

Hounslow Local Plan (2020-2041)

Examination

Stage 1 Hearings Notes

Housing

Approach to Neighbourhood Plan Areas

February 2026



**London Borough
of Hounslow**

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1.0 Introduction

1.1 This section of the Housing Note responds to a request from the Inspectors during the Matter 2 hearing (Spatial Strategy) of the Stage 1 Hounslow Local Plan 2020-2041 hearings, held on Wednesday 14th January 2026. The details of the task undertaken in this section of the Note are set out in *Documents Requested by Inspectors in Hearings Week 1 2026 (EX30)*¹ as follows:

- Explain the approach taken towards the designated Neighbourhood Areas within Hounslow, including why housing targets have not been set.

2.0 Policy Context

2.1 Paragraph 67 of the NPPF December 2023 version (ORD3)² states, *“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period...*

...Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.”

2.2 The Planning Practice Guidance (PPG) includes a section on how a housing requirement figure should be set for designated neighbourhood areas, which states, *“The National Planning Policy Framework expects most strategic policy-making authorities to set housing requirement figures for designated neighbourhood areas as part of their strategic policies. While there is no set method for doing this, the general policy making process already undertaken by local authorities can continue to be used to direct development requirements and balance needs and protections by taking into consideration relevant policies such as the spatial strategy, evidence such as the Housing and economic land availability assessment, and the characteristics of the neighbourhood area, including its population and role in providing services. In setting requirements for housing in designated neighbourhood areas, plan-making authorities should consider the areas or*

• ¹ EX30 – [Documents Requested by Inspectors in Hearings Week 1 \(2026\)](#)
• ² ORD3 [National Planning Policy Framework December 2023](#)

assets of particular importance, which may restrict the scale, type or distribution of development in a neighbourhood plan area” (Paragraph: 101 Reference ID: 41-101-20190509)³.

3.0 Approach taken towards the designated Neighbourhood Areas within Hounslow

3.1 In the Regulation 19 version of the Plan (**S1**)⁴, Chapter 2 – Spatial Strategy includes an approach to 10 defined geographic districts that comprise the borough. It does not include an approach specifically in relation to the borough’s three designated neighbourhood areas. In paragraph 11.5 of the Plan, the supporting text to Policy IMP3 – Implementing and Monitoring the Local Plan states,

“The Council will seek to support community led Neighbourhood Plans where these are being progressed. There are currently three designated neighbourhood areas within the borough: Butts Farm, Hounslow Town Centre and Osterley.”

3.2 In relation to setting a housing requirement for these neighbourhood areas, paragraph 14 of the Council’s Matter 2 Hearing Statement (**WS2.1**)⁵ in response to Question 8 of Matter 2 Issue 1 states,

“The neighbourhood areas in question were designated in 2013, 2016 and 2018 respectively. There has been no progress with neighbourhood plans for any of these areas and the neighbourhood forum designations are now expired.”

3.3 Whilst it is acknowledged that the NPPF expects housing requirements to be set for designated neighbourhood areas, at present, all of the relevant neighbourhood forum designations within Hounslow borough have expired, and no applications for re-designation have been submitted. There are therefore no qualifying bodies capable of preparing a neighbourhood plan nor are there any current indications that activity will pick up again.

3.4 If there were active neighbourhood forums for the designated areas, the Council would have engaged with these bodies in establishing a housing figure for those areas. However, at this point in time, due to the lack of groups that the Council can engage and consult with in respect of the designated neighbourhood areas, it would not be considered justified nor

³ [Planning Practice Guidance - Neighbourhood planning \(Paragraph: 101 Reference ID: 41-101-20190509\)](#)

⁴ [S1 Hounslow Local Plan 2020-2041 Proposed Submission Version](#)

⁵ [WS2.1 LB Hounslow Hearings Statement](#)

effective to establish a housing figure without the involvement of an appropriate qualifying body.

3.5 Should communities seek to re-establish a neighbourhood forum designation in the future, the Council will actively work with them to identify an appropriate indicative figure at that time, consistent with the NPPF and PPG.

3.6 This approach would also accord with paragraph 68 of the NPPF (2023), which allows for the local planning authority to provide an indicative housing figure to the neighbourhood planning body outside of the plan making process; it states that,
“This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.”

3.7 The Council considers that this approach is justified in the absence of any active neighbourhood forums in the borough, and should activity pick up during this Plan period, the Council can take account of the latest evidence in accordance with the NPPF and PPG.

3.8 It is also worth noting that many neighbourhood plans, particularly within urban areas, tend to focus on design, character and development quality, rather than allocating land for development. An example of where this approach has been accepted in a Local Plan is Dorset Council’s Purbeck Local Plan (adopted July 2024)⁶, which was prepared and examined against the requirements of the NPPF, December 2023 version (Document **ORD3**).

3.9 Policy H1 of the Purbeck Plan⁷ includes a table that identifies a housing requirement for designated neighbourhood areas where a made, or emerging, neighbourhood plan allocates land for new homes in support of the Council’s strategy for meeting Purbeck’s housing needs only. The table clearly explains where there is or is not an intention to prepare a neighbourhood plan, and in cases where there is a neighbourhood plan, whether that is or is not identifying a housing figure for the Neighbourhoods Area. An excerpt of this table in Policy H1 of the Purbeck Local Plan is shown in Figure 1 overleaf.

⁶ [Purbeck Local Plan \(2018-2034\)](#)

⁷ [Purbeck Local Plan \(2018-2034\)](#) Policy H1 - page 63

Figure 1: Excerpt from Purbeck Local Plan (2018 - 2034)

Across Purbeck, six neighbourhood plan areas have been designated. The table below identifies a housing requirement for designated neighbourhood areas where a made, or emerging, neighbourhood plan allocates land for new homes in support of the Council's strategy for meeting Purbeck's housing needs.

Designated Neighbourhood Areas	Housing requirement for neighbourhood area
Arne	Emerging neighbourhood plan does not seek to allocate housing sites, no specific housing requirement in accordance with the Council's housing strategy.
Bere Regis	Allocated housing sites in made neighbourhood plan for 122 new homes (the requirement identified in the neighbourhood plan has been updated to reflect the numbers of homes in extant planning permissions and new evidence on deliverability that has emerged after the plan was made).
Lytchett Matravers	Made neighbourhood plan does not seek to allocate any housing sites, no specific housing requirement in accordance with the Council's housing strategy beyond the number of homes allocated in this Plan
Wareham	Identified housing sites in emerging neighbourhood plan for 167 new homes (the requirement identified in the neighbourhood plan has been updated to reflect new evidence on deliverability that has emerged after the plan was made).
West Lulworth	Currently no intention to prepare neighbourhood plan, no specific housing requirement in accordance with the Council's housing strategy.
Wool	Emerging neighbourhood plan does not seek to allocate housing sites, no specific housing requirement in accordance with the Council's housing strategy beyond the number of homes allocated in this Plan.

4.0 Suggested Main Modifications to the Plan in Relation to Targets for the Borough's 10 Districts

4.1 It should be noted that the Council has proposed a series of suggested Main Modifications in the Matter 2 - Area Based Approach Note which sets minimum expected housing capacity figures for each of the borough's identified 10 districts in proposed Policies P2 to P10 of the Plan. The Council has also proposed a suggested Main Modification to insert a new table (Table SC1.1) in Policy SC1 which also includes the minimum expected housing capacity figure for each of the 10 districts in the Plan.

4.2 The Council considers that this is an effective and positive approach, which provides improved transparency regarding the proportion of housing development that is expected to

come forward in different parts of the borough over the remainder of the Plan period. To also provide three further figures in the Plan for housing within dormant neighbourhood areas, could risk over complexity, conflict and confusion within the Plan. Furthermore, as there are currently no active neighbourhood forums that the Council can engage and consult with in respect of the designated neighbourhood areas, there is not an opportunity to involve the appropriate qualifying bodies to achieve the necessary community buy-in required to accept the housing figures.

4.3 A further suggested Main Modification to the Plan is proposed in Chapter 1 – Introduction, to explain the role and scope of neighbourhood plans in the context of the Local Plan, and their relationship with the minimum expected housing capacity figures for the borough’s 10 districts. This suggested Main Modification is presented overleaf.

Modification code	Policy, Map/Figure	Paragraph/ Clause	Page	Modification	Reason for modification
To be determined in Document S11	Introduction	1.12	10	<p>Insert new paragraphs between 1.11 and 1.12 (that will be new paragraphs 1.12 and 1.13) as follows:</p> <p><u>NEIGHBOURHOOD PLANS</u></p> <p><u>1.12 Neighbourhood Plans are community-led plans that set out the detailed planning policies and proposals for their specific area. They must meet certain basic conditions and be in general conformity with the “strategic policies” in the Local Plan. The Local Plan includes strategic policies to guide sustainable development across the borough. Appendix 5 – Strategic Policies sets out which of the Plan’s policies are strategic.</u></p> <p><u>1.13 Table SC1.1 of Policy SC1 – Increasing Housing Supply, illustrates how the Council intends to deliver the scale and distribution of housing growth in the borough. Any neighbourhood plans that come forward may allocate additional growth to meet local needs at a scale which does not undermine the overall distribution strategy. They should seek to promote growth in the local areas identified and address local housing needs.</u></p>	<p>To include neighbourhood plans as part of the policy and context explained in Chapter 1 - Introduction of the Local Plan.</p> <p>To explain the relationship of neighbourhood plans with the Local Plan.</p> <p>To provide context for how any neighbourhood plans would relate to the minimum expected housing capacity figures for the borough’s 10 districts.</p>