



Quod

R22 Local Plan

**Matter 2:
Spatial
Strategy and
Strategic
Policies**

**Hounslow
Local Plan**

St James Group Ltd

DECEMBER 2025

Matter 2: Spatial Strategy and Strategic Policies

- 1.1 On behalf of St James Group Ltd ('St James'), part of the Berkeley Group, Quod submits this hearing statement in respect of Matter 2: Spatial Strategy and Strategic Policies. This hearing statement responds to Matters Issues and Questions (MIQs) (IN03) issued by the Inspector on 24th November 2025. It is also cognisant of the Inspectors' initial questions (IN01 and IN02) and the Council's response to these under EX3 and EX4.
- 1.2 St James has entered a partnership with Sainsbury's to bring forward the redevelopment of the Sainsbury's Chiswick store and car park and are in pre-application discussions with the Council.
- 1.3 The Sainsbury's site represents the largest development site within Chiswick, the borough's second largest town centre, and is designated as emerging Site Allocation 107 to deliver a minimum of 300 homes and 5,300sqm of replacement retail floorspace. St James considers that the site has a greater housing capacity and has made submissions that the replacement floorspace is incorrectly reported.
- 1.4 Our client submitted representations at Regulation 18 ('R18') and 19 ('R19') stage and continues to be engaged at Regulation 22 stage (S1) (the 'Plan').
- 1.5 This hearing statement should be read in conjunction with the hearing statements submitted for Matters 1, 3, 4, 6, 7, and 8. The key points of which are summarised below.

Summary

- 1.6 The Plan is being prepared at an unprecedented time for London. The Government's¹ clear intention is to make rapid progress toward universal Local Plan coverage because they remain essential to facilitating the effective delivery of housing, jobs and infrastructure. However, to achieve this, the Government expects Inspectors to exercise a degree of flexibility to avoid seeing the adoption of poor-quality plans. We agree that flexibility is required here for the following reasons:
 - 1.6.1 The Plan is being heard against the previous Framework from 2023. It does not consider the Standard Method which proposes to increase housing from London Plan levels of 1,782dpa, to 2,052dpa to address affordability issues. Instead, the Council is proposing to reduce housing delivery over the plan period to an average 1,092dpa from 2030-2041. The Mayor has raised concern with this approach in the Statement of Common Ground between the Council and Mayor of London (EX5e), and we do not consider that this approach is positive.

¹ The Minister of State for Housing and Planning, Matthew Pennycook MP letter to the Planning Inspectorate, 9th October 2025

1.6.2 The Mayor of London and Government² are proposing emergency measures now to address '*the housing emergency, a national priority*'. The Government acknowledges '*That need is particularly acute in London. Housebuilding in the capital has faced significant challenges over recent years – including the impact of the Covid-19 pandemic, high interest rates, spiralling construction costs, regulatory blockers and wider economic conditions. As a result, more than a third of London boroughs recorded zero housebuilding starts in the first quarter of this year. The Government and the Mayor of London are determined to do what it takes to tackle London's housing crisis*'. This emergency is not recognised in the Plan, and the Whole Plan Viability Assessment (EBV1) (2024) is dated in this respect and does not demonstrate viability of the cumulative policies of the Plan, the threshold and promotes individual viability assessments at application stage to overcome this.

1.6.3 The borough has seen a sharp decline in its Housing Delivery Test results, dropping close to the 75% threshold. Only 668 homes were started in the borough in 2024/25, and 112 recorded to date (25/26). Once adopted the new London Plan housing figures will apply to the borough '*London has a stretching but realistic housebuilding target of 87,992 homes per year*'. These will supersede the Plan, and the remaining policies of the Plan will need to adapt to these new housing levels otherwise they will be out of date.

1.6.4 The Council is promoting the release of greenfield land to meet future development requirements. It proposes to de-designate Green Belt (38ha) and use existing open space for housing, industry and traveller accommodation. We do not consider that the Council has sufficiently optimised its accessible, brownfield town centre sites as part of this strategic decision. For example, throughout the preparation of the Plan, the indicative capacity of Site Allocation 107 (S1A) has been reduced by 20% from 390 to 300 homes with no justification provided within the Site Allocations and Capacity Assessment (EBSC2).

1.7 Therefore, crucial to the success of this Plan, is that it is prepared positively in a way that is aspirational but deliverable, contains clearly written and unambiguous policies, and avoids unnecessary duplication of policies (that appear in the Framework and London Plan)³. We consider that this can be achieved by the following:-

- 1.7.1 Recognition that there is a housing emergency.
- 1.7.2 Applying flexibility within policies to secure deliverability as the priority of the Plan. Policies which constrain delivery and viability should be revisited or revised.
- 1.7.3 Awarding equal weight to the affordable housing threshold approach and the viability tested route and the level of affordable housing arising from either approach.
- 1.7.4 Recognition that the Whole Plan Viability Assessment (EBV1) upon which policies of the Plan are based (1) does not demonstrate deliverability of the affordable threshold proposed for the majority of sites; (2) excludes abnormal costs which are incurred with

² London Plan Guidance Support for Housebuilding and Emergency Housing Package, November 2025

³ Framework, paragraph 16

the majority of brownfield site development; (3) advocates use of the viability tested route because of viability concerns; and (4) weight should be applied to viability assessments.

- 1.7.5 Incorporate the wording accepted by the local plan inspectors for Tower Hamlets Local Plan Policy D.SG5 wording to ensure site allocation deliverability *“For site allocations, the policies set out in this plan may be applied flexibly to ensure that the sites are viable and deliverable”*.
- 1.7.6 At 276 pages, it is not clear that this Plan has not duplicated policies throughout. Policy CC2 ‘Urban Design and Architecture’ for example is four pages long, comprising 34 limbs and 11 sub-limbs and refers to four other plans and SPDs. Policy CC3 ‘Tall Buildings’ is three pages long, and has 15 limbs, and 17 sub-limbs. Policy CC4 heritage is four pages, with 31 limbs and 6 sub-limbs. Any major development assessed against these 3 policies alone will need to consider 80 limbs and 34 sub-limbs, 114 policy requirements in total, in addition to the design policies in the London Plan and Framework. This does not suggest compliance with the Framework.

Executive Summary of Matter 2

- 1.8 The Plan does not appropriately identify all strategic policies, as key policies fundamental to delivering the borough’s housing targets (Policy CC3 – Tall Buildings and Policy SC4 – Scale and Density). The rationale for excluding site allocations as strategic but including Policy IMP2 (Delivering Site Allocations) is unclear.
- 1.9 The Plan is inconsistent with national policy as it does not provide a 15-year strategic timeframe from adoption, and the plan period should be amended to 2027–2042 in line with the PINS Pre-Examination Checklist and the Framework.
- 1.10 Despite being the borough’s second-largest settlement and its only Major Town Centre, Chiswick is only planned for “modest growth” (approximately 1.3% of the planned housing across the plan period) resulting in a spatial strategy that does not optimise development in sustainable locations.

Issue 1 - 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?

Q2: Does the Plan as submitted appropriately identify “strategic policies” or are the Council’s proposed modifications necessary for soundness?

- 1.11 In respect of whether a policy is strategic, the National Planning Policy Framework ('the Framework') is explicit that such policies *“should be limited to those necessary to address the*

strategic priorities of the area” and “should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies”⁴.

1.12 Strategic policies should be prepared to guide development for a minimum of 15 years and must be tested to demonstrate their *soundness* in full accordance with legal and procedural requirements set the Framework⁵.

1.13 The Council’s suggested Main Modifications (EX3) clarifies which policies it considers to be strategic, which are to be stated within Appendix 5 of the Plan.

1.14 Based on the above, we consider the following policies within the Plan should be strategic in accordance with the Framework⁶ and ‘Plan-making’ PPG as they are fundamental to the meeting the *“priorities for an area”*⁷ specifically the associated delivery of the Local Plan’s housing targets:

- Policy CC3 (Tall Buildings); and
- Policy SC4 (Scale and Density of New Housing Development)
- The Inspectors will need to be satisfied with the justification as to why the site allocations are not strategic, but the Delivering Site Allocations (IMP2) is.

Q3: Is the Plan consistent with the Framework which expects strategic policies to look ahead over a minimum 15-year period from adoption?

1.15 The Framework⁸ states that strategic policies should look ahead over a minimum 15-year period from the date of adoption to anticipate and respond to long-term requirements and opportunities. The submitted Hounslow Local Plan 2020–2041 (S1) sets a plan period starting in 2020 (5 years ago) ending in 2041 (i.e. 21 years), and its strategic policies are drafted on this basis. It still isn’t clear why the plan starts 5 years ago.

1.16 The minimum plan-period issue was raised by the Inspector of the Erewash Council’s Core Strategy⁹ resulting in the Council being obligated to extend its plan-period across to capture 15 years from its intended adoption.

1.17 PINS recently published its ‘Local Plans Pre-Examination Checklist’ in September 2025. The accompanying footnote 17 at Paragraph 3.2 (‘Plan Period’) confirms that *“it should be assumed that the plan will be adopted no earlier than one year after the date on which it is submitted for examination, and that the 15 year period starts on the 1st April following the date of adoption.”*¹⁰

1.18 Given that the Plan was submitted in June 2025, the earliest realistic adoption date would be from June 2026 onwards.

⁴ NPPF Paragraph 21

⁵ NPPF Paragraph 36

⁶ NPPF Paragraph 20

⁷ Plan-making PPG - Paragraph: 001 Reference ID: 61-001-20190315

⁸ NPPF Paragraph 22

⁹ PINS Examination of the Erewash Core Strategy Review – Post Hearings Letter (4th September 2024)

¹⁰ PINS - Pre-examination checklist for local plans prepared under the Planning and Compulsory Purchase Act 2004 - 23rd September 2025

1.19 In accordance with the PINS Pre-Examination Checklist this would have to be from 1st April 2027. Consequently, the effective plan period would operate from 2027 to 2042.

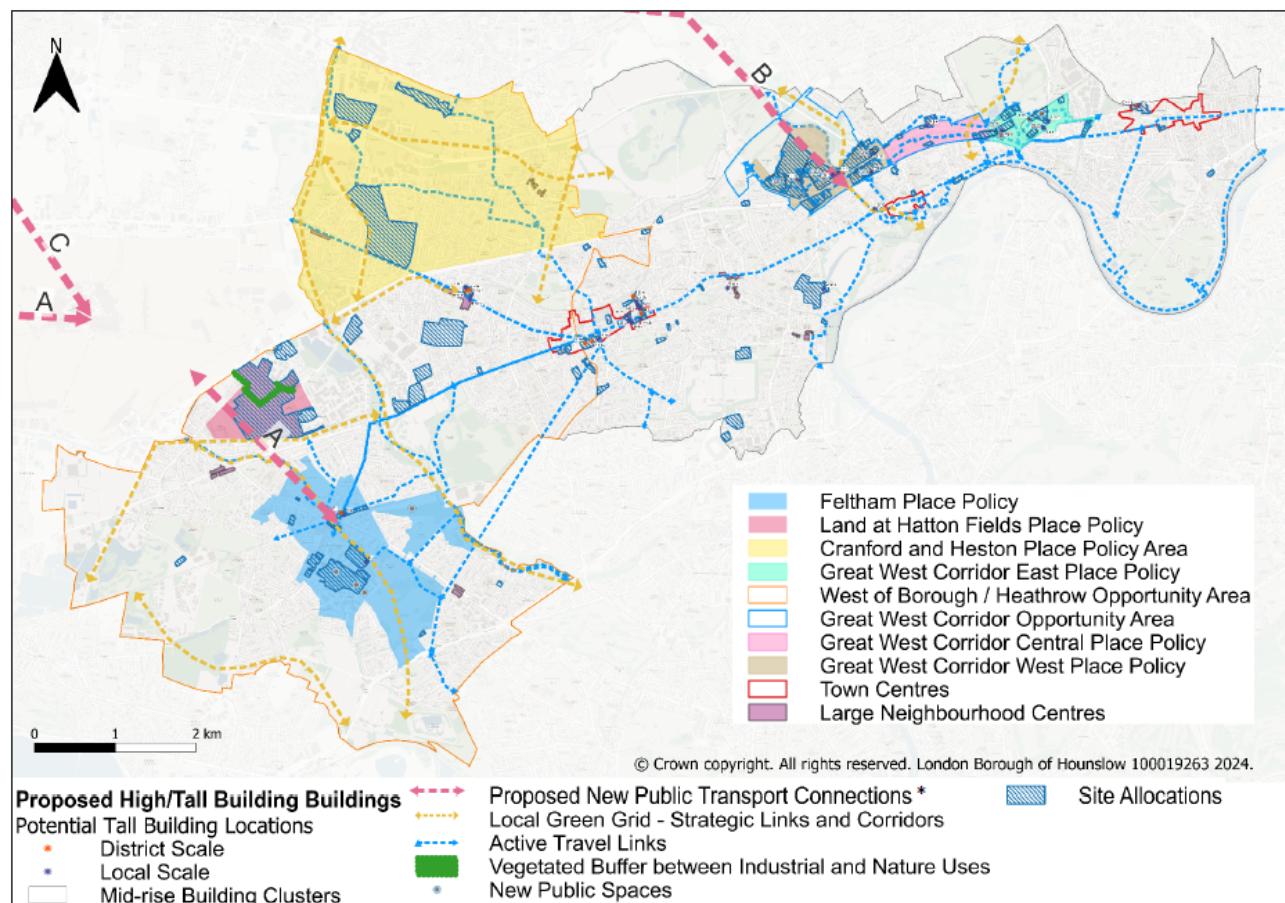
1.20 On this basis, the Plan period should be amended to '2027-2042' to address the 15-year minimum period required the Framework¹¹. This may require the Council to update its evidence base document to incorporate the period.

Q7: Are the Plan's strategic policies sufficiently clear about the overall amount of new housing and employment development envisaged in each of Hounslow's ten districts as identified in the Plan?

1.21 The Local Plan identifies ten districts across the Borough, which are informed by the study areas (B1–B10) defined within the adopted Characterisation and Growth Study (SPD1).

1.22 Figure SS1 ('Spatial Strategy for Ten Districts') does not appear to align with the spatially defined locations endorsed by SPD1, which define the Borough's ten largest settlements.

Figure 1 - Extract of Figure SS1 - R22 Local Plan (S1)



1.23 Only the extended geo-spatial districts for Cranford and Heston (Policy P2(a)) and Feltham (Policy P2(b)) are accompanied by dedicated spatial policies to guide how development should

¹¹ NPPF Paragraph 22

come forward in these locations. However, neither provide any detail regarding the scale or distribution of development expected in these areas.

- 1.24 The London Plan 2021 (LP2021) (Table A1.1: Town Centre Network) identifies Chiswick as the Borough's second-largest settlement and its only Major Town Centre, categorising it as suitable for 'medium' commercial and residential growth.
- 1.25 This places Chiswick on par with other Major Town Centres across London, such as Brixton and Fulham.
- 1.26 Despite this, the Plan categorises Chiswick as an area for only "*modest levels of growth*" over the Plan period, with new development expected to "*respect and respond to its established character in a sensitive, thoughtful, yet contemporary manner*"¹². The modest approach appears to have been informed by a design led assessment¹³, not one which considers wider spatial policies such as need, viability, accessibility, brownfield land, the Framework and London Plan. It appears a missed opportunity not to realise development capacity in one of the most sustainable locations in the borough.
- 1.27 The Plan provides no definition of what constitutes "*modest growth*" in quantitative terms, whether in relation to new homes, retail floorspace or other forms of development. Notably, the Plan only identifies three development site allocations (Sites 105, 106 and 107) across the entirety of Chiswick, despite its designation as a Major Centre¹⁴, its status as the second largest settlement in the Borough benefiting from "*a vibrant shopping and food and drink offering*"¹⁵ and high levels of public transport accessibility.
- 1.28 As identified at the Examination of the Erewash Core Strategy, Local Plan's must "*outline a spatial strategy that identifies the distribution of growth within the Borough along with an explanation of the reasons for this*"¹⁶. Specifically, where the hierarchy of the locations presented does not correlate with the quantum of development (or otherwise), explanation should be provided to clarify this position.
- 1.29 Collectively, the three site allocations are expected to deliver a minimum of 370 homes, 7,440 sqm of business floorspace and 5,300 sqm of retail floorspace. The Sainsbury's Chiswick site (Allocation 107)¹⁷ is anticipated to deliver the majority of Chiswick's overall housing growth.
- 1.30 This quantum of development represents only 1.3% of the total housing growth planned across the Borough. In this context, it is difficult to characterise Chiswick's contribution as "*modest*" in planning terms, the R22 appears to plan for far less.

¹² Page 36 – R22 Local Plan (S1)

¹³ SPD1, Design Code only tests Allocation 107 page 41

¹⁴ Table TC1.1 'The borough's network of town and neighbourhood centres' and Table A1.1 of the London Plan 2021

¹⁵ Paragraph 3.2

¹⁶ PINS Examination of the Erewash Core Strategy Review – Post Hearings Letter (4th September 2024)

¹⁷ A minimum of 300 homes and 5,300sqm of retail floorspace

- 1.31 Instead, the spatial strategy directs the overwhelming share of the Borough's future growth away from Chiswick and towards other areas which, in many instances, are less well served by existing services and facilities, employment opportunities and public transport provision.
- 1.32 While the aspiration for “*sensitive*” development in Chiswick is understood, it does not reflect the reality of delivering housing and other supporting uses in London’s constrained development environment and greater flexibility must be applied to support design-led density.