

Ealing LPA Local Plan (Regulation 24) 2025

Matter 4: Housing

Issue [Focus – Policies SP4, HOU, H16, SSC]:

Whether the Plan has been positively prepared and whether it is justified, based on up-to-date and reliable evidence, effective, consistent with national policy and in general conformity with the London Plan in relation to housing development management policies.

Written Statement on Behalf of Ealing Council

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Questions:

Housing – general:

1. Does the Plan accurately and clearly set out a housing target that reflects the ten-year targets for net housing completions referred to a Policy H1(A) of the London Plan? Is the approach to setting the housing target after 2028/29 justified?

LPA Response: Ealing's local housing evidence in respect of need and supply support the use of the London Plan targets as detailed in Policy H1(A) in establishing the planned level of growth expected via Ealing's Local Plan.

Specifically strategic Policy SP4.3 of the Local Plan establishes the requirement to meet the 21,570 unit 10-year housing supply target for the period 2019/20 to 2028/29.

Acknowledging that the life of the local plan extends beyond 2028/29, consideration has also had to be given to what target should be employed for the latter period of the plan. To this end regard has been had to the guidance contained in London Plan Policy H1, and specifically the supporting text at Paragraph 4.1.11. This states that if a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.

There is some logic to this approach suggested here, given that the capacity identified in the SHLAA for the '10-year period' (phases 2 and 3) is the primary determinant of the target, it therefore should follow that capacity identified for later phasing periods would provide a sound basis for setting targets for later periods. There are however also some limitations with this approach. Arising from the default phasing assumptions employed by the GLA in the SHLAA, there is an uneven distribution of capacity across the SHLAA period, with the bulk of it being attributed to SHLAA phases 2 and 3. In Ealing's case 74% of the overall capacity identified in the SHLAA has been assigned to phases 2 and 3 despite only relating to 42% of the overall time period covered by the SHLAA. SHLAA Phases 4 and 5 account for only 12% and 4% of the overall identified capacity respectively despite covering a longer 12-year period. Whilst it is recognised that the SHLAA findings are intended to provide a foundation for this work, and this may be supplemented by additional evidence, the significance of the SHLAA input relative to other factors evidently diminishes over time. Were the council to follow the London Plan approach and model targets based off the SHLAA results for the later periods, it would look to establish an initial 'base' target in the region of 1,000 units per annum. Clearly this represents a significant reduction relative to the 10-year target (2,157 - annualised) and the recent delivery levels, and therefore it may not represent the best approach to establishing a target beyond 2029. Pending the completion of a new pan London SHLAA, which will inform future strategic supply targets, the Council has chosen to roll forward an annualised form of the London Plan target. Local Plan Policy SP4.3 confirms this intention, advising that an annual target of 2,157 units is established for the rest of the plan period.

2. When read in conjunction with the wider development plan, is the submitted Plan clear about where residential development in the Borough will be supported in principle, including small sites?

LPA Response: Yes, Ealing LPA's Local Plan is intended to support residential development in principle in all locations in which it is not expressly prohibited by policy. As set out in the Character Study [EB42] residential is the predominant land use in the Borough, and Ealing forms a residential environment with mixed and supporting uses. Primary exceptions to this are protected greenspace and designated industrial land, which are both subject to the strongest protections in the plan. Residential uses are therefore generally acceptable other than in protected land and are subject to design and other constraints.

3. Is the spatial distribution of housing development across the Borough justified and informed by the IIA?

LPA Response: Yes. The spatial distribution of the housing reflects the strategic policies of the Local Plan which has been underpinned by a growth strategy. This growth strategy has been developed following the consideration of reasonable alternative spatial options (see Preferred Options Report - EB106).

Three alternative spatial options for growth were identified as follows:

- Option 1: Strategic Corridor Focus – which reinforces the historic pattern of housing growth along east-west corridors
- Option 2: Network Connectivity Focus – which reinforces growth around the east-corridors whilst also maximising opportunities for growth around improved north-south connectivity
- Option 3: Neighbourhood Centre Focus – which promotes polycentric housing growth across Ealing's centres, with growth being distributed more evenly across the borough.

The IIA assessment considered the potential environmental, social and economic effects of each Spatial Option and made recommendations. These recommendations and findings of the IIA process have directly led to the development of a preferred option (Option 4), which essentially combines elements of all three of the original spatial options. Under this option housing growth is distributed more equitably across the seven towns, with a focus still remaining along the transport corridors.

Table 7 of the Five-Year Housing Land Supply and Housing Trajectory Position Statement (EB73) details the anticipated spatial distribution of future housing supply across each of the seven towns. Whilst this shows that the largest numbers continue to be focused in Southall and then Acton and Ealing, in part this reflects the pre-established housing pipeline, which has been secured under the current adopted Local Plan. Over the lifetime of the plan, the distribution of growth is anticipated to become more evenly distributed, supported by the increased spread of allocations across the seven towns relative to earlier Local Plans. This is the first Local Plan for example which identifies allocations within Northolt and Perivale. The trajectory also reflects the increased role of small sites.

4. Paying regard to paragraph 63 of the NPPF, is the size, type and tenure of housing needed for different groups in the community assessed and reflected in the planning policies?

LPA Response: The requirements of NPPF paragraph 63 were assessed by the Local Housing Needs Assessment [EB 76] were assessed as the then paragraph 61 in the 2019 NPPF.

This is substantially the same in its requirements as Paragraph 63 of the December 2024 framework but does not explicitly include looked after children. However, the requirements of

looked after children are addressed by the Ealing's housing and social care services rather than through specific local plan development targets.

Affordable Housing:

5. In terms of Policy HOU:

a. what is the background to the policy and the evidence justifying it, including specific detailed thresholds?

LPA Response: Policy HOU {S1} provides a single, coherent policy that sets out affordable housing requirements in Ealing. In doing so it draws together elements that are otherwise split across different London Plan policies, primarily H4-H6. In consequence, it is not a direct variation of those policies and forms a local policy of its own.

The evidence supporting Policy HOU is set out in the Local Housing Needs Assessment (LHNA) and its previous iterations [EB 76, 78 & 79]. The LHNA sets out a strategic need of between 55% and 66% which supports London Plan target of 50%, and a tenure split of 70% social rented to 30% intermediate which complies with the range of options available to the boroughs in London Plan Policy H6.

The LHNA also sets out needs for non-conventional housing supply such as Large-scale Purpose-built Shared Living.

b. how does the policy support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable in Policies CG4 and H4 of the London Plan?

LPA Response: The strategic target of 50% provision set by the London Plan {EB13} has always exceeded the threshold approach set by that Plan, with the expectation that the gap would be closed to some extent by higher contributions from housing development on public and industrial land, and through supplementary housing grant and strategic partnerships.

Affordable needs in Ealing as set out by the LHNA in fact exceed even this strategic target with between 55% and 66% affordable needs depending on policy expectations about acceptable tenure and household formation.

Ealing's LHNA update is comprehensive in its policy analysis and its assessed needs should be taken as a measure of genuine affordable needs.

The approach of Ealing LPA's Local Plan is therefore two-fold:

- to increase the total provision of affordable housing as a percentage of total housing supply; and,
- to ensure that the size and tenure of these affordable units matches identified needs.

The increase in affordable provision will be achieved through an increase in the threshold from 35% to 40%, and also through the small sites levy set out in Policy SSC.

Size and tenure requirements are set out directly in relation to the current evidence of needs and will be quantified in local guidance to ensure that these are always up to date. Focussing delivery upon identified needs is particularly important because there have been historical mismatches between need and delivery.

Ealing LPA Policies HOU and SSC {S1} therefore meet or exceed the requirements of London Plan {EB13} Policies GG4 and H4 in focussing delivery upon identified needs and in the level of contribution that is sought.

NB please note that the question refers to London Plan Policy CG4 which is a typographical error and should read GG4.

c. is the interaction with Policy H5 of the London Plan clear in terms of setting out the instances where an affordable housing contribution will be sought? Paying regard to Policy H5(B)(2) and (3) is modification needed to clarify the position in relation to public sector and industrial land?

LPA Response: Yes. It is suggested that to ensure better clarity a suggested modification is made to the supporting text at Para 5.16 {S1} with the insertion of a new sentence (in ***bold italics***) as follows:

“5.16 Like most London boroughs, Ealing faces an acute affordable housing need, particularly for social rent homes. Part A sets out a strategic target of achieving 50%, consistent with the London Plan. A higher threshold to that in Policy H5 B 1) in the London Plan is set out in Part C to better address the borough’s identified need. ***The threshold for H5 B 2 & 3 is unaltered from that set out in the London Plan.*** The tenure split of 70% social rent and 30% intermediate accommodation is consistent with the requirements of the London Plan and applies to the relevant thresholds for each site (either 40% or 50%). Given the identified need for social rent accommodation this tenure split also applies to Build to Rent schemes.”

d. are the identified needs in Ealing referred to in HOU(A) clear? If identified needs are set out elsewhere in the evidence base and in guidance, should they be repeating in the Plan for effectiveness?

LPA Response: The policy is clear that identified needs are those set out in local housing evidence, in the SHMA and now LHNA. These documents have historically been directly referenced both in pre-application discussions and in decisions and also have a refresh rate that is more frequent than the update cycle of the local plan. For this reason, while the strategic target (50%) and tenure split (70:30) are set out in the policy, size mix and specialist housing needs are considered to be better set in guidance that can be updated to reflect changing evidence of need.

e. does HOU(B) repeat the requirement in HOU(A) and, if so, why is HOU(B) necessary?

LPA Response: Yes, this is an error. Policy HOU A (iii) was originally intended to form a separate limb B to reflect that it would be set through guidance whereas A (i) and (ii) were defined in policy. A (iii) is therefore unnecessary. It is therefore proposed that this forms a suggested modification for the purposes of providing better clarity.

f. are the expectations in terms of mix and tenure clear? Is the interaction with Policies H6 and H10 of the London Plan clear?

LPA Response: Detailed mix and tenure follow from the relevant LHNA and are intended to follow in guidance as set out above.

Policy HOU was written as a separate local policy to reflect that it sits independently from the London Plan policies rather than following directly from one or other. The split of 70% social rent to 30% intermediate fits directly into the available range identified in Policy H6 and the general guidance in H10.

g. are the requirements in HOU(C), including any variance to Policy H5(B)(1) of the London Plan, justified? Has the deliverability of adopting the thresholds been appropriately considered, including the applicability of the requirements to Build to Rent developments?

LPA Response: This form of development has been considered by the whole plan viability assessment and found to be viable. Build to Rent has, if anything, superior viability to conventional housing and should make a contribution to the 70% of identified needs that are social rent.

h. how does the evidence demonstrate that the 40% threshold will be effective in maximising affordable housing provision in Ealing? What is the Council's response to the GLA's representation setting out their view on the differences in provision between schemes following the fast-track route versus viability tested schemes?

LPA Response: The GLA in its response conflates the data for all viability tested applications, which include those schemes that have genuine viability constraints, with that of schemes that meet the current threshold and may have capacity to provide more affordable units. Ealing LPA's Local Plan whole plan viability assessment finds the policy viable, and it is therefore both justified and viable. In practical terms, the Ealing's bespoke viability evidence is also a better guide as to the effect of the policy and suggests that while not all schemes will necessarily meet the threshold in the case of site-specific constraints, additional affordable provision will still be delivered.

i. in light of the stipulation in HOU(D) that provision should normally be made on site, is the Plan sufficiently clear on what would happen if a case was successfully made for off-site provision?

LPA Response: Off-site provision would have to be based upon some site-specific material consideration to the contrary of policy or viability constraints arising from the site. In calculating the value of the off-site contribution, the council has typically used estimated sales values with a review stage to balance this against actual sales values. The Affordable Housing London Plan Guidance also provides detail as to how offsite contributions should be tested and managed.

j. are the requirements in HOU(E) in relation in relation to large scale purpose built shared living developments justified)? Is a contribution in the form of conventional housing units on site deliverable in practice?

LPA Response: Bearing in mind that these schemes are to be justified on a case-by-case basis it is not unreasonable to set out a bespoke approach in policy. Burdens upon viability should be no greater than in any other scheme because each shared living unit is not counted as a full residential unit in calculating the affordable provision. Whole plan viability testing also shows superior margins for Large-scale Purpose-built Shared Living over conventional housing types.

In practice the main constraint will be potential differences in design for the conventional affordable units from the other units in the development and this can only be assessed in

relation to specific sites and proposals. The principal constraint upon onsite affordable provision is normally management of these units but the scale and nature of LSPBSL development means that onsite servicing will always be present, and usually to a greater extent than is the case with conventional C3 uses.

k. are the requirements in HOU(F) in relation to purpose-built student accommodation (PBSA) including any variance to Policy H15(4) of the London Plan justified? Has the deliverability of adopting the threshold been appropriately considered?

LPA Response: This form of development has been considered by the whole plan viability assessment and found to be viable.

l. are the first two paragraphs of 5.22 detailing how applications for PBSA will be treated reflected in policy? If not, is modification needed to remove the text for clarity?

LPA Response: This reflects the requirement in London Plan para 4.15.3 requiring a nomination agreement and follows from London Plan Policy H15 A 3.

m. is the policy in general conformity with the London Plan?

LPA Response: The policy is in general conformity with the London Plan. Its objectives are the same as the relevant London Plan policies, and it is designed specifically in service of the 50% strategic threshold set by the London Plan. The difference between Ealing and the GLA is based upon the estimations of the effect of the policy.

GLA has conflated the data for all viability tested applications, which include those schemes that have genuine viability constraints, with that of schemes that meet the current threshold and may have capacity to provide more affordable units. Ealing LPA's Local Plan whole plan viability assessment finds the policy viable, and it is therefore both justified and viable. In practical terms, the Ealing's bespoke viability evidence is also a better guide as to the effect of the policy and suggests that while not all schemes will necessarily meet the threshold in the case of site-specific constraints, additional affordable provision will still be delivered.

n. are any other modifications needed to Policy HOU for soundness?

LPA Response: No.

6. Does the Plan, and policies within it, support a positive and effective planning framework for managing development in Strategic Regeneration Areas?

LPA Response: Yes. The development of the Ealing LPA's Local Plan is closely aligned to the strategic vision and key priorities that are outlined in Ealing Council's Council Plan 2022- 26 {EB66}.

The Vision in Policy SP1 acknowledges the unique characteristics and cultural identities of each of Ealing's seven towns and that they should be respected and enhanced through the application of locally sensitive Good Growth principles. It also seeks to ensure that growth in Ealing is inclusive so that people can both contribute to and benefit from growth.

Policy SP3 aims to fight inequality. This recognises that there are parts of Ealing where the impacts of inequality and causes of deprivation are particularly concentrated. It seeks to reduce spatial inequalities within Ealing by, for example, promoting mixed and balanced communities

particularly in those areas of high levels of multiple deprivation and having a more fair and balanced approach to new development and investment, whereby all the seven towns will have a prominent role in accommodating growth, and as a result will benefit fairly from new investment.

This golden thread then underpins each of the seven Town Plans in Chapter 4 and provide a locally distinctive and relevant planning policy framework for each area.

Gypsies and Travellers and Travelling Showpeople:

7. Is the approach of the Local Plan to Gypsies and Travellers and Travelling Showpeople justified, consistent with national policy, positively prepared, effective and in general conformity with the London Plan, and:

LPA Response: The council believes it has taken a positive approach to addressing the needs of the borough's Gypsies and Travellers through the Plan by allocating a new site for six pitches to meet future accommodation needs up to 2041. The number of pitches meets the future accommodation needs as assessed in the West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (WLA GTAA) [EB80]. The site proposed for allocation, 09NO Kingdom Workshop, was selected following a rigorous assessment of potential sites in a report commissioned by the council in June 2023, 'Gypsy and Traveller pitch provision site assessment' [EB74] and a focused Regulation 18 consultation that ran from 5 July to 16 August 2023.

The approach of the Local Plan is consistent with national policy. The WLA GTAA 2018 used guidance from Planning Policy for Traveller Sites (PPTS) 2015 to assess future Gypsy and Traveller accommodation needs in Ealing. In addition to PPTS 2015, the Local Plan approach considered the Housing and Planning Act (2016), and will address additional need for households that do not meet the PPTS 2015 planning definition as part of general housing need, as all Travellers will have been included as part of the overall Objectively Assessed Need (OAN).

Ealing is part of the West London Alliance who commissioned the WLA GTAA 2018 as a joint evidence base document. Ealing officers attend West London Alliance meetings regularly to discuss cross boundary strategic matters and other planning policy issues, and to agree other joint working projects and plans. The council has had numerous bilateral meetings with neighbouring boroughs to discuss matters such as Gypsies and Travellers, and has agreed Statements of Common Ground with Brent, Harrow, Hounslow, Hillingdon and OPDC.

Hillingdon {S22i} has objected to the proposed Gypsy and Traveller site at Kingdom Workshop (09NO) on the grounds of it being located within Green Belt land. However, the site is currently occupied by an unconsented lorry repair business that has been operating for 20 years, and the council believes this constitutes previously developed, 'grey belt' land. The council intend to make an exceptional, limited alteration to the Green Belt to accommodate the site as an inset site to meet the specific identified need for a new traveller site, in line with PPTS 2015 and 2024 Policy E para. 17.

The Mayor of London has not raised any objections or conformity issues to the Plan's approach to Gypsies and Travellers. Ealing's Local Plan has taken account of London Plan Policy H14 Gypsy and Traveller Accommodation by planning to meet identified need for permanent Gypsy

and Traveller pitches up to 2041, using the most up to date needs assessment (EB80).

In light of the above, the council is therefore confident that the approach of the Local Plan to Gypsies and Travellers is justified, consistent with national policy, positively prepared, effective and in general conformity with the London Plan.

a. in terms of planning to meet the future housing needs, what is the implication, if any of relying upon the findings of primary research which predates the joint Gypsy and Traveller Needs Assessment undertaken in 2018 [EB80]? What subsequent work has been done during plan preparation to verify that the findings of that earlier primary research on future needs is still valid for the plan period?

LPA Response: The London Plan 2021 {EB13} based its Gypsy and Traveller accommodation Policy (H14) on the research and report conducted by Fordham Research in March 2008 entitled 'London Boroughs' Gypsy and Traveller Accommodation Needs Assessment'. The assessment covered London Boroughs' needs for Gypsy and Traveller pitches for the period 2007 – 2017, which is considered outdated for the purposes of the Ealing Local Plan that covers a 15-year period from 2024 - 2039.

London Plan (EB13) Policy H14 B states that boroughs that have not undertaken a needs assessment since 2008 should use the figure of need for gypsy and traveller accommodation provided in the London Plan at Table 4.4 until a needs assessment is undertaken as part of their Development Plan review process. Ealing, in conjunction with other West London Alliance boroughs, commissioned Opinion Research Services (ORS) to undertake a Gypsy and Traveller Needs Assessment in 2018 (WLA GTAA) [EB80] and based their findings using the definition of Travellers in Planning Policy for Traveller Sites (2015).

The WLA GTAA is the most up to date published research on the future housing needs for the Gypsy and Traveller community. Ealing's Local Plan responds to the findings of the later research study, rather than relying on the London Plan's very outdated research conducted in 2008, which is in line with London Plan {EB83} Policy H14 B. The research concluded that an additional six pitches were required to meet the future accommodation needs of the Gypsy and Traveller Community up to 2041.

To meet the future accommodation needs for Gypsies and Travellers identified in the ORS WLA GTAA, the council commissioned Three Dragons to identify and assess potential sites within the borough. Finding a new site to accommodate a future need for six pitches was considered essential as there is no opportunity to increase capacity at the currently highly constrained Traveller's site at Bashley Road to accommodate the additional need.

The Bashley Road Traveller community were consulted on at least three separate occasions to discuss their needs and preferences for a new Gypsy and Traveller site. Following a focused Regulation 18 consultation on Additional Site Allocations for Gypsy and Traveller Pitch Provision which ran from 5 July to 16 August 2023, a site in Northolt was identified to meet the need for six new pitches. The site was included as an allocation in the Local Plan Regulation 19 consultation - Kingdom Workshop (09NO).

The Gypsy and Traveller Pitch Provision Report (GTPP) [EB74] drew on the WLA GTAA as well as

national and regional planning policy guidance and was used to inform the development of Ealing LPA's Gypsy and Traveller policies and preferred site allocation in the draft Local Plan.

Given the above, the findings of the earlier primary research on future needs are considered outdated and the council has therefore relied on the findings of more recent research.

As stipulated in the London Plan {EB13} 2021, Para 4.14.2, the Mayor of London will lead a London wide gypsy and traveller accommodation needs that this will update their last study published in March 2008. Such a study has been commissioned, and the council has been consulted on its scope, methodology and initial findings. Initial results indicate that Ealing LPA's new need figure is for six new pitches, no different to the current assessed need figure. The London-wide GTAA is due to be published either sometime later this year or in early 2026 and will inform the new London Plan review, which according to the GLA is due to be consulted upon in 2026 and, subject to examination, adopted in early 2028. Once the new London Plan has been published, the council will seek to review its Local Plan and take account of any update in the accommodation needs of the Gypsy and Traveller community.

In the event that the findings of the London-wide GTAA indicate a higher number of pitches is needed to meet Ealing's Gypsy and Traveller accommodation needs, the council will look at some of the other sites assessed in the Three Dragons report to see if they can accommodate the additional pitches required. As many of the sites are owned by the council and in light of the government's changing view of Green Belt, within which many of the sites are located, officers are confident that future accommodation needs of the Traveller community can be met, and the council is committed to taking a pro-active stance.

b. does the Plan respond appropriately to the needs of Gypsies in view of the most recent Smith v Secretary of State judgement and the relevant Planning Policy for Traveller Sites?

LPA Response: The Smith v Secretary of State judgement was handed down in October 2022 and highlighted the need to address the needs of all Gypsies and Travellers, not just those who fit within a specific definition. This means that local planning authorities should not discriminate against Gypsies and Travellers based on their lifestyle or whether they travel frequently or not at all.

At the time of drafting the Ealing Local Plan, the relevant Planning Policy for Traveller Sites was the 2015 version, which had a narrower definition of the term Gypsy and Traveller, and was the one used by ORS in the 2018 West London Alliance Gypsy and Traveller Accommodation Needs Assessment (WLA GTAA).

Ealing LPA's Local Plan has made provision to meet the assessed future needs of the Gypsy and Traveller community based on the evidence presented in the WLA GTAA by allocating a site for six pitches in Northolt (09NO Kingdom Workshop).

The council commissioned consultants Three Dragons to identify a suitable site or sites to meet identified future need (Gypsy & Traveller pitch provision, site assessment, June 2023) [EB74]. The consultants, along with officers, made several visits to the existing Traveller site at Bashley Road to consult with the community and their representatives on their preferences for a new site, including the option for a new site to accommodate everyone from Bashley Road and additional pitches to meet future needs. The community were adamant that they did not wish to leave Bashley Road, however they understood a new site was needed to meet future need due

to the lack of opportunity to expand Bashley Road. The community and their representatives were active participants in the focused Regulation 18 public consultation that ran 5 July to 16 August 2023.

The community preference for the site at the Kingdom Workshop was a key component of the decision to allocate a new Gypsy and Traveller site in the Regulation 19 Local Plan consultation.

Ealing LPA's Local Plan also seeks to ensure that the needs of the Gypsy and Traveller community can be met in light of the Smith v Secretary of State judgement through Policy SP3: Fighting inequality - a commitment to promote mixed and balanced communities (SP3.1 A), creating a more equal borough by maximising opportunities to access good quality housing, employment, digital connectivity, culture, physical, social and green infrastructure (SP3. 1 B) and investing in a new purpose built and designed Gypsy, Roma and Traveller site to meet an identified future need of six additional pitches (SP3.1 D).

The council is committed to continuing working with the Mayor of London on updating the London-wide Gypsy and Traveller accommodation needs assessment and await the publication of the evidence base report. It will inform new LPA targets as part of the review of the London Plan. This will feed through into a revised need for gypsy and traveler pitches when the new London Plan is eventually published. The council intends to review the Local Plan, which will include updating any new identified need for Traveller pitches, and if necessary, find additional new sites to meet that need.

Additionally, Ealing Council's draft Housing Strategy and Delivery Plan, 2025 sets out a number of priorities including additional permanent pitches to meet assessed need and the establishment of a dedicated transit site for the Gypsy, Roma and Traveller community. The latter is intended to ensure the Traveller community is able to travel through the borough safely, with viable alternatives to unauthorised encampments on private land and open spaces. The Strategy also commits to reviewing and responding to new evidence on the needs of the Gypsy, Roma and Traveller community emerging from the review of the London Plan. In turn it will plan to meet any new identified need for transit and permanent sites following adoption of the next London Plan.

All the above measures ensure that the Ealing LPA's Local Plan responds appropriately to the needs of Ealing's Gypsy and Traveller community.

c. does the Plan respond to the needs of other members of the travelling community, including Travelling Show People and Boat People?

LPA Response: Yes, Ealing LPA's Local Plan policies are based on the evidence presented in the report West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment, 2018 (WLA GTAA) produced by Opinion Research Services (ORS) [EB80].

No Travelling Show People were identified in the WLA GTAA as needing additional accommodation. However, the report did not identify boat people as members of the wider travelling community or include them in their interviews and as such, did not provide any information on this specific group.

The Housing and Planning Act 2016, Section 124 Assessment of accommodation needs includes a duty for local housing authorities in England to consider the needs of people residing in or resorting to their district with respect to provision of:

- sites on which caravans can be stationed or
- places on inland waterways where houseboats can be moored.

This is reiterated in the London Plan 2021 {EB13} at Para. 4.14.8, which states that the requirements of London Plan policy H14 Gypsy and traveller accommodation, are in addition to the duties under section 124.

Furthermore, London Plan {EB13} Policy SI14 considers the strategic role of London's waterways, and in Part A requires development plans and proposals to seek to maximise the multifunctional benefits the waterways provide, which includes their role in providing for boat dwellers. Supporting text (Para 9.14.2) states that London's waterways are multifunctional assets that also provide a home for Londoners living on boats.

In turn, London Plan {EB13} Policy SI16 deals with the use and enjoyment of waterways and in Part D states that "Development proposals adjacent to waterways should protect and enhance, where possible, existing moorings" supports the provision of new moorings and/or required facilities. Supporting text at Para 9.16.2 states that "live-aboard boat dwellers are an integral part of the character of the waterways" and notes that there is a deficit of short-stay and long-term moorings and required facilities to meet the increase in demand for them.

d. are the methodology and assumptions relied upon for assessing the accommodation needs of the Gypsy and wider travelling community, including in relation to transit sites sound and what are the reasons for your stance?

LPA Response: Ealing's assessment of the accommodation needs of the Gypsy and wider travelling community is based on the research conducted by Opinion Research Services (ORS) and its report, West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2018 (WLA GTAA) [EB80].

ORS is considered to be a leading and well-respected independent practice, known for its rigorous research and its ability to deliver high-quality reports, especially in the area of Gypsy, Traveller and Travelling Showpeople accommodation assessment.

The WLA GTAA was completed following an established and robust methodology based on industry standards as set out in a range of key legislation and Government Guidance that were in place at the time. The WLA GTAA supported the requirements of the Planning Policy for Traveller Sites (PPTS) 2015, the requirements of the National Planning Policy Framework (NPPF) 2018 and the Housing and Planning Act (2016).

The GTAA methodology has been repeatedly found to be sound and robust, including through Local Plan Examinations of neighbouring boroughs, Barnet and Brent and by Inspectors at numerous Planning Appeals.

Barnet Council's Local Plan recently has been through examination in public, and it was adopted on 7th March 2025. The WLA GTAA 2018 was used as evidence for Gypsy and Traveller policies, with an update produced in 2021 in response to representations received during the public consultation on the draft Local Plan (Regulation 18). The update concluded that the 2018 GTAA provided a credible evidence base to support policies in the Local Plan for new Gypsy, Traveller and Travelling Showpeople accommodation provision.

Brent Council's Local Plan, which went through examination and adoption in 2022, also used the WLA GTAA 2018 as evidence to support its Gypsy and Traveller Accommodation policies.

ORS's GTAA methodology has also been supported by Inspectors at numerous Planning Appeals.

ORS determined the potential need for transit provision by looking at data from the Government's Traveller Caravan Count, the outcomes of the stakeholder interviews and potential wider issues relating to PPTS (2015).

In their report, ORS recommended that due to very low numbers of encampments, there was no need to provide any formal transit provision at this time (see Transit Recommendations, paras 7.111 to 7.119). They recommended monitoring the situation relating to levels of unauthorised encampments and any potential changes associated with PPTS (2015) such as more households seeking to travel in order to demonstrate that they meet the planning definition.

ORS suggested further monitoring including looking at the reasons why travellers stay in the local area, whether they have a permanent base, where they have travelled from, and whether they have a need or preference to settle in the local area.

ORS also suggested undertaking a review of unauthorised encampments, including the monitoring already suggested once there is a robust new evidence base following the changes to PPTS in 2015. This should be used to establish whether there is a need for investment in any further transit sites or emergency stopping places, or whether a managed approach is preferable.

e. is there an effective policy to determine future windfall proposals?

LPA Response: There are no specific policies within the Ealing Local Plan or London Plan to determine future windfall proposals.

No, the council's approach is to consider Gypsy and Traveller accommodation needs in the same way as all other housing. It has made provision for the minimum necessary to meet the future needs of Gypsies and Travellers by allocating a new site for six pitches. Any windfall applications for Gypsy and Traveller accommodation would be determined based on their individual merits.

Other Specialist Housing:

8. In terms of the local variation to Policy H16 of the London Plan:

a. what is the background to the varied Policy H16, why is variation from the London Plan proposed and what is the evidence justifying it?

LPA Response: Ealing was one of the first boroughs to permit LSPBSL and has had a significant level of delivery over the current plan period.

Demographic evidence analysed by the LHNA identifies a decline in Ealing of young single person households, and also, in agreement with London Plan guidance, that shared living and student housing are inherently a temporary and transitional housing type. There is, therefore, no identifiable strategic need for Large Scale Purpose Built Shared Living (LSPBSL) in Ealing across the plan period, and policy is required to ensure that it makes a contribution to the housing, regeneration and placemaking components of the plan rather than crowding out conventional housing supply and placing pressure on local facilities and amenities.

b. does the evidence support the position that there is no identified local need for shared living in Ealing, taking a restrictive approach, and limiting it Ealing Metropolitan Town Centre?

LPA Response: As above, the key demand demographic in Ealing for Large Scale Purpose Built Shared Living (LSPBSL) is projected to decline over the plan period, and no strategic need target can therefore be adduced to this type of tenure.

LSPBSL is best understood and assessed on a case-by-case basis as the need is created by the development itself in targeting a specific HEI or lifestyle offer. The housing offer of LSPBSL is therefore complementary in providing alternative forms of accommodation rather than a need in and of itself. There are no shared living households as such, rather there are households that may choose shared living for a period of time based upon its specific offer relative to the local market.

As a type of housing that has no absolute local need, and whose principal demographic is in decline within the borough, the local plan would be justified in restricting it altogether as a potential threat to delivery against identified housing needs. There is, however, a case for this type of use where it can contribute to broader development and place objectives as may be the case within Ealing Metropolitan Town Centre.

Past development within the borough has also shown that this type of accommodation is potentially isolating, can be disruptive to existing local communities, and depends to a great extent on access to local facilities and third spaces. This can be provided to some extent on site but the only part of the borough which has both the regeneration potential for this type of use and the range of facilities to support its residents is within Ealing Metropolitan Town Centre.

c. are the local housing needs of all groups of the Borough's communities clearly identified through evidence, consistent with national policy? Does the Plan have appropriate coverage for addressing them, bearing in mind the scope of the London Plan?

LPA Response: Ealing's LHNA is comprehensive, particularly in relation to analysis of and conformity with national policy. It does not directly assess the housing needs of Gypsies, Travellers, and Travelling Showpeople as that is addressed through regional evidence prepared by the GLA in collaboration with London Boroughs. Identified needs for GTTS are addressed by site allocations discussed in answers to Question 7 above.

In addition to these groups, the LHNA considers the needs arising from older people, studios/cohousing, students, service families and people wishing to build their own housing. These needs have a more fluid relationship with the general housing market and studios vs dedicated LSPBSL for example is more a consideration of personal and lifestyle choice than of hard limits such as affordability.

The local plan has sought to make allocations for specialist housing wherever this can be shown to be realistic and deliverable as is the case with the dedicated GTTS site allocation. Other specialist needs are not considered to be deliverable through the local plan alone. LSPBSL proposals will be considered on a case-by-case basis, and self-build and older persons housing benchmarks remain as evidence to manage planning applications and for detailed consideration in the Ealing Housing Strategy.

d. how will whether there is overconcentration of similar uses be judged given the intention to limit development of only Ealing Metropolitan Town Centre, and does Policy H16(ii) provide a clear basis for determining planning applications?

LPA Response: Overconcentration of Large-Scale Purpose-Built Shared Living (LSPBSL) is an unavoidably subjective determination. Consideration was given to a numerical or percentage cap on provision within EMTC such as has been applied to HMOs in different local planning authorities, but this was considered to be arbitrary and unsuited to a mixed location like the town centre. As the policy already includes an amenity and community facilities test at (iii), clause (ii) was phrased in terms of similar uses and would be applied on the basis of comparison with the existing offer of LSPBSL. Applications will need to evidence need for the type of provision that is proposed, and this statement should also evidence this test by comparison with existing LSPBSL and the market that this addresses within the town centre.

e. when read as a whole, will Policy H16 be coherent, and therefore effective, and in general conformity with the London Plan?

LPA Response: Given the explanations set out in response to Q8 the policy is considered both coherent, effective and in general conformity with the London Plan.

f. does Policy H16(B)(iii) repeat Policy H16(A)(2) in part? If not, what does ‘not being detrimental to...the mix and cohesiveness of community use in the area’ mean? Is the term clear and, if not, is modification needed to provide text explaining?

LPA Response: LV H16 B (iii) is intended to relate to local amenity and the necessary range of community facilities, on which LSPBSL may create pressures, whereas the London Plan policy seems to refer to housing mix and tenure.

g. are any modifications needed to Policy H16 for soundness?

LPA Response: No further modifications are necessary.

Small Sites:

9. Does the Plan pro-actively support well-designed new homes on small sites?

LPA Response: Yes. The plan makes provision for appropriate types of residential development across the borough except where it would be prohibited by specific policies or designations, principally industrial designations and protected green spaces. Proactive support for small sites development is set out in the Character Study {EB42} and Housing Design Guide {EB43} which set out good practice guidance for development across a range of sizes and typologies.

The plan as a whole sets out a clear strategy to diversify the sources, locations, type and mix of development through the seven towns approach. This diversifies delivery away from its historic concentrations in Ealing Broadway and Southall, sets clear local visions and guidance for development across the borough, and emphasises the benefits that result from all types and sizes of development.

The Character Study itself forms the basis on which to build design codes where these can facilitate the quality and delivery of small sites.

10. In terms of Policy SSC:

a. what is the background to the policy and the evidence justifying it, including specific detailed thresholds?

LPA Response: The policy is a response to the London Plan's strategic target of 50% affordable housing provision, the historic shortfall against this target, and an assessed need for affordable housing in Ealing of between 55% and 66%. The Small Sites Contribution forms part of a range of measures in the local plan to raise affordable housing delivery and to target this more directly upon identified needs.

Following on from Paragraph 65 of the NPPF, thresholds are based upon discount against the rate for larger schemes and were tested through the whole plan viability assessment. Provision is specifically to be made off site so that no design or management problems should arise and will be based upon actual sales values to avoid the need for unnecessary and viability testing at application stage.

b. paying regard to Paragraph 65 of the NPPF, is the policy consistent with national policy?

LPA Response: NPPF {EB10} Paragraph 65 is a material consideration for the development of the local plan and needs to be set in the context of the rest of the Framework (as set out in Paragraph 3), and the available local evidence.

Ealing has clear need for additional Affordable Housing provision, with identified needs ranging from 55-66% and exceeding the London Plan's strategic target of 50%. The approach of Ealing LPA's Local Plan is therefore two-fold:

- to increase the total provision of affordable housing as a percentage of total housing supply; and,
- to ensure that the size and tenure of these affordable units matches identified needs.

The increase in affordable provision will be achieved through an increase in the threshold from 35% to 40%, and also through the small sites levy set out in Policy SSC.

Paragraph 65 is not explicit as to its reasoning for presumption against small sites contributions in local plans, but it seems to be motivated by a concern for deliverability. As set out above, Policy SSC is designed to impose the minimum necessary burden on development in both financial and bureaucratic terms and has been tested as viable. It is considered that the policy is therefore supported by the Framework as a whole by facilitating delivery against identified local needs.

c. what assessment has been made of any potential impacts on delivery of small sites in the Borough?

LPA Response: The impact of the policy was tested by the whole plan viability analysis and found to be viable.

d. are any modifications needed to Policy SSC for soundness?

LPA Response: No modifications to the policy are considered to be necessary. However, it may aid clarity in distinguishing it from the unrelated London Plan small sites policy and target {EB13, Policy H2} to rename this Policy CMD - Contribution from Minor Developments, and to alter all references in it from 'small sites' to 'minor developments'.

Five-year Housing Land Supply Position:

(Note- The Council has expressed a wish to confirm a 5-year housing land supply in their response to Initial Questions dated 10 January 2025 and has submitted the up-to-date housing land supply position and housing trajectory.

Representors who have previously made representations on housing matters may refer to this evidence in responding to this Matter).

11. What is the latest information available on housing completions in the plan period?

LPA Response: The latest iteration (EB73) of the 5-Year Housing Land Supply Position (5YHLS) and housing trajectory accounts for completion activity occurring between 1st April 2019 until 31st March 2024, reflecting the latest verified completion datasets. Completions occurring since 1st April 2024 are currently omitted from our evidence base work pending ongoing work to identify and verify this completion activity.

Ealing, alongside all London authorities, participates in an annual starts and completions exercise which is co-ordinated by the Greater London Authority (GLA). This exercise typically kicks off in Spring of each year shortly after the end of the financial year, which is being monitored, and the exercise is normally completed in late summer of the same year. Taking the latest reported 2023/24 completion outputs, the exercise commenced in May 2024 utilising a range of sources and methods to establish what progress had been made towards the implementation and completion of the outstanding pipeline of permissions during the period between 1st April 2023 and 31st March 2024. The main checks were finalised by October 2024 and recorded completion activity was submitted on our behalf by the GLA to Government as part of the annual Housing Flow Reconciliation (HFR) return in November 2024.

The next starts and completions exercise examining activity occurring during 2024/25, will get underway shortly. It is anticipated that the main steps will be completed by late summer 2025. As per previous years the GLA will submit these on our behalf to Government as part of the annual HFR return in or around November 2025. This return subsequently informs the calculation of our Housing Delivery Test results.

12. Is there a trajectory identifying the components of housing land supply across the plan period with sufficient clarity? Is it based on up-to-date evidence?

LPA Response: Yes, whilst the trajectory can be read at an aggregated level, to provide transparency around the workings, the trajectory is also organised around its component parts.

There is a clear rationale for the structure and organisation of Ealing's housing trajectory, which has been designed to mirror the methodology underpinning the establishment of the strategic target as set through the London Plan. As per the London Plan, future supply as detailed in Ealing's trajectory is categorised around three main groups with varying size thresholds:

- Large (conventional) sites supply
- Small (conventional) sites supply
- Non-conventional supply (any size)

This categorisation aligns with London Plan evidence (SHLAA), policy (H1 & H2) and monitoring (London Plan and HFR return). The use of different metrics for conventional and non-conventional accommodation also necessitates the need to differentiate between these

components, and again this is entirely consistent with the approach taken by the GLA in their own reporting and in preparing returns to government.

The large conventional and non-conventional supply components are then split further to reflect the stage they have reached in planning (i.e. pipeline (with permission), pending decision, allocation, or masterplan only). This differentiation and associated supplementary info have also assisted in determining the deliverable or developable status of schemes and sites as per the NPPF and has been key in determining how to assign this capacity to future years to reflect the anticipated timing of delivery.

Reflecting the above, Ealing's future supply comprises eight components as follows:

- Large Conventional (pipeline)
- Non-conventional (pipeline)
- Large Conventional (pending)
- Non-conventional (pending)
- Large Conventional (allocation)
- Non-conventional (allocation)
- Large Conventional (windfall/masterplan)
- Small Conventional

Each component is defined to be exclusive to avoid double counting of capacity. For select sites capacity may be split across multiple source components reflecting the range of accommodation types proposed or permitted across an individual site (noting the distinction between conventional and non-conventional), and the variable planning status which may have been reached across the geography of a site. Overtime, as schemes advance through planning and implementation the associated capacity may move between categories.

The most recent iteration of the trajectory (EB73) has been prepared in light of the latest evidence. This trajectory picks up from where the previous iteration (EB72) left off, which accounted for activity occurring up to 31st March 2023. The new trajectory (EB73) effectively moves things forward by a year and accounts for activity occurring since the 1st April 2023, and new information which is relevant to our future supply position. This includes accounting for:

- New residential completions secured between 1st April 2023 and 31st March 2024, which are removed from our future supply.
- Newly permitted residential units granted between 1st April 2023 and 31st March 2024, which adds to our future supply. Where new schemes overlap or supersede existing schemes forming part of the pipeline, adjustments are made to the pipeline supply to remove opportunities for double counting.
- Newly submitted applications with a residential component lodged between 1st April 2023 and 31st March 2024, and which remain pending during this period, adding to our future supply.
- Other evidence of development progress or inactivity occurring or noted since 1st April 2023, which may have a bearing on the pipeline component of our future supply. Evidence of commencements has informed phasing. Evidence of inactivity may also inform our decision to lapse certain schemes removing their contribution from our future supply pipeline.
- New information, including from reps, relating to the availability, ambitions and readiness of landowners and developers to progress sites.

It will be evident from the above that a 'cut-off date' of the 31st March 2024 has been employed in respect of completions, permissions and submitted schemes. This is intentional and reflects the position regarding the availability of completion data. As noted above in response to Question 11, the latest available verified dataset for completions accounts for activity occurring up to 31st March 2024. In preparing the trajectory and establishing an accurate supply position it is important that the same timeframes are employed when reviewing the source data.

Whilst the council is aware of schemes which have been permitted or submitted since the 1st April 2024, these are presently omitted from the pipeline and pending inputs respectively. As an example, it was not considered appropriate to adjust the pipeline upwards to account for an August 2024 permission, without also having the ability to adjust the pipeline (removing delivered capacity) to account for completions up to that same point in August. The latter is not possible as noted already.

This knowledge of these recent permissions (post 31st March 2024) is not entirely disregarded however, and these are noted in the trajectory. For example, whilst that August permission may stay in the pending category for now, that 'future' permission may have had a bearing on our assumptions applied to the phasing of that 'pending' scheme.

13. Table 4 of the Five-Year Housing Land Supply Position Statement & Housing Trajectory (February 2025) [EB73] indicates that deliverability assumptions may not have been consistently applied in the housing trajectory. Is it clear which sites this applies to? Are the deliverability assumptions applied to sites realistic, justified, effective and consistent with national policy, including where there is a reliance on strategic and local infrastructure?

LPA Response: The 5YHLS Position Statement and Housing Trajectory report (EB73) outlines the approach taken to phasing. As detailed in the report the approach taken is bound by the NPPF and associated planning practice guidance and specifically the definitions and treatment of deliverable and developable sites. Having regard to national policy and guidance, only capacity from sites/schemes deemed to be deliverable have been assigned to the next five years (2024/25 – 2028/29). Site capacity assigned to years 6-15 (2029/30-2038/39) is considered to meet the definition of developable.

Noting the guidance contained in the NPPF and NPPG a range of factors have been considered to determine how capacity is assigned over the duration of the plan period. As detailed in the report (EB37) the approach to phasing conventional capacity arising from large sites and non-conventional capacity from sites of all sizes, has been determined on a site-by-site basis having regard to a range of factors including planning status, the scale of the development opportunity, scheme progress, application progress, site availability, land ownership and assembly considerations, viability considerations, infrastructure requirements etc. In considering these factors on a site-by-site basis the approach taken has been to use the best available information, prioritising first any scheme specific intel, before reverting to using more generalised phasing assumptions (as per Table 4). Scheme specific intel might include for example phasing programmes submitted in support of a planning application.

Table 4 is intended to act as a guide to assist the allocation of capacity over the plan period. It describes 36 possible scenarios reflecting both planning status and scale, factors which affect the timing and rate of delivery, and suggests appropriate periods for delivery for each scenario. This is also illustrated in the phasing tab of the trajectory spreadsheet (EB73A). The timings suggested here are consistent with national policy.

These phasing assumptions provide a framework to assist with ensuring that phasing is applied appropriately and with consistency. It is not however intended to be applied rigidly, recognising that scheme specific information where available and credible may provide a more accurate indicator of the programme of delivery, and this scheme specific information may depart slightly from the timings suggested in Table 4.

Individual scheme/site phasing notes are included in EB73A for all large conventional and non-conventional inputs. These notes record which scenario from Table 4 has been employed, or alternatively whether bespoke phasing has been applied instead. Where the latter ('bespoke') is specified, additional information is generally included explaining the basis and evidence underpinning the phasing used.

As a general observation, those schemes which have reached a more advanced stage in planning (i.e. the pipeline) tend to employ bespoke phasing, as that 'thinking' around the delivery programme has already occurred and is typically documented as part of planning application. In contrast in dealing with capacity associated with allocations, which do not yet benefit from a permission or a pending scheme, and where scheme specific information around timeframes has yet to be documented, we have tended to default using the scenarios set out in Table 4.

It should be noted also that a different approach to phasing has had to be taken in respect of the conventional small site component. Given that the small sites contribution 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.

14. Is the approach to identifying and relying upon large windfall sites in years 6-15 of the housing trajectory justified, effective and consistent with national policy? What is the compelling evidence to show that windfall sites will provide a reliable source of supply as anticipated in the Plan?

LPA Response: Yes, the inclusion of a large site windfall component in the trajectory is consistent with the provisions of national policy, it has been calculated employing a robust and proportionate methodology reflecting specific policy interventions and is also supported by historical activity which indicate that large site windfall will likely continue to form a component of our future supply.

In respect of identifying future supply, Ealing's Housing Trajectory (EB73) incorporates a contribution from large windfall sites. This component captures future residential supply arising from specific policy interventions which are likely to have a significant geographical scope, but where specific site opportunities have not yet been identified or nominated. 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 (para 69b of the December 2023 NPPF).

At present this input captures the anticipated contribution arising from Locally Significant Industrial Sites (LSIS) only based on the application of a mixed intensification policy approach. Aligned with London Plan policies E6 and E7, the Local Plan establishes a strategic strategy for Locally Significant Industrial Sites which seeks to protect and intensify these locations through a comprehensive and plan-led approach to mixed intensification. Respective Town Plan policies

(A3, E3, H1E(ii), S1I(iv)) establish the requirement for this process to be led by master plans to guide the proportionate co-location of light industrial uses with residential uses in these areas.

The anticipated contribution of each LSIS towards the future residential supply was calculated having regard to the specific circumstances of each LSIS. In the case of South Acton LSIS, it was possible to draw on a draft masterplan to determine a future residential supply figure for this area. For the other areas where masterplanning work has not yet advanced it was necessary to revert to using the Reg. 19 capacity tool calculator, with some notable adjustments made to the assumptions feeding into this model. Reflecting various unknowns, modest assumptions were adopted with regard to the amount of developable area which may come forward for mixed intensification during the life of the plan. Some adjustments were also made to the parcels to account for recent planning activity which may reduce the developable area further. As currently calculated the total contribution from these large windfall sites amounts to 3,039, which equates to around 8% of the total identified future supply. It should be noted too that all of this capacity is confined to years 6-15. It is anticipated that this figure of 3,039 may increase once masterplanning has been undertaken across each of the areas, and this will better reflect the likely contribution from this source of supply.

In developing the trajectory consideration was also given to the potential inclusion of a large sites windfall which was broader in scope exploring the potential contribution from windfall opportunities beyond the LSIS areas. Whilst some initial work was undertaken to analyse historical activity on large windfall sites, it was recognised that the position is variable overtime reflecting the age of local plan, and changes in the number of allocations identified between each iteration of the Local Plan. It would therefore be difficult to translate these findings into a method for calculating future supply, and so this approach has not been pursued in this trajectory.

Whilst it is not possible then to quantify this contribution, we anticipate that large site windfall opportunities (LSIS and beyond) will nonetheless form a component of our future delivery. Taking the existing pipeline for example, just over half (25) of the large site permissions listed here in the trajectory are on sites which are not currently allocated in the adopted plan, and this equates to around 44% of the pipeline supply. Given that we are 12 years into the life of the adopted local plan this is perhaps not entirely surprising. It is acknowledged also that the adopted plan contains fewer sites relative to the emerging Local Plan, and therefore the probability of schemes being progressed on windfall sites under the adopted plan was higher than it may be going forward.

All these things accepted, it is considered that future delivery on large site windfall (beyond that identified from LSIS areas) will remain an important component, albeit an unquantifiable one.

15. In terms of the ‘unconventional’ pipeline supply, how has the assumption figure of 600 units been calculated and is this justified and effective?

LPA Response: As detailed in Table 3 of the 5YHLS Position Statement the anticipated contribution from non-conventional sources over the next 5 years equates to 600 units. The text solely attributes this supply to the pipeline of established permissions, which it is acknowledged is incorrect as a portion of this identified supply also derives from the category of pending schemes. The pipeline component derives from 3 permissions (2 of which relates to the same site) and equates to 368 units. The site covered by two permissions is well advanced, with completion anticipated to occur in 2025/26. The third permission has not yet been

implemented, and pre-commencement conditions remain to be discharged. A construction management plan indicates a construction management programme of 24 months. A cautious approach has been taken to phasing in this case with capacity being attributed equally over years 5 & 6, and therefore a portion of the permitted capacity deriving from this site is not assumed to deliver in the first 5 years. The remaining contribution of 232 units derives from two 'pending' applications.

Whilst decisions for both schemes were pending on the 31/03/2024, both schemes have now been approved in May and November 2024 respectively, improving confidence around early delivery. The May approval was supported by a construction management plan which gave an indicative final fit out date of Summer 2027. Noting a slight delay in determination, the capacity from this permission has been split equally across year 4 (2027/28) and year 5 (2028/29). Similarly in the case of the November 2024 approval, the submitted construction logistic plan indicates that construction work (from demolition works through to practical completion) is expected to take approximately 27 months, from the first quarter of 2025. It is acknowledged that this is likely to be pushed back noting that pre-commencement conditions have yet to be discharged. A cautious view has been taken apportioning the capacity equally over years 5, 6 and 7.

As outlined above, the figure of 600 units derives solely from known schemes, which are now all permitted in full. The intel around these sites indicates that there is a strong probability that a portion (equivalent to 600 conventional units) will complete within the next 5 years. This is consistent with the definition of deliverable as set out in Annex 2 of the NPPF and paragraph 007 of the NPPG.

16. Are the windfall assumptions justified, effective, consistent with national policy and in general conformity with the London Plan? Does the evidence demonstrate that at least 10% of the Borough's housing requirement will be delivered on smaller sites?

LPA Response: The basis for the large site windfall is outlined in response to Q14 above. The focus of our response here is to address the inclusion of the small site windfall component, and to confirm that the approach taken is justified, effective and consistent with national and regional policy.

The council recognise the important role of small sites in contributing to Ealing's future supply, as emphasized in paragraph 70 of the NPPF, and reflected in policy H2 of the London Plan, and the approach taken to calculating this contribution as evidenced in the housing trajectory and 5YHLS aligns with both. To ensure alignment and conformity with London Plan evidence (SHLAA), target setting, policies and monitoring, the methodology employed for determining all aspects of supply, including from small sites, mirrors that utilised for the London Plan.

London Plan Policy H2 establishes minimum small sites targets for each authority which form a component of the overall housing requirement target. The ten-year small sites target for Ealing is 4,240. These targets derive from the 2017 London SHLAA as moderated by the Panel Report. Unlike the large site and NSC elements of the SHLAA which were based on an assessment of identifiable sites, noting the challenges around comprehensively identifying and estimating capacity individually for all small sites, a different methodology was employed to determine the small sites contribution. A hybrid approach was taken utilising historic trend based data for select small site development types (i.e. change of use and new build yielding more than 10 units) and modelling for other small site development types (i.e. conversions and new build

developments of 10 or fewer homes), based on the level of existing suitable stock present in an area which is accessible and may be suitable for intensification.

In the context of each authority having to evidence their own supply position and noting the provisions in paragraph 72 of the NPPF around the potential reliance on windfall and the various qualifications attached to this, the supporting text to policy H2 of 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, and therefore provides the compelling evidence needed to satisfy paragraph 72 of the NPPF. Specifically, paragraph 72 notes that any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends, which has clearly been demonstrated in this instance.

Reflecting the above, Ealing has utilised the 2017 SHLAA evidence articulated through the London Plan ten-year small sites target, as a basis for estimating and evidencing future supply from small sites. In order to capture this within the trajectory it has been necessary to annualise the 10-year total. This annual figure has also been rolled forward beyond 2028/29 to cover the full trajectory period. As the small site component has been derived from a combination of modelling and historic trend analysis rather than known sites it is not possible to attribute the capacity to the years in the same way as was possible for large conventional sites. 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, it is acknowledged that delivery on small sites may inevitably fluctuate from year to year.

The trajectory identifies a total cumulative requirement of 43,140 units over the full trajectory period. Adjusting this total to account for supply already delivered between 2019/20-2023/24, the outstanding requirement is 35,464 units. The identified future supply of 6,360 from small sites would meet 18% of this requirement.

As a proportion of the total identified future supply (38,497), the identified small sites component amounts to around 17% of this total supply. In respect of the identified allocations in the new Local Plan, a total of 82 sites were identified at Reg. 19 stage of which 77 have a residential component. Of those with a residential component 12 (16%) sites qualify as small sites based on the London Plan definition (smaller than 0.25ha). Based on the NPPF definition (sites no larger than one hectare), a total of 34 (44%) of the allocated sites would meet the small and medium sized definition. Against all metrics the evidence demonstrates that in excess of 10% of the housing requirement, and supply, would be met from small sites.

It should be noted that for the purpose of the trajectory, that separate individual site contributions from the 12 small site allocations referenced above have each been zeroed. Similarly, capacity from permitted or pending schemes on sites smaller than 0.25ha are also typically excluded (zeroed) from the individual site breakdowns. This is necessary to ensure that no double counting occurs with the fixed small site input which subsumes any contribution from these known small sites, but such activity on identifiable sites nonetheless adds confidence to the assumed small site input.

17. Has a five-year supply of deliverable sites been assessed separately for Travellers?

LPA Response: Yes. Ealing's published housing trajectory and 5YHLS (EB73) excludes traveller accommodation in its assessment of supply. The main reason for this is because the housing

requirement as derived from the London Plan target is based off an assessment of conventional and non-conventional accommodation types, none of which cover traveller accommodation. In monitoring activity (completions) or supply against this housing requirement, there is currently no provision or mechanism to convert pitch provision into a conventional unit metric. In the case of allocation 09NO, no capacity is assumed from this site.

An assessment of need and supply of accommodation for travellers over the lifetime of the plan is addressed separately via EB74 and EB80. Need throughout different stages of the plan period is detailed in Chapter 3 of the site assessment report (EB74). The site assessments at Chapter 6 considers whether sites are deliverable, developable or neither. It assessed that Site 5a. – the West London Shooting Ground East (which was the eastern part of a much larger parcel of land) - and noted that it has no physical barriers to development and could be developed within 5 years. However, it noted that the council would need to amend the proposed Green Belt designation in the relevant area and pursue negotiations with the landowner.

Following consideration of feedback from a focused Regulation 18 consultation (5 July 2023 – 16 August 2023), the site search was narrowed to include the proposed site allocation at the Kingdom Workshop, Sharvel lane, Northolt (09NO). The council, have since engaged consultants to undertake a Stage 1 Options Appraisal of the potential for redevelopment of this site. The study interrogates the main constraints and opportunities for the site and investigates options for the site. The report will be published later in the year following engagement with the local Gypsy and Traveller community and their representatives. It will help pave the way for the submission of a planning application.

18. Do the policies in the adopted development plan as a whole provide appropriate contingency to ensure sufficient supply of homes?

LPA Response: Yes, an appropriate level of contingency has been identified. Based on the identified supply as detailed in the housing trajectory cumulative completions are expected to total 46,173 net units, exceeding the cumulative requirement figure of 43,140, by 3,033 units. 3,033 is equivalent to around 7% of the plan requirement and is considered to represent a healthy contingency.

Whilst we believe the trajectory is comprehensive in identifying and examining sources and supply, in estimating site yield, and particularly where sites do not yet benefit from an extant permission, we have tended to adopt a more cautious approach. The capacity estimates may therefore underestimate what will ultimately be permitted and delivered on individual sites, and therefore the contingency may in fact be larger.

19. Does the evidence demonstrate that the Plan, taken together with completions, commitments, and allocations in the existing development plan for the area, will provide:

a. A five-year supply of deliverable housing land?

b. A supply of developable housing land for the plan period?

LPA Response: This position is documented and evidenced via Ealing's Housing Trajectory and 5YHLS Position Statement (EB73). Based on the current iteration of this output it presents the following findings:

a. The identified deliverable supply anticipated to be delivered between 2024/25 to 2028/29 amounts to 13,016 units, which is predominately derived from extant permissions and

supplemented with capacity from pending schemes and a fixed small site input. A number of these permissions and applications fall within the geography of allocated sites, and the allocations facilitate and support their delivery. The identified deliverable capacity of 13,016 units equates to 78% of the cumulative requirement for the same five-year period, with an absolute shortfall of 3,657 units. This equates to 3.9 years of supply. Presently then the council is unable to demonstrate that it can identify sufficient deliverable supply capable of meeting the 5-year requirement. In part this arises because of the recent triggering of a 20% buffer which sizably increases the measurably requirement, and without which the supply position against the requirement for the next 5 years would be much improved.

b. Reflecting the policies and allocations contained in the Local Plan, a developable supply of 25,481 units, has been identified. When added to the deliverable capacity, a total supply of 38,497 units has been identified. Accounting for completions since 2019/20, cumulative completions until the end of the plan period in 2038/39 are expected to total 46,173 net units exceeding the cumulative requirement figure of 43,140 units.

20. Are any changes required to the housing trajectory and, if so, would necessitate modifications to the Plan?

LPA Response: No, no changes are anticipated in respect of the published trajectory (EB73).

It should be noted that the published trajectory has itself been informed by the representations received at Reg. 19 stage and suggested modifications arising from that process.

As detailed in response to Q11 above the publication of future updates of the housing trajectory and 5YHLS position are tied to the annual programme for checking and validating completion activity. It is anticipated that a new trajectory will be published at the end of 2025 or early 2026 following our annual HFR return in November 2025.

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