

2026

Development Strategy Final Proposals October 2010

Background Paper 2: Housing

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1 – Executive Summary

- 1.1 This document forms part of the background evidence base, which has informed the preparation of Ealing’s Development Strategy DPD: Final Proposals (September 2010) which spans a 15-year Plan Period (2011-2026).
- 1.2 Population in the Borough is expected to grow from 323,100 to 347,000 in 2026, and the number of households increasing from 127,400 to 142,500 in 2026. Although 90% of housing requirements will be met through existing stock turnover, there is a significant shortfall of affordable housing which outstrips targets for all new housing.
- 1.3 Housing targets for Ealing are being reviewed as part of the emerging Draft Replacement London Plan (RLP, October 2009) and its Examination in Public (EiP). These are being informed by Strategic Housing Market Assessments (SHMAs) and a London-wide Strategic Housing Land Availability Assessment (SHLAA). RLP figures for Ealing suggest an annual target of **890 per year**, roughly equating to a 15-year target (2011-2026) of **13,350**. The SHLAA suggests a total capacity for Ealing of **9,379** over a 10-year period, roughly equating to a 15-year target (2011-2026) of **14,070**.
- 1.4 Although the Government has announced the revocation of housing supply targets for the regions outside of London, the Mayor of London has supported the continued retention of Londonwide housing targets, and thus the RLP targets will be used for the purpose of rolling forward targets for LDFs. However, the Mayor has announced his intention to work with Boroughs and other stakeholders in the medium-long term to develop and implement a new approach that supports his strategic responsibilities and priorities for managing and coordinating sustainable housing growth in London, but also takes a more bottom-up, participative and consensual approach.
- 1.5 The Development Strategy / Sites DPDs suggest that **74%** of identified housing supply can be met in the Uxbridge Road / Crossrail Corridor, **25%** can be met in the A40 Corridor and **2%** outside these Corridors (figures rounded).
- 1.6 With provision for approximately **12,200** residential units demonstrated in the Development Strategy / Sites DPDs and **3,255** Small Sites capacity identified in the SHLAA, a total of **15,455** units is reached which exceeds the Development Strategy’s target of **14,000** by **1,455**. This equates to just **97** units per year.

2 – Introduction

- 2.1 This document forms part of the background evidence base, which has informed the preparation of Ealing's **Development Strategy DPD: Final Proposals (September 2010)** within its Local Development Framework (LDF). The Development Strategy sets out a vision of how Ealing should develop during the 15-year Plan Period 2011-2026 ('the Plan Period'), considering how the Borough fits into the 'bigger picture' of London. It considers different places within Ealing, and how they should change over the years ahead, where development should be focused, and what we should protect.
- 2.2 This background paper on housing is a key part of the evidence base. It provides an overview of projected change in the Borough, reflecting further evidence on population estimates as well as demand and need for different types of housing. Importantly, it demonstrates how the Council can meet this demand, through sites specified in Ealing's **Development Sites DPD: Initial Proposals (September 2010)**, which are suitable for, and have the potential to deliver, new housing in the Borough during the Plan Period.
- 2.3 This level of forward, spatial planning, is essential to meet the requirements of Government guidance set out in Planning Policy Statement 3 (PPS3) Housing (June 2010). PPS3 requires the Council to provide a 15-year trajectory of developable housing supply based around identified sites. Specific emphasis is based on the first 5 years of the LDF to ensure there are sufficient deliverable sites in the Borough to meet housing demand during this period. Furthermore, this evidence base demonstrates how the Borough will continue to meet housing targets established by the Greater London Authority (GLA) in its emerging **Draft Replacement London Plan (RLP, October 2009)** and subsequent changes through the Examination in Public (EiP) process, which is currently ongoing.
- 2.4 Although the Development Strategy is anticipated to be formally adopted in 2011, the current economic circumstances and volatility in the housing market has meant it is prudent for the Council to provide a realistic assessment of risk in bringing forward housing sites in the Borough. This is incorporated in the analysis contained within this paper and will be continually monitored through the Council's Annual Monitoring Report (AMR).

2.5 A recent report by Shelter, *The Human Cost: How the Lack of Affordable Housing Impacts on All Aspects of Life* (April 2010), considers how the lack of affordable housing supply impacts on many aspects of life in the UK. Its key findings include:

- 21% of 18-44 year olds without children (2.8 million) admit they are delaying starting a family because of a lack of affordable housing.
- 22% of 18-34 year olds (2.9 million) live with their parents. Of this group, 58% report that developing and maintaining relationships is harder because of their living situation.
- 28% of people (13.1 million) have reduced the amount they spend on food to help pay their housing costs.
- 12% of people (5.6 million) report that high housing costs have affected their ability to move for work.
- 13% (6.1 million) have resorted to sometimes borrowing on a credit card to help pay for housing costs.
- 38% of people (17.8 million) believe that their children or future children will not be able to afford a decent home.
- 18% of people who plan to become a homeowner in the future believe they will need 10 years or more to save for a deposit.
- 50% of renters do not believe that they will ever be able to afford to buy a home in their local area.
- 44% of people (20.6 million) believe that in relation to housing, the next Government should prioritise the supply of affordable homes.

3 – Demography, Housing Need and Demand

3.1 Background Paper 1: Demography (October 2010, LBE)

3.1.1 The Borough will continue to experience increased demand for a range of new housing over the Plan Period. Background Paper 1 provides an overview of future population and household estimates and projections in the Borough. These population and household estimates are summarised in Table A.

Table A: Population and Households change in Ealing 2011-2026

	Current	Change	Change (%)	2026
Population	323,100	+23,900	+7.4%	347,000
Households	127,400	+15,100	+11.8%	142,500

3.2 Ealing Strategic Housing Market and Needs Assessment (SHMA, September 2009, LBE/DCA)

3.2.1 The Ealing Strategic Housing Market and Needs Assessment ('the SHMAA') provides the most up-to-date overview of housing need and demand, and its data will remain valid until 2014. The SHMA indicates a level of self-containment within the Borough's housing market with a link between household movements and commuting patterns to the neighbouring Boroughs of Hillingdon and Hounslow. The SHMA indicates that 90% of all housing requirements in the Borough will be met through turnover of the existing stock.

3.2.2 However, section 1.9.5 of the SHMA indicates that there is a significant shortfall of affordable housing in the Borough which outstrips targets and projections for all new housing.

- 3.2.3 Furthermore, the SHMA indicates that current housing stock under-provides for larger units (3 and 4 bedrooms) whilst there will be a continued demand for smaller units (1 and 2 bedrooms) during the Plan Period. This reflects demand as well as identified concerns of overcrowding and need for people with supported needs (disabilities and long-term illness) and demand from a significant predicted increase in people aged 65+ living in the Borough.
- 3.2.4 It is the recommendation of the SHMA that the Council review the current target of 50% affordable housing, acknowledging continued issues of development viability in the short to medium-term, balanced against the need for further affordable accommodation to be developed in the Borough. In response, the Council has formally reviewed this through work on an Affordable Housing Viability Study (to be published towards the end of 2010) and the 50% target has been retained in the Development Strategy.

3.3 West London SHMA (emerging, ORS) and the Greater London SHMA (April 2009, ORS)

- 3.3.1 A sub-regional West London SHMA (emerging) is currently being produced and is expected to be published for stakeholder consultation in late 2010 for completion in spring 2011. A SHMA for Greater London was also published in April 2009.
- 3.3.2 This approach of SHMAs being produced at both the regional and sub-regional scale is supported in the short-term as stated in Annex 2 of The London Plan Interim Housing Supplementary Planning Guidance (SPG, April 2010, GLA). A more long term approach will involve consideration of a single, London-wide SHMA that fully addresses regional and local needs.

4 – Housing Supply

4.1 Introduction

- 4.1.1 The current adopted London Plan (see 4.2) provides housing supply targets for Ealing. However, this is currently being reviewed in light of the Greater London SHMAA (3.3), a London-wide Strategic Housing Land Availability Assessment (SHLAA – see 4.3) and other evidence base documents to inform the Replacement London Plan (RLP – 4.4). Accordingly, Ealing’s 2026 Development Strategy (4.5) sets on overall target for **14,000** additional dwellings over the Plan Period.
- 4.1.2 Table B summarises the figures from these various documents and provides extrapolated 15-year targets for comparison. Each of these individual documents will be considered in turn in this chapter. Ealing’s Development Sites DPD will also be considered which details a number of sites which can contribute towards delivering these housing supply targets.

4.2 The London Plan (Consolidated with Alterations since 2004) (February 2008, GLA)

- 4.2.1 Table 3A.1 of the Consolidated London Plan stipulates additional homes targets for Ealing with a 10 year target (2007/8-2016/7) of **9,150**, equating to an annual target of **915 per year**, which roughly equates to **13,725** over the Development Strategy Plan Period.
- 4.2.2 The Consolidated London Plan is currently being reviewed, however, and will be informed, in part, by the London SHMAA and SHLAA which are considered next.

Table B: Ealing's Housing Targets

	Document	Annual Target	10-Year Target (2011-2021)	15-Year Target (2011-2026)
(a)	Consolidated London Plan Table 3A.1	915	9,150 (2007/8-2016/17)	13,725
(b)	SHLAA Large Sites Table 4.3 / 4.12	673	6,739	10,095
(c)	SHLAA Small Sites Table 4.6 / 4.12	217	2,170	3,255
(d)	Replacement London Plan Table 3.1 = (b) + (c)	890	8,900	13,350
(e)	SHLAA Non-Self Contained Capacity Table 4.9 / 4.12	0	0	0
(f)	SHLAA Vacants Returning to Use Table 4.9 / 4.12	47	470	705
(g)	SHLAA Total Capacity Table 4.12	938	9,379	14,070
(h)	Development Strategy Spatial Vision 1.1	933	9,333	14,000
(i)	Development Strategy / Sites See 4.5 below	N/A	N/A	12,200
(j)	Development Strategy / Sites + Small Sites = (c) + (i)	N/A	N/A	15,455
(k)	Initial Overprovision to be further tested = (j) – (h)	97	N/A	+1,455

Original figures

Extrapolated figures

4.3 The London Strategic Housing Land Availability Assessment (SHLAA) and Housing Capacity Study (HCS) (October 2009)

4.3.1 Government guidance in PPS3 requires all local planning authorities to prepare, monitor and update a SHLAA to demonstrate a 'deliverable' supply of housing sites in the first 5 years of their Core (Development) Strategy with a further 10 years of 'developable' sites to be identified, providing an overall 15-year trajectory of potential supply. The Department for Communities and Local Government (DCLG)'s SHLAAs Practice Guidance (July 2007) provides guidance on how this should be done.

4.3.2 The London Strategic Housing Land Availability Assessment and Housing Capacity Study ('the SHLAA') process generated these figures for London and each individual Borough. The Council has worked with the GLA in informing the SHLAA evidence base.

4.3.3 A full range of sources of potential were assessed through the SHLAA process, including sites:

- With current planning permissions;
- With current planning applications;
- Subject to ongoing pre-application discussions;
- With Development Plan designations;
- Identified in regeneration frameworks;
- As part of housing estate regeneration programmes; and
- Suggested by landowners / developers through the SHLAA's 'call for sites'.

- 4.3.4 Approximately 400 sites were identified in the Borough as part of this process. Given its London context, the majority of sites identified fall on previously developed land.
- 4.3.5 Each of the sites identified has been subjected to a rigorous process of suitability testing. The testing has assessed policy and physical constraints of each site, which would affect the suitability of bringing forward residential development in that location. This process has reduced the number of 'suitable' sites with potential to deliver housing during the Plan Period.
- 4.3.6 The SHLAA process enabled a capacity figure to be assigned to each potential site using information from planning application histories and Development Plan allocations, or where these do not exist, making a judgement on the sites' context with regard to Public Transport Accessibility Levels (PTALs) and the London Plan residential density matrix.
- 4.3.7 This constrained assessment has informed the site-by-site potential capacity figures agreed with the GLA and the generation of the RLP and 10-year housing targets.
- 4.3.8 A distinction was made between 'Large' and 'Small' sites. 'Large' sites were those generally above the size threshold of 0.25 ha with approval (i.e. planning permission), allocations (i.e. planned for) and/or potential (i.e. for residential use). Tables 4.3 and 4.12 of the SHLAA suggest **Large Sites** capacity for Ealing with a 10-year target (2011-2021) of **6,739**, equating to an annual target of **673 per year**, which roughly equates to **10,095** over the Plan Period.
- 4.3.9 Projections for 'Small' sites are also made using information on sites less than 0.25 ha, previous rates of delivery, levels of empty homes brought back into use and non-self contained (hostel, nursing and student) accommodation. The annual rate has been calculated to take into account recent trends, extrapolate and pro rata data, and allow for factors such as the current economic situation. Tables 4.6 and 4.12 of the SHLAA suggest **Small Sites** capacity for Ealing with a 10-year target (2011-2021) of **2,170**, equating to an annual target of **217 per year**, which roughly equates to **3,255** over the Plan Period.
- 4.3.10 The detailed methodology for this process can be found in Chapter 3 of the SHLAA.

4.4 The London Plan (Consultation Draft Replacement Plan) (2011-2021) (RLP October 2009)

- 4.4.1 Table 3.1 of the RLP stipulates additional homes targets for Ealing with an annual target of **890 per year**, equating to a 10-year target (2011-2021) of **8,900**, which roughly equates to **13,350** over the Plan Period.
- 4.4.2 The Secretary of State for Communities and Local Government announced on the 6th July 2010 that Regional Strategies (outside of London) will be revoked, as set out in the Coalition Agreement. He has made clear that the Government will introduce a new planning system that will be clear, efficient and will put greater power in the hands of local people, rather than regional bodies. In London the London Plan will continue to provide the planning framework for London Boroughs. As part of a wider process of decentralisation in London, Government is reviewing how powers and discretion can be shifted downwards to the Mayor and Assembly, to London Boroughs and to local neighbourhoods. This will include reviewing the scope for devolving power from the Greater London Authority to the Boroughs and below. While Government considers that requirements relating to the London Plan (e.g. requiring targets to be set), no longer apply, if the Mayor chooses to propose targets on particular matters, this will be a matter for him and London partners to consider.
- 4.4.3 In light of this announcement, a Statement to the EiP on behalf of the Mayor of London was made on 20th July 2010, which included a statement on RLP Policy 3.3 Housing Supply:

The Mayor has considered the need to retain Londonwide housing provision monitoring targets particularly carefully. He has come to the conclusion that because of the Mayor's particular strategic responsibilities and priorities for managing and coordinating housing growth sustainably in London, and the importance of housing supply to London as a whole and to the delivery of the whole range of economic, social and environmental priorities, he supports their continued retention. London is generally accepted to be a single housing market area, with borough boundaries having little relevance to housing market issues. Planning for housing in London is therefore more than a local issue, and the Mayor considers that this supports a strategic, citywide approach – particularly given his statutory strategic housing responsibilities.

He is strengthened in this view by the fact that the current targets have been prepared in close partnership with the Boroughs and other stakeholders through the preparation of both the Strategic Housing Market Assessment and the Strategic Housing Land Availability Assessment.

Having said all this, the Mayor is convinced that now the Government has removed the highly prescriptive requirements about how targets should be drawn up and tested, there are better and more inclusive ways of preparing the next round of targets that better reflect the particular needs and circumstances of London. Over the next two years or so, he will work with Boroughs and other stakeholders to develop and implement an approach that meets these objectives, builds in a more bottom-up, participative and consensual approach and reflects the ‘resource for localism’ principle he set out in his opening speech to the EiP. This approach will be used over this period to prepare an early alteration to the Plan.

RLP EiP. Targets in the London Plan: Statement to the Examination on behalf of the Mayor of London (20th July 2010)

- 4.4.4 It is worthy of note that, in light of these announcements, and in light of the EiP process and the need for clarifications of policies, the following suggested changes have been proposed to the RLP related to Policy 3.3 on Housing Supply. New Policy 3.3 B (formerly A) now states:

Working with relevant partners, the Mayor will seek to ensure the housing need identified in paragraphs 3.14 and 3.14A is met, particularly through provision consistent with at least an annual average of 32,210 net additional homes across London.

Early suggested changes to the Replacement London Plan (May 2010) and further changes (October 2010)

- 4.4.5 Paragraph 3.19 now states:

Table 3.1 only covers the period 2011–2021. As LDFs must provide 15 year targets, LDFs which come forward following publication of this Plan and before its replacement or alteration will not be covered for their full term by the current targets. The Mayor therefore commits to revising the targets by 2015/16... In order to provide guidance for any intervening period, LDFs should roll forward the annual targets in Table 3.1, expressing the rolling target as an indicative figure to be checked and adjusted against any revised housing targets.

Early suggested changes to the Replacement London Plan (May 2010) and further changes (October 2010)

4.4.6 Also, a new paragraph 3.21 A has been introduced:

Following the Government's decision to remove the highly prescriptive requirements about how housing supply targets should be prepared and tested, the Mayor has announced his intention to work with boroughs and other stakeholders to develop and implement a new approach that supports his strategic responsibilities and priorities for managing and coordinating sustainable housing growth in London, recognises the importance of housing supply to his economic, social and environmental priorities and takes account of London's status as a single housing market, while also taking a more bottom-up, participative and consensual approach. This work will form the basis for further assessments of housing demand and supply to form the basis for early alterations to this Plan. This approach will also enable the Mayor to respond to likely short-term volatility in demographic trends and the housing market and other sources of uncertainty early in the period covered by this Plan.

Suggested further changes to the Replacement London Plan (October 2010)

4.5 Development Strategy DPD: Final Proposals (September 2010)

- 4.5.1 The Development Strategy sets out a broad spatial framework guiding where such housing provision should be directed, predominantly along the two identified Corridors: the Uxbridge Road / Crossrail Corridor; and the A40 Corridor.
- 4.5.2 Section 1.1 of the Development Strategy sets out the 'Spatial Vision for Ealing' which includes the provision of **14,000** additional homes over the Plan Period.
- 4.5.3 The Development Strategy refers to some key sites where housing provision can be achieved. The Development Sites DPD provides further detail on these and many other sites which can contribute towards the delivery of additional homes.
- 4.5.4 The vast majority of housing sites and their quantum in the Development Sites DPD are sourced from the SHLAA (4.3). Figures for potential net residential units have been further tested and are proposed as maxima in seeking consultees' views at this Initial Proposals stage in the consultation.

- 4.5.5 The Development Sites are divided into ‘Main’ and ‘Extra’ (‘X’) sites. The options proposed for Extra sites are less elaborate than for the Main sites and do not necessarily represent the council’s current policy stance, being based mainly on SHLAA findings and not necessarily wider council objectives. Nevertheless, these Extra sites are presented to seek consultees’ views at an early stage in the formulation of the planning policies.
- 4.5.6 Page 11 (and Appendix 3) of the Development Strategy provides a breakdown of the approximate locations where new homes could be delivered across each of the 8 Neighbourhoods and within and outside of the 2 Corridors in the Borough. Further work on refining these figures in light of the residential quantum outlined in the Development Sites DPD has been carried out, and the revised information is provided in Table C and D and Figures A and B below. Note that these figures include only ‘Main’ sites and quantum and percentages have been rounded.
- 4.5.7 The Development Strategy / Sites DPDs suggest that **74%** of identified housing supply can be met in the Uxbridge Road / Crossrail Corridor, **25%** can be met in the A40 Corridor and **2%** outside these Corridors (figures rounded).

Table C: Housing potential from Development Sites by Neighbourhood

Development Strategy DPD		Units	%
(Appendix 3) Neighbourhood Profiles	(3.1) Acton	2,000	16%
	(3.2) Ealing	3,300	27%
	(3.3) Greenford	490	4%
	(3.4) Hanwell	280	2%
	(3.5) Northolt	330	3%
	(3.6) Park Royal	1,500	12%
	(3.7) Perivale	0	0%
	(3.8) Southall	4,300	35%
Total		12,200	100%

Table D: Housing potential from Development Sites by Corridor

Development Strategy DPD		Units	%	
(2.1) Uxbridge Road / Crossrail Corridor	(2.2) Acton Town Centre	525	9,000	74%
	(2.3) South Acton Estate	862		
	(2.5) Ealing Town Centre	2,600		
	(2.6) Green Man Lane Estate	242		
	(2.7) Hanwell Town Centre	70		
	(2.8) Southall Town Centre (including Southall Gas Works)	3,300		
	(2.9) Havelock Estate	193		
	Other Development Sites in Corridor not specified in Development Strategy	1,200		
(3.1) A40 Corridor	(3.4) Southern Gateway	1,500	3,000	25%
	(3.5) Greenford Town Centre	125		
	Other Development Sites in Corridor not specified in Development Strategy	1,400		
(4.1) Outside the Corridors (Hinterlands)		200	2%	
Total		12,200	100%	

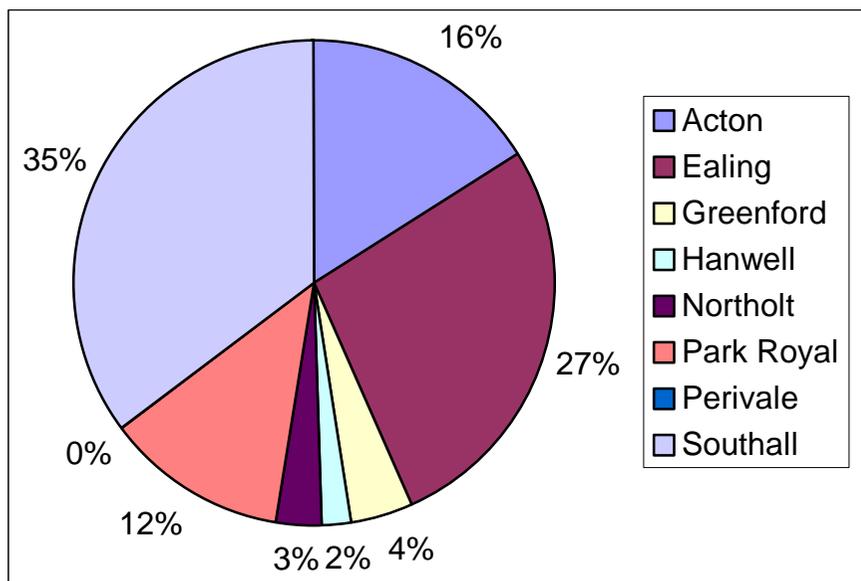


Figure A: Housing potential from Development Sites by Neighbourhood

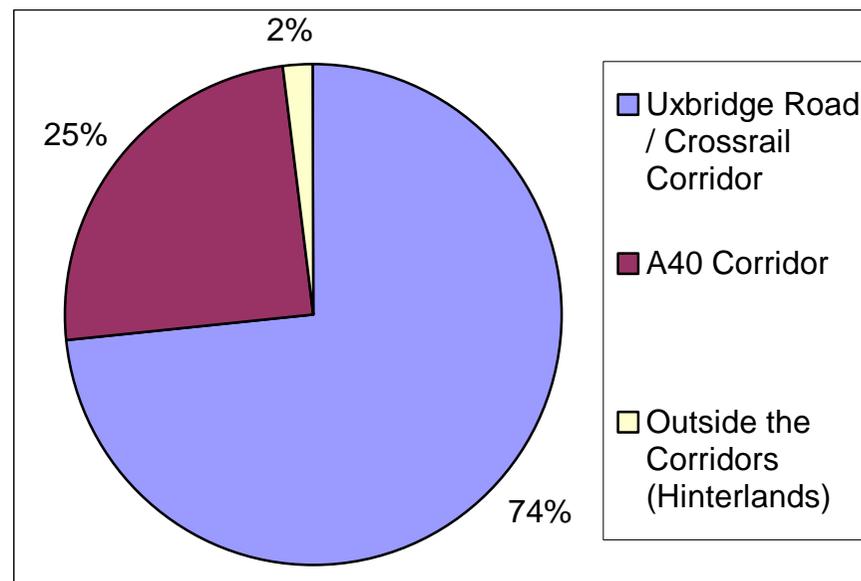


Figure B: Housing potential from Development Sites by Corridor

4.5.8 The Council is confident that development will be brought forward on these sites. The position will continue to be monitored through the AMR process. If the monitoring process reveals that actual supply is subsequently forecast to be significantly lower than planned, the Council will respond with appropriate actions, such as:

- Site-by-site assessment of supply/viability problems and opportunities for support to assist with site planning, designation, assembly and delivery;
- Comparison of performance in neighbouring West London authorities to determine if problems are sub-regional and require a strategic response;

- Opportunities to bring forward supply from sites identified later in the housing trajectory, particularly those with Council / public sector ownership or financial backing;
- Opportunities to increase supply from smaller, less complicated sites; and
- Review of the assumptions contained within the SHMA, SHLAA and housing supplied presented in this paper.

4.5.9 With provision for approximately **12,200** residential units demonstrated in the Development Strategy / Sites DPDs and **3,255** Small Sites capacity identified in the SHLAA, a total of **15,455** units is reached which exceeds the Development Strategy's target of **14,000** by **1,455**. This equates to just **97** units per year (Table B). This shows that there is some slack in the portfolio of Development Sites and these quantum will be further tested through work on the Development Sites and the current public consultation process.

4.6 Further Housing Supply Information

4.6.1 Further housing supply information is to be included in future iterations of this document, namely, within the emerging AMR (December 2010) and a technical paper for the examination of the Development Strategy in 2011. This further information is likely to include more detail on:

- Housing Trajectory (including 5-, 10-, 15- and 20-year supply periods); and
- Affordable Housing.

5 – Contact Details

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