

Examination of the Ealing Local Plan 2024-2039:

Ealing LPA's Response to Post Hearing Action Logs, Block 2 Note dealing with Action 4.19

Action 4.19 - (SP 4.3A) - To explore how the LPA can update the trajectory base date and content to demonstrate a 5-year housing land supply at adoption.

LPA Response – The council acknowledges the wording at paragraph 69 of the NPPF which indicates that the five-year calculation window should start following the intended adoption of the Local Plan. Based on the current EIP programme, adoption is anticipated during 2026.

The latest published iteration (Version 2 - EB73) of the 5-Year Housing Land Supply Position (5YHLS) and Housing Trajectory distinguishes between 'past' and 'future' years, and the 31st March 2024 and 1st April 2024 mark the end and start of the past and future years respectively in this iteration.

As explained previously, Ealing's Local Plan inherits a strategic housing requirement from the London Plan, and the targets set within that are required to be monitored from the 1st April 2019. As is commonly the case this base date pre-dated the adoption of the London Plan by almost 2 years. The London Plan base date is significant because national guidance requires us to account for any shortfall arising since the start of the target period relating to the strategic housing requirement (i.e. therefore from 2019).

Given that the Local Plan and London Plan are inextricably linked with regard to establishing the housing requirement, the council does not intend to revise the base date. The base date for the trajectory and 5 YHLS calculation remain the 1st April 2019. The council does however acknowledge the need to update the date which determines the break between past and future years.

As noted already the previously published trajectory and position statement (EB73) employs the 1st April 2024 as the start date for future years. The 5 YHLS calculation is informed by the identified deliverable supply within the trajectory over a five-year period from the 1st April 2024 (i.e. covering the period 1st April 2024 until 31st March 2029 or 2024/25 – 2028/29). Therefore, the point for this future five-year window was and is bound by the availability of verified datasets, and specifically completion data, which determines the latest end date for the 'past years' and

therefore the start date for future years. Currently this completion data is verified once annually and is dictated by the established work programme for monitoring development activity (starts and completions), which itself is determined by the programme for submitting Housing Flow Reconciliation (HFR) returns and the subsequent publication of the Housing Delivery Test results. At the point that the published iteration (EB73 - version 2) of the trajectory was prepared, the latest monitoring exercise undertaken in summer 2024 captured completion activity occurring up to 31st March 2024. Since this time the council have undertaken a further round of monitoring and have now been able to capture completion activity up to 31st March 2025. This data has been verified as part of our HFR return in September 2025. Based on the availability of this new data it would now be possible to update the trajectory accounting for activity occurring up to the 31st March 2025 and setting the 1st April 2025 as the new start date for 'future years'.

As explained in the position statement one of the core methodological rules underpinning the preparation of the trajectory is that the same cut-off date is employed consistently for each of the inputs feeding into the trajectory. For example, if the trajectory can only accurately and comprehensively account for completions occurring up to 31st March 2025, and which has the effect of reducing future supply, it also stands to reason that it should only account for new additional future supply arising from permissions and pending schemes established up to the same point in time.

Whilst moving the future period of the trajectory forward by a year would be advantageous, and sensible based on the availability of data, the first future year of this updated trajectory would still pre-date the anticipated adoption date in 2026 by around a year. To attempt to remedy this misalignment of the reported dates with the actual dates, and move it forward by a further year (2 years in total), bringing the start date for future years into 2026 (for example the 1st April 2026) to align as best as possible with the post adoption period, would be very challenging, particularly when any outputs need to be comprehensive and robust.

Recognising the time / resource which would need to be committed to update the trajectory to capture activity occurring during 2024/25, the council has no further capacity currently to establish activity (completions, starts, lapsing, permissions, applications etc) occurring during 2025/26. Much of the data we rely on to undertake this activity for the completion component at least typically takes time to source and may not be available for a number of months after the financial year has ended

(usually around May/June). Moreover, given that we still have three months outstanding in 2025/26, the inputs for that year would currently have to be based on a combination of actual and predicted data. Examining data on a partial year basis is complicated and mixing actual and predicted data across a given year increases the potential for double counting or omissions and therefore isn't considered to be robust. It is also unclear how adopting a partial year approach would interact with other aspects of the calculation namely the shortfall calculation, the HDT / HFR inputs and buffer, all of which are based on full year outputs.

With regard to the HDT outputs (the official completion statistics and consequences) it should also be borne in mind that the latest published HDT results (December 2024) only account for delivery occurring up to 2022/23 (31st March 2023). For the 2023/24 and 2024/25 years we currently rely on the HFR figures. As noted already 2025/26 hasn't yet ended, and any HFR figure for that year is not likely to be confirmed before Autumn 2026 at the absolute earliest. In the absence of confirmed HDT or HFR figures for 2025/26, the availability of which is beyond the council's control, we would be cautious of moving the future year start date in the trajectory past 1st April 2025 and would question whether this is a reasonable expectation.

Reflecting on the action, and specifically the wording in the NPPF around establishing our deliverable supply position following adoption, and noting our position outlined above, the council proposes to update the trajectory and 5YHLS calculation as follows:

Trajectory 2026 Update (version 3)

- It will cover the 20-year period 2019/20 to 2038/39 as per the earlier iteration.
- The first 6 years of this 20-year period would be treated as past years covering the period 2019/20 to 2024/25. As per 2023/24 the past completion figures for 2024/25 will be based off our HFR return (verified and submitted September 2025).
- The reporting year 2025/26 will be treated as a 'future year', as are all subsequent years from that point onwards.

5 YHLS Calculation update (version 3)

- The 5YHLS exercise will use a future starting year point of 1st April 2026, with the aim of satisfying the wording employed in the NPPF, which requires the council to identify a sufficient supply of deliverable sites for five years following the intended date of adoption. The

deliverable supply inputting into the calculation will be based on that identified in the version 3 trajectory for the five-year period 2026/27 to 2030/31.

- The reporting year 2025/26 is to be treated as a past year (alongside 2019/20, 2020/21, 2021/22, 2022/23, 2023/24 & 2024/25) for the purpose of this calculation. Note this departs from trajectory which treats this year (2025/26) as a future year. The predicted completion figure for this year taken from the updated trajectory is to be treated as an 'actual' completion total which will inform the shortfall calculation total.
- The continued application of a buffer is based on the confirmed HFR results for 2023/24 and 2024/25, and the predicted result for 2025/26.

The table below illustrates the different treatment of each year in the previous trajectory (version 2) and proposed updated trajectory (version 3), and the different treatment of years between the version 3 trajectory and version 3 five-year housing land supply calculation.

Year	Trajectory status – version 2 (EB73)	5YHLS calculation status – version 2 (EB73)	Trajectory status – version 3	5YHLS calculation status – version 3
2019-2020	Past	Past	Past	Past
2020-2021	Past	Past	Past	Past
2021-2022	Past	Past	Past	Past
2022-2023	Past	Past	Past	Past
2023-2024	Past	Past	Past	Past
2024-2025	Future	Future	Past	Past
2025-2026	Future	Future	Future	Past
2026-2027	Future	Future	Future	Future
2027-2028	Future	Future	Future	Future
2028-2029	Future	Future	Future	Future
2029-2030	Future	-	Future	Future
2030-2031	Future	-	Future	Future
2031-2032	Future	-	Future	-
2032-2033	Future	-	Future	-
2033-2034	Future	-	Future	-
2034-2035	Future	-	Future	-
2035-2036	Future	-	Future	-
2036-2037	Future	-	Future	-
2037-2038	Future	-	Future	-
2038-2039	Future	-	Future	-