capacity', and it was recommended that Ealing along with only four other boroughs, who are also experiencing a positive net demand for industrial land, would move into this category. This is now reflected through the new London Plan.

As noted above Ealing alongside neighbouring boroughs in West London commissioned a new employment land study (ELR) which was finalised in 2019. For Ealing this study concluded that the borough has a net deficit of industrial provision of 1ha. This headline need obscures considerable churn in industrial use and demand which will see a c20ha loss of manufacturing uses slightly outweighed by around 21ha of new need for logistics and related uses. This, and the need to meet the unprecedented net increase in industrial needs overall imply a very great demand for industrial development to allow the intensification and reorganisation of the Borough's existing stock. Similarly, Ealing and the West London subregion experience suppressed industrial transactions due to a lack of available industrial premises, this does not imply a greater net need than the 1ha set out by the study but it has significant implications for the operation of the land market and the design of industrial policy.

This represents an unprecedented policy shift away from managing release, to creating additional capacity. Ealing therefore has no capacity for the release of industrial sites, whether they are designated or not. Industrial land supply is now more scarce relative to need than residential land, and existing industrial sites will be managed first and foremost for their capacity to provide industrial uses. Whilst the commentary above largely deals with capacity in terms of land/site area, it is recognised that opportunities to create new additional areas of industrial land will be limited, although will be pursued where possible. Emphasis is therefore placed on increasing capacity, through increasing industrial floorspace on existing sites. In order to achieve this objective the policy is clear that the borough should be planning for no net loss of industrial floorspace, and where appropriate and where opportunities present themselves and can be led by a plan, facilitate the intensification of existing sites, in order to secure additional capacity. Ealing will need to respond to this challenge through the application of London Plan policy and the development of new policies in an emerging Local Plan.

Change in Employment Floorspace

As noted above whilst there has been no change during this monitoring period in respect of the extent of designated areas, as identified through the industrial baseline study there has been significant losses in respect of the land area accommodating industrial activities. Whilst this baseline is currently measured in terms of land area, it does not provide comparative floorspace figures.

The West London Employment Land Study (2019) does provide a breakdown based on floorspace for 2018 only as detailed in the table 3.1 below.

Table 3.1 - Ealing existing floorspace supply (excluding OPDC) for 2018

SIL	**Total Floorspace (sq. m.)**	**% of total Ealing LPA supply**
Great Western	94,194	6%
Northolt, Greenford, Perivale	507,117	34%
LSIS	**Total Floorspace (sq. m.)**	**% of total Ealing LPA supply**
Bridge Road Industrial Estate	11,813	1%
International Trading Estate	84,684	6%
South Acton	28,549	2%
Southbridge Way	7,064	0.50%
The Vale	52,513	4%
Trumpers Way	9,076	1%
Non-Designation	**Total Floorspace (sq. m.)**	**% of total Ealing LPA supply**
Non-designated sites	677,325	46%
Total	**Total Floorspace (sq. m.)**	**% of total Ealing LPA supply**
	1,472,335	100%

Although it has not been possible to establish a floorspace baseline for all reporting years there is still value in reporting on gains or losses in floorspace occurring during the year in order to understand any trends. Monitoring change in respect of employment floorspace permitted or completed through the development process can represent a useful measure of the effectiveness of policies in protecting the existing stock of employment uses and going forward in facilitating the delivery of new capacity (through intensification) as promoted through the new London Plan.

For future AMRs, considering the emerging policy target of providing capacity, it will be necessary to monitor how many schemes permitted or completed achieve industrial intensification, and what level of intensification is secured. The industrial potential of a site is generally measured as being a 65% plot ratio, or the existing level of industrial floorspace, whichever is greater. Successful intensification is therefore a proposal which meets or exceeds the figure while still providing appropriate access and yard space. In future AMRs the council will therefore attempt to record how many schemes succeed in achieving intensification when measured against this criteria, and by how much, in terms of an uplift in floorspace above the minimum requirement.

Change in employment floorspace by use class for each year covered by this Monitor is detailed below. It should be noted that, with the exception of 2014/15, the floorspace figures and analysis below excludes development proposed/delivered within that part of the borough (principally Park Royal) now covered by the Old Oak and Park Royal Development Corporation (OPDC). Whilst Ealing does still input monitoring information into the LDD/DataHub for delegated schemes (applications which the OPDC has delegated to Ealing LPA to determine), this does not represent a full picture.

Moreover, the OPDC are now responsible for reporting on development progress within its own area, and the analysis below for the periods from 2015/16 onwards does not account for and omits development proposed or delivered in that part of the borough. This is of particular significance in relation to this chapter, which principally measures change in B class uses, as a significant proportion of the existing baseline of such uses are currently located within Park Royal. Accordingly, a significant proportion of the change in floorspace arising in the borough in relation to these use classes (in terms of losses and gains) will have occurred beyond the Ealing LPA area, and as a consequence the results below are not necessarily representative of the borough position, and moreover may not be comparable with analysis undertaken in previous years. The figures below represent net figures, accounting for both losses and gains.

Recent changes to the Use Classes Order (which came into effect on the 1st September 2020), which create a new commercial use class E (absorbing class B1 and other non business classes), and subsequent (1st August 2021) changes to the General Permitted Development Order (Class MA) which permit the change of use to residential from all uses within this class, will make it much more difficult to monitor and manage changes in future years.

2014/15

In respect of permissions, table 3.2 below indicates change in employment floorspace during the year. As with previous years, whilst some new employment floorspace has been permitted during the year, this has been offset by some significant losses. If implemented these permissions would give rise to a net loss of 70,901 sq. m. of floorspace. The most significant losses occur to offices (B1a). Some modest gains have been approved in relation to B2 and B8 uses.

Table 3.2 - Indicative changes in employment 2014/15

Use	B1a	B1b	B1c	B1	B2	B8	Total
Net Floorspace (sq. m.)	-76,169	-66	1,031	-75,204	3,995	308	-70,901

With regard to completions table 3.3 illustrates that total net completions have resulted in a net loss of 6,543 sq. m. of employment floorspace. This loss represents a marked change on the 2013/14 figures of a net gain of 10,815 sq. m. This change can be attributed to losses in offices and B8 floorspace. It is noteworthy that whilst there has been losses in office space overall, these losses are considerably less than those permitted, which suggests that perhaps not all permissions/prior approvals are being implemented.

Table 3.3 - Change in employment floorspace developed 2014-15

Use	B1a	B1b	B1c	B1	B2	B8	Total
Net Floorspace (sq. m.)	-4,263	677	3,393	-193	-1,506	-4,844	-6,543

Whilst a total of 7,366 sq. m. of new office space was created during this monitoring period, this was also offset by considerable losses amounting to 11,629 sq. m. This is likely to compromise the target for new office provision as set out in policy 1.1(a).

2015/16

In respect of permissions, table 3.4 below indicates change in employment floorspace during the year. As with previous years, whilst some new employment floorspace has been permitted during the year, this has been offset by some significant losses. If implemented these permissions would give rise to a net loss of 35,455 sq. m. of floorspace. The most significant losses will occur to offices (B1a). Whilst there have been some modest net gains in B2 and B8 floorspace, this falls well short of compensating for the large losses approved to B1a uses. It should be borne in mind however, that the main concentrations of B2 and B8 uses (existing and proposed) will be found in borough SIL/LSIS areas, including specifically Park Royal, and that permissions in this area neither exacerbate or counteract such changes.

Table 3.4 - Indicative changes in employment 2015/16

Use	B1a	B1b	B1c	B1	B2	B8	Total
Net Floorspace (sq. m.)	-42,016	340	-89	-41,765	2,750	3,560	-35,455

With regard to completions, table 3.5 show total completions have resulted in a net loss of 14,776 sq. m. of employment floorspace. This represents an increase on total losses recorded from the previous year. The main losses occurring have been to B1a use class.

Table 3.5 - Change in employment floorspace developed 2015-16

Use	B1a	B1b	B1c	B1	B2	B8	Total
Net floorspace (sq. m.)	-12,391	58	-6,724	-19,057	4,129	152	-14,776

Whilst a total of 1,425 sq. m. of new office space was created during this monitoring period, this was also offset by considerable losses amounting to 13,816 sq. m. It is noteworthy that whilst there has been losses in office space overall, these losses are considerably less than those permitted, which suggests that perhaps not all permissions/prior approvals are being implemented. As for the previous year this is likely to compromise the target for new office provision as set out in policy 1.1(a).

2016/17

In respect of permissions, table 3.6 below indicates change in employment floorspace during the year. As with previous years, whilst some new employment floorspace has been permitted during the year, this has been offset by some significant losses. It is noteworthy however that whilst such approved losses are considerable they are considerably less than in previous years. Although still constituting the most significant area of loss by use class, losses in office space are less than in previous years. It would appear that losses in B1a are slowing somewhat perhaps because most of the more straightforward opportunities for change of use have already been established. It is also worth noting that there has been a modest net gain in B2 floorspace.

Table 3.6 - Indicative changes in employment 2016/17

Use	B1a	B1b	B1c	B1	B2	B8	Total
Net Floorspace (sq. m.)	-13,399	1,198	-1,618	-13,819	2,019	-2,127	-13,927

With regard to completions table 3.7 illustrates that total net completions have resulted in a net loss of -6,979 sq. m. of employment floorspace. This represents a decrease on total losses recorded last year. This has principally arisen because of net losses in office space.

Table 3.7 - Change in employment floorspace developed 2016-17

Use	B1a	B1b	B1c	B1	B2	B8	Total
Net floorspace (sq. m.)	-9,094	-314	-39	-9,447	614	1,854	-6,979

Whilst a total of 2,641 sq. m. of new office space was created during this monitoring period, this was also offset by considerable losses amounting to 11,947 sq. m. It is noteworthy that whilst there has been losses in office space overall, these losses are less than those permitted previously, which suggests that perhaps not all permissions/prior approvals are being implemented.

2017/18

In respect of permissions, table 3.8 below indicates change in employment floorspace during the year. As with previous years, whilst some new employment floorspace has been permitted during the year, this has been offset by some significant losses. If implemented these permissions would give rise to a net loss of 75,098 sq. m. of floorspace, the most significant approved losses in recent years. The most significant losses will occur to offices (B1a). This significant spike in loss largely arises from a single scheme (the former GSK site in Greenford), and may not therefore be representative of longer term trends, which seem to show a gradual slow down of losses in recent years. Whilst there have been a small net gains in B2 floorspace, this falls well short of compensating for the large losses approved in relation to B1a uses.

Table 3.8 - Indicative changes in employment 2017/18

Use	B1a	B1b	B1c	B1	B2	B8	Total
Net Floorspace (sq. m.)	-70,468	100	-1,540	-71,908	878	-4,068	-75,098

With regard to completions table 3.9 illustrates that total net completions have resulted in a net loss of 17,698 sq. m. of employment floorspace. This represents an increase on total losses recorded last year. The main losses occurring have been within the B8 and B1a use class.

Table 3.9 - Change in employment floorspace developed 2017-18

Use	B1a	B1b	B1c	B1	B2	B8	Total

Net floorspace (sq. m.)	-11,669	-742	4,482	-7,929	175	-9,944	-17,698

Whilst a total of 641 sq. m. of new office space was created during this monitoring period, this was also offset by considerable losses amounting to 12,310 sq. m. It is noteworthy that whilst there has been losses in office space overall, these losses are considerably less than those permitted, which suggests that perhaps not all permissions/prior approvals are being implemented. As for the previous year this is likely to compromise the council's ability to meet the target for new office provision as set out in policy 1.1(a).

2018/19

In respect of permissions, table 3.10 below indicates change in employment floorspace during the year. As with all previous years, whilst some new B class employment floospace has been approved during the year, any gains have been offset by more significant losses. Whilst aggregated approvals represent a loss (-15,732 sq. m. of floorspace), the total recorded losses are lower than for 3 of the previous 4 years. It is notable that losses from B1(a) (office) space is considerably lower than in previous years, a sign perhaps that the more straighforward opportunities for conversion of office to residential under permitted development rights are depleting. More concerning however is the record loss (as approved) in B2 floorspace (-12,888), although these losses are limited to 5 schemes only, and some of the bigger losses (by floor area) have been offset by gains in B8 space (i.e. the B2 space has been converted to or replaced with B8 space). This is also reflected in the B8 net total, representing the largest yearly gain in this sector over the 5 reporting years.

Table 3.10 - Indicative changes in employment 2018/19

Use	**B1a**	**B1b**	**B1c**	**B1**	**B2**	**B8**	**Total**
Net Floorspace (sq. m.)	-13,307	1,464	486	-11,357	-12,888	8,513	-15,732

With regard to completions table 3.11 illustrates that total net completions have resulted in a net loss of 33,045 sq. m. of employment floorspace, the largest loss of any of the five reporting years. The main losses have occurred within the B1a (office) use class, and in fact in respect of change in B1(a) floorspace, the change in this year (-30,847) represents the single largest loss of any of the reporting years. At this point it is difficult to know if this represents an ongoing trend, but it should be noted that in respect of approvals (i.e. the future pipeline), B1(a) losses have reduced in 2018/19. Changes in relation to B2 and B8 space have been very modest for this year.

Table 3.11 - Change in employment floorspace developed 2018/19

Use	**B1a**	**B1b**	**B1c**	**B1**	**B2**	**B8**	**Total**
Net floorspace (sq. m.)	-30,847	100	-1,397	-32,144	11	-912	-33,045

Despite 18/19 recording the largest overall losses (based on completions) for B1(a) office space, the total combined losses (-68,264) recorded for B1(a) over the five reporting years, is considerably

lower than the combined total for approvals (-215,359). The same is true when looking at all business sectors, with completed losses proportionally representing only about 37% of approvals, indicating perhaps that not all approvals are being built out.

Table 3.12 - Indicative changes in employment (all reporting years in sq. m.)

Use/Year	B1a	B1b	B1c	B1	B2	B8	Total
2014/15	-76,169	-66	1,031	-75,204	3,995	308	-70,901
2015/16	-42,016	340	-89	-41,765	2,750	3,560	-35,455
2016/17	-13,399	1,198	-1,618	-13,819	2,019	-2,127	-13,927
2017/18	-70,468	100	-1,540	-71,908	878	-4,068	-75,098
2018/19	-13,307	1,464	486	-11,357	-12,888	8,513	-15,732
Total	-215,359	3036	-1,730	-214,053	-3,246	6186	-211,113

Table 3.13 - Change in employment floorspace developed (all reporting years in sq. m.)

Use/Year	B1a	B1b	B1c	B1	B2	B8	Total
2014/15	-4,263	677	3,393	-193	-1,506	-4,844	-6,543
2015/16	-12,391	58	-6,724	-19,057	4,129	152	-14,776
2016/17	-9,094	-314	-39	-9,447	614	1,854	-6,979
2017/18	-11,669	-742	4,482	-7,929	175	-9,944	-17,698
2018/19	-30,847	100	-1,397	-32,144	11	-912	-33,045
Total	-68,264	-221	-285	-68770	3,423	-13,694	-79,041

Prior Approval Notifications

The Town and Country Planning (General Permitted Development) Order 2015 and amendments (2016), permits the right to change the use of premises in B1(a) office use to a C3 use without obtaining planning consent (Class O – previously Class J). Prior to the commencement of development however applicants must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required with regards to:

- Potential transport and highways impacts of the development
- Contamination risks on the site
- Flooding risks on the site
- impacts of noise from commercial premises on the intended occupiers of the development

Approvals

Table 3.14 below summarises the number of schemes approved and B1(a) floorspace lost (if implemented) over the monitoring period. Table 3.15 also records actual losses from completions occurring during the same period. With the exception of 2014/15, these figures exclude schemes falling within the OPDC's demise of the borough. It should in any event be noted that since the 22nd September 2017 an Article 4 Direction has come into effect removing such permitted development rights from the OPDC's area. In terms of the number of schemes approved, it is noteworthy that these have tailed off somewhat in the later years of the monitoring period, perhaps because the less constrained opportunities are depleting, although in terms of floor area the loss has been fairly

consistent. In terms of the amount of floorspace lost it is evident that this is typically considerably higher for permissions than completions. This is unsurprising as not all prior approvals will be implemented, although it should be recognised that having established the principle of loss, some applicants are choosing to progress such schemes in a different form (perhaps as redevelopment) through full applications, and so in such incidences the loss may still have occurred. The figures for 18/19 are notable as whilst the number of schemes completed is low, one scheme alone contributed to a loss of 15,236 sq. m (PAN/2015/5736 – Kellogg Tower).

Table 3.14 – Prior approval schemes (B1a to C3) permitted

Year	Number of schemes approved	B1(a) floorspace lost if implemented (sq. m.) - gross
2014/15	37	14,798
2015/16	16	24,719
2016/17	16	7,376
2017/18	8	15,977
2018/19	14	15,206

Table 3.15 – Prior approval schemes (B1a to C3) completed

Year	Number of schemes implemented	B1(a) floorspace lost (sq. m.) - gross
2014/15	6	1,645
2015/16	1	110
2016/17	9	4,596
2017/18	24	6,644
2018/19	5	17,825

Separate but more limited provisions did exist over the reporting period through the General Permitted Development Order permitting change of use from B1(c) (light industrial) and B8 (storage/distribution) (classes PA and P respectively). Monitoring records indicate that such provisions were used much less frequently, although this may be a reflection of the fact that these provisions were introduced later. With respect of class PA (light industrial to residential) one scheme (181508PAOR) was approved and completed over the reporting period resulting in a loss of 322 sq. m. of B1(c) floorspace. In the case of class P which permitted change of use from B8 to residential, two schemes (178269PRDIS and 181064PRDIS) were recorded over the period, which if implemented would result in a loss of 454 sq. m. and 340 sq. m. respectively. Class P and PA were time limited permitted development rights, and expired on the 10th June 2019, and 30th September 2020 respectively. Off the back of recent changes to the Use Classes Order (taking effect from 1st September 2020), which involved the creation of a new Commercial, Business and Service Class (Class E) which subsumed certain A classes, B1 and D classes, further changes to the GPDO (class MA) have been made, which came into force from the 1st August 2021, to enable the residential conversion of all Class E uses including those formerly classified as B1.

Policy Indicators

Appeal Decisions

A survey of appeal decisions revealed that policies relating to business/employment uses in the Core Strategy and Development Management DPDs were frequently used. A review of appeals upheld has been undertaken to establish whether such decisions highlight any shortfall with local employment policies, or question their validity. Over the five years monitored, only one appeal decision was identified of significance in relation to this policy area. During 2014/15 an appeal (PP/2014/1474) was allowed for the change of use of office space to form a single flat. The applicant failed to satisfy the tests for release as outlined in policy DM policy 4A. The Inspector allowed the appeal on the basis that the proposal would not result in the total loss of office space on the site, but rather it would be replaced with a smaller but still viable office use. In addition he also attached weight to the 'fallback position', whereby the appellant could pursue a similar scheme utilising its permitted development rights. This is a disappointing decision, and it highlights the need to robustly apply local policies, and to emphasise these in appeal statements.

Departures

Applications which are not in line with the development plan are required to be formally advertised as departure applications in line with Article 13 of the Town & Country Planning (Development Management Procedure) Order 2010. In addition to those applications formally advertised as departures, there were a handful of other applications which were deemed to be departures which are not formally advertised. An analysis of such applications is useful in illustrating where particular pressure points exist in relation to the implementation of the development plan policies.

2014/2015

With regard to permissions granted given during the year, 14 applications were formally advertised as departures. Four of these applications were considered to depart from employment policies.

Table 3.16 – Departure applications permitted in 2014/15

Application Ref	Address	Proposal (Summary)	Departure Reason
PP/2013/1750	2 Rubastic Road, Southall	Replacement of light industrial use with builders merchant and distribution warehouse and trade counter (B8 and ancillary A1)	The introduction of (potentially) a non-conforming use in LSIS
PP/2013/5688	111 Uxbridge Road, Ealing	Demolition of office building with 84 bed hotel	Loss of office space and contrary to site allocation
PP/2014/0357	Cambridge House, Cambridge Road, Hanwell	Change of use of vacant office building to a childrens nursery at ground floor and conversion of upper floors to provide 9 residential units	Loss of employment space
P/2014/0276	Dawley House, 91-95 Uxbridge Road, Ealing	Demolition of existing office building and construction of a 12 storey aparthotel	Loss of office space and contrary to site allocation

These schemes involved development on both designated and non-designated land. One scheme (Rubastic Way) involved the replacement of a B1(c) use with a builders merchants incorporating a trade counter. In so far as the sales use is ancillary to the main storage/distribution activities, which the applicant demonstrated that it would be, such activities do qualify as conforming uses in LSIS. Two of the applications (111 Uxbridge Road and Dawley House) involved the loss of office space in the 'Office Corridor'. Both sites are covered by site allocations, which support their redevelopment to support additional office provision. Both schemes involved the creation of hotels which departs from policy. An exception was made in both instances, because at the time of consideration, the evidence was showing that take up of office space was low in the area. Moreover, given their town centre location, as an alternative to office space, hotel uses were deemed to be appropriate. A further scheme at Cambridge Yard in Hanwell was also allowed involving the replacement of newly completed office accommodation. Whilst attempting to market the site as offices for some time, the applicant presented evidence to demonstrate that there had been no interest to occupy the site as offices. Accordingly, an exception was allowed.

2015/2016

With regard to permissions granted during the year, 11 applications (excluding those falling within the OPDC's area – 12 if included) were formally advertised as departures, although only one of these applications involved a departure from employment policies.

Table 3.17 – Departure applications permitted in 2015/16

Application Ref	Address	Proposal (Summary)	Departure Reason
PP/2015/5503	Stewkley House, 2 Wadsworth Road, Perivale	Temporary change of use from a factory (B2 use class) to a temple with community centre (D1)	The introduction of a non-conforming use in SIL

A proposal at Stewkley House in Perivale involved the partial temporary loss of B2 space. An exception was permitted here as the applicant had already secured permission to redevelop their original site in Greenford, and temporary alternative accommodation was being sought in the interim for the duration of the build programme of their existing site.

2016/2017

With regard to permissions granted given during the year, 15 applications were formally advertised as departures, although only one of these applications was a departure from employment policies.

Table 3.18 – Departure applications permitted in 2016/17

Application Ref	Address	Proposal (Summary)	Departure Reason
PP/2015/1031	109 Uxbridge Road, Ealing	Demolition of existing office building and replacement with 97 bed hotel	Loss of office space and contrary to site allocation

As for two previous approvals in 2014/15 this proposal involved the loss of office space in the Office Corridor, and was contrary to the site allocation which supported additional office provision. Similarly, an exception was made, because at the time of consideration, the evidence was showing that the office market had slowed down, and a hotel was considered to be a suitable alternative town centre use.

2017/2018

With regard to permissions granted during the year, 5 applications (excluding the OPDC's area – 6 if included) were formally advertised as departures, although only one of these applications was a departure from employment policies.

Table 3.19 – Departure applications permitted in 2017/18

Application Ref	Address	Proposal (Summary)	Departure Reason
163348OUT	Sheraton Business Centre, Wadsworth Road, Perivale	Construction of 33 business units for a range of B class uses	The introduction in part of non-conforming use (B1a) in SIL.

In the case of Sheraton Business Centre the proposal involved the re-introduction of standalone office use in part. Whilst ancillary office accommodation is typically deemed to be a compatible use in SIL, standalone offices are not supported by the policy. Nonetheless this only constituted a small element of the overall activities (most of which are conforming) to be accommodated at the site. Moreover, these non-conforming uses were being re-accommodated back on the site, as they had previously occupied this space prior to a fire in 2015.

2018/2019

With regard to permissions granted during the year, 7 applications (excluding the OPDC's area) were formally advertised as departures, although none of these were considered to depart from employment policies.

4.Town Centres

Introduction

This chapter of the monitor provides an overview on the development of designated Town Centres within the borough over the monitoring period 2014-19, focusing specifically on various policy objectives set out in the Local Plan.

There are 5 designated Town centres in Ealing, which are classified against the Town Centre Hierarchy through the London Plan. These range in designations from Ealing - a Metropolitan Town Centre and Southall a Major Town Centre, to Hanwell, Greenford and Acton - all District Town Centres. In addition, there are also a number of Neighbourhood Centres.

Elements of the key policies in the Development Strategy which this section seeks to measure include:

- Policy 1.2(c) - performance in relation to targets for the supply of new floorspace – i.e. 98,500 sq. m. of comparison (non-food) retail space and up to 29,900 sq. m. of convenience (food) retail floorspace over the plan period.
- Policy 1.2(b) - performance in relation to encouraging the majority of all new office development in Ealing town centre, a secondary focus at Park Royal and with some provision at Greenford.

Elements of policies in other DPDs which are measurable and can be monitored include:
Development Management DPD (adopted Dec 2013):

- Ealing Local Policy 4B 'Retail', and
- Ealing Local Policy 4C 'Main town centre uses'.

Following a survey in 2013 to establish the use of all retail units in the borough, most units forming part of parades or groups are now defined as falling within either a primary or secondary frontage.

Ealing Local Policy 4B 'Retail' policy 4B(A) seeks to secure 100% of A1 retail uses within designated primary frontages, in an attempt to consolidate the retail function of shopping parades and areas within neighbourhood, and town centres. In recognising the contribution that other complementary uses also make to the functioning of retail areas, Policy 4B(B) provides flexibility by allowing a higher proportion of other complementary uses within secondary frontages.

Policy 4B therefore applies in assessing any planning applications for change of use.

Policy 4B(D) also seeks to ensure all residential areas are served by local shopping within a 400m radius, and to provide for new retail in areas of emerging need or deficiency. The effectiveness of this policy will be monitored following completion of the next borough-wide retail survey.

Ealing Local Policy 4C 'Main town centre uses' also seeks to avoid any over-concentration of particular types of uses which may erode local amenity by nature of that concentration. Such uses include hot food takeaways (use Class A5), amusement arcades and night-time uses. The

effectiveness of this policy will also be monitored following completion of the next borough-wide retail survey.

The following analysis of completions and planning approvals within the monitoring period 2014-19 includes reference to land uses within the Use Classes Order (2013), as this was operational over the monitoring period. It should be noted however that following subsequent changes to the Use Classes Order which came into force from 1st September 2020, a number of the classes monitored here have been revoked. Class A 1/2/3 were effectively replaced with Use Class E (a, b, c). A4/5 uses were not covered by Use Class E and became defined as 'Sui Generis'. Class B1 Business has effectively been replaced by new class E(g). D1 was split out and replaced by the new Classes E (e-f) and F1. D2 was split out and replaced by the new Classes E (d) and F2 (c-d) as well as several newly defined 'Sui Generis' uses. These changes, including notably the introduction of a 'super' E class group, alongside further extensions to permitted development rights, will make ongoing monitoring of such activity at the more granular level difficult in the future.

Methodology for analysis

This section provides a brief overview of the approach used to demonstrate change in activities across designated Town Centres, and classified by Use Class, and the evaluation of the influence of policies on development activity. The analysis initially provides a five-year breakdown of indicative (Approvals) and actual (Completions) net change in floorspace for each relevant Use Class within each of the designated Town Centres. In absolute terms, the scale of activity is not comparable from centre to centre, but the changes can be standardised to allow for relative comparisons to be made between the centres. The absolute outputs are supplemented by a plot matrix demonstrating standardised indicative and actual change in each type of activity within each designated Town Centre over the five reporting years. Standardised value, or z-score, is used to enable comparison of relative change for a particular Use Class and town centre over time by putting raw figures on the same scale. The standardisation formula demonstrated below was used:

$$z = \frac{x - \mu}{\sigma}$$

z z-score or the standardised value

x total indicative floorspace (sqm) change in (town centre) during (financial year)

μ mean over the five-year period

σ standard deviation

More specifically, z-score indicates the extent to which total indicative floorspace change for a particular Use Class in a specific year and town centre deviates from the five-year average or mean of this Use Class in this town centre. This means that when $z = 0$, x does not necessarily equal to 0 as the two possible scenarios include either $\mu = 0 = x$ or $x = \mu$ where x is greater or less than 0. Note that variations in the total number of approvals and completions recorded under each Use Class, stated in the summary tables (Table X and X), may have implications to the observed trends.

Following this is a focused and in-depth analysis of the relevant policies that are being monitored in this chapter, demonstrating spatial and temporal trends observed from both the Approvals and Completions data.

Approvals

This section examines 'indicative' commercial development activity based on approvals, within and outside of the town centres.

Tables 4.1-4.5 report the proposed net change in floorspace broken down by the main town centre use classes, and by geography. The tables report activity within and beyond the centres, to assist in understanding the spatial distribution of change/activity.

Tables 4.6 and 4.7 record the total approved net change in respect of the main town centre type uses across the borough as a whole and within the centres only (town and neighbourhood) respectively.

Table 4.1 – Net change in non-residential floorspace (sq. m.) by approvals within designated Town Centres for 2014/15

	Use Class											
Town Centre	**A1**	**A2**	**A3**	**A4**	**A5**	**B1**	**B2**	**B8**	**C2**	**D1**	**D2**	**SG**
Acton	-4154	32	0	0	0	-1347	0	0	0	-142	0	7304
Ealing	600	1215	418	1015	-33	-10266	0	0	0	-1612	2819	1870
Hanwell	0	-43	-69	0	0	0	0	0	0	0	0	0
Greenford	-259	26	84	0	0	0	0	0	0	0	0	202
Southall	555	0	41	-354	0	0	0	0	0	3000	0	98
Total in TCs	**-3258**	**1230**	**474**	**661**	**-33**	**-11613**	**0**	**0**	**0**	**1246**	**2819**	**9474**
Total outside TCs	**1872**	**542**	**1673**	**-718**	**32**	**-63591**	**3995**	**309**	**397**	**-3779**	**2913**	**6113**
Total in T. and Neighb. Cs	**-3106**	**1204**	**459**	**149**	**-33**	**-11405**	**0**	**660**	**0**	**23**	**2819**	**10858**
Grand total	**-1386**	**1772**	**2147**	**-57**	**28**	**-75204**	**3995**	**309**	**397**	**-2533**	**5732**	**15587**

Table 4.2 – Net change in non-residential floorspace (sq. m.) by approvals within designated Town Centres for 2015/16

	Use Class											
Town Centre	**A1**	**A2**	**A3**	**A4**	**A5**	**B1**	**B2**	**B8**	**C2**	**D1**	**D2**	**SG**
Acton	-30	0	569	-370	0	-1320	0	0	0	20	0	-4455
Ealing	-877	-282	222	0	239	-5613	-85	0	0	-253	0	393
Hanwell	-70	29	0	0	-120	-420	0	0	0	0	0	-29
Greenford	55	-49	0	0	0	-261	0	0	0	0	0	261
Southall	119	-172	188	0	34	18	0	35	0	405	0	165
Total in TCs	**-803**	**-474**	**979**	**-370**	**153**	**-7596**	**-85**	**35**	**0**	**172**	**0**	**-3665**
Total outside TCs	**-1493**	**429**	**323**	**-35**	**12**	**-34169**	**2835**	**3525**	**0**	**18118**	**2143**	**-2831**
Total in T. and Neighb. Cs	**-1244**	**-334**	**1097**	**-370**	**153**	**-7315**	**-85**	**35**	**0**	**395**	**-175**	**-3665**
Grand total	**-2296**	**-45**	**1302**	**-405**	**165**	**-41765**	**2750**	**3560**	**0**	**18290**	**2143**	**-6496**

Table 4.3 – Net change in non-residential Floorspace (sq. m.) by approvals within designated Town Centres for 2016/17

	Use Class											
Town Centre	**A1**	**A2**	**A3**	**A4**	**A5**	**B1**	**B2**	**B8**	**C2**	**D1**	**D2**	**SG**
Acton	-514	0	190	160	0	-3220	-658	-75	0	60	0	-398
Ealing	-996	0	407	0	0	-3635	0	0	0	1104	0	71
Hanwell	-126	43	30	79	0	-61	0	0	0	0	0	-598
Greenford	-167	20	335	0	0	0	0	0	0	-74	0	327
Southall	543	25	341	0	24	0	0	0	0	-260	1841	0
Total in TCs	**-1260**	**88**	**1303**	**239**	**24**	**-6916**	**-658**	**-75**	**0**	**830**	**1841**	**-598**
Total outside TCs	**-11**	**463**	**1844**	**-252**	**-62**	**-6903**	**2677**	**-2052**	**0**	**19617**	**8515**	**-38189**
Total in T. and Neighb. Cs	**-1121**	**236**	**2115**	**-219**	**24**	**-7752**	**-612**	**-75**	**0**	**1027**	**1841**	**-604**
Grand total	**-1271**	**551**	**3147**	**-13**	**-38**	**-13819**	**2019**	**-2127**	**0**	**20447**	**10356**	**-38787**

Table 4.4 – Net change in non-residential floorspace (sq. m.) by approvals within designated Town Centres for 2017/18

	Use Class											
Town Centre	**A1**	**A2**	**A3**	**A4**	**A5**	**B1**	**B2**	**B8**	**C2**	**D1**	**D2**	**SG**
Acton	438	-528	0	0	0	-651	-170	46	0	38	0	0
Ealing	3557	-17	5072	101	-124	14787	-613	0	0	1030	3079	590
Hanwell	592	0	0	0	0	64	0	0	0	-56	0	-461
Greenford	105	-38	0	0	0	0	0	0	0	0	230	0
Southall	-65	111	196	-80	122	100	0	0	0	-122	0	272
Total in TCs	**4627**	**-472**	**5268**	**21**	**-2**	**14300**	**-783**	**46**	**0**	**890**	**3309**	**401**
Total outside TCs	**6311**	**857**	**2075**	**573**	**773**	**-86208**	**1661**	**-4114**	**0**	**15932**	**3384**	**-1562**
Total in T. and Neighb. Cs	**5491**	**-585**	**5687**	**21**	**-2**	**14228**	**-783**	**-648**	**0**	**706**	**2889**	**480**
Grand total	**10938**	**385**	**7343**	**594**	**771**	**-71908**	**878**	**-4068**	**0**	**16822**	**6693**	**-1161**

Table 4.5 – Net change in non-residential floorspace (sq. m.) by approvals within designated Town Centres for 2018/19

	Use Class											
Town Centre	**A1**	**A2**	**A3**	**A4**	**A5**	**B1**	**B2**	**B8**	**C2**	**D1**	**D2**	**SG**
Acton	10	-251	238	0	0	-1749	0	-340	0	744	21	0
Ealing	554	98	71	0	0	198	0	-38	0	-1983	0	-1282
Hanwell	-2613	0	0	0	0	-758	-429	0	0	0	0	-341
Greenford	0	0	0	0	0	0	0	0	0	0	-357	0
Southall	-181	0	235	0	0	0	0	0	0	0	0	1040
Total in TCs	**-2230**	**-153**	**544**	**0**	**0**	**-2309**	**-429**	**-378**	**0**	**-1239**	**-336**	**-583**
Total outside TCs	**-2557**	**268**	**36**	**0**	**42**	**-9048**	**-12459**	**8891**	**-707**	**14002**	**386**	**-1354**
Total in T. and Neighb. Cs	**-3460**	**-143**	**611**	**0**	**0**	**-2623**	**-429**	**-378**	**0**	**-1319**	**-756**	**-778**
Grand total	**-4787**	**115**	**580**	**0**	**42**	**-11357**	**-12888**	**8513**	**-707**	**12763**	**50**	**-1937**

Table 4.6 – Net change in non-residential Floorspace (sq. m.) by approvals by use class across the borough (All reporting years)

	Use Class											
Year	**A1**	**A2**	**A3**	**A4**	**A5**	**B1**	**B2**	**B8**	**C2**	**D1**	**D2**	**SG**
2014/15	-1386	1772	2147	-57	288	-75204	3995	309	397	-2533	5732	15587
2015/16	-2296	-45	1302	-405	165	-41765	2750	3560	0	18290	2143	-6496
2016/17	-1271	551	3147	-13	-38	-13819	2019	-2127	0	20447	10356	-38787
2017/18	10938	385	7343	594	771	-71908	878	-4068	0	16822	6693	-1161
2018/19	-4787	115	580	0	42	-11357	-12888	8513	-707	12763	50	-1937
Total	**1198**	**2778**	**14519**	**119**	**1228**	**-214053**	**-3246**	**6187**	**-310**	**65789**	**24974**	**-32794**

Table 4.7 – Net change in non-residential floorspace (sq. m.) by approvals by use class in town and neighbourhood centres

Year	Use Class											
	A1	**A2**	**A3**	**A4**	**A5**	**B1**	**B2**	**B8**	**C2**	**D1**	**D2**	**SG**
2014/15	-3106	1204	459	149	-33	-11405	0	660	0	23	2819	10858
2015/16	-1244	-334	1097	-370	153	-7315	-85	35	0	395	-175	-3665
2016/17	-1121	236	2115	-219	24	-7752	-612	-75	0	1027	1841	-604
2017/18	5491	-585	5687	21	-2	14228	-783	-648	0	706	2889	480
2018/19	-3460	-143	611	0	0	-2623	-429	-378	0	-1319	-756	-778
Total	**-3440**	**378**	**9969**	**-419**	**142**	**-14867**	**-1909**	**-406**	**0**	**832**	**6618**	**6291**

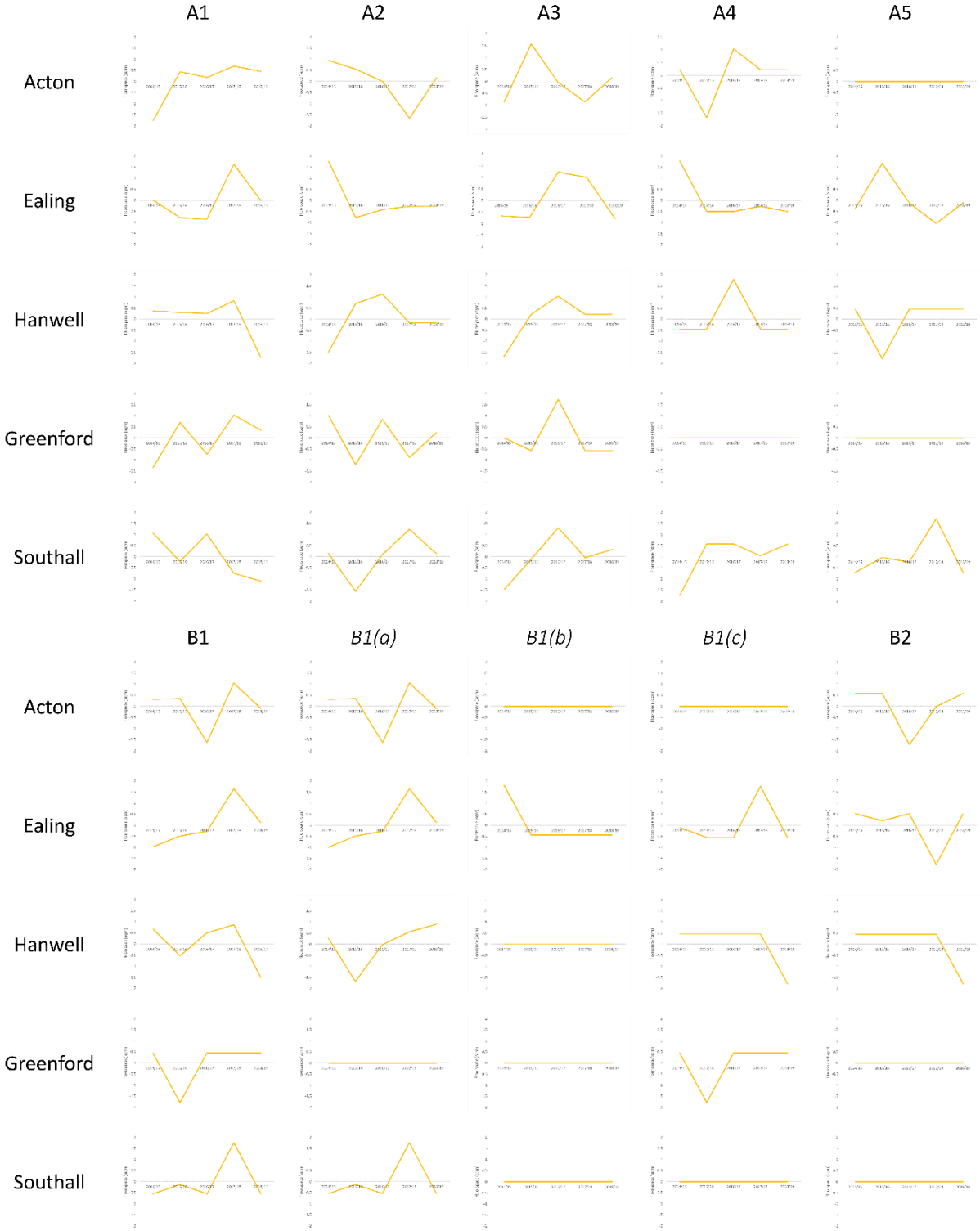
Among all Class A uses, A3 has achieved the greatest net gain over the five-year period, accounting for more than 70% of all net gain recorded in this Class. From a breakdown of net Class A floorspace gained/lost by town centre, the majority of the increase in net A3 floorspace is located in Ealing Town Centre. In addition, Ealing also constitutes the key contributor to net gain of A1, A2 and A5 floorspace over the years. This signifies a spatially uneven change in Class A uses across town centres.

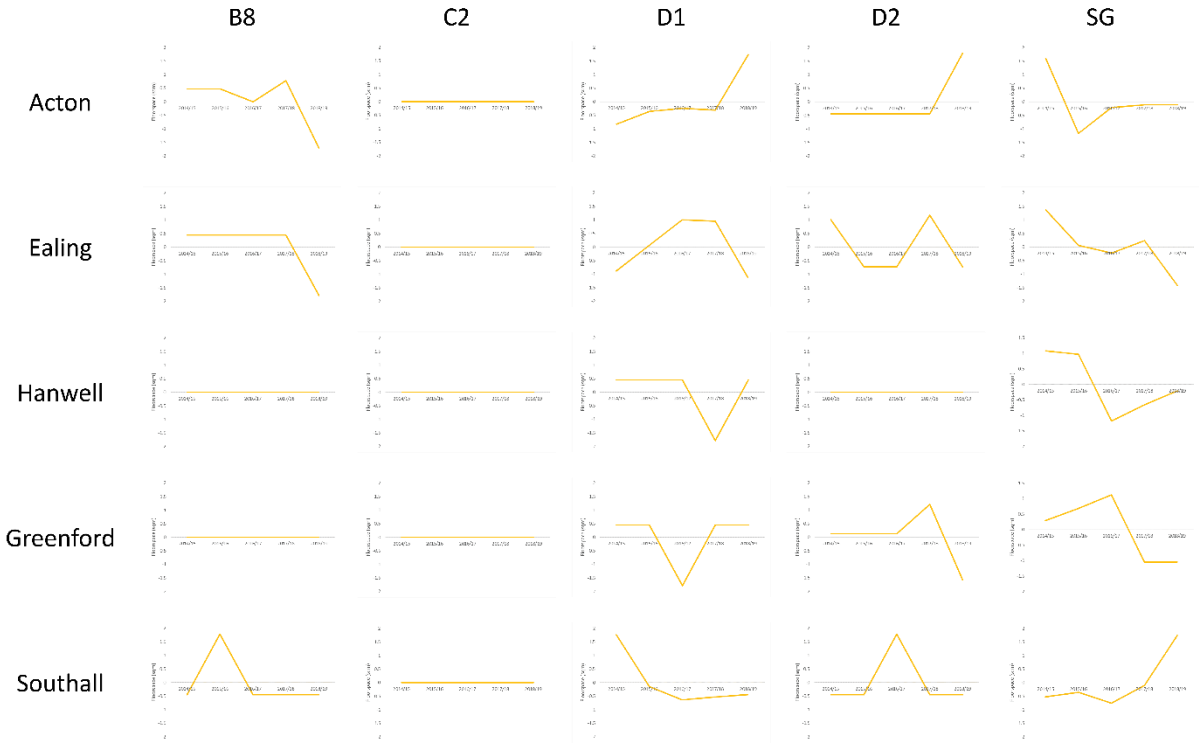
The greatest increase in net A2 floorspace approved occurred in Ealing during 2014/15, with 1,373sqm gained. The lack of major decrease in Ealing across the 5-year period could be indicating that there is good retainment of local financial and professional services over time. However, in recent years, while Ealing and Southall have seen minor increase in net A2 floorspace, relatively significant reduction is evident in Acton during 2017/18 followed by further minor decrease in 2018/19. The absence of comparable increase across other town centres may suggest that a proportion of A2 floorspace in Acton has been lost to other areas outside town centres, and could be within or outside the borough, which requires further investigation.

Besides recent minor net loss in Greenford, there is generally net gain or stagnation of net D2 floorspace across all town centres. In particular, an overall net gain of 5,898 sq. m. in Ealing Town Centre accounts for over 75% of the total net gain recorded across all town centres, followed by Southall with a net gain of 1,841 sq. m. overall.

Analysis after standardisation (approvals)

Figure 4.1 - Matrix of normalised indicative change activities for each town centre over the five-year period





Key Observations

- Use Class A1, 2 and 3 have all seen relatively a greater number of applications and fluctuations over the five-year period compared with A4 and A5 uses. Note that A3 was an aggregate of A3, 4 and 5 in the past, which may be connected to the observed difference in number of applications.
- Indicative change in B1(a) office floorspace across all town centres accounts for most of the overall trends in Class B1 floorspace except for Hanwell and Greenford. Both town centres have seen negative deviation of over 1.5 standard deviation in B1(c) light industrial/R&D floorspace, which contributed to their observed trends for Class B floorspace. This could imply the relative significance of light industrial activities in both town centres in comparison to office use.
- There had been relatively significant negative deviation from local averages of approved B1(a) floorspace change in Acton and Hanwell post 2015, in which it is also important to note that local averages in Acton (-1,657.4), Ealing (-990.8) and Hanwell (-56) are all negative. See section below for more details.
- While there was no indicative change in B2 industrial floorspace in Greenford and Southall, relatively significant reduction is evident in the other three town centres with recent rebound in both Acton and Ealing.
- No fluctuation is observed for C2 residential institutions as none of the town centres has seen any approved gain or loss of C2 floorspace over the five-year period.
- Besides Acton, town centres have seen either zero or lower-than-average approved change in D2 floorspace for leisure and assembly, with the greatest negative deviation from the local average evident in Greenford.

- Approved (indicative) net SG floorspace change in all town centres except for Southall has mostly been lower than average in recent years, in which the positive deviation in Southall was partly due to a 15-year consent for construction of a four-storey building on Brent Road with a total floorspace of 782 sq. m. for temporary use as a marketing suite.

Completions

This section examines 'actual' commercial development activity based on recorded completions, within and outside of the town centres.

Tables 4.8-4.12 report the completed net change in floorspace broken down by the main town centre use classes, and by geography. The tables report activity within and beyond the centres, to assist in understanding the spatial distribution of change/activity.

Tables 4.13 and 4.14 record the total completed net change in respect of the main town centre type uses across the borough as a whole and within the centres only (town and neighbourhood) respectively.

Table 4.8 – Net change in non-residential floorspace (sq. m.) completed during 2014/15

Town Centre / Use Class	A1	A2	A3	A4	A5	B1	B1a	B1b	B1c	B2	B8	C2	D1	D2	SG
Acton	751	80	979	0	0	-1693	-1693	0	0	-56	0	0	1962	-1	2047
Ealing	-788	-442	613	291	0	-285	-285	0	0	0	-43	0	-1133	0	100
Hanwell	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Greenford	-57	0	84	0	0	1215	1215	0	0	0	-273	0	113	118	0
Southall	5	70	-70	0	0	-48	-48	0	0	0	0	0	0	-629	0
Total in TCs	**-89**	**-292**	**1606**	**291**	**0**	**-811**	**-811**	**0**	**0**	**-56**	**-316**	**0**	**942**	**-512**	**2147**
Outside TCs	**1660**	**195**	**2510**	**0**	**59**	**395**	**-3675**	**677**	**3393**	**-1694**	**-4620**	**-413**	**5691**	**492**	**9453**
Grand total	**1571**	**-97**	**4116**	**291**	**59**	**-416**	**-4486**	**677**	**3393**	**-1750**	**-4936**	**-413**	**6633**	**-20**	**11600**

Table 4.9 – Net change in non-residential floorspace (sq. m.) completed during 2015/16

Town Centre / Use Class	A1	A2	A3	A4	A5	B1	B1a	B1b	B1c	B2	B8	C2	D1	D2	SG
Acton	-186	0	0	0	0	0	0	0	0	0	0	0	0	0	40
Ealing	-1063	-115	428	0	0	-11225	-11343	58	60	0	0	0	86	180	0
Hanwell	-70	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Greenford	55	-23	0	0	0	0	0	0	0	-100	0	0	0	0	0
Southall	785	299	-38	0	0	50	640	0	-590	0	0	0	0	-306	-304
Total in TCs	**-479**	**161**	**390**	**0**	**0**	**-11175**	**-10703**	**58**	**-530**	**-100**	**0**	**0**	**86**	**-126**	**-264**
Outside TCs	**-1363**	**737**	**539**	**0**	**12**	**-7659**	**-1465**	**0**	**-6194**	**4473**	**244**	**206**	**6446**	**-2577**	**-278**
Grand total	**-1842**	**898**	**929**	**0**	**12**	**-18834**	**-12168**	**58**	**-6724**	**4373**	**244**	**206**	**6532**	**-2703**	**-542**

Table 4.10 - Net change in non-residential floorspace (sq. m.) completed during 2016/17

Town Centre/Use Class	A1	A2	A3	A4	A5	B1	B1a	B1b	B1c	B2	B8	C2	D1	D2	SG
Acton	0	0	0	0	0	-515	-515	0	0	0	0	0	160	0	-168
Ealing	-384	397	171	150	0	104	564	0	-460	0	0	0	-269	222	-271
Hanwell	0	0	0	0	-120	0	0	0	0	0	0	0	-149	0	0
Greenford	221	20	0	-390	0	-261	0	0	-261	0	0	0	442	0	463
Southall	9	0	116	0	0	18	18	0	0	0	-70	0	0	0	0
Total in TCs	**-154**	**417**	**287**	**-240**	**-120**	**-654**	**67**	**0**	**-721**	**0**	**-70**	**0**	**184**	**222**	**24**
Outside TCs	**1097**	**-327**	**1264**	**242**	**674**	**-8793**	**-9161**	**-314**	**682**	**614**	**1924**	**237**	**18234**	**2203**	**-2311**
Grand total	**943**	**90**	**1551**	**2**	**554**	**-9447**	**-9094**	**-314**	**-39**	**614**	**1854**	**237**	**18418**	**2425**	**-2287**

Table 4.11 – Net change in non-residential floorspace (sq. m.) completed during 2017/18

Town Centre/Use Class	A1	A2	A3	A4	A5	B1	B1a	B1b	B1c	B2	B8	C2	D1	D2	SG
Acton	-554	3	789	-210	0	-916	-916	0	0	0	-75	0	75	43	0
Ealing	-1458	-96	985	0	-4	-631	-938	0	307	-613	0	0	-39	1087	-581
Hanwell	-42	72	0	31	0	0	0	0	0	0	0	0	0	0	-29
Greenford	-151	0	118	0	0	0	0	0	0	0	0	0	-74	0	148
Southall	-43	-175	137	0	0	0	0	0	0	0	105	0	-294	0	0
Total in TCs	**-2248**	**-196**	**2029**	**-179**	**-4**	**-1547**	**-1854**	**0**	**307**	**-613**	**30**	**0**	**-332**	**1130**	**-462**
Outside TCs	**-65**	**-64**	**32**	**-512**	**-36**	**-6382**	**-9815**	**-742**	**4175**	**788**	**-9974**	**0**	**5807**	**185**	**-44**
Grand total	**-2313**	**-260**	**2061**	**-691**	**-40**	**-7929**	**-11669**	**-742**	**4482**	**175**	**-9944**	**0**	**5475**	**1315**	**-506**

Table 4.12 – Net change in non-residential floorspace (sq. m.) completed during 2018/19

Town Centre/Use Class	A1	A2	A3	A4	A5	B1	B1a	B1b	B1c	B2	B8	C2	D1	D2	SG
Acton	136	30	0	0	0	-427	-427	0	0	-413	0	0	0	0	-4353
Ealing	2995	-1400	3501	377	0	-9591	-9591	0	0	0	0	0	707	2306	0
Hanwell	-52	0	30	0	0	-383	-61	0	-322	0	0	0	0	0	0
Greenford	-155	0	0	0	0	0	0	0	0	0	0	0	0	0	179
Southall	-85	0	0	0	0	100	100	0	0	0	0	0	0	0	0
Total in TCs	**2389**	**-1370**	**3531**	**377**	**0**	**-10301**	**-9979**	**0**	**-322**	**-413**	**0**	**0**	**707**	**2306**	**-4174**
Outside TCs	**1029**	**99**	**655**	**0**	**42**	**-21843**	**-20868**	**100**	**-1075**	**424**	**-912**	**0**	**15765**	**317**	**-6011**
Grand total	**3418**	**-1271**	**4186**	**377**	**42**	**-32144**	**-30847**	**100**	**-1397**	**11**	**-912**	**0**	**16472**	**2623**	**-10185**

A1 Retail Floorspace

In 2013/14, there was a loss of 1,388 sq. m. of retail floorspace within town centres across the borough. Therefore, the net gain figure of 1,571 sq. m. is a significant upturn from the previous monitoring period (+2,959 sq. m.). However, it is notable that over the 5 reporting years, two of the five years saw a net loss of retail space delivered (completed) across the borough.

Over the 5 monitoring years, retail floorspace delivered (completed) 'within Town centre' boundaries only exceeded the floorspace delivered 'outside Town centre' boundaries in two of those years: 2015/2016, and the most recent reporting year 2018/2019.

D2 Leisure

Over the 5 reporting years, the trends in delivery of Leisure floorspace have varied significantly. While the first two reporting years 2014/15 and 2015/16 saw a net loss of leisure space delivered in the borough overall and within Town Centres, the latter three years saw the trend reverse into positive net delivery.

Financial year 2016/17 saw a net gain of 2,425 sq. m. of Leisure (D2) floorspace delivered across the borough. Out of the total in that year, only 222 sq. m. of D2 floorspace was completed within Town Centres, constituting just under 10% of the borough-wide figure. In the next year however over 80% (1,130 sq. m.) of the Leisure floorspace completed was recorded as occuring within Town Centre boundaries with the overall completed floorspace in the D2 Use Class reported at 1,315 sq. m.

The most recent reporting year – Financial Year 2018/2019 saw an almost two-fold increase of the same trend both as measured within the Town Centres and in the borough overall. The floorspace completed within town centres totalled 2,306 sq. m., which together with the 317 sq. m. delivered outside TC boundaries, accounted for a total delivery of 2,623 sq. m. of leisure floorspace in Ealing that year.

Table 4.13 – Net change in non-residential floorspace (sq. m.) completed across the borough

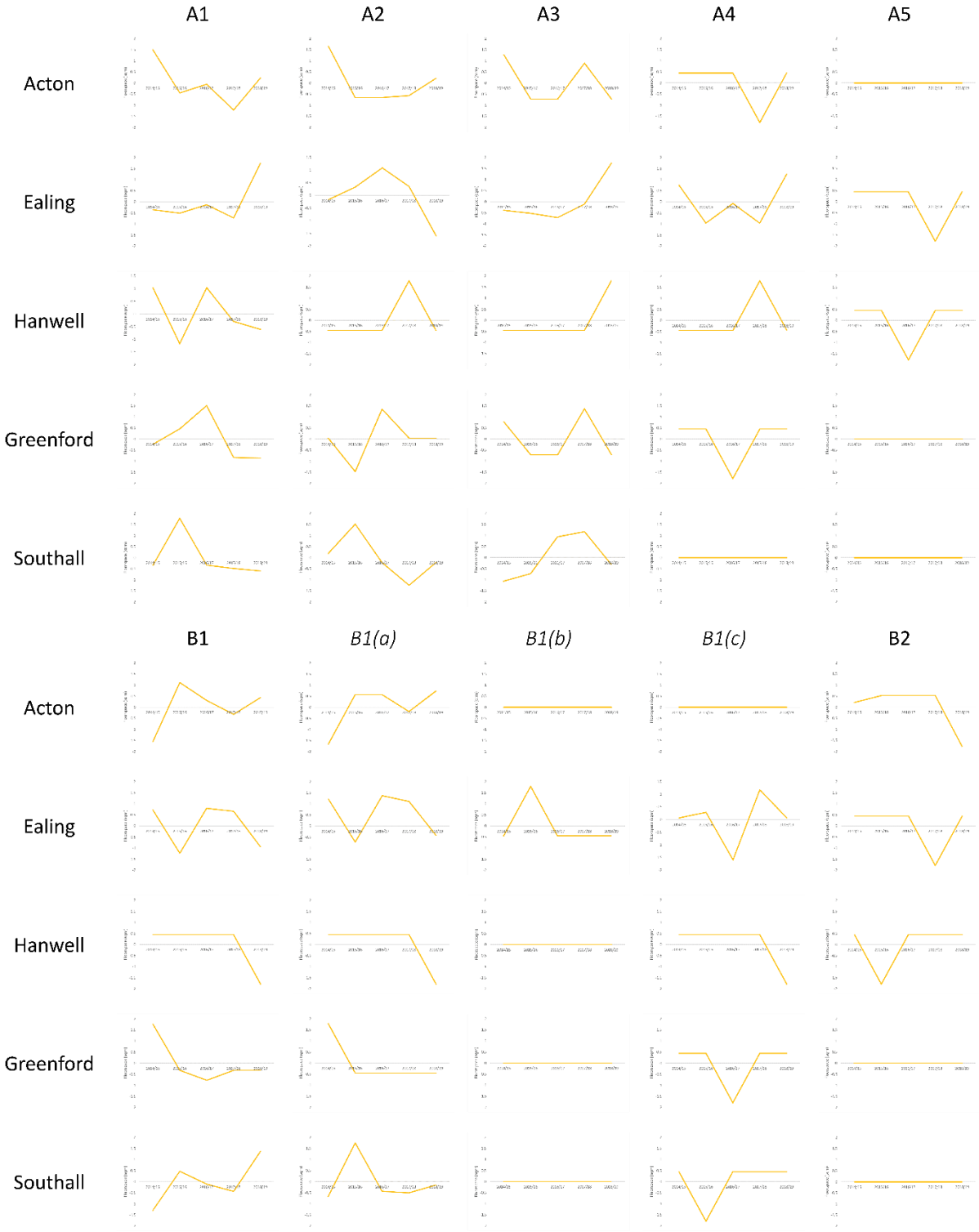
	Use Class														
Year	A1	A2	A3	A4	A5	B1	B1a	B1b	B1c	B2	B8	C2	D1	D2	SG
2014/15	1577	520963	4116	291	59	-416	-4486	677	3393	-1750	-4936	-413	6633	-20	11600
2015/16	-1842	898	929	0	12	-18834	-12168	58	-6724	4373	244	206	6532	-2703	-542
2016/17	943	183565	1551	2	554	-9447	-9094	-314	-39	614	1854	237	18418	2425	-2287
2017/18	-2313	-260	2061	-691	-40	-7929	-11669	-742	4482	175	-9944	0	5475	1315	-506
2018/19	3418	178825	4186	377	42	-32144	-30847	100	-1397	11	-912	0	16472	2623	-10185
Total	1783	883991	12843	-21	627	-68770	-68264	-221	-285	3423	-13694	30	53530	3640	-1920

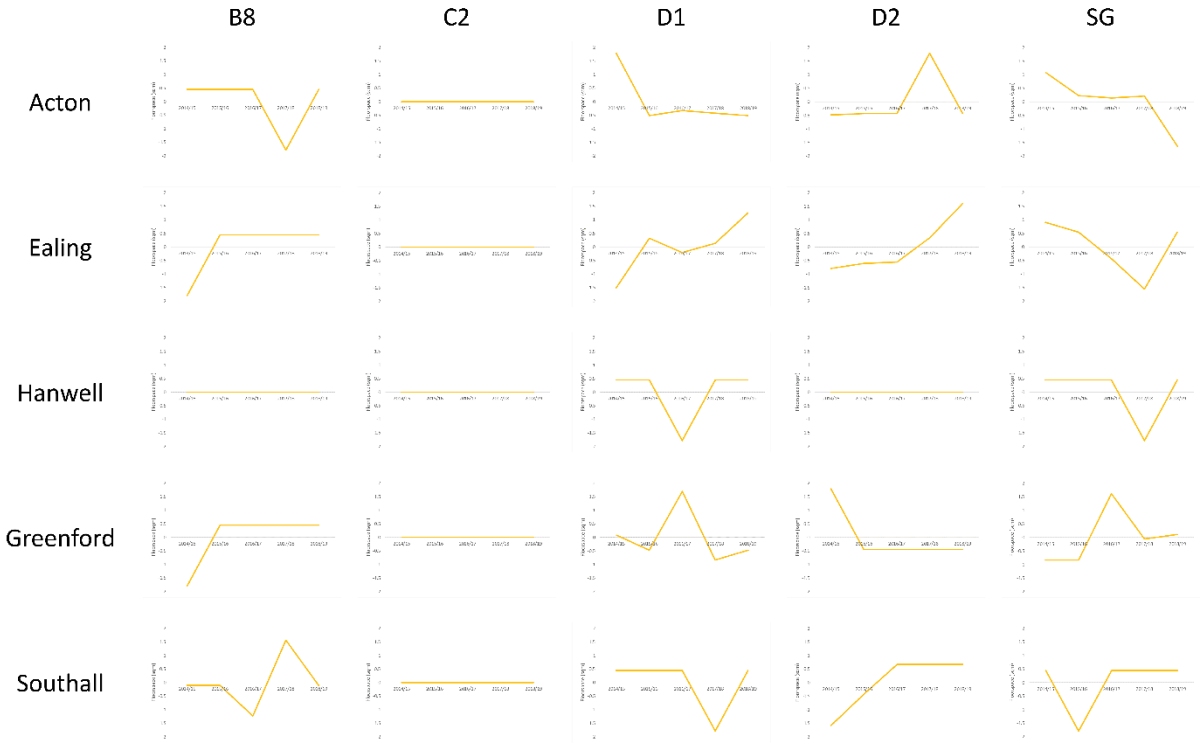
Table 4.14 – Net change in non-residential floorspace (sq. m.) completed in town and neighbourhood centres

	Use Class														
Year	A1	A2	A3	A4	A5	B1	B1a	B1b	B1c	B2	B8	C2	D1	D2	SG
2014/15	1609	-209	2824	291	-23	-2025	-2025	0	0	-56	-316	0	1906	-512	2333
2015/16	-709	261	502	0	0	-11315	-10843	58	-530	-100	0	0	86	-3312	-234
2016/17	-247	247	432	-240	-120	-942	-221	0	-721	0	-70	0	144	222	24
2017/18	-1855	-349	1925	-691	-4	-1451	-1758	0	307	-613	-14	0	-1555	1235	-462
2018/19	2684	-1370	4304	377	0	-11150	-10828	0	-322	-413	0	0	658	2306	-4067
Total	1482	-1420	9987	-263	-147	-26883	-25675	58	-1266	-1182	-400	0	1239	-61	-2406

Analysis after standardisation (completions)

Figure 4.2 - Matrix of standardised net completed floorspaces for each use class by town centre over the five-year period





Key Observations

- Ealing Town Centre has achieved significantly greater than average net positive change in A1 floorspace while close to or lower than average net change is evident in other town centres.
- Similar observation drawn from approvals on the difference between A3 and A4/5 is also evident in completions.
- While net loss of B1(c) light industrial floorspace in Southall was balanced by net gain of B1(a) office floorspace, this is not the case for Ealing where net gain of B1(c) floorspace is not comparable to its net loss of B1(a) floorspace, which contributed mostly to its overall trend for Class B1 activities.
- Stagnation observed in B2 and B8 across multiple town centres was due to absence of net change ($x = 0$). For some, stagnation occurs above zero because there had been net loss in one or more year(s), which lead to $\mu < 0$ yielding negative means.
- The aforementioned observation for C2 also applies to completions.
- It is evident that town centres except for Ealing have seen close to or lower than local average net change of local amenities and leisure/assembly Class D floorspace in recent years. This could be due to relocation or natural loss of these types of activities in the four town centres.

Policy Discussion

Having regard to the various policy objectives this section hones-in on activity relating to two use classes – A1 (Retail) and B1(a) (Offices).

Retail (A1 Use class)

Figures 4.3 and 4.5 below shows the relative change in A1 retail between the town centres over the 5 reporting years, in terms of approvals and completions respectively. Figures 3.4 and 3.6 similarly presents the cumulative change by centre, in respect of approvals and completions respectively.

Figure 4.3 – Indicative (based on approvals) net A1 floorspace change in town centres by year

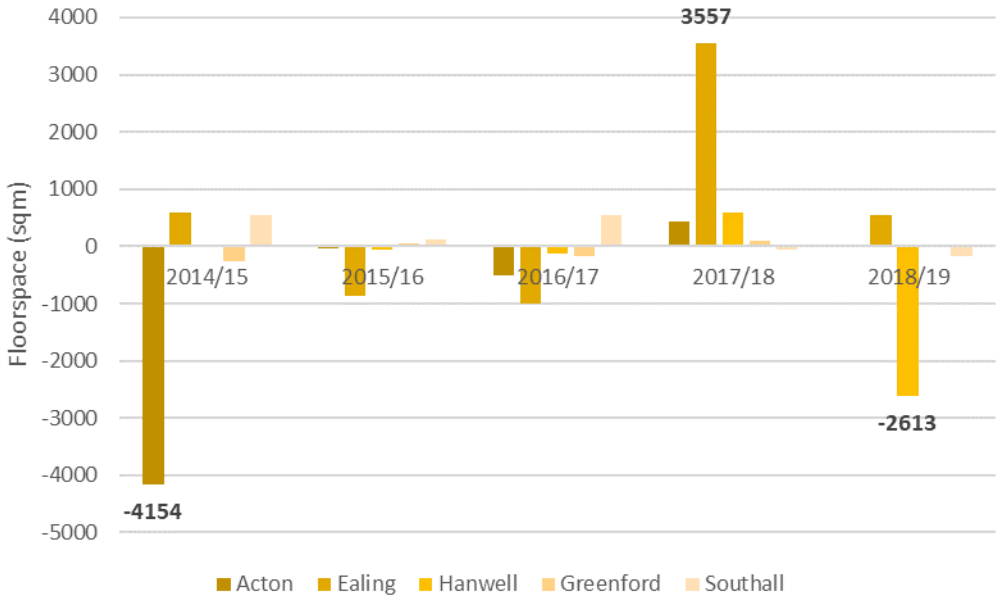


Figure 4.4 - Total indicative (based on approvals) net A1 floorspace change across town centres over the five-year period

Figure 4.5 - Net A1 floorspace change (based on completions) in town centres by year

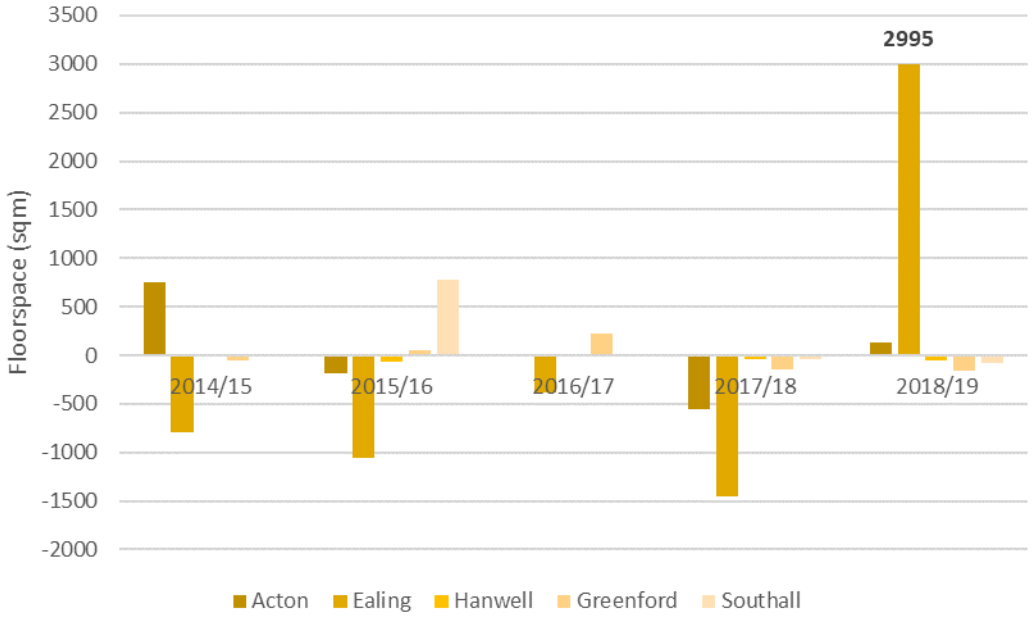
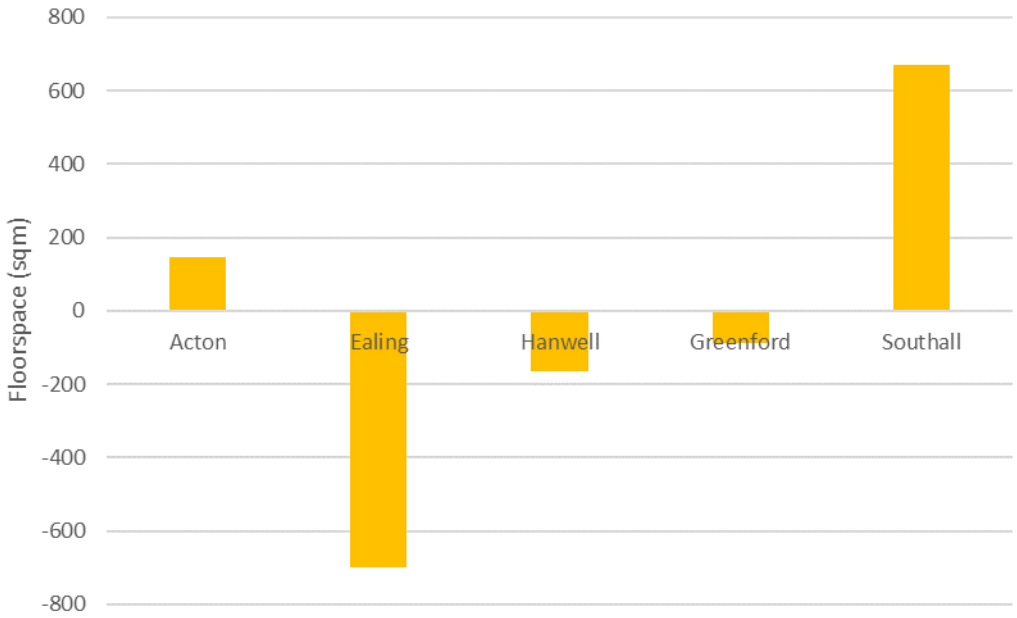


Figure 4.6 - Total net A1 floorspace change (based on completions) across town centres over the five-year period



In terms of approvals the most significant net losses were recorded in Acton, whilst Ealing Metropolitan Centre has experienced net gain over the 5 year period, although the gain largely arises in a single reporting year (2017/18). The position in relation to completions is much less

pronounced with the scale of change being much smaller relative to approvals. Ealing has experienced overall losses with Southall reporting net gains.

Intensity of activity

As well as examining the change in floorspace by area in aggregated terms, it is also useful to examine the spatial intensity of change in respect of the number of schemes and scale of change. The maps below illustrate the spatial relationship between these two measures. Individual schemes are captured as points and any clustering is visibly evident. The scale/magnitude of change (in floorspace terms) is illustrated through shading. Schemes resulting in net losses and gains are illustrated independently on separate maps.

Approvals

*Figure 4.7 - Spatial distribution of applications across the borough plotted against application density weighted by indicative (approvals) net A1 floorspace **gained** over the five-year period (hereby referred to as 'weighted heatmap')*

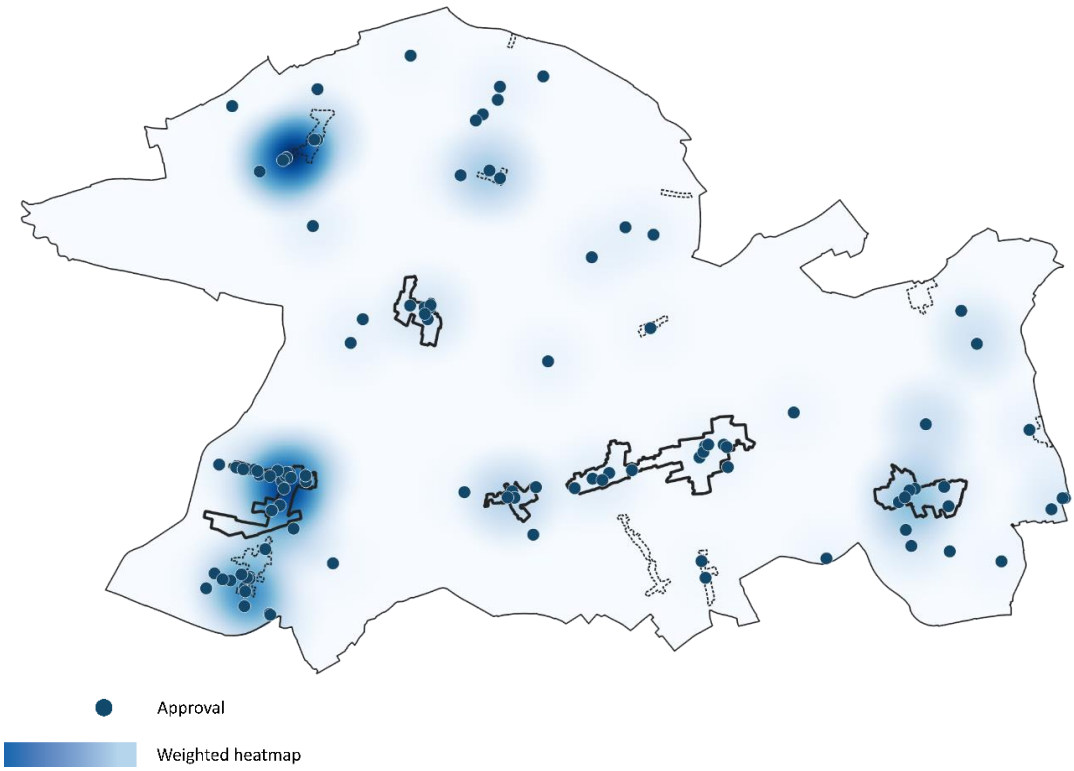
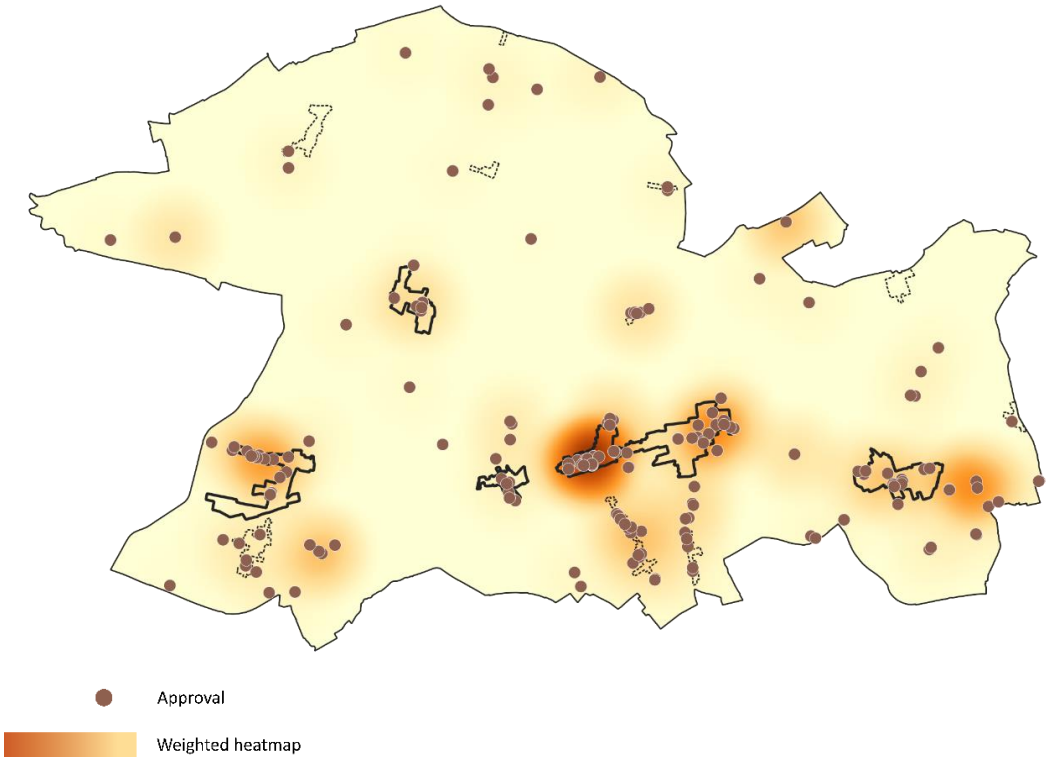


*Figure 4.8 – Weighted heatmap of indicative (approvals) net A1 floorspace **lost** across the LPA over the five-year period*



Comparing concentration of approvals (point density) against the scale of activity (weighted heatmap reflecting net A1 floorspace changes (sq. m.)), it is evident that there are a fair number schemes with minor net gain in Ealing, whereas the density of schemes that have a net gain and the scale of such net gain in Southall are both relatively significant. Two major approvals in Southall with a net gain of over 500 sq. m. are both located on the high street. Whilst the number schemes in Northolt Neighbourhood Centre is relatively minor, one of the three schemes that involves an approved net gain of A1 floorspace exceeds the threshold of 500 sq. m. This scheme involves a change of use from B8 storage warehouse.

On the other hand, the western end of Ealing Metropolitan Centre has seen a relatively high concentration of approvals that if implemented would result in a net loss of A1 floorspace. The weighted heatmap also illustrates that the scale of such loss is also relatively greater than in other town centres and beyond. In comparison, while there is also moderate concentration of approvals with an indicative net loss in the eastern end of Ealing centre, the scale of such loss is not as significant. Besides, comparing across Figures 3.7 and 3.8, while most of the town centres and neighbourhood centres have demonstrated both indicative net gains and losses over the five-year period to varying extent, meaning that they might potentially balance out each other depending on the scale of change, a series of approvals in Northfields neighbourhood centre has led to minor indicative net loss, ranging from 20 to just over 100 sq. m., without any indicative net gain.

Completions

Figure 4.9 - Weighted heatmap of net A1 floorspace gained (based on completions) across the LPA over the five-year period

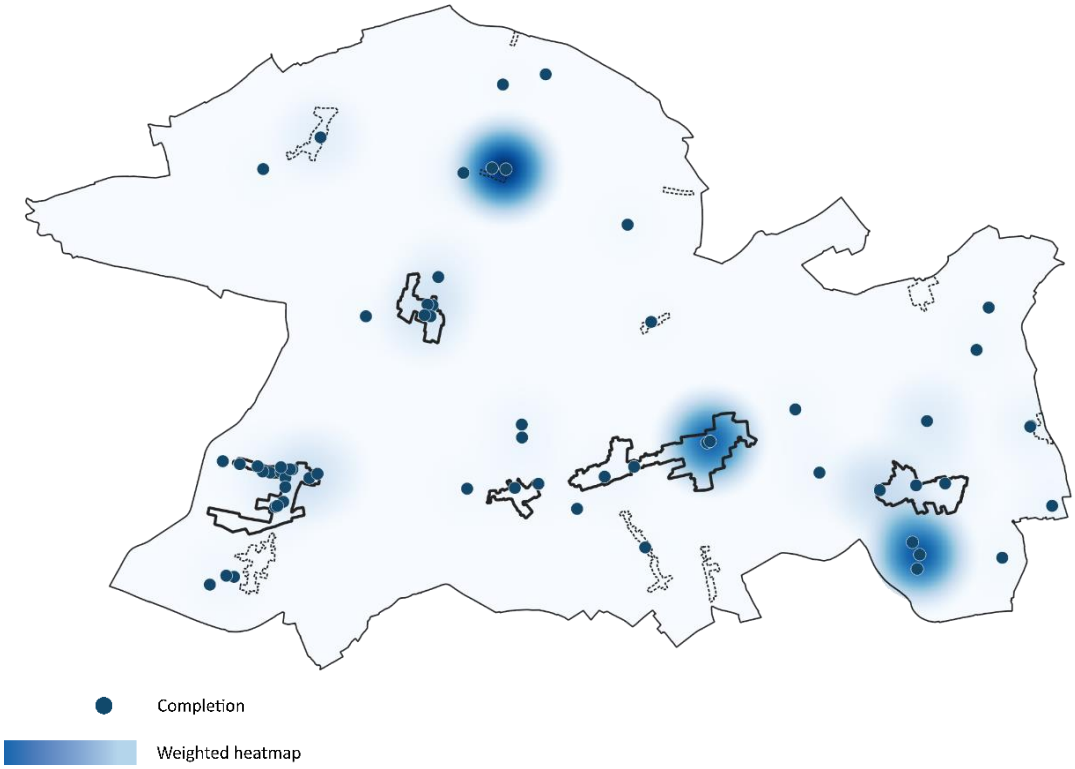
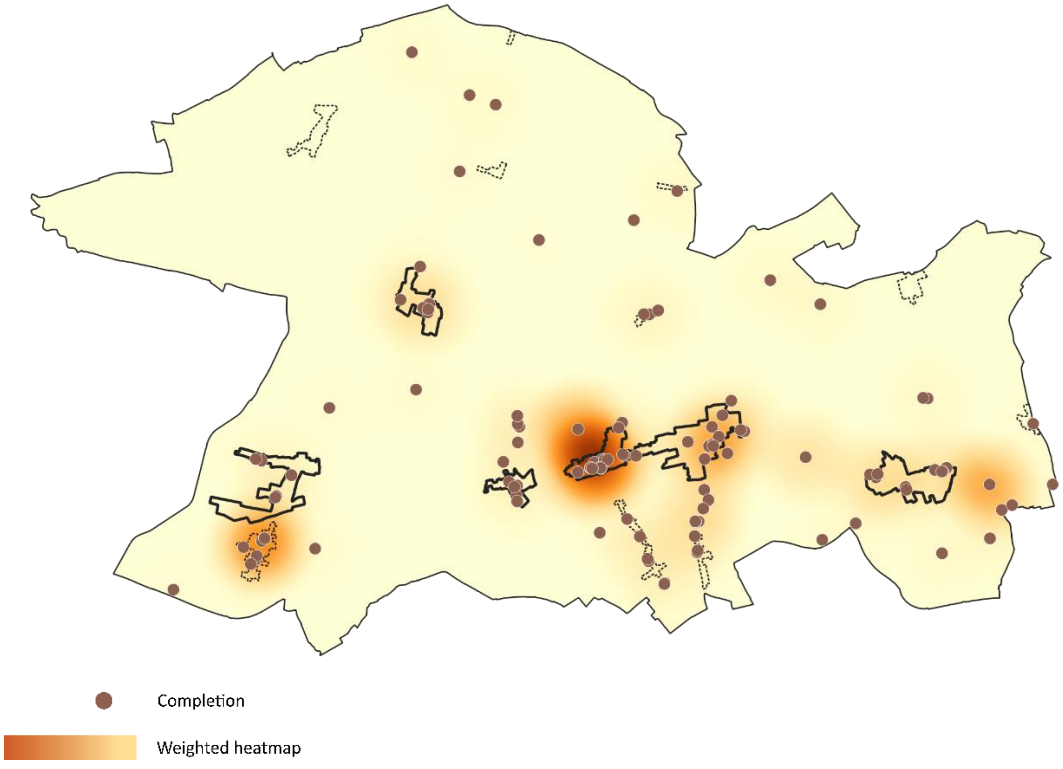


Figure 4.10 - Weighted heatmap of net A1 floorspace lost (based on completions) across the LPA over the five-year period



In respect of completions, Southall and Greenford have gained a fair number of completed applications that exhibit relatively minor net gain of A1 floorspace, whereas a small number completions located in Ealing Town Centre, Westway Cross neighbourhood centre have led to major net gain. Besides, an out-of-centre cluster of completions located in the south of Acton has also seen relatively significant net gain.

Although a small number of completions in Ealing Town Centre has brought relatively significant net gain of A1 floorspace, evident in Figure 4.9, it has also seen high concentration of completions that led to significant net loss. Besides, minor net loss in a number of completions distributed across the Northfields and South Ealing neighbourhood centres, alongside the lack of net gain of comparable concentration and scale in both areas, may indicate a loss of local retail spaces in both neighbourhood centres overall.

Out of centre development

National Policy (NPPF) establishes the sequential test which seeks to guide main town centre uses towards town centre locations first, then, if no town centre locations are available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of centre locations. Although national policy does not specify a size threshold for triggering the sequential test, it is recognised that small scale retail provision is essential to meet the needs of a neighbourhood and accordingly shouldn't be constrained by such a policy. Notably the Council's own Development Management Policy 4B seeks to ensure that no part of the borough is further than 400m from the nearest local shop. Larger retail provision (serving a wider catchment) should continue to be directed to town centres in the first instance. An analysis of larger A1 retail provision approved and completed in respect of location relative to the centres is considered to be useful, in measuring how effective the Council has been in upholding the sequential test. For this analysis a threshold of 500 sq. m. has been employed to isolate 'large' retail provision. Figures 4.11 and 4.12 show the location of large retail provision relative to the centres in respect of approvals and completions.

Figure 4.11 – Indicative (approvals) net A1 floorspace gained (above 500 sqm) over the five-year period

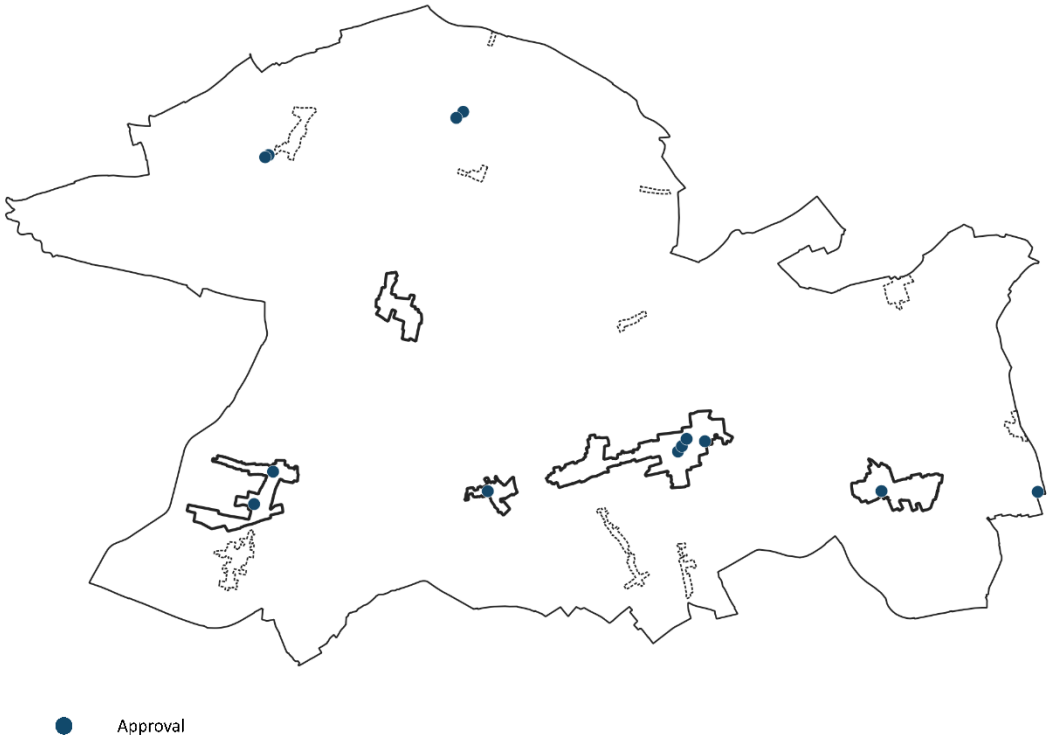
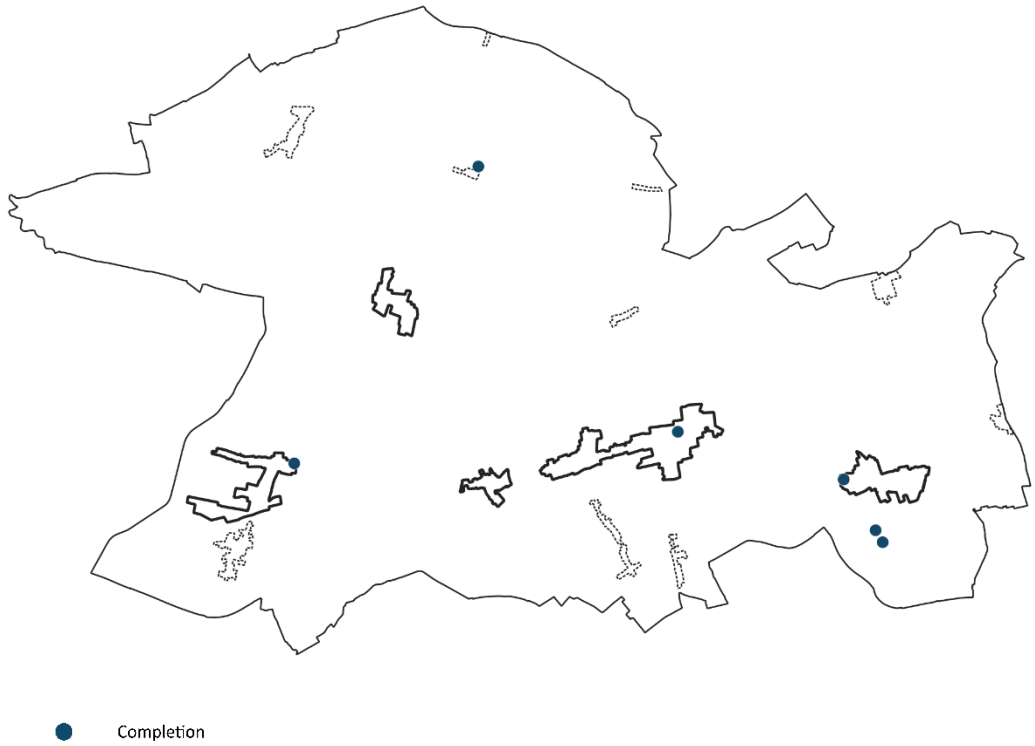


Figure 40.12 - Net A1 floorspace gained (based on completions) (above 500 sqm) over the five-year period



In respect of permissions the majority of large scale retail provision over the five reporting years is sited within or on the edge of town or neighbourhood centres. Two exceptions are however noted, which combined account for a total of 5,258 sq. m. of net A1 floorspace. The first of these accounting for 4,073 sq. m. of A1 retail space is part of the mixed-use redevelopment of the former GSK site. This scale of provision was considered acceptable in supporting the needs of the new development. A second and smaller scheme was located on the Vale in Acton.

In terms of completions, two out of centre schemes are noted, both forming part of the regeneration of the South Acton estate. These comprise a net gain of 2,490 sq. m. in 2016/17 and a further gain of 563 sq. m. in 2018/19.

Office (B1(a) Use class)

Figures 4.13 and 4.15 below shows the relative change in B1(a) office space between the town centres over the 5 reporting years, in terms of approvals and completions respectively. Figures 4.14 and 4.16 similarly presents the cumulative change by centre, in respect of approvals and completions respectively.

Figure 40.13 – Indicative (approvals) net B1(a) floorspace change in town centres by year

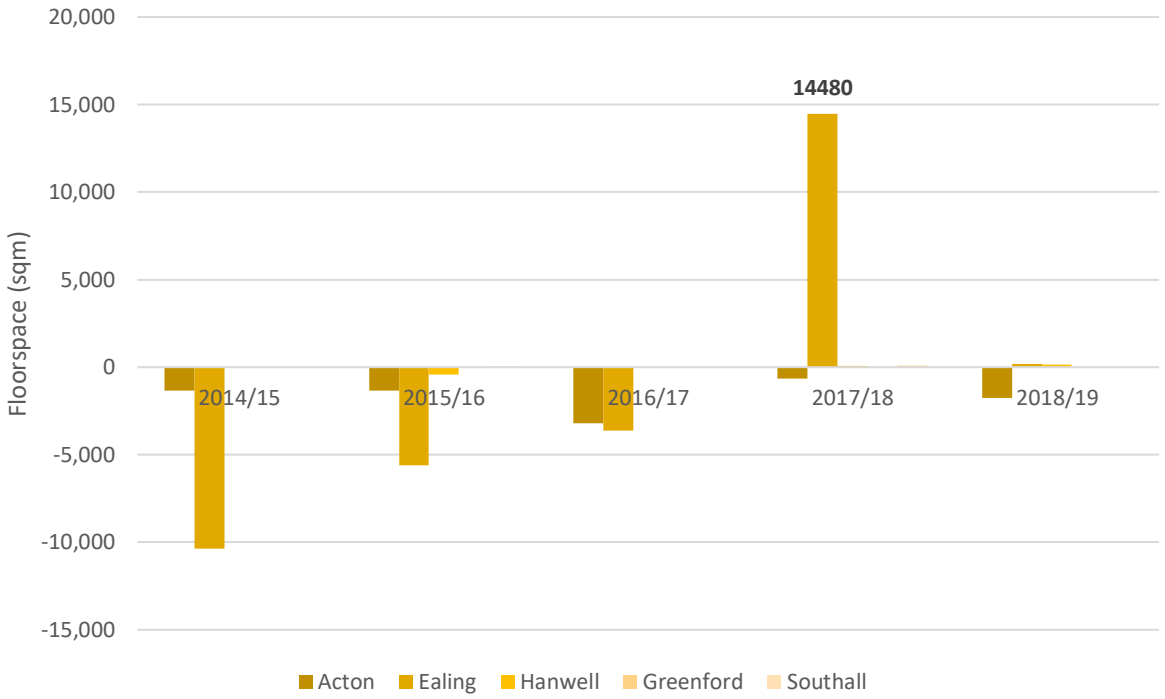


Figure 40.14 - Total indicative (approvals) net B1(a) floorspace change across town centres over the five-year period

Figure 40.15 - Net A1 floorspace change (based on completions) in town centres by year

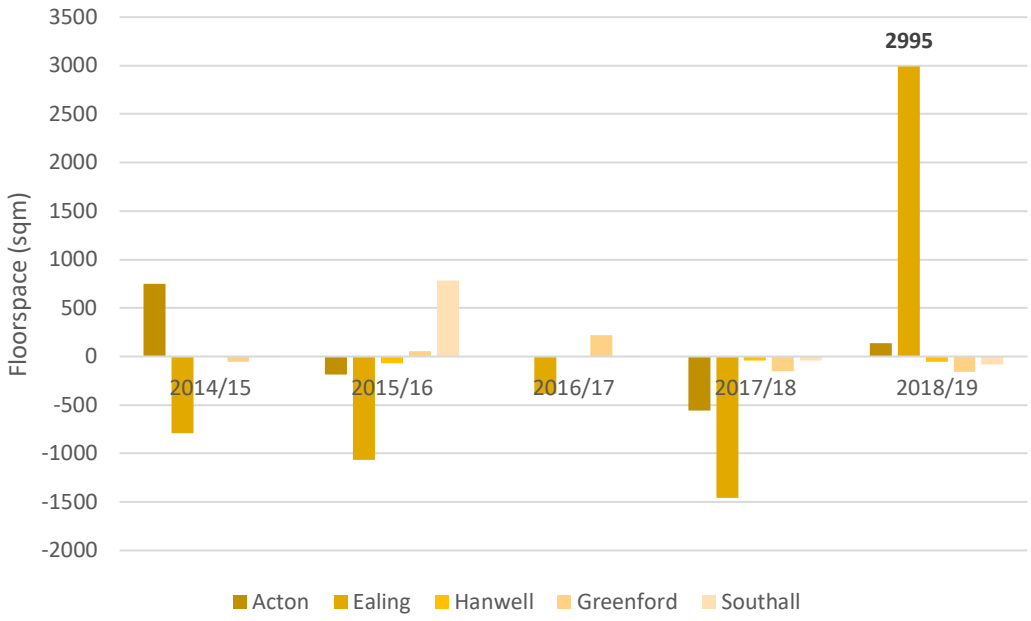
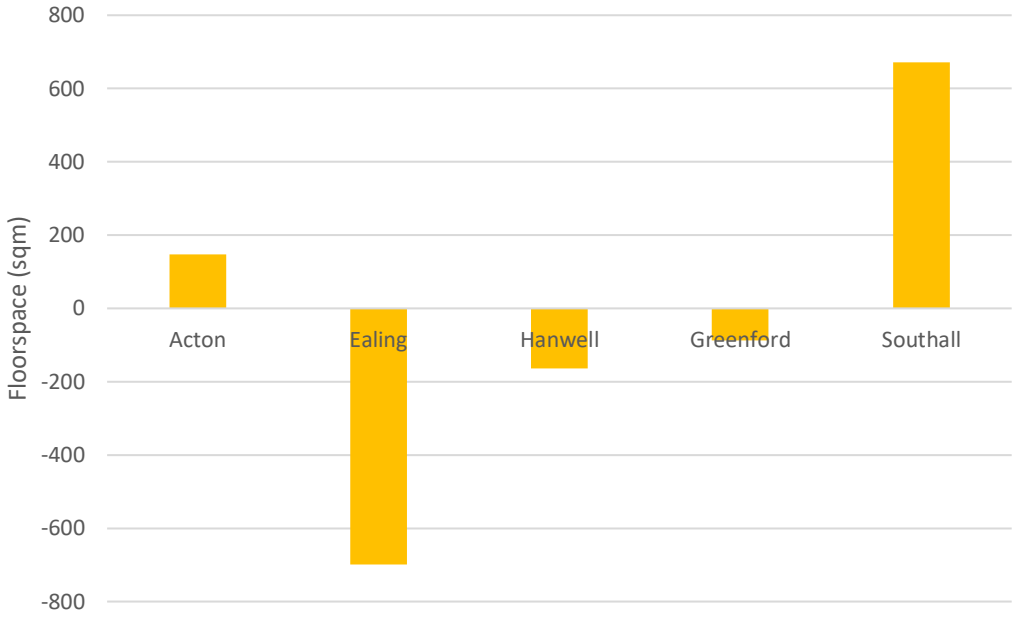


Figure 40.16 - Total net A1 floorspace change (based on completions) across town centres over the five-year period



Despite moderate to minor decrease in approved net B1(a) floorspace in Ealing Metropolitan Centre up to 2016/17, it has seen relatively significant net gain of 14,480 sq. m. in 2017/18, mitigating some of the impact of previous years' reduction. While approved net loss in Acton each year was relatively lower than in Ealing between 2014/15 and 2017/18, its accumulated net loss with the

absence of rebound that took place in Ealing has led to its indicative net loss of 8,287 sq. m. overall, the greatest among all town centres.

On the other hand, while there had been continued reduction in net A1 floorspace in Ealing up until 2017/18, significant increase in recent year, accounting for 2,995 sq. m. of net gain, mitigated some of the impact, resulting in moderate net decrease overall. When comparing with approval data, such increase may constitute a delayed consequence of the significant rise in net gain through approvals in 2017/18, acknowledged in the previous section. Besides, although moderate net gain of A1 floorspace through completion is evident in Acton during 2014/15, subsequent reduction in 2015/16 and 2017/18 has contributed to its minor net gain over the five-year period despite minor net gain achieved in 2018/19.

Intensity of activity

As well as examining the change in floorspace by area in aggregated terms, it is also useful to examine the spatial intensity of change in respect of the number of schemes and scale of change. The maps below illustrate the spatial relationship between these two measures. Individual schemes are captured as points and any clustering is visibly evident. The scale/magnitude of change (in floorspace terms) is illustrated through shading. Schemes resulting in net losses and gains are illustrated independently on separate maps.

Approvals

*Figure 40.171 - Weighted heatmap of indicative net B1(a) floorspace **gained** across the LPA over the five-year period*

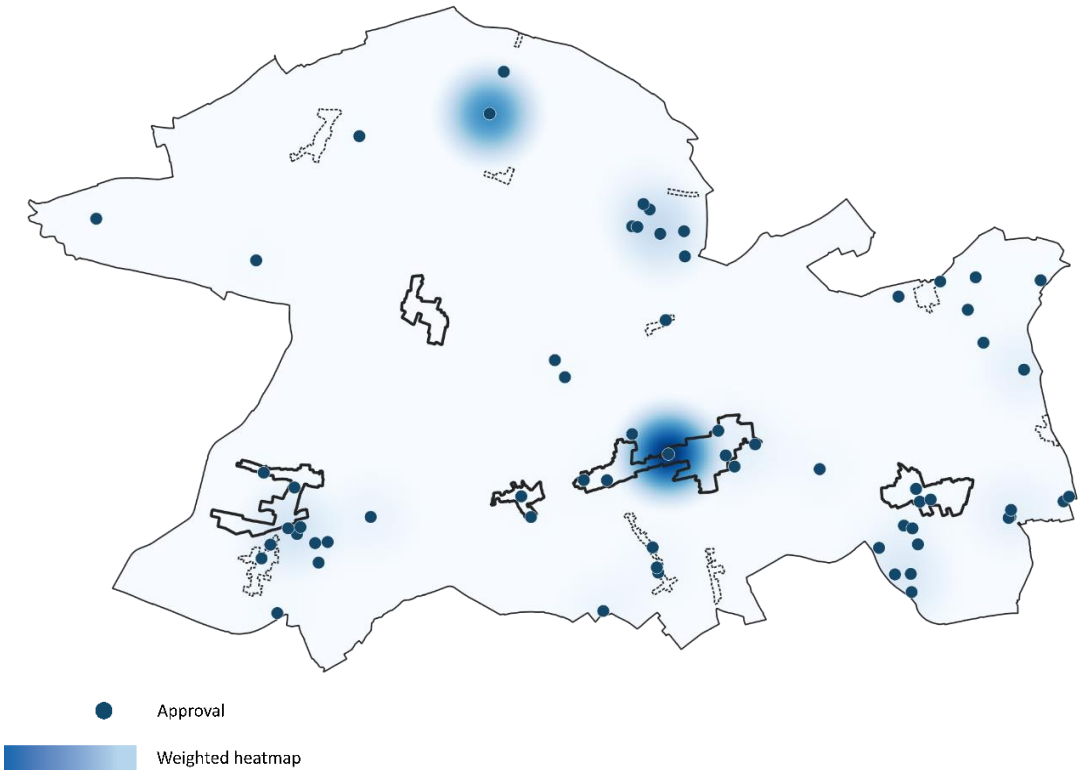
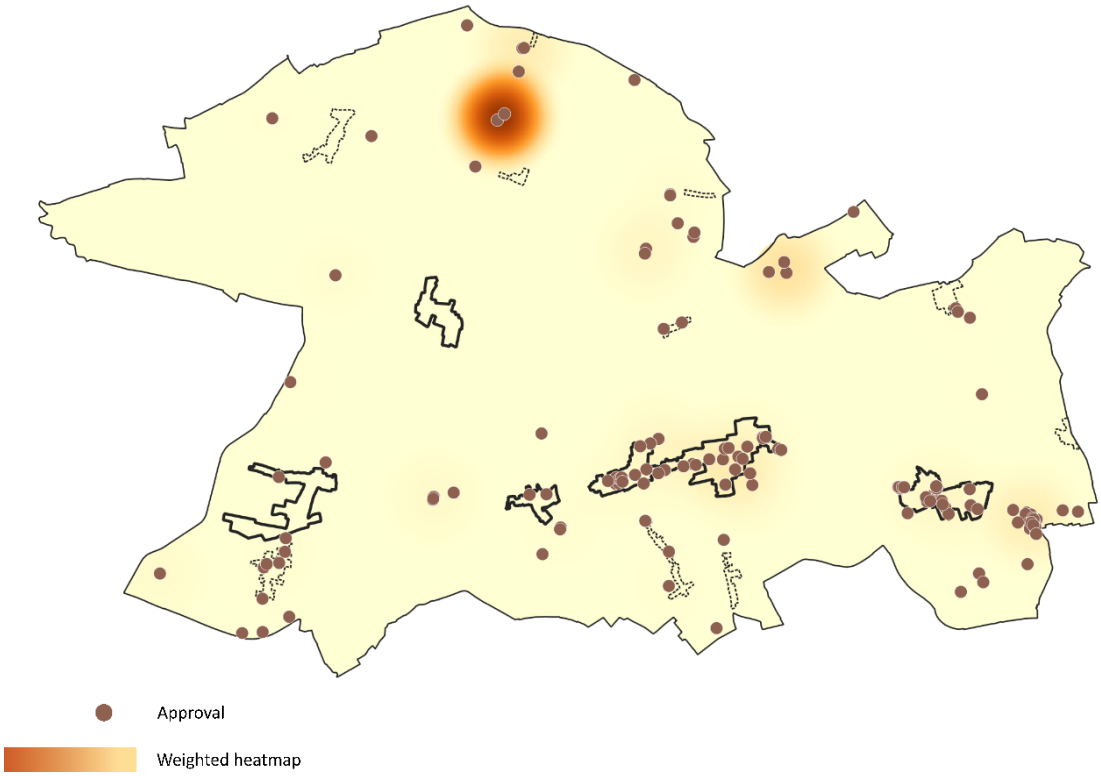


*Figure 40.182 - Weighted heatmap of indicative net B1(a) floorspace **lost** across the LPA over the five-year period*



A single approval located in the centre of Ealing has shown significantly greater net gain of B1(a) floorspace. While a small number of approvals with relatively minor approved net gain can be seen in Acton, Southall, Northfields and King Street, loose clusters of minor net gains are also evident outside of town and neighbourhood centres. In particular, an out-of-centre application approved in 2014/15 with the second greatest indicative net gain of 11,236 sq. m. is located on Greenford Road, where there is a former out-of-centre retail cluster. Considering the aforementioned influence of policy framework in the past, this could be due to the legacy of such policy context.

A relatively large number of approvals with minor indicative net loss of B1(a) floorspace can be seen in Acton, Ealing Town Centres and King Street Neighbourhood Centre, with an out-of-centre cluster of this kind located in the east of Acton. On the contrary, an out-of-centre cluster which contains a small number of approvals with significantly greater indicative net loss is evident on Greenford Road where there has been an approval with major indicative net gain, demonstrated in Figure 4.18. However, considering the magnitude of change associated with the two approvals within this cluster which account for 62,000 sqm and 69,330 sqm of indicative net loss, the observed indicative net gain did not balance out such losses and that there is an indicative net loss overall.

Completions

Figurer 40.19 - Weighted heatmap of net B1(a) floorspace gained across the LPA over the five-year period

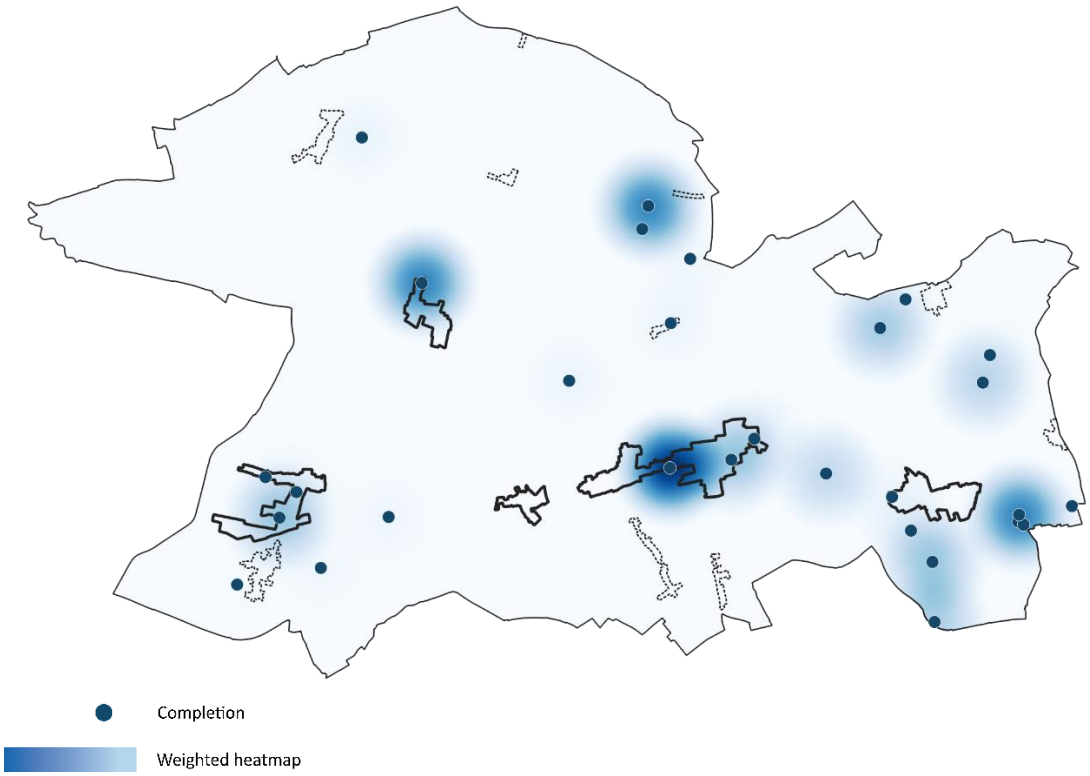
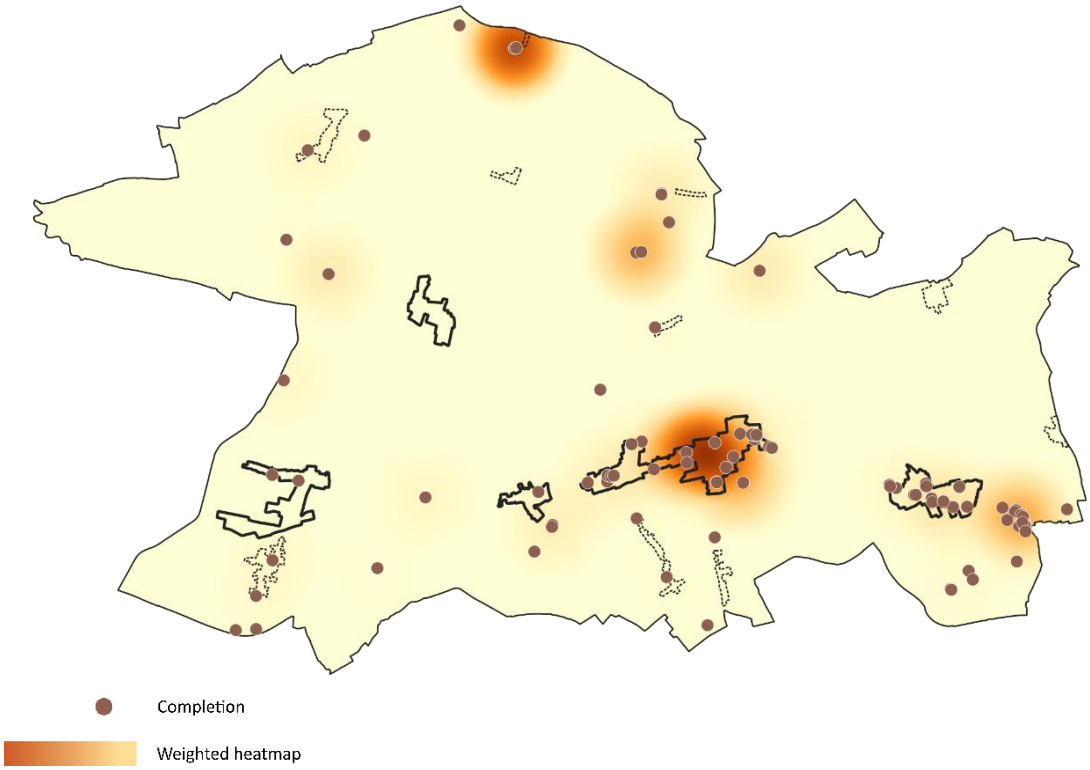


Figure 40.20 - Weighted heatmap of net B1(a) floorspace lost across the LPA over the five-year period



Both Ealing and Greenford have seen a small number of completion(s) that led to relatively significant net gain of B1(a) floorspace. This is also evident in an out-of-centre cluster located in the east of Acton, though the volume of net gain due to this cluster is not as large as the single scheme within Ealing. The relative intensity of this cluster is mainly due to a redevelopment scheme, which involves demolishing a six-storey office building. A small number of completions with minor net gain is also evident in Southall and other parts of the LPA, demonstrating a sparse distribution in general.

Although moderate concentration of completions leading to net loss of B1(a) floorspace is evident in both Acton and Ealing, the scale of such loss is relatively greater in the latter. In particular, Ealing becoming a hotspot was partly due to demolition of an existing office building for the redevelopment scheme identified in Figure 4.19 that has eventually regained greater volume of office space in comparison to the demolished structure. The two other completions that contributed greatly to the hotspot include the temporary conversion of 4,944 sqm office space to D1 mix use for two years and a major residential mixed-use redevelopment scheme at Dickens Yard with a net loss of 7,866 sqm B1(a) floorspace. Another hotspot located on the edge of Sudbury Hill neighbourhood centre also demonstrates major net loss of office floorspace but through a smaller number of completions.

Class O

Figure 40.21 – Indicative (approvals) net loss of B1(a) floorspace due to change of use (Class O) over the five-year period

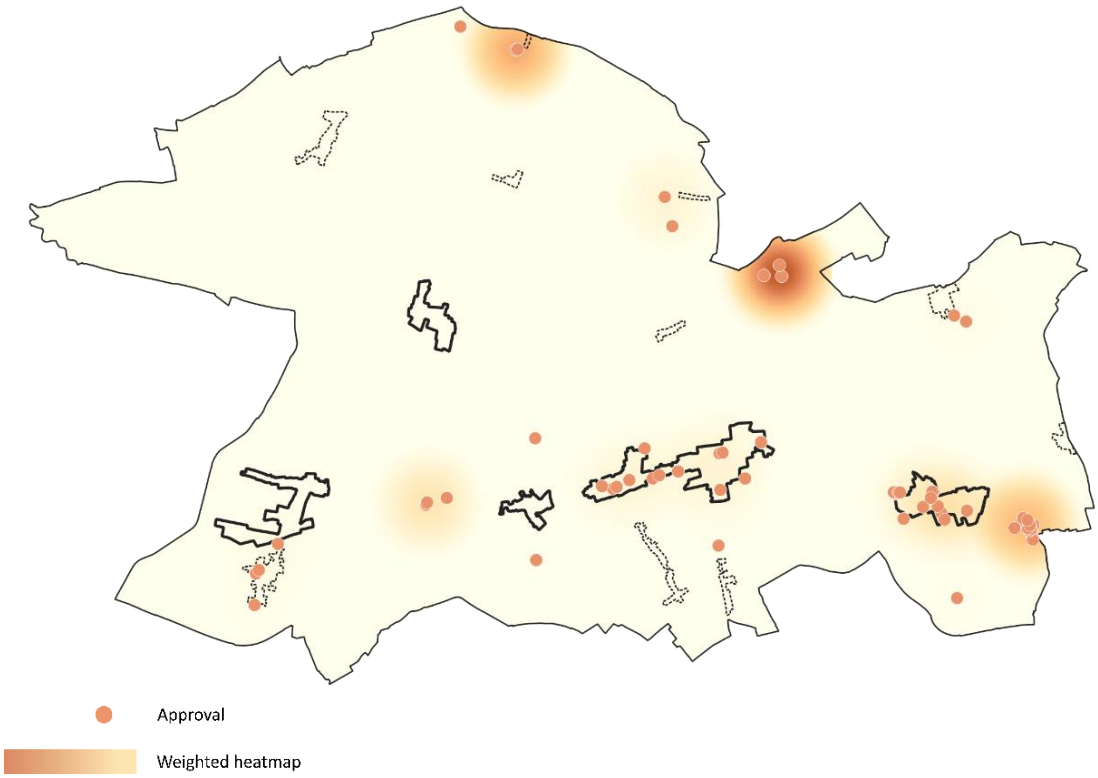
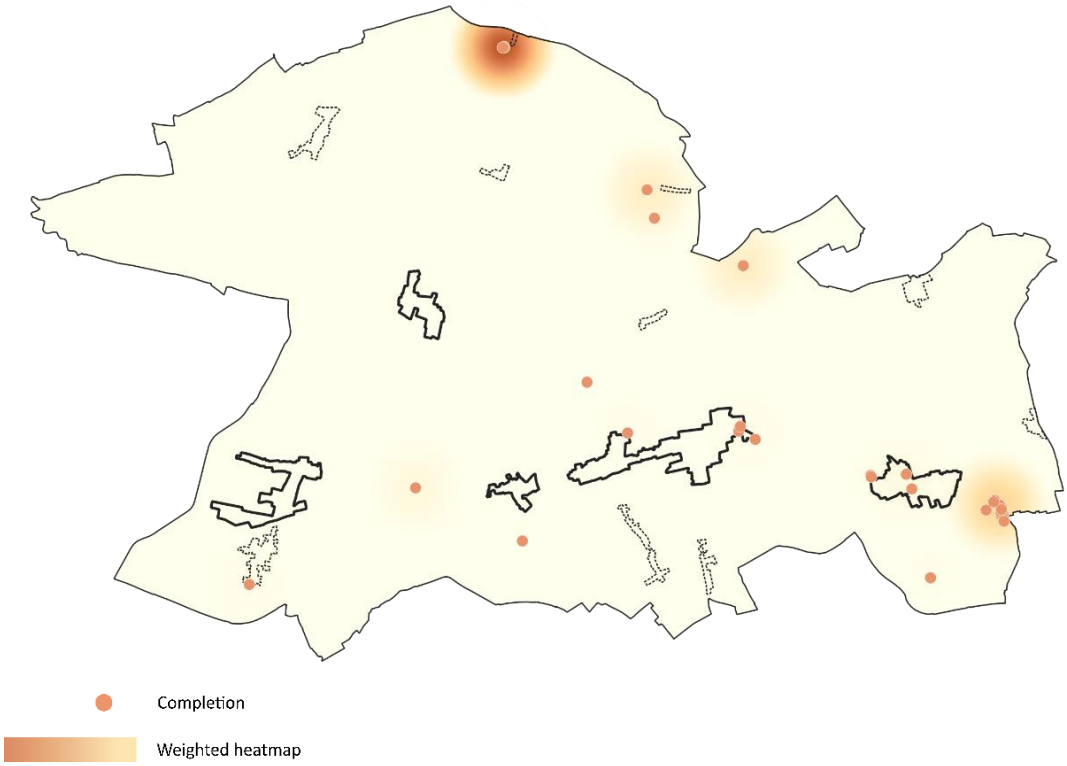


Figure 40.22 - Net loss of B1(a) floorspace (completions) due to change of use (Class O) over the five-year period



Clusters of a relatively small number of approvals located outside of town and neighbourhood centres, in the north and southeast of the authority, have led to relatively significant indicative net loss of B1(a) floorspace through change of use (Class O). More specifically, the Westgate House permitted development contributed the most to the northern hotspot, which has also led to the second greatest indicative net loss of, 14,062 sqm B1(a) floorspace among all approvals captured in Figure 4.19. In contrast, while it is evident that there were a fair number of approvals in Acton and Ealing Town Centres leading to an indicative net loss over the years, the scale of such loss for each individual approval is smaller than the former clusters. When compared to Figure 4.21, one could also suggest that permitted development through change of use (Class O) accounted for a proportion of the approvals with minor net loss of B1(a) floorspace concentrating in these two town centres and the two out-of-centre clusters, meaning that small-to-medium sized office space may have been lost as a result during the five-year period.

The spatial distribution of intensity for completions resembles to some extent trends observed in approvals, demonstrating spatial unevenness in the location and volume of net loss of office space due to Class O permitted development. More specifically, conversion of the Kellogg Tower in 2018/19 has seen the greatest net loss of 15,236 sq. m. B1(a) floorspace, contributing the most to the hotspot near Sudbury Hill observed in Figure 4.22. To illustrate the relative magnitude of such loss, the completed application as part of the out-of-centre cluster in the east of Acton saw the second greatest net loss of 2,590 sq. m. This shows significant disparity in the magnitude of net loss and impact of the expanded permitted development right since 2015 in different local areas.

5. Social Infrastructure

Introduction

The Local Planning Authority through its plan making and decision taking functions aims to ensure that the social infrastructure needs of the authority's communities are met. Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. It includes health provision, education, community, play, youth, early years, recreation, sports, faith, criminal justice and emergency facilities. For the purpose of monitoring (and specifically in respect of the monitoring period), whilst it may not be fully comprehensive, it is generally easiest to think of it in terms of two use categories - D1 (non-residential institutions, such as schools and health facilities, libraries) and D2 (assembly and leisure, such as swimming baths, outdoor recreation facilities, cinemas and places of worship). It should be noted that at the time of publication and beyond the monitoring period, class D1 and D2 have been removed, and activities previously falling within them have been reclassified.

As with other chapters this section starts with a brief contextual update, before reporting on development activity, utilising approvals and completions data captured in the London Development Database.

Evidence Base

To fully understand existing and future infrastructure needs, and to plan appropriately for these, the Council must prepare a number of evidence base documents, including an Infrastructure Delivery Plan (IDP).

The IDP identifies what, when and where infrastructure is needed to support the delivery of planned growth, and assesses the costs of providing infrastructure, existing funding sources and any funding gaps. The preparation of an IDP is an iterative process which informs each stage of the plan making process, as well as informing implementation. The IDP also forms of an essential component of the evidence base for the development of a local Community Infrastructure Levy (CIL).

To support the preparation of the Council's Development Strategy (2012), an Infrastructure Delivery Plan and associated Infrastructure Delivery Schedule (IDP/IDS) was prepared. This was originally published in September 2010, with a second version published in July 2011. Various updates have also been made to the IDS, with the most recent version being published in April 2016 as part of the Ealing Infrastructure and Funding Gap Report as evidence to support a borough CIL.

During 2020 work has commenced on preparing a new Infrastructure Delivery Plan for the borough, and the Council has recently prepared an Infrastructure Baseline Report. In addition the Council are also working with neighbouring boroughs on the preparation of a West London Strategic Infrastructure Delivery Plan, which will complement the local IDP.

Change in Floorspace

Change in D class floorspace for each reporting year is detailed below. It should be noted that with the exception of 2014/15, the floorspace figures and analysis below excludes development proposed/delivered within that part of the borough (principally Park Royal) now covered by the Old Oak and Park Royal Development Corporation (OPDC).

As noted above recent changes to the Use Classes Order (which came into force on the 1st September 2020), removed classes D1 and D2. Those activities previously falling with use classes D1 and D2 have now been moved into a number of newly created classes including class E, F1 and F2. A number of former D class activities have also been moved into the sui generis category, meaning that they belong to no specific class. This recalibration of the classification of social infrastructure activities alongside further changes to the General Permitted Development Order extending rights to change from these uses to other uses, will make it much more difficult to monitor and manage changes in future years.

2014/15

During the year a total of 73 schemes were approved, which if implemented would result in a gain or loss of D1 (non-residential institutions) or D2 (Assembly and Leisure) floorspace. Combining both use classes a modest net gain was achieved of 3,199 sq. m. Most of these changes related to D1 uses, whereas changes to D2 uses only amounted to a small portion. Despite the main activity relating to D1 uses, where 53 schemes would contribute to the delivery of 22,275 sq. m. of new D1 floorspace, this was cancelled out by even greater losses accounting for 24,808 sq. m.

Major permissions during this monitoring period included the provision of a two-storey teaching centre (3,000 sq. m.) at the existing Ealing and West London College Campus in Southall. At the time of writing this scheme has not been implemented and permission has now lapsed. A new replacement school was also permitted for Springhallow School, which was more than double the size of the original school securing an uplift of 2,405 sq. m. of floorspace.

In respect of completions fewer schemes (43) were completed which resulted in a change in D1 or D2 floorspace, although cumulatively resulted in a net gain of 6,613 sq. m. of D1 and D2 floorspace. As with permissions the main activity related to D1 uses, with a significant number of these relating to schools. Gains in floorspace were achieved through extensions at Gifford Primary School (+1,252 sq. m.) and Grange Primary School (+1,214 sq. m.), as well as more modest extensions at various other schools throughout the borough. Some losses were also experienced during the monitoring period including the change of use of educational space (teaching space for the university) to student accommodation at Grove House. Whilst the policies typically discourage such losses, the applicant was able to demonstrate that such space was surplus to need having been vacant for over 2 years, and accordingly could be released from a social infrastructure use, whilst still securing a complementary use in the form of student accommodation.

2015/16

During 2015/16 a total of 61 schemes were approved which cumulatively would result in a significant net gain of 20,433 of D1 and D2 floorspace. Four schemes secured a net increase in

excess of 2,000 sq. m. each of D1 floorspace. The largest of these involved the temporary change of use of 4,944 sq. m. of office floorspace to education space at Villiers House. Another application involved the provision of a replacement school (St John First and Middle School) as part of the Green Man Lane regeneration scheme. Substantial extensions were also approved at Brentside High School and Elthorne High School. A proposal at the TRS building in Southall also secured a fairly substantial increase (1,584 sq. m.) in D2 space, although this involved a change of use of the ground and first floor of the building from a library/business development community centre (D1) to a gym (D2). A number of losses were also recorded too. Two alternative schemes were also approved involving the change of use of a medical centre on a site at Gunnersbury Lane to a residential use.

In terms of completions 37 schemes were completed involving a change in D1 or D2 floorspace, which cumulatively resulted in a modest net gain of 3,829 sq. m. of floorspace. Whilst any gain is positive, this was the lowest recorded change of any of the reporting years. Again as with permissions the main area of activity related to change in D1 space, with there being much less activity relating to D2 uses. In relation to change in D2 space it is noted that a modest net loss was recorded (-2,703 sq. m.). Significant gains in D1 floorspace during the year included extensions at Horsenden Primary School and Castlebar Special School. There were relatively few losses recorded during the year, although the most significant one involved the change of use of the Boots Health and Fitness Centre at Westway Cross to non-food A1, recording a loss of 3,186 sq. m. of D2 space.

2016/17

A total of 56 applications were approved during 2016/17 which if implemented would result in a change in the amount of D1 or D2 floorspace. Combining both use classes together a net increase of 30,803 sq. m. was secured, an uplift on previous years, and the largest gain of any of the five reporting years. A significant portion of this gain (11,878 sq. m.) came from a single approval for a new sports facility (D2) at Warren Farm. Other notable gains included the change of use of a sports pavilion, and the installation of temporary modular units for school use for a period of 2 years at Eversheds Sports Ground, and the provision of D1 space as part of phase 6 of the Acton Gardens Masterplan. Notable losses permitted during the year include the redevelopment of a former cinema site to provide 39 flats at Sudbury Heights.

46 permissions were completed during the year which resulted in either a gain or loss of D1 or D2 floorspace. Combined, this resulted in a net gain of 20,843 sq. m. of floorspace, and the largest reported gain of any of the five reporting years. Substantial completions during the year included the temporary change of use of office as education space at Villers House, a three-storey addition at Elthorne High School and the provision of a replacement pool at Springhallow School. All such schemes were previously reported as permissions in earlier monitoring periods. The only significant recorded loss involved the conversion of a library/community space at the TRS building in Southall. Whilst this resulted in a loss of D1 space as it involved the change of use to a gym, it secured an equivalent gain in D2 space.

2017/18

During 2017/18 a total of 50 applications were approved which involve a gain or loss of D class floorspace. Combining both D categories, this would result in a net gain of 23,515 sq. m. of floorspace if implemented. As with previously reported approval figures it should be recognised that

not all these permissions will necessarily be delivered. Net gains were both achieved in relation to D1 and D2 space, although as with previous years, the majority of applications relate to changes in D1 space, as opposed to D2 space. Notable permissions include the provision of a new secondary school at Twyford Abbey, which if implemented would secure 6,881 sq. m. of new D1 space. Significant (6,784 sq. m.) new D1 and D2 floorspace was also secured as part of the redevelopment of the former GSK site. A minor amendment was also approved in relation to the Dickens Yard redevelopment, which if implemented would secure additional D1 and D2 space including a health spa. The recorded losses during the year were relatively modest. The most significant loss involved the change of use of a respite facility (D1) to provide an emergency hostel accommodation (C2) at Heller House in Southall.

In respect of completions a total of 46 schemes were implemented which has resulted in a net gain of 6,790 sq. m. of D class floorspace. A significant proportion of this change arose from one scheme, involving the replacement of a larger (3,937 sq. m.) primary school and nursery (St Johns), and flexible community space (766 sq. m.) as part of the redevelopment of Green Man Lane. Whilst a number of losses were recorded, the only one of significance, involved the partial replacement of hospital buildings with residential units at the Penny Sangam and Southall-Norwood Hospital in Southall, resulting in a loss of 1,223 sq. m. of D1 floorspace.

2018/19

During 18/19 a total of 33 applications were approved which involve a gain or loss of D class floorspace. D1 and D2 combined this would result in a net gain of 12,813 sq. m. of D class floorspace if implemented. Whilst a net gain in D class floorspace is clearly positive, this growth is smaller than in the past three years, and notably the number of schemes resulting in a gain or loss was much lower than in any of the previous reporting years. Looking at D1 and D2 separately, positive net gains were recorded for both D categories, but the reported changes in relation to D2 were very small (only 8 schemes were permitted which resulted in a change). More substantial gains (12,763 sq. m.) were recorded in relation to D1 use. Notable permissions include the approval of a new 6.5 form entry secondary school on the former Barclays Sports Ground, comprising 10,024 sq. m. of D1 floorspace. A second permission for a 4 form entry secondary school at the former King Fahad Academy (Ealing Fields) was also approved securing 6,180 sq. m. of floorspace. A third secondary school was also approved on the former Ealing Hammersmith and West London College Site.

In terms of completions a total of 27 schemes were implemented, which has given rise to a net gain of 19,095 sq. m. of additional D class floorspace. Although the number of schemes resulting in a change was smaller than in previous reporting years, the net gain in floorspace was the second highest recorded year. The most significant gains were recorded in relation to D1 uses, although of note there was no reported D2 losses at all during this year. Significant gains in relation to D1 uses included various school development. These included an extension at Mayfield Primary School. Extended capacity in the form of a new two form entry was completed in a new block at Greenford High School (comprising 2,755 sq. m. of D1 floorspace). A replacement nursery and 3 form entry primary school was also secured at St Johns (Green Man Lane). An extension was also completed at Brentside High School creating 2,892 sq. m. of additional teaching space. As part of phase 6 of Acton Gardens a new community/medical centre was also secured.

Table 5.1 – Change in D class floorspace approved over monitoring period

Year	D1 Floorspace Lost	D1 Floorspace Gained	D1 Net	D2 Floorspace Lost	D2 Floorspace Gained	D2 Net	D Class overall change (Net)	Number of schemes recording a gain or loss
2014/15	24808	22275	-2533	493	6225	5732	3199	73
2015/16	10,000	28,290	18,290	673	2,816	2143	20,433	61
2016/17	7660	28107	20447	4752	15108	10356	30,803	56
2017/18	5280	22102	16822	1588	8281	6693	23515	50
2018/19	8858	21621	12763	1563	1613	50	12813	33

Table 5.2 – Change in D class floorspace completed over monitoring period

Year	D1 Floorspace Lost	D1 Floorspace Gained	D1 Net	D2 Floorspace Lost	D2 Floorspace Gained	D2 Net	D Class overall change (Net)	Number of schemes recording a gain or loss
2014/15	5559	12192	6633	3762	3742	-20	6613	43
2015/16	8725	15257	6532	3492	789	-2703	3829	37
2016/17	9838	28256	18418	268	2693	2425	20843	46
2017/18	3893	9368	5475	124	1439	1315	6790	46
2018/19	3040	19512	16472	0	2623	2623	19095	27

Update on selected social infrastructure projects

In terms of specific community infrastructure, in recognition of the need for additional school places in the borough, the Council prepared a standalone Planning for Schools DPD which was adopted in May 2016. This DPD responded to the need to provide a further additional 3.5 Primary forms of entry and 19 Secondary forms of entry, beyond the original expansion programme. The DPD allocated 8 sites to accommodate new schools or expansions to existing schools.

Progress in relation to the delivery of additional capacity on these sites is outlined in table 5.3 below.

Table 5.3 – Progress of school allocations

Site Reference	Site	Type of Provision	Potential FE	Progress Status
S-ACT2	Acton Park Depot, The Vale, Acton	New primary	2	Completed and opened in September 2015.
S-HAN4	42 Lower Boston Road, Hanwell	Primary Bulge	0	No progress
S-HAN1	Eversheds Sports Ground, Hanwell	Secondary temporary expansion (Ealing Fields)	2	Completed
S-GNP2	Land adjacent to Greenford High School	Secondary expansion	2	Permission given in June 2017. Completed in August 2018.
S-EAL4	Former Barclays Sports Ground (Ada Lovelace School)	New secondary	6.5	Planning Permission secured November 2018. Work commenced in January 2019. School opened in September 2020.
S-EAL6	Former King Fahad Academy (Ealing Fields School)	New secondary	4	Planning Permission secured December 2018. School opened in September 2020.
S-ACT7	Land rear of Twyford High School	Secondary temporary expansion / bulge	0	No progress
S-ACT8	Acton College (Ark Soane School)	New secondary	6	Planning Permission secured for in Nov 2018. Works commenced in 2019 and opening is anticipated for September 2021.

6. Green Space

Introduction

As well as providing an overview of change in relation to green/open spaces in the borough, this section seeks to review the effectiveness of policies in the development plan in protecting and enhancing the network of open space in the borough. Change can be measured in terms of the spatial extent of designation and associated indicators, and also in terms of development activity.

Change in Designated Areas and Policy Context

Change in the extent of open space designations can provide a useful marker of the effectiveness of planning policies in safeguarding and enhancing open space, particularly where these revisions to the quantum of open space have been proceeded by development. It can also be indicative of the priority given to protecting and enhancing open space in the borough. Establishing a baseline in relation to existing designations will also provide a marker to measure change overtime in future monitoring reports.

As part of the Council's Green Space Strategy (published 2012) a full audit of all open space in the borough was conducted including land which was not previously formally designated as a category of open space. Open space falling into the following categories were reviewed and assessed: Green Belt, Metropolitan Open Land, Public Open Space, Community Open Space, Green Corridor and Heritage Land. In addition, a separate review of sites with nature conservation value was undertaken jointly with the GLA. Both processes recommended significant changes to the existing network. The vast majority of these changes were taken forward and formalised through the adoption of the Development Strategy in April 2012. A small set of further changes were also introduced through the adoption of the Development Management/Sites DPDs in December 2013.

More recently and during this monitoring period, a small handful of changes have arisen through the adoption of the Planning for Schools DPD in May 2016. These include the partial de-designation of Metropolitan Open Land and Public Open Space at Acton Park Depot (a loss of 0.42ha), the partial de-designation of Metropolitan Open Land and Community Open Space at Barclays Sports Ground (1.48ha), the partial de-designation of Metropolitan Open Land and Community Open Space at Eversheds Sports Ground (0.28ha), and the de-designation of Community Open Space at Twyford High School (a loss of 0.15ha). In addition there was a minor erratum involving the deletion of a duplicate polygon relating to Warwick Dene POS (an adjustment of 0.29ha). The table below provides area figures for each open space designation as adopted previously under the 2004 UDP, and as a comparator updated area figures as amended through the Council's various Local Plan documents.

Table 6.1 – Change in the extent of open space designations

Open Space Type	Area (ha)		
	UDP (2004)	Local Plan (Dec 2013)	Local Plan (May 2016)
Green Belt	332.319	308.267	308.267
MOL	847.611	867.405	865.230
Public Open Space	609.32	613.306	612.601
Community Open Space	116.031	451.408	449.496
Heritage Land	65.339	80.536	80.536
Total	1,970.62	2,320.922	2,316.13

Table 6.2 – Change in the extent of SINC designation by grade

SINC Grade	Area (ha)	
	UDP (2004)	Local Plan (Dec 2013)
Site of Metropolitan Importance	Not Known	273.836
Site of Borough Importance Grade 1	Not Known	471.916
Site of Borough Importance Grade 2	Not Known	259.14
Site of Local Importance	Not Known	65.9438
Total	502.909	1,070.83

Tables 6.1 and 6.2 above illustrate that the extent of areas formally designated as open space has increased from that established in the 2004 UDP, although in some more recent years there has been a modest reduction in certain designations, principally arising following the adoption of the Planning for Schools DPD in May 2016 as detailed above.

As will be evident from table 6.2 significant changes in relation to the overall extent of SINC sites were formalised through the adoption of the Local Plan in 2012 and 2013. It has not been possible to calculate the area of the 2004 network by grade as the GIS data is unavailable, and so only a total figure is given. Boundary changes were made to in excess of 40 sites (mostly to increase site area), and a considerable number of new sites (30 plus) were also identified. These changes have resulted in a doubling of the area formally identified as being of nature conservation value.

The Council commenced work on a new review of its SINC network in 2017, and this review is still underway at present. It is probable that this review will result in some further recommended changes to the list of sites designated as SINC's and their grading, and any revised network will be identified and given effect through a new Local Plan.

Whilst the extent of areas formally afforded protection as open space has changed in recent years, in most cases this has arisen through the reclassification of open space, rather than the through forming new space.

Access to Open Spaces

A key objective of the green space policies in the Development Strategy is to improve access to the existing network of open space across the borough, and monitoring the effectiveness of policies in achieving this goal is important. This could be achieved through a number of means including: the

creation of new open space, the reclassification of existing space, and physical works to improve access to existing open space. Access to open space is not equal throughout the borough with significant spatial variations existing. Access can be expressed in terms of physical proximity to open space and in terms of the quantity of open space per head of population by geographical area (i.e. by ward). Those areas considered to be deficient in relation to POS are mapped within the Council's Green Space Strategy, and on the Council's Policies Map. Table 6.3 below identifies the extent of the borough which is considered to be deficient in access to POS, based on the catchment areas identified for each type of public open space within the Public Open Space hierarchy defined in the 2021 London Plan. Table 6.4 also identifies the amount of open space by head of population for each ward. This table will be updated in the Final AMR Report to account for the modest adjustments to POS noted above, and to reflect the latest published population projection figures.

Table 6.3 – Extent of park deficiency by severity

Severity of deficiency	Extent (ha)	Percentage of Borough
Local Park Deficiency	2,589.60	47%
District Park Deficiency	1,794.74	32%
Local and District Park Deficiency	1,044.6	19%
Metropolitan Park Deficiency	153.32	3%

Note these figures add up to more than 100% as an area can be deficient against more than one POS size category.

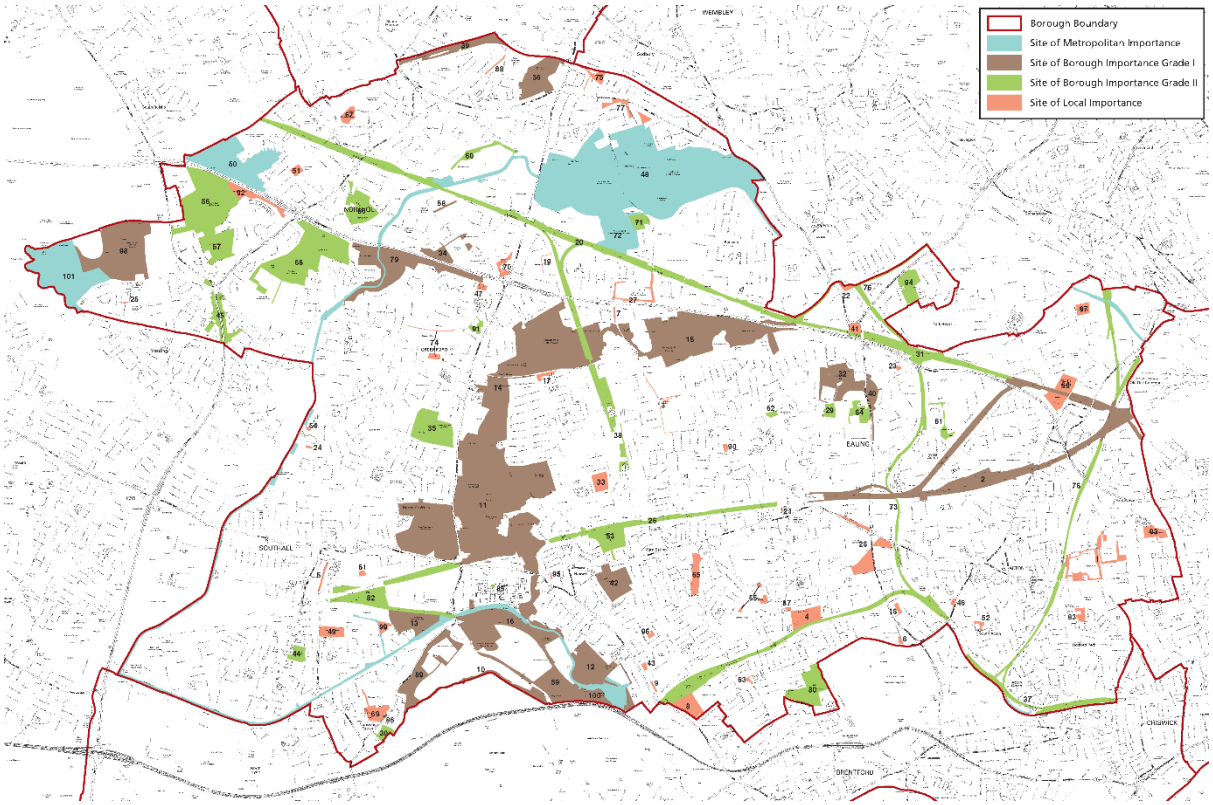
Table 6.4 - Public Open Space (POS) per 1000 people over the plan period

Ward	POS (ha)	Area (ha)	POS by ward area	Population 2011	POS per 1000 people	Population 2016	POS per 1000 people	Population 2021	POS per 1000 people	Population 2026	POS per 1000 people
Southall Broadway	10.26	162.1	6.33%	13,787	0.74	17,102	0.60	20,042	0.51	24,843	0.41
Southall Green	7.51	157.5	4.77%	13,574	0.55	14,345	0.52	14,829	0.51	15,512	0.48
Norwood Green	35.14	378.2	9.29%	13,071	2.69	13,211	2.66	13,116	2.68	13,657	2.57
Dormer Wells	16.73	224.8	7.44%	13,710	1.22	13,927	1.20	13,885	1.20	14,246	1.17
Lady Margaret	22.79	153.7	14.83%	13,188	1.73	13,350	1.71	13,261	1.72	13,246	1.72
East Acton	15.66	425.7	3.68%	18,668	0.84	19,672	0.80	20,355	0.77	21,244	0.74
Acton Central	12.28	177.1	6.93%	14,343	0.86	14,739	0.83	14,888	0.82	15,323	0.80
South Acton	6.18	170.9	3.62%	14,516	0.43	15,919	0.39	17,039	0.36	18,021	0.34
Southfield	9.7	142.4	6.81%	13,122	0.74	13,254	0.73	13,164	0.74	13,100	0.74
Hobbayne	34.99	219.9	15.91%	13,565	2.58	13,675	2.56	13,555	2.58	13,542	2.58
Elthorne	32.04	199.6	16.05%	13,678	2.34	14,305	2.24	14,687	2.18	14,653	2.19
Walpole	26.18	146.2	17.91%	13,407	1.95	13,597	1.93	13,559	1.93	13,727	1.91
Northfield	9.59	153.7	6.24%	13,096	0.73	13,201	0.73	13,081	0.73	13,026	0.74
Cleveland	35.06	223.1	15.71%	14,815	2.37	15,120	2.32	15,171	2.31	15,101	2.32
Hanger Hill	21.91	326.3	6.71%	14,658	1.49	14,741	1.49	14,589	1.50	14,514	1.51
Ealing Broadway	2.05	185	1.11%	14,154	0.14	15,756	0.13	17,077	0.12	17,836	0.11
Ealing Common	19.32	213.7	9.04%	13,463	1.44	13,545	1.43	13,407	1.44	13,391	1.44

Ward	POS (ha)	Area (ha)	POS by ward area	Population 2011	POS per 1000 people	Population 2016	POS per 1000 people	Population 2021	POS per 1000 people	Population 2026	POS per 1000 people
Perivale	35.74	335.9	10.64%	14,251	2.51	14,364	2.49	14,231	2.51	14,178	2.52
North Greenford	89.13	324.5	27.47%	13,529	6.59	13,670	6.52	13,566	6.57	13,522	6.59
Greenford Green	23.51	337.2	6.97%	12,970	1.81	13,082	1.80	12,969	1.81	12,929	1.82
Greenford Broadway	47.53	250.6	18.97%	15,474	3.07	15,639	3.04	15,550	3.06	15,994	2.97
Notholt Mandeville	56.98	275.1	20.71%	13,437	4.24	13,601	4.19	13,532	4.21	13,476	4.23
Northolt West End	53.32	353.6	15.08%	13,907	3.83	14,007	3.81	13,876	3.84	13,818	3.86
Totals	623.6	5536.8		322,384	45	333,821	44	339,428	44	348,899	44
Borough Average					1.95		1.92		1.92		1.90

In addition to enhancing access to public open space, the Council's planning policies also seek to address deficiency in access to nature. In this regard the Mayor/and now GiGL (Greenspace Information for Greater London) identify areas of deficiency in access to nature for all boroughs in London including Ealing. These are defined as localities that are more than one kilometre walking distance from a publicly accessible Site of Borough or Metropolitan Importance for Nature Conservation. Sites with restricted access have been excluded from this exercise. Based on the adopted SINC boundaries, the extent of the borough considered to be currently deficient in access is 1,120ha (spherical) which equates to 20.24% of the total area of the borough. This represents an important baseline to measure from in future years. Within Ealing a key tool to redress this deficiency has been to identify further sites of Local Importance. Locally graded sites may be identified and defined on the basis that these are considered to be the best sites to alleviate geographic deficiency, and because they have the greatest potential for enhancement. The policy can assist in securing the enhancement of locally important sites, which could be regraded at a later date to borough importance or higher, and thus address deficiency in the longer term.

Figure 6.1 – SINC network as adopted in 2013



As noted above the Council are currently undertaking a review of its Sites of Importance for Nature Conservation (SINC's), which will inform the new Local Plan. It is probable that this review will result in some further changes to the list of sites designated as SINC's and their grading, which may assist in alleviating deficiency and reduce the extent of the borough which is currently recorded as being deficient. Developing the evidence base and creating a policy framework to secure enhancements to the existing SINC network will be a key feature in the new Local Plan. As well as redefining the

network of sites, the SINC review is seeking to identify opportunities for enhancement and establish baseline unit scores for all sites to inform the application of Biodiversity Net Gain.

These tables/figures above therefore provide an important baseline from which it is possible to monitor change overtime, and to verify whether policies are effective in redressing deficiency. In future years it will be possible to monitor whether access to open space and nature has improved.

Development Indicators

Local development policies primarily seek to protect open space from inappropriate development. Accordingly, only built development which directly supports (or is ancillary) and does not compromise the function/character of that open space is permitted. An analysis of permissions and completions involving built development on open space is useful in revealing how effective the policies have been in safeguarding open space.

Commentary on each of the 5 years covered by this monitor are outlined below. As with the other non-residential chapters of this report, these figures omit OPDC records from 2015/16 onwards. In any event no developments were recorded within open space in the OPDC's area during this period.

2014 - 2015

In terms of built development four proposals have been completed in the year which resulted in losses or gains in open space. One of these applications resulted in gains totalling 0.143 ha, whilst the remaining three resulted in losses totalling 0.253 ha. Overall these developments gave rise to a net loss of 0.11 ha of open space. It should be noted that these changes have been recorded for designated & non-designated open space only.

With regard to permissions, 27 applications have been approved which resulted in either a gain or loss of open space. Eleven of these applications resulted in overall losses totalling 0.308 ha, whilst the other 16 resulted in a gain of 4.753 ha. Unlike completions these developments would result in a net gain of 4.445 ha of open space, which is quite significant. Much of this gain was secured through a small number of strategic development schemes including the redevelopment of the former GSK site and Acton Gardens.

With regard to sites of importance for nature conservation (SINC), policies 5.4 and 2.18 of the Development Strategy and Development Management DPDs respectively resist new built development on such sites. No schemes were completed during the year which involved development on such land, although one scheme was permitted. This scheme involved the installation of a tarmacadam sports pitch measuring 153 sq. m, with boundary fence on the north east corner of Smith Farm Estate on land currently designated as a SINC and Green Belt. The new sports pitch was located on the existing car park area and thus didn't increase the extent of hardstanding, and therefore the impact of ecology was considered to be minimal.

2015 – 2016

In terms of built development nine proposals have been completed during 2015-2016 which resulted in losses or gains in open space. Five of these applications resulted in gains totalling 0.360ha, whilst the remaining four resulted in losses totalling 0.167 ha. Overall these developments gave rise to a net gain of 0.193 ha of open space. It should be noted that these changes have been recorded for designated & non-designated open space only.

With regard to permissions, 15 applications have been approved, which gave rise to either a gain or loss in open space. Ten of these applications resulted in overall losses totalling 1.324 ha, whilst the other five resulted in a gain of 2.013 ha. Unlike completions these developments resulted in a modest net gain of 0.689 ha of open space.

With regard to ecological designations no schemes were completed during the year which involved development on such land, although one scheme was permitted. This scheme involved the development of a single form entry primary school replacing an existing two storey dwelling house and ancillary accommodation at The Rectory on Tentelow Lane and land designated as a SINC and MOL. Various mitigation/compensation measures have been incorporated into the scheme. Specifically the building has been positioned to minimise its impact on the SINC to the east of the site, with the resulting building footprint only occupying approximately 30 sq. m. of the site. A condition is also attached requiring a Wildlife Protection Plan which is expected to provide full details of the ecological improvement works to be incorporated into the scheme.

2016 - 2017

In terms of built development thirteen proposals have been completed during 2016-2017 which resulted in losses or gains in open space. Five of these applications resulted in gains totalling 0.307 ha, whilst the remaining eight resulted in losses totalling 0.356 ha. Overall these developments gave rise to a very small net loss of 0.049 ha of open space. It should be noted that these changes have been recorded for designated & non-designated open space only.

With regard to permissions, 22 applications have been approved, which resulted in either a gain or loss of open space. 17 of these applications resulted in overall losses totalling 3.186 ha, whilst the other five resulted in a gain of 2.241 ha. Overall these permissions if implemented will result in a modest net loss of 0.945 ha of open space.

With regard to ecological designations one scheme was completed during the year which involved development on such land, and two schemes were permitted.

The completed scheme involved the construction of a temporary modular classroom building and associated hard surface area at the grounds of Brentside High School on land designated as a SINC and MOL. The building footprint and associated hardstanding covered an area of 565 sq. m. The proposal was considered acceptable on ecological grounds, on the basis that the ecological appraisal identified no significant features within this part of the site, ecological enhancements were proposed, and the proposal would only be in situ for a limited period of three years after which time the land would be reinstated and enhanced.

In terms of permissions, the first of these involved various improvement works to St Augustine's Priory School. Whilst the site is designated as a Grade II SINC, the proposed works do not affect the majority of the SINC. The proposal did however involve the loss of nine trees and two tree groups and a species rich hedgerow. The proposal did not impact on the pond. The identified loss of trees and hedgerow are mitigated through the re-provision of 37 new trees, and the relocation of the hedgerow. Further ecological enhancements are also to be incorporated by way of a condition.

The second permission pertains to the completed scheme mentioned above at Brentside High School.

2017 – 2018

In terms of built development ten proposals have been completed during 2017-2018, which resulted in losses or gains in open space. Four of these applications resulted in gains totalling 1.012 ha, whilst the remaining six resulted in losses totalling 0.135ha. Overall these developments gave rise to a small net gain of 0.877 ha of open space. It should be noted that these changes have been recorded for designated & non-designated open space only.

With regard to permissions, 11 applications have been approved, which resulted in either a gain or loss of open space. Seven of these applications resulted in overall losses totalling 1.766 ha, whilst the other four resulted in a gain of 1.330 ha. Overall these permissions if implemented will result in a modest net loss of 0.436 ha of open space.

With regard to ecological designations no schemes were completed during the year which involved development on such land, although two schemes were permitted.

In terms of permissions, the first of these involved the construction of 26 residential units at Toplocks on land designated as a SINC of Local Importance. The application was accompanied by an enhanced landscaping schedule and management strategy, which would ensure that the SINC characteristics remain and are enhanced rather than diminished.

The second permission involved the redevelopment of the Twyford Abbey site for a secondary school on land designated as a SINC and MOL. The proposal has sought to maintain the integrity of the SINC and ensure long term viability through appropriate management measures (conditioned through a Nature Conservation Management Plan).

2018 – 2019

In terms of built development nine proposals have been completed, in the year which resulted in losses or gains in open space. Two of these applications resulted in gains totalling 0.608 ha, whilst the remaining seven resulted in losses totalling 1.051 ha. Overall these developments gave rise to a net loss of 0.443 ha of open space. It should be noted that these changes have been recorded for designated & non-designated open space only.

With regard to permissions 5 applications have been approved, which if implemented would result in either a gain or loss of open space. Three of the applications resulted in net losses of 1.891 ha,

whilst the other two resulted in a net gain of 1.633 ha. Overall these developments if implemented would result in a modest loss of 0.258 ha.

With regard to ecological designations one schemes was completed during the year which involved development on such land, and one scheme was permitted.

The completed scheme (P/2008/0156 at Dickens Yard) involved the redevelopment of the site to accommodate circa 700 units and commercial space. At the time of the assessment whilst the site itself had limited nature conservation interest or potential, it did adjoin the railway Green Corridor to the north, although the development didn't directly encroach on to it. The scheme did however encroach onto a SINC site of Local Importance – Christ Church School Nature Area (EaL24), to the east of the application site. At the time of determination compensation was to be secured by way of a condition through the creation of replacement land following demolition of the parish hall. A subsequent application (PP/2011/5369) on the school itself has now essentially encroached across the full extent of the SINC.

In terms of permissions, the one scheme was noted (184337VAR - Toplocks) which constituted a variation (S.73) to an earlier application (161452FUL) which was reported as an approved loss in 2017/18. The variation is not considered to alter the impact on ecology.

Table 6.5 - change in open space by approvals

Year	Number of Schemes	Net Change
2014/15	27	4.445
2015/16	15	0.689
2016/17	22	-0.945
2017/18	11	-0.436
2018/19	5	-0.258

Table 6.6 – change in open space by completions

Year	Number of Schemes	Net Change
2014/15	4	-0.11
2015/16	9	0.193
2016/17	13	-0.049
2017/18	10	0.877
2018/19	9	-0.443

Whilst it is fairly straightforward to monitor change in this way, i.e. in terms of the direct loss of land to built development, it is much more difficult to monitor change in respect of quality, and in this instance, the biodiversity value of that space. It may however be possible to monitor change to the population of individual species or to the quality of the management of habitats. Priority Species and Habitats are listed in the Council's Biodiversity Action Plan. Change can be monitored as part of a review of the action plan. In this regard the Council is not aware of any significant changes at present, although the Council are in the process of reviewing and updating the Biodiversity Action Plan due to be published in Autumn 2021.

The Council are also currently undertaking a review of its Sites of Importance for Nature Conservation (SINC's), which will inform a future Local Plan review. It is probable that this review will result in some changes to the list of sites designated as SINC's and their grading. As part of this review and to assist the application of Biodiversity Net Gain as a policy instrument, the review will establish baseline biodiversity unit scores for all SINC sites. Establishing baseline scores in this way will also facilitate better monitoring in the future.

Policy Indicators

Appeal Decisions

A survey of appeal decisions (determined during the 5 reporting years) revealed that policies relating to open space both in the Core Strategy & Development Management DPD were frequently used. A review of appeals upheld has been undertaken to establish whether such decisions highlight any shortfall with local policies, or question their validity.

By and large such policies were applied with little incident. Only a couple of points are of note. The first, related to the use of policy 7D in the Development Management DPD which sets open space provision requirements for select development types. For one appeal case (PP/2014/4931) decided during 15/16 for the creation of a new two storey dwelling, the Inspector contends that it is not clear if the circumstances of the case trigger the need for amenity space, and also chooses only to apply the baseline standard set through the Mayor's Housing SPG only. It is not entirely clear if this is the result of a misunderstanding, or if the Inspector has placed greater weight on the Mayor's standard. This is particularly frustrating as DM policy 7D clearly states that the standards in the Mayor's Housing SPG are to be treated as a minimum baseline requirement, which in most circumstances will be expected to be supplemented by additional provision in line with the requirements detailed in policy 7D. Since the time that this appeal was determined it should be noted that the Council has now adopted an SPD which provides further guidance on the implementation of this policy ('Planning New Garden Space' – June 2015), and this should assist in minimising any further confusion around the application of the policy. For a second appeal (171212FUL) decided in 18/19, the Inspector similarly appeared to attach greater weight to the Mayor's minimum baseline standard, at the expense of upholding local requirements. Other than emphasising this point in the appeal statement, it is difficult to know what further emphasis could be added to the policy to avoid similar issues arising in relation to the treatment/application of this policy in future appeal schemes.

A scheme (165581FUL) decided in 17/18 involving the creation of a new dwelling on garden land to the rear of an existing residential property, highlighted the consideration of backland development. Whilst the Inspector noted that the Council had not established a specific policy resisting inappropriate development of residential gardens as suggested through the NPPF (2012 version at the time – paragraph 53) and the London Plan (2015 version – policy 3.5), the Inspector importantly noted that the NPPF did not intend that this would take the form of a blanket restriction on development in back gardens. Moreover it should be noted that such a provision has not been carried forward into the 2021 London Plan.

Departures

Applications which are not in line with the development plan are required to be formally advertised as departure applications in line with Article 13 of the Town & Country Planning (Development Management Procedure) Order 2010. In addition to those applications formally advertised as departures, there were a handful of other applications which were deemed to be departures which are not formally advertised. An analysis of such applications is useful in illustrating where particular pressure points exist in relation to the implementation of the development plan policies.

2014-2015

With regard to permissions granted during the year, 14 applications were formally advertised as departures. Most of these (10) were considered to depart from open space policies.

Table 6.7 – Departure applications conflicting with open space policies approved in 2014/15

Application Ref	Address	Proposal (Summary)	Departure Reason
PP/2014/0523	Dormers Wells Play Centre	Single storey rear extension	Inappropriate development on Green Belt
PP/2014/0394	William Perkins High School	Single Storey extension for temporary period	Inappropriate development on MOL
PP/2014/0684	Springhallow School	Erection of a 2 storey school building following demolition of existing buildings	Built development on Green Corridor and SINC
P/2014/1459	Durdans Park Primary School	Erection of a temporary single storey classroom building	Inappropriate development on Green Belt
P/2013/4113	Phase 3.2 Acton Gardens	Redevelopment of estate involving removal of youth centre and leisure facilities in South Park	
PP/2014/2720	West Twyford Primary School	Temporary siting of 2 single storey classroom buildings	Inappropriate development on MOL
PP/2014/2436	West Twyford Primary School	Erection of two storey two form entry primary school	Inappropriate development on MOL
PP/2012/2129	18 Grove Avenue and Garage Block to the rear	Construction of 3 dwellinghouses	Inappropriate development on MOL
P/2014/4486	Havelock Road Open Space	Siting of two temporary marketing suites	Built development (temporary) on Public Open Space and Blue Ribbon Network
PP/2014/3775	The Study Centre, Compton Close	Erection of a two storey extension, replacing existing buildings.	Built development on Green Corridor and SINC

A number of these schemes involved the erection of temporary buildings, and the land would be reinstated back to its former state, after a defined period of time, and therefore an exception was allowed as the impact was considered to be reversible. In other cases the development involved the replacement of existing buildings, and the proposal did not represent a considerable uplift or change from that existing already on the site. In one case (Grove Avenue) an exception was allowed as regard was had to the new Local Plan, which removed the MOL designation from the site, as it no longer satisfied the tests for this designation. Although correctly advertised as a departure at the

point of receipt of the application, the MOL designation was subsequently removed by the point that a decision on the application was made.

2015-2016

With regard to permissions granted during the year, 11 applications (excluding those falling within the OPDC's area) were formally advertised as departures. Of these 10 were considered to depart from open space policies.

Table 6.8 – Departure applications conflicting with open space policies approved in 2015/16

Application Ref	Address	Proposal (Summary)	Departure Reason
PP/2013/3241	Phases 1-4 Havelock Estate	Outline application for development of estate	Built development on POS following reconfiguration of estate
PP/2015/1288	Drayton Green	Erection of temporary single storey modular building for use as nursery and adult learning centre	Built development on POS
PP/2015/1470	Elthorne Park High School	Erection of 2 storey temporary modular building comprising classroom accommodation.	Inappropriate development on MOL
PP/2015/2182	Brentside High School	Construction of teaching block, MUGAs and other associated works.	Inappropriate development on MOL (note only a small part of the application site encroaches into MOL area.
PP/2014/5207	William Perkins High School	Construction of community sports pavilion, changing facilities, sports pitch and associated works	Potentially inappropriate development (in part) on MOL and COS.
PP/2015/1709	Garages to rear of 18 Grove Avenue	Construction of 4 semi-detached dwellings	Incorrectly advertised as a departure. Note the MOL designation was removed from the site in December 2013.
PP/2015/4977	Former Depot Site – Acton Park	Construction of a 2 form entry primary school	Inappropriate development on MOL and POS. Note intention to remove these designations published in draft School DPD.
PP/2015/5504	Dormers Wells Junior School	Construction of 2 storey school extension	Inappropriate development on MOL
PP/2015/2659	The Rectory, Tentelow Lane	Construction of a 2 storey primary school building	Inappropriate development in MOL and SINC
PP/2015/6885	Ken Acock Centre	Two storey side extension and expansion of community centre	Built development on POS

As in previous years a number of these schemes (PP/2015/1288 & PP/2015/1470) involved the erection of temporary buildings, and the land would be reinstated back to its former state, after a defined period of time, and therefore an exception was allowed as the impact was considered to be reversible. In other cases the development involved the replacement of existing buildings, and the proposal did not represent a considerable uplift or change from that existing already on the site. In

one case (PP/2015/4977 – Acton Depot) an exception was allowed as regard was had to an emerging Local Plan document (Planning for Schools DPD) at the time, which was proposing to release part of the site from MOL and POS. This change was subsequently adopted in May 2016. One application (PP/2015/1709 – Grove Avenue) was incorrectly advertised as a departure as the MOL designation had been previously removed from the site in December 2013.

2016-2017

With regard to permissions granted given during the year, 15 applications were formally advertised as departures. Of these the majority (12) were considered to depart from open space policies.

Table 6.9 – Departure applications conflicting with open space policies approved in 2016/17

Application Ref	Address	Proposal (Summary)	Departure Reason
160659FUL	Havelock Road Open Space	Erection of a two storey marketing suite	Built development on POS
P/2015/2387	Warren Farm Sports Centre	Redevelopment of site to provide sporting facilities for professional and community use	Inappropriate development (in part) on MOL and COS
161730FUL	St Augustine's Priory School	Extension to existing school block, widening vehicle access, formalisation of car park and various other improvements	Inappropriate development on MOL
161731FULR3	Eversheds Sports Ground	Change of use of sports pavilion to a temporary school use	Inappropriate development on MOL & COS
160365FUL	Brentside High School	Construction of new school building and associated hardstanding	Inappropriate development on MOL and SINC
1610603FULR3	Dormers Wells Infant School	Two single storey extensions to school building and associated works	Inappropriate development on MOL and COS
PP/2015/6021	Rectory Park	Provision of sporting facilities comprising changing facilities, training space, office accommodation and 2 full size 3G football pitches.	Inappropriate development on GB
161902FULR3	Mayfield Primary School	Redevelopment of site to provide a new school and associated facilities	Inappropriate development on MOL
PP/2015/3558	Phase 7.1 South Acton Estate	Redevelopment of estate involving reconfiguration and part re-development of Avenue Road POS	Built development on POS
165957VAR	St Augustine's Priory School	Variation of condition for earlier approval	Built development on POS
165574FUL	Petrol Filling Station, 301 Uxbridge Road, Southall	Construction of single storey building for vehicle repairs and MOT and associated car parking	Built development in MOL
170531FUL	Land to the west of Old Oak Road	Construction of a temporary sales and marketing building	Built development in MOL

As in previous years a number of these schemes (160659FUL – Havelock, 161731FULR3 – Eversheds, and 170531FUL – Old Oak) involved the erection of temporary buildings or works, and the land would be reinstated back to its former state, after a defined period of time (typically 3 to 5 years), and therefore an exception was allowed as the impact was considered to be reversible.

In other cases the development was modest in nature and was considered to have minimal impact on openness (161603FULR3 – Dormers Wells, 165574FUL – Petrol Filling Station). Two of the schemes (P/2015/2387 and PP/2015/6021) whilst incorporating inappropriate elements were considered overall to enhance their status as MOL and GB respectively, through improving the recreation offer of the space. One of the schemes (161902FULR3 – Mayfield Primary School) involved the redevelopment of the site to provide a replacement school. Whilst higher than the original school building, the footprint was smaller. An exception was supported because there was an overriding need to replace the school, a lack of alternative sites and because the proposal was not considered to alter the open character of the area.

2017-2018

With regard to permissions granted during the year, 5 applications (excluding the OPDC's demise) were formally advertised as departures. Of these 4 were considered to depart from open space policies.

Table 6.10 – Departure applications conflicting with open space policies approved in 2017/18

Application Ref	Address	Proposal (Summary)	Departure Reason
171665FUL	Cardinal Wiseman School	Replacement of existing school pitch	Development on SINC (POS & MOL)
161452FUL	Land at Toplocks	Construction of 26 residential units and associated works	Built development on SINC (LSIS)
172224FUR3	Mayfield Primary School	Erection of temporary modular classroom associated with wider redevelopment works to replace the school	Inappropriate development on MOL
173806FUR3	Durdans Park Primary School	Construction of single storey extension to nursery, installation of canopy and associated hardstanding	Inappropriate development in GB

A proposal at Cardinal Wiseman school involving the installation of a synthetic sports pitch was considered appropriate development in respect of MOL policy, however it still had potential to conflict with the ecological status of the site, and accordingly was advertised as a departure. An exception was allowed as the site was considered to have no obvious ecological value.

A proposal involving the construction of 26 residential units on a Site of Importance for Nature Conservation was permitted because the scheme was considered to deliver substantial gains in habitats across the site. The scheme incorporated a comprehensive package of landscaping and ecological measures, including the creation if an Eco Park and wildlife refuge. Off-site improvements

at Glade Lane were also incorporated. In addition, the scheme improves access to nature through the inclusion of a new bridge over the canal.

The proposal at Mayfield Primary School involved the erection of a modular classroom building for a temporary building to cover the duration of the main school build. An exception was supported because of its temporary nature.

The proposed works at Durdans Park Primary school were permitted because the works were modest in size and well screened, and therefore the works were not considered to have a greater impact on openness.

2018-2019

With regard to permissions granted during the year, 7 applications (excluding the OPDC's area) were formally advertised as departures. Of these all 6 were considered to depart from open space policies.

Table 6.11 – Departure applications conflicting with open space policies approved in 2018/19

Application Ref	Address	Proposal (Summary)	Departure Reason
178965FUL	Ealing Field's School, Evershed Sports Ground, Wyke Gardens, Hanwell	The use of the site and sports pavilion as an educational facility until 31st August 2020.	Development on MOL and COS
180322FUL	Ealing Primary Centre 573 Greenford Road Greenford Middlesex	Construction of two-storey side extension and installation of single-storey steel storage shed.	Development on SINC and Green Corridor
161600VAR	Brentside High School Greenford Avenue Hanwell	Note variation application involving alterations to include removal of external dining area and increase in ground floor footprint; use of energy efficient gas boilers in lieu of CHP, associated with Construction of teaching block, MUGAs and other associated works (PP/2015/2182).	Development encroaching on MOL, reduced by 65m2
174502VAR	Dormers Wells Infant School, Dormers Wells Lane, Southall	Note variation application amending condition relating to an earlier application for an extension and ancillary works to school. Note this amendment relates to the removal of trees.	Site designated as MOL and COS
183385FUL	Fielding Primary School, Wyndham Road, West Ealing	Installation of onsite hardstanding footpath	Adjacent to Fielding Walk, a public park designated as POS
185623FUL	William Perkin C of E High School, Oldfield Lane North, Greenford	Single-storey rear (dining hall) extension and associated hardstanding	Development on MOL and COS

The proposal (178965FUL) at Eversheds Sports Ground, involved a time extension of an earlier temporary permission (161731FULR3) for the use of the sports pavilion as school accommodation awaiting the development of a new school on Little Ealing Lane. The original scheme permitted the use for the period from June 2016 until June 2018. Given delays in funding/progressing the main school development on Little Ealing Lane, an extension was sought allowing the continued use of buildings at Eversheds until 31st August 2020. The main school opened in September 2020. As before an exception was supported because of the finite nature of the proposal, and the overriding need to facilitate the development of a new secondary school.

An extension was permitted at Ealing primary Centre, as well as associated landscaping works, which in part is located within a SINC of Local Importance. The built extension whilst located on grassland sits outside of the extent of the SINC area. The creation of a new soft play area utilising an artificial surface is partially located within the SINC area but was considered to have a negligible to minimal impact on biodiversity due to the low biodiversity value of that part of the site and small extent of the artificial surface and moreover it was not considered to unduly impact upon the openness of the open space. During the construction work it was also necessary to temporarily re-locate and re-provide 16 car parking spaces on the grassed area (SINC local importance and Green Corridor) to the south of the site. The temporary carpark had a mat grid surface and was returned to its original grassed condition once construction works were completed.

Two of the schemes (161600VAR and 174502VAR) entailed variations on full permissions given and reported in previous years, 2015/16 and 2016/17 respectively. Neither scheme was considered to alter the situation reported previously.

A fifth application 183385FUL related to the creation of a new pedestrian path at Fielding School linking the existing hardstanding playground to a new entrance gate at the southern boundary with Fielding Walk designated as Public Open Space. The works were considered to have no or negligible impact on the POS.

A single storey extension was permitted at William Perkin's C of E High School, accommodating an extended dining hall. Whilst located on MOL, the extension was sited so as not to interfere with the functional use of the wider open space, and was modest in size, and therefore minimising the impact on openness. The extension was considered to be essential, and therefore when balanced against the minimal impacts, allowing an exception was deemed to be acceptable.

7. Climate Change and Sustainable Infrastructure

Introduction

Whilst this section of the monitor is wide ranging in terms of the policy areas examined, the indicators analysed all have a common thread in that they demonstrate how effective planning policies have been in mitigating climate change as well as minimising exposure to the consequences of environmental change with adaptation measures. As with other sections, permissions and completions data has been analysed to understand change. Data in particular has been collected for waste and mineral developments, as these provide a measure of progress against the apportionment targets identified in the West London Waste Plan and the London Plan. The effectiveness of policies in managing flood risk is also monitored. Both the London Plan and the Local Plan (specifically the Development Management DPD) set targets for the achievement of carbon emission savings and sustainable design and construction delivered through new development. An analysis of achievement against these policies is provided.

Flood Risk

Climate change is clearly contributing to the frequency and severity of flooding events, whilst the pressure to accommodate development is also potentially increasing the exposure and risk arising from flooding events. The planning system has a key role to play in mitigating and managing these risks.

National policy tasks Local Planning Authorities with preparing a Strategic Flood Risk Assessment (SFRA), which assesses the risk of flooding from all sources, now and in the future, taking account of the impacts of climate change. The SFRA is a planning tool with supports and informs the preparation of the Local Plan and the determination of planning applications, and seeks to steer new development away from areas of greatest risk of flooding.

In May 2018, the Council, jointly with neighbouring authorities in West London, published a new (Level 1) SFRA which supersedes the earlier report issued in March 2008. The new SFRA can be viewed here: http://westlondonsfra.london/

The 2018 SFRA is unique relative to SFRAs prepared elsewhere and the one published in 2008. What sets it apart is its consideration of surface water flooding, which is recognised is a particular issue for London boroughs like Ealing. Environment Agency flood zones are based only on fluvial and tidal sources, however the 2018 SFRA also defines new zones based on surface water risk. By doing this, these newly defined surface based flood zones are subject to the same policy requirements as the fluvial and tidal zones. Through extending formal zoning to also cover areas of surface water risk, the spatial extent of the zoned areas has increased significantly. Previously the main zoned areas at risk were concentrated around the River Brent corridor and its tributaries. Reflecting the new approach the extent of zoned areas and the geography of risk is no longer just limited to the river corridor, but instead is now much more dispersed throughput the borough.

As with previous AMRs a particularly useful indicator to monitor in respect of this policy area, is the advice given to the LPA by the Environment Agency on planning applications, and particularly where exceptions may have been permitted at odds with this advice. Commentary is therefore provided on

applications granted which are contrary to the advice of the Environment Agency on flooding and water quality grounds, relying on data collated by the Environment Agency itself. Whilst information was unfortunately unavailable for 14/15, it is available for the other 4 years, and accordingly commentary is provided below for these years.

2015 to 2016

During the period 1st April 2015 to 31st March 2016 the Environment Agency lodged objections to 2 applications in the borough on flood risk grounds.

The first of these (PP/2015/0537) involved a 12 unit residential scheme in flood zone 3a. The Environment Agency objected to this scheme on the basis that no sequential test was undertaken. This application was however later withdrawn.

The Environment Agency objected to a second scheme (PP/2015/1178) involving the construction of a 1,292 sq. m. extension to a warehouse building, on the basis that the scheme didn't make appropriate provisions for managing drainage, although noted that compliance with this would need to be confirmed by the Lead Local Flood Authority (LBE). In response the applicant prepared a revised drainage strategy for the scheme, and have agreed to incorporate a rain garden into the scheme, which is secured through appropriate conditions. The LLFA has confirmed that it is happy with the proposed response, and accordingly the Environment Agency's initial objections have been overcome.

During the period the Environment Agency raised no objections on water quality grounds.

2016 to 2017

During the period 1st April 2016 to 31st March 2017 the Environment Agency lodged objection to only 1 application in the borough on flood risk grounds.

This application (160365FUL) involved the provision of new school buildings (modular) for temporary use at Brentside High School. The Environment Agency raised initial objection to the scheme on the basis that that Flood Risk Assessment was considered to be unsatisfactory, although this was subsequently revised to their satisfaction.

During the period the Environment Agency raised no objections on water quality grounds.

2017 to 2018

During the period 1st April 2017 to 31st March 2018 the Environment Agency raised no objections in respect of flood risk or water quality grounds.

2018 to 2019

During the period 1st April 2018 to 31st March 2020 the Environment Agency lodged objection to only 1 application in the borough on flood risk grounds.

This application (190122HH) involved excavation to provide a basement. The application site lies within Flood Zone 3 having a high probability of flooding. The Environment Agency raised an

objection as a flood risk assessment (FRA) had not been submitted with the application. This applicant subsequently made a decision not to proceed with the application, and therefore it was not determined.

During the period the Environment Agency raised no objections on water quality grounds.

Waste and Mineral Developments

On-going monitoring of developments expanding, amending, or removing waste capacity in the borough will be key in understanding progress towards achieving the capacity targets identified in the London Plan.

During the period covered by this monitor, the Council alongside the neighbouring authorities of Brent, Harrow, Hillingdon, Hounslow, Richmond and the OPDC, published a joint waste development plan (July 2015).

In considering the completions and permissions data for this sub section, change in floorspace for waste and mineral facilities have been monitored for each year. An analysis of all B2, B8 & Sui Generis completions/permissions have been undertaken to identify where such changes have occurred. Unlike for the other non-residential chapters the data reported here is done at a borough scale, rather than an LPA one, because uniquely unlike other targets in the new 2021 London Plan, the waste apportionment targets are presented for Ealing Borough incorporating the OPDC's capacity requirements.

2014/15

No changes were recorded in respect of completions during the year. In terms of permissions one application (PP/2013/4112) was approved at land at South Business Centre, Johnson Street, Southall, involving the alterations to an existing skip hire business to allow for the sorting, segregation and storage of 5,000 tonnes of waste per annum, associated with the existing skip hire business. It is not entirely clear whether the original facility constituted waste management or transfer, and whether the proposed activities now constitute (additional) management capacity and contributes towards meeting the boroughs apportionment target. This will need to be investigated further as part of the monitoring process of the West London Waste Plan.

2015/16

No changes were recorded in respect of completions during the year. With regard to permissions one application (PP/2015/3534) was approved for the construction of a 536 sq. m. building to accommodate a paper processing, shredding and bailing plant on land to the west of Western Road, Park Royal. The plant is expected to process in the order of 15,000 tonnes of waste per annum. This represents a new facility, although is associated with the operator's main waste depot facility on Minerva Road. This capacity represents new capacity and can count against the London Plan apportionment targets if implemented.

2016/17

In respect of waste developments, one application (PP/2013/4112) was completed during the year at South Business Centre involving the alterations of an existing skip hire business to allow for the sorting, segregation and storage of 5,000 tonnes of waste per annum. Further detail on this scheme is covered above with reference to the planning permission under 2014/15. No changes were recorded in respect of permissions during the year.

2017/18

No changes were recorded during the year in respect of permissions and completions.

2018/19

With regard to waste related developments, one permission (179037FUL) was recorded at an existing waste management facility on Station Approach in Greenford. Whilst this proposal involved a part change of use and extension, it doesn't on the face of it appear to have increased throughput capacity. No changes were recorded in respect of completions during the year.

Table 7.1 below summarises the status of the 11 sites identified in the West London Waste Plan, which are located within Ealing.

Table 7.1 – Status update of WLWP Ealing sites

Site Name	Ref	Status	description	Change arising from planning activity
Greenford Reuse and Recycling Centre and Depot	309/310	Existing	Allocated (safeguarded) Waste Site	None
Quattro, Victoria Road	328	Existing but note HS2 safeguarding	Allocated (safeguarded) Waste Site	None
Acton Waste and Recycling Centre		Existing	Existing Safeguarded Waste Site	None
O C S Group UK Ltd/Citron Hygiene, Unit 2 and Yard Sovereign Park		Existing, but redundant	Existing Safeguarded Waste Site	None during reporting period, but note pending application (201704OPDFUL)
Yeoman Aggregates, Stone Terminal	355	Existing	Existing Safeguarded Waste Site	None
Bridgemart Ltd, Horn Lane Waste Transfer Station	369	Existing	Existing Safeguarded Waste Site	None
Environmental Tyre Disposals Ltd/RRS Recycling Solution, Chase Road	305	Existing	Existing Safeguarded Waste Site	None
London Auto Parts Ltd, Alperton Lane	322	Existing	Existing Safeguarded Waste Site	None
Iver Recycling Ltd, British Rail Goods Yard, Greenford	320	Existing	Existing Safeguarded Waste Site	Permission (179037FUL) secured (August 2018) for expanded facility but unclear if throughput capacity has increased
D B Schencker Rail (UK) Ltd		Existing but note HS2 safeguarding	Existing Safeguarded Waste Site	None
Bridgemart Ltd, Atlas Wharf	336	Existing	Existing Safeguarded Waste Site	None

The West London Waste Plan identifies a number of additional monitoring indicators which will be monitored separately.

Over the 5 years monitored no changes were reported in relation to existing or proposed mineral/aggregate operations.

Energy and Sustainability

In previous monitors we have reported on the aggregated performance of developments permitted or completed during the relevant monitoring period in respect of their contribution towards the mitigation of and adaptation to climate change. Specifically past monitoring reports have analysed the carbon savings achieved from each stage of the Mayor's Energy Hierarchy relative to the policy

targets in place at the time. Moreover, these reports have also measured the aggregated performance of developments against policy requirements relating to BREEAM and Code.

As will be evident however below, the policy context and requirements have remained in a state of flux, with the policy requirements continuing to evolve over this period. Given the changing baseline position, it is difficult to provide meaningful temporal analysis over a longer timeframe. It is important to note too, that applications completed during this monitoring period (2014-19) may have been permitted during an earlier period and may therefore have been subject to different policy requirements. In recognition of this, this monitor instead will focus more on providing a qualitative analysis of performance over the period, and will start by providing commentary on how the policy context has changed over this period, before providing some high level commentary on the performance of schemes overall.

Policy Context

The key policies relating to this area of planning covering the period of reporting were contained in chapter 5 of the London Plan (2016), and specifically policy 5.2 'Minimising Carbon Dioxide Emissions'. This policy is also supplemented by Local policy 5.2 of Development Management DPD (2013). The 2008 Planning and Energy Act allows Local Planning Authorities to set reasonable requirements in their development plan documents for a) the proportion of energy used in a development to be sourced from local renewable sources and/or local low carbon sources, and b) for energy efficiency standards which go beyond national Building Regulations requirements. For Ealing, energy planning requirements are fully aligned with the London Plan.

London Plan policy 5.2 established escalating targets which progressively step up over the plan period. During the last reported monitoring period (13/14), the carbon saving targets measured against the 2010 building regulations increased from the 1st October 2013 to 40%, from 25% required previously. Ealing embraced these changes, and therefore required all applications received on or after the 1st October 13, to demonstrate compliance with this improved percentage reduction.

The above targets were expressed as a percentage improvement against the then contemporaneous building regulations (2010). Towards the end of 2013, new part L building regulations were submitted which superseded the 2010 regulations. These regulations came into effect on the 6th April 2014. As these represented an improvement on the 2010 regulations, the baseline on which savings were measured as expressed through London Plan policy 5.2 changed. To assist with interpreting the policy targets against the new building regulations, the targets in 5.2 were translated into new percentage measures, as detailed in the Mayor's Sustainable Design and Construction SPG which was revised in April 2014. Therefore from 6th April 14, the Mayor sought a 35% carbon reduction beyond Part L 2013, which is broadly equivalent to the 40% target against Part L 2010 as expressed through the policy. The newly defined 35% saving target applied to all major residential and non-residential developments.

As noted above policy 5.2 of the London Plan contained stepped targets for residential and non-residential developments, with the targets previously stepping up in October 2013. From 1st October 2016, the saving target for major residential developments stepped up further to 'zero

carbon'. This target was intended to align with the then expected introduction of 'zero carbon homes' through Part L of the Building Regulations. However, the Government announced (July 2015) that it did not intend to proceed with the zero-carbon allowable solutions carbon offsetting scheme, or the proposed 2016 increase in on-site energy efficiency standards, and would keep energy efficiency standards under review. Zero carbon requires schemes to achieve a 100% improvement beyond 2013 building regulations for regulated energy only. At the time for non-residential developments the target remained unchanged (35% against 2013 Building Regulations). Mixed use schemes would also have to demonstrate compliance with the zero carbon target for the residential component and 35% target for the non-residential component.

In December 2017 the Mayor published a draft new London Plan. This proposed to extend the zero-carbon target already in place for major residential developments, to major non-residential developments as well. This draft plan and associated policy has now been 'adopted' in March 2021.

Whilst on paper these targets appear to be stretching (requiring both major residential and now non-residential developments to be zero carbon), in practice they fall somewhat short of this ambition.

In particular, whilst a zero-carbon target requires schemes to achieve a 100% improvement beyond the 2013 building regulations, the GLA's energy guidance only requires developments to achieve a minimum 35% reduction in on-site regulated carbon emissions, and permits the remaining percentage (to close the gap up to 100%) to be met off-site, including through an offsetting S106 contribution. The application of carbon offsetting has been operational for some years now, and even before the establishment of the zero carbon targets from 2016. The GLA's 2014 Sustainable Design and Construction SPG advised that boroughs develop their own local price, but in the interim it was recommended that a price of £60/tonne was used, which the LPA had previously been using. A revised price of £95/tonne was published in the Mayor's Energy Assessment Guidance, and is also referenced through the new London Plan (2021). Both the London Plan and guidance recommend that boroughs use the GLA's carbon offset price of £95 per tonne of carbon dioxide, or set their own through a Supplementary Planning Document based on local viability evidence. The current price of £95/tonne is based on the nationally recognised non-traded price of carbon from the Treasury Green Book, and this is the price which the LPA is currently applying when assessing new planning applications.

Experience of applying the policy shows that the original carbon price of £60 is far too cheap, and as a consequent has not incentivised applicants to exceed the 35% on-site improvement, as it is significantly cheaper to pay the offsetting contribution than it is to incorporate the equivalent percentage savings on-site. Developers are often choosing to pay to offset rather than providing climate resilient homes and buildings in Ealing. This approach to development locks in a standard of construction that will likely require buildings to be retrofit within the decade to adapt to climate change and negatively impacts the council's influence in meeting its 2030 carbon neutral commitment.

Moreover calculating the offsetting payment utilising the GLA's revised price of £95 also falls significantly short of covering the costs of implementing equivalent compensatory measures offsite, i.e. it costs significantly more than £95 to save a tonne of carbon.

Recognising these issues, Ealing alongside Barking & Dagenham, Greenwich, Haringey and Westminster commissioned a study to examine the role of carbon pricing to incentivise greater savings on site. The recommendations of this study including a new local carbon price will be progressed through the new Local Plan.

Carbon Performance of Schemes

Since its introduction in January 2013, and throughout this monitoring period, the Council has continued to promote its automated renewable energy and CO2 monitoring system (AEMP), which is a tool designed to confirm the actual output of renewable and low carbon installations in the borough, and in doing so confirm compliance with planning policy (in part at least). As detailed already above the London Plan sets carbon emission standards in relation to the new developments. In demonstrating compliance with these targets, developers/applicants are required to submit a detailed Energy Strategy. In preparing these statements, most applicants employ accredited modelling software tools to demonstrate compliance with the carbon savings targets set through planning policy. However, many of these software tools have limitations, primarily that compliance is demonstrated using 'relative/notional estimates', rather than being based on 'actual' energy generation or savings. There will often be a disparity between the estimated and actual output, and therefore relying on the submitted energy strategy means it is impossible to verify with certainty true compliance with policy.

Deploying post construction energy monitoring allows us to confirm 'true' compliance with the 'be clean' and 'be green' components of the energy hierarchy. The Council have appointed Energence Ltd to manage this platform on its behalf. Applicants have the option to either choose Energence or install their own monitoring equipment. During this monitoring period many applicants have signed up to the Council's automated platform (this number has increased over the years), with only a handful choosing to install their own monitoring equipment, and then separately reporting data back to the Council. To help bridge the performance gap between design theory and actual energy use/output, the GLA have also introduced a new 'be seen' requirement into the new 2021 London Plan. This process is broadly similar to that being deployed in Ealing since 2013 through the AEMP platform, but it will hopefully improve and increase the availability of monitoring data.

Table 7.2 below captures key statistics from the AEMP system since its introduction. The schemes listed here are organised by the date when monitoring first commenced, as indicated in the second column. Monitoring is carried out for a period of three years, and where available the figures given are based on the final year of monitoring, to allow time to resolve any early technical issues. For latter schemes where monitoring has commenced more recently, this monitoring activity may still be ongoing, and so the results here represent the latest available data but are preliminary and may not represent the final figures. The fourth column 'LZC CO2 cut target' reflects the estimated savings anticipated to be delivered from the LZC (Low Zero Carbon) measures as detailed in the applicant's energy strategy at the design stage, and the actual performance is measured against this figure. As noted above the percentages here are based on the anticipated performance of the 'be clean' and 'be green' components of the energy solution, and therefore don't represent the complete picture. At present there is no reliable method of monitoring the 'Be Lean' component. The fifth column 'CO2 cut achieved' is a direct output of the monitoring undertaken converting the energy output of

the LZC measures into a carbon saving which is presented as a percentage, which can be compared against the estimated saving target in column four. The difference between the actual output/saving and the estimated figure is set out in column 6 as a percentage variance. Where output and therefore savings has met or exceeded that originally anticipated this is represented with a positive figure (highlighted in green), and where measures have not performed as well as predicted these are highlighted in orange.

Table 7.2 – AEMP headline outputs

Number of Developments	Monitoring active date	Application Ref.	LZC CO_2 cut target	CO_2 cut achieved	CO_2 cut variance	CO2 cut to date (t)
1	01/11/2014	LBE/PP/2013/1800	44.48%	45.69%	1.21%	115.8
1	***2014-15***	***Totals & Averages***	***44.48%***	***45.69%***	***1.21%***	***115.8***
1	16/04/2015	PP/2013/4443	18.24%	37.21%	18.97%	33.9
1	02/09/2015	PP/2014/2464	13.50%	28.02%	14.52%	19.5
1	15/09/2015	PP/2014/0684	38.24%	39.45%	1.21%	140.1
1	21/11/2015	PP/2013/2127	11.80%	15.38%	3.58%	9.0
1	29/01/2016	PP/2013/2200	14.51%	12.45%	-2.06%	12.5
1	24/02/2016	PP/2014/2436	10.01%	16.33%	6.32%	10.7
6	**2015-16**	**Totals & Averages**	**17.72%**	**24.81%**	**7.09%**	**225.7**
1	11/05/2016	PP/2013/4843	26.09%	23.34%	-2.75%	22.6
1	09/09/2016	P/2014/4353	29.98%	21.98%	-8.00%	16.2
1	01/12/2016	PP/2014/4282	21.70%	22.25%	0.55%	9.1
1	06/12/2016	PP/2015/4264	34.59%	44.47%	9.88%	16.9
1	13/01/2017	PP/2013/3242				137.1
5	**2016-17**	**Totals & Averages**	**28.09%**	**28.01%**	**-0.08%**	**201.9**
1	26/04/2017	PP/2015/4020	25.91%	20.38%	-5.53%	29.6
1	02/05/2017	182821OPDC2	1.57%	1.96%	0.39%	250.2
1	10/08/2017	PP/2014/4595	31.16%	32.65%	1.49%	26.5
1	24/11/2017	163701FUR3				4.7
1	13/02/2018	PP/2015/2182	51.76%	53.74%	1.98%	25.2
5	**2017-18**	**Totals & Averages**	**27.60%**	**27.18%**	**-0.42%**	**336.2**
1	05/05/2018	177606REM	33.36%	15.06%	-18.30%	14.0
1	12/07/2018	PP/2015/2559	8.33%	11.07%	2.74%	5.0
1	18/07/2018	170009NMA	33.36%	43.79%	10.43%	10.1
1	22/11/2018	164030FUR3	13.90%	14.83%	0.93%	3.3
1	16/02/2019	PP/2013/2127	13.82%	12.91%	-0.91%	12.2

Number of Developments	Monitoring active date	Application Ref.	LZC CO_2 cut target	CO_2 cut achieved	CO_2 cut variance	CO2 cut to date (t)
1	16/02/2019	160612FUL	16.80%	1.24%	-15.56%	2.3
1	17/02/2019	PP/2013/2127	12.26%	8.66%	-3.60%	6.6
1	25/02/2019	PP/2015/3238	29.12%	42.56%	13.44%	41.2
1	08/03/2019	PP/2014/4494	29.63%	19.35%	-10.28%	14.2
1	30/03/2019	P/2014/6383	20.37%	3.97%	-16.40%	30.1
10	**2018-19**	**Totals & Averages**	**21.10%**	**17.34%**	**-3.75%**	**139.0**
1	16/04/2019	PP/2016/0288	24.67%	30.56%	5.89%	42.4
1	14/05/2019	P/2013/5324	3.74%	2.03%	-1.71%	5.8
1	24/05/2019	PP/2014/4385	36.54%	7.51%	-29.03%	2.3
1	04/07/2019	PP/2013/1188	27.73%	33.74%	6.01%	77.1
1	04/07/2019	177584FUL	35.33%	54.86%	19.53%	18.5
1	10/07/2019	164015FUL	4.28%	2.36%	-1.92%	56.9
1	15/07/2019	P/2013/1486	15.00%	20.79%	5.79%	7.7
1	17/07/2019	PP/2013/5390	28.73%	38.54%	9.81%	12.1
1	04/09/2019	PP/2014/4105	27.19%	12.46%	-14.73%	10.7
1	25/09/2019	PP/2015/3558	19.29%	1.94%	-17.35%	6.2
1	01/10/2019	161452FUL	33.71%	34.64%	0.93%	19.9
1	04/10/2019	161362FUL	28.17%		-28.17%	7.0
1	07/11/2019	P/2015/5051	11.57%	6.72%	-4.85%	24.9
1	08/11/2019	PP/2014/6240	20.15%	21.25%	1.10%	7.6
1	11/12/2019	180565FUL	33.22%	21.01%	-12.21%	4.5
1	18/12/2019	P/2014/4968				1.1
1	17/01/2020	PP/2015/4912	7.08%	15.17%	8.09%	4.6
1	18/01/2020	PP/2015/0532	14.17%	8.45%	-5.72%	21.2
1	19/01/2020	PP/2015/3643	35.73%	14.00%	-21.73%	4.6
1	19/01/2020	171246OPDC2	5.33%		-5.33%	
1	14/02/2020	170567FUR3	29.52%	31.27%	1.75%	14.0
1	28/02/2020	164694FUL	2.31%	0.76%	-1.55%	103.0
22	**2019-20**	**Totals & Averages**	**21.12%**	**18.85%**	**-2.27%**	**452.1**
49	**2014-20**	**Combined Totals & Averages**	**22.35%**	**20.58%**	**-1.76%**	**1,471.0**

As noted above the number of schemes where monitoring has commenced has increased over time. The low number of schemes recorded in the earlier period reflect the lag between the introduction of the AEMP system (secured through S106s) and the completion of works, which can be many years. This is as expected, and the number of schemes where monitoring is going live is continuing to grow, although this will likely peak in the next few years. In 2019/20 for example monitoring has commenced on 22 schemes, up from 10 and 5 in 2018/19 and 2017/18 respectively. Looking at the average performance of all schemes reported on for the monitoring period, the actual performance was very close to that originally estimated, with a shortfall variance of only -1.76%. Whilst this result is generally positive there are some significant variations in performance between individual schemes ranging from +19.53% down to -29.03%. A range of factors explain these differences as follows:

In the case of underperformance –

- Technical issues with the initial installation of the LZC measures, resulting in no or reduced output
- Poor maintenance of LZC, resulting in low output
- System failure of LZC measures, resulting in no or disrupted output
- The applicant installing a smaller system than required
- Part installation only in the case of phased schemes

In the case of overperformance –

- Applicant has chosen to install a larger system than originally proposed
- Applicant overestimated the size of the system needed to meet the target

One thing that is evident from this monitoring is that when viewed at an aggregated level the estimated performance of the LZC measures (at design stage) is largely reliable, and this is largely true at the individual case level as well, but significant variance can occur because of technical implementation issues. It should also be pointed out however, that in a number of cases the applicant's original estimated/modelled output at the design stage has had to be tweaked at the request of the LPA to reflect more accurate benchmarks. As noted already the monitoring here is only concerned with the 'be clean' and 'be green' components of the hierarchy, and it is well recognised that the current use of part L modelling to estimate the 'Be Lean' component in particular is not particularly reliable, and this is a matter which will need to be addressed through the new Local Plan.

There are a number of other areas which might require further exploration and attention. Where schemes underperform relative to the original estimates, there needs to be a mechanism to remedy this position. Where underperformance arises because of technical faults this will hopefully have been identified early on in the monitoring cycle and the applicant will have been alerted to such issues, which can be resolved fairly easily and swiftly. In those cases where output (and therefore savings) was overestimated at the design stage, applicants may need to consider a range of on-site remedial measures to rectify any shortfall. Where on-site remedial measures are not practical, one option would be to pursue an additional carbon offsetting payment equivalent to the shortfall. Particular attention also needs to given to the approach taken to monitoring phased schemes. With regard to the performance of particular technologies, setting aside any technical faults, PV often

performs better than energy strategies predict. At present there is insufficient data to meaningfully evaluate Air Source Heat Pumps efficiency.

Over the five years covered by this monitoring report, and relative to earlier monitoring periods, the number of major applications received which triggered the target requirements in policy 5.2 (and now SI 2) has steadily increased. A number of key applications were considered over this period where improvements in the energy performance of the scheme were secured, as follows:

For 2014/15
Sherwood Close, The Oaks Shopping Centre Phase 2, Acton Town Hall (Leisure Centre & Library), Hoover Building and Middlesex Business Centre.

For 2015/16
Perfume Factory, Moulin House, Southall Gas Works S73 application, Elthorne Park High School, Holbrook Building, Malgavita, Castle House Warren Farm and Carphone Warehouse.

For 2016/17
Toplocks Housing Estate, Holbrook House, Monarch House, Malgavita Works, Kings House, Former GlaxoSmith, Beaconsfield School Expansion, and The Portal.

For 2017/18
The Perfume Factory, Former Honda Garage, The Portal, Elthorne Park High School, Orion Park and Sherwood Close.

For 2018/19
Ark Soane School, The Perfume Factory, Former Honda Garage, Ada Lovelace School, Ealing Fields School, The Arches, Acton Gardens, Middlesex Business Centre, Southall Gasworks Phase B and Homebase.

Sustainability performance of schemes

In addition to applying the requirements of London Plan policy 5.2/SI 2 in respect of the energy performance of a building, the Council's local policies seek broader sustainability improvements, and specify standards for certain typologies, using established assessment methodology tools. For example, non-major and major new build residential schemes were required to demonstrate compliance with the Code for Sustainable Homes. Major residential developments solely consisting of the refurbishment of existing buildings (conversions) are required to comply with BREEAM Domestic Refurbishment. Major non-residential developments are required to comply with BREEAM. Such standards require applicants to prepare and submit reports/assessments at different stages of the development process.

During this monitoring period, a number of wider policy changes have been introduced which have had a bearing on the application of a number of these standards.

In 2013, the Government consulted on proposals to reduce the range of local authority standards that apply to housing developments across the country through its Housing Standards Review. On the 27th March 2015, the Government published the Deregulation Bill which introduced a number of key provisions relating to housing standards and energy efficiency and which has direct implications for planning.

The Written Ministerial Statement issued at the time, advised that where local authorities had pre-existing policies in place which specified target levels in relation to the Code for Sustainable Homes (CfSH), that they would need to cease applying such policies, as the Government had withdrawn the Code.

Following the Government's announcement on the withdrawal of the Code, the Council has ceased to apply clauses f and g of its local Development Management policy 5.2. Therefore, new residential applications submitted and determined after the 27th March 2015, or pending applications, were not required to be assessed under the Code for Sustainable Homes. The code continues to apply to 'legacy schemes', i.e. schemes already approved and conditioned to achieve code level 4. New residential applications submitted after 27th March 2015 and any applications that still haven't been determined by the Council's Committee are not required by the Council to be assessed under Code for Sustainable Homes.

Since the scope of the Housing Standards Review was limited to residential developments, it has had no bearing on the implementation of standards relating to non-residential development, and therefore Ealing Development Management policies 5.2 (H) and (I) in relation to BREEAM still apply to these major applications.

Both local and regional policy have established a longstanding ambition to create and expand heating and cooling networks in the borough, as this can be more effective than individual building approaches. The Council have worked with the GLA since 2009 to bring forward decentralised energy networks in the borough. The evidence base for this has progressed from a borough wide heat map (published May 2010) to an energy masterplan for the Southall area (2013). In 2015 the Council commissioned a further study to examine the financial viability of establishing a heat network in Southall, and explored options for the Council to invest in this network, through paying for and renting the use of a transmission pipeline. As a follow up to this work the Council completed a more detailed routing study in 2017 (published July 2017). Whilst the development of networks remains a key part of the overall strategy, the use of more conventional gas powered (CHP) systems as an energy source is now less appropriate as grid electricity is decarbonising. Existing and future networks will therefore be required to transition to zero-carbon heat sources.

Finally, it should be noted that for future monitoring years efforts will be made to also monitor unregulated energy use, and non-operational emissions (i.e. embodied carbon emissions). The new London Plan (2021) introduces a requirement for referable applications (only at present) to prepare Whole Life-Cycle Carbon assessments, which should assist monitoring in this regard.

Policy Indicators

Appeal Decisions

A review of appeals upheld has been undertaken to establish whether such decisions highlight any shortfall with local policies, or question their validity. In this regard there were no appeal decisions which had a direct implication on policy in relation to Flood Risk, Waste, Minerals or Energy for the monitoring period.

Departures

Applications which are not in line with the development plan are required to be formally advertised as departure applications in line with Article 13 of the Town & Country Planning (Development Management Procedure) Order 2010. An analysis of such applications is useful in illustrating where particular pressure points exist in relation to the implementation of the development plan policies. Analysis of departure applications has found no policy departures in respect to Flood Risk, Waste, Mineral Developments or Energy for the monitoring period.