

Examination of The Hounslow Local Plan 2020-2041
Matter 2 – Spatial Strategy and Strategic Policies

December 2025

Question 1 Does the Plan's vision and key objectives provide a positively prepared and justified approach for Hounslow's future growth?

The Plan's vision and key objectives reflect a positive intention to deliver sustainable growth, regeneration, and environmental improvements across the borough, aligning in broad terms with national and London Plan policy.

However, Berkeley considers that the approach could be strengthened by more explicitly recognising the scale of housing and employment need, particularly in the longer term. The objectives focus heavily on intensification within existing urban areas but provide limited strategic direction on how unmet or emerging needs will be addressed beyond capacity-based growth.

A more justified approach would include a clearer commitment to identifying strategic growth opportunities, including the potential for safeguarded land and Green Belt review, to ensure the Plan remains resilient and capable of delivering on its objectives throughout the full plan period.

Question 4 Is the spatial distribution of development across the Borough justified and what factors influenced the Spatial Strategy, for example, the approaches of the existing London Plan, physical and environmental constraints, effects on the highway network, the capacity of infrastructure to accommodate the proposed amount development?

The spatial distribution broadly reflects existing Opportunity Areas and infrastructure corridors but is heavily reliant upon urban brownfield intensification. Whilst a brownfield first approach is fully supported, Berkeley considers the strategy as submitted lacks ambition and flexibility to respond to longer-term housing needs. There is limited contingency for under-delivery or infrastructure delays. The absence of meaningful/selective Green Belt review and release strategy for future housing growth undermines the Plan's ability to meet need in full.

A more balanced approach, including some greenfield/Green Belt land, would provide long-term resilience and respond the local housing need figure based on the standard method for the post London Plan period (i.e. beyond 2029). Greenfield opportunities also have the potential to deliver alternative housing typologies and infrastructure-led development. By contrast, continued reliance on brownfield land - often affected by viability, remediation and infrastructure constraints - introduces delivery risk and may affect overall housing supply

Question 5 What alternative options for the spatial strategy were considered?

While the Plan sets out a spatial strategy based on intensification in town centres and designated Opportunity Areas, it is not clear that a full and reasonable range of spatial alternatives were actively considered - particularly options involving the sustainable release of Green Belt land to meet long-term housing and employment needs.

The strategy relies heavily on constrained urban capacity and existing designations, with limited flexibility to respond to higher growth scenarios or changes in delivery. In this context, Berkeley considers that options involving safeguarded land or strategic Green Belt release in sustainable locations should have been evaluated during plan-making. This would provide a more robust and justified approach capable of delivering growth across the full plan period and beyond, in line with national policy expectations.

Question 6 Why was the approach of the submitted Plan chosen and is it an appropriate strategy having regard to reasonable alternatives?

The submitted Plan prioritises intensification with existing urban areas and Opportunity Areas. However, whilst a brownfield first approach is rightly prioritised, reasonable alternatives – including limited Green Belt release to plan for further growth – appear to have been discounted early. This narrows the strategy's flexibility and limits its ability to respond to long-term needs, particularly given housing requirements and constrained delivery on small sites.

In addition, brownfield sites can often present viability challenges due to remediation, infrastructure and land assembly constraints. This may restrict their capacity to support meaningful levels of affordable housing. By contrast, greenfield and Green Belt opportunities can offer greater potential to deliver infrastructure-led, mixed-tenure communities that help meet identified affordable housing needs.

Question 22 Policy P2(b) relates specifically to Feltham within the West of Borough Area. Are the specific requirements of development proposals in those locations justified, effective, consistent with national policy and in general conformity with the London Plan 2021?

Yes - Policy P2(b) broadly aligns with the strategic objectives of the Local Plan and the London Plan 2021, recognising Feltham as a focus for regeneration, estate renewal and local centre enhancement. The requirements are generally justified and effective in principle.

However, Berkeley considers that there is further potential to support the long-term regeneration of Feltham through the strategic release of Green Belt land in sustainable locations. This would help deliver much-needed housing and infrastructure, provide flexibility in the spatial strategy, and safeguard land for future development to ensure the Plan remains resilient throughout its full period to 2041 and beyond.

As set out in previous representations, Berkeley has promoted an area of land off Bedfont Road in the Feltham which is suitable for release from the Green Belt and could deliver c . 1000 homes including affordable homes to help meet local housing need.