



MATTER 3 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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Date:	10 December 2025
Project Number/Doc Reference:	EPV016/ MATTER 3

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MATTER 3 – MEETING THE BOROUGH’S HOUSING NEEDS

Issue 1: Whether the Plan has been positively prepared and whether it is justified, effective, consistent with national policy and in general conformity with the London Plan in relation to meeting the Borough’s housing needs?

- 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?*
- 1.1. The overall housing requirement of 28,840 dwellings proposed by Policy SC1 of the eLP is not considered to be justified or consistent with national policy. The eLP has been prepared in the context of the adopted London Plan 2021, which apportioned a housing requirement to the borough of 17,820 dwellings for the period through to 2028/29, with future housing targets for the period 2028/29 to 2041 to be determined based on the 2017 SHLAA findings which underpinned the London Plan housing requirement.
- 1.2. The requirement for the eLP to be prepared in ‘general conformity’ with the adopted London Plan and the housing targets set therein is acknowledged by EPV (Feltham). However, it remains that the apportionment of housing need to the borough made by the adopted London Plan is not expressed as a maximum amount of development that should be planned for. The Council’s Housing Background Explanatory Note update (September 2025) however concentrates solely on the adopted London Plan housing target for the borough as providing the necessary justification for the housing requirement proposed by the eLP, and fails to afford any consideration as to whether the evidence which underpinned the London Plan housing targets can still be considered up-to-date. Paragraph 4.1.4 of Claremont Planning’s representations to the Regulation 19 Local Plan identified that the London Plan housing targets are based upon a Strategic Housing Market Assessment and a Strategic Housing Land Availability Assessment that were both prepared in 2017. Given the length of time that has passed since they were prepared, it is not considered that these documents represent appropriate or up-to-date evidence on which to base the housing requirement of the borough.
- 1.3. Notwithstanding the concerns raised in respect of the evidence base underpinning the London Plan housing target, it is also considered that there are further matters which should have been taken into consideration and addressed by the eLP housing requirement. For example, the significant disconnect that has arisen between the London Plan housing targets and the actual levels of housing delivery that have been realised. This was addressed within Paragraph 4.1.2 of Claremont Planning’s previous Regulation 19 Local Plan representations, with reference to the London Plan Review Report of Expert Advisers (2024) which identified that four years in to the ten year delivery period identified by the London Plan, a cumulative undersupply of 60,000 dwellings had arisen. On this basis, it is not considered that the proposed housing requirement can be demonstrated to be sufficiently justified by up-to-date and proportionate evidence and therefore is not considered to be consistent with Paragraph 35 of the Framework. To address this, it is recommended that the eLP housing requirement should be revisited, taking the London Plan housing requirement as the starting point and then making adjustments as necessary to ensure that previous under delivery and updated housing market evidence is taken into account accordingly.
- 1.4. It is notable that the Council’s Housing Background Explanatory Note Update (September 2025) identifies at Paragraph 2.20 that the Council had given consideration to planning to meet the standard method housing requirement for the borough of 3,368 dwellings (2023 Standard Method), however

discounting this growth option on grounds that this would result in the need to extend development into the established Green Belt, which the Explanatory Note considered to be 'unsuitable'. Arbitrarily restricting the eLP housing requirement so as to avoid the need to release land from the Green Belt is not considered to represent a positive or justified approach to determining the housing need that is to be met by the eLP, particularly when the previous Volumes 2, 3, and 4 Local Plan identified suitable development opportunities that could have been released from the Green Belt for housing. Whilst the site promoted by EPV (Feltham) at Feltham was not previously identified by the Local Plan for development, it remains that the promoted site represents a suitable and available site that could be released from the Green Belt to assist in meeting any uplifted housing requirement identified. Notably, the land located immediately to the south of the promoted site was granted planning permission at appeal in November 2024 (appeal reference: APP/Z3635/W/24/3342657) for an Integrated Retirement Community development. The approved development to the south means that the promoted site will be enclosed by development to all elevations, so representing a highly suitable candidate for release from the Green Belt in light of the site's limited contribution to the Green Belt purposes.

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 2019/20-2028/29:*

- 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?*

1.5. The Council's Housing Background Explanatory Note (September 2025) identifies that the SHLAA (2017) that was prepared in support of the London Plan provides the basis for determining the housing requirement for the remainder of the Plan period through to 2041. Paragraph 4.1.11 of the London Plan provides that if a target is needed beyond the 10 year period to 2018/29 then boroughs should draw on the 2017 SHLAA findings and any local evidence of identified capacity. The housing requirement for the later years of the Plan period has followed this approach so can be considered to be in general conformity with the London Plan.

1.6. As set out in the response to Question 1 above, it is considered that there is a basis for departing from the London Plan housing requirements, with these chiefly relating to the out of date nature of the evidence base which underpins the London Plan, and the documented challenges in realising the London Plan housing targets which have resulted in an undersupply of at least 60,000 dwellings across Greater London in the first four years following the London Plan's adoption. It is considered that the planning context in which the eLP is being prepared, is markedly different from that in which the London Plan was originally prepared. It is considered that the London Plan affords flexibility to local planning authorities to respond to such contextual changes, through the requirement for emerging Local Plans to be prepared in 'general conformity' with the London Plan. By using the London Plan requirements as the starting point for determining the housing requirement for the later years of the Plan period, but adjusting the requirement to respond to up to date evidence and contextual changes, such an approach would still ensure that the Local Plan was prepared in general conformity with the London Plan as well as providing a strategy that is capable of being found sound with regard to the tests for soundness established at Paragraph 35 of the Framework.

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 on 'specific deliverable sites', with 'specific development sites' also being a component of supply over the rest of the Plan period?*

1.7. It is not considered that the eLP approach is positively prepared in respect of housing supply. This was raised as a concern by Claremont Planning in Paragraph 4.2.2 in the previous representations to the Regulation 19 Local Plan. Whilst the eLP identifies that there is capacity within the Borough to meet the proposed housing requirement, Chapter 12 of the eLP only identifies site allocations to delivery 16,250 dwellings, so falling substantially short of the 28,840 dwelling housing requirement identified by Policy SC1 of the eLP. The Council has failed to clearly identify and provide evidence to demonstrate that sufficient sites will come forward, or will be achieved through existing commitments, to meet the eLP's housing requirement in full. As set out in Claremont Planning's previous representations, it is considered that the eLP places an undue reliance on windfall development in order to meet the emerging housing requirement. This cannot be considered to represent a positive approach to Plan making, particularly in the context of the removal of previously proposed Green Belt housing allocations in the Regulation 19 Local Plan which would have otherwise assisted in contributing towards housing supply in the borough.