



MATTER 1 EXAMINATION STATEMENT

CLAREMONT PLANNING (REP056) ON BEHALF OF EUROPEAN PROPERTY VENTURES (EPV) (FELTHAM)

10 December 2025

Our Ref: EPV016

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QUALITY MANAGEMENT

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1 MATTER 1 – LEGAL COMPLIANCE AND THE DUTY TO COOPERATE

Issue: Whether the preparation of the Plan has complied with the relevant procedural, legal, and other requirements.

19) Has the Council engaged constructively, actively, and on an ongoing basis with all relevant organisations on strategic matters of relevance, including in terms of housing, employment, and infrastructure provision, as required by the DtC and to maximise the effectiveness of the preparation of the Plan.

- 1.1. It is not considered that the Council has engaged constructively, actively, and on an ongoing basis with all relevant organisations on strategic matters of relevance, particularly in respect of housing provision in the borough. Claremont Planning's representations to the Regulation 19 Local Plan consultation identified concern with regards to how the proposed housing requirement set out at Policy SC1 of the emerging Local Plan (eLP) had been identified. These concerns were raised in respect of the eLP's reliance on the ten year housing target for Hounslow identified by Policy H1 of the adopted Local Plan in determining the housing requirement for the emerging Plan period through to 2041. As set out in Claremont Planning's representations to the Regulation 19 Local Plan, the eLP does not acknowledge or seek to respond to the significant undersupply in housing that has occurred across London since the London Plan was adopted in 2021. The level of undersupply was confirmed to be in excess of 60,000 dwellings by the 'London Plan Review Report of Expert Advisers'¹. The London Plan Review Report went on to identify that, to make good this backlog, the rate of delivery forthwith would need to be increased to in excess of 63,000 dwellings a year.
- 1.2. It is therefore apparent that a significant undersupply of housing has occurred across Greater London since the London Plan's adoption, that will not be addressed if each individual local planning authority within the Greater London area simply continues to plan for housing delivery based upon the housing targets for each authority identified by Policy H1 of the London Plan. In the context of this wider housing shortfall, it is considered that effective engagement with the other Greater London Local Planning Authorities should have been undertaken in order to ensure that a coordinated approach to addressing the housing supply shortfall against the London Plan housing requirement can be identified.
- 1.3. The eLP submission was accompanied by a Duty to Cooperate Compliance Statement that was prepared by the Council in June 2025. However, this evidence document demonstrates that engagement with adjacent authorities on strategic matters, such as housing need, was largely deferred to the Regulation 19 stage. This is not considered to represent the constructive, active, or ongoing engagement that is required by the Duty to Cooperate. Deferring meaningful engagement with adjacent authorities to the Regulation 19 stage is not considered to provide sufficient scope within the eLP review process for the outcome of any discussions on strategic matters to be effectively addressed by the Plan. Whilst it is acknowledged that the Council has published two completed Statements of Common Ground during the course of the Local Plan Examination, it remains that the Council's Duty to Cooperate Compliance Statement identified that a total of seven Statements of Common Ground were to be

¹ C.Katkoivski KC, J. Jamieson, P. Monaghan & W.Yang commissioned by the Secretary of State for Levelling Up, Housing, and Communities (January 2024) London Plan Review Report of Expert Advisers [Gov.UK]

prepared with adjacent authorities; the majority of which have not since materialised thus further evidencing the insufficient engagement that has been undertaken in support of the eLP. The DtC is not a matter that can be retrospectively addressed, such that in the absence of evidence to demonstrate how constructive, active, and ongoing engagement with adjacent authorities has been undertaken throughout the course of the eLP's preparation as required by the DtC, the eLP cannot be considered to be legally compliant and must be found unsound.

20) Are there any inter-relationships with other authorities in terms of housing markets, economic activity, travel to work areas and the market for employment land and premises, which have not been specifically addressed.

- 1.4. As set out in response to Question 19) above, and through previous representations, it is maintained that the eLP housing requirement has been determined solely by the housing target for the borough identified by Policy H1 of the adopted London Plan. As such, the eLP only addresses housing need as an isolated matter that is specific to Hounslow borough only. The approach taken by the eLP in this regard fails to acknowledge that the housing requirements apportioned to each authority by the London Plan, form part of a mechanism to achieve coordinated growth across the Greater London area. In this context, it is maintained that effective engagement with adjacent authorities in respect of housing markets and travel to work areas should have formed a key element of the work undertaken to inform the eLP in recognition of the joint working that is required to achieve the London Plan objectives. There is no evidence provided within the evidence base supporting the eLP to demonstrate that Hounslow's inter-relationships with adjacent authorities have been specifically addressed by the eLP.