

## Ealing Local Plan

### Matter 4 – 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?**

We have considered the new *Five-Year Housing Land Supply Position Statement & Housing Trajectory*, February 2025.

As we observed at the time, the Local Plan did not clearly define the plan period, although the original trajectory supporting the submission version indicated that this could be 2023/24 to 2037/38 (based on our reading of the previous Housing Trajectory published in November 2023).

The new trajectory (based on the February 2025 update paper) now indicates that the plan period is 2024/25 to 2038/39 (see page 23) although this does not appear to be stated clearly anywhere in the paper. Compared to the submitted Local Plan, the trajectory appears to have shifted forward by one year.

The reason for making this point, is that one of the most essential things that this new Local Plan should do, is to deliver the London Plan housing requirement of 21,570 homes in full by 2028/29. This is what is required by the London Plan, and the GLA has written to other London boroughs with its expectation that this is what local plans should achieve (e.g. Kensington & Chelsea, Enfield, City of London and Wandsworth).

We note the discussion on page 7 of the *Five-Year Housing Land Supply Position Statement & Housing Trajectory*, February 2025, paper. The implication in the second paragraph on page 7, is that the deficit in delivery accumulated since the start of the London Plan in 2019/20 will be carried over beyond the end date of the London Plan in 2028/29. Even though the Sedgefield approach is being used by the Council (to address any under-delivery within the five-year supply period) the effect of this measure is to carry over the London Plan deficit beyond the life of the current London Plan. We consider this to be contrary to the London Plan. See Policy H1, parts A and B, and the supporting text. The GLA's Statement of Common Ground with Ealing Council – outstanding matters – indicates that the GLA is unhappy about the deficit not being addressed in full by 2028/29 (page 1).

Based on the figures that the Council has provided on page 7, it shows that 7,676 net completions have been achieved since 2019/20. This would leave a deficit of 13,594 homes to be provided by 2028/29 (ignoring any buffer) although it may be less than this once the figures for 2024/25 are available. However, as things stand, this would suggest a revised annualised rate of 3,398 dwellings, relating to these four years:

2025/26  
2026/27  
2027/28  
2028/29

These are the last four remaining years of the current London Plan.

It would be helpful to know the net completions for 2024/25 although the GLA's Residential Completions Dashboard provides a source of information:

<https://data.london.gov.uk/dataset/residential-completions-dashboard>



This indicates 44 completions in 2024/25. This is 'live' data which means that the data for more recent years may be incomplete. Major updates occur in August / September.

We have been unable to detect within the *Five-Year Housing Land Supply Position Statement & Housing Trajectory*, February 2025, paper, actual figures for the expected completions for the last four years. The graph in figure 1 on page 23, indicates rates of delivery around 2,000dpa up to 3,200dpa. Even if one assumes that an average of 3,000dpa could be achieved in each of the four years, delivery would still fall some way short of the London Plan requirement.

The Council may dispute this interpretation, but it is possible that the requirement for the five-year land supply might be greater than the case presented, taking into account the need to deliver the London Plan requirement of 21,570 in full by 2028/29.

The five-year land supply, therefore, would need to ensure that the backlog accumulated against the London Plan since 2019/20 – possibly 13,594 net additions – is met by 2028/29, meaning that both the Liverpool and Sedgefield methods are largely irrelevant here. It would point towards the need for a heavily front-loaded trajectory.

***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?***

We refer to our representations. The Plan is unclear about the application of London Plan policies GG2, H1 and H2 and the principle of incremental densification, especially in PTALs 3-6 and within 800m of a train/ tube station of town boundary.

This principle could be articulated clearly and more forcefully in a revised version of policy SP4.1, but with a clearer reference to the acceptability of residential development, especially small sites (which the London Plan defines at sites of a quarter hectare in size or less).

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