Housing Needs and Land Supply Evidence

Final Report

Iceni Projects Limited on behalf of

Shall Do Hayes Developments Ltd

October 2025

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1. Introduction

1.1 This report has been prepared to support the planning application submitted to the London Borough of Hillingdon ('the Council') for the partial demolition of the existing multistorey car park and construction of a new 4 storey residential development providing 52 new homes (Class C3) at Hayes Park West, Hayes Park, Uxbridge, UB4 8FE. The description of the proposed development is for:

> "Partial demolition and redevelopment of the existing multi storey car park to provide new homes (Use Class C3), landscaping, car and cycle parking, and other associated works."

1.2 The proposed development provides the opportunity to make sustainable use of a redundant, disused car park, and deliver a high-quality residential development that can enhance the setting of the adjacent listed buildings. It includes the provision of a high proportion of family homes, which is a significant planning benefit that directly addresses the Council's priority housing need as considered in this report.

An Evolving Development Context

1.3 Hayes Park West ('the site') is located within the Charville Ward within LB Hillingdon. The site sits within a wider former business park known as 'Hayes Park'.

1.4 The Hayes Park estate comprises a historically significant office campus in West London, situated in Hayes, and bounded by a structured, pastoral landscape. The estate is framed by the buildings known as Hayes Park North ('HPN'), Hayes Park Central ('HPC'), and Hayes Park South ('HPS'), both positioned within a broader landscape setting originally envisaged by architect Gordon Bunshaft as a modernist business park set in parkland. HPC and HPS are Grade II* listed due to their architectural and historic interest.

1.5 In recent years, the character and context of Hayes Park estate has undergone a fundamental shift from office use to residential which, following a series of planning applications, is delivering 189 new homes. The relevant applications are as follows:

- Hayes Park North ('HPN') – a three-storey, early 2000s office building, was granted Prior Approval in 2022 for conversion to 64 homes (Ref: 12853/APP/2021/2202), followed by permission for external enhancements to the building (Ref: 12853/APP/2023/3720). These works are now on-site and being delivered.

- Hayes Park Central ('HPC') and Hayes Park South ('HPS') – both mid-century, listed office buildings, were granted full planning permission and listed building consent in early 2024 for conversion into 125 homes, with associated landscape enhancements (Ref: 12853/APP/2023/1492).

1.6 The proposed development envisages the partial demolition of the existing multi-storey car park which was designed to service the former office use of the site. Hayes Park West is bound to the north and west by dense trees planting and open parkland, which is private land owned by the Church Commissioners. To the east the site is bound by HPN, and to the south by the listed HPC and HPS.

Planning Policy Position

1.7 The statutory Development Plan for the London Borough of Hillingdon, and in turn the proposed development, consists of:

- The London Plan (2021);

- The London Borough of Hillingdon Local Plan Part One (2012);

- The London Borough of Hillingdon Local Plan Part Two (2020);

- The London Borough of Hillingdon Part 2 Site Allocations and Designations (2020);

- The West London Waste Plan (2015); and

- The London Borough of Hillingdon Local Plan Part One (2012).

1.8 The site is located within the Green Belt, as shown on the Council's Policies Map. There are no other site-specific or land use policy designations on the site. The site does not form part of a Green Chain.

1.9 The assessment of the development against policies in the development plan is included within the Planning Statement. This identifies that national policies set out in the National Planning Policy Framework ('NPPF') are an important material consideration in the determination of the application.

1.10 NPPF Para 154 sets out a number of exceptions where development within the Green Belt is 'not inappropriate.' This includes, in sub-paragraph g), limited infilling or the partial or complete development of previously developed land, whether redundant or in continuing use, which would not cause substantial harm to the openness of the Green Belt. It is considered that the proposed development accords with this, and is therefore not inappropriate.

1.11 It is not therefore necessary to demonstrate 'Very Special Circumstances' (VSCs) to justify the development. Nonetheless, the housing need and housing land supply position, as considered in this report, are relevant to the weight to be attributed to key benefits of the development in the planning balance.

1.12 The NPPF also sets out 'Golden Rules' related to major development including the provision of housing on sites in the Green Belt, such as this. The alignment of the development proposals with the Golden Rules is principally considered in the Viability Report submitted with the planning application, together with the Planning Statement.

Purpose and Structure of this Report

1.13 The purpose of this report is to address the need for housing and the housing land supply position. It demonstrates an acute and urgent need to bring forward additional housing in the context of a long-standing failure to deliver sufficient housing to meet housing need and support London's economy and a declining trajectory for housing delivery in the Borough and the Capital. It shows that Hillingdon is not able to demonstrate a five year housing land supply with a significant and growing housing supply shortfall.

1.14 The report also considers the mix of housing proposed on the site and shows that there are significant benefits which can be expected to accrue from the delivery of family-sized homes to meet a clear identified local need and weak delivery.

1.15 The remainder of this report is thus structure to address:

- Section 2: Overall Housing Delivery;
- Section 3: Five Year Housing Land Supply;
- Section 4: Housing Mix Justification; and
- Section 5: Conclusions and Summary

2. Housing Need and Delivery

2.1 In this section we consider the need for housing and appraise housing delivery performance against this.

Overall Need

Standard Method Housing Need

2.2 The NPPF and Standard Method were amended in December 2024, and sets out how housing need for different local authorities should be calculated. The revised standard method is calculated with a two-step process:

- **Step one** sets a baseline level of housing by 0.8% growth in housing stock per year using the latest data on the housing stock in MHCLG Live Table 125.

- **Step two** is an affordability uplift, which is applied to the baseline, and which is calculated using the average median workplace-based affordability ratio results over the last five years, which are applied to the formula below to calculate an affordability adjustment factor. This is applied to the Step 1 baseline.

$$\textbf{Adjustment Factor} = \frac{\textbf{Affordability Ratio} - \textbf{5}}{\textbf{5}} \times \textbf{0.95} + \textbf{1}$$

2.3 An overall London-wide standard method housing need can be calculated by adding the housing need results for each of London's boroughs. This calculation is performed in the table below, and results in **a Standard Method housing need for London of 86,082 dwellings per annum (dpa).**

Table 2.1 Standard method housing calculation for London

Borough	Total housing stock (2024)	Step 1: Annual dwelling stock increase (0.8%)	Average affordability ratio (2020 – 2024)	Adjustment factor	Step 2: Housing need
Barking and Dagenham	80,378	643	10.54	205%	1,320
Barnet	162,868	1,303	16.26	314%	4,090
Bexley	101,291	810	11.88	231%	1,870
Brent	134,587	1,077	14.45	280%	3,010
Bromley	142,770	1,142	13.13	254%	2,906
Camden	109,741	878	18.08	349%	3,060
Croydon	169,386	1,355	10.86	211%	2,864
Ealing	146,473	1,172	14.61	283%	3,311
Enfield	130,419	1,043	13.23	256%	2,675
Greenwich	124,320	995	12.96	251%	2,499
Hackney	119,131	953	14.42	279%	2,659
Hammersmith and Fulham	98,068	785	18.31	353%	2,769
Haringey	116,923	935	15.93	308%	2,878
Harrow	96,633	773	15.38	297%	2,298
Havering	108,838	871	11.47	223%	1,941
Hillingdon	117,858	943	12.49	242%	2,285
Hounslow	112,325	899	11.81	229%	2,061
Islington	108,700	870	14.52	281%	2,443
Kensington and Chelsea	89,936	719	34.54	661%	4,758
Kingston upon Thames	70,527	564	14.37	278%	1,569

Borough	Total housing stock (2024)	Step 1: Annual dwelling stock increase (0.8%)	Average affordability ratio (2020 – 2024)	Adjustment factor	Step 2: Housing need
Lambeth	147,867	1,183	14.07	272%	3,221
Lewisham	132,584	1,061	12.47	242%	2,566
Merton	88,359	707	15.07	291%	2,059
Newham	133,238	1,066	11.10	216%	2,301
Redbridge	108,336	867	14.17	274%	2,377
Richmond upon Thames	86,049	688	18.79	362%	2,492
Southwark	146,562	1,172	12.45	242%	2,832
Sutton	86,628	693	12.21	237%	1,642
Tower Hamlets	142,331	1,139	9.56	187%	2,125
Waltham Forest	111,318	891	14.47	280%	2,493
Wandsworth	157,230	1,258	18.16	350%	4,403
Westminster	132,895	1,063	21.05	405%	4,305
Total	**3,814,569**				**86,082**

Source: Planning Practice Guidance/ Iceni Projects

2.4 This figure is slightly different to the one initially calculated by Government in December 2024 when the revised Standard Method was introduced. The difference is that our calculation above reflects the latest stock data (published in April 2025) and in particular the latest affordability ratio data (published in March 2025). The table above thus shows the up-to-date position at the time of writing[1].

Current London Plan target

2.5 The current 2021 London Plan sets a housing target of 522,870 dwellings across the ten year plan period of 2019/20 – 2028/29. This is equivalent to 52,287 dwellings per annum (dpa). This target, and the targets in previous London Plans, is a capacity based target.

2.6 By comparison, London's housing need was determined (using the methodology in the 2012 NPPF and associated PPG) to be around 66,000 homes per year in the 2017 GLA Strategic Housing Market Assessment (SHMA), the most up to date housing need evidence at the time of submission of the current London Plan. The shortfall in the London Plan's requirement against the housing need particularly reflected what the Examining Panel found to be overly optimistic assumptions on the contribution to supply from small sites.

2.7 As a result the current London Plan failed to meet London's housing needs 'by some margin'[2] – an issue which was of a major concern to the Panel examining the Plan.[3] It advised that Boroughs would need to use all the tools at their disposal to ensure homes are built. But the Panel also advised that:

"*from the evidence we heard the inescapable conclusion is that if London's development needs are to be met in the future then a review*

[1] The PPG is clear that LPAs will need to keep the standard method figure under review and take into account changes to the figure – see ID 2a-008-20241212 and ID 2a-009-20241212

[2] Panel Report Para 175

[3] Panel Report Para 177

of the Green Belt should be undertaken to at least establish any potential for sustainable development. Therefore we recommend that this Plan include a commitment to a Green Belt review [PR35]. This would best be done as part of the next London Plan."

2.8 It is highly relevant therefore that the Panel of Inspectors examining the London Plan found that the release of Green Belt land was required to meet London's housing needs.

2.9 The then Secretary of State in March 2020 simultaneously criticised the gap in housing supply in the London Plan and implications in terms of worsening affordability for renters and buyers, in efforts to tackle homelessness and rough sleeping and harming London's economy success. He issued directions (relating particularly to densities, small sites, housing mix and industrial land) before allowing publication[4].

2.10 As a result, the current London Plan sets a housing target which falls short of the identified need by around 13,700 dpa or 137,130 homes over the plan period.

2.11 It is also relevant that the evidence now points to a significantly greater scale of housing need, with the December 2024 Standard Method housing need for London, at 86,000 homes a year, 64% (or around 34,000 dwellings) higher than the London Plan target on an annual basis.

2.12 These factors emphasise the urgent need to boost housing delivery.

Previous London Plan targets

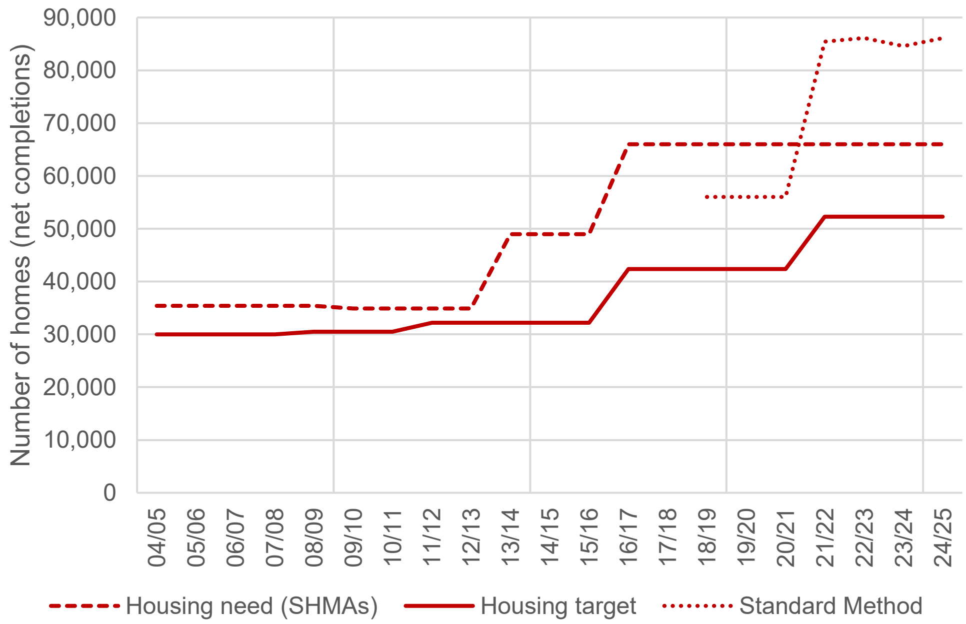
2.13 There is however a long-standing history of significant housing under-delivery in the Capital. As well as the current London Plan, all previous London Plans have failed to meet the scale of identified housing need. The assessed housing need for London has increased substantially

[4] London Plan: Letter from the Secretary of State for Housing (13 March 2020)

www.gov.uk/government/publications/london-plan-letter-from-the-secretary-of-state-for-housing from 35,400 dwellings per annum (dpa) in the 2004 GLA Housing Requirements Study, to 49,000 dpa in the 2013 SHMA then 66,000 dpa in the 2017 SHMA, and now 86,000 homes a year based on the Standard Method. While housing targets have increased in each London plan, none of them have met the level of assessed housing need.

2.14 The scale of the difference between need and targets is illustrated in the figure below, which charts the London Plan housing requirement, assessed housing need and housing delivery over time.

Figure 2.1 London Plan housing targets compared to need



Source: Iceni analysis of GLA Annual Monitoring Reports, MHCLG Live Table 122, GLA Planning London Datahub (accessed 17/9/25), London Plans, ONS *House Price to Workplace-based Earnings Ratio*

2.15 This discrepancy is the result of the contention during development and examination of multiple London plans that London is a unique housing market with constraints on potential delivery, justifying the use of a capacity-based approach to developing a housing target which is under the assessed need. This has resulted in a long-standing failure to Plan strategically to meet housing need.

2.16 The necessity of increased housing delivery in London to meet unmet need has now been recognised by the GLA. The Mayor has committed in *Towards a New London Plan*[5], a consultation document for the next London Plan, to increase housing delivery towards the level indicated by the Standard Method. Within this document, the Mayor accepts that this is the level of housing provision which should be planned for; that it requires a very significant increase in housebuilding (of over double current housing delivery rates of below 40,000 homes a year); and that to achieve this will require the review and release of Green Belt to meet housing and other development needs. It also recognises that urgent action is required to build the pipeline of consented schemes to achieve this.

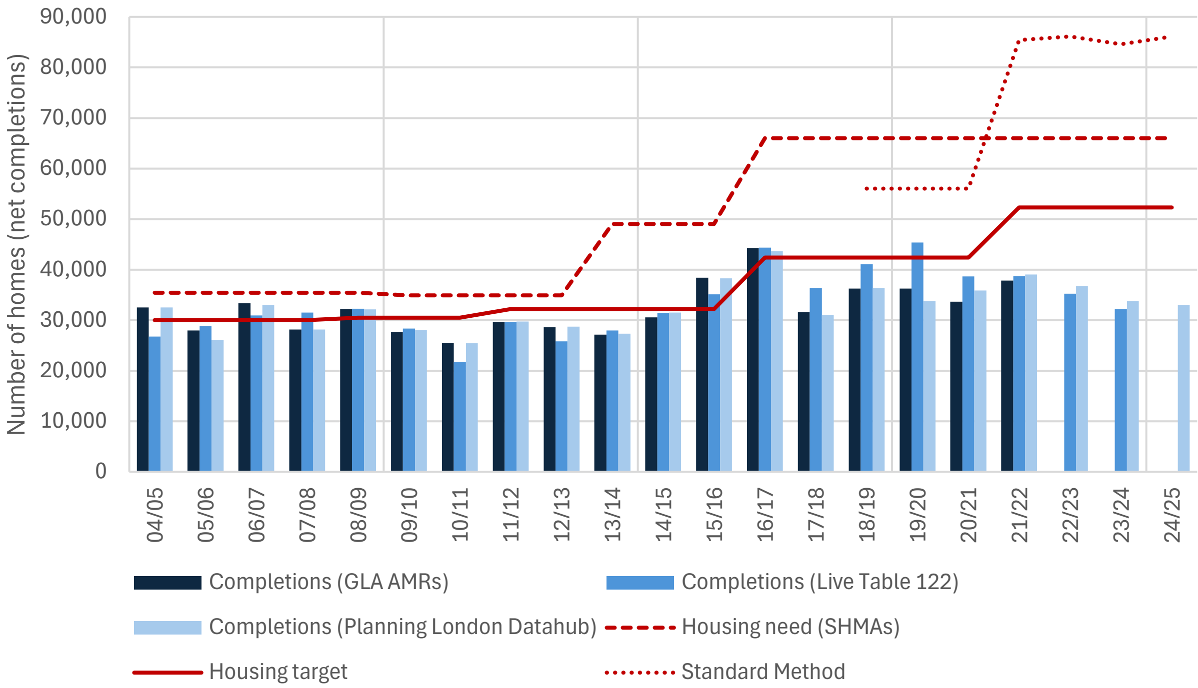
Housing delivery performance

2.17 Figure 2.2 shows three different measures of housing delivery against housing targets and needs:

- Total net additions as report in the MHCLG's Live Table 122, which is the definitive Central Government measure of housing delivery;
- Net completions as measured in the GLA's annual monitoring reports. These are more specific to the London context, and include non-self-contained homes (with a discount) and an adjustment for the number of homes becoming long-term vacant or being removed from long-term vacancy; and
- The net completions as reported on the GLA's Planning London Datahub. This is an electronic compilation of development data submitted by all London authorities, and so contains more up to date information, but is not subject to the same validation and correction as the other datasets and so should be regarded as indicative.

[5] *Towards a new London Plan* (Mayor of London, May 2025)

Figure 2.2 London Plan housing targets compared to delivery and assessed need



Source: Iceni analysis of GLA Annual Monitoring Reports, MHCLG Live Table 122, GLA Planning London Datahub (accessed 17/9/25), London Plans, ONS *House Price to Workplace-based Earnings Ratio*

2.18 This data indicates that **housing delivery in London has failed to keep pace with even the housing targets in the London plans, which are substantially below the assessed housing need**.

2.19 Since 2009/10 housing delivery has only matched targets in two years (2015/16 and a peak level of delivery in 2016/17) with 14 years where there has been a housing delivery shortfall.

2.20 In addition, delivery has been falling sharply since 2021/22, with Planning London Datahub data suggested that 2024/25 delivery will be below 30,000 homes, a level not seen since the early 2010s in the aftermath of the Great Financial Crisis (GFC). **The evidence points to a crisis in housing delivery in London.**

2.21 Combining Annual Monitoring Report (AMR) data with Planning London Datahub data in more recent years (during which AMR data is not yet available), it is estimated that housing stock in London has increased by 206,944 across the current London Plan's plan period to date (2019/20

– 2024/25). This is set against a housing target of 313,722 dwellings, and an assessed need of around 396,000 dwellings (based on 66,000 dpa). This means that **across six years there has been a shortfall of 102,432 dwellings against the London Plan's housing target, and 184,713 dwellings against the assessed need in the London Plan evidence**.

Table 2.2 Housing shortfall calculation for Greater London

Housing delivery	A	Delivery 2019/20 – 2021/22 (GLA AMR)	107,727
	B	Delivery 2022/23 – 2024/25 (Planning London Datahub)	103,560
	C	Total delivery 2019/20 – 2024/25 (C = A + B)	211,287
Housing requirement	D	Annual housing requirement	52,287
	E	Housing requirement 2019/20 – 2024/25 (E = D x 6)	313,722
Housing need	F	Annual housing need as assessed in 2017 SHMA	66,000
	G	Total housing need 2019/20 – 2024/25 (G = F x 6)	396,000
Shortfall	H	Shortfall against housing requirement (H = E – C)	102,432
	I	Shortfall against housing need (I = G – C)	184,713

Source: GLA AMRs, Planning London Datahub

Delivery Constraints

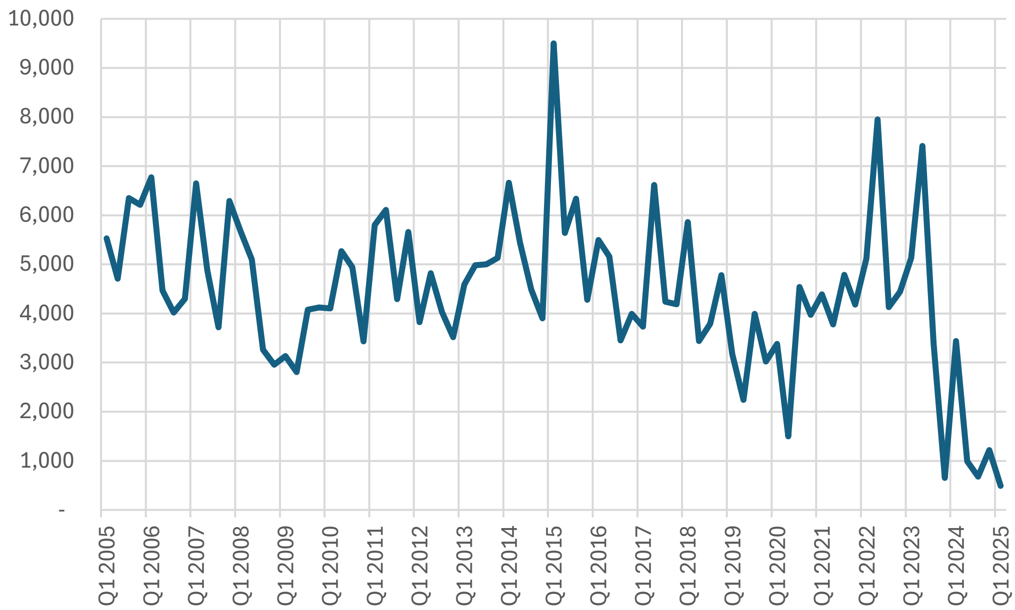
2.22 The recent fall in housing delivery in London speaks to considerable constraints on land supply and housing delivery in the Capital. This is illustrated further by data on housing starts and approvals. Housing completions generally follow these indicators, but at a lower level (as a small proportion of homes approved or stared are not completed) and with a delay (as homes are only completed some time after they are start or approved).

2.23 Housing starts across London are shown in the following figure. While there is considerable quarter to quarter variation in this data, there is a clear long-term downward trend visible from the mid-2000s onwards which contrasts directly with evidence of rising housing needs.

2.24 Starts declined through 2019 and reached a low point during COVID-19 in 2020, before recovering to above 4,000 dwellings per quarter from late 2020 to mid 2023. However, since then they have dropped substantially and in the last several quarters of data (Q2 2024 – Q1 2025) have averaged just 845 per quarter, a low point without precedents in this timeseries which stretches back to 2005.

2.25 It is thus evident that **housing starts have reached historical lows – with urgent action needed across London to boost housing delivery.**

Figure 2.3 Quarterly housing starts in Greater London



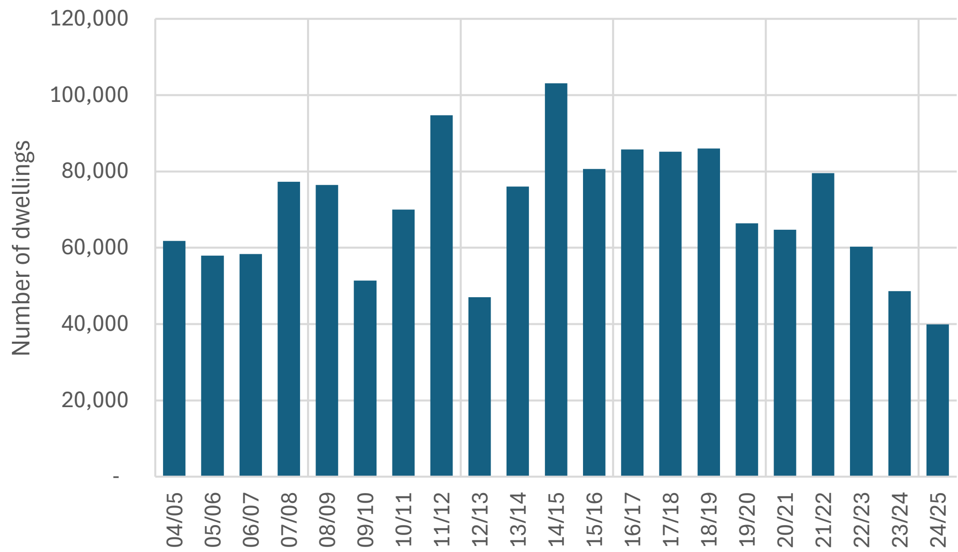
Source: MHCLG Live Table 253a

2.26 An alternative data source on larger-scale housing starts is provided Molior, which monitors developments across London with 20+ private homes. In their *Residential Development in London Q2 2025* report[6], Molior estimate that **just 2,158 private homes began construction across London in the first half of 2025, equivalent just 5% of London's housing need for 86,000 homes annually**.

2.27 According to Molior, zero starts on developments of 20 homes or more were seen in 23 London Boroughs during April, May and June., while only 9,100 private homes are forecast to complete in London during the 24 months of 2027 and 2028.

2.28 Housing approvals across London are shown in the figure below, based on development data in the GLA's Planning London Datahub. This shows that the number of homes approved has dropped every year from 2021/22 onwards. In 2024/25 approvals dropped below 40,000, a low level not previously since the inception of the GLA in 2004.

Figure 2.4 Housing approvals in London



Source: Planning London Datahub (accessed 18/9/25)

2.29 Housing approvals and starts paint a stark picture of the housing crisis in London, with these forward indicators of supply reaching historic lows. Given the lead time on larger development schemes, this means

[6] www.moliorlondon.com/media/molior-report-media-2025/02/molior_residential_development_in_london_q2_2025_v2.pdf

that housing delivery will continue to be very low across London in the next few years.

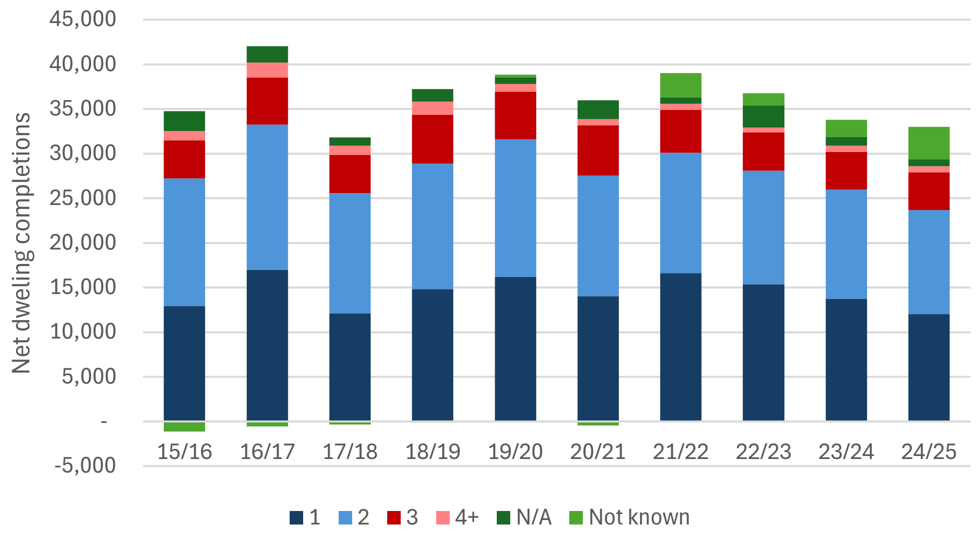
2.30 Against the context of high housing needs, London simply isn't delivering – with housing delivery rates plummeting. The evidence points to urgent action needed to boost housing supply. But at the moment, this simply isn't happening.

2.31 Housing development in London is being held back by a combination of factors including recent sharp increases in construction costs and high interest rates and finance costs, impacting viability and making many schemes financially unworkable. Changes to building safety rules, such as mandatory second staircases in taller buildings, have also add cost and uncertainty, further delaying or stalling development.

2.32 But the susceptibility of housing delivery to these factors is also partly influenced by the form of development being brought forwards, which has tended to be focused on higher-density urban schemes.

2.33 This is illustrated in the following figure, which shows housing completions in London by the number of bedrooms. Non-self-contained homes and non-permanent dwellings are classified as N/A. One and two bedroom units which are particularly common in higher-density flatted schemes dominate recent delivery. Of the permanent self-contained homes completed over this ten-year period for which the size is known, 83% have had one or two bedrooms.

Figure 2.5 Housing completions in London by number of bedrooms



Source: Planning London Datahub (accessed 25/9/25)

Hillingdon Housing Delivery

2.34 As identified in **Table 2.1**, the Standard Method housing need for Hillingdon, using the December 2024 Standard Method and up to date housing stock and affordability ratio at the time of writing, is 2,285 dpa. Prior to December 2024, the Standard Method housing need (i.e. under the previous system/ methodology) was 2,047 dpa.[7]

2.35 By comparison, the 2021 London Plan housing target for Hillingdon is 1,083 dpa. This is less than half of the Standard Method housing need, indicating that Hillingdon's current housing requirement is meeting less than half of the true level of need.

2.36 The following figure tracks Hillingdon's housing targets as set by the London Plan against housing delivery going back to 2004/5. As in the analysis of Greater London housing completions above, three housing delivery data sources are used:

[7] The standard methodology calculation was changed through revisions to the PPG alongside release of the revised NPPF by Government in December 2024

- Total net additions as report in the MHCLG's Live Table 122, which is the definitive Central Government measure of housing delivery and aligned with HDT results

- Net completions for Hillingdon as reported in the GLA's annual monitoring reports, which include non-self-contained homes (with a discount) and an adjustment for the number of homes becoming long-term vacant or being removed from long-term vacancy

- The net completions as reported on the GLA's Planning London Datahub for Hillingdon. This is an electronic compilation of development data submitted by Hillingdon to the GLA. It contains the most up to date information but is not subject to the same validation and correction as the other datasets.

2.37 Data from Hillingdon's AMRs is not included, as the most recent AMR on the Hillingdon website only contains data up to 2017/18, a year of data is not available (2013/14), and it is not clear if completions data for earlier years are consistent with GLA net completions standards (for example including changes in long-term vacant properties or being clear on how non-self-contained properties have been treated).

2.38 Housing completions have been relatively variable over time, with isolated years with unusually high levels of completion (2019/20, 2011/12 and 2012/13 for example). Otherwise, completions increased from around 500 dpa until 2010/11 to between 750 – 1,000 dpa between 2014/15 – 2021/22.

Figure 2.6 Housing targets and need for Hillingdon compared to delivery

Source: Iceni analysis of GLA Annual Monitoring Reports, MHCLG Live Table 122, GLA Planning London Datahub (accessed 17/9/25)

2.39 Until 2020/21 Hillingdon had a relatively low housing target set in London plans (for example 425 dpa in the 2012 plan and 559 dpa in the 2016 plan). Housing deliveries routinely exceeded these targets.

2.40 However, since the housing target has increased to 1,083 dpa in the 2021 London Plan, housing delivery in Hillingdon has fallen dramatically. While GLA AMR data is not available, MHCLG Live Table 122 suggests that delivery fell from 955 dwellings in 2020/21 to 723 in 2022/23 and 759 dpa in 2023/24, both well short of the London Plan housing target. Delivery appears to have fallen even further since then, with Planning London Datahub suggesting only 578 homes completed in 2024/25, the lowest level seen since 2010/11 in the wake of the GFC.

2.41 As a result, while the London Plan target has increased in the most recent plan, it is still well short of need (as evidenced by the Standard Method). Despite this, housing delivery has dropped dramatically in recent years, and is well short of even the London Plan target.

2.42 The following table quantifies the level of shortfall that has occurred across the London Plan period. Since 2019/20, the London Plan has required delivery of 6,498 dwellings in LB Hillingdon, while only 5,487 have been delivered. This results in **a substantial shortfall of 1,011 homes across six years in the Borough**.

Table 2.3 Housing shortfall calculation for LB Hillingdon

Housing delivery	A	Delivery 2019/20 – 2021/22 (GLA AMR)	3,539
	B	Delivery 2022/23 – 2024/25 (Planning London Datahub)	1,948
	C	Total delivery 2019/20 – 2024/25 (C = A + B)	5,487
Housing requirement	D	Annual housing requirement	1,083
	E	Housing requirement 2019/20 – 2024/25 (E = D x 6)	6,498
Shortfall	F	Shortfall against housing requirement (F = E – C)	1,011

Source: GLA AMRs, Planning London Datahub

Housing Delivery Test

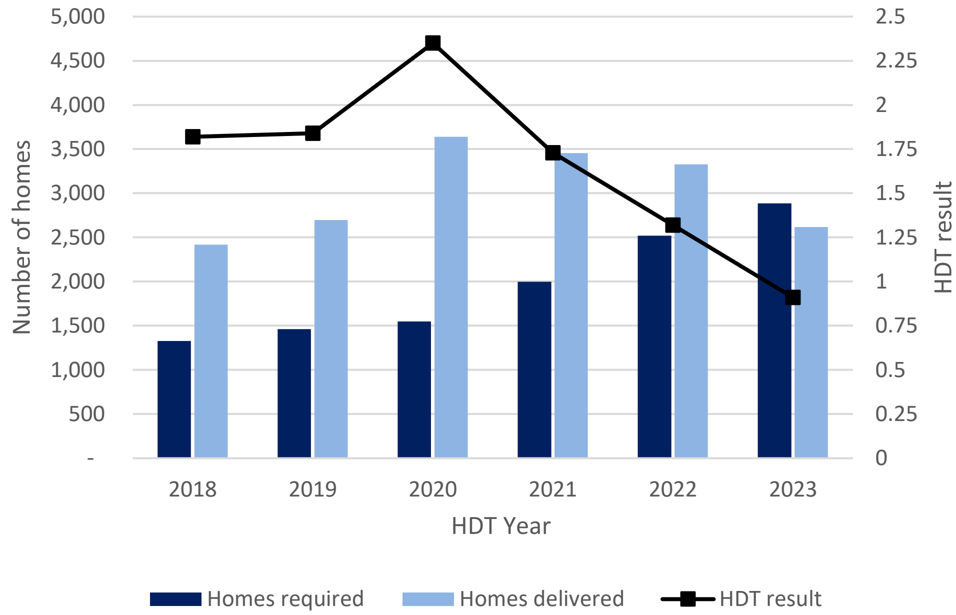
2.43 The HDT was introduced by Government following the 2017 Housing White Paper, with the aim of holding local authorities to account and introducing a mechanism to boost housing delivery.

2.44 However, there is a notable lag in how long changes in housing delivery and housing requirements filter through into HDT results. That is because the HDT averages over three previous years of data, and takes some time to be released by Central Government. As of the time of writing, the most recent HDT results (for 2023) capture housing performance and requirements across 2020/21 – 2022/23, part of which is over five years ago.

2.45 Nonetheless, the HDT illustrates the beginning of the clear decline in Hillingdon's housing delivery relative to requirements (shown more fully above). As shown in the figure below, Hillingdon's HDT result in 2023 was 91%, indicating that housing delivery was below requirements and necessitating the production of an action plan by Hillingdon Council.

2.46 The 2023 HDT result reflects a steady decline from the peak of 235% seen in 2020. This is a reflection of a steady increase in the homes required as more years of the higher 2016 and then 2021 London Plan targets are factored in. At the same time housing delivery per three year period peaked in the 2020 HDT and has decreased since.

Figure 2.7 Housing Delivery Test results for Hillingdon



Source: MHCLG *Housing Delivery Test* 2018 - 2023

2.47 Given further declines in housing delivery, as noted in the previous section, **Hillingdon's HDT scores can be expected to decline further in coming years**. Housing completions results explored earlier in this chapter can be used to predict this performance. This is shown in the following table, which predicts Hillingdon's 2024 and 2025 HDT scores. The final scores may differ slightly from these results due to revisions in the MCHLG delivery statistics and differences between the Planning London Datahub results and Central Government statistics. Nonetheless, this analysis clearly shows the direction of travel of Hillingdon's HDT.

Table 2.4 Prediction of upcoming HDT results for Hillingdon

		2024 (2021/22 – 2023/24)	2025 (2022/23 – 2024/25)
Housing required	Year 1	1,083	1,083
	Year 2	1,083	1,083
	Year 3	1,083	1,083
	Total	3,249	3,249
Housing delivered	Year 1	906[1]	745[1]
	Year 2	745[1]	759[2]
	Year 3	759[2]	578[3]
	Total	2,409	2,082
HDT Result		74%	64%

Source: 1 – 2023 HDT Results, 2 – MCHLG Live Table 122, 3 – Planning London Datahub

2.48 In 2024, **Hillingdon's HDT is likely to drop to around 74%, and in 2025 to drop further to 64%.** While these predictions indicate particularly poor HDT scores in *future* years, this is a result of *current* poor housing delivery. This illustrates the pressing need for increased housing delivery in the short term.

2.49 The expected drops in the HDT scores will have consequences under the NPPF. The 2024 score will result in either the requirement for a 20% buffer to be applied to the 5-year housing land supply under paragraph 78(b) of the NPPF if the final HDT is 75% or above, or the presumption in favour of sustainable development under paragraph 11(d) if the final HDT is below 75%. Under the 2025 score, the presumption in favour of sustainable development will apply.

2.50 The purpose of these consequences is to release additional land to boost housing delivery in cases where there is a pattern of significant housing under-delivery.

Summary

2.51 There is a crisis in housing delivery in London, with falling delivery rates and housing starts and approvals reaching historic lows.

2.52 This is in a context of a long-term trend of the London Plan setting targets below the level of assessed need. In recent years, housing delivery has failed to reach even these depressed targets. This means that across a number of years housing delivery in London has fallen below the levels needed.

2.53 Similar results are seen for Hillingdon, where housing delivery in recent years has dropped dramatically, at the same time that housing targets have increased (although to well below the level indicated by the Standard Method).

2.54 This combination of factors creates a clear and urgent need for increased housing delivery in both LB Hillingdon; and across London more broadly. While consultation material for the new London Plan has suggested that reviews of the Green Belt will unlock substantial housing supply, this is likely to be some time in the future given the lead-in time to prepare a new London Plan and then for Borough Plans to allocate sites responding to this. It does not provide an answer to the very substantial and urgent need for higher housing delivery in the short to medium term. The evidence points to a strong need to release additional land now to support housing delivery.

3. Five Year Housing Land Supply

3.1 In this section we turn to address the five year housing land supply position in LB Hillingdon based on the current evidence.

3.2 NPPF Para 78 requires local planning authorities to identify and update annually its assessment of the five year land supply position. However the Council's latest published position at the time of writing was published in March 2023 – over 2.5 years ago.

3.3 The Council thus does not have an up-to-date assessment of its five year land supply and is considered unable therefore to demonstrate a five year land supply at the current time.

3.4 The scale of a housing land supply shortfall and the actions being taken to address it are relevant to the weight to be given to the benefits of housing provision within the planning balance.[8] In this section we therefore move on to consider further the housing land supply position.

3.5 The housing land supply is a function of the requirement on the one hand; and the deliverable supply on the other. We consider each in turn. Our assessment covers the land supply over the 2025-30 period looking forwards.

Housing Requirement

Base Housing Requirement

3.6 NPPF Para 78 states that the housing land supply should be assessed against the housing requirement set out in adopted strategic policies, or

[8] See Hallam Land Management v SSCLG & Eastleigh BC [2018] EWCA Civ1808

against [the LPAs] local housing need where the strategic policies are more than five years old.

3.7 The 2021 London Plan sets out in Policy H1 and Table 4.1 (which is referred to therein) the housing requirement figure, which for Hillingdon is for 10,830 dwellings over the 2019/20 – 2028/29 period. This generates an annual requirement for 1,083 dwellings per annum, which is the requirement figure which the Council used in its March 2023 *5 year supply of deliverable housing sites* report.

3.8 However it is also relevant to note that the 2021 London Plan will pass its 5th anniversary of adoption in March 2026, at which point – applying NPPF Para 78, the five year housing land supply would shift to being assessed against Hillingdon's local housing need. This is a much higher figure of 2,285 dpa (see Table 2.1). As the determination of the planning application may be post March 2026, we have also assessed herein the housing land supply herein against the standard method figure.[9] This is provided as a sensitivity analysis.

Shortfall

3.9 A shortfall against the planned requirement in London Plan Policy H1 has arisen, comparing the requirement in Policy H1 to delivery based on the London Planning Datahub data. This dataset is used as it provides completions for 2024/25.

Table 3.1 Shortfall Calculation against London Plan Requirement

	Hillingdon
Annual requirement	1,083
London Plan requirement 2019-25	6,498
Housing supply 2019-25	5,279
Shortfall	1,219

[9] The provisions in NPPF Footnote 41 are not considered likely to apply given that the Mayor of London has commenced a review of the London Plan in part in recognition of the higher housing need.

3.10 The shortfall is included within the five year requirement (the Sedgefield approach) in line with the approach recommended in the PPG.

3.11 There is no shortfall to include within the calculation using the standard method figures, in line with the PPG.

Buffer

3.12 NPPF Para 78 indicates that a 5% buffer is to be included to ensure choice and competition in the market for land; increased to 20% where there has been significant under-delivery, as measured using the Housing Delivery Test results. A 20% buffer is applicable where the HDT measurement falls below 85% (as provided for in Footnote 40).

3.13 The current published HDT results for 2023 show a figure of 93% for Hillingdon. We have therefore used this to calculate the current requirement.

3.14 However our analysis in Table 2.2 indicates that future HDT result publications are likely to see the results for Hillingdon fall below the 85% threshold in NPPF Footnote 40, and therefore a 20% buffer would be applicable. We therefore apply this to our calculation of the requirement post March 2026.

Requirement Calculation

3.15 Bringing together these different components, the total requirement over the 5 year period is for 6,966 homes using the 2021 London Plan as a starting point.

3.16 However in Spring 2026 the requirement is likely to increase: we calculate that it will increase to 13,710 dwellings based on the application of the standard method and 20% buffer.

Table 3.2 Housing Requirement Calculation

	2021 London Plan	2025 Standard Method
Base requirement	1,083	2,285
Base requirement over 5 years	5,415	11,425
Shortfall	1,219	0
Sub-total	6,634	11,425
% Buffer	5%	20%
Buffer figure	332	2,285
Total requirement	6,966	13,710
Requirement per year	1,393	2,742

Approach to assessing the Deliverable Supply

Definition of Deliverable

3.17 NPPF Para 74 requires an LPA to demonstrate a supply of specific deliverable sites. 'Deliverable' is defined in the NPPF Glossary as follows:

> *Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*
>
> *a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
>
> *b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

3.18 Sites with planning permission which do not involve major development (such as those of less than 10 dwellings) and larger schemes which have detailed planning permission (full or reserved matters), which fall under Part a) of the definition, are to be considered deliverable unless there is clear evidence that homes will not be delivered in the five year period. Such sites are to be considered deliverable in principle.[10]

3.19 In contrast, sites with outline permission, extant allocations and those on brownfield registers, which fall under Part b) of the definition, should be considered deliverable only where there is **clear evidence** that housing completions will begin on site within 5 years.

3.20 In a Consent Order dated 7th May 2020 regarding a case in South Northamptonshire,[11] the Secretary of State conceded that Part b) of the definition of 'deliverable' was not to be regarded as a 'closed list' and that the proper interpretation was that any site which can be shown to be available now, offer a suitable location for development now and be achievable with a reasonable prospect that housing will be delivered on the site within five years will meet the definition of deliverable; and that the examples given in categories a) and b) [now in NPPF Para 74] are not exhaustive. Whether a site does or does not meet the definition is a matter of planning judgment on the evidence available.

Appropriate Evidence

3.21 The correct approach to assessing the deliverability of sites falling under Part b) of the definition is to consider the **quality of the evidence**. Inspector Felgate in an appeal decision related to *Land off Popes Lane, Sturry, Kent* outlines that "*it is clear from the NPPF and PPG that, until sites achieve detailed planning permission, they should not be treated as*

[10] PPG ID: 68-007-20190722

[11] East Northamptonshire Council, SSCLG & Lourett Developments [CO/917/2020] dated 7th May 2020

deliverable, unless the evidence clearly demonstrates that this status is justified" (Para 22)[12].

3.22 Inspector Stephens in an appeal relating to Land on East Side of Green Road, Woolpit, Suffolk[13] found that the Glossary definition of deliverable in the NPPF 2018 goes further than its predecessor and "*the onus is on the LPA to provide that clear evidence for outline planning permissions and allocated sites*" (Para 65). He went on to outline that the updated PPG sets out guidance on what constitutes 'deliverable sites' (which we consider further below) and "*places great weight on the adequacy and sufficiency of consultation with those responsible for delivering dwellings*" (Para 69). He also noted that Para 73 of the NPPF 2018 [now Para 78] requires the Council's housing supply to be made up of '*specific sites*.'

3.23 Planning Practice Guidance provides guidance on the quality of evidence expected. Para 68-007[14] outlines that in order to demonstrate a 5 years' worth of deliverable housing supply, **robust, up-to-date evidence needs** to be available (**our emphasis**). It outlines that the evidence required to demonstrate the deliverability (for sites which are not considered deliverable in principle) may include:

- current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;

- firm progress being made towards the submission of an application – for example, a written agreement between the local planning

[12] APP/W3520/W/18/3194926

[13] Appeal APP/W3520/W/18/3194926

[14] PPG ID: 68-007-20190722

authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;

- firm progress with site assessment work; or
- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.

3.24 PPG Para 68-007 also cross refers to the Housing and Economic Land Availability PPG. This refers to the tests necessary to demonstrate deliverability. Iceni would make the following points, having regard to the PPG:

- Suitability – we consider that for five year land supply purposes suitability should be assessed against policies in the adopted development plan.
- Availability – the PPG outlines that there should be confidence that there are no legal or ownership impediments to development, for example land controlled by a developer or landowner who has expresses an intention to develop may be considered available. Regard should be had to the delivery record of developers or landowners putting forward sites (PPG 3-019)[15].
- Achievability – the test is one of whether the evidence supports a *reasonable prospect* of the site being developed at a particular point in time, having regard to economic viability and the capacity of a developer to let/sell properties (PPG 3-020)[16].
- Timescales and Rate of Development – information on suitability, availability and achievability can be used to assess the timescale within which <u>each site</u> is capable of development. This may include

[15] ID: 3-019-20190722

[16] ID: 3-020-20190722

indicative lead-in times and build-out rates for the development of different scales of site. The advice of developers or local agents will be important in assessing [this] (PPG 3-022)[17].

Our Assessment of Deliverable Supply

3.25 To provide an up-to-date assessment of the deliverable supply, Iceni has considered both the sites identified in the Council's March 2023 assessment of the 5 Year Supply of Deliverable Housing Sites; as well as information contained in the London Planning Datahub (which is maintained by the GLA) as part of its Residential Pipeline Dashboard. Our analysis focuses on sites accommodating major development (> 10 dwellings).

3.26 We have considered each site and undertaken research to consider whether it has been completed, its current planning status, developer involvement and progress towards construction. We have discounted sites which have been completed prior to a 1st April 2025 base date, and the status of sites with extant consent at this date as well as extant allocations.

3.27 As might be expected, a number of the sites which were identified in the Council's March 2023 assessment have since been completed. Some scheme with planning consent have lapsed (including a number of sites where prior approval for residential conversion was in place, but where development has not been taken forwards). The Master Brewer site is one such example, where the developer (Inland Homes) fell into administration; and the extant planning consent has since lapsed. Our analysis however equally picks up further consents granted between March 2023 and March 2025.

[17] ID: 3-022-20190722

3.28 The table below provides our assessment of the deliverable supply over the five year period from major sites.

Table 3.3 Deliverable Supply from Major Sites 2025-30

Site	**Deliverable Supply 2025-30**
Former Nestle Factory, Bestles Avenue, Hayes	475[18]
Comag Tavistock Works, Tavistock Road, UB7 7QE	104
St Andrews Park, RAF Uxbridge, Hillingdon Road, Uxbridge	484
The Old Vinyl Factory Site, Blyth Road, UB3 1BW	184
5 Otter House, Cowley Business Park, Cowley, Uxbridge	36
HPH3, Millington Road, UB3 4AZ	75
Land at Austin Road, Hayes, UB3	100
Land at Avondale Drive Estate, Hayes, UB3	96
HPH4, Millington Road, UB3 3AZ	131
14-18 Pield Heath Road & 2 Pield Heath Avenue, Pield Heath	32
Murray Engineering (Hayes) Ltd Silverdale Road Hayes	22
Land At Yiewsley Library & Former Yiewsley Pool Falling Lane Otterfield Road Yiewsley	95
Hayes Park Central And South, Hayes Park Hayes End Road Hayes	124
Hayes Park North	64
Cedar House Vine Lane, Hillingdon, UB10 0NF	5
3 Viveash Close Hayes, UB3 4RY	127
Transport House, Uxbridge Road, Hillingdon	12
Childrens Home, Charville Lane, Hayes	6
Total	**2,172**

3.29 At St Andrew’s Park, we include the outstanding components of Town Centre West and East of Mons Barracks; and a contribution of 100 further dwellings from the outline component of 356 dwellings which is currently before the Council.

3.30 For the Council’s regeneration scheme at Austin Road, Hayes, delivery is envisaged to 2031. We assume all demolition occurs before 2030 but

[18] Yield based on data on extant supply from London Planning datahub

an estimated 65 homes are completed beyond 2030. The five year yield, in net terms, is thus 100 dwellings.

3.31 For the HPH3 site, an application has been submitted for 673 residential units by Collumbia Threadneedle in August 2025 but the application is in outline; and there is a lack of clear evidence on delivery timescales and likely a significant lead-in time to first completions. We include therefore only the component for which prior approval exists (for 75 flats).

3.32 We consider that there are a number of schemes where the current evidence does not meet the requires threshold for clear evidence to support their inclusion within the deliverable supply. These include:

- Northwood and Pinner Cottage Hospital & Northwood Health Centre: whilst the development of the health centre is progressing; the residential consent is outline only and there is no evidence of progress in bringing forward residential development at the time of writing;

- Woodside Day Centre: previous consent appears to have lapsed and there is no evidence of progress with, or clear timescales for, bringing forward residential development;

- Harefield Grove: applications for planning consent and listed building consent both remain outstanding, according to the Council's Planning Portal despite submission in 2022;

- Riverview House and Waterside House, Cowley Business Park: prior approvals for both buildings have not been implemented; and there is no extant approval/consent at the base date;

- Keith House, Hayes: the applicant who brought forward this application (the Collective) has fallen into administration.

- Master Brewer site: the consent for this scheme has lapsed and the previous developer fell into administration. No further applications have been submitted.

Windfall Allowance

3.33 In their 2023 assessment of housing land supply, Hillingdon adopt a windfall assumption of 295 units per annum across five years.

3.34 This assumption is based on the small sites target in the London Plan. Table 4.2 of the London Plan identifying a target of 295 units per annum on sites under 0.25 ha in Hillingdon. This is based on trends in housing completions and estimated capacity for net additional supply from intensification as analysed in the 2017 London SHLAA. As noted in Hillingdon’s assessment, paragraph 4.2.3 of the London Plan notes:

> *“The small sites target can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply and so provides the compelling evidence in this respect required by paragraph 70 of the National Planning Policy Framework of 2019.”*

3.35 Paragraph 70 of the 2019 NPPF has become paragraph 75 of the December 2024 NPPF, and states:

> “*Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends”*

3.36 More recent data from the Planning London Datahub shows a ten-year (i.e. 2015/16 – 2024/25) average housing delivery in Hillingdon on sites of up to 0.25 ha of 317 units per annum, which is broadly consistent with the 295 units per annum assumption (noting potential inaccuracies in the data on the Planning London Datahub).

3.37 In addition, the residential pipeline dashboard in the Planning London Datahub identifies a pipeline of approved but not completed units on sites up to 0.25ha in Hillingdon of 925 net units in 2024, which would provide around three years of small sites supply at 295 units per annum and a reasonable lapse rate of 5-10%.

3.38 Given this recent data, Hillingdon's small sites windfall assumption of 295 units per annum, as set out in the 2021 London Plan, is considered to remain reasonable. Iceni has adopted this assumption in calculating the housing land supply. This provides 295 x 5 = 1,475 units of supply across five years.

Housing Land Supply Position

3.39 The table below brings together the requirement and deliverable supply in LB Hillingdon.

Table 3.4 Housing Land Supply Position – LB Hillingdon, 2025-30

	2021 London Plan	2025 Standard Method
Total requirement	6,966	13,710
Requirement per year	1,393	2,742
Deliverable supply - specific sites	2,172	2,172
Windfall Sites	1,475	1,475
Total supply	3,647	3,647
Years' supply	2.6	1.3
Supply shortfall	3,319	10,063

3.40 **This assessment thus identifies only 2.6 years of supply against the current London Plan requirement**. This is well below the five years that Hillingdon are required to maintain under the provisions of the NPPF, and indicates **a substantial shortfall of over 3,300 homes in deliverable supply over five years**.

3.41 Following March 2026 when Hillingdon's housing land supply requirement increases as a result of the 2021 London Plan becoming out of date and assuming updated HDT results are published, Hillingdon's deliverable housing land supply will drop to 1.3 years. This is a very low position which would indicate a very substantial shortfall of over 10,000 homes over five years.

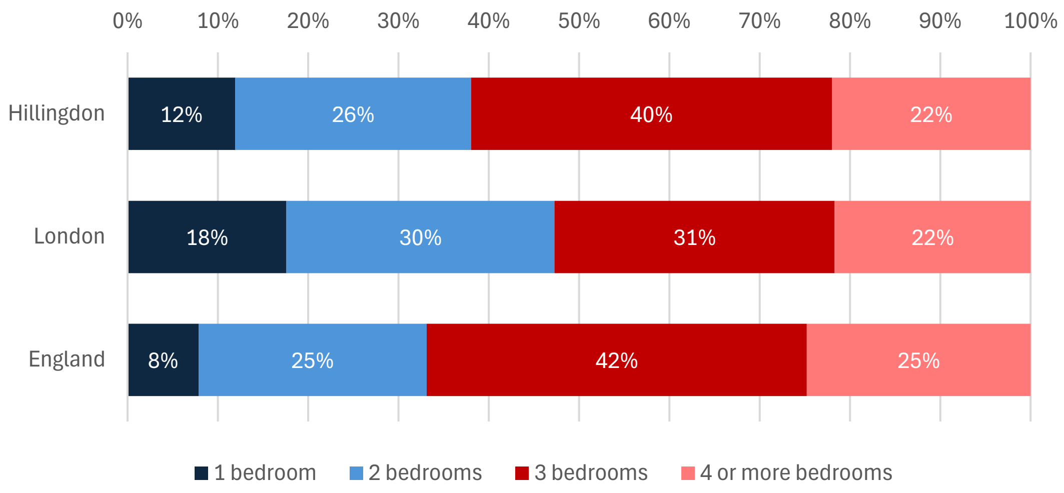
3.42 In both cases these results point to an urgent need to grand additional residential consents. They also engage paragraph 11(d) of the December 2024 NPPF, under which the presumption in favour of sustainable development applies in favour of granting consents for additional housing supply.

4. Housing Mix Justification

Current Housing Mix in Hillingdon

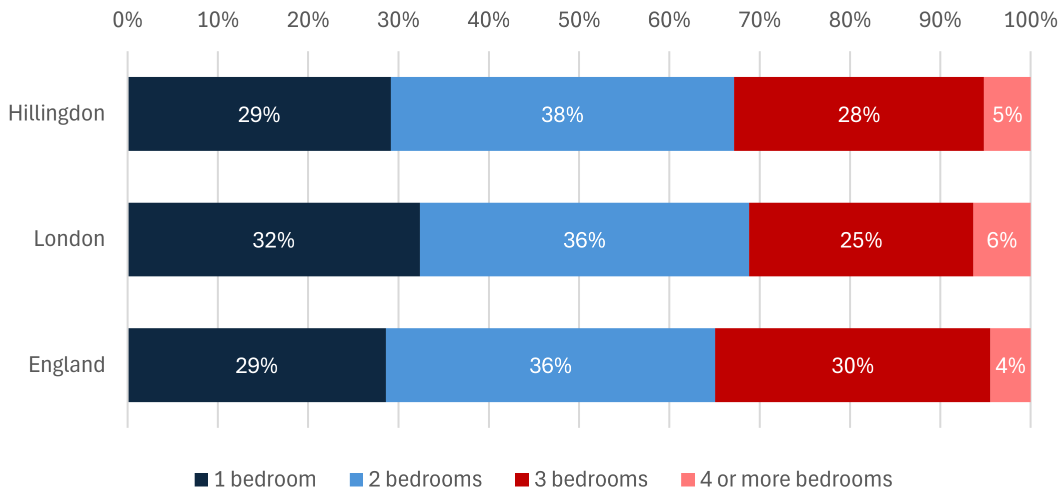
4.1 The current size mix of market and affordable housing in LB Hillington is shown in the figures below, compared to London overall and to England.

Figure 4.1 Market housing size mix



Source: ONS Census 2021

Figure 4.2 Affordable (shared ownership and social rent) size mix



Source: ONS Census 2021

4.2 Hillingdon is an outer London borough, and so compared to London overall has a market housing mix profile more focused on family housing of three or more bedrooms. These homes make up 62% of the stock in Hillingdon, compared to 53% of the stock across London.

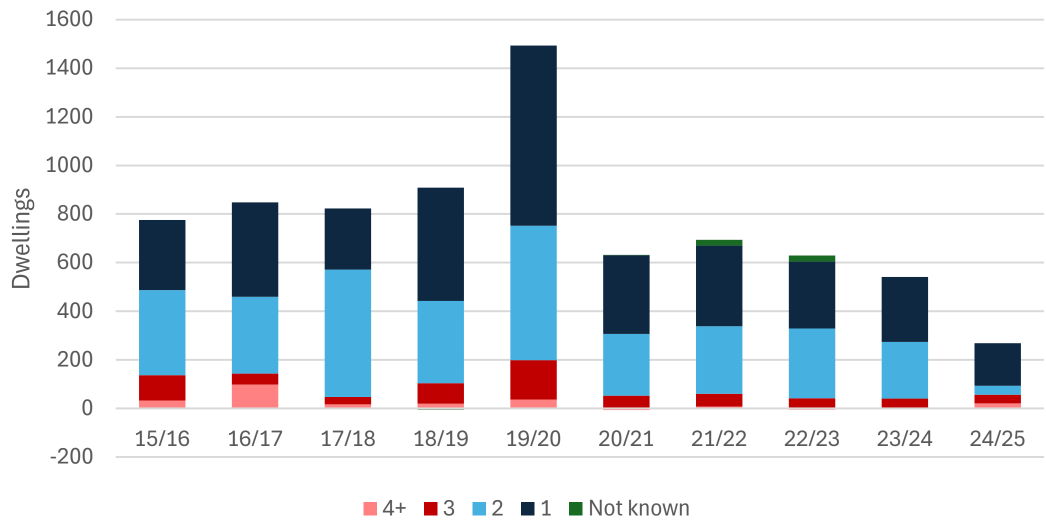
4.3 This corresponds to market housing demand in Hillingdon, as well as to its urban form and level of transport connectivity. While there are smaller flatted homes in the borough, particularly in better connected locations and around town centres such as Uxbridge, Hayes and others, there are also large areas of more suburban housing with poorer access to public transport where larger homes are more common.

4.4 Hillingdon has a market housing mix similar to that of England as a whole (in which 67% of housing has three or more bedrooms), but slightly more focused on one and two bedroom homes.

4.5 There are greater similarities in the size mix of affordable housing in Hillingdon, London and England, with relatively similar percentages of one, two, three and four or more bedroom homes in each. The affordable housing mix is more focused towards smaller properties than for market homes – as in the affordable sector households are typically allocated a home which corresponds with the size of household; whereas in the market sector the size of home households occupy relates more to age and wealth than household size.

4.6 In contrast to Hillingdon’s current housing, which has a mix of sizes focused on family homes, recent housing delivery has been dominated by one and two bedroom units (as shown in the figure below).

Figure 4.3 Market housing completions by number of bedrooms, Hillingdon



Source: Planning London Datahub

4.7 Data from the Planning London Datahub shows **that over the last 10 years, one and two bedroom homes have made up the vast majority (88%) of new homes delivered in the Borough**, as shown in the table below. **This imbalance has become even greater over the last five years, with one and two bedroom units making up 91% of new homes built in Hillingdon**.

4.8 On average over the last five years there have been just 48 completions per year of family sized homes with three or more bedrooms in Hillingdon, and just 36 per average over the last ten years.

Table 4.1 Market housing completions by number of bedrooms in Hillingdon since 2015/16

	5 years (2020/21 – 2024/25)		10 years (2015/16 – 2024/25)	
	Completions	% of completions (exc. Unknown)	Completions	% of completions (exc. Unknown)
1-bed	1,375	51%	3,513	47%
2-bed	1,088	40%	3,170	42%
3-bed	220	8%	644	9%
4+ bed	21	1%	226	3%
Unknown	48		36	
Total	2,752	100%	7,589	100%

Source: Local Authority Housing Statistics, 2023/24

4.9 Family sized homes have made up a greater proportion of new affordable housing, with 38% of new homes for low cost rental tenures having three or more bedrooms. However, only 10% of new homes with intermediate tenures have been family-sized, with only 75 delivered across ten years.

Table 4.2 Affordable housing completions by number of bedrooms in Hillingdon over 10 years (2015/16 – 2024/25)

	Low cost rent		Intermediate tenures	
	Completions	% of completions (exc. Unknown)	Completions	% of completions (exc. Unknown)
1-bed	132	37%	348	48%
2-bed	89	25%	296	41%
3-bed	111	31%	75	10%
4+ bed	22	6%	0	0%
Total	354	100%	719	100%

Source: Local Authority Housing Statistics, 2023/24

Scheme Location

4.10 The Site is located in an area of low public transport accessibility, with TFL's 2023 PTAL tool indicating a PTAL score of zero. The nearest publicly accessible roads achieve scores of 1b (Park Lane to the East) and 1b/2 (Hayes End Road / Mellow Lane E to the south). It is not within a town centre or near a major town centre.

4.11 Given the site has relatively poor accessibility, it is not considered an appropriate location for a large proportion of smaller units. Instead, it is more appropriate for larger family-sized housing.

Housing Needs Evidence

4.12 The Council's existing published housing needs evidence is set out in the LB Hillingdon *Strategic Housing Market Assessment Update* (ORS, October 2018).

4.13 The need for market housing identified is shown in the table below. This need was focused on larger homes, with 82% of the Borough's need being for family-sized homes with 3 or more bedrooms.

Table 4.3 Market Housing Need, LB Hillingdon 2014-36

	Market Homes, 2014-36	% Total
1-bed	300	1%
2-bed	5,000	17%
3-bed	18,200	61%
4-bed	5,400	18%
5+ bed	900	3%
Total	29,800	100%

Source: SHMA Update 2018, Figure 35

4.14 The affordable housing need shown in the 2018 evidence is shown in the following table. In contrast, to the market need, this need was focused on 2- and 3-bed homes (45% and 38% respectively).

Table 4.4 Affordable Housing Need, LB Hillingdon 2014-36

	Affordable Homes, 2014-36	% Total
1-bed	1,000	7%
2-bed	6,300	45%
3-bed	5,300	38%
4-bed	1,200	9%
5+ bed	300	2%
Total	14,100	100%

Source: SHMA Update 2018, Figure 35

4.15 The housing register provides additional real-world information on the level of need for affordable housing of different sizes. The number of households on the Hillingdon housing register as of 2023/24 is shown in the table below, broken down by size of home required. In contrast to the housing need evidence, this shows a broad range of homes are required, with roughly equal numbers of households requiring one, two and three bedroom homes. The greatest absolute number of those on the Register require 1-bed homes.

Table 4.5 Profile of Need on LB Hillingdon Housing Register, March 2024

	Households	% Register
1-bed	1,225	31%
2-bed	1,149	29%
3-bed	1,151	30%
4+ bed	369	9%
Total	3,896	100%

Source: Local Authority Housing Statistics, 2023/24

Viability Considerations

4.16 Consideration of the level and mix of affordable housing within the development is considered in the Financial Viability Assessment submitted with the application. This demonstrates that it is not viable to provide 50% affordable housing and in this scenario no development would occur, and there would be no contribution from the site to meeting the Borough's evidently acute housing needs.

4.17 The viability evidence informs the proposed housing mix of 25% affordable housing with a tenure split of 70% social rented and 30% intermediate (shared ownership) homes in accordance with the Council's preferred tenure mix. The tenure mix addresses the priority need for social rent.

4.18 The viability evidence indicates that this is the maximum level of affordable housing that the proposed scheme could viably support. Further detail is set out in the Financial Viability Assessment itself.

Proposed Size Mix

4.19 The following table brings together Hillingdon's market housing need by number of bedrooms with recent delivery (i.e. over the last 10 years). Recent delivery statistics for Greater London are also shown.

Table 4.6 Comparison of housing need and completions by size

	% of Hillingdon Market Need	% of Hillingdon Completions (10 years)	% of London completions (10 years)
1-bed	1%	47%	43%
2-bed	17%	42%	40%
3-bed	61%	9%	14%
4+-bed	21%	3%	3%

4.20 This table demonstrates that Hillingdon's recent housing delivery profile deviates significantly from need. While 82% of Hillingdon's evidenced market housing need is for family-sized homes of 3+ bedrooms, only 9% of delivery over the last ten years has been in this size range.

4.21 The lack of family housing delivery is replicated across London, with only 17% of new market housing over the last 10 years having 3+ bedrooms. As a result, family housing delivery in lower-density authorities like Hillingdon is even more important. In this context, **there is a clear and significant unmet need for family sized housing in Hillingdon**. **The proposed housing mix responds to this.**

4.22 As shown in the table below, the proposed scheme has a focus on 3-bed homes, together making up 69% of proposed units. Indeed, the number of family-sized homes proposed (36) represents the Hillingdon's ten-year annual average delivery (borough-wide) of family sized housing delivery on a single site. This represents a major public benefit of the proposed scheme.

Table 4.7 Proposed Housing Mix

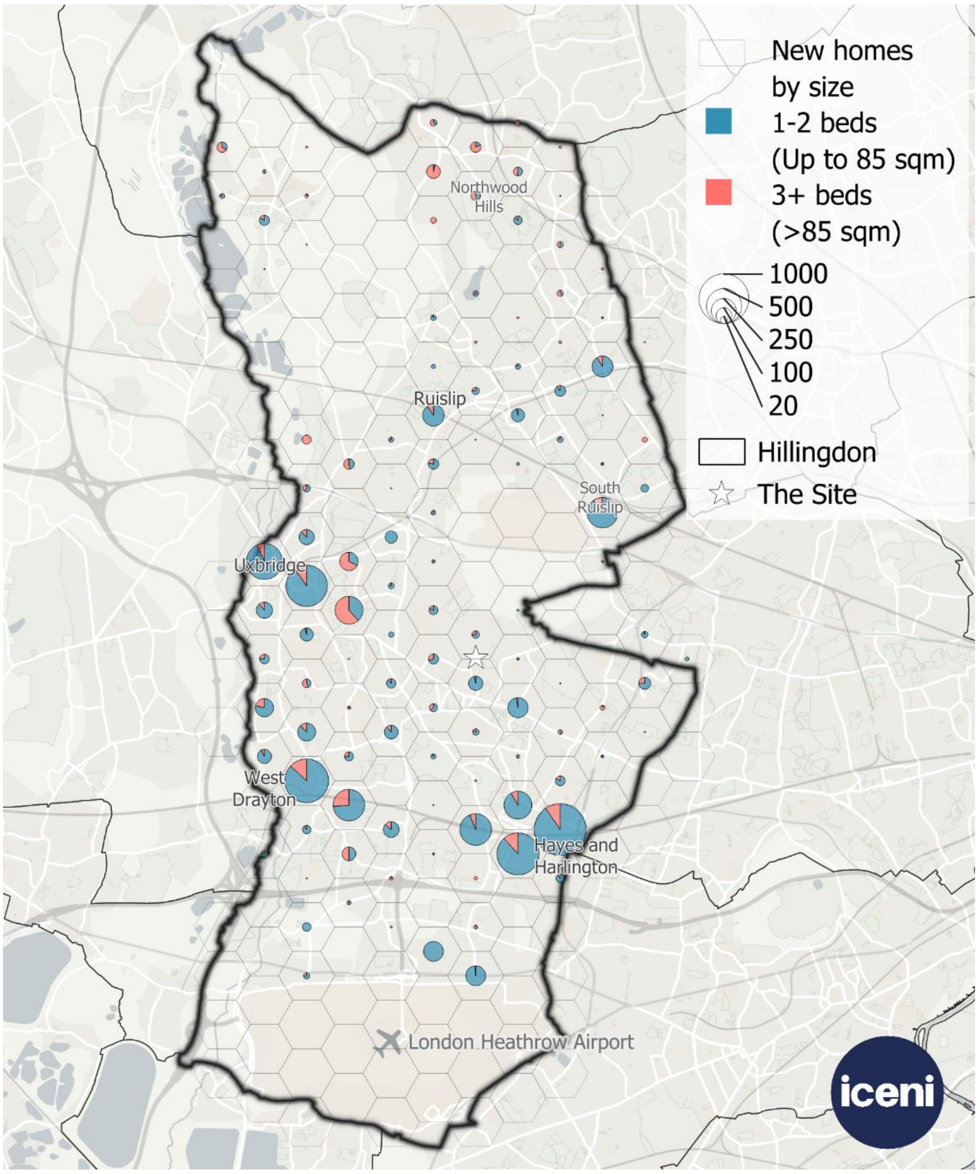
	Homes	% Homes
1-bed	16	31%
3-bed	36	69%
Total	52	100%

4.23 As discussed above, the proposed housing mix is also consistent with the site location, with the Site's relatively low level of accessibility making it most appropriate for family sized housing.

4.24 As shown in the figure below, recent housing delivery in Hillingdon has been highly focused around Elizabeth line and Underground stations particularly at Uxbridge, West Drayton and Hayes and Harlington. These locations are more appropriate for higher-density flatted schemes containing with a higher proportion of smaller units. By contrast, while delivery has been much lower elsewhere, there are multiple locations with lower accessibility in which 3+ bed homes make up a higher proportion of delivery.

4.25 As a result, the delivery of family housing represents an appropriate response to the location and context of the Site, as well as making a contribution to meeting a major unmet housing need.

Figure 4.1 New housing completions by size across Hillingdon between 2015/16 – 2024/25



Source: Iceni analysis of EPC Data

5. Conclusions and Summary

5.1 This report has provided evidence regarding the need for housing to support the planning application for the proposed development.

Housing need and delivery

5.2 The evidence demonstrates that there is a crisis in housing delivery in London. Housing targets in the London Plan are consistently not meeting assessed need. The assessed need has increased in recent years, standing at 66,000 dpa in the 2021 London Plan and being recognised as 88,000 dpa in the December 2024 Standard Method and Towards a New London Plan Consultation Document.

5.3 However, housing delivery has fallen substantially in recent years, with approvals and starts now at near historic lows. Across six out of ten years of the London Plan's plan period, there has been a housing shortfall of 102,400 homes (rounded) when assessed against the housing target, and 184,700 when assessed against the annual need of 66,000 dpa on which the London Plan was based.

5.4 Hillingdon has also seen falling housing completions, with completions dropping since 2019/20, and now sitting at around half of the London Plan target for Hillingdon (which is itself less than half of the need as set in the December 2024 Standard Method). Between 2019/20 – 2020/21, there has been a shortfall in delivery of c. 1,000 dwellings within Hillingdon.

5.5 In this context, there is an urgent need to approve additional housing to increase housing delivery in Hillingdon and across London more broadly. The GLA has acknowledged in consultation for the next London Plan that development in the green belt will be required to meet this need.

Five-year housing land supply

5.6 Hillingdon has not published an up-to-date housing land supply assessment, as they are required to do. As a result, Iceni has estimated housing land supply based on a range of data sources.

5.7 Based on Iceni's assessment, a number of schemes in Hillingdon do not meet the required threshold for clear evidence to support delivery supply. Iceni estimate the deliverable supply to currently be 2.6 years, well below the required 5 years.

5.8 However, after March 2026 the London Plan will become out of date, at which point Hillingdon's housing requirement will increase. In addition, the next HDT is anticipated see a 20% buffer need to be added to the HLS. As a result, there will be a substantial increase in the overall HLS requirement, seeing deliverable supply fall to just 1.3 years – a very low result indicating a deliverable supply shortfall of over 10,000 homes.

5.9 These results point to an urgent need to grant consents for additional housing supply. They also engage paragraph 11(d) of the December 2024 NPPF, under which the presumption in favour of sustainable development applies.

Housing mix

5.10 The scheme proposes a mix of housing focused on three bedroom homes. This is an appropriate response to the site location, with relatively low levels of accessibility. It also contributes to meeting a substantial unmet need for family housing in Hillingdon and across London.

5.11 Hillingdon's most recent housing evidence found that 82% of market housing need is for family sized homes of 3+ bedrooms. By contrast, these homes have made up just 17% of market housing completions over the last ten years. As a result, there is a substantial unmet need for family-sized housing in the Borough (and across London more broadly), which the proposed scheme would make an important contribution towards addressing.