



Quod

R22 Local Plan

**Matter 3:
Meeting the
Borough's
Housing Needs**

**Hounslow
Local Plan**

St James Group Ltd

DECEMBER 2025

Matter 3: Meeting the Borough's Housing Needs

- 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 3: Meeting the Borough's Housing Needs.
- 1.2 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 EX6.
- 1.3 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.
- 1.4 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.
- 1.5 Our client submitted representations at Regulation 18 ('R18') and 19 ('R19') stage and continues to be engaged at Regulation 22 stage (the 'Plan').
- 1.6 This hearing statement should be read in conjunction with the hearing statements submitted for Matters 1, 2, 4, 6, 7, and 8 the key points of which are summarised below:
- 1.7 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:
 - 1.7.1 This 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 the 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

1.7.2 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.

1.7.3 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.

1.7.4 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 (S1Aa) has been reduced by 20% from 390 to 300 homes with no justification provided within the Site Allocations and Capacity Assessment (EBSC2).

1.8 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:-

- 1.8.1 Recognition that there is a housing emergency.
- 1.8.2 Applying flexibility within policies to secure deliverability as the priority of the Plan. Policies which constrain delivery and viability should be revisited or revised.
- 1.8.3 Awarding equal weight to the affordable housing threshold approach and the viability tested route and the level of affordable housing arising from either approach.
- 1.8.4 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.

- 1.8.5 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”*.
- 1.8.6 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 3

- 1.9 The Plan intends to adopt a housing requirement that is already known to under-state the borough’s strategic housing needs and would result in a significant shortfall against this.
- 1.10 The Council’s stated 5YHLS position is incorrectly applied from 2024-29 rather than 2027-2032 and a number of sites within Appendix 2 of the Housing Background Explanatory Note (EX7) includes a number of sites that have already been completed or have lapsed permissions.
- 1.11 Policy SC2 is inconsistent with LP2021 Policy H5 because it fails to provide equal weight to the Viability Tested Route, despite the Council’s own viability evidence suggesting there is no clear level of affordable housing which most schemes can viably deliver.
- 1.12 Policy SC3 applies a rigid, needs-based housing mix without clear criteria or flexibility to respond to site characteristics, viability or LP2021 Policy H10 requirements
- 1.13 Policy SC4 should position the design-led approach as the overarching principle for determining site capacity and scale and avoid unnecessary duplication by deferring to design standards already secured through Building Regulations.
- 1.14 Policy SC5 should distinguish between different forms of development and reflect the practical limitations of bringing forward higher-density schemes which can deliver the Borough’s housing targets.

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?

Q1: 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?

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Q2: 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?

- 1.15 The National Planning Policy Framework ('the Framework') requires Local Plans to set out "a positive vision"⁴ and a clear framework for meeting identified housing needs.
- 1.16 The Framework further requires plans to be prepared in a manner that is "aspirational but deliverable"⁵. In this context, the Council's approach to establishing housing targets across the plan period is of critical importance, and at a minimum, Local Plans must be underpinned by robust, contemporary evidence of need, and must reflect the evolving national and London-wide policy context.
- 1.17 The Council's Housing Background Explanatory Note Update (September 2025) (EX7) sets the Plan's housing requirement at 28,040 dwellings across the plan period (2020–2041). This figure has been derived through use of the London Plan 2021 ('LP2021') target of 1,782 dwellings per annum (dpa) for the period 2020–2029, with the residual years (2030 onwards) informed by paragraph 4.1.11 of the LP2021⁶.
- 1.18 As shown within Figure 1 of EX7, this methodology results in the latter part of the plan period (2030–2041) averaging only 1,091dpa with output falling to as low as 369 homes in 2040/41. This would represent a substantial drop in delivery target when compared with current rates (1,782dpa), which we note the Council has not achieved since 2019/20⁷.
- 1.19 In setting housing targets beyond the LP2021 period, the Mayor of London has confirmed that paragraph 4.1.11 of the LP2021 is "now considered out of date"⁸ and should not be relied upon to inform post-2029 housing capacity.
- 1.20 The Mayor has made it clear in the Statement of Common Ground with Hounslow Council (EX5e) that the Plan should "roll forward" its current borough housing targets beyond 2029/30,

⁴ NPPF Paragraph 15

⁵ NPPF Paragraph 16

⁶ London SHLAA, 2017

⁷ MHCLG – housing supply net additional dwellings, England: Live Table 122

⁸ GLA representations to Camden R19 Local Plan, 12th June 2025

including any shortfall accrued to date, and to continue to take proactive measures to increase housing supply.

- 1.21 The justification for the Mayor's approach is that the current LP2021 housing targets were derived from a capacity basis rather than a needs basis⁹, and consequently, it under-provides for London's actual assessed housing need.
- 1.22 Indeed, the LP2021 housing targets (c.52,287dpa) were criticised within the LP2021 Examination Report (October 2019) with the Inspectors commenting that the plan failed to meet "*by some margin*"¹⁰ the identified annual need of 66,000 homes across London, and as a result of housing targets being so far below the assessed need, boroughs must "*use all the tools at their disposal*"¹¹ to ensure homes are built.
- 1.23 Since the adoption of the London Plan in 2021, London has consistently failed to meet its cumulative housing target averaging approximately 34,000¹² homes per annum to 2024/25 (65% of the minimum required). Not only has the LP2021 failed to meet the identified need of 66,000 homes, but it has failed to deliver its lower target by a significant margin also.
- 1.24 The housing emergency that London faces is set out in the recent emergency measures consultation proposed by the Mayor of London and Government.

London has a stretching but realistic housebuilding target of 87,992 homes per year. Net additional completions have ranged between 26-46,000, and housing starts between 13-23,000, for much of the past decade. However, overall homes started in 2024/25 totalled just 4,200 and in the first quarter of this year, more than a third of London boroughs recorded zero housing starts. While completions remain closer to earlier levels, this decline will filter through if current trends are allowed to continue¹³.

- 1.25 To remedy this, the next iteration of the London Plan will adopt the Government's Standard Method, increasing London's housing target to 88,000 homes per year. Hounslow's minimum housing need is identified as 2,052dpa.
- 1.26 In this context, a continued reliance on paragraph 4.1.11 of the LP2021 risks embedding a housing requirement that is already known to under-state the borough's (and London's) strategic housing needs and will imminently be replaced through the next London Plan, anticipated for adoption in 2027.
- 1.27 Without clear alignment to its assessed housing need, the Plan risks under-delivery and cannot be considered in accordance with the Framework¹⁴.

⁹ Letter from Secretary of State for Housing, Communities and Local Government to the Mayor of London - Intention to Publish version of the London Plan (dated 13th March 2025)

¹⁰ LP2021 Examination Report, Paragraph 175

¹¹ LP2021 Examination Report, Paragraph 178

¹² GLA London Datahub Residential completions dashboard (2021/22-2024/25)

¹³ Consultation on the proposed London Emergency Housing Package, page 9

¹⁴ NPPF Paragraph 61

1.28 Whilst we acknowledge that under the “*transitional arrangements*”¹⁵ of the Framework (December 2024), the Council may progress its Plan against the current LP2021 housing targets rather than the Standard Method, this transitional approach merely preserves the test against which the plan is examined. It does not grant authorities discretion to produce plans that are knowingly out-of-date or inconsistent with national policy.

1.29 This position is reinforced by the statement issued by the Minister of State for Housing and Planning - Rt Hon Matthew Pennycook MP to the Chief Executive of The Planning Inspectorate, which emphasises that the plan-led system must remain the cornerstone of the planning system and therefore the adoption of poor-quality must be avoided. The letter goes on to identify that Inspectors are encouraged to be pragmatic in allowing Local Plan to proceed to adoption, where “*the plan significantly boosts supply and still meets housing needs over the plan period*”¹⁶.

1.30 In this context, the Plan should, at a minimum, demonstrate how it will plan for the current LP2021 target of 1,782 dpa from 2030 onwards. In order to satisfy the requirement for plans to be “*aspirational but deliverable*”¹⁷, we consider that the Council should seek to future proof itself to account for the higher Standard Method figure of 2,052dpa, and to ensure alignment with national guidance and the Framework.

1.31 If the Council continues to rely on the 2017 SHLAA to plan for housing beyond 2029, this would a) be contrary to the Mayor’s direction on plan-making; and b) will result in a significant shortfall against the borough’s objectively assessed housing need; further exacerbating an already acute housing position, and the housing emergency.

Q3: Is the housing requirement/target identified correctly in Policy SC1 and on the Housing Trajectory in SC2.1? Why does it include a base year of 2020/21? Should it be modified to take account of any under-delivery in the 2019/20 year of the London Plan 2021 requirement?

1.32 Paragraph 4.14 of EX7 states that any deficit should be calculated from the base date of the adopted plan, which is set at 2019/20. This is consistent with the Planning Practice Guidance (‘PPG’) which states that the “*level of deficit or shortfall will need to be calculated from the base date of the adopted plan*”¹⁸.

1.33 As drafted, the plan period is set from 2020-2041. This does not align with the approach set out in EX7.

1.34 PPG also states that authorities must identify whether there has been any backlog or shortfall against the requirement and then address it within the plan period¹⁹. Consequently, any identified shortfall cannot be ignored or shifted simply by adjusting the trajectory start date.

¹⁵ NPPF Paragraph 234(d)

¹⁶ Letter to Paul Morrison (Chief Executive of the Planning Inspectorate) from Rt Hon Matthew Pennycook MP, 9th October 2025

¹⁷ NPPF Paragraph 16b

¹⁸ PPG (Housing Supply and Delivery) (Paragraph 022 Reference ID: 68-031-20190722)

¹⁹ PPG (Housing Supply and Delivery) (Paragraph 013 Reference ID: 68-023-20241212)

1.35 The housing trajectory in Policy SC2.1 should be modified so that the base year is reset to 2019/20 thus aligning with the LP2021 requirement period. On this matter, we note the Council's proposed modification to address its housing shortfall across 2019/20²⁰.

1.36 In respect of our response to Q4 below, when rebasing its Five-Year Housing Land Supply ('5YHLS') position to April 2027, the Council must also account for any shortfall in the intervening period from 2024.

Q4: 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?

1.37 The Council has calculated its 5YHLS for the period 2024–2029, which it justifies at Paragraph 4.12 of EX7 on the basis that this aligns with the most recent Housing Delivery Test (HDT) results. The Council's 5YHLS position has therefore been informed by its housing completions in the latest HDT monitoring years 2020-2023, and the Housing Flow Reconciliation data for 2023/24, and updates to its 'pipeline' of consented sites.

1.38 Whilst the Council has justified its approach referring to the most up to date information available at the time, it is ultimately inconsistent with the requirements of the Framework²¹ (December 2023), which expects Local Plans to demonstrate a supply of "specific, deliverable sites for five years following the intended date of adoption". The approach is already out of date.

1.39 PINS published on 23rd September 2025 its 'Local Plans Pre-Examination Checklist'. The accompanying footnote 17²² at Section 3.2 confirms that authorities should assume an adoption date no earlier than one year from submission.

1.40 As Hounslow submitted its Plan for examination in June 2025, the assumed earliest adoption date would therefore be June 2026. In this context, the relevant 5YHLS that the Plan should be assessed against would be from April 2027 to March 2032.

1.41 EX7 currently presents a 5YHLS that includes a historic supply from 2024 and 2025. This does not align with the Framework or PINS guidance and also has the potential to overstate the Council's housing land supply position give the assessment incorporates sites and completions anticipated in 2024/25 and 2025/26.

1.42 The Council's stated 5YHLS position is not aligned with national policy and cannot therefore be considered *sound*, as it is not informed by relevant or up to-date evidence as required by the Framework²³.

1.43 We consider that the robustness of the evidence base gives rise to further concerns when Figure 1 of EX7 is tested in further detail. This informs the Council's Projected Housing

²⁰ S11 HLP Table of Proposed Modifications - HLP_C5_01

²¹ NPPF (2023) Paragraph 69a

²² *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.*

²³ NPPF Paragraph 32

Trajectory & Housing Completions. We have asked the Council for the data sources behind the EX7 table but have not been provided with this information.

Figure 1 - Housing Trajectory - Projected Housing Completions 2020-2041 by Component (EX7)

Figure 1: Housing Trajectory - Projected Housing Completions 2020-2041 by Component

Housing Background Explanatory Note Update, September 2025



1.44 In addition to the Council's incorrect application of the 5YHLS period from 2024-2029 (rather than 2027-2032); the deliverability of sites within the phased pipeline (Appendix 2 of EX7) requires scrutiny by the Inspectors with several sites included either already completed or have lapsed permissions. Several schemes are anticipated for completion in 2024/25 or 2025/26 which would proceed the correct assessment window of 2027–2032.

1.45 Notwithstanding this, a number of sites relied upon either no longer benefit from planning permission or have been recorded inaccurately. A brief sample of these are set out in Table 1 below using data recorded by Molior.

Table 1 - Quod review of 5YHLS inputs

Scheme Name	Planning Permission	EX7 Housing Supply	Status
New Road Triangle	P/2021/1258	170	This scheme completed construction in Q4 2024.
Heathrow House	PAC/2021/2802	163	Construction is due to complete by Q4 2025.

Vista Business Centre (Block B)	PAC/2021/3092	71	Permission lapsed September 2024
Marlborough House	P/2020/1361	66	Construction is due to complete by Q4 2025
Vista Business Centre (Block A)	PAC/2021/3093	54	Permission lapsed September 2024
Chiswick Health Centre	P/2020/1176	52	Construction completed Q4 2024
The Wireless Factory	PALL/2021/4199	22	Permission lapsed December 2024
486 Bath Road	P/2019/3416	19	Permission lapsed June 2024 Section 73 application (Ref: P/2024/1888) to Condition 2 in order to implement a phased scheme was withdrawn.

1.46 This concern was raised at R19 Stage, where we identified that the Council's 5YHLS stated within their Site Allocation Capacity Assessment (SACA)(2024) (EBSC2) should be updated to remove several sites which were known to have lapsed. The Council have not made this adjustment, and from our review of EX7 Appendix 2 (Pipeline Sites) may have continued to overstate their housing supply pipeline.

1.47 With the correct five-year period of 2027–2032 applied, and when the Council's pipeline is cleansed of sites that have lapsed, or are inaccurately recorded, the recalculated supply figure would drop notably. Based on our review (which is not exhaustive), we identified that at least 1,730 (30%) of the 5,601 units identified in the pipeline may not contribute to the Council's 5YHLS.

1.48 Inspectors will need to be satisfied that all the site included in the Council's trajectory are "*deliverable*" against the relevant Framework definition²⁴ and PPG tests.²⁵

1.49 There is a strategic importance to this for Hounslow as we previously identified at R19 Stage²⁶. The majority of site allocations identified in the Plan (S1A) are proposed on complex, existing employment sites with many requiring the co-location of current employment / industrial uses,

²⁴ Annex 2 of NPPF

²⁵ PPG 'Housing Supply and Delivery': Paragraph: 007 Reference ID: 68-007-20190722)

²⁶ Table 1 of Appendix 1: R19 Housing and Industrial / Business Allocations of St James' R19 Representations (25th October 2024)

and where existing industrial floorspace cannot be re-provided or a plot ratio of 65%²⁷, whichever is the greater, will be subject to a 50% affordable housing threshold set by LP2021 Policy H5(B,3). These are challenging typologies which present viability issues when the cumulative cost of policy requirements is considered on the whole.

1.50 Appendix 1 of our R19 representations demonstrates that there are approximately 9,880 homes intrinsically linked to the delivery of c.90,000sqm of industrial floorspace and c.190,000sqm of office floorspace.

1.51 Quod on behalf of St James have requested the Council provided a detailed breakdown of its housing trajectory but this information has not been provided to date.

1.52 In absence of detailed, site-by-site breakdown of housing contribution per year, it is not possible to verify how many of the schemes within EX7 Appendix 2 (Pipeline Sites) will continue to contribute to the rebased 5YHLS from 2027. The same limitation applies to the site allocations shown in Figure 1 of EX7, where indicative phasing has not been provided by the Council.

1.53 Demonstration of a 5YHLS is a fundamental component of a *sound* Local Plan, as endorsed by the Framework²⁸. Failure to do so engages the “*presumption in favour of sustainable development*”²⁹ under the Framework.

1.54 The inability of the Council to demonstrate an appropriate supply of housing against a lower housing target than will be expected in the future under the Government’s Standard Method raises clear and substantial concerns for the Inspectors consideration.

1.55 To ensure compliance with national policy and sound plan-making principles we suggest that Hounslow should recalculate its 5YHLS using the correct period of 2027–2032 to accord with the Framework³⁰; make its assumptions available for public scrutiny; and revise its deliverable sites to remove reliance on historic performance, and ensure that all sites included within its trajectory are ‘*deliverable*’ in accordance with Framework definition³¹.

²⁷ London Plan 2021, Footnote 59

²⁸ NPPF Paragraph 72

²⁹ NPPF Paragraph 11(d)

³⁰ NPPF Paragraph 69a

³¹ Annex 2 of NPPF (2024)

Issue 2: Whether the Plan will be effective in delivering affordable housing to meet the needs of the Borough and an appropriate mix and standard of housing to meet the other housing needs of different groups in the community over the Plan period?

Q2: Policy SC2 of the Plan sets out the specific approach to affordable housing, in that regard:

a) Is the policy sufficiently clear and in general conformity with the strategic target and approaches in Policies H4 and H5 of the London Plan 2021?

1.56 Draft Policy SC2 is inconsistent with LP2021 H5 because it fails to refer to the Viability Tested Route and does not clearly articulate the equal status that the two routes should be afforded in determination of planning applications and the planning balance.

1.57 Part C of Policy SC2 hints at the policy route but is ambiguous "*proposals not following the Fast-Track Route*". This implies that it is a secondary or exceptional mechanism, which is inconsistent with the LP2021 which provides for both routes as legitimate and policy-compliant pathways.

1.58 Draft SC2 also fails to refer to the 35% Threshold set out in LP2021 H4 and H5, a clear omission.

1.59 The Fast-Track Route was introduced through the LP2021 to reduce protracted viability negotiations and incentivise developments to meet the fast-track thresholds (35% by habitable room), a level often beyond the maximum reasonable level of provision in pure viability terms. However, due to the housing crisis in London, the Mayor of London and the Government now propose to reduce this threshold to 20% as part of the emergency matters.

1.60 Further, the Whole Plan Viability Assessment (June 2024) (EBV1) which underpins Policy SC2 confirms that undertaking viability assessments is necessary because the WPVA does not point to any specific affordable level:

There are significant variations in the percentages of affordable housing that can be provided, depending on private sales values, scheme composition and benchmark land value. The results do not point to any particular level of affordable housing that most schemes can viably deliver and we therefore recommend that the emerging target is broadly deliverable over the plan period (recognising also that the policy incorporates the London Plan 'fast track' target of 35%), and applied on a 'maximum viable proportion' basis taking site-specific circumstances into account. This reflects the Council's current practice and also the approach in the 2021 London Plan.³²

1.61 To ensure clarity and consistency with the LP2021, the supporting text of Policy SC2 should explicitly reference the Viability Tested Route under Part F of Policy H5 of LP2021.

1.62 Supporting text should make clear that affordable housing delivered through the Viability Tested Route will be afforded equal weight as that delivered via the fast-track route. For example, "*Equal weight will be applied to the Threshold and Viability Tested Routes*".

³² EBV1 – Paragraph 1.7

1.63 Finally, the ‘Notes’³³ supporting text to Policy SC2 states that the “*Whole Plan Viability Assessment (2024) demonstrates that Policy SC2 together with the other policies in the Local Plan is financially viable*”. This statement is incorrect and directly contradicts the key findings under Paragraph 1.7 of the Whole Plan Viability Assessment (EBV1).

d) Is the proposed approach to affordable housing tenure splits justified, or should it include greater certainty and/or flexibility for individual site circumstances when having regard to the thresholds and tenure splits otherwise set out in Policies H5 and H6 of the London Plan 2021?

&

e) Is the approach to affordable housing supported by robust evidence to demonstrate financial viability, when having regard to other requirements in the Plan, and would the decision-making approach to viability be sufficiently clear?

1.64 The proposed 70% social/affordable rented and 30% intermediate tenure split promoted through Plan Policy SC2 broadly aligns with Policy H6 of the LP2021. Notwithstanding this broad consistency, it is essential that the Council’s preferred tenure mix is applied with appropriate policy flexibility.

1.65 The tenure split should comprise a “*borough wide guideline mix, subject to site-specific circumstances, including development viability, market conditions, and opportunities to maximise overall affordable housing output across the plan period*”. We recognise that paragraph 5.18 refers to flexibility but consider that the text should comprise part of the policy.

1.66 We also note that the national emergency emphasis on increasing the provision of housing endorsed through the GLA’s Support for Housebuilding LPG promotes a 60% Social Rent/40% Intermediate split, and post-dates the most recent revision to the Framework.

Q3: Is the approach in Policy SC3 in terms of housing mix; positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should address the following:

a) Whether the preferred housing mix in Table SC3.1 is based on up-to-date evidence, and whether there is sufficient flexibility in Policy SC3 to account for site specific circumstances and viability?

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b) Whether the circumstances where alternatives to the housing mix in the latest Borough Local Housing Needs Assessment may be accepted, are sufficiently clear to be effective?

1.67 The Framework³⁴ expects Local Plans to be informed by the area’s identified housing need including an appropriate mix of housing types for the local community.

1.68 At present, there is a tension within the plan. Hounslow proposes a ‘capacity-led housing supply’ under Policy SC1 yet applies a needs-based affordable housing policy at SC2 and a needs-based housing mix policy at Policy SC3. The tension arises because the overall housing

³³ Paragraph 5.20

³⁴ NPPF Paragraph 60

capacity for the borough is capped, yet the affordable tenure and mix is not. The policies therefore require flexibility to resolve this tension.

- 1.69 The Council's Local Housing Needs Assessment (2024) (EBSC3) informs the borough's target mix with the prescribed proportions set out in Table SC3.1.
- 1.70 Policy SC3(B) states that this mix will constitute the starting point for negotiations but fails to identify any assessment criteria that would guide decision-making when determining an alternative mix, and there is little flexibility applied in the supporting text. For example, it ignores LP2021 Policy H10(6) which identifies that sites within or adjacent to town centres and stations would expect a higher proportion of one and two bed units.
- 1.71 We consider that the policy should refer to the flexibility set out at paragraph 5.18 of the Plan "*The dwelling mix will be applied in the borough as a starting point for negotiation. It is acknowledged that deliverability will vary on a scheme-by-scheme basis depending on site characteristics, and viability that will be demonstrated in the Financial Viability Assessment*".
- 1.72 This is particularly important as the Council's Local Housing Needs Assessment (2024) (EBSC3) clearly states that the dwelling mix must not be applied rigidly, is indicative not prescriptive.

"1.44 The information from the LHNA should not be considered in isolation, but forms part of a wider evidence base to inform the development of housing and planning policies. The LHNA does not seek to determine rigid policy conclusions but instead provides a key component of the evidence base required to develop and support a sound policy framework."

- 1.73 Given the borough's constrained land supply, applying the dwelling mix in SC3 mechanistically, particularly the requirement for 61% of market homes to be 3-bed or larger will inevitably constrain housing output and hinder the borough's ability to meet its objectively assessed need, particularly given that the WPVA does not demonstrate that this mix is deliverable.
- 1.74 Accordingly, the policy should be redrafted to include the flexibility set out in LP2021 Policy H10(A)(1–9), which sets out a balanced suite of criteria for determining appropriate housing mix at the site level.

Q4: Policy SC4 relates to the scale and density of new housing development, is it positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should address:

- a) *If compliance with the design-led approach in London Plan Policy D3 should be a requirement of development proposals?*
- 1.75 It is not clear that this policy serves a sound purpose, it appears to simply replicate other development plan policies. LP2021 Policy D3 requires all development to "make the best use of land by following a design-led approach that optimises the capacity of sites". This is a fundamental principle to ensuring London can meet its development needs and make efficient use of its finite land supply. It is also consistent with the Framework, which expects Local Plans to include policies that "*optimise the use of land in their area and meet as much of the identified need for housing as possible*", and to "*seek a significant uplift in the average density of*

*residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate*³⁵.

- 1.76 Whilst we note that Policy SC4 refers to the design-led approach under limb (C), this is read within a wider context of Parts (A) and (B), which introduce multiple layers of additional design criteria. The cumulative effect of these considerations is to dilute, rather than support, the primacy of the design-led principles embedded in LP2021 Policies D3 and GG2(D).
- 1.77 If this policy is to be retained, to ensure consistency with the LP2021, the design-led approach should therefore be explicitly positioned as the overarching principle within Policy SC4, with other Local Plan design considerations applied in a manner that is clearly subservient when determining the optimum capacity of a site. This distinction is essential if Policy SC4 is to enable developments to optimise housing delivery in accordance with LP2021.
- 1.78 In respect of density and scale, Policy SC4 must also reference Part (B) of LP2021 Policy D3, which confirms that “higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling”. Inclusion of this wording is necessary to ensure Policy SC4 correctly reflects LP2021 policy requirements and guides decision-makers in identifying where higher density development is appropriate.
 - b) **Is it justified and consistent with other policies of the Plan to defer to design standards in Building Regulations? For effectiveness and consistency with national policy should it focus solely on the design standards otherwise set out in other policies of the development plan?**

1.79 Yes, the policy should not be replicating Building Regulations.

- 1.80 The Framework³⁶ states that Plans should avoid unnecessary duplication of policies that apply to a particular area, to this regard Building Regulations (Part O and F) now provide nationally consistent standards for managing overheating risk and ensuring adequate ventilation. The expectation that developments will adhere to the Building Regulations is already a legal requirement.
- 1.81 For effectiveness, the Local Plan should focus solely on design standards that are not addressed via existing building regulations or other Development Plan policies. This position is set out under Part E of Policy SC4.

³⁵ NPPF Paragraph 129(a)

³⁶ NPPF Paragraph 16b

Policy SC5 seeks to ensure suitable internal and external space. Is it positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should address:

b) Are the benchmark external space standards set out in Figure SC5.1 justified? If so, for effectiveness, should the detailed expectations be included in the policy wording?

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c) Would the implementation of the external space standards in Figure SC5.1 be compatible with the densities of development required to achieve efficient use of land on the proposed site allocations in the Plan?

1.82 We continue to have significant concerns regarding the benchmark standards in Figure SC5.1, particularly the requirement for flatted developments to provide a minimum of 25sqm of communal amenity space, offset only by private amenity provision, irrespective of tenure, typology, or site context.

1.83 While we acknowledge the flexibility introduced through limb B of Policy SC5.1, which allows external amenity space standards to be varied where justified by site-specific constraints, further clarity and flexibility is required.

1.84 In particular, the policy should distinguish between different forms of development and must reflect the practical limitations faced when bringing forward higher-density schemes, especially those located on urban or on otherwise constrained sites.

1.85 Such flexibility is essential if the Local Plan is to support higher-density development capable of delivering the Borough's housing targets. As currently drafted, the policy risks undermining the design-led principles and the optimisation of available sites required by the LP2021 and the Framework.³⁷

³⁷ NPPF Paragraph 129