

Matter 4: Housing

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

Questions

Housing – general

1. Nowhere does the Plan set out the housing target for the whole of the Plan period 2024/25 – 2038/39 as a single figure. Additionally, the total target information is easily missed under SP4.3 Genuinely Affordable Homes. Both of these factors render the Plan unclear.
2. The Plan does not quantify where in the Borough residential development will be supported. This information is available as a table in the town breakdown tab of the housing trajectory (EB73) in total for each town and split by size, type and development stage, and should be included in the Plan for clarity.
3. The Non-Technical Summary of the IIA (EB28, p7) identifies ‘moderate levels of development over and above the committed development pipeline at Southall Opportunity Area’. Yet the town breakdown in the housing trajectory (EB73) assumes over 6,500 units as pending, allocated or windfall in Southall over the Plan period, more than any other town. Additionally, Acton is not mentioned at all for spatial intervention despite the third highest number of housing units (4,407) being slated as pending, allocated or windfall over the Plan Period.
4. Policy HOU mentions ‘an appropriate mix of tenures and unit sizes’ and ‘identified local needs for tenure and mix’. Policy SSC talks of ‘defined local needs in type and tenure’ without further elaboration. Policy H16 makes no mention at all. The structure of size and tenure need is available in the Local Housing Needs Assessment (EB76) and set out in Figure 5 (p10).

Ealing Matters would like the Local Plan to provide an overview of overall housing policy in one place bringing together the information set out above and organised along the lines of the [Wandsworth Local Plan 2023-2038 SDSI Spatial Development Strategy 2023-2038](#) (Strategic Policy) (p34).

Affordable Housing

See Ealing Matters submission 4, issue 4 on affordable housing in general and submission 9 on Policy HOU in particular. Additional comments to the inspectors’ specific questions on Policy HOU are:

5. f. For Policy H(A)(i) and (ii) the use of percentages without articulating what the percentage relates to is vague and liable to be misinterpreted – (i). 50% of what? (ii). 70% low-cost rent/30% intermediate refers to what? The interaction with Policies H6 and H10 of the London Plan are also unclear. More broadly, Ealing Matters would like to see more precision in the wording of the policy and the use of the London Plan wording on these topics for greater clarity and alignment.
- j. For Policy HOU(E) we would argue that any contribution to wider affordable housing need should not be in the form of conventional housing units on site given that the demographics of affordable housing users and occupants of LSPBSL are likely to be very different. The Local Housing Needs Assessment (EB76) under Studio Apartments and Co-Housing (p75 and 76, paras 5.20 – 5.22) argues that LSPBSL tenants are likely to be recent graduates or post-graduates, compared with the likely much broader demographic of the tenants of permanent affordable housing. We believe that this could lead to social friction.
- m. The Statement of Common Ground with the GLA (S22d) states on affordable housing that ‘boroughs setting their own threshold level for affordable housing risk the implementation of the London Plan threshold approach and in those instances will be raised as general conformity objections.’

Other Specialist Housing

8. a. The focus of the variation is on limiting LSPBL to Ealing Metropolitan Town Centre. The justification in para 5.23 is that 'LSPBL depends for the amenity of its residents upon access to excellent public transport connections and a wide range of local amenities.' These characteristics are not, however, exclusive to Ealing Metropolitan Town Centre, and no evidence is offered to support the concentration of this type of housing there.
- b. See Issue 1 in Ealing Matters' submission 10 with regard to identified local need and the risk of over-supply and Issue 2 and the response to 8a. above with regard to limiting this form of development to Ealing.
- c. Local housing needs are not clearly identified through evidence for people with disabilities and it is not clear whether the Plan makes has appropriate coverage for addressing them. Student needs are only identified cumulatively at the London rather than Borough level leading to concerns about potential over-supply.
- d. Since the Monitoring Framework, Appendix 1 of the Plan (p481), does not propose to monitor completions of this type of development in contrast to other specialist housing, e.g. for older people, students and gypsies and travellers. In the absence of a maximum target number of units of this type and monitoring of approvals, it is hard to see how Policy H16(ii) can be achieved.
- e. Para 5.24 of Ealing's Policy H16 (local variation) conflicts with the London Plan in terms of requiring the affordable contribution to be built on site rather than providing a financial contribution towards affordable permanent housing elsewhere.
- f. Ealing Policy H16(B)(iii) wording sets a lower bar for the acceptability of these schemes ('not detrimental to') than the more positive London Plan H16 (A)(2) wording ('contributes towards'). There is no suggestion as to how the achievement of that goal would be monitored.
- g. See Ealing Matters submission 10 Modification 1.

Small Sites

9. While para 5.26 talks of the importance of small sites in housing delivery, there is no mention of well-designed new homes in the Plan. While the evidence base contains a housing design guide (EB43), it contains no specific design recommendations for small sites.
10. Policy SSC appears to be inconsistent with national policy and is therefore questionable. In the context of questions 10a. and 10c. it is concerning that there is no proposal to monitor the absolute number of small site completions.

Five-year Housing Land Supply Position

Ealing Matters questioned the deliverability of the housing supply target in its Regulation 19 submission 4, which was based on the Five Year Housing Land Supply Position Statement and Housing Trajectory dated November 2023 (EB72). Since then, the situation has worsened considerably according to the Housing Trajectory dated February 2025 (EB73A), with Ealing delivering net completions of only 966 units against a projection of 1,670 and its annualised target of 2157 in 2023-24 (the most recent year). This trend is not confined to Ealing, but has been echoed further afield in London and around the country, making the new trajectory still more questionable.

Based on our experience of observing development in Ealing for the last decade, this, combined with the very high numbers of housing units that Ealing is expected to deliver, will lead to pressure on the part of developers for ever greater height and mass on those sites that are built out, with worsening amenity and pressures on infrastructure. This carries with it the risk of undermining the whole planning system in the eyes of the public, particularly if the share of affordable housing within the total fails to meet local needs.