Five Year Housing Land Supply Position Statement & Housing Trajectory

February 2025

Version 2

ECONOMY AND SUSTAINABILITY

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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 five years of the London Plan target period, a shortfall of 3,109 units is added to the baseline requirement figure. Applying a 20% buffer to both adds a further 2,779 units, giving an overall cumulative requirement of 16,673 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 10,296 units over the next five years. Utilising the current small sites figure in the London Plan a contribution of 2,120 units is added to this supply. A further contribution of 600 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 13,016 units.

- When measured against the cumulative requirement the identified supply equates to 78% of this total, with an absolute shortfall of 3,657 units. This equates to 3.9 years of supply.

- The Housing Trajectory which examines actual and projected delivery/supply over a longer 20 year period indicates that cumulative completions totalling 46,173 net units will exceed the cumulative requirement figure of 43,140 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 2025/26. This lack of capacity from completions and the approval pipeline during the initial period of the trajectory is offset during ('future') years 2-10 through an increased level of capacity identified from the allocations. As a cumulative measure the shortfall between completions and requirement is closed in 2029/30.

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.

A previous iteration of the position statement/trajectory was published in February 2024 alongside publication of the Regulation 19 plan, albeit dated November 2023.

This earlier version accounted for completion activity occurring up to 31st March 2023, and the period from the 1st April 2023 onwards was treated as being in the future for the purpose of this exercise. This latest iteration utilises the same framework but now accounts for completions occurring up to 31st March 2024, and moves the break between 'past' and 'future years' forward by a year.

It should be noted that this update references two iterations of the NPPF. In the context of plan-making, and reflecting the stage Ealing has reached in preparing a new Local Plan, the process outlined here is guided by the December 2023 version of the NPPF. In respect of decision-making the outputs detailed here should be interpreted against the December 2024 iteration of the NPPF.

The Council has also published an interim AMR in October 2021 which at the time 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 (December 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 December 2023) advises at para. 69 that strategic policy-making authorities 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 through their planning policies, taking into account their availability, suitability and likely economic viability, covering the periods as follows:

a) specific, deliverable sites for **five years following the intended date of adoption; and**
b) specific, developable sites or broad locations for growth, for the subsequent **years 6-10 and, where possible, for years 11-15 of the remaining plan period**.

Years 1-5

In respect of 'a)' above, the NPPF provides further clarity around this requirement, advising that local planning authorities should identify and update a supply of specific deliverable sites sufficient to provide a minimum a 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 process 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.

This process is relevant both to plan making and decision-taking, and the planning practice guidance details the significance to both including any differences in application.

In the context of plan-making it is necessary to demonstrate that the policies of the emerging plan identify a sufficient supply of deliverable sites for five years following the intended date of the adoption of that plan.

As well as confirming this position from the outset of the plan period, to support the preparation of a new Local Plan, the NPPF also requires authorities to monitor and maintain this supply beyond the base year of the plan, and therefore there is a need to update the 5YHLS position regularly. This need to maintain a rolling five-year housing land supply is also key to ensure that 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 in response to an application or appeal. It is important to note that the provisions associated with maintaining and updating the supply position in the context of decision making are informed and interpreted against the December 2024 NPPF. The need to prepare annual updates also reflects the live status of the datasets employed in this process, with the position essentially changing with each permission given and every home built.

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 Ealing's 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 inform the measure of performance against targets, the allocation of sites and the overall spatial strategy.

How it can be demonstrated

In plan-making it is expected that the strategic policies of the local plan will identify a 5-year housing land supply.

For the purposes of decision-taking paragraph 4 of the National Planning Practice Guidance ('Housing Supply and Delivery') advises that an authority can demonstrate a 5-year land supply when dealing with applications and appeals through, 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).

This position statement and future updates is intended to provide the evidence around supply needed to underpin the emerging Local Plan and essentially functions as a supplement to the Authority Monitoring Report. To support the preparation of the emerging Local Plan it is anticipated that at least one further update of this position statement will be prepared in Autumn 2025 following the verification of completion data for 2024/25.

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 (para. 005) 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.

Pending the adoption of Ealing's emerging Local Plan, the most recent adopted Local Plan which established a local housing requirement is Ealing's 2012 Core Strategy. As the Core Strategy has reached its fifth anniversary in 2017, it is no longer deemed current for the purpose of this exercise.

The target contained in the Core Strategy was in any event 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 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 from which completion figures have been confirmed. Ordinarily these completion figures are based off

the Government's published Housing Delivery Test results, the latest of which were published in December 2024 and cover activity up to and including 2022/23 only. To advance our understanding of the supply position it has been deemed appropriate to utilise more recent completion figures for 2023/24 submitted to Government as part of the Housing Flow Reconciliation (HFR) return. Typically the HFR forms the basis of the HDT results, and differences tend to be negligible. Utilising reported completion data for 2023/24, a revised 'starting year' of 2024/25 has been employed for the purpose of establishing this five year supply position.

B – Shortfall/Surplus

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

At the time of writing, completions data is available up to and including 2023/24, and therefore any shortfall is determined examining activity over 5 reported years as detailed in table 1 below. As noted above the completion figures given for 2019/20 to 2022/23 are taken from the published HDT results, with the figure for 2023/24 being sourced from our HFR return.

Table 1 – Net completions performance by year

Reported Year	Net Completions	Difference against target
2019/20 (base date)	1863	-294
2020/21	1994	-163
2021/22	1079	-1078
2022/23	1774	-383
2023/24	966	-1191
Cumulative Total	**7676**	**-3109**

C – Buffer

To ensure that there is a reasonable prospect of achieving the planned level of housing supply 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 choice of buffer levels and their application has continued to evolve between each iteration of the NPPF.

The December 2023 NPPF requires the application of a 20% buffer in circumstances where the delivery of housing taken as a whole over the previous 3 years has fallen below 85% of the housing requirement, as set out in the last published Housing Delivery Test results.

The December 2024 NPPF introduces two additional buffer levels (5% and a separate deferred 20% level linked to housing need), although neither apply currently in Ealing in the context of plan making, and both are in any event effectively overtaken by the 20% requirement arising from underdelivery as measured through the HDT.

As noted above the latest published Housing Delivery Test results (the 2023 measurement) were issued in December 2024, examining activity over the financial years 2020/21, 2021/22 and 2022/23. The results for 2023 are detailed below:

Table 2 – 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	1994	1079	1774	4847	84%

Based on the latest published results then delivery has fallen below 85% of the requirement, and therefore a 20% buffer is triggered. Whilst the 2024 HDT results are still pending, which will examine completion activity up to and including 2023/24, based on the HFR return for 23/24 it is reasonable to assume that the delivery will continue to fall below 85% triggering a 20% buffer going forward as well.

It should be noted that the requirement figure (1,436) for 2020/21 in table 2 above is an adjusted figure accounting for the national lockdown and is relevant only to these HDT results and is not carried over into the 5YHLS or trajectory requirement calculations.

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 2024/25 – 2028/29 (or 1st April 2024 until 31st March 2029). This updates the position statement published in Feb 2024 which established the supply position for 2023/24 – 2027/28. For future calculations this window of time will continue to 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 against a unit based target 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, 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 the next 5 years.

iii) Conventional capacity from sites with pending decisions, where compelling evidence exists to confirm that delivery will occur in the next 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 outlined in the London Plan (para. 4.1.9) 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

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

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

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

5 YHLS Findings

Table 3 – 5YHLS Summary Position

Component	Units
A – Basic Housing Requirement	10,785
B – Shortfall	3,109
C – Buffer at 20%	2,779
HR – Cumulative Requirement	16,673
D – Large Site Supply	10,296
E – Small Site Supply	2,120
F – NSC Supply	600
TS – Total Supply	13,016
Percentage Performance	78%
Supply in Years	3.9

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 five years of the plan target period, a shortfall of 3,109 units is added to the baseline requirement figure. Applying a 20% buffer to both adds a further 2,779 units, giving an overall cumulative requirement of 16,673 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 10,296 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 600 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 13,016 net units.

When measured against the cumulative requirement the identified supply equates to 78%, with an absolute shortfall of 3,657 units. This equates to 3.9 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 20-year period, examining/forecasting activity between 2019/20 and 2038/39. The period between 2019/20 and 2023/24 is now informed by historical completion datasets. The 15 year period from 2024/25 to 2038/39 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 – 2038/39. 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 an initial 5 year period covering 2019/20 – 2023/24.

Future delivery

For 'future years', which for this iteration of the trajectory covers the period from 2024/25 until 2038/39, 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, or in combination.

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

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. For this reason in order to establish the totality of any future delivery on a given allocation site it may be necessary to combine capacity figures from

multiple rows across multiple tabs. Emerging allocations smaller than 0.25 ha are also stripped out / 'zero'd 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 yet been identified or nominated, and therefore it is not possible to apply the standard capacity calculator. This is considered to be consistent with the NPPF's position around allowing the inclusion of broad locations as part of the latter period of a housing trajectory. At present this input captures the potential contribution arising from LSIS sites based on the application of a mixed intensification approach. Reflecting various unknowns, modest 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).

<u>Assigning capacity to future years</u>

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

For the next five forecast years (2024/25 – 2028/29) 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 (2029/30 – 2038/39) 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 beyond the next five years 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
- Confirmation of the relevant funding
- 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 future 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. In a limited number of cases, and informed by scheme specific information, only a portion of the total capacity has been assigned to the trajectory period, with the remaining unassigned capacity being assumed to be delivered after 2038/39.

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 4.

Table 4 – Phasing Assumptions

Scenario	Planning activity status	Site Status	Suggested Period	Suggested Phasing in Trajectory	Notes
1	Completed	Site completed by 31 March 2024	Reporting Year (Year 0)	Completions between 1 April 2023 and 31 March 2024 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 2024	Years 1-5	100% completed in year 1	These phasing assumptions can be tweaked if necessary to ensure supply looks reasonably spread across
3		Sites of 10-100 new residential units under construction at 31 March 2024	Years 1-5	Split 50% in year 1, 50% in year 2	

Scenario	Planning activity status	Site Status	Suggested Period	Suggested Phasing in Trajectory	Notes
4		Sites of 100-250 new residential units under construction at 31 March 2024	Years 1-5	Split 33% in year 1, 33% in year 2 and 34% in year 3	each of the first 5 years.
5		Sites of 250-500 new residential units under construction at 31 March 2024	Years 1-5	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 2024	Years 1-5	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 2024	Years 1-5	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 2024	Years 1-5	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 unless evidence suggests otherwise.
9		Sites of 100-250 new residential units not started at 31 March 2024	Years 1-5	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 permission can be included within first 5 years unless evidence suggests otherwise.
10		Sites of 250-500 new residential units not started at 31 March 2024	Years 1-10	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

Scenario	Planning activity status	Site Status	Suggested Period	Suggested Phasing in Trajectory	Notes
					included within first 5 years unless evidence suggests otherwise.
11		Sites of 500+ new residential units not started at 31 March 2024	Years 1-10	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 unless evidence suggests otherwise.
12	Outline Planning Permission or S106 pending (with resolution to grant)	Sites <10 new residential units not started at 31 March 2024	Years 1-10	Suggest phasing straddles 5 year periods (years 5-6)	
13		Sites of 10-100 new residential units not started at 31 March 2024	Years 6-10	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 1-5 if there is clear evidence that housing completions will begin on site within five years
14		Sites of 100-250 new residential units not started at 31 March 2024	Years 6-10	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 1-5 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 2024	Years 6-10	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 1-5 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 1-5.
16		Sites of 500+ new residential units not started at 31 March 2024	Years 6-10	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 1-5 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 1-5.
17	Pending consideration (i.e. without resolution to grant)	Sites <10 new residential units not started or permitted at 31 March 2024	Years 6-10	100% completed in year 6	Can be included in 1-5 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 or permitted at 31 March 2024	Years 6-10	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 1-5 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 or permitted at 31 March 2024	Years 6-10	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 or permitted at 31 March 2024	Years 6-10	Split over 6-10 year period (i.e. S106 close to being signed). Suggested build out period 4 years (years7, 8, 9 & 10).	
21		Sites of 500+ new residential units not started or permitted at 31 March 2024	Years 6-15	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, permitted or submitted at 31 March 2024	Years 6-10	50% completed in year 6, 50% in year 7	
23		Sites of 10-100 new residential units not started, permitted or submitted at 31 March 2024	Years 6-10	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	
24		Sites of 100-250 new residential units not started, permitted or submitted at 31 March 2024	Years 6-10	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, permitted or submitted at 31 March 2024	Years 6-10	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	Years 6-15	Split over 7-11 year period (i.e. S106 close to	

Scenario	Planning activity status	Site Status	Suggested Period	Suggested Phasing in Trajectory	Notes
		started, permitted or submitted at 31 March 2024		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, permitted or submitted at 31 March 2024	Years 6-10	50% completed in year 7, 50% completed in year 8	
28		Sites of 10-100 new residential units not started, permitted or submitted at 31 March 2024	Years 6-10	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, permitted or submitted at 31 March 2024	Years 6-15	Spread out over 4 years (years 8, 9, 10 & 11).	
30		Sites of 250-500 new residential units not started, permitted or submitted at 31 March 2024	Years 6-15	Spread over 5 (years 8, 9, 10, 11 & 12)..	
31		Sites of 500+ new residential units not started, permitted or submitted at 31 March 2024	Years 6-15	Spread over 6 years (years 8, 9, 10, 11, 12, 13).	
32	Windfall Masterplan Large	Sites <10 new residential units not started at 31 March 2024	Years 6-15	Spread over 4 year period (9, 10, 11 & 12)	
33		Sites of 10-100 new residential units not started at 31 March 2024	Years 6-15	Spread over 4 year period (9, 10, 11 & 12)	
34		Sites of 100-250 new residential units not started at 31 March 2024	Years 6-15	Spread out over 5 years (years (9, 10, 11, 12 & 13)	
35		Sites of 250-500 new residential units not started at 31 March 2024	Years 6-15	Spread over 7 years (years 9, 10, 11, 12, 13, 14, 15)	
36		Sites of 500+ new residential units not started at 31 March 2024	Years 6-15	Spread over 7 years (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 5 – 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 predicted) 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 & 2023/24. Scheme level 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 & 2023/24. Scheme level detail 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 & 2023/24. Scheme level detail not yet added. Revert to aggregated 'Completion Totals'
Completion Totals	Aggregated completion totals covering 2019/20, 2020/21, 2021/22, 2022/23 & 2023/24
Projections Summary Tab	Projected completions by year broken down by source type.
Conventional Pipeline (Large)	Permitted conventional capacity yet to be completed. Only capacity permitted up to the 31st March 2024 is included. Application sites are 0.25ha or larger. Sites smaller than 0.25ha are only included where these overlap large allocations 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. Only capacity permitted up to the 31st March 2024 is included.
Conventional Pending (Large)	Large site applications with residential component pending consideration or awaiting legal agreement. The pending tab only includes schemes lodged and validated up to the 31st March 2024. This tab may also include schemes where a decision was issued after 1st April 2024, and for which it was considered premature to move these schemes to the Pipeline in this iteration of the trajectory.
NSC Pending	Schemes with a non-conventional component pending consideration or awaiting legal agreement. The pending tab only includes schemes lodged and validated up to the 31st March 2024. This tab may also include schemes where a decision was issued after 1st April 2024.
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 separately 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.
Capacity Tool Template	Capacity assessment tool used to calculate potential capacity for select allocation sites.
Town Breakdown	Projected completions split by seven towns.

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

Table 6 – Headline Trajectory Results at LPA level and for full trajectory period

Results	Net Units
Cumulative Requirement (20 years)	43,140
Cumulative Completions (delivered and projected)	46,173
Overall variance	+3,033

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 +3,033 units), annual completions fall short of the annual requirement until 2025/26. This lack of capacity from completions and the approval pipeline during the initial period of the trajectory, is compensated during ('future') years 2-10 through an increased level of capacity identified from the allocations. As a cumulative measure the shortfall between completions and requirement is only closed in 2029/30, 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 reach the 10-year requirement very shortly after the end of the London Plan target period in 2028/29. At present, and largely reflecting site information held currently, capacity is disproportionality distributed during 'future' years 5-9, 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 the reduced supply of capacity during years 11-15 is not untypical for a trajectory of this type and represents a common limitation with the process, and such figures may not ultimately represent a true picture of the capacity that may eventually be

realised 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)

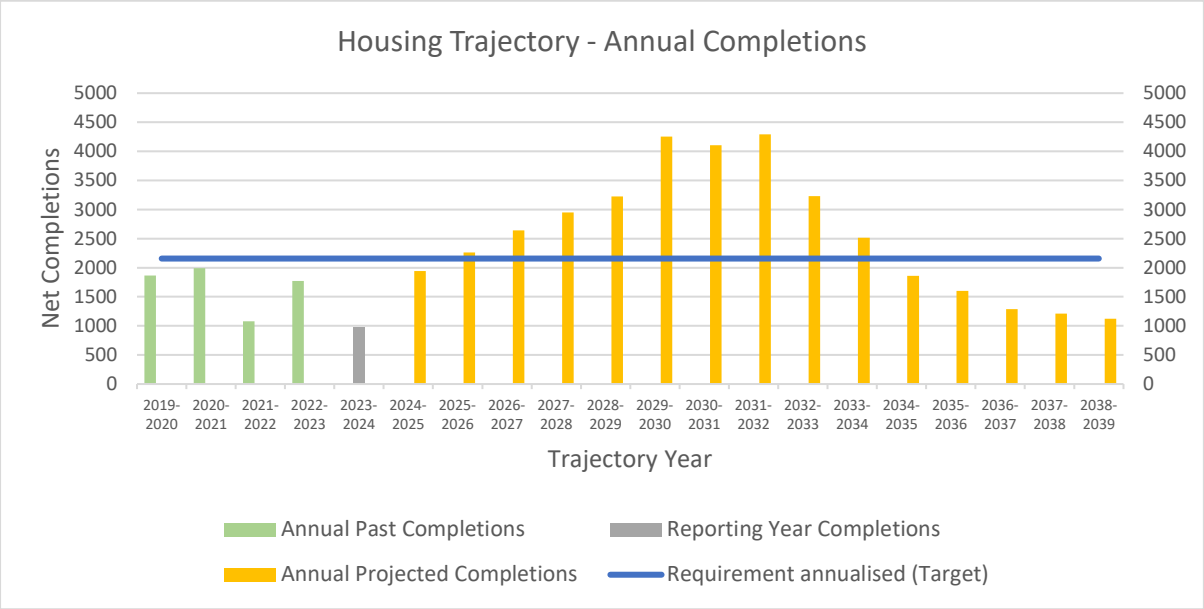

Figure 2 – Cumulative Housing Completions against requirement (Net)

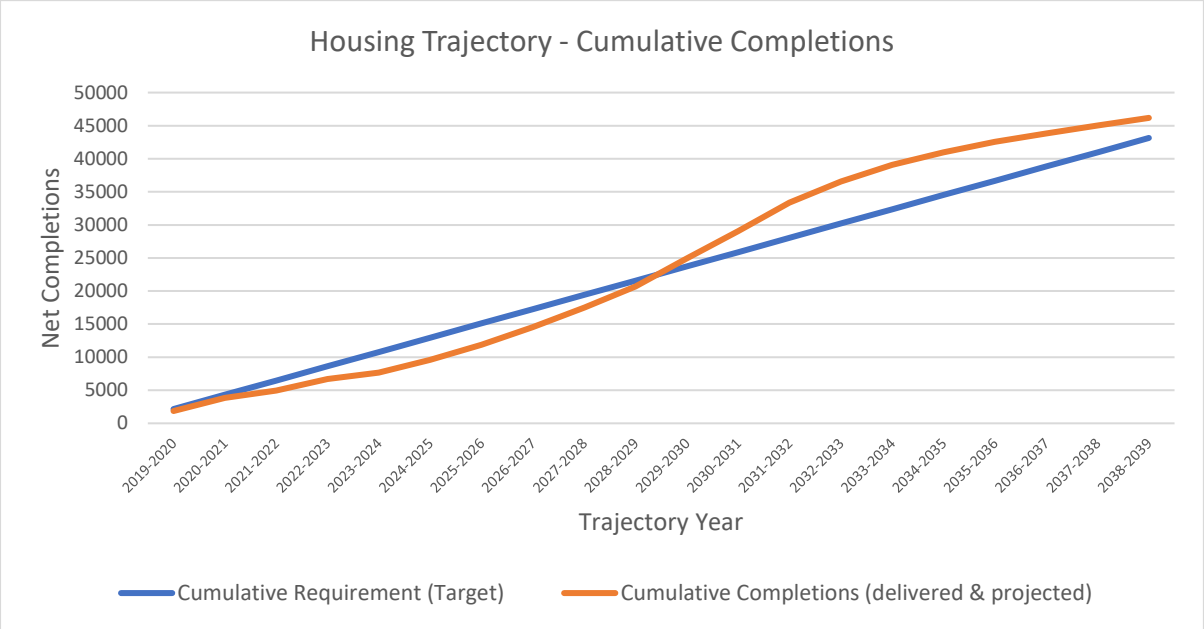

Figure 3 – Projected Completions by source

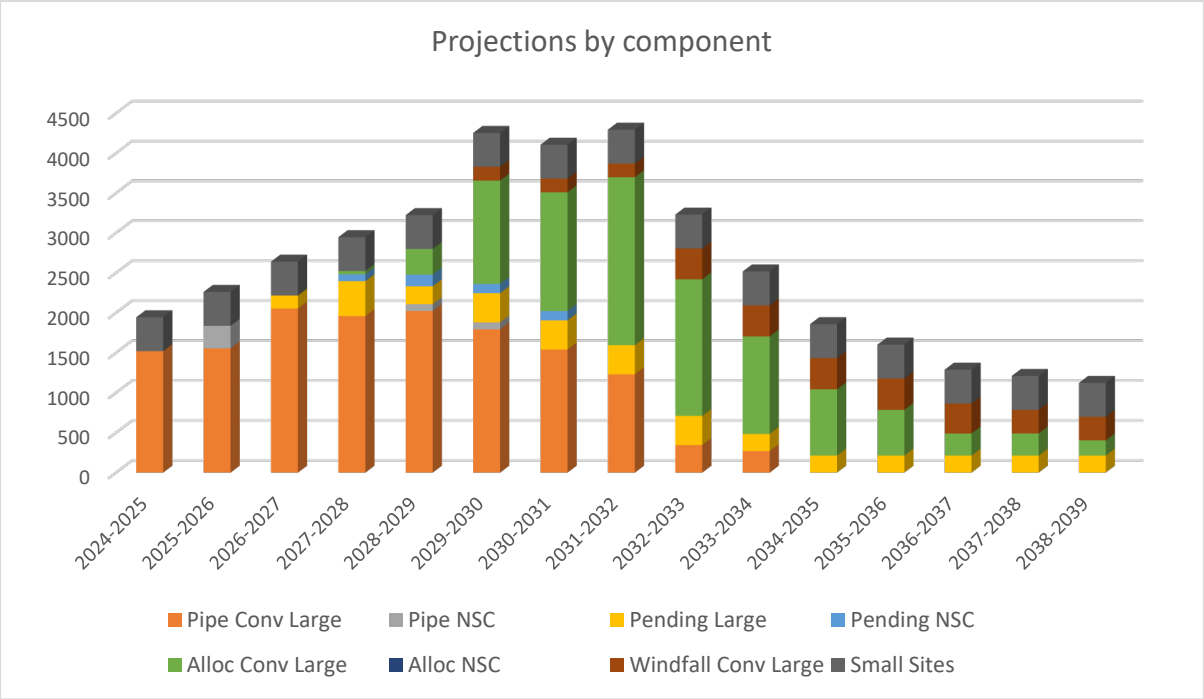

Table 7 details the cumulative completions by each of the seven towns. The small site component of these town-based figures has been determined through disaggregating the LPA total based on the spatial extent of each town as a proportion of the overall LPA area.

Table 7 – Spatial distribution of capacity by town over next 15 years

Town	Pipeline Conventional Large	Pipeline NSC	Pending Conventional Large	Pending NSC	Allocations Conventional Large	Allocations NSC	Windfall Conventional Large	Small Sites	Total Net Units
Acton	2499	0	95	214	1504	0	1844	750	**6906**
Ealing	531	455	721	252	2423	0	319	1560	**6261**
Greenford	1654	0	505	0	1541	0	0	915	**4615**
Hanwell	837	0	0	0	919	0	153	555	**2464**
Northolt	92	0	106	0	1086	0	0	915	**2199**
Perivale	278	0	0	0	335	0	0	495	**1108**
Southall	8396	0	2140	0	2515	0	723	1170	**14944**
Total	**14287**	**455**	**3567**	**466**	**10323**	**0**	**3039**	**6360**	**38497**

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. It is anticipated that a further iteration of the 5 YHLS position statement and trajectory will be published once the 2024/25 completion figures have been confirmed in Autumn 2025.

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