

Mr D. McCreery and Ms C Dillon,
The Planning Inspectorate
c/o Paige Gaughan,
Local Plan Programme Officer,
Ealing LPA

Ealing Council
Perceval House
14-16 Uxbridge Road
London W5 2HL

Tel 020 8825 8056

Your ref	My ref	Extension	Date
	CR/022	8056	22nd October 2025

Dear Sir/Madam,

**Examination of the Ealing Local Plan 2024-2039:
Ealing LPA's Response to Post Hearing Action Logs, Part 5 -
dealing with items 3.3, 3.4, 4.2, 4.4 and 4.6.**

I wrote to you setting out a record of the agreed log of actions on 3rd July 2025 {EX19} that arose from the hearing sessions that dealt with Matters 1 to 5 in Block 1 between June 16th and June 19th 2025. I also note the further clarification by you in subsequent correspondence on 12th September 2025 (EX24) that related to Matter 9.

This letter provides the fifth batch of council responses relating to Action Log items 3.3, 3.4, 4.2, 4.4 and 4.6.

Matter 3: Vision, objectives and spatial strategy -

Action 3.3: To check and confirm the date of publication of the SFRA Level 1 report.

LPA Response: The level 1 SFRA went live in April 2018. It was published in a website format, and functions as a live document, as detailed in section 6 of the report.

Elements of it have been reviewed and updated since April 2018 to account for changes to the NPPF and the associated Flood Risk and Coastal Change PPG. A more substantive update was made in August 2024.

Several of the web map layers supporting the SFRA are linked to external sources and are automatically updated when the Environment Agency (EA) publishes revised data. The EA updates and publishes main river model mapping on a cyclical basis, and section 6 of the report notes updates to the main river models since April 2018 led by the

Environment Agency, although none of these relate to Ealing. The assessment was also updated to account for the 2023 update of the River Thames Model.

All links embedded throughout the assessment are linked to the latest national policy and guidance. The Level 1 SFRA was also updated to account for our Level 2 outputs. Provisions are in place for future updates as and when they arise.

Action 3.4: To confirm under which version of the NPPF the SFRA has been produced and updated.

LPA Response: With regard to the Level 1 SFRA it was initially prepared against the 2012 NPPF, but regard was also had at the time to the draft revised NPPF (March 2018 – subsequently published in July 2018).

As noted above (in response to Action 3.3), further updates were undertaken to account for more recent policy changes. The most significant is the update to the PPG in 2022, which affected the definition of a functional floodplain. The ability to reflect this in updates of the SFRA is tied to the availability of the Environment Agency's updated fluvial flood models. These updates are being incorporated incrementally based on the coverage of the flood models and the programme for updating these.

The Level 2 SFRA was initially prepared against the September 2023 NPPF. This assessment accounted for the 2022 PPG updates.

Matter 4: Housing -

Action 4.2: Note on whether or not to include broad housing delivery nos by town, including addressing the potential role of the monitoring framework in tracking progress at a town level.

LPA Response: Currently the Local Plan assumes a level of growth consistent with the targets set within the London Plan. Specifically strategic policy SP4.3 of the Local Plan confirms the intention to secure the delivery of 21,570 net housing completions over the ten-year period 2019/20 to 2028/29. This policy also confirms that this target (annualised) is rolled forward beyond 2028/29 to cover the remaining plan period up to 2038/39.

The delivery target expressed via SP4.3 and originating from the London Plan represent an LPA based figure. Separate town-based completion targets are not included currently in the Local Plan.

Whilst performance is ultimately measured at an LPA level through the likes of regional monitoring and the national Housing Delivery Test, it is recognised the tracking delivery/progress at smaller geographies may also be useful.

The process of establishing town-based delivery numbers from an LPA requirement has not been determined. Arguably the approach would be tied to the methodology used to generate the original LPA based figures. As noted elsewhere the LPA targets are a direct output of a capacity-based exercise, the 2017 Pan-London SHLAA. The Council no longer has direct access to the platform or modelling utilised for this original exercise to generate town-based capacity figures now. Moreover, that exercise represented a snapshot in time, and attempting to recreate the same output from an earlier point of time but at different geographies would be difficult and perhaps ill-advised.

Whilst aspects of their methodology are distinct (the 2017 SHLAA is probability based), the housing trajectory generates comparable outputs and brings our understanding of supply and anticipated future delivery more up to date. The published trajectory has already confirmed that the delivery targets are achievable over the life of the plan. Specifically, the trajectory identifies that cumulative completions over the full trajectory period are expected to modestly exceed the cumulative requirement. Again, this position has been expressed at an LPA level only currently. It is noted however that much of the data inputs sitting behind the trajectory have spatial attributes attached to them. It is therefore possible to organise these outputs at a town-based level as well, and Table 7 of EB73 details the anticipated cumulative completions by each of the seven towns.

Consideration has been given to whether these town-based supply figures should be incorporated in the plan, either within the spatial strategy covering all seven towns, or separately in each of the town-based chapters. The following reservations have however been noted:

- The figures are supply based providing the evidence needed to demonstrate that the plan is achievable. There is a risk that these figures be interpreted and treated as delivery targets when this is not their purpose.
- The cumulative supply figures currently exceed the cumulative requirement and so are not directly relatable to the overall target expressed through SP4.3.
- The supply figures represent a point in time, an output of the latest published housing trajectory. These figures and town splits will inevitably change with each iteration of the trajectory. Therefore, any figures published now will not endure over the life of the plan.

- Performance is measured regionally and nationally at an LPA level only. There is no requirement to report at different spatial scales. It is unclear what if any action is needed in the event that completions were to vary from any town-based figures.

For the reasons given above it is recommended that town-based delivery numbers are not included in the published plan.

However, recognising the interest in tracking delivery at different spatial geographies, it is proposed that the Monitoring Framework at Table 1 in Appendix 1 of the Plan includes reference to town-based reporting. As well as those indicators pertaining to housing delivery, this may also be useful for a number of other indicators listed here. In most cases the datasets underpinning each measure have spatial attributes attached to them. It is therefore feasible that reporting could be broken down to town level as well.

Therefore, a new suggested modification is recommended at the end of paragraph A1.4 to confirm that the indicators will be measured at different scales, tied to the targets and the availability of the datasets as follows:

A1.4 The framework identifies which policies the indicators are intended to measure, and where appropriate targets have also been specified for select indicators. It is not possible to identify meaningful indicators for all policies in the plan, but the performance indicators identified here are considered to represent the core measures. **In most cases the targets expressed here relate to the full LPA geography. Where meaningful and feasible, these indicators will also be reported at a town-based level.**

Action 4.4: Produce an errata for EB73 regarding what components make up the 5-year supply.

LPA Response: This action seeks to address a minor error identified in the commentary of EB73 regarding the source of the non-conventional input. As detailed in Table 3 of the 5YHLS Position Statement (EB73) the anticipated contribution from non-conventional sources over the next 5 years equates to 600 units. The text below this table on page 12 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.

Whilst of no material significance the error is acknowledged and explained in our response to Q15 of the MIQ for Matter 4. Although forming an Evidence Base document it was agreed that an errata would

be prepared for EB73 – see attached at Appendix 1. The errata details the corrected text as follows:

‘In respect of supply the exercise has identified a supply of deliverable large sites capable of delivering 10,296 units over the next five years. Utilising the current small sites target in the London Plan a contribution of 2,120 is added to this supply. A further contribution of 600 has been identified from the pipeline of non-conventional permissions, **and from pending non-conventional applications**. Combined the total supply anticipated to be delivered over the next five years equates to 13,016 net units.’

Action 4.6: Note on steps taken to verify assumptions around deliverability (specifically for the pipeline and pending inputs)

LPA Response: The 5-YHLS position statement {EB73}, and the response to Q13 of the MIQs for Matter 4, outlines the approach taken to phasing capacity more generally. The capacity assigned to the next five years (2024/25 – 2028/29), must satisfy the definition of ‘deliverable’ as described in the NPPF and supporting PPG. Bound by this definition, the distribution of capacity has been determined and assigned on a site-by-site basis having regard to a range of factors including planning status (application and scheme progress), the scale of the development opportunity, site availability, land ownership and assembly considerations, viability considerations and infrastructure requirements.

In considering such factors, the approach taken has been to use the best available information, the source of which may vary from site-to-site, and recognising that individual phasing assumptions are not necessarily fixed and may change overtime to reflect the evolving circumstances of a scheme and in light of new information.

In carrying out this exercise it is evident that often there is no single definitive source for determining phasing, and such judgements around the timing of delivery often benefit from corroborating this position across multiple sources, and then also revisiting and verifying such assumptions when circumstances or information changes.

The latest published trajectory (February 2025) identifies deliverable supply equating to 13,016 net units. Of this total 62% (8,015) already benefit from full detailed permission, and evidence indicates that these units are anticipated to complete during the first 5 years. The remaining 38% comprises 1,462 with outline permission, 1,055 units from pending schemes, 364 from allocations not tied to specific schemes and 2,120 from small sites.

The make-up of this identified deliverable supply is consistent with that expected having applied the definition of deliverable to the exercise of phasing. Specifically, the majority of this capacity (10,532 or 81%) derives from known planning schemes which are already part of the system.

Given the significant reliance on actual planning schemes which are already 'in the system,' the identification of this supply as being deliverable, and the verification of this status has typically been informed by the availability and application of project specific evidence as opposed to basing this on more generic phasing assumption. When phasing capacity the following sources and methods are used based on status/progress of site/scheme.

For conventional accommodation originating from large sites and non-conventional accommodation of any size:

Where the permission is pending:

- We consult case officers to establish a probable decision date, having regard to the statutory deadlines. Establishing such key dates will inform the delivery programme, and ultimately therefore inform whether the capacity qualifies as being 'deliverable.'
- Similarly, we consult with our legal team and case officers to ascertain when legal agreements may be signed, where relevant.
- We identify and review any construction or delivery programmes submitted alongside the application. In some cases, these may be taken at face value and replicated in the phasing applied in the trajectory, in others the phasing programme may be moderated where delays are already evident at the decision-making stages. For example, if the decision-making stage has been delayed by 6 months, the delivery programme may also be pushed out by 6 months.
- We also have regard to specific input from the applicants or agents themselves. In a number of cases the applicant is the Council itself, as is true for many of the large estate regeneration schemes. Regular dialogue takes place with key project leads in the Council, or external development partners, to establish a better understanding of the construction and delivery programme.
- This is also an appropriate stage to verify and confirm the make-up of individual schemes, to ensure that the baseline information is accurate for the purpose of monitoring activity going forward. Potential incidences of double counting can also be flagged as this stage.

Where permission is given but not started:

- We would examine the status of any pre-commencement conditions and consider the level of work needed to satisfy these where these have yet to be actioned and discharged.
- Where the permission given is in outline only, we would review what progress has been made to secure reserve matter approval.
- We would also seek to establish whether any revisions to schemes may be sought, or even where alternate schemes may be pursued instead, and consider the implications for the timing of future supply. To this end, in the context of updating the trajectory, checks are carried out with case officers and project leads to ascertain the future intentions / plans for these sites.
- As above we review any delivery programme details submitted as part of the application and seek input from applicants and agents.

Where permission is given and works have started:

- We would look to establish what level of progress has been made to date. We would test whether the speed of progress/delivery to date aligns with submitted programme or early assumptions. Where they do not, we would consider whether our assumptions around delivery going forward need to be moderated/adjusted.
- Where works have been delayed or stalled, we would seek to understand the factors underpinning this on a case-by-case basis and seek to understand what efforts / actions are being taken to unblock such delays. Again, input would be sought from case officers, project leads and applicants.
- Scheme progress is tracked as part of the annual starts and completions exercise, utilising a range of sources to determine whether works have started or completed, including Council Tax data (internal and external), Building Control data, EPC data, Street Naming & Numbering, CIL records (commencement notices), physical site visits, aerial imagery and direct input on progress from project leads and applicants. This exercise is also supplemented with more frequent checks (albeit typically more selective) undertaken in the context of other exercises, including the preparation of a revised trajectory.

As noted previously in EB73 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.

The only other component of the current identified 'deliverable' supply not accounted for in the commentary here is a very modest contribution (364 units) from large site allocations for which neither a relevant permission or pending scheme exists at present. This component currently derives from six sites. In all cases capacity has been assigned to the back end of this period (year 5 only), and the units assigned to year 5 represent a portion of the overall total which is assigned to years 6 onwards.

The Council has a direct interest in three of the six sites as a landowner, which is relevant in respect of our confidence around the timing of delivery. Although the specific units counted here did not benefit from a live application or permission as of 31st March 2024, a number of the sites do already benefit from permissions across the wider site or benefit from an alternative permission, and therefore the momentum of delivery has already been established. For one of the sites a scheme has been submitted, approved and commenced since 31st March 2024, and the capacity and phasing reflect the delivery programme now approved.

Individual scheme/site phasing notes are included in EB73A for all large conventional and non-conventional inputs. These notes explain the basis and evidence underpinning the phasing set for each input in the trajectory.

Please let me know if you require any further information or clarification on these matters.

Yours sincerely

Steve Barton

Steve Barton,
Strategic Planning Manager

Tel 020 8825 8056
Email bartons@ealing.gov.uk

APPENDIX 1:

Errata – EB73:

Five Year Housing Land Supply Position Statement & Housing Trajectory, February 2025, Version 2

A minor error has been identified in the commentary of EB73 regarding the source of the non-conventional input. The text below table 3 on page 12 solely attributes the source of the non-conventional component 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.

Page / Section / Paragraph	Published Text	Corrected Text
12, '5 YHLS Findings', Paragraph 3	In respect of supply the exercise has identified a supply of deliverable large sites capable of delivering 10,296 units over the next five years. Utilising the current small sites target in the London Plan a contribution of 2,120 is added to this supply. A further contribution of 600 has been identified from the pipeline of non-conventional permissions. Combined the total supply anticipated to be delivered over the next five years equates to 13,016 net units.	In respect of supply the exercise has identified a supply of deliverable large sites capable of delivering 10,296 units over the next five years. Utilising the current small sites target in the London Plan a contribution of 2,120 is added to this supply. A further contribution of 600 has been identified from the pipeline of non-conventional permissions, <u>and from pending non-conventional applications</u> . Combined the total supply anticipated to be delivered over the next five years equates to 13,016 net units.