

Examination of The Hounslow Local Plan 2020-2041

Matter 3 – Meeting the Borough’s Housing Needs

December 2025

Question 1 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?

The Local Plan proposes to deliver approximately 28,040 homes between 2020 and 2041, equating to an average of 1,335 dwellings per annum. This falls significantly short of the Standard Method housing need figure of 2,039 (March 2025), which should now be applied following the expiry of the transitional arrangements in March 2025.

While the Plan aligns with the London plan 2021 target to 2028/29, that strategy becomes out of date in March 2026, and no updated London Plan is expected until late 2028 / early 2029. The longer-term capacity-led approach (1,000 dpa from 2029) fails to meet national policy requirements to plan proactively for housing needs in full. The strategy is not sufficiently flexible and risks under-delivery over the plan period. Additional allocations or safeguarded land should be identified to ensure a sound and resilient spatial strategy.

Question 2 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?

b). Is there any justification for departing from the London Plan 2021 housing requirements?

a). The Plan assumes a post-2028/29 housing requirement of 1,000 dwellings per annum, derived from a borough-wide capacity analysis (as set out in the London Plan). While this may reflect short-term physical constraints, it is a capacity-led figure, not an expression of need and results in a declining trajectory, not in line with national policy. Though technically aligned with the London Plan's ten-year target, this longer-term approach is not consistent with national policy requiring needs to be met in full.

b). Yes. While the Local Plan housing requirement is currently based on the London Plan 2021 target of 1,782 dwellings per annum, this figure will soon be out of date, because from March 2026, the London Plan will be more than five years old.

In that context, the Standard Method figure of 2,039 dpa represents the most up-to-date measure of local housing need. Although the Local Plan reached Regulation 19 prior to the 12 March 2025 transitional cut-off in paragraph 234 of the NPPF, and may therefore be examined under the previous Framework, it is important that the Plan remains resilient and responsive to rising housing needs - particularly in the latter part of the plan period.

Berkeley therefore considers that the Standard Method figure should be a material consideration, and that the Council should explore opportunities - including safeguarded land and strategic Green Belt release - to meet long-term needs.

Question 4 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?

The Plan sets out a trajectory to 2041 which seeks to meet the identified housing requirement. While the five-year supply has been accepted in appeal decisions from early 2024, that evidence may now be considered dated.

The trajectory beyond five years is largely dependent on strategic intensification and a significant number of small or constrained sites, which may present deliverability challenges over time.

The submitted version of the Plan does not appear to be accompanied by an updated five-year housing land supply position statement. To help ensure the Plan remains resilient over the plan period and to preserve its shelf life, it may be appropriate to consider identifying additional or safeguarded land – including the potential for strategic release of the Metropolitan Green Belt in sustainable locations – to provide flexibility should deliver assumptions change.