Housing Supply Topic Paper

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1. Scope of topic paper

This topic paper has been prepared to support the Regulation 18 consultation on the new Local Plan.

The paper essentially constitutes a position statement outlining the Council's approach to establishing a housing supply position, and captures what is understood thus far, and what work is pending.

This paper also considers the overriding function underpinning such a supply-based exercise in driving up delivery against the housing requirement and in demonstrating / tracking progress towards this end.

Recognising the various technical challenges currently facing the Council in establishing its supply position, the role and value of other tools in achieving such wider goals is therefore also examined. The paper therefore touches on the interaction between supply and housing delivery, past and anticipated.

The paper should be read alongside the interim AMR published in October 2021, which can be viewed here: Authorities Monitoring Reports (AMR) | Ealing Council.

The paper is organised around the following headings / questions:

- The need to ascertain a supply position
- The approach / methodology to establish and demonstrate Ealing's supply position
- Why Ealing has been unable to publish an up-to-date supply position.
- What other options does the Council have for establishing its supply position or evidencing the likely effectiveness of the plan in meeting the housing requirement.
- The role of regulation 18 in supporting preparation of a 5YHLS and trajectory

2. The need to ascertain a supply position

The Housing Requirement

The NPPF advises that strategic policy-making authorities should establish a housing requirement figure for their area, which shows the extent to which their identified housing need can be met over the plan period.

For London authorities the overall distribution of housing need (as identified within the 2017 London Strategic Housing Market Assessment) lies with the Mayor as opposed to the individual authorities, and there is no policy assumption that the established housing requirements set for each authority will match the need of the individual borough or authority.

Whilst the London Plan remains current (i.e. it was adopted within the last five years), the housing requirement for each authority is established through this plan.

The role of supply in boosting delivery and as a proxy of future performance measured against the Housing Requirement

With the aim of boosting delivery to meet the housing requirement, plan making authorities should set out to identify a supply of suitable sites. The identification of supply itself can assist delivery directly through promoting individual sites. Moreover, the process itself is a key tool in evidencing the likely achievability/effectiveness of the plan in satisfying the housing requirement, and in tracking ongoing progress over the life of the plan.

The NPPF advises at para. 68 that strategic policy-making should establish a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment (SHLAA). Utilising this and other evidence the authority is tasked with identifying a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability, covering the periods as follows:

a) specific, deliverable sites for **years one to five of the plan period; and**
b) specific, developable sites or broad locations for growth, for **years 6-10 and, where possible, for years 11-15 of the plan**.

Years 1-5

In respect of 'a)' above, paragraph 74 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. This is commonly referred to as the 5 Year Housing Land Supply or 5YHLS.

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.

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 5YHLS regularly. This need to maintain a rolling five-year housing land

supply is also key to ensure any appropriate action is taken should a shortfall in delivery against the targets arise at some point during the life of the plan.

Maintaining this understanding is also essential to support the decision-taking process as well, as a local authority may be asked to demonstrate an up-to-date 5YHLS at any point in time in response to an application or appeal. It is important then that this exercise is viewed as a live process, with the position changing with each permission given and every home built. In the absence of being able to confirm the supply position, and whilst the possibility of a shortfall pertains, the NPPF presumption in favour of sustainable development – the so-called 'tilted balance' – is engaged. NPPF paragraph 11d)ii states that in these circumstances the development plan policies most important for determining the application are to be treated as out-of-date.

Years 6-15

As set out above at 'b)' there is a need to identify supply beyond the initial five year period. To this end 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 the full extent of that period, which can then be measured against the overall defined requirement.

In Ealing's case, and recognising the date of the latest Strategic Housing Land Availability Assessment (SHLAA), the trajectory will also effectively act as a supplementary update to the SHLAA which was last prepared in 2017.

As set out above, the 5YHLS, and by extension the housing trajectory, are fundamental building blocks of the new Local Plan. Both support the setting of targets, the allocation of sites and the overall spatial strategy and so completing these remains a priority.

3. The approach / methodology to establish and demonstrate Ealing's supply position

How it can be demonstrated

Paragraph 4 of the National Planning Practice Guidance ('Housing Supply and Delivery') advises that an authority can demonstrate a 5-year land supply in two ways, using the latest available evidence such as a Strategic Housing Land Availability Assessment (SHLAA), Housing and Economic Land Availability Assessment (HELAA), or an Authority Monitoring Report (AMR):

a) 'confirming' the 5-year land supply using a recently adopted plan; or

b) through a subsequent annual position statement (as set out in paragraph 75 of the National Planning Policy Framework).

In addition to the two official routes, and reflecting the stage at which an authority is at in progressing a Local Plan to adoption, many authorities (including Ealing in the past) have sought to evidence their position through a position statement published alongside or part of an AMR.

Having now reached the first formal stage of consultation on a new Local Plan (Regulation 18), the intention is to document the Council's position through supporting evidence supplementing the different iterations of the Local Plan. This may take the form of a topic paper such as this or as a component of future AMRs (including any interim reports). The evidence presented may evolve and vary over time, reflecting the availability of data and the live datasets (now the Planning London DataHub is live). This will culminate in a complete and 'final' 5YHLS position statement and housing trajectory at the Regulation 19 and submission stages, which ultimately would be confirmed on adoption of the plan.

As Ealing is now formally progressing a new Local Plan, it is not the Council's intention at this stage to prepare and submit an annual position statement to be tested and verified by PINS, independent of the process of preparing a new Local Plan.

Methodology

The detailed methodology and steps for calculating the 5YHLS position and preparing the housing trajectory are outlined in the Interim AMR published in October 2021, and so this section should be read alongside that document. To avoid repeating everything set out in the interim AMR, this section provides a brief overview of the steps only, and highlights updates to the methodology since the interim AMR was published.

Five Year Housing Land Supply

In simple terms 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.

REQUIREMENT

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

The interim AMR suggested testing the supply inputs against two different housing requirement scenarios. It was prudent to do this at the time as the authority was operating in a period of transition.

Following the publication of the new London Plan, the first scenario is effectively redundant and the intention is now to proceed only with scenario 2 as follows:

- Utilising the 2021 London Plan housing supply targets to provide a measure of performance against the published policy target.

To facilitate this exercise this target is annualised giving an annual net requirement of 2,157 units. Unlike earlier London Plan targets which were borough based, these targets are now Local Planning Authority (LPA) based, excluding the OPDC demise. Separate targets are set for the OPDC area, and performance against these is measured independently by the Mayoral Development Corporation.

The annualised housing requirement figure is then multiplied by 5, to establish the overall base target for the next five years.

Given that completion activity for 2021/22 has now been recorded, a revised 'starting year' of 2022/23 will be employed.

B – Shortfall/Surplus

As detailed in the interim AMR, 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. Following the 'Sedgefield approach' it is intended that the full extent of any shortfall is carried forward and added to the established requirement for the next 5 years as established at 'A'. Any deficit is to be calculated from the base date of the adopted plan, which is set at 2019/20 for the adopted 2021 London Plan.

At the time of writing completions data is available up to and including 2021/22, and therefore any shortfall is determined examining activity over 3 reporting years as follows:

Table 1 – Net completions performance by year

Reporting Year	Net Completions	Difference against target
2019/20 (base date)	1863	-294
2020/21	1750	-407
2021/22	1083	-1074
Cumulative Total	4696	-1775

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 additional supply in the hope that this will encourage greater delivery at a level which meets or exceeds the requirement.

As noted in the interim AMR the NPPF identifies three potential buffer levels, whose application varies dependent on circumstances.

Notwithstanding the shortfall noted above, Ealing has passed all reported Housing Delivery Tests thus far, and accordingly there is no requirement to apply a 20% buffer at the time of writing.

The Council has also not notified the Planning Inspectorate of an intention to submit an annual position statement, and therefore this update on the 5YHLS does not constitute a formal Annual Position Statement. Under the circumstances it is therefore not necessary to apply a 10% buffer.

The intention remains therefore to proceed with a buffer of 5% at present, with this position remaining under review for future outputs.

SUPPLY

The supply side of the calculation essentially involves determining what supply, and associated level of capacity, is anticipated to be delivered over the next 5 years. At the time of writing and reflecting the latest reporting period for completions, the 'next 5 years' would be taken to mean 2022/23 – 2026/27 (or 1st April 2022 until 31st March 2027). For future calculations this window of time will be rolled forward to follow on from the last period of reporting on completions.

Reflecting the spatial geography of the LPA based target established in the London Plan, only supply from sites in the LPA area will be counted.

Again, to maintain consistency with the methods employed for setting the housing requirement targets, the supply inputs are split into the following categories:

D – Deliverable capacity on large sites

As outlined in the interim AMR particular attention is needed to ensure that the identified supply in this category qualifies as being 'deliverable', guided by the definition and advice contained in the NPPF and NPPG respectively.

As set out later in this paper, establishing accurate and robust datasets to inform this input, remains the most pressing priority at present.

E – Small site capacity

Unlike the large site element which is based on known sites (typically permitted), it would be very challenging to attempt to comprehensively identify and estimate capacity for all small sites, and so a decision has been taken to treat anticipated delivery from small sites as a windfall component. This approach to dealing with small sites as a windfall is consistent with advice contained in the NPPF/NPPG and also the approach taken regionally when setting the housing requirement targets as underpinned by the SHLAA. The SHLAA calculated the deliverable capacity from this source through a hybrid approach of forecasting and modelling.

The London Plan indicates that it considers the SHLAA evidence and small sites target to amount to a reliable source of windfall for the purpose of estimating supply. For the purpose of this exercise, and for consistency and simplicity reasons, it is intended at present that a fixed annual figure of 424 units is utilised, reflecting the current small sites target in the London Plan. Alternative options for determining a small sites component have also been explored and may be revisited at a later date and reflected in future updates.

F – Non-Conventional supply

Again, for reasons of consistency the same assumptions / methodology employed to inform the non-conventional component of the target will be utilised to determine/evidence future supply from this source.

Very simply non-conventional supply is determined based on the net pipeline of approved bedrooms anticipated to be delivered within 5 years. In order to count the contribution of non-conventional accommodation to the supply it is necessary to convert the bedroom measure into units, utilising conversion ratios established in the Housing Delivery test Rulebook.

THE CALCULATION

As noted above the primary purpose of this exercise is to determine if the authority has sufficient supply when measured against the requirement. The interim AMR details the calculation formula as follows:

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

At this stage it is not possible to determine the supply position, pending confirmation of various inputs (notably 'D' and 'F'). Where select inputs are already known however these can be captured as follows:

Table 2 - 5YHLS Summary Position

Component	**Units**
A – Basic Housing Requirement	10,785 *(LPA)*
B – Shortfall	1,775 *(LPA)*
C – Buffer at 5%	628
HR – Cumulative Requirement	13,188 *(LPA)*
D – Large Site Supply	Pending *(LPA)*
E – Small Site Supply	424 *(LPA)*
F – NSC Supply	Pending *(LPA)*
TS – Total Supply	TBC *(LPA)*
Percentage Performance	TBC
Supply in Years	TBC

Housing trajectory

Period covered

It is intended that the trajectory will now cover an 18-year period, examining/forecasting activity between 2019/20 and 2036/27. The period between 2019/20 and 2021/22 is informed by historical completion datasets. The 15 year period from 2022/23 to 2036/37 represents future years and is determined based on forecasting/projections.

Defining targets

At present it is proposed that all years, both past and future, are examined against an annualised version of the 2021 London Plan target, equating to 2,157 units. Whilst the 2021 London Plan targets cover the 10 year period between 2019/20 and 2028/29, it has been decided that for the purpose of this exercise that the Council will roll forward the London Plan target in annualised form to cover the latter period of the trajectory, i.e. 2029/30 – 2036/37. If or when better data becomes available this approach may be modified in future trajectories.

Accounting for past delivery

Whilst the trajectory is principally a forward looking tool, as with establishing the 5 year land supply position, it is necessary to look back and account for historical performance as well. The trajectory will therefore record any deficit or surplus already accumulated since 2019/20, which aligns with the start of the London Plan target period. At the time of writing this involves establishing any unit difference in completion activity when measured against the London Plan target for the initial 3 year period covering 2019/20 – 2021/22.

Supply/Delivery Inputs

The principal input into the Housing Trajectory are annual completions (actual and forecasted). For 'past years' (2019/20 – 2021/22), the figures reporting into the trajectory represent actual completions, and this data is derived from the Planning London Datahub.

For 'future years', which at the time of writing would cover the period from 2022/23 until 2036/27, annual delivery figures are estimated for each year. For all years, only capacity estimated to arise within the LPA area is recorded. Future delivery capacity can be broken down into the following components. Each component is defined to be exclusive to avoid double counting of capacity.

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).
ii. Schemes pending decisions.
iii. Allocations: This comprises the estimated unimplemented conventional capacity from allocated sites. Whilst previously the interim AMR distinguished between adopted and emerging allocations, it is deemed appropriate to examine the emerging allocations only as now presented in the Reg. 18 plan. Where adopted allocations remain unimplemented in part or full, and still support the objectives of the plan, these have been subsumed by the emerging allocations. Accordingly, it is no longer necessary to distinguish between the two sources. To avoid double counting with the historical

datasets and the pipeline, only unimplemented capacity which doesn't benefit from a planning permission would be included under Aiii. Emerging allocations smaller than 0.25 ha are also stripped out.

B - Conventional Small Site Capacity (smaller than 0.25 ha)

As with the 5 YHLS exercise, future anticipated delivery from small sites is based on the fixed annual forecast/modelled figure of 424 units (annualised), as derived from the 2021 London Plan.

C – Non-conventional capacity

Again, consistent with the 5 YHLS exercise, future capacity estimates for the non-conventional component are based on the approvals pipeline only. Although the pipeline may underestimate future delivery when examining a longer time frame covered by the trajectory, it is considered that such limitation will only have a modest effect on the accuracy of overall forecasting.

Assigning capacity to future years

Having determined the capacity inputs, it is necessary to assign this capacity to future years covered by the trajectory based on the anticipated timing of delivery. Delivery in this context means completed units.

For the first five forecast years (2022/23 – 2026/27) then, only sites which qualify as 'deliverable' would be assigned to this period. The inputs here in relation to future delivery will be identical to those contained in the 5YHLS. It is anticipated that the capacity assigned to this period will primarily derive from the pipeline of large conventional sites and non-conventional sites.

It is intended that sites (capacity) assigned to years 6-15 (2027/28 – 2036/37) of the trajectory would meet the definition of 'developable' sites as defined in the NPPF. It is envisaged that proportionally the contribution from the pipeline of existing permissions will be smaller for these years, with more of that capacity deriving from allocations which have yet to be permissioned.

Unlike for the large site and non-conventional 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.

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 the final report.

4. Why Ealing has been unable to publish an up-to-date supply position?

London has changed how it monitors and manages data about planning permissions, and is in the final stages of transition from the London Development Database (LDD), where data was manually supplied, to a live data collection model the Planning London DataHub (PLDH). For more information about this and the transition between systems and how the pipeline is developed see appendix 1.

In part the delay in issuing a complete AMR has been down to this transition to a live system, however throughout this period the Council has sought to maintain an understanding of its housing supply (in so far as the data is available). In this regard, and independent of the AMR, the Council has prepared 5YHLS statements to support decisions on schemes and appeals. The most recent of which was undertaken in June 2019 in response to a pre-application enquiry. This position statement demonstrated that the Council had sufficient supply to meet a period of 7.5 years, however it should be noted that this position statement was prepared using older datasets, and supply was measured against the previous and lower London Plan targets. Given the time which has now passed and the evolution of the targets/requirement, it would not be appropriate to rely on these earlier outputs now. The National Planning Practice Guidance is clear that when preparing a 5YHLS the authority needs to employ adopted housing requirement figures.

Officers have to date not been able to prepare an up to date and robust 5YHLS statement and housing trajectory, which responds to the current adopted housing requirement figures, because they have been unable to access sufficiently accurate and robust development monitoring data needed to confirm Ealing's position regarding the level of supply.

A number of factors have contributed to or compounded this situation as follows:

Data gap

Both the 5YHLS statement and the housing trajectory rely on development data (approvals and completions), and such data is sourced from the GLA's database of permissions and completions. Previously this was the London Development Database (LDD), but the use of this database was terminated in June 2020.

Given delays in rolling out the new platform (the Planning London Datahub), the new platform was not ready to launch in June 2020, with it becoming operational in November 2020. There was therefore a period between June 2020 and November 2020 when no platform was available to capture planning approvals or to record status changes.

At the point of termination in June 2020, Ealing had a backlog of approvals going back to October 2019. Such a backlog in respect of capturing permission details is not unusual. Between October 2019 and November 2020 approximately 500 eligible approvals had been given, which were pending entry onto the Datahub. The contribution of this approved capacity to Ealing's supply is likely to be significant. This incomplete pipeline poses a significant barrier to establishing a 5-year land supply in particular, since most of that supply will derive from capacity already permitted. Projected delivery

beyond that period as addressed through the trajectory will also be supplemented by a number of other sources (i.e. allocations not yet benefitting from permissions etc.).

Whilst this data gap (October 2019 – November 2020) was technically closed in May 2022, considerable ongoing work is needed to cleanse the data to get it to a sufficiently robust and accurate state. Amongst other steps, this involves capturing the latest status changes (starts, completions, lapsing, superseding etc) for individual schemes to determine if they should count towards the pipeline. In addition, to minimise incidences of double counting, permissions need to be linked where they relate to the same site. This detailed ongoing work is critical to ensure that the pipeline is in a sufficiently robust and useable state to inform the preparation of the 5 Year Housing Land Supply and Housing Trajectory, and remains an ongoing priority for officers.

Process related challenges

In addition to the data gap issue itself, the functionality of the database and related working practices, has also posed certain challenges. To maintain an acceptable level of accuracy this has increased the amount of time officers have to spend reviewing and cleansing data.

Actions Taken

Council officers have been working closely and proactively with colleagues at the GLA to ensure that the data is accurately captured. To this end the GLA recruited additional officers to support the initial data migration exercise, and Ealing officers have worked closely with them to carry out this exercise.

Ealing, along with a number of neighbouring authorities in West London, have also met regularly with the GLA to try to work through solutions in respect of this exercise and other matters relating to the new database.

The GLA have provided a note which outlines this process in part and actions taken which is appended to this report.

5. What other options does the Council have for establishing its supply position or evidencing the likely effectiveness of the plan in meeting the housing requirement?

Attempting to establish a supply position without utilising the PLD and pipeline data

Pending the completion of the initial data migration exercise to plug the data gap, the Council explored the option of utilising other sources of data. It was noted that a number of other boroughs have published 5YHLS statements within the last few years. In most cases however such exercises drew from the GLA's previous database (the London Development Database), to establish an earlier pipeline position. This pipeline has then been supplemented manually to account for more recent approvals which at the time hadn't yet been migrated into the DataHub. Dependent on the gap and the associated number of missing approvals this approach may be manageable, but it is not without risks. In Ealing's case the gap (in time and number of cases) is very sizeable, and reconciling data independent of the platform would be extremely difficult to do and would likely result in significant errors, including double counting. Undertaking a similar exercise in Ealing was therefore largely discounted.

Notwithstanding such challenges, a high-level analysis of supply was undertaken as part of the initial Spatial Options work. This analysis attempted to estimate supply over a 20 year period covering 2020-2040. This exercise identified supply totalling 40,714 units, which is marginally short of a current London Plan target if calculated to cover a 20 year period (i.e. 43,190). It is important to note that the inputs examined here were intended to be 'work in progress'. Further checks in particular are needed to verify the status of various inputs and to consider the interaction of the different inputs to minimise for incidences of double counting.

Table 3 - Indicative Supply Outputs (Spatial Options Report)

	Number of homes, 2020-2040	**Notes**
London Plan Target	**43,190**	Source: London Plan
Planning permission pipeline (GLA data)	*13,584*	Source: Permissions data from GLA.
Planning permission pipeline (Ealing data)	*10,818*	Permissions data collected by Ealing for the 'gap in 2019/20' where GLA were not collecting data.
Total planning permission pipeline	**24,402**	GLA + Ealing permissions data
Existing site allocations	*2,290*	Taken from 2nd Draft Preferred Sites List at 25 March 2022.
Part of existing site allocations	*5,542*	Taken from 2nd Draft Preferred Sites List at 25 March 2022.
Total Existing allocations	**7,832**	Existing site allocations + part existing site allocations
Small sites contribution	**8,480**	London Plan Small Sites Allowance
Total Supply	**40,714**	Total planning permissions, allocations and small sites contribution
Net requirement remaining	**2,476**	Number of dwellings left to meet the target set out above.

What supply info does the Council hold already beyond the pipeline?

In addition to data from the PLDH, further intelligence exists in respect of other sources, namely allocations. Capacity figures have been determined for all site allocations forming part of the Regulation 18 plan where these contain an identified residential component.

The Site Selection Methodology Report details the approach taken to determine capacity for each site. In summary a sequential approach was taken. Priority in the first instance was given to basing the calculations on planning history where this was deemed to reflect the latest optimum position. Secondly, where sites had been the subject of more detailed site capacity work as a part of other recent studies the estimates reflect this work. Where neither of these steps are available, it has been necessary to revert to calculating capacity utilising Arup's assessment tool.

Based on the outputs of this exercise at Reg. 18 stage a combined capacity total of 40,991 units has been identified from the development sites. This represents a sizable number against the requirement figure.

A number of limitations should be noted however. Whilst net figures have been determined for most sites, with losses of existing units being subtracted from any gains, accurately determining existing units in all cases can be difficult. Such data will therefore be refined should better data become available. A number of the allocation sites also benefit from extant permissions covering all or part of the site, and accordingly the capacity from such sites would also form part of the pipeline input. Such inputs need to be isolated and removed to avoid double counting which could inflate the overall supply position.

It should be noted too, that that the combined total here derives from both large and small allocations. Capacity from small sites would also need to be isolated and removed to avoid double counting occurring with the separate small sites input.

Further work is also needed to determine how such capacity should be assigned in respect of future phasing. With the exception of certain permitted capacity, it is anticipated that much of the capacity from allocated sites will be principally delivered from years 6 onwards. The contribution of these sites to years 1-5 is therefore more limited.

Alternative supply or non-supply based indicators / measures

Strategic Housing Land Availability Assessment (SHLAA) 2017

In the absence of the necessary pipeline data to confirm the actual supply position, it may be appropriate to consider the likely probability of the Council having the supply needed, utilising the London Strategic Housing Land Availability Assessment (a key piece of evidence examining supply/capacity).

The SHLAA should be the starting point of any examination of supply. The SHLAA is key for two reasons, 1) it sets the targets which the Council is measuring the supply against, and 2) it evidences the supply of sites and capacity. The new London Plan targets are solely supply based, and a direct output of this supply-based exercise (the SHLAA). The London Strategic Housing Land Availability Assessment (SHLAA) 2017 details London's capacity for new homes for the ten (10) year period covering 2019/2020 to 2028/2029. The methodologies used to determine the capacities calculated by the London SHLAA 2017 are documented in Chapters 2, 6 and 7 of the assessment.

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.

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 units per annum) 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.

The London SHLAA 2017 identified a total capacity of 28,070 net additional units in the Ealing LPA area, which are expected to be delivered during the 10-year London Plan target period. It should be noted that the publication of the SHLAA report pre-dated the EIP for the new London Plan, and some of the assumptions/figures (around the small sites component) have been adjusted since. This has resulted in a revised ten-year supply and target figure of 21,570. Importantly, based on the moderated figures, the Panel of Inspectors were satisfied that the SHLAA represented a credible evidence base around future supply and delivery. Based on this earlier exercise at least it might then be reasonable to assume that Ealing would probably have sufficient supply, because had that not been proven already through the London SHLAA, the target set for Ealing now (and which is used for this measurement) couldn't have been established.

Housing Delivery Test (HDT)

It is also appropriate to reflect on the purpose of the supply-based exercise. Ultimately the identification of supply in itself is not the overriding goal – but rather it should be viewed as a step which is intended to facilitate greater delivery, whilst also evidencing the likely achievability of the plan. Examining recent past delivery might therefore represent a better measure.

In the context of Planning, the official measure of housing delivery is the Government's Housing Delivery Test (HDT). 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.

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). The latest and fourth set of results were published in January 2022, and cover the period from April 2018 to March 2021. To account for the disruption to housing delivery caused by the restrictions in response to the COVID-19 pandemic, adjustments were made both to the 2020 and 2021 Housing Delivery Test measurements, which has involved reducing the homes required targets for 2019/20 and 2020/21 by one and four months respectively. For the 2021 measure delivery is therefore measured against a 31 month requirement, in contrast to the standard 36 month requirement used to calculate earlier tests.

The results for the first four annual measurements are set out below.

Table 4 - Housing Delivery Test: 2018 measurement

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 5 - Housing Delivery Test: 2019 measurement

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 6 - Housing Delivery Test: 2020 measurement

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

Table 7 - Housing Delivery Test: 2021 measurement

Number of homes required			**Total number of homes required**	**Number of homes delivered**			**Total number of homes delivered**	**Housing Delivery Test: 2021 measurement**	**Housing Delivery Test: 2021 consequence**
2018-19	**2019-20**	**2020-21**		**2018-19**	**2019-20**	**2020-21**			
1297	1662	1436	4395	1746	1863	1750	5359	122%	None

As detailed above Ealing has comfortably and consistently passed this test since its introduction in 2018, with no intervention / actions being triggered. Whilst it is recognised that the HDT and supply tests relate to different periods, and for select years even employ different requirement figures, preventing direct comparisons from being made, the HDT results nonetheless provide a good indicator / proxy of the general direction of performance. The Council's recent good performance in respect of delivery is also indicative perhaps that Ealing has been maintaining a healthy pipeline of permissions and supply, even if that supply is not fully quantifiable at present.

6. The role of regulation 18 in supporting preparation of a 5YHLS and trajectory

As described in section 3 above, the process of preparing both the 5YHLS and Housing Trajectory is iterative, reflecting the availability of information and live datasets.

The Regulation 18 stage provides an important opportunity to verify and validate site specific inputs and assumptions. Specifically, it will allow officers to test the availability and deliverability of sites / permissions with land-owners, developers, site promoters, and the knowledge gained from this exercise will be invaluable in preparing and refining the 5YHLS and trajectory. Amongst other things this exercise will allow officers to test a range of assumptions and recorded criteria for individual sites including:

- Capacity estimates for individual sites
- Phasing assumptions, and therefore 'deliverability' and 'developability' status
- Preferred use(s)
- Status and intentions regarding extant permissions
- Constraints

Following Regulation 18, further updates will be made to site inputs. As noted above additional and related work is also ongoing to 'cleanse' the data captured in the system, and a number of steps are also being put in place to improve work processes. Ultimately this will assist in ensuring that the pipeline is sufficiently accurate for the purpose of informing the preparation of the 5YHLS and Housing Trajectory.

Appendix 1 – Pipeline methodology

Agreed note between GLA and Ealing Council

GREATER LONDON AUTHORITY

The purpose of developing a pipeline is to understand better the potential number of dwellings that might be delivered within the local planning authority area, together with their typology and tenure.

No model for delivering a housing pipeline is perfect. This is for a number of reasons, amongst others including:

1.	We are able to model the exact number of dwellings that have been granted planning permission, but there is no guarantee that all or any that have been granted planning permission will be delivered. This is a key characteristic of a market led housing delivery model, meaning that assumptions have to be reached about likelihood of delivery.

2.	The tenure of the housing (whether it falls within the definition of affordable housing or not) may change as a result of market conditions, and other material planning considerations.

3.	Planning permissions must be implemented within the lifetime of consent (as specified by section 56 of the Town & Country Planning Act 1990 (as amended)) as such the pipeline can only ever be a snapshot in time, as planning permissions lapse or are implemented, or even housing numbers delivered, each day.

There are numerous other potential risks and issues around delivering a perfect pipeline model, and any interested parties should spend time reviewing the data to understand better its limitations.

How Is The Data Prepared?

Prior to 2020, local planning authorities in London prepared a single submission to the London development database (LDD) on an annual basis recording all grants of planning permission for loss or gain of dwellings, large commercial developments, and public open space. This was supported by an annual submission of starts and completions for each development reported.

In the autumn of 2020 as part of an initiative to open up data in the planning process, and improve transparency of decision-making for Londoners, the Mayor of London launched the Planning London DataHub. This now receives and publishes data about planning applications across London on a daily basis, enabling pan London analysis of what is changing. This includes all planning applications in the planning process not just those granted planning permission. The system is in its infancy, and to produce a single pipeline report the following actions were required:

1.	A review of all applications that had not yet been reported to the LDD (this included applications that were missed for number of reasons, appeal decisions where planning

	permission had been granted through this route during the transition process and applications that have not yet been determined at the time of shutdown of the LDD)

2.	A review of applications received prior to the launch of the data hub, for which no date had been supplied; and

3.	A review of all applications submitted since the launch of data hub to ensure data have been submitted for all applications.

Actions 1-3 have now been completed resulting in a single register of all planning permissions resulting in the gain or loss of dwellings across the borough.

A full list of applications where planning permission for the loss or gain of any dwellings can be found by following this link Ealing residential pipeline - London Datastore.

This list includes schemes in the OPDC area, however these can be filtered out to ensure only sites for which Ealing is the local planning authority to be considered.

Refining the Data

A single list of the permissions does not reflect the full picture of the pipeline for Ealing. Further clarification is required relating to a number of circumstances including:

- Where planning permissions are on the same or overlapping sites, which elements of a planning permission are capable of implementation. This is often referred to as superseding. In many cases this can be straightforward, where it is obvious which development is being carried out, however in some cases, such as strategic sites or large-scale redevelopments, developers may have multiple permissions of which they cherry pick which elements are implemented.

To understand and get a quick grasp of the extent of superseding needed, a map query using all of the extent of the polygons relating to planning permissions has been undertaken. This has meant that the vast majority of superseding cases have been addressed in the dataset.

- The datasets is a partial dataset relating to 88,027 applications in the PLDH of which 1,863 are relevant permissions relating to 20,106 residential units, for which we believe there is a error rate of less than 1%, however the dataset continues to be under review to enable it to be refined and improved, having regard to new information found out about developments, and the likelihood of them proceeding.

- Many of the developments will not be viable for a developer to proceed with, or alternative, more viable lucrative uses have been found for the sites. As more information is discovered, the dataset will be refined.

- No assumption has been undertaken yet as to what percentage of these developments will be carried out, however as the plan progresses, assumptions will be reached and shared based on previous evidence of delivery.

Notes about Starts and Completions

The borough undertakes an annual starts and completions review in accordance with published Government guidance. This identifies any development that have resulted in permission for a dwelling having been commenced, together with actual dwellings delivered. The relevant period for this is the beginning of April to the end of March annually.

The data is submitted in the autumn of each year as part of the Housing Flow Return (HFR).

The methodology for this is different in each borough across London, however in Ealing a number of existing datasets are used to identify commencement and completions, these include building regulation data and council tax data.

The data is submitted on an annual basis as part of the housing flow return managed by the Greater London Authority on behalf of all of the boroughs in London.

Given the annual survey is predominantly a desk exercise supported by a limited number of site visits, it is recognised that this has weaknesses, and it is not uncommon for authorities to amend their HFR return the following year.