



MATTER 2 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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MATTER 2 – SPATIAL STRATEGY & STRATEGIC POLICIES

Issue: Whether the spatial strategy and strategic policies of the Plan are positively prepared, justified, effective, and consistent with national policy, and in general conformity with the London Plan, in relation to the scale and distribution of the development proposed.

- 1) *Does the Plan's vision and key objectives provide a positively prepared and justified approach for Hounslow's future growth?*
 - 1.1. It is not considered that the eLP's vision and key objectives provide a positively prepared and justified approach for future growth in the borough. Claremont Planning identified concerns regarding the eLP vision and objectives within the representations submitted to the Regulation 19 Local Plan consultation. These concerns were outlined in Sections 3.1.1 – 3.1.3 of the Regulation 19 Local Plan representations submitted on behalf of EPV by Claremont Planning, which established that the proposed eLP vision is overly verbose and accordingly lacks clarity and direction on how the Council proposes to achieve the objectives identified.
 - 1.2. As such, it is maintained that the eLP vision and objectives currently conflict with Paragraph 16 of the Framework whereby the proposed vision and objectives aspirational, but fails to provide sufficient direction to demonstrate that these are actually achievable. It is recommended that the eLP vision and objectives are refined, so that it is clear how these reflect and support the housing and economic growth strategy for the borough.
- 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 of development?*
 - 1.3. The spatial distribution of development across the borough is understood to have been principally informed by a sustainable development approach that embeds the Mayor of London's 'Good growth' agenda as set out in the London Plan. Section 2.5 of the eLP identifies that the spatial strategy seeks to direct growth to appropriate locations, with this informed by landscape, natural, and built heritage considerations as well as the need to support the uptake of sustainable and active travel. The principles that have informed the spatial strategy, and influencing factors are supported in principle.
 - 1.4. However, it is not considered that the Council have provided sufficient justification for the amendments made to the spatial strategy proposed by the eLP, following the withdrawal of the Volume 2, 3, and 4 Local Plans from Examination in 2023; specifically the removal of previously proposed Green Belt releases at Bedfont Lakes and Heathrow Gateway. The removal of all of the previously proposed Green Belt housing allocations by the Regulation 19 Plan represented a significant revision to the emerging spatial strategy and distribution of growth for which no justification or evidence has been provided by the Council. This was strongly objected to within Paragraph 4.1.7 of Claremont Planning's previous representations to the Regulation 19 Local Plan, given the documented housing shortfall that has arisen since the London Plan was adopted in 2021. In the absence of any justification or evidence to demonstrate why the release of Green Belt land in the borough for housing is no longer necessary, it cannot be considered that the spatial distribution of development proposed by the eLP has been sufficiently justified as required by Paragraph 35 of the Framework.

- 1.5. The spatial distribution of growth proposed by the eLP also seeks to concentrate growth within various opportunity areas identified by Policy SC1 of the eLP. Whilst the identification of opportunity areas for growth is not objected to in principle, Claremont Planning's previous Regulation 19 Local Plan representations (Section 4.1) identified concerns in regard to the evidence that has informed the capacity of the opportunity areas to accommodate the amount of development specified in Policies P1 and P2 of the eLP. These concerns were raised particularly in relation to the findings of the London Plan Review Report of Expert Advisers (2024) which criticised the reliance of London Authorities on identified 'capacity', highlighting that not all identified capacity translates into implementable permissions and delivery.
- 1.6. To ensure that the spatial distribution of growth can be demonstrated to be robustly justified, it is considered that specific site allocations should be identified by the eLP within each of the identified opportunity areas. This would provide certainty as to how each of the opportunity areas could come forward to deliver the number of dwellings envisaged. It is also considered that the previously proposed Green Belt housing allocations, alongside additional Green belt releases such as EPV (Feltham) site at Feltham should be identified to provide flexibility to housing supply in the event that allocated sites within the opportunity areas do not come forward for development.
- 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?*
- 1.7. Section 4.2.5 of Claremont Planning's previous representations to the Regulation 19 Local Plan identified concern in relation to the requirements of Policy P2(b) and consistency with the requirements of national planning policy. Policy P2(b) of the eLP requires new developments to plan positively to deliver the Council's vision for Feltham however, it is considered that the policy requirements lack clarity and direction as to how they are proposed to be applied. It is strongly advised that the proposed policy text is amended so as to identify clear and targeted policy measures and requirements that new development proposals are required to comply with in order to provide certainty for both developers and decision makers as to how development proposals will be responded to. These amendments are considered necessary to ensure that the eLP is consistent with Paragraph 16 of the Framework.