

Five Year Housing Land Supply Position Statement & Housing Trajectory

November 2023

Version 1.2



Executive Summary

- Utilising the current London Plan delivery target (2,157 annualised), the baseline requirement figure for Ealing over the next 5 years is 10,785 net additional units.
- Accounting for under-delivery occurring during the first four years of the London Plan target period, a shortfall of 2,262 units is added to the baseline requirement figure. Applying a 20% buffer to both adds a further 2,609 units, giving an overall cumulative requirement of 15,656 net additional units over the next five years.
- In respect of supply the exercise has identified a supply of deliverable large sites capable of delivering 9,341 units over the next five years. Utilising the current small sites target in the London Plan a contribution of 2,120 units is added to this supply. A further contribution of 260 units has been identified from the pipeline of non-conventional permissions. Combined the total supply anticipated to be delivered over the next five years equates to 11,721 units.
- When measured against the cumulative requirement the identified supply equates to 75% of this total, with an absolute shortfall of 3,935 units. This equates to 3.7 years of supply.
- The Housing Trajectory which examines actual and projected delivery/supply over a longer 19 year period indicates that cumulative completions totalling 47,937 net units will exceed the cumulative requirement figure of 40,983 units. In part a reflection of the available evidence at present, the projections show that performance is not consistent throughout this period.
- Annual completions fall short of the annual requirement until 2024/25. This lack of capacity from completions and the approval pipeline during the initial period of the trajectory is offset during ('future') years 3-11 through an increased level of capacity identified from the allocations. As a cumulative measure the shortfall between completions and requirement is closed in 2028/29, and significantly it can be concluded that the projected cumulative delivery will meet the 10 year requirement before the end of the London Plan target period in 2028/29.

Introduction

This document comprises the Council's Five Year Housing Land Supply (5-YHLS) position statement and housing trajectory which has been prepared to support the preparation of the emerging Local Plan.

The Council published an interim AMR in October 2021 which omitted to include a 5-YHLS statement and housing trajectory pending ongoing work around key datasets. The Council provided a further update on this work in November 2022 as part of the Housing Supply Topic Paper. Both of these earlier documents provide useful contextual information for the outputs now contained here, and can be viewed here:

[Authorities Monitoring Reports \(AMR\) | Ealing Council](#)

[Housing Supply Topic Paper | Ealing Council](#)

This document is organised around the following sections:

- The purpose of a 5-YHLS and Housing Trajectory, addressing policy requirements and the interface/relationship between both outputs
- 5-YHLS methodology
- 5-YHLS findings
- Housing Trajectory methodology
- Housing Trajectory findings
- Next steps (Including reference to future updates)

The purpose of a 5 YHLS and Housing Trajectory

The Housing Requirement

The NPPF (September 2023) 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 National Planning Policy Framework (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 5-YHLS, 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.

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.

As Ealing is 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.

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.

Ealing’s 5 Year Housing Land Supply

Methodology for calculating Ealing’s Five Year Housing Land Supply

Very simply 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 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.

Ealing's Core Strategy which previously established a local housing requirement reached its fifth anniversary in 2017 and is therefore not current for the purpose of this exercise.

This target was subsequently superseded by those contained in the 2015 London Plan and more recently the 2021 London Plan. Policy H1 of this plan establishes the current requirement for this purpose setting a delivery target of 21,570 net additional units to be delivered over a 10 year period.

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.

Although the new London Plan intentionally no longer annualises these figures, for the purpose of this exercise, it has been necessary to do this, giving an annual net requirement of 2,157 units. The annualised housing requirement figure is then multiplied by 5, to establish the overall base target for the next five years.

For the purpose of this exercise the 5 year period should follow on from the last reporting year for completions. Given that completion activity for 2022/23 has now been verified, a revised 'starting year' of 2023/24 has been employed.

B – Shortfall/Surplus

In calculating the cumulative housing requirement figure for the next 5 years, alongside the baseline figure, it is also 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.

At the time of writing completions data is available up to and including 2022/23, and therefore any shortfall is determined examining activity over 4 reported years as detailed in table 1 below.

Table 1 – Net completions performance by year

Reported Year	Net Completions	Difference against target
2019/20 (base date)	1863	-294
2020/21	1565	-592
2021/22	1080	-1077
2022/23	1858	-299
Cumulative Total	6551	-2262

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.

The NPPF (September 2023) 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.

At the time of writing, Ealing has passed all Housing Delivery Tests published thus far, although the last results published (2021) covered up to and included activity occurring in 2020/21. Despite now being well overdue (expected in Nov 22) Government has not published the 2022 HDT results for 21/22. Moreover the 2023 HDT results are now also due. To future proof the outputs of this exercise it is prudent to have regard to the predicated results. Indicative results for both pending years are detailed below, although these shouldn't be taken as the published position.

Table 2 – Predicted HDT result for 2022

Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2022 measurement
2019-20	2020-21	2021-22		2019-20	2020-21	2021-22		
1662	1436	2157	5225	1863	1565	1080	4508	86%

Table 3 – Predicted HDT result for 2023

Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2023 measurement
2020-21	2021-22	2022-23		2020-21	2021-22	2022-23		
1436	2157	2157	5750	1565	1080	1858	4503	78%

Based on the predicted results delivery in the previous three years has fallen below 85% of the requirement and therefore a 20% buffer is to be applied, with this position remaining under review if circumstances change or the final published results vary.

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. This can be informed by a range of sources including amongst other things the latest pipeline data of planning permissions, and the estimated yield from allocations and windfall. The objective 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. At the time of writing and reflecting the latest reporting period for completions, the 'next 5 years' is taken to mean 2023/24 – 2027/28 (or 1st April 2023 until 31st March 2028). 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.

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 sites, 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. The following definitions are employed in respect of conventional and non-conventional accommodation:

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.

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 as presently recorded employs a bedroom rather than a unit measure. In order to count and measure the contribution of NSC accommodation it is necessary to convert the bedroom measure into units.

D – Deliverable capacity on large (Conventional) 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 five 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 five 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 five 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 for the next five years:

- 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. This component makes up the bulk of the identified supply underpinning the 5 YHLS calculations. Furthermore, where there are multiple overlapping permissions for a given development site, superseded units are not included in the assumed delivery to avoid double counting in respect of site yield.
- 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 being 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 – Conventional 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 (annualised) 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 (any size)

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 permitted 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 as follows:

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

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

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

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

5 YHLS Findings

Table 4 – 5YHLS Summary Position

Component	Units
A – Basic Housing Requirement	10,785
B – Shortfall	2,262
C – Buffer at 20%	2,609
HR – Cumulative Requirement	15,656
D – Large Site Supply	9,341
E – Small Site Supply	2120
F – NSC Supply	260
TS – Total Supply	11,721
Percentage Performance	75%
Supply in Years	3.7

Utilising the current London Plan delivery target (2,157 annualised), the baseline requirement figure for Ealing over the next 5 years is 10,785 net additional units.

Accounting for under-delivery occurring during the first four years of the plan target period, a shortfall of 2,262 units is added to the baseline requirement figure. Applying a 20% buffer to both adds a further 2,609 units, giving an overall cumulative requirement of 15,656 net additional units over the next five years.

In respect of supply the exercise has identified a supply of deliverable large sites capable of delivering 9,341 units over the next five years. Utilising the current small sites target in the London Plan a contribution of 2,120 is added to this supply. A further contribution of 260 has been identified from the pipeline of non-conventional permissions. Combined the total supply anticipated to be delivered over the next five years equates to 11,721 net units.

When measured against the cumulative requirement the identified supply equates to 75%, with an absolute shortfall of 3,935 units. This equates to 3.7 years of supply.

Ealing's Housing Trajectory

Methodology for preparing the Trajectory

This section outlines the methodology employed, any assumptions used and broad ground rules. The detailed trajectory in spreadsheet form is appended to this report.

Period covered

As prepared the trajectory covers a 19-year period, examining/forecasting activity between 2019/20 and 2037/38. The period between 2019/20 and 2022/23 is informed by historical completion datasets. The 15 year period from 2023/24 to 2037/38 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 – 2037/38. If or when better data becomes available, or targets are revised, this approach may be modified in future trajectories.

Within the trajectory itself the targets are shown both at an individual annual level and as a cumulative requirement.

Supply/Delivery Inputs

The principal 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.

Accounting for past delivery

Whilst the trajectory is principally a forward looking tool, as with calculating the 5 year land supply position, it is necessary to look back and account for historical performance as well. The trajectory therefore records 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 4 year period covering 2019/20 – 2022/23.

Future delivery

For 'future years', which for this iteration of the trajectory covers the period from 2023/24 until 2037/38, 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, as detailed in the Projections Summary Table tab of the appended spreadsheet. 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: 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. Allocations: This component is intended to capture capacity anticipated to be delivered over the plan period from site allocations. A sequential approach has largely been followed to arrive at a capacity yield for each allocation, typically favouring capacity outputs from relevant extant permission data and more detailed design based capacity work, before reverting to using an excel based capacity tool.

In certain cases these allocations will already benefit from extant permissions covering part of or all of the allocation site. Where such permissions are deemed to represent the probable outcome of a given site, the permitted capacity figures inform the trajectory inputting via the pipeline or pending tabs instead.

More detailed design-based capacity work has also been undertaken for tall building sites, and typically for these allocations the capacity figures plugging into the trajectory derive from these studies.

Where a site hasn't been subject to such design work, and where a site doesn't benefit from a live permission, or it is envisaged that development may take a different course from that currently permitted, then the capacity yield for each site has been calculated separately utilising a capacity calculator tool, and inputs into the trajectory via the allocations tab. This tool builds from the excel based capacity assessment tool devised for Reg. 18, and is designed around the following principles/assumptions:

- Entails a spatial calculation that yields indicative figures for dwelling numbers and employment floor space on a site-by-site basis.
- A multi-stage capacity tool that incorporates design-led guidance from GLA's *Optimising Site Capacity: A Design-led Approach (2023)* to meet London Plan's Policy D1, Policy D3 and Policy D4 and DLUHC's *National Design Guide (2019)*.

- Incorporates site-specific assumptions including: Site constraints, developable areas, residential/employment area ratios, building efficiencies (specific to uses), residential accommodation mix and storey heights (in line with Ealing's Tall Building Strategy).
- Assumes a residential figures target mix of **25% 1-Beds, 33% 2-Beds & 42% 3-Beds flats and 45% 3-Beds and 55% 4-Beds for houses** (reflective of Ealing's 2022 *Local Housing Needs Assessment*).
- Site-specific constraints are aligned with Stage 2 suitability assessment data.
- The methodology also incorporates numerical data from GLA's 2023 *Indicative Site Capacity Calculator* template.
- Residential densities (measured by dwelling/per hectare) and employment/mixed-use densities (measured by plot ratio) are sense-checked against various sources of public and private-sector evidence and guidance, notably DLUHC's *National Design Guide* for town centres, urban neighbourhoods and suburbs densities.

A copy of the capacity tool template is also included within the detailed trajectory for information.

When assigning capacity to the relevant inputs, particular attention is paid to minimise for any instances of double counting across the various inputs. Ultimately only one outcome can be delivered on any given site, and that may take the form of an extant permission, a future permission, or in some cases a hybrid of the two avoiding any overlapping coverage. Emerging allocations smaller than 0.25 ha are also stripped out from this input.

- iv. Large Site Windfall: This component captures future capacity arising from policy interventions which potentially have quite a significant geographical scope, but where specific site opportunities have not been identified or nominated, and therefore it is not possible to apply the standard capacity calculator. At present this input captures the potential contribution arising from LSIS sites based on the application of a mixed intensification approach. Reflecting various unknowns, conservative assumptions have been employed to generate a capacity yield from these areas.

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.

NSC accommodation is not included in the assessment of capacity on small sites, which is based on completions trends for 'conventional' self-contained housing (Use Class C3), alongside modelling which examines the scope to increase these trends, taking into account the small sites policy in the London Plan.

C – Non-conventional capacity (from sites of all sizes)

Again, consistent with the 5-YHLS exercise, future capacity estimates for the non-conventional component are principally based on the approvals pipeline. As a slight departure from this approach, for the trajectory this approvals input is also supplemented by NSC capacity identified from pending NSC schemes. It should be noted also that the NSC inputs are derived from schemes / sites of all sizes (i.e. the 0.25 hectare threshold is not applied to this component).

Assigning capacity to future years

Having determined the capacity inputs, this capacity has then been assigned 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 (2023/24 – 2027/28) 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 informing the 5YHLS calculation, and most of the capacity derives from the pipeline of permissions established already.

Site capacity assigned to years 6-15 (2028/29 – 2037/38) of the trajectory has been tested to 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.

It is envisaged that proportionally the contribution from the pipeline of existing permissions will be smaller for years 6-15 diminishing over time as permissions are built out, but is compensated by increased capacity from allocations which have yet to be permissioned. Years 11-15 in particular also comprises a larger proportion of the windfall capacity.

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. This is considered to be the 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.

Site specific information, for example phasing plans, have been utilised where available. Where such information doesn’t exist phasing has been guided by the following broad assumptions as set out in table 5.

Table 5 – Phasing Assumptions

Scenario	Planning activity status	Site Status	Suggested Period	Suggested Phasing in Trajectory	Notes
1	Completions	Sites completed by 31 March 2023	Reporting Year	Completions between 1 April 2022 and 31 March 2023 are counted in the reporting year.	
2	Under Construction and prior approvals (full detailed permissions only)	Sites <10 new residential units under construction at 31 March 2023	1-5 years	100% completed in year 1	These phasing assumptions can be tweaked if necessary to ensure supply looks reasonably spread across each of the first 5 years.
3		Sites of 10-100 new residential units under construction at 31 March 2023	1-5 years	Split 50% in year 1, 50% in year 2	
4		Sites of 100-250 new residential units under construction at 31 March 2023	1-5 years	Split 33% in year 1, 33% in year 2 and 34% in year 3	
5		Sites of 250-500 new residential units under construction at 31 March 2023	1-5 years	Assess on site by site basis but should all be able to go in 5 years unless specific site knowledge suggests otherwise.	
6		Sites of 500+ new residential units under construction at 31 March 2023	1-5 years	Assess on site by site basis but should all be able to go in 5 years unless specific site knowledge/circumstances (scale/building progress) suggests otherwise.	
7	Full/detailed Planning Permission – not commenced	Sites <10 new residential units not started at 31 March 2023	1-5 years	Assume 100% delivery in a single year (year 2 or year 3 or year 4)	These assumptions can be tweaked if necessary to ensure supply looks reasonable across each of the first 5 years.
8		Sites of 10-100 new residential units not started at 31 March 2023	1-5 years	Split between years 2-5 as required. Suggestion 50% year 2 and 50% year 3	Suggest that in future an attempt to contact developer, land owner, agent etc needs made. However as site has full planning permission can be included within first 5 years <u>unless evidence suggests otherwise.</u>
9		Sites of 100-250 new residential units not started at 31 March 2023	1-5 years	Split between 5 years to be determined on site by site basis (i.e. how long since permission granted, how many units etc. Suggested build out period 3 years (years 2, 3 &4).	Suggest that in future an attempt to contact developer, land owner, agent etc needs made. However as site has full planning

Scenario	Planning activity status	Site Status	Suggested Period	Suggested Phasing in Trajectory	Notes
					permission can be included within first 5 years <u>unless evidence suggests otherwise.</u>
10		Sites of 250-500 new residential units not started at 31 March 2023	1-5 years	Split between 5 years to be determined on site by site basis (i.e. how long since permission granted, how many units etc. Suggested build out period 4 years (years 3, 4, 5 & 6).	Suggest that in future an attempt to contact developer, land owner, agent etc is made. However as site has full planning permission can be included within first 5 years <u>unless evidence suggests otherwise.</u>
11		Sites of 500+ new residential units not started at 31 March 2023	1-7 years	Split between 5 years to be determined on site by site basis (i.e. how long since permission granted, how many units etc. Given likely scale of building form 'first completions' may occur later (i.e. over years 3, 4, 5, 6, 7)	Suggest that in future an attempt to contact developer, land owner, agent etc is made. However as site has full planning permission can be included within first 5 years <u>unless evidence suggests otherwise.</u>
12		Sites <10 new residential units not started at 31 March 2023	5-6 years	Suggest phasing straddles 5 year periods (years 5-6)	
13		Sites of 10-100 new residential units not started at 31 March 2023	6-10 years	Split over 6-10 year period. May wish to assess on site by site basis to see if there is evidence can move to 0-5 (i.e. S106 close to being signed). Assume 2 year build out period. Suggest 50% year 6 and 50% year 7.	Can be included in 0-5 if there is clear evidence that housing completions will begin on site within five years
14	Outline Planning Permission or S106 pending (with resolution to grant)	Sites of 100-250 new residential units not started at 31 March 2023	6-10 years	Split over 6-10 year period (i.e. S106 close to being signed). Suggested build out period 3 years (years 6,7 & 8).	Can be included in 0-5 if there is clear evidence that housing completions will begin on site within five years
15		Sites of 250-500 new residential units not started at 31 March 2023	6-10 years	Split over 6-10 year period (i.e. S106 close to being signed). Suggested build out period 4 years (years 6, 7, 8 & 9).	Can be included in 0-5 if there is clear evidence that housing completions will begin on site within five years, although perhaps assume that only a proportion

Scenario	Planning activity status	Site Status	Suggested Period	Suggested Phasing in Trajectory	Notes
					could complete in 0-5.
16		Sites of 500+ new residential units not started at 31 March 2023	6-10 years	Split over 6-10 year period (i.e. S106 close to being signed). Suggested build out period 5 years (years 6, 7, 8, 9 & 10).	Can be included in 0-5 if there is clear evidence that housing completions will begin on site within five years, although perhaps assume that only a proportion could complete in 0-5.
17	Pending consideration (i.e. without resolution to grant)	Sites <10 new residential units not started at 31 March 2023	6-10 years	100% completed in year 6	Can be included in 0-5 if there is clear evidence that housing completions will begin and complete on site within five years
18		Sites of 10-100 new residential units not started at 31 March 2023	6-10 years	Split over 6-10 year period. May wish to assess on site by site basis to see if there is evidence can move to 0-5 (i.e. S106 close to being signed). Assume 2 year build out period. Suggest 50% year 6 and 50% year 7.	Can be included in 0-5 if there is clear evidence that housing completions will begin and complete on site within five years
19		Sites of 100-250 new residential units not started at 31 March 2023	6-10 years	Split over 6-10 year period (i.e. S106 close to being signed). Suggested build out period 3 years (years 6,7 & 8).	
20		Sites of 250-500 new residential units not started at 31 March 2023	6-10 years	Split over 6-10 year period (i.e. S106 close to being signed). Suggested build out period 4 years (years 7, 8, 9 & 10).	
21		Sites of 500+ new residential units not started at 31 March 2023	6-10 years	Split over 6-10 year period (i.e. S106 close to being signed). Suggested build out period 5 years (years 7, 8, 9, 10, 11).	
22	Pre-application interest only	Sites <10 new residential units not started at 31 March 2023	6-10 years	50% completed in year 6, 50% in year 7	
23		Sites of 10-100 new residential units not started at 31 March 2023	6-10 years	Split over 6-10 year period. May wish to assess on site by site basis to see if there is evidence can move to 0-5 (i.e. S106 close to being signed). Assign to 3 year window – years 6, 7, 8	

Scenario	Planning activity status	Site Status	Suggested Period	Suggested Phasing in Trajectory	Notes
24		Sites of 100-250 new residential units not started at 31 March 2023	6-10 years	Split over 6-10 year period (i.e. S106 close to being signed). Suggested build out period 3 years (years 6,7 & 8).	
25		Sites of 250-500 new residential units not started at 31 March 2023	6-10 years	Split over 6-10 year period (i.e. S106 close to being signed). Suggested build out period 4 years (years 7, 8, 9, 10).	
26		Sites of 500+ new residential units not started at 31 March 2023	7-11	Split over 7-11 year period (i.e. S106 close to being signed). Suggested build out period 5 years (years 7, 8, 9, 10 & 11).	
27	No planning activity/interest of note	Sites <10 new residential units not started at 31 March 2023		50% completed in year 7, 50% completed in year 8	
28		Sites of 10-100 new residential units not started at 31 March 2023		Spread over 3 year period. Suggest 33% year 7, 33% year 8 & 33% year 9	
29		Sites of 100-250 new residential units not started at 31 March 2023		Spread out over 4 years (years 8, 9, 10 & 11).	
30		Sites of 250-500 new residential units not started at 31 March 2023		Spread over 5 (years 8, 9, 10, 11 & 12)..	
31		Sites of 500+ new residential units not started at 31 March 2023		Spread over 6 years (years 8, 9, 10, 11, 12, 13).	
32	Windfall Large	Sites <10 new residential units not started at 31 March 2023		Spread over 4 year period (9, 10, 11 & 12)	
33		Sites of 10-100 new residential units not started at 31 March 2023		Spread over 4 year period (9, 10, 11 & 12)	
34		Sites of 100-250 new residential units not started at 31 March 2023		Spread out over 5 years (years 9, 10, 11, 12 & 13)	
35		Sites of 250-500 new residential units not started at 31 March 2023		Spread over 7 years (years 9, 10, 11, 12, 13, 14, 15)	
36		Sites of 500+ new residential units not started at 31 March 2023		Spread over 5 (years 9, 10, 11, 12, 13, 14, 15)	

Housing Trajectory Findings

As noted above the detailed trajectory is appended to this report. The trajectory is organised as a spreadsheet and comprises multiple linked tabs/worksheets as follows:

Table 6 – Trajectory Structure

Tab Name	Description
Notes & Guidance	Guidance on how to read the trajectory – to be added
Trajectory	Headline outputs. Requirement and Completion figure are recorded as both discrete annual outputs and as cumulative figures. The variance between completions and requirement is recorded. A rolling requirement balance adjusted to account for completions (actual and predicated) is also presented. Charts show the distribution of any variance over the plan period
Conventional Completions (Small Sites)	Scheme level completion details covering years 2019/20, 2020/21, 2021/22 & 2022/23. Details not yet added. Revert to aggregated 'Completion Totals'
Conventional Completions (Large Sites)	Scheme level completion details covering years 2019/20, 2020/21, 2021/22 & 2022/23. Details not yet added. Revert to aggregated 'Completion Totals'
Conventional Completions (NSC)	Scheme level completion details covering years 2019/20, 2020/21, 2021/22 & 2022/23. Details not yet added. Revert to aggregated 'Completion Totals'
Completion Totals	Aggregated completion totals covering 2019/20, 2020/21, 2021/22 & 2022/23
Projections Summary Tab	Projected completions by year broken down by source type.
Conventional Pipeline (Large)	Permitted conventional capacity yet to be completed. Scheme level details where some or all of the residential capacity remains to be completed. Application sites are 0.25ha or larger. Sites smaller than 0.25ha are only included where these overlap large allocations to and an appropriate adjustment is made to the allocation capacity estimate to avoid double counting the potential yield of the site. 'To be completed capacity' assigned to future years.
NSC Pipeline	Permitted non-conventional capacity yet to be completed
Conventional Pending (Large)	Large site applications with residential component pending consideration or awaiting legal agreement.
NSC Pending	Schemes with a non-conventional component pending consideration or awaiting legal agreement
Conventional Allocations (Large)	Allocations meeting the large sites threshold with a residential component proposed. Capacity estimates adjusted to account for units previously completed within the site or where benefitting from a relevant extant or pending permission which has fed into the pipeline/pending tabs.
NSC Allocations	Allocations proposing a non-conventional component.
Conventional Windfall	Projected capacity anticipated to be delivered from large windfall sites/areas
Conventional Small Sites	Fixed small sites input.

Tab Name	Description
Phasing Assumptions	Indicative phasing assumptions guiding distribution of capacity over the plan period.

In the full trajectory only sites which already benefit from a permission and are part of the pipeline are identifiable by name. Whilst all other sites and their capacity are listed separately, they are intentionally 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, and this information is not published so as to not prejudice the formal planning application process. The site estimates whilst informed are nonetheless indicative representing one possible outcome for a given site, and so the utility of these outputs is most useful when interpreted at an aggregated level.

Table 7 below records key headline outputs from the trajectory at aggregated level (covering the whole plan period and the full LPA area)

Table 7 – Headline Trajectory Results at LPA level and for full trajectory period

Results	Net Units
Cumulative Requirement (19 years)	40,983
Cumulative Completions (delivered and projected)	47,937
Overall variance	+6,954

Figure 1 below shows annual completions by year. Figure 2 plots completions cumulatively against the cumulative requirement. Figure 3 illustrates projected capacity by site status/source. The tables and figures highlight that whilst by the end of the plan period completions are predicted to exceed the cumulative requirement figure (by +6,954 units), annual completions fall short of the annual requirement until 2024/25. This lack of capacity from completions and the approval pipeline during the initial period of the trajectory, is compensated during ('future') years 3-11 through an increased level of capacity identified from the allocations. As a cumulative measure the shortfall between completions and requirement is only closed in 2028/29, reflecting the time needed to close the gap arising from historical shortfalls. The timing of this is significant as whilst the London Plan target has been annualised for the purpose of creating this trajectory, the target itself is expressed as a ten-year target, and the results of this trajectory indicate that projected cumulative delivery will meet the 10-year requirement before the end of the London Plan target period in 2028/29. At present and largely reflecting site information held at present capacity is disproportionality distributed during 'future' years 6-10, as evident in figure 1 below. Many of the sites contributing to the bulk of this capacity during this period currently share the same planning status, and in the absence of further information there is little to distinguish between them in respect of factors which may influence our judgement around the timing of delivery. As time passes, and our knowledge around individual sites increases, this is likely to change and it is anticipated that some of this capacity will likely be pushed further into years 11-15. As a general observation this reduced supply of capacity during years 10-15 is not untypical for a trajectory of this type and represents a common weakness with the process, and such figures may not ultimately represent a true picture of the capacity that may eventually come forward during the latter part of the plan period, as it is challenging to comprehensively identify which sites might be available or suitable that far into the future.

Figure 1 – Annual Housing Completions by Year (Net)

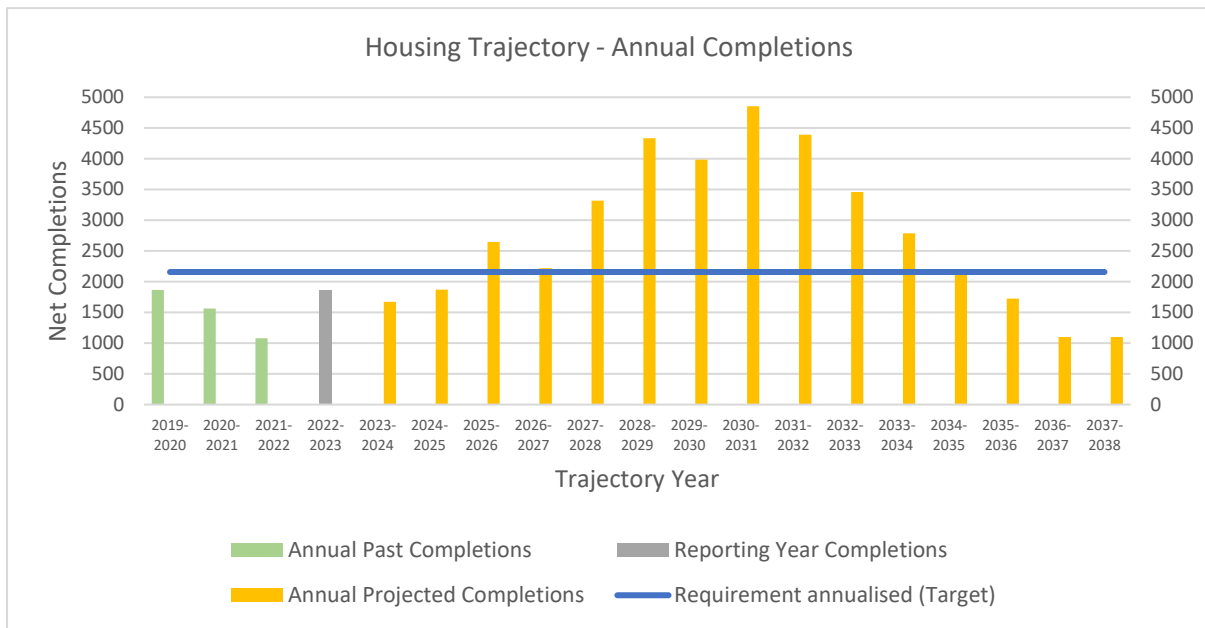


Figure 2 – Cumulative Housing Completions against requirement (Net)

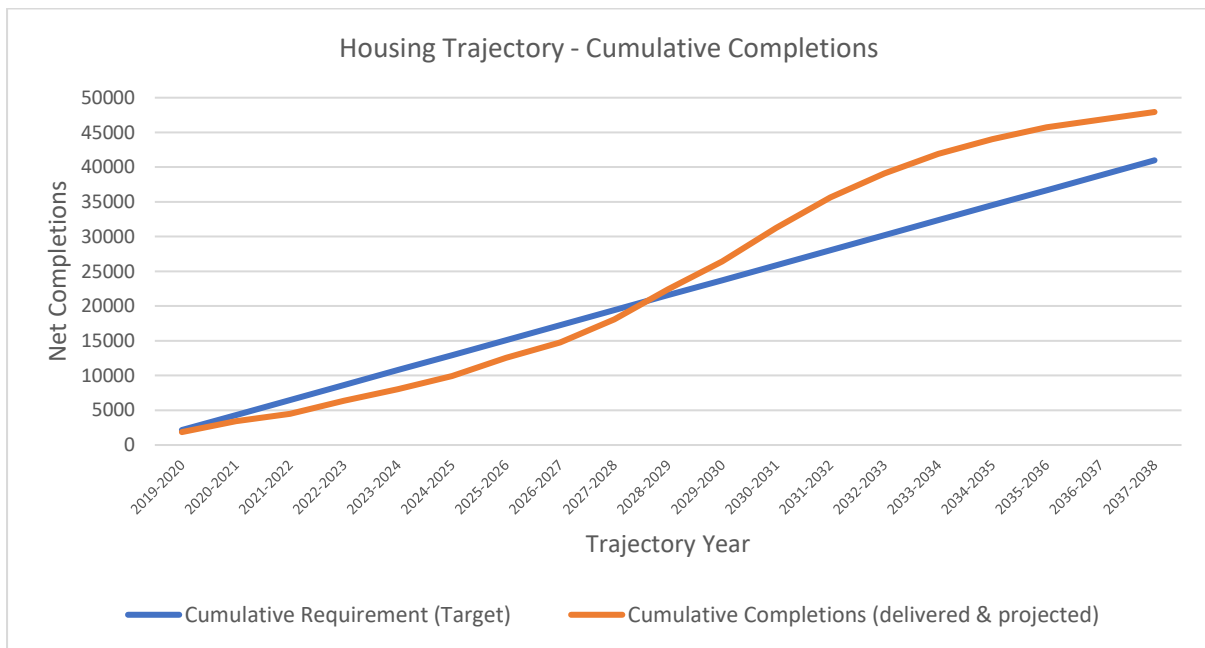


Figure 3 – Projected Completions by source

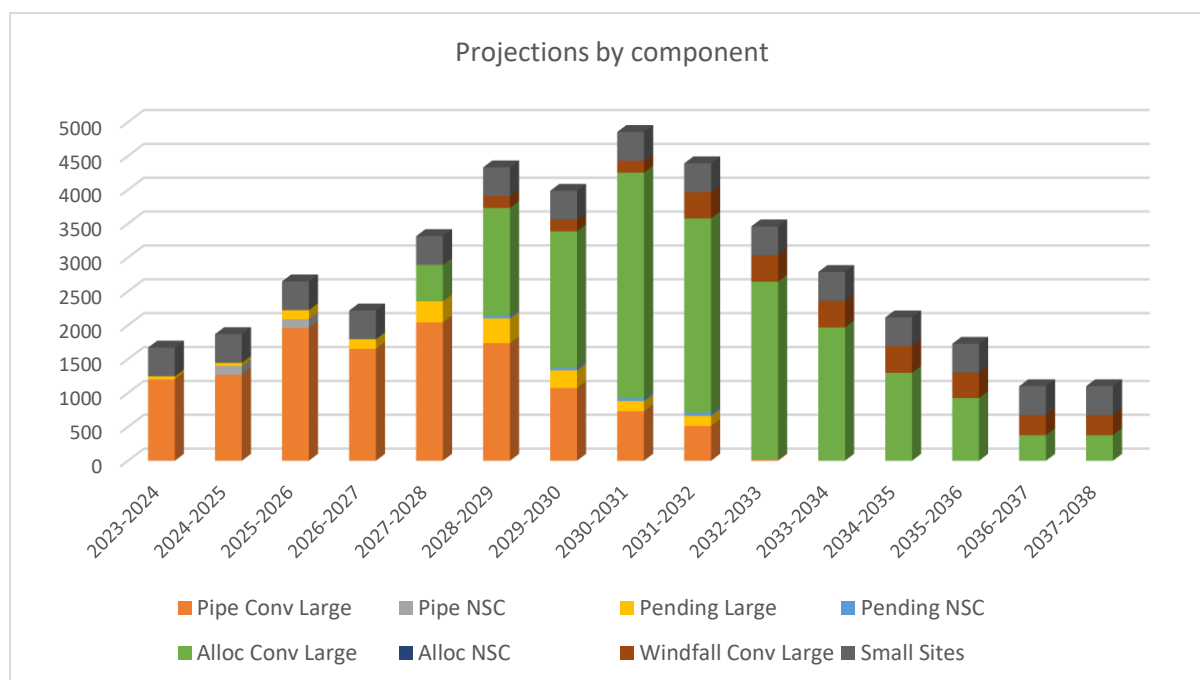


Table 8 details the cumulative completions by each of the seven towns. The small site component of these town-based figures has been determined through disaggregating the LPA total based on the spatial extent of each town as a proportion of the overall LPA area.

Table 8 – Spatial distribution of capacity by town over next 15 years

Town	Pipeline Conv Large	Pipeline NSC	Pending Conv Large	Pending NSC	Alloc Conv Large	Alloc NSC	Windfall Conv Large	Small Sites	Total Net Units
Acton	2338	0	185	0	3151	0	1871	750	8295
Ealing	584	260	717	173	3304	0	319	1560	6917
Greenford	1654	0	505	0	1887	0	0	915	4961
Hanwell	837	0	0	0	934	0	153	555	2479
Northolt	241	0	106	0	1295	0	0	915	2557
Perivale	278	0	0	0	335	0	0	495	1108
Southall	6263	0	96	0	7002	0	723	1170	15254
Total	12195	260	1609	173	17908	0	3066	6360	41571

Next Steps – maintaining the 5 YHLS and Trajectory

As noted above both the 5 YHLS position statement and housing trajectory should be viewed as live outputs. The datasets informing the trajectory are live changing with each permission given and every home built. Furthermore, work is still ongoing to improve the robustness and accuracy of the datasets used. As with the Regulation 18 consultation stage Regulation 19 also provides a further

opportunity to verify and validate site specific inputs and assumptions. It is anticipated that a further iteration of the 5 YHLS position statement and trajectory will be published before the Local Plan is submitted.

Where better or newer information becomes available it may also be appropriate to adjust aspects of the methodology or assumptions.

Appendix 1 – Detailed Trajectory

Excel Workbook supplied separately