

# **Hounslow Local Plan (2020-2041)**

## **Examination Matters, Issues and Questions**

### **Matter 3 – Meeting the Borough’s Housing Needs**

#### **London Borough of Hounslow Council Response**

**December 2025**



**London Borough  
of Hounslow**

## Council's Response to Inspectors' Matters, Issues, Questions

### Matter 3: Meeting the Borough's Housing Needs

**Issue 1: Whether the Plan has been positively prepared and whether it is justified, effective, consistent with national policy and in general conformity with the London Plan in relation to meeting the Borough's housing needs?**

#### Questions:

**Q1) Is the overall quantity of new homes that are to be planned for in the Borough up to 2041 justified and consistent with national policy?**

#### Q1) LBH Response:

1. The housing target of 28,040 homes set out in Policy SC1 of the Local Plan (**S1**)<sup>1</sup> has been informed by the London Plan 2021 (**ADP1**)<sup>2</sup>. Paragraphs 2.1 – 2.4 of the Housing Background Explanatory Note (**EBSC1**)<sup>3</sup> explain how the approach taken to setting the target, and the overall quantity of homes planned for in the borough up to 2041, is justified and consistent with national policy.

**Q2) Having regard to the London Plan 2021 requirement for net housing completions of 1,782 homes per year for the ten-year period covering 2019/20 to 2028/29:**

**a) What is the basis for the Plan identifying the housing requirement for the remaining years to the end of the Plan period and would it be in general conformity with the London Plan 2021?**

#### Q2a) LBH Response:

2. The basis for identifying the housing requirement for the years 2029/30 to 2040/41 of the Plan is explained in paragraphs 2.6 and 2.20 of Document EBSC1. This is reiterated in paragraphs 2.6 and 2.23 of the Housing Background Explanatory Note Update (**EX7**)<sup>4</sup>. As this follows the direction set out in paragraph 4.1.11 of the London Plan 2021 (**ADP1**) the approach is in general conformity with the London Plan. The Council refers to paragraph

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<sup>1</sup> S1 - [Hounslow Local Plan 2020-2041 Submission Version](#)

<sup>2</sup> ADP1 - [London Plan \(2021\)](#)

<sup>3</sup> EBSC1 - [Housing Background Explanatory Note \(June 2025\)](#)

<sup>4</sup> EX7 - [Housing Background Explanatory Note Update, September 2025](#)

0.0.21 of **ADP1** which sets out that boroughs do not need to revisit the housing targets set by the Mayor. The Council also refers to NPPG paragraph: 013 Reference ID: 2a-013-20241212 which explains where a spatial development strategy has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to re-visit their local housing need figure when preparing new strategic or non-strategic policies.

**Q2b) Is there any justification for departing from the London Plan 2021 housing requirements?**

**Q2b) LBH Response:**

3. No. The Local Plan is in general conformity with the London Plan as confirmed by the GLA under the “General” subheading on page 2 of the Mayor’s Regulation 19 Response/General Conformity Statement (REP074 of Document **S9**<sup>5</sup>). This position is reiterated in the Council’s Statement of Common Ground with the Mayor (**EX5e**<sup>6</sup>) in paragraph 4.3.2.

**Q3) Is the housing requirement/target identified correctly in Policy SC1 and on the Housing Trajectory in SC2.1? Why does it include a base year of 2020/21? Should it be modified to take account of any under-delivery in the 2019/20 year of the London Plan 2021 requirement?**

**Q3) LBH Response:**

4. The Housing Trajectory, Figure SC2.1, correctly includes a base year of 2020/21 as the plan period for the Local Plan is 2020 to 2041, and therefore incorporates monitoring years 2020/21 to 2040/41. It is acknowledged that the base year for Hounslow’s housing target set out in Policy H1 of **ADP1** is 2019/20 and it therefore stands to reason that any previous under delivery against the housing target in 2019/20 should be added to the Local Plan housing target. Under delivery is calculated as 257 dwellings when comparing the housing target of 1,782 homes per year with the completions recorded for 2019/20 in the Housing Delivery Test: 2022 measurement<sup>7</sup>.

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<sup>5</sup> S9 - [Link to Representations made pursuant to Regulation 20 \(in response to consultation at Regulation 19 Stage\)\(Redacted\)](#)

<sup>6</sup> EX5e - [Statement of Common Ground between LB Hounslow and the Mayor of London \(October 2025\)](#)

<sup>7</sup> [Housing Delivery Test: 2022 measurement](#)

5. As such, the Council refers to proposed modification **HLP\_C5\_04** in the Schedule of Suggested Modifications (**S11**<sup>8</sup>) which includes a revised version of Figure SC 2.1: Housing Trajectory, adding a further 257 homes to the housing target in year 2020/21. The Council also refers to proposed modifications **HLP\_C5\_01**, **HLP\_C5\_02** and **HLP\_C5\_03** in **S11** which amend the policy wording and supporting text to include the additional 257 dwellings within the housing target.

**Q4) Detailed questions on housing supply are to be addressed separately during the Stage 2 hearings. However, in overall terms, is the Plan approach positively prepared insofar as it seeks to meet the identified housing requirement, particularly as the five-year supply must be made up of “specific, deliverable sites”, with “specific, developable sites” also being a component of the supply over the rest of the Plan period?**

**Q4) LBH Response:**

6. Yes. The Local Plan housing target set out in Policy SC1 is 28,040 homes over the Plan period. Subject to proposed modifications **HLP\_C5\_01**, **HLP\_C5\_02**, **HLP\_C5\_03** and **HLP\_C5\_04** in **S11**, this would be increased to 28,297 homes to account for under delivery in year 2019/2020 on the London Plan 2021, as explained in paragraph 3.28 of **EBSC1**. The Local Plan, through Policy SC1, makes provision for 28,840 homes, which therefore exceeds the housing target.
7. Table 2 in Paragraph 4.4 of **EBSC1** sets out the Plan’s five-year supply of “deliverable sites” which is 5.13 years at a base date of 1<sup>st</sup> April 2022. The Council updated the five-year supply position in **EX7**<sup>9</sup>, with a base date of 1<sup>st</sup> April 2024, which if calculated as per NPPF 2023 is 5.53 years as shown in Table 4 in paragraph 4.23 of **EX7**. The Hounslow Site Allocations and Capacity Assessment (2024) (**EBSC2**<sup>10</sup>) includes the detailed

**Q5) Policy H2 of the London Plan 2021, amongst other things, sets out that boroughs should identify and allocate appropriate small sites (defined as below 0.25 hectares in size) for residential development. Would the proportion of housing anticipated to come forward on small sites in the Borough provide a genuinely planned approach to meeting the requirements of the London Plan 2021?**

<sup>8</sup> S11 - [Schedule of Suggested Modifications](#)

<sup>9</sup> EX7 - [Housing Background Explanatory Note Update, September 2025](#)

<sup>10</sup> EBSC2 - [Hounslow Site Allocations and Capacity Assessment \(SACA\) \(2024\)](#)

assessment of the deliverable and developable sites that comprise the housing supply over the Plan period.

**Q5) LBH Response:**

8. Yes. The Council refers to paragraphs 6.8 to 6.11 of **EX7** which explain the Plan's approach to small sites. As set out in paragraph 6.9 of **EX7**, a total capacity of 3,604 homes on small sites of 0.25 hectares or less in Hounslow will be delivered over the period 2019/20 to 2028/29. The figure of 3,604 homes exceeds the London Plan target of 2,800 homes which also applies over the period 2019/20 to 2028/29, by 804 homes. The 3,604 homes figure includes completions from 2019/20 to 2023/24, small sites assessed as deliverable or developable in **EBSC2** that were subsequently added to the Brownfield Land Register (as they did not meet the >0.25 hectare size criteria for allocations), and pipeline permissions.

**Q6) Is the Plan sufficiently clear as to the respective amount of housing that is to be delivered on small and medium sized sites (no larger than one hectare) in accordance with the Framework?**

**Q6) LBH Response:**

9. Yes. Paragraph 5.7 in the supporting text to strategic Policy SC1 of the Plan sets out the strategic approach to small sites, and paragraphs 5.6 and 5.7 of **EBSC2** provide further explanation for the number of homes that will be delivered on sites no larger than one hectare.

**Issue 2: Whether the Plan will be effective in delivering affordable housing to meet the needs of the Borough and an appropriate mix and standard of housing to meet the other housing needs of different groups in the community over the Plan period?**

**Q1) What is the basis for the Council approach to meeting objectively assessed needs for affordable housing?**

**Q1) LBH Response:**

10. The Local Housing Needs Assessment Update 2024 (**EBSC3**<sup>11</sup>) identifies the affordable housing needs for Hounslow, including the split of sub tenure types. Paragraphs 5.13 to 5.16 of **EBSC3** confirm the identified OAN for affordable housing in Hounslow which equates to a minimum of 19,068 new affordable homes by 2041. Paragraphs 5.17 to 5.20 set out the recommended policy approaches to affordable housing, based on the identified OAN, noting that the OAN figure is likely to be undeliverable. The delivery of this level of affordable homes is therefore viewed within the context of the London Plan 2021 (**ADP1**) strategic target of 50% and the approaches to affordable housing delivery in its policies H4, H5 and H6.

**Q2) Policy SC2 of the Plan sets out the specific approach to affordable housing, in that regard:**

**a) Is the policy sufficiently clear and in general conformity with the strategic target and approaches in Policies H4 and H5 of the London Plan 2021?**

**Q2a) LBH Response:**

11. Yes. The Council refers to the Mayor's Statement (REP074 of **S9**). The two paragraphs under the heading "Affordable Housing" on page 3 confirm the approach to affordable housing is welcomed and consistent with **ADP1**. This position is reiterated in paragraph 4.5.4 of the Council's Statement of Common Ground with the Mayor (**EX5e**).

**Q2b) Is there a justifiable reason why a minimum requirement for the number of affordable homes to be delivered in the Borough over the Plan period is not included?**

**Q2b) LBH Response:**

12. Yes. The Plan must be in general conformity with the London Plan 2021 (**ADP1**) which requires boroughs to instead apply the strategic affordable housing target of 50% set out in Policy H4 of **ADP1** and apply the Threshold Approach set out in Policy H5 of **ADP1**. Policy SC2 of the Plan expresses the affordable housing requirements as a percentage,

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<sup>11</sup> EBSC3 - [Hounslow Local Housing Needs Assessment update \(2024\)](#)  
EBSC3 - [Hounslow Local Housing Needs Assessment update \(2024\)](#)

based on either the viability tested route or Fast Track Route of the threshold approach set out in policies H5 and H6 of the London Plan.

**Q2c) In the absence of an identified minimum requirement for the number of affordable homes to be delivered, is the Plan positively prepared and how would the effectiveness of affordable housing delivery be monitored?**

**Q2c) LBH Response:**

13. Yes. The Council refers to the responses to Q2a and Q2b. As shown in the Plan's Monitoring Framework in Appendix 1, affordable housing delivery will be monitored as a percentage, both for applications following the viability tested route (50%) and applications following the Fast Track Route (35%), which is consistent with the approach in **ADP1**. Furthermore, a KPI in the number and tenure of the homes is also included in the Plan's Monitoring Framework. This is similar to the approach the Council has taken to monitoring and reporting on the Policy SC2 requirements for affordable housing that are in the current adopted Local Plan 2015-2030 (**ADP2**)<sup>12</sup>.

**Q2d) Is the proposed approach to affordable housing tenure splits justified, or should it include greater certainty and/or flexibility for individual site circumstances when having regard to the thresholds and tenure splits otherwise set out in Policies H5 and H6 of the London Plan 2021?**

**Q2d) LBH Response:**

14. Yes, the approach is justified. The Council refers to the Affordable Housing section of the Mayor's representation (REP074 of **S9**) and paragraph 4.5.4 of the Council's Statement of Common Ground with the Mayor (**EX5e**), which confirm it is the Mayor's view that the Plan's approach to affordable housing is welcomed and consistent with **ADP1**. Parts A1 and 2 of Policy H6 of **ADP1** require a minimum 30% of affordable housing in boroughs to be low cost rent and a minimum 30% to be intermediate products. Part A3 of H6 confirms the remaining 40% of affordable homes should be determined by the borough, based on identified need. The Council has produced a Local Housing Needs Assessment update 2024 (**EBSC3**). Paragraphs 5.14 and 5.15 of EBSC3

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<sup>12</sup> ADP2 - [Adopted Hounslow Local Plan Volume 1 2015-2030](#)

summarise the findings for affordable housing tenure needs in the borough, which are 70% low cost rented and 30% intermediate products, meaning the 40% element determined by the borough should be low cost rent. This approach is consistent with Policies H5 and H6 of **ADP1**.

**Q2e) Is the approach to affordable housing supported by robust evidence to demonstrate financial viability, when having regard to other requirements in the Plan, and would the decision-making approach to viability be sufficiently clear?**

**Q2e) LBH Response:**

15. Yes. The Whole Plan Viability Assessment (**EBV1**<sup>13</sup>) tests a range of scenarios for affordable housing based on the evidence in **EBSC3** in combination with other policy requirements in the Plan. The assessment concludes that the approach in Policy SC2, and the Plan as a whole, is viable. The affordable housing requirements have been arrived at having regard to the London Plan (**ADP1**) and **EBV1**.
16. **EBV1** notes that in some development scenarios, the full affordable housing requirement may be unviable. In these circumstances, Policy SC2 would be applied flexibly, in line with the Fast Track Route or Viability Tested Route set out in Policy H5 of **ADP1**. The Council also refers to the responses to Q2 and 3 in Matter 6 which provide further detail.
17. The Council considers the decision-making approach to viability in Policy SC2 of the Plan is clear, and reflective of the approach in Policy H5 of **ADP1**.

**Q2f) Would any changes be needed to provide specific requirements or clear approaches relating to First Homes, Starter Homes or Build to Rent?**

**Q2f) LBH Response:**

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<sup>13</sup> EBV1 [Hounslow Whole Plan Viability Assessment \(2024\)](#)

18. No. Neither Starter Homes nor First Homes are referred to in the London Plan 2021.

**EBSC3** notes that Starter Homes regulations have not been published, and First Homes are instead being pursued. Paragraph 3.20 of **EBSC3** notes that the Mayor is not currently progressing First Homes in London. Paragraphs 5.18 and 5.19 of **EBSC3** conclude based on the evidence in the Study that First Homes would not meet needs which aren't already addressed through policy in London, and that in general, First Homes slightly reduce viability when compared with the delivery of Shared Ownership properties. Based on this evidence, a policy requirement for First Homes is not included in the Plan. For context, it is also noteworthy that First Homes are no longer part of the current NPPF (December 2024).

19. Policy SC11 of the Plan sets out the approach to Build to Rent homes, which the Council considers is in general conformity with the London Plan 2021 (**ADP1**).

**Q3) Is the approach in Policy SC3 in terms of housing mix; positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should address the following:**

**a) Whether the preferred housing mix in Table SC3.1 is based on up-to-date evidence, and whether there is sufficient flexibility in Policy SC3 to account for site specific circumstances and viability?**

**Q3a) LBH Response:**

20. Yes, Table SC3.1 is based on Figure 51 in paragraph 4.14 of **EBSC3**, which was produced in March 2024. Flexibility is built into the wording of Policy SC3 that enables applicants to depart from the general housing mix requirements in Table SC3.1, where agreed with the Council on the basis of evidence. Furthermore, Policy SC3 is clear that the general mix as evidenced in **EBSC3** is the starting point for the negotiation, which also allows flexibility to take account of site specific circumstances or viability. Proposals may also opt to come forward through the viability tested route in Policy SC2, and as such the policy framework provides built in flexibility to ensure schemes are viable.

**Q3b) Whether the circumstances where alternatives to the housing mix in the latest Borough Local Housing Needs Assessment may be accepted, are sufficiently clear to be effective?**

**Q3b) LBH Response:**

21. Yes. The Council refers to the responses to Q3a. Parts B and F in the policy wording of SC3 clearly set out the circumstances where applicants can depart from the housing mix in SC3.1.

**Q3c) Is it justified for a development proposal to be expected to provide a unit of family accommodation at ground floor level or with direct access to the external amenity space where subdivision of large family houses is proposed?**

**Q3c) LBH Response:**

22. Yes. The Council refers to the evidence in Figure 51 of **ESBC3** and reflected in Table SC3.1 of the Plan, which demonstrates there is significant need for family sized homes in the borough. It is considered important that as far as possible, all proposals for residential development help contribute to meeting this need, including conversions and subdivisions, in order to deliver the types of housing that meet the borough's identified needs over the plan period. The requirement for the family sized unit to be at either ground floor level or with direct access to external amenity space is considered necessary to help deliver good quality homes for families and avoid sub-divisions that do not provide suitable access to semi-private or outdoor amenity space.

**Q3d) Is the definition of a large family house (i.e. more than 130 sq.m of 'original' floor area) justified?**

**Q3d) LBH Response:**

23. Yes. The Council refers to its response to Q22 of Matter 3 Issue 2 in relation to the significant need for family sized homes in the borough justified in **ESBC3**. The threshold of 130 sqm ensures that the redevelopment of existing residential properties does not involve the loss of family homes. The approach prevents the conversion of smaller

houses where they could accommodate a family, and ensures larger houses are converted to include at least one family unit.

24. The threshold tallies with similar definitions in other London boroughs including Barnet, Brent, Camden, Islington, Lambeth, Lewisham, Southwark, Wandsworth, and Westminster, and is the threshold included in Policies SC3, SC6 and SC10 of the adopted Hounslow Local Plan 2015-2030 (**ADP2**).

25. The defined minimum size of 130 sqm for a large family house to be converted is based on the minimum size and number of units to be delivered as part of a conversion, i.e. one family unit and one 1-bed (non-studio) unit. This is based on the London Plan (**ADP1**) definition for a family home (generally at least 3 bedrooms), the Nationally Described Space Standards (**EX1.19**<sup>14</sup>) and the Minimum Internal Space Standards in Table 3.1 of **ADP1** which are reflected in Policy SC5 of the Plan.

26. In accordance with **EX1.9**<sup>15</sup> and Table 3.1 of **ADP1**, a 3-bed, 4 person single storey home should be a minimum of 74 sqm. Sub-division of an existing house will inherently need to deliver a minimum of 2 homes. In accordance with **EX1.9** and Table 3.1 of **ADP1**, the other home to be delivered as part of the sub-division would need to be a minimum of 50 sqm based on the minimum size for a 1-bed 2 person (non-studio) single storey home in **EX1.9** and Table 3.1 of **ADP1**. Therefore, broadly speaking, 130sqm is the minimum floorspace required to deliver a family-sized unit and an additional non-studio 1 bed unit.

**Q3e) The policy seeks 90% of all dwellings in the Borough meet Housing Technical Standard M4(2) of the Building Regulations 2015, and 10% of all dwellings meet Housing Technical Standard M4(3) for wheelchair user dwellings. Is that approach in general conformity with Policy D7 of the London Plan 2021?**

**Q3e) LBH Response:**

<sup>14</sup> EX1.19 – [Nationally Described Space Standards \(2015\)](#)

<sup>15</sup> EX1.09 – [Mayor of London's Accessible London: Achieving and Inclusive Environment SPG \(2004\)](#)

27. Yes. The Council considers the approach in Policy SC3 of the Plan is in general conformity with Policy D7 of the London Plan (**ADP1**). The Local Plan is in general conformity with the London Plan as confirmed by the GLA under the “General” subheading on page 2 of the Mayor’s Regulation 19 Response/General Conformity Statement (REP074 of Document **S9**). The Mayor does not raise any concerns about Policy SC3 in **S9** and there are no outstanding matters relating to Policy SC3 in the Council’s Statement of Common Ground with the Mayor (**EX5e**).

**Q4) Policy SC4 relates to the scale and density of new housing development, is it positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should address:**

**a) If compliance with the design-led approach in London Plan Policy D3 should be a requirement of development proposals?**

**Q4a) LBH Response:**

28. The Council considers the design-led approach in Policy D3 of the London Plan is reflected throughout the suite of Local Plan policies, including Policies CC1 and CC2 of the Plan. This approach is supported by robust and up-to-date evidence, specifically the Hounslow Characterisation and Growth Study 2024 (**EBCC2**)<sup>16</sup> and the Character, Sustainability and Design Codes SPD 2024 (**SPD1**)<sup>17</sup>.

**Q4b) Is it justified and consistent with other policies of the Plan to defer to design standards in Building Regulations? For effectiveness and consistency with national policy should it focus solely on the design standards otherwise set out in other policies of the development plan?**

**Q4b) LBH Response:**

29. Yes, the Council considers the requirement in Policy SC4 to meet standards in the recognised BRE 209 methodology is justified. The requirement to demonstrate compliance with specified standards in the BRE Guidance was found sound as part of the Examination of the adopted Hounslow Local Plan 2015-2030 (**ADP2**)<sup>18</sup>. The policy

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<sup>16</sup> EBCC2 - [Hounslow Characterisation and Growth Study \(2024\)](#)

<sup>17</sup> SPD1 - [Character, Sustainability and Design Codes SPD \(2024\)](#)

<sup>18</sup> ADP2 - [Adopted Hounslow Local Plan Volume 1 2015-2030](#)

requirement has been effectively implemented through the Development Management process, and the Council does not consider that the national and regional policy updates since the adoption of **ADP2** would impact the effectiveness of the requirement or its consistency with national policy.

**Q4c) Whether the expectations of development proposals should be clearer and cross refer to the detailed expectations of Policies CC1, CC2, CC3 and CC4 in terms of design, tall buildings and the historic environment insofar as they may be relevant to a new housing development?**

**Q4c) LBH Response:**

30. Policy SC4 focusses specifically on the scale and density of new housing development, whereas the Context and Character policies relate more widely to design and heritage.

31. As such, whilst the policies are related in so far as there are commonalities with many policies in the Plan, the focus of SC4 is more specific to housing densities.

**Q5) Policy SC5 seeks to ensure suitable internal and external space. Is it positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should address:**

**a) Taking account of the ongoing preparation of a new London Plan, for effectiveness would any changes be required to the expectations in terms of the minimum internal space standards otherwise specified in the Nationally Described Space Standard?**

**Q5a) LBH Response:**

32. The Council does not consider changes are required to Policy SC5 for effectiveness. The Towards a New London Plan consultation<sup>19</sup> released in May 2025 proposed that the London Plan continues to opt in to national standards with the same additional requirements regarding ceiling height and private outside space as the current London Plan 2021. Policy SC5 of the Plan requires proposals to meet, as a minimum, the Nationally Described Space Standards, and Policy D6 of the London Plan 2021 (**ADP1**).

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<sup>19</sup> [Towards a New London Plan, May 2025](#)

Accordingly, the higher threshold in Policy D6 must be met in order to satisfy Policy SC5 of the Plan. The Council considers the approach in SC5 is therefore effective.

**Q5b) Are the benchmark external space standards set out in Figure SC5.1 justified? If so, for effectiveness, should the detailed expectations be included in the policy wording?**

**Q5b) LBH Response:**

33. Yes. The Council refers to point 3 in the Notes section of Policy SC5 in the Plan which explains the justification for the Figure SC 5.1 standards with reference to the following documents in the examination library:

- EX1.20 – [Lifetime Homes Design Guide \(2004-2016\)](#)
- EX1.21 – [Housing Quality Indicators \(2008-2023\)](#)
- EX1.22 – [Mayor’s Housing SPG \(2016\)](#)
- EX1.23 – [Building for Life \(2012\)](#)
- EX1.24 – [RIBA Case for Space \(2011\)](#)

34. The Council considers the application of the Figure SC 5.1 standards has been effectively delivered through the Development Management process using Policy SC5 of the adopted Local Plan (**ADP2**), and therefore it is not necessary for the expectations of the standards to be included in the policy wording for effectiveness.

**Q5c) Would the implementation of the external space standards in Figure SC5.1 be compatible with the densities of development required to achieve efficient use of land on the proposed site allocations in the Plan?**

**Q5c) LBH Response:**

35. The wording in Policy SC5 that is linked to the external space standards in Figure SC5.1 provides sufficient flexibility that would ensure site allocation requirements, including minimum development quanta, can be met or exceeded. The minimum development quanta themselves have been calculated applying a density by design approach in order to optimise densities.

36. In order to enable flexibility, Policy SC5 includes a requirement in Part B that proposals should seek to meet the Figure SC 5.1 standards, unless it can be robustly demonstrated that this would not be possible due to site specific constraints. In addition, Part D requires proposals to demonstrate how the Figure SC 5.1 standards have been considered and allows flexibility for proposals to provide robust evidence to demonstrate where the benchmark standards cannot be met. This would allow site allocation requirements to be taken account of as justification for departing from the Figure SC 5.1 standards.

**Q6) Is the approach in Policy SC6 in terms of managing building conversions and sub-division of the existing housing; positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should address the following:**

**a) Whether the policy is justified and sufficiently clear to be effective in terms of the locations where properties will be preferred to remain as family housing or conversion to flats of more modest intensity of accommodation, together with the circumstances where such differentiation would apply?**

**Q6a) LBH Response:**

37. Part B of Policy SC6 provides flexibility in determining the suitability of locations for family housing or more intensive occupation such as Houses in Multiple Occupation (HMO) or several flats allowing for planning judgement on individual proposals, responding to local circumstances rather than a formulaic approach. The Council considers this is an effective approach allowing for discretion to be applied depending on the specific locality of the proposal and avoids being prescriptive about the localities where different intensities of development would be suitable. The policy requirement has been justified and effectively implemented through the Development Management process using Policy SC6 of the adopted Local Plan (**ADP2**), and the Council does not consider there is evidence to suggest that an alternative approach should be introduced.

**Q6b) What is the justification for the intended threshold of a property having a minimum 130 sq.m net original internal floor area to be considered suitable for conversion or subdivision, given that it seemingly exceeds the minimum floorspace for two units (including one family dwelling) under the Nationally Described Space Standard?**

**Q6b) LBH Response:**

38. The Council refers to the responses to Matter 3, Issue 2, Q3d.

**Q6c) Is the intended approach of not supporting conversion of residential properties that have previously been extended (or had outbuildings added) to create a total accommodation of at least 130sq.m, justified?**

**Q6c) LBH Response:**

39. Yes. The Council considers the conversion of residential properties that have been previously extended (or to which out-buildings have been added) to create a total accommodation of at least 130sqm could result in a level of intensification that would be harmful. Homes that are extended or include additional outbuildings as part of the total floor area often result in a denser form of development given that existing private residential garden space has been built on and therefore reduced in size. Such dwellings will also generally have smaller plot sizes given the original plot was used to construct a dwelling of less than 130 sqm. The Council considers the cumulative impact of such over-intensification through multiple-occupation would therefore be detrimental to the residential amenity and character of the surrounding area which should be avoided. The Council has also noted the definitions used in other London boroughs, such as Lambeth and Wandsworth, which apply the 130 sqm threshold to properties “*as originally constructed*”.

**Q6d) For effectiveness, are changes required to Part G to make clear that compliance with the internal and external space standards set out in Policy SC5 and London Plan Policy D6, and Part H in terms of living conditions as set out in Policy CC2, are not discretionary?**

**Q6d) LBH Response:**

40. The Council acknowledges that changes to Part G and Part H of the policy would make it clear that compliance with the policies that are cross referred to is not discretionary. If the Inspectors consider it necessary the Council would be amenable to a Main Modification to amend the wording “*have regard to*”, to “*be in accordance with*”, or similar.

**Q7) Policy SC8 relates to specialist and supported housing for older people and vulnerable people. Is it positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should address:**

**a) Having regard to the benchmark provision for housing for specialist older persons housing identified in Table 4.3 of the London Plan 2021 for 2017 - 2029, is the policy approach in general conformity and if not, is there justification for departing from the London Plan 2021?**

**Q7a) LBH Response:**

41. Yes. The Local Plan is in general conformity with the London Plan as confirmed by the GLA under the “General” subheading on page 2 of the Mayor’s Regulation 19 Response/General Conformity Statement (REP074 of Document **S9**). The Mayor does not raise any concerns about Policy SC8 in **S9** and there are no outstanding matters relating to Policy SC8 in the Council’s Statement of Common Ground with the Mayor (**EX5e**).

42. The Council refers to paragraph 4.13.8 of the London Plan 2021 (**ADP1**) which states research has identified a total potential demand in London for just over 4,000 specialist older persons units a year between 2017 and 2029, The annual benchmarks in Table 4.3 of **ADP1** are derived from this. Paragraph 4.13.9 goes on to explain that the Table 4.3 benchmarks are designed to inform local level assessments of specialist housing need and that boroughs should plan proactively to meet identified need for older persons accommodation. The Council has prepared a Local Housing Needs Assessment Update 2024 (**EBSC3**) which, within Section 5, includes Housing for Older People on pages 69 to 77 of the study. **EBSC3** provides a local level needs assessment that identifies the

specialist older persons housing needs and care home bed spaces required in the borough over the plan period. This has informed the policy approach in SC8.

**Q7b) Whether the intended contribution of 17 care and nursing home bedspaces per annum is justified relative to identified need over the Plan period and is it in general conformity with the London Plan?**

**Q7b) LBH Response:**

43. Yes. The Council refers to the response to Q7a of Matter 3 Issue 2. Paragraph 4.13.14 of the London Plan 2021 (**ADP1**) discusses supply and demand for care home accommodation on a London-wide basis. The Local Housing Needs Assessment 2024 (**EBSC3**) provides a robust locally specific assessment of a range of local housing needs including care and nursing home bedspace needs in the borough. Paragraph 5.48 of **EBSC3** explains how the projected needs for the plan period have been identified and defines the overall need from 2020-2041, which equates to 17 bed spaces per annum. The approach is therefore justified, based on Hounslow specific evidence.

**Q7c) If the policy should be clearer in terms of what locations would be suitable for care and nursing home bedspaces if not allocated in the Plan? Should it be more specific in terms of what would constitute 'good' public transport accessibility?**

**Q7c) LBH Response:**

44. The Council's view is that supporting such proposals where they are appropriately located in an area with good public transport accessibility is a sound approach. Planning judgement can be used on individual proposals in consideration of the appropriateness of their location, responding to local circumstances. This approach is considered to be positive and effective as it avoids potentially suitably located proposals being refused because they do not fall within specific localities. The approach also avoids edge cases being refused which could occur through, for example, requiring a specific Public Transport Access Level rating in order to be considered.

**Q7d) Whether the policy and the Plan as a whole, is in general conformity with London Plan Policy H12 and is positively prepared, effective and consistent with national policy in terms of addressing any identified needs for other forms of supported and specialist accommodation?**

**Q7d) LBH Response:**

45. Yes. The Local Plan is in general conformity with the London Plan as confirmed by the GLA in the Mayor's Regulation 19 Response/General Conformity Statement (REP074 of Document **S9**) and reiterated in the Council's Statement of Common Ground with the Mayor (**EX5e**). The Plan is in general conformity with, and does not depart from, the approach in Policy H12 of **ADP1**. The Council also considers Policy H12 does not necessarily refer to plan making activities, rather sets out the general approach boroughs and planning applications should take in relation to supported and specialist accommodation, including examples of supported and specialised housing types are not a definitive list. Notwithstanding this, a large number of the supported types of housing H12 says could be included in a needs assessment were considered in the Local Housing Needs Assessment 2024 (**EBSC3**) with associated policy approaches in the Plan.

46. Policy SC8 and the Plan as a whole is also positively prepared, effective and consistent with national policy, including paragraph 63 of the NPPF. **EBSC3** provides a robust locally specific assessment of a range of local housing needs including for the groups referred to in the NPPF. Some of these groups such as military personnel (service families) and other essential key workers are considered in paragraphs 5.82 to 5.84 of the study, where it concludes such households are already accounted for in identified affordable housing needs.

47. Policy SC10 takes a positive approach to the provision of accommodation that meets the needs of young and working age residents who have complex health and social care needs, which is supported by paragraph 5.91 of **EBSC3**. SC10 also includes a positive approach to temporary and emergency accommodation that is informed by **EBSC3**. Temporary and emergency accommodation covers a wide bracket including housing for rough sleepers, and victims of domestic abuse, or other types of violence.

Requirements for provision of wheelchair user housing informed by wheelchair housing nominations where applicable, are set out in Policy SC2. Family housing, including for families with children, is considered as part of the overall assessment of affordable housing needs, delivered through Policy SC2.

**Q7e) Whether the requirements for affordable housing identified under Part D of Policy SC8 are in general conformity with London Plan Policy H13, or otherwise justified?**

**Q7e) LBH Response:**

48. Yes. Point one of the Supporting Facts in Policy SC8 applies the London Plan 2021 (**ADP1**) definition of Specialist Older Persons Housing (SOPH) and point two explains the sub-categorisation of this definition used within **EBSC3**, which is reflected in Policy SC8. As such, the definition for SOPH is consistently applied in both the London Plan and Local Plan. Part B of Policy H13 of the London Plan states that specialist older persons housing provision should deliver affordable housing in accordance with Policy H4 and Policy H5. The approaches of policies H4 and H5 of the London Plan are directly reflected in Policy SC2 of the Local Plan. Part D of Policy SC8 requires Specialist Older Persons Housing to deliver affordable housing in accordance with Policy SC2 of the Plan, and the approach is therefore in general conformity with the London Plan.

49. Policy SC10 takes a positive approach to the provision of accommodation that meets the needs of young and working age residents who have complex health and social care needs, which is supported by paragraph 5.91 of **EBSC3**. SC10 also includes a positive approach to temporary and emergency accommodation that is informed by **EBSC3**.

**Q8 Is the approach in Policy SC10 in terms of housing in multiple occupation (HMO), hostels, bed and breakfast, temporary and emergency accommodation; positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should address:**

**a) If the policy should be clearer in terms of what locations would be suitable for HMOs, hostels and bed and breakfast accommodation, and purpose built or retrofitted temporary emergency accommodation if not allocated in the Plan, and is it justified if it differs from London Plan Policy H1?**

**Q8a) LBH Response:**

50. Policy SC10 provides flexibility in determining the suitability of locations for HMO, hostels, B&Bs, and temporary and emergency accommodation. Parts F and H of the policy provide indicators for the locations that would be considered suitable allowing for planning judgement on individual proposals, responding to local circumstances rather than a formulaic approach. The Council considers this is an effective approach allowing for discretion to be applied depending on the specific locality of the proposal and avoids being prescriptive about the localities where different intensities of development would be suitable. The policy requirement has been justified and effectively implemented through the Development Management process using Policy SC10 of the adopted Local Plan (**ADP2**), and the Council does not consider there is evidence to suggest that an alternative approach should be introduced.

51. The Council does not consider that Policy SC10's approach differs from Policy H1 of **ADP1**). The approach in Part 2 of Policy H1 is reflected in SC10, in that the types in development referred to in Policy SC10 of the Local Plan are directed to town centres and areas of good public transport accessibility, but a qualitative rather than quantifiable approach is taken, which has proved effective in a local context.

**Q8b) For effectiveness, should the policy make clear what would constitute 'good' public transport accessibility, 'close proximity' to a designated town centre or a large neighbourhood centre, and what 'convenient walking distance' of town centre facilities would be?**

**Q8b) LBH Response:**

52. No. The Council refers to the response to Q8a above. The Council's view is that supporting such proposals where they are appropriately located in an area with good public transport accessibility, close to a town centre or large neighbourhood centre is a sound approach. Planning judgement can be used on individual proposals in consideration of the appropriateness of their location, responding to local circumstances. This approach is considered to be positive and effective as it avoids

potentially suitably located proposals being refused because they do not fall within specific localities. The approach also avoids edge cases being refused which could occur through, for example requiring a specific Public Transport Access Level rating in order to be considered.

**Q8c) Whether the requirement for HMOs to accord with Policy SC5 is justified?**

**Q8c) LBH Response:**

53. Yes. The requirement in Part G of Policy SC10 of the Plan to make appropriate provision for outdoor or amenity space, in accordance with Policy SC5 is justified on the same basis as the requirements for all new housing development in Policy SC5. See the Council's response to Q5b. The Council seeks to promote good quality HMO accommodation in Hounslow and considers residents' access to outdoor amenity space to be integral to the quality and experience of the accommodation.

**Q8d) Whether the threshold of a minimum 'original' floor area greater than 130sq.m to be suitable for conversion into a non-family HMO, hostel and bed and breakfast accommodation is justified? Why does it need to be 'original' floorspace?**

**Q8d) LBH Response:**

54. The defined minimum size of 130 sqm for a large family house used in Policy SC3 and SC6 of the Plan is also applied in Policy SC10, for consistency, and to avoid having two separate definitions for a large family home in the Plan. The Council refers to the response to Matter 3, Issue 2, Q3d which explains the justification for the definition.

**Q8e) Whether the expectation that purpose built or retrofitted temporary emergency accommodation proposals have regard to the Morrison + Company Family Emergency Accommodation Guidance document is justified and effective?**

**Q8e) LBH Response:**

55. Yes. Policy SC10 includes a positive approach to temporary and emergency accommodation that is informed by identified needs in **EBSC3**. It is a priority for Hounslow Council that all local people including vulnerable people in temporary and emergency accommodation have a good quality place to call home. The evidence in **EBSC3** demonstrates there were 564 households in temporary emergency accommodation in communal establishments in Hounslow at the time of the Study's preparation. To help ensure future temporary and emergency accommodation for families is good quality, Policy SC10 encourages relevant applications to have regard to Morris + Company Family Emergency Accommodation Guidance (**EX1.27**<sup>20</sup>) which is the most up-to-date available guidance for such accommodation, and takes account of best practice precedents in a London context. The Council refers to page 5 of **EX1.27**, which sets out the methodology used in the study.

**Q9 Policy SC11 relates to other forms of housing; is it positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should address:**

**a) If the policy should be clearer in terms of what locations would be suitable in principle for purpose-built student accommodation and build to rent if not allocated in the Plan, and is it justified if it differs from locations identified in London Plan Policy H1?**

**Q9a) LBH Response:**

56. The Council considers Policy SC11 is clear with regard to suitable locations for student accommodation. The general approach provides some flexibility, though Part G of Policy SC11 more specifically, which requires student accommodation proposals to be located within a minimum of PTAL 4.

57. Part A of SC11 requires proposals to be in an area with good public transport accessibility with access to local conveniences, and paragraph 5.54 in the supporting text to the policy provides further clarification that proposals should be located within or close to town centres, or other locations that benefit from good provision of shops,

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<sup>20</sup> EX1.27 – [Morris + Company Family Emergency Accommodation Guidance](#)

services, leisure and community facilities appropriate to a student population. This approach allows for a degree of planning judgement on individual proposals, responding to local circumstances. The Council considers this is an effective approach allowing for discretion to be applied depending on the specific locality of the proposal and avoids being too prescriptive.

58. The Council considers Policy SC11 is in general conformity with Policy H1 of the London Plan 2021 (**ADP1**). The approach in Part 2 of Policy H1 is generally reflected in SC11, in that the types of development referred to in Policy SC11 of the Local Plan are directed to town centres and areas of good public transport accessibility. With specific regard to PTAL, the Council accepts that the lowest acceptable threshold referred to in Policy H1 of the London Plan (PTAL3) differs from the lowest threshold referred to in Policy SC11 (PTAL4), and considers there is justification for the difference in approach.

59. Policy H1 of **ADP1** sets out the strategic approach to housing generally, whereas Policy SC11 of the Local Plan is non-strategic and focuses on specific types of higher intensity housing, including student accommodation and large-scale purpose-built shared living (LSPBSL) accommodation. Part B of Policy H15 of **ADP1** encourages boroughs to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes. Student accommodation is a high intensity use where occupants frequently need to travel for services and their education. Given that Hounslow does not host any large university campuses, with only one satellite campus in Brentford, there is an even greater likelihood of frequent travel to places that are not walking distance from student accommodation. The requirement for student accommodation to be located in areas of PTAL 4 or above is therefore justified based on local circumstances and consistent with Policy H15 of the London Plan.

60. Both Policy H11 of the London Plan and Policy SC11 of the Local Plan do not include specific requirements for the location of Build to Rent housing; the Plan is therefore consistent with **ADP1**. It is not considered necessary for Policy SC11 to repeat requirements for location of sites as set out in Policy H1 of **ADP1**.

61. Part A3 of Policy H16 of **ADP1** requires LSPBSL accommodation to be located in an area well-connected to local services and employment by walking, cycling and public transport, and to have a design that does not contribute to car dependency. Part P II of Policy SC16 requires proposals for LSPBSL accommodation to be in an accessible location that is entirely within a PTAL of 4 or higher, and which can absorb intensive usage. The Council considers this is consistent with the requirements for LSPBSL accommodation in Policy H16 of **ADP1**, and is therefore justified.

**Q9b) Whether it is justified and consistent with national policy in requiring that proposals for purpose-built student accommodation would not generate additional demand for on-street parking?**

**Q9b) LBH Response:**

62. Yes. The Council refers to paragraphs 112 and 113 of the NPPF (2023) which allow plan making authorities to set maximum parking standards where there is clear and compelling justification that they are necessary. Part E of Policy T6.1 of the London Plan 2021 (**ADP1**) introduces car parking standards that require purpose built student accommodation to be car-free. Furthermore, Policy SC11 of the Local Plan requires purpose built student accommodation proposals to be situated within sustainable locations of PTAL 4 or higher. The Council considers that it is therefore justified through **ADP1** that residents of purpose built student accommodation should not generate additional parking requirements, and that Parts A and G in Policy SC11 of the Local Plan assist in implementing this approach. The policy approach is therefore justified and consistent with national policy. It should also be noted that the requirement was found sound as part of the Examination into the adopted Hounslow Local Plan 2015-2030 (**ADP2**) and is included in Part B of SC11 in **ADP2**.

**Q9c) If the policy should be clearer in terms of the detrimental impacts on the local area that are sought to be avoided by proposals for purpose-built student accommodation?**

**Q9c) LBH Response:**

63. The Council does not consider changes are needed to Policy SC11. Part D of SC11 also explains that an agreed management and maintenance plan for the accommodation will

be required to demonstrate how the amenity of neighbouring properties will be protected. It is therefore sufficiently clear that the detrimental impacts referred to relate to the amenity of the local area. Paragraph 5.58 in the supporting text to Policy SC11 provides further detail, explaining that the occupation and use of the student development should be compatible with the amenity of neighbouring occupiers and character of the area.

**Q9d) With regard to proposals for build to rent should closer links be drawn to London Plan Policy H11 to ensure general conformity with it?**

**Q9d) LBH Response:**

64. No. The Local Plan is in general conformity with the London Plan as confirmed by the GLA in the Mayor's Regulation 19 Response/General Conformity Statement (REP074 of Document **S9**) and as reiterated in the Council's Statement of Common Ground with the Mayor (**EX5e**). The Council considers that there is a clear link between SC11 and Policy H11 of the London Plan (**ADP1**), with regard to the approach to Build to Rent. In particular, the requirements in Part O of Policy SC11 are reflective of the requirements in Policy H11 of **ADP1**.

65. With regard to affordable housing requirements for Build to Rent proposals, Part O of Policy SC11 is also consistent with Policy H11 of **ADP1**. The discounted market rent levels referred to in Policy H11 of **ADP1** can be set at a mix of London Living Rent and Affordable/Social Rent, in accordance with paragraph 4.11.10 of the supporting text to Policy H11 in **ADP1**. The Local Housing Needs Assessment Update 2024 (**EBSC3**) demonstrates an acute need for social rent and affordable rent housing in Hounslow that amounts to almost 70% of the affordable housing needs and 50% of the total overall housing needs in the borough (Figure 51 of **EBSC3**). The Council considers this acute need justifies the approach it has taken to the delivery of affordable housing for Build to Rent in Policy SC11 of the Plan. The approach is therefore in general conformity with the London Plan.

**Q9e) Whether the approach indicating that large-scale purpose-built shared living accommodation is not suitable, except in exceptional circumstances, due to an extremely limited need - is justified? Are they exceptional circumstances or specific circumstances that are listed at Part F? Are those specific circumstances justified?**

**Q9e) LBH Response:**

66. Yes. The Council refers to paragraphs 5.53 to 5.61 of the Local Housing Need Assessment 2024 (**EBSC3**), which provides justification for the approach taken in Policy SC11 in regards to large-scale purpose-built shared living (LSPBSL) accommodation. The evidence in **EBSC3** demonstrates there is very limited need for LSPBSL accommodation in Hounslow, and the Council considers it is important that emerging Policy SC11 is reflective of this, to ensure the policy is justified, based on evidence of local need. The Council also considers the approach to LSPBSL accommodation in SC11 is effective and positively prepared as the policy enables proposals to demonstrate where there is a specifically identified local market demand for LSPBSL accommodation with independently prepared evidence. In such cases, where proposals would not constrain the delivery of conventional residential uses, they would be considered against the criteria in Part P of Policy SC11.
67. With Regard to Part F of Policy SC11, the term ‘exceptional’ is used given the evidence in **EBSC3** demonstrates there is extremely limited need for LSPBSL accommodation in Hounslow, and therefore there is an expectation that such proposals are unlikely to be suitable in the borough. The justification for this approach is informed by the evidence in **EBSC3**. The requirement for proposals not to constrain the delivery of conventional residential uses is also justified through the findings of **EBSC3**, which demonstrates the greatest need in Hounslow is for 3+ bedroom family homes in both the social/affordable rent and market housing tenure categories at 57% and 61% of total dwelling sizes respectively. This is reflected in Table SC 3.1 in Policy SC3 of the Plan. A less conservative policy approach to the provision of LSPBSL accommodation would therefore have an impact on the Council’s ability to address the borough’s most acute housing needs and achieve mixed and inclusive neighbourhoods. It is also crucial to

protect the delivery of general housing in order to ensure affordable housing needs can be met.

**Q9f) With regard to proposals for large-scale purpose-built shared living accommodation should closer links be drawn to London Plan Policy H16 to ensure general conformity with it?**

**Q9f) LBH Response:**

68. No. The Council refers to its response to Q9e. Having regard to local evidence (**ESBC3**), it is justified and effective for the approach to LSPBSL accommodation in Policy SC11 to depart from Policy H16 of the London Plan (**ADP1**). Notwithstanding, in the exceptional circumstances set out in Policy SC11, where LSPBSL proposals are considered against the criteria in Part P, there is a clear link between SC11 and Policy H16 of **ADP1**. Part P VII also requires proposals to accord with any relevant guidance published by the Mayor of London.

**Q9g) Are there any additional requirements set out in the supporting text that are not reflected in the policy wording, are they justified in the context of the London Plan 2021 and should they be included within the policy for effectiveness?**

**Q9g) LBH Response:**

69. With regard to affordable housing requirements for LSPBSL proposals, Part P VI of Policy SC11 requires LSPBSL accommodation proposals to provide a commuted sum in lieu of the provision of on-site affordable housing. Paragraph 5.68 of the supporting text to Policy SC11 of the Plan encourages on-site affordable housing where possible, which is the Council's preferred delivery method. The Council recognises that Part 9 of Policy H16 in **ADP1** requires a cash in lieu contribution towards conventional C3 affordable housing to be provided off-site. As such, the policy approach in SC11 seeks to encourage applicants to deliver on-site affordable housing but to ensure consistency with Policy H16 of **ADP1**, allows proposals to provide a commuted sum in lieu of the provision of on-site affordable housing where on-site affordable housing is not achievable. It is considered that the positive wording to encourage applicants to provide

on-site affordable housing is therefore most appropriately cited in the supporting text to the policy, as it is not a policy requirement.

**Q10) Is the approach of Policy SC1 in offering support for proposals for self-build and custom housebuilding, sound and in general conformity with the London Plan 2021?**

**Q10) LBH Response:**

70. The London Plan 2021 (**ADP1**) does not include policies relating to self-build and custom housebuilding. There is also no specific direction in the **ADP1** to require boroughs to refer to these types of housing in their Plans. Furthermore, **ADP1** does provide policy support for custom, self-build and community-led housing in Policy H2.

71. The Self-build and Custom Housebuilding Act 2015 (as amended) introduced an obligation on local authorities to maintain a register of people and associations who seek to build their own homes within the authority. Whilst the entrants on Hounslow's Self Build Register represent an exceptionally small proportion of the borough's housing need, in order to address the requirements of the 2015 Act, the Plan takes a positive approach to support proposals for self-build and custom housebuilding development. Having regard to land availability in the borough, as identified in the Site Allocations and Capacity Assessment 2024 (**EBSC2**) the requirement in Policy SC1 provides support, subject to the proposals making efficient use of land through optimising housing densities as far as is appropriate in the context of the site. The Council considers this is a well-balanced approach, having regard to the 2015 Act and **ADP1**.

**Q11) Policy GB6 relates specifically to residential moorings; is the approach justified, consistent with national policy, and in general conformity with the London Plan 2021, and are the requirements of development proposals sufficiently clear to be effective for decision making?**

**Q11) LBH Response:**

72. Provisions set out in the Housing and Planning Act include a duty (under Section 124 of the Housing and Planning Act 2016<sup>21</sup> which amends Section 8 of the 1985 Housing Act) for local authorities to consider the needs of people residing in, or resorting to, their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored.

73. Needs for boat dwellers are considered in paragraphs 5.85 – 5.90 of the Local Housing Needs Assessment 2024 (**ESBC3**). The Study identifies there were 135 houseboats recorded for Council Tax in Hounslow in November 2022. However, **ESBC3** goes on to conclude that the role of additional mooring in meeting housing needs in Hounslow is likely to be small and therefore any additional permanent moorings would form part of the existing housing need and not be an addition to it. It is therefore considered that Hounslow Council has complied with the requirement under Section 124 of the Housing and Planning Act 2016 in relation to inland waterways where houseboats can be moored.

74. Notwithstanding this, the Council considers it is pragmatic that a policy framework is in place for residential moorings in the borough, given there is evidence of houseboats in Hounslow as demonstrated in **ESBC3**. This is consistent with the approach in Policy SI16 of the London Plan 2021 (**ADP1**), which is supportive of residential moorings provided proposals consider innovative solutions to address site-specific conditions, to enable the creation of new appropriate moorings without detrimentally impacting on navigation. It is also the Council's view that the policy requirements in GB6 are clear. Policy GB6 of the Plan is therefore justified and consistent with national policy and the London Plan (**ADP1**).

**Issue 3: Whether the Plan is positively prepared, justified, effective, consistent with national policy, and in general conformity with the London Plan, in its approach to meeting needs for Gypsy, Traveller and Travelling Showpeople accommodation?**

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<sup>21</sup> [Section 124 of the Housing and Planning Act 2016](#)

## Questions:

**Q1) Is the approach in Policy SC9 and to the related allocations consistent with the Planning Policy for Traveller Sites (PPTS) insofar as it expects plans firstly, to identify a supply of specific deliverable sites to provide 5 years' worth of sites against locally set targets; and secondly, to identify a supply of specific, developable sites, or broad locations for growth for years 6 to 10 and, where possible, for years 11 to 15?**

## Q1) LBH Response:

75. The Council has worked positively and extensively to identify a sufficient land supply of deliverable and developable sites to meet its pitch and plot targets, and indeed the full need for GTTS pitches and plots identified in the West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Final Report 2019 (**EBSC5**)<sup>22</sup>. Part A of Policy SC14 of the London Plan (**ADP1**)<sup>23</sup> is clear that boroughs must include ten-year pitch targets in their Development Plan Documents. The Council has proposed 5 specific modifications in the Schedule of Suggested Modifications (**S11**)<sup>24</sup> to include its 10 year pitch and plot targets in Policy SC9 and its supporting text, which are informed by the identified needs in **EBSC5**. The relevant proposed modifications are **HLP\_C5\_05**, **HLP\_C5\_07**, **HLP\_C5\_09**, **HLP\_C5\_10** and **HLP\_C5\_11**. These were agreed with the Mayor in the Statement of Common Ground (**EX5e**)<sup>25</sup>. The borough's target for Gypsy and Traveller pitches is 26 and the target for Travelling Showpeople plots is 12.

76. The Plan's approach to meeting the 10 year targets is to deliver a new Gypsy and Traveller site containing 20 pitches and a new Travelling Showperson site containing 12 plots, both through site allocations (allocation site references 120 and 121 respectively). Policy SC9 of the Plan also seeks to expand the existing Council owned Hartlands site to provide 6 additional pitches, meeting the remainder of the 10 year pitch target for Gypsies and Travellers. Further detail is added in proposed modifications **HLP\_C5\_07** and **HLP\_C5\_11** in **S11**, which are also both agreed with the Mayor in the Statement of Common Ground (**EX5e**), including referring to site intensification at Hartlands as well as the reference to 'expansion' in the submitted Plan.

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<sup>22</sup> EBSC5 - [West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Final Report \(2019\)](#)

<sup>23</sup> ADP1 - [London Plan \(2021\)](#)

<sup>24</sup> S11 - [Schedule of Suggested Modifications](#)

<sup>25</sup> EX5e – [Statement of Common Ground between LB Hounslow and the Mayor of London \(October 2025\)](#)

77. With regard to the identification of a supply of specific deliverable and developable sites, the Council has undertaken a rigorous and exhaustive search to identify all potential sources of GTTS sites. Much of this process is documented in the Hounslow Site Allocations and Capacity Assessment (SACA) - GTTS Addendum 2024 (**EBSC2a**<sup>26</sup>), which was produced in July 2024, however, the key steps taken are summarised as follows:

#### **Call for Sites and Land Searches**

78. Call for sites exercises for all uses were undertaken in 2016 and 2017. No sites were submitted for Gypsy and Traveller provision through these exercises. An internal site search was also undertaken by the Council simultaneously, which identified a travelling Showperson site located in Beyber Bridge, near Feltham as a potential site. This site has since been excluded from the search as it includes 11 existing traveller Showperson plots, which though previously considered to be unauthorised but tolerated by the Council, have now been established for a sufficient period of time that the site is considered to be authorised. Site visits demonstrated that there is no capacity for expansion or intensification at the now established Travelling Showperson site.
79. Land adjoining the existing Hartlands Gypsy and Traveller site, south of Church Road, Cranford was also identified through this exercise as a site with potential to accommodate 3 new Gypsy and Traveller pitches. This site has also since been excluded from the search as set out in **EBSC2a**, due to access and landform constraints that resulted in the site failing the suitability test.
80. In 2022, the Council undertook a targeted Call for Sites specifically seeking to identify GTTS sites in the borough. This was promoted on the Council's website, corresponding engagement portal, and to consultees on the Planning Policy consultation database (including statutory consultees, developers, landowners, and local and regional GTTS organisations and groups). At the same time the Council undertook an internal review of its own land and assets, as well as land in the borough not owned by the Council, with the objective of identifying land that could be used to deliver GTTS sites. Through these

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<sup>26</sup> EBSC2a - [Hounslow Site Allocations and Capacity Assessment \(SACA\) Gypsy, Traveller and Travelling Showpeople Addendum \(2024\)](#)

exercises, 2 sites were submitted by private landowners and 26 sites were identified for assessment through the analysis of both Council owned and privately owned land in the borough. The results of these exercises are documented in the **EBSC2a**, which is discussed under the relevant subheading below.

#### **Engagement with GTTS Representation Groups**

81. In spring and summer 2022, officers of the Council met with the London Gypsies & Travellers group who represent Gypsies, Roma and travellers in the Capital, and the Showmen's Guild of Great Britain who represent travelling showpeople nationwide. Officers explained the initial results of the Call for Sites and site search exercises and sought input from both groups on the approach taken and sites identified, as well as pitch and plot sizes. This enabled views from representatives of the communities to be accounted for.

#### **Engagement with Community**

82. The site search exercise had not identified Travelling Showperson sites that were in close proximity to the existing sites in the borough located in Feltham, where it was understood the community wanted to remain owing to their longstanding presence in the town. To address any concerns about this, in May 2022 officers of the Council met with Travelling Showpeople living on existing sites in the borough to discuss the process being undertaken to identify sites to meet their housing needs. Officers presented the findings of the site search exercise to members of the community and took account of their feedback.

#### **Hounslow Site Allocations and Capacity Assessment (SACA) Gypsy, Traveller and Travelling Showpeople Addendum (2024)**

83. Document **EBSC2a** was produced in July 2024 and the Council considers it a robust and up-to-date assessment of land to meet GTTS needs. The Study was informed by the targeted Call for Sites for GTTS needs from Spring 2022, the Council's review of its own land and assets, the Council's review of privately owned land in the borough, and engagement with representation groups and the community.
84. The Study reviewed a total of 28 sites. Two of these sites were submitted to the Council through the 2022 targeted Call for Sites, and 26 sites were identified through the

Council’s own land analysis for potential candidates that could be suitable, available and achievable for development at GTTS sites. Of the sites assessed, two sites met all of the suitability, availability and achievability tests and these are both allocated in the Plan (site references 120 and 121). Table 7.1 of **EBSC2a** illustrates why 2 other sites were screened out from the Study. The table in paragraph 9.4 of **EBSC2a** provides summaries for why 24 of the sites assessed were not taken forward, whilst the full detailed site assessments are included in Appendix 1 of the Study. Table 9.1 of **EBSC2a** illustrates the two sites that met the suitability, availability, achievability tests, which are the sites that have been allocated to deliver GTTS pitches and plots in the Plan. It should be noted that Table 9.1 of **EBSC2a** was mistakenly named “Sites Screened out from Assessment” and it should instead be named “Deliverable/Developable Sites”.

### **Engagement through the Duty to Cooperate**

85. Throughout the duration of the plan-making process the Council has engaged in effective and on-going engagement with neighbouring authorities and other prescribed bodies in relation to cross-boundary strategic matters, as required under the duty to co-operate. The Council have asked neighbouring authorities whether they would be able to assist in helping to meet Hounslow’s unmet need for GTTS accommodation, however, neighbouring authorities have all confirmed that they would not have any spare capacity to assist Hounslow with the delivery of GTTS pitches or plots on sites within their areas. The Duty to Cooperate Statement (**S10**<sup>27</sup>) provides an overview of the engagement undertaken with each authority, and these positions are set out within the Statements of Common Ground agreed with each neighbouring authority (see documents S10b, EX5c, EX5d, EX5f and EX5g).

### **Conclusion**

86. As demonstrated in **EBSC2a** and set out in Policy SC9 of the Plan (with relevant modifications for clarification), the Council has sufficient sites to meet its 10 year London Plan target for Travelling Showpeople plots. Table 10.1 of **EBSC2a** also demonstrates the Council is able to identify a supply of deliverable sites to provide 5 years’ worth of sites; and has identified a supply of developable sites for years 6 to 10.

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<sup>27</sup> S10 - [Duty to Cooperate Statement](#)

87. Table 10.1 of **EBSC2a** shows that despite identifying (and allocating) a 20 pitch Gypsy and Traveller site, there is a shortfall of 3 pitches during years 0-5 (deliverable) and 3 pitches during years 6-10 (developable). Correspondingly, this would also result in a shortfall of 6 pitches against the 10 year London Plan target for Gypsies and Travellers.

88. In order to address this, the Council has included a policy approach in SC9 to expand the existing Council owned Hartlands site to provide 6 additional pitches, meaning the 10 year target and the identified deliverable (years 0-5) and developable (years 6-10) needs would be met. Furthermore, as set out in proposed modifications **HLP\_C5\_07** and **HLP\_C5\_11** in **S11**, it is intended that the approach in Policy SC9 should refer to both expansion and/or intensification at the Hartlands site.

89. To meet identified GTTS needs after year 10, Part F of Policy SC9 of the Plan includes positively worded criteria to help support the delivery of additional provision on non-allocated sites. The Council refers to the response to Q7 of Matter 3, Issue 3.

**Q2) To what extent are the West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (WL-GTAA) and the Hounslow Site Allocations and Capacity Assessment (SACA) - Gypsy Traveller and Travelling Showpeople Accommodation Assessment Addendum (2024) considered to:**

**a) Provide a robust assessment of need and is the evidence, sufficiently up-to-date and reflective of current circumstances?**

**Q2a) LBH Response:**

90. The WL-GTAA 2019 2 Study (**EBSC5**) is considered to be robust and up-to-date. **EBSC5** was prepared by Opinion Research Services (ORS), who have considerable experience in the preparation of such assessments and have refined their methodology on an ongoing basis in response to changes in policy and guidance, in addition to wider practice. The ORS methodology has been repeatedly found sound and robust, including through a number of Local Plan Examinations.

91. The Council considers that **EBSC5** remains up to date. The study provides a comprehensive assessment of need through to 2041 and in doing so, covers the full extent of the Plan period.

92. The definition in Annex 1 of the Planning Policy for Travellers Sites (PPTS) 2015 version, excluded GTTS who had permanently ceased to travel. The PPTS Annex 1 definition of gypsies and travellers and travelling showpeople has since been updated in the December 2023 version and now in the current version of the [PPTS \(December 2024\)](#) (**EX1.26**). The 2023 update reintroduced the inclusion of those who have permanently ceased to travel within the definition, and the 2024 update expanded the definition further to include “*all other persons with a cultural tradition of nomadism or of living in a caravan*” within the definition.
93. Though **EBSC5** was prepared prior to these updates to the 2015 version of the PPTS, the Study includes identified needs for GTTS who meet and do not meet the 2015 definition, and correspondingly, the Council’s approach in the Plan accommodates the needs of both those who do and do not meet the PPTS 2015 definition. Accordingly, both **EBSC5** and the Plan are consistent with the definition in the current PPTS (**EX1.26**).
94. The Study also considers those in bricks and mortar housing. The Council refers to paragraphs 3.18-3.20 of **EBSC5**, which set out the rigorous approach taken to making contact with bricks and mortar households, including publicising the work being undertaken and seeking contacts through a range of sources including the interviews with people on existing sites, intelligence from the stakeholder interviews, information from housing registers and local knowledge from other stakeholders. **EBSC5** confirms it does not make assumptions in respect of the overall needs arising from households in bricks and mortar as this can lead to a significant over-estimate of the number of households wishing to move to a site or yard.
95. As set out at Paragraph 1.7 of **EBSC5**, a combination of desk-based research, stakeholder interviews and engagement with members of the GTTS communities living on all known sites was undertaken. The Council refers to Figure 22 of **EBSC5** which summarises the number of interviews that took place on sites and yards in Hounslow.
96. The Hounslow Site Allocations and Capacity Assessment (SACA) - GTTS Addendum (**EBSC2a**) is an assessment of land supply, rather than need. The Council refers to the

response to Q1 of Matter 3 Issue 3, where the robustness and of the Study is discussed.  
The study was produced in July 2024 and is considered up-to-date.

**Q2b) Provide sufficient justification for any changes in numbers of Gypsies and Travellers or Travelling Showpeople now resident in the Borough?**

**Q2b) LBH Response:**

97. The Council refers to the responses to Q1 and Q2a of Matter 3 Issue 3.

**Q2c) Provide justified assumptions for new household formation rates and is there any evidence of concealed households, overcrowding on existing sites, or pitches or plots that should be accommodated in the Borough?**

**Q2c) LBH Response:**

98. The Council refers to section 7 of **EBSC5**, in particular paragraphs 7.4 to 7.14 which explain the approach taken in the study to calculate new household formation rates. ORS are clear that household formation rates should use a robust local evidence base, rather than relying on national precedent. Drawing on extensive experience in undertaking GTTS Accommodation Assessments, ORS has developed a Technical Note on GTTS Household Formation and Growth Rates (Appendix F of **EBSC5**), which concludes that best available evidence suggests the net annual GTTS household growth rate is 1.50% per annum, but that this rate should be adjusted as appropriate, taking into account local demographic characteristics.

99. As set out in Paragraphs 7.8-7.10 of the **ESBC5**, the approach taken by ORS has been found to be sound in a number of appeals and the Technical Note has been accepted as robust academic evidence by the Social Research Association in its journal Social Research Practice. Accordingly, the Council considers that the household growth rate of between 2.5% and 2.75% for Gypsy and Travellers (depending on whether or not they meet the definition in Annex 1 of the PPTS 2015) and 0.85% for travelling showpeople (or

use of demographics in cases where households do not meet the definition in Annex 1 of the PPTS 2015) are justified.

100. Section 3 of **EBSC5** sets out in detail the methodology followed for assessing need, including how ORS have considered existing provision, household growth, bricks and mortar households, unauthorised sites and engagement with the GTTS communities. This led to needs being assessed from a comprehensive range of sources including:

- Households on unauthorised developments or encampments
- Households on sites with temporary planning permission
- Concealed households/Doubling-up/Over-crowding
- Movement from bricks and mortar
- Households on waiting lists for public sites
- 5 year need for teenage children
- In-migration
- Households on sites with temporary planning permission
- New household formation

101. Figures 50, 86 and 110 of **EBSC5** set out and quantify the different sources of need for Gypsy and Traveller pitches in Hounslow and Figures 52, 88 and 112 set out the different sources of need for Travelling Showperson plots in Hounslow. Each figure includes a category for need arising from Concealed households/Doubling-up/Over-crowding. With regard to Gypsies and Travellers, 1 of the total pitches needed in Hounslow is shown to derive from this element of need. For Travelling Showpeople, 4 of the total plots needed in Hounslow are shown to derive from this element of need.

**Q3) The Plan seeks to allocate 20 new pitches for Gypsies and Travellers and 12 plots over the Plan period of 2020 to 2041. Is there evidence that some of the identified need in Figure 49 of the WL-GTAA (EBSC5) had already been met through delivery of additional pitches and plots between 2016 and 2025?**

**Q3) LBH Response:**

102. Figure 49 of the WL-GTAA 2019 (**EBSC5**) explains the status of existing Gypsy and Traveller and Travelling Showpeople (GTTS) households in Hounslow in relation the definition in Annex 1 of the Planning Policy for Travellers Sites (PPTS) 2015 version, and it should be noted the figure is not evidence of identified need.
103. The identified needs for Gypsies and Travellers who both meet and do not meet the PPTS 2015 definition are summarised in Figures 51 and 111 of the WL-GTAA 2019 (**EBSC5**), and the identified needs for Travelling Showpeople who both meet and do not meet the PPTS 2015 definition are summarised in figures 53 and 113 of **EBSC5**. For ease, the identified needs are also summarised in columns 2 and 3 of Table 10.1 in **EBSC2a**. The Council's approach delivers sites to accommodate the needs of both those who do and do not meet the PPTS 2015 definition.
104. With regard to delivery of pitches and plots in Hounslow between 2016 and 2025, the Council has undertaken a review of completions data for GTTS provision and can confirm that 10 (net) new Gypsy and Traveller pitches at the Hartlands Traveller Site, Church Road, Cranford, TW5 9RY (ref P/2015/1538) approved on 4<sup>th</sup> June 2015 were completed in monitoring year 2018/19, bringing the site's total number of pitches from 20 to 30. The 10 additional pitches are already taken account of in **EBSC5** as shown in Figure 119 and therefore their delivery does not contribute to meeting any of the needs identified in the study.
105. The Council's review of completions shows that no other GTTS pitches or plots were permitted in Hounslow between 2016 and 2025. This approach is reflected in the Hounslow Site Allocations and Capacity Assessment (SACA) - GTTS Addendum 2024 (**EBSC2a**), which does not apply a deduction to the identified GTTS need to take account of the delivery of pitches or plots in the borough. Overall, therefore, there is no evidence that some of the identified need in Figure 49 of **EBSC5** had already been met through delivery of additional pitches and plots between 2016 and 2025.

**Q4) Can the Council explain its approach relative to the accommodation requirements and unmet needs outside of the Borough but within the West London GTAA area? Is such an approach – justified, effective and in accordance with the PPTS and the Public Sector Equalities Duty?**

#### Q4) LBH Response:

106. Throughout the plan-making process the Council has undertaken ongoing engagement and cooperation with its duty to cooperate bodies as set out in the Duty to Cooperate Statement (**S10**<sup>28</sup>). The Council has also produced statements of common ground with all neighbouring plan making authorities covering cross boundary strategic matters including accommodation requirements and unmet needs. The Council confirms that no requests have been made from neighbouring authorities to help meet their unmet GTTS accommodation needs. The Council continues ongoing communication with its neighbouring authorities through various meetings both on a 1-1 basis and joint meetings with all parties in the West London Alliance area, statutory consultation at key plan making stages and electronic communication.

107. It should be noted that whilst the Council considers it is able to meet its 10-year targets for GTTS pitches and plots as required in the London Plan 2021 **ADP1**) identifying 0-5 year deliverable sites and 6-10 year developable sites as required by the PPTS (**EX1.26**<sup>29</sup>), it does not have sufficient sites to meet pitch and plot needs identified in **EBSC5** after year 10, up to the end of the Plan period (2041). As such, whilst no adjoining authorities or other authorities in the West London Alliance area have requested Hounslow assists with meeting any identified unmet needs within their areas, it would not be possible to in any event, given the Council's priority must be to meet its own needs. Furthermore, no authorities were identified as having capacity to deliver any of Hounslow's unmet needs on sites within their areas, with many neighbouring authorities experiencing challenges to the delivery of GTTS provision.

108. The Council considers its approach is in accordance with the PPTS, and in meeting the Public Sector Equality Duty has had due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. The Council's response to Matter 1 Qs 16 to 18 sets out how the Local Plan has addressed equalities. The Equality Impact

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<sup>28</sup> S10 - [Duty to Cooperate Statement](#)

<sup>29</sup> EX1.26 – [Planning Policy for Traveller Sites](#) (2024)

Assessment (2025) for the Plan (**ORD1**<sup>30</sup>) considers the impact of the Plan on GTTS communities in detail.

**Q5) Is the approach of the Plan justified in not allocating transit sites and emergency stopping places, given the evidence of previous unauthorised encampments in Hounslow?**

**Q5) LBH Response:**

109. Yes. The need for transit requirements across the study area is assessed in paragraphs 7.111 to 7.119 of **EBSC5**. In order to determine the potential need for transit provision **EBSC5** considers data from the MHCLG Traveller Caravan Count, the outcomes of stakeholder interviews and potential wider issues related to the Annex 1 definition of GTTS in the relevant PPTS at the time of the study's preparation (2015). **EBSC5** recommends that due to very low numbers of encampments, there is no need to provide any formal transit provision. A further recommendation of the study is to monitor the situation relating to levels of unauthorised encampments throughout the study area whilst any potential changes associated with PPTS (2015) develop. For example more households seeking to travel in order to demonstrate that they meet the planning definition. The PPTS has since been updated to expand the Annex 1 definition as explained in the Council's response to Q3 of Matter 3, Issue 3. The Council considers this recommendation is therefore no longer relevant.

**Q6) Does the Plan provide a positively prepared and effective approach to safeguarding of existing sites to support the needs of Gypsies, Travellers and Travelling Showpeople?**

**Q6) LBH Response:**

110. Yes. Part F of Policy H14 of the London Plan 2021 (**ADP1**) states boroughs should actively plan to protect existing GTTS or circus people pitch or plot capacity. Part B of

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<sup>30</sup> ORD1 - [Hounslow Local Plan 2020-2041 Equality Impact Assessment \(2025\)](#)

Policy SC9 of the Local Plan achieves this through “*Safeguarding and, where appropriate, expanding existing sites in the West of the Borough and supporting their enhancement*”. The Council considers the approach is positively prepared and justified, given there are current and future needs for GTTS accommodation in the borough, as identified in **EBSC5**. It is therefore important to provide a policy approach that avoids the loss of existing provision for the GTTS communities. Accordingly the approach in Policy SC9 seeks to safeguard and prevent loss of existing pitches and plots in the borough, as well as deliver GTTS sites providing new pitches and plots through associated site allocations (site refs 120 and 121), promote intensification and expansion of the existing Council owned Hartland Gypsy and Traveller site and provide a positively worded criteria based policy framework for relevant applications that come forward.

111. The borough’s GTTS sites are all located within the West of the Borough Opportunity Area, and it is therefore logical that Policy SC9 refers to safeguarding sites in this area. Notwithstanding this, to take account of the fact that there may be existing individual pitches or plots located outside of the West of the Borough, amongst other amendments, proposed modification **HLP\_C5\_07** in the Schedule of Suggested Modifications (**S11**) removes the specific reference to the West of the Borough in Part B of SC9 and instead refers to Safeguarding and supporting the enhancement of the borough’s existing Gypsy and Traveller and Travelling Showperson sites.

**Q7) If the Plan does not allocate sufficient sites to meet identified needs during the Plan period, would Policy SC9 provide a positively prepared approach in setting criteria for sites to come forward as windfalls, and is such an approach justified and/or consistent with the PPTS (particularly paragraphs 25 - 28)?**

**Q7) LBH Response:**

112. As explained in the Council’s response to Matter 3 Issue 3 Q1, the Council is able to meet its 10 year targets for pitches and plots as required in Part A of Policy SC14 of the London Plan (**ADP1**). The Council is however cognisant of the fact that the end of the Plan period is 2041, whilst the 10 year target would end in 2029/30, and therefore has put in a place a policy approach to the delivery of GTTS accommodation that would

apply throughout the duration of the Plan period. Accordingly, Part F of Policy SC9 of the Local Plan includes positively worded criteria to help support the delivery of additional provision on non-allocated sites, setting out clear criteria against which planning applications can be assessed. The Council considers this approach to be effective in securing GTTS provision, including in the latter stages of the Plan period, through its positively worded criteria.

113. The December 2024 version of the NPPF and accompanying updates to the NPPG together introduced grey belt, which is not a relevant consideration for this Plan, given it is being examined under the December 2023 version of the NPPF. However, for decision making purposes, the Council would note there is a possibility that proposals for non-allocated GTTS pitches or plots could come forward on greenfield sites and may therefore be considered against paragraphs 153-156 of the NPPF 2024.