

Hounslow Local Plan (2020-2041)

Examination

Stage 1 Hearings Note

**Five Year Housing Land Supply Position
Update**

March 2026



**London Borough
of Hounslow**

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1. **Five Year Housing Land Supply Update**

Introduction

- 1.1 This document sets out an assessment of Hounslow Council’s five-year housing land supply (5YHLS) position over the 2025 – 2030 period. The document accompanies the update to the Housing Trajectory requested from the Inspectors during the Matter 3 Hearing Session (Meeting the Borough’s Housing Needs) of the Stage 1 Hounslow Local Plan 2020-2041 hearings, held on Thursday 15th January 2026. Together, both the Housing Trajectory Update and this document form Task 6 as set out in *Documents Requested by Inspectors in Hearings Week 1 2026* (Document **EX30a**¹).

Policy Context

- 1.2 Paragraph 69 of the NPPF sets a requirement that, *“Planning policies should identify a supply of: a) specific, deliverable sites for five years following the intended date of adoption; and b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.”*
- 1.3 Appendix 2 of the NPPF provides the definition for a deliverable site:
- To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*
- 1.4 The NPPF published in December 2023 removed the requirement for a 5% buffer to ensure choice and competition in the market for land. The NPPF 2023 does however maintain the requirement for a 20% buffer in cases where there has been significant under delivery of housing over the previous three years (Paragraph 77), measured against the Housing Delivery Test.

¹ EX30a – [Documents Requested by Inspectors in Hearings Week 1 Update \(February 2026\)](#)

- 1.5 The NPPF also states that, where a plan-making authority cannot demonstrate a sufficient five-year supply (including any relevant buffer), the presumption in favour of sustainable development will apply, as set out in paragraph 11d and corresponding footnote 8. National planning practice guidance ('PPG') sets out that for the purposes of calculating the five-year housing land supply, housing completions should include all new build dwellings, conversions, changes of use, and redevelopments, which should be presented as a net figure to offset any demolitions.
- 1.6 This Five-Year Housing Land Supply Statement presents an overview of the five-year housing land supply position of LB Hounslow in accordance with the requirements of the NPPF and the guidance set out in national planning practice guidance. The five-year housing land supply position is assessed using planning status information that is base-dated at 1st April 2025. This means that site information in relation to planning permission status is considered as it was on 1st April 2025.

Calculating the Five Year Housing Land Supply

Housing Requirement

- 1.7 The national Planning Practice Guidance² advises that the housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5 year housing land supply figure where:
- the plan was adopted in the last 5 years, or
 - the strategic housing policies have been reviewed within the last 5 years and found not to need updating.
- 1.8 It states that in other circumstances the 5 year housing land supply will be measured against the area's local housing need calculated using the standard method. The PPG also advises that where there is more than one strategic housing requirement for an area (as is the case in London where housing supply targets are established through the London Plan), primacy is given to the most recently adopted policies for the purpose of this calculation.
- 1.9 The most recent adopted Local Plan which established a local housing requirement in Hounslow is the Hounslow Local Plan 2015-2030, which was adopted in September 2015. As the Local Plan 2015-2030 was adopted more than five years ago, it is no longer deemed

² [Planning Practice Guidance – Housing Supply and Delivery](#): Paragraph: 005 Reference ID: 68-005-20190722

current for the purpose of this exercise. In addition, the target contained in the Local Plan 2015-2030 has been superseded by those contained in the 2021 London Plan. Policy H1 of the London Plan establishes the housing requirement for Hounslow, setting a delivery target of 17,820 net additional homes to be delivered over a 10 year period (2019-2029), which annualised is 1,782 homes.

- 1.10 The current London Plan was adopted in March 2021 so at the time of this document’s publication has just reached 5 years since its adoption. The Hounslow Local Plan 2020-2041 was submitted in June 2025 and applies the borough’s housing target set out in the London Plan. In relation to the examination process, the PPG states,
- “In plan-making, the Inspector examining the plan will test the evidence to ensure that the 5 year housing land supply identified in strategic policies is sound. If it is not, wherever possible the Inspector will recommend main modifications to the plan to ensure that the plan identifies a 5 year housing land supply from its date of adoption.”³*
- 1.11 It is therefore clear from the PPG that the housing requirement figure in the strategic policies in the submission version of the Plan is what needs to be tested through the Examination process. Accordingly, the Plan’s annual requirement figure of 1,782 is used in this update to the five year housing land supply. The annualised housing requirement figure is multiplied by 5, to establish the overall base target for the next five years.
- 1.12 Although adopted in March 2021, the London Plan targets apply in part retrospectively as they are intended to be monitored from 1st April 2019.
- 1.13 The period that is measured in the five year housing land supply should follow on from the last reporting year from which completion figures have been confirmed. As such, a ‘starting year’ of 2025/26 has been used for the purpose of establishing this five year supply position, with a base date of 1st April 2025.

Shortfall/Surplus

- 1.14 In calculating the cumulative housing requirement figure for the next 5 years, alongside the baseline figure, it is also necessary to add any shortfall or backlog arising from previous under-delivery against targets in previous years covered by the relevant Plan (in this case, the London Plan). Following the ‘Sedgefield approach’ it is intended that the full extent of

³ [Planning Practice Guidance – Housing Supply and Delivery](#): Paragraph: 008 Reference ID: 68-008-20190722

any shortfall is carried forward and added to the established requirement for the next 5 years.

- 1.15 Any deficit is to be calculated from the base date of the adopted plan, i.e. the London Plan 2021, which is set at 2019/20. At the time of writing, completions data is available up to and including 2024/25, and therefore any shortfall is determined examining activity over 6 reported years. A total shortfall of 2,334 homes is therefore added to the 5YHLS requirement figure measured in this document.

Housing Completions 2019/20 to 2024/25

- 1.16 It is important to point out that there are some discrepancies in relation to the housing completion figures previously presented in the Five Year Housing Land Supply Position Update (January 2026 (Document EX12⁴), compared to the completion figures used in this updated document and accompanying update to the Housing Trajectory. The discrepancies are set out in Table 1 below.

Table 1 – Net Housing Completions by Monitoring Year

Monitoring Year	Target	Recorded Completions January 2026 Version EX12	Amended Recorded Completions March 2026	Updated Surplus/ Deficit of Completions Recorded in March 2026 against Target
2019-20	1,782	1,525	1,130	-652
2020-21	1,782	1,719	1,497	-285
2021-22	1,782	1,737	1,674	-108
2022-23	1,782	1,238	1,200	-582
2023-24	1,782	1,226	1,175	-607
2024-25	1,782	1,627	1,682	-100
Cumulative Total	10,692	9,072	8,358	-2,334

- 1.17 As demonstrated in Table 1 above, the revised total housing completions figure in Hounslow from 1st April 2019 to 31st March 2025 is 8,358 homes, rather than 9,702 homes as previously recorded in Document EX12. As a result, the total shortfall to be added to the 5YHLS requirement is 2,334 homes, rather than the shortfall of 1,620 homes that was previously applied in Document EX12.

⁴ EX12 – [Five Year Housing Land Supply Position Update \(January 2026\)](#)

1.18 The explanation for why this discrepancy occurred is set out in detail as follows.

- **The ‘point in time’ nature of the Housing Flow Reconciliation (HFR) data return.**
The HFR data is collected by Government each year (usually in September/October) to in turn inform the publication of the Housing Delivery Test (HDT) result for the preceding financial year. In London, borough planning authorities collect the raw HFR data (during the ‘starts and completions’ exercise) and transfer this to be collated and compiled by the GLA data team who complete the HFR return to Government on behalf of the boroughs. This can mean that mistakes can occur in the checking and transfer of data as boroughs are not fully in control of this process. There is a small window for data correction following publication of the HDT results for a given year. It is not always possible to correct the data within the time available, especially if problems are only spotted after this correction window has closed.
- **Known data quality issues with the Planning London Datahub (PLD).** The PLD is the GLA’s database of planning development data which ultimately informs the HFR return, and thereafter the HDT results, for London boroughs. The PLD system was introduced in Spring 2020, replacing the previous London Development Database (LDD) system. In the intervening years, a number of data issues have been discovered, including the duplication of housing unit data when transferring data from the Council to the GLA’s PLD system using so-called ‘extract spreadsheets’. This appears to have historically led to double counting in our HFR/HDT data, however, it was not possible to rectify with regards to the HFR/published HDT result. Issues related to residential unit data being deleted from many Hounslow records due to an ‘over-writing error’ which also historically affected our data, and this has taken a large amount of time to identify and rectify.
- **Changing data standards/practises.** The GLA also implemented a new range of data standards with the introduction of the PLD. This increased the burden upon monitoring officers as the range of data needing to be collected increased, along with new methods for data collection/transfer. The GLA also changed the PLD system to automatically count residential unit losses in the ‘commencement year’ rather than the ‘completion year’ as had been standard practise within the previous system. This led to temporary fluctuations in annual completions results which had not previously fed into annual returns.

- **Introduction of a new planning system for Hounslow.** The planning system used by Hounslow was updated in Spring 2024 from 'iPlan' to 'ASSURE' (both provided by NEC). This resulted in disruption and delay due to implementation difficulties, including the re-referencing of all records in the PLD to use the 'system reference' code as the old 'planning' or 'alternative' reference code which had been shared with the GLA was made obsolete in the new ASSURE system. This also led to instances of the 'over-writing' (deletion of unit/home level data) issue mentioned above as some records were mistakenly re-classified to different application types, deleting all unit data in the process.
- **Access to PLD data.** The Council has for a number of years not been able to access reports from the PLD system which would allow for the required residential completions (and approvals) data checking activity to take place. This has only recently started to be rectified with improvements to the GLAs' PLD 'PowerBI' reporting tool being made accessible to boroughs. This tool is still undergoing improvements to provide all the necessary reports and updates as this project was initially delayed by the TfL cyberattack in September 2024 due to the GLA's software being supported on TfL's affected servers. This issue led to difficulties in spotting instances of 'double-counting' – both in terms of the duplication of residential unit totals, and the mistaken recording of scheme completions in more than one reporting year.

1.19 In summary, the issues above are what led to the incorrect housing completion figures being recorded in **EX12** and previous evidence base and examination documents relating to the 5YHLS. However, to inform the completions referred to in this document and the accompanying update to the Housing Trajectory, the Council has undertaken a robust and extensive exercise of comparing all housing completion entries between HFR datasets and the PLD. This has enabled us to reconcile between the two datasets, ensuring that any erroneous data has been removed to the very best of our ability, and providing confidence in the completions data included in this most recent update.

Buffer

1.20 In certain cases it is necessary to add an appropriate buffer to the housing requirement including any shortfall for the five year period being measured, to help ensure that there is a reasonable prospect of achieving the planned level of housing supply. The requisite buffers and their application has continued to evolve between each iteration of the NPPF.

- 1.21 The NPPF 2023 does not include a requirement for a 5% buffer in any circumstances. The Hounslow Local Plan 2020-2041 is being examined under transitional arrangements meaning it will be assessed against the NPPF December 2023 and therefore no buffer is applied to the 5 year housing land supply calculation for the purposes of the Local Plan Examination.
- 1.22 The NPPF 2023 does however include the requirement for a 20% buffer in cases where there has been significant under delivery of housing over the previous three years (Paragraph 77), measured against the Housing Delivery Test. However, at the time this document was published the most recent Housing Delivery Test results (December 2024) confirmed that the Hounslow measurement is 108%. Consequently, the 20% buffer for significant previous under-delivery is not applicable to Hounslow and no buffer is applied.
- 1.23 The NPPF December 2024 version reintroduced the requirement for a 5% buffer. As such, in order to take a pragmatic approach, this document sets out two 5 year housing land supply scenarios:
- a. NPPF 2023 5YHLS calculation with no buffer applied
 - b. NPPF 2024 5YHLS calculation with the requisite 5% buffer applied

Supply

- 1.24 The supply side of the calculation essentially involves determining what supply, and associated level of capacity, is anticipated to be delivered over the 5 year period measured. This can be informed by a range of sources including amongst other things the latest pipeline data of planning permissions, and the estimated yield from allocations and windfall. The exercise needs to demonstrate there are sufficient specific deliverable sites in Hounslow to provide a minimum of five years' worth of housing when measured against the housing requirement.
- 1.25 For the purpose of this 5 year housing land supply update, the 5 year period covered is 2025/26 – 2029/30 (or 1st April 2025 until 31st March 2030). As such, the base date of this calculation is 1st April 2025. For future calculations this window of time will continue to be rolled forward to follow on from the last period of reporting on completions.

Components of Supply

- 1.26 To assist with calculating the five year housing land supply position, an updated version of the Housing Trajectory has been produced to accompany this document (see Spreadsheet **EX44g**). An excerpt of the Housing Trajectory is included in Figure 1 on page 20. This shows

the breakdown of anticipated completions on an annual basis over the life of the plan for Hounslow. The Trajectory includes existing commitments, deliverable and developable sites identified through the Site Assessment and Capacity work, and an element of windfall.

- 1.27 Whilst the Housing Trajectory covers the entire plan period of the Local Plan (2020-2041), as stated in paragraph 1.13, the five year housing land supply is required to look ahead over a period of 5 years following on from the latest recorded completions figure. As such, within the Housing Trajectory, the 5 year period covered is 2025/26 – 2029/30 (or 1st April 2025 until 31st March 2030). The specific components that comprise the five year housing land supply are summarised in Table 2 below.

Table 2 - Components of 5 Year Housing Land Supply:

Source of Supply	Contribution to Supply (no. of Homes)
Phased pipeline permissions	5,867
Unphased pipeline permissions	1,055
Site allocations: Great West Corridor	1,683
Site allocations: West of Borough	1,610
Site allocations: Rest of Borough	390
Council Owned Regeneration Sites	90
Windfall allowance/small sites	1,400
Brownfield Land Register small sites	184
Total	12,279

- 1.28 Table 3 overleaf provides a breakdown of how the five-year housing requirement and supply position has been calculated for the Local Plan 2020-2041, in accordance with the NPPF 2023.

Table 3: Five-year housing land supply position (calculated as per NPPF December 2023) – 1 April 2025 – 31 March 2030

Stage	Calculation	Category	Figure
A		Annual Housing Requirement	1,782
B	A x 5	(London) Plan Period Completions Required to date (2019/20 – 2024/25)	10,692
C		(London) Plan Period Completions delivered to date (2019/20 – 2024/25)	8,358
D	B - C	Accrued deficit (2019/20 – 2024/25)	2,334
E	D ÷ 5	Deficit annualised over 5 year period 1 April 2025 – 31 March 2030 (Sedgefield approach)	467
F	A + E	Annual housing requirement taking account of deficit	2,249
G	F x 5	Housing Requirement over 5 year period: 1 April 2025 – 31 March 2030	11,244
H		Housing Supply over 5 year period: 1 April 2025 – 31 March 2030	12,279
I	(H ÷ G) x 5	Five-year housing land supply	5.46

- 1.29 The borough's supply of deliverable sites for the five year period 1 April 2025 – 31 March 2030 is 12,279 homes. LB Hounslow is therefore able to demonstrate a five year housing land supply (5.46 years) against the Plan's housing target of 1,782 homes per year, with accrued deficit against the housing requirement from the base date of the London Plan (2019) added.
- 1.30 The borough's supply of 5.46 years' housing therefore also exceeds the four years' supply of housing that Hounslow is required to demonstrate, in accordance with the NPPF (2023), which would be against a requirement of 9,462 homes including deficit arising from previous under delivery.
- 1.31 If the five year housing land supply were being assessed in accordance with the NPPF 2024, after calculating the housing requirement over 5 years including previous under delivery against the requirement from the base date of the London Plan, it would then be necessary to apply a 5% buffer on top of this.
- 1.32 Table 4 overleaf provides a breakdown of how the five-year housing land supply position would be calculated in accordance with the NPPF 2024:

Table 4: Five-year housing land supply position (if it were calculated as per NPPF December 2024): 1 April 2025 – 31 March 2030

Stage	Calculation	Category	Figure
A		Annual Housing Requirement	1,782
B	A x 6	(London) Plan Period Completions Required to date (2019/20 – 2024/25)	10,692
C		(London) Plan Period Completions delivered to date (2019/20 – 2024/25)	8,358
D	B - C	Accrued deficit (2019/20 – 2024/25)	2,334
E	D ÷ 5	Deficit annualised over 5 year period 1 April 2025 – 31 March 2030 (Sedgefield approach)	467
F	A + E	Annual housing requirement taking account of deficit	2,249
G	F x 5	Housing Requirement over 5 year period: 1 April 2025 – 31 March 2030	11,244
H	G x 1.05	Plus 5% buffer	11,806
I		Housing Supply over 5 year period: 1 April 2025 – 31 March 2030	12,279
J	(I ÷ H) x 5	Five-year housing land supply	5.2

- 1.33 Having regard to the above calculation, if assessed against the requirements of the NPPF December 2024 LB Hounslow would be able to demonstrate a five year housing land supply (5.2 years) against the Plan's housing target.

2. **Housing Trajectory**

Introduction

2.1 This update to the Local Plan Housing Trajectory has been prepared as part of Task 6 as set out in Documents Requested by Inspectors in Hearings Week 1 2026 (Document **EX30a**). The updated Housing Trajectory also informs the update to the borough's five year housing land supply position set out in section 1 of this document. The Housing Trajectory update takes account of past completions compared against the London Plan derived housing target of 1,782 dwellings per annum from 1st April 2019 up to 31st March 2025. The Trajectory then projects forward from 1st April 2025.

2.2 To ensure the supply position is as up-to-date as possible, some of the Trajectory's other inputs have been updated. This includes:

- the pipeline of sites with consent at 1st April 2025;
- A Council owned regeneration site that is expected to be delivered in the next 5 years; and
- the phasing of some site allocations to account for the latest available information for the sites.

The same assumptions have been applied as were used in the update to the Trajectory in the Five Year Housing Land Supply Position Update January 2026 (**Document EX12⁵**) in relation to the following sources of supply:

- the small sites windfall allowance;
- the lapse rate applied to sites with permission not yet commenced; and
- the updated capacity inputs for the proposed site allocation at GlaxoSmithKline.

Period Covered

2.3 The updated Housing Trajectory covers the same period as the Local Plan 2020-2041, which expressed in monitoring years is 2020/21 to 2040/41.

2.4 To account for previous under delivery in 2019/20 against Hounslow's London Plan set housing target, an additional 652 homes have been added to Hounslow's housing target in year 1 of the Trajectory, meaning the borough's housing requirement used in the Trajectory

⁵ EX12 – [Five Year Housing Land Supply Position Update \(January 2026\)](#)

for the year 2020/21 is 2,434 rather than 1,782. The housing requirement then reverts to 1,782 in year 2 of the Trajectory (2021/22).

- 2.5 The period of the Trajectory between years 2020/21 and 2024/25 is informed by historical completion datasets. The 16 year period from 2025/26 to 2040/41 represents future years and is determined based on forecasting/projections.

Housing Target

- 2.6 The approach to setting Hounslow's housing target is explained in section 2 of the Housing Background Explanatory Note Update, September 2025 (**Document EX7**⁶). Within the updated Trajectory the target is shown both at an individual annual level and as a cumulative requirement.

Supply/Delivery Inputs

- 2.7 The principal input into the Housing Trajectory is the annual completions (actual or forecasted). Housing completions are expressed as a net figure (i.e. losses of existing units are subtracted from the gains).

Accounting for past delivery

- 2.8 The Trajectory records any deficit or surplus already accumulated since 2019/20, which aligns with the start of the London Plan informed housing target period. This involves establishing any difference in completion activity when measured against the Plan's target from the London Plan's base date (year 2019/20) to the year with the most recently available housing completions data (2024/25).

Future delivery

- 2.9 For 'future years', which for this iteration of the Trajectory covers the period from 2025/26 until 2040/41, annual delivery figures are estimated for each year. Future delivery capacity is broken down into separate components of delivery to avoid double counting of capacity. Each component is exclusive and is explained as follows:

Housing Completions 2020/21-2024/25

- 2.10 The net housing completions in Hounslow between 01/04/2020 and 31/03/2025 have been accounted for in the Housing Trajectory. These are based on the detailed site by site completions set out in the accompanying Housing Trajectory spreadsheet, which have been compiled using the Planning London Datahub, cross checking this information with

⁶ EX7 – [Housing Background Explanatory Note Update, September 2025](#)

the Housing Flows Reconciliation used to inform the government's Housing Delivery Test results. This process has been explained in detail in paragraphs 1.16 to 1.19 of this document. As such, the total number of completed homes from years 1 to 5 (2020/21 – 2024/25) of the Plan period is 7,228.

- 2.11 It should also be noted that to account for previous under delivery against Hounslow's London Plan set housing target in 2019/20, an additional 652 homes have been added on top of Hounslow's housing target in year 1 of the Trajectory.

Approved Planning Permissions in the Pipeline

- 2.12 The pipeline consists of all approved planning applications that are in the pipeline and not yet completed at 31/03/2025, after years 1 to 5 of the Trajectory. The pipeline has been updated and contributes 8,622 homes to the overall housing capacity accounted for in the revised Housing Trajectory. Where proposed site allocations have received planning approval, the net number of homes in the approved scheme have been counted towards the supply rather than the allocation figure, which avoids double counting and accounts for the most realistic assumption of supply available. The details of all sites included in the pipeline are set out in the accompanying Housing Trajectory spreadsheet.

Site Allocations

- 2.13 The collective capacity derived from site allocations in the emerging Local Plan 2020-2041 has been accounted for in the updated Housing Trajectory. The Trajectory includes a supply of 15,669 homes on site allocations. As explained above, this figure deducts any site allocations that have received planning approval, as these are accounted for in the pipeline figure.
- 2.14 It is important to note that overall, the Housing Trajectory is considered to be a conservative estimate of the Council's housing supply. This is because for the majority of site allocations, the minimum development quanta figures are used in the Trajectory, however, where consents have been granted on allocated sites, the number of homes granted in the consents have, in most cases, significantly exceeded their allocation figures. This trend is expected to continue, meaning on this basis future permissions on allocation sites would likely come forward with a greater number of homes than has been accounted for in the Trajectory.
- 2.15 Appendix 1 of this document - *Capacity on Allocations Compared with Equivalent Permissions*, includes a table comparing the minimum development quanta in proposed site allocations with the number of homes consented, where applicable. As demonstrated

in Appendix 1, a total of 12 separate proposed site allocations which have received planning permission have collectively come forward for +1,795 homes above their collective minimum development quanta figure during the Plan period so far.

Council-owned Regeneration Site

- 2.16 A mixed use regeneration scheme is proposed on Council owned land in Feltham that is expected to include 90 homes as part of a wider scheme to improve existing facilities and community provision.

Windfall Allowance

- 2.17 The approach to windfall in the SACA 2024 is derived from the Small Sites target in the London Plan 2021.
- 2.18 The small sites figure for Hounslow in the London Plan was originally set at 680 dpa. This was based on a modelled approach. The adopted version of the London Plan 2021 reduced this to 280 dpa.
- 2.19 This figure has also been used to inform the windfall allowance in the updated Housing Trajectory. In total, the Trajectory includes an allowance for 4,480 units to come forward through windfall from 2025/26-2040/41.

Brownfield Land Register

- 2.20 The updated Housing Trajectory includes small sites which are on the Brownfield Land Register with an identified capacity to deliver approximately 184 homes. This figure excludes sites that form part of the pipeline of permissions, in order to avoid double counting. Sites on the register are projected to be delivered within years 2025/2026 to 2029/2030 of the Plan period. Phasing of these is thus split equally over this period, at 36/37 units per annum.
- 2.21 The proposed Brownfield Land Register sites are considered to be closely related to the types of sites anticipated to come forward as part of the modelled approach adopted by the London Plan. Combined with the windfall allowance, the Brownfield Land Register sites give a total delivery of 4,664 homes over the plan period.

Lapse Rate

- 2.22 A lapse rate of 3% has been applied to consented sites in the pipeline that have not yet commenced, and is based on the trend lapse rate for permitted sites over the most recently monitored 10 year period for lapsed consents (2014-2023). A lapse rate is not

applied to sites with consent that are already under construction, given that such sites will have commenced within the period required, and as such cannot lapse.

2.23 Furthermore, the updated Housing Trajectory also does not apply a lapse rate to site allocations. As explained in paragraph 2.15 of this document, based on site allocations that have come forward during the Plan period to date, the number of homes permitted on the sites is overall, significantly above the minimum development quanta figures set out in the corresponding site allocations. As such it is not appropriate to apply a lapse rate to site allocations.

Overview of delivery inputs

2.24 The updated Housing Trajectory includes sites from all of the sources set out above and shows that a total of 36,273 homes will be delivered over the Plan period.

2.25 A full breakdown of housing supply figures accounted for in the updated Housing Trajectory, is set out in Table 5 below:

Table 5: Expected Delivery of Housing in Local Plan Housing Trajectory Update

Component of Supply	Capacity (Number of Homes)
Homes completed during monitoring years 2020-2021 and 2024-2025	7,228
Pipeline sites with planning approval	8,622
Site allocations	15,669
Council owned regeneration site	90
Other small sites on the Brownfield Land Register	184
Windfall allowance	4,480
TOTAL CAPACITY	36,273

Assigning capacity to future years

2.26 Having determined the capacity inputs, this capacity has been assigned to future years covered by the Trajectory, including the next 5 forecast years of the Plan period (the 5 year housing land supply), based on the anticipated timing of housing completions.

- 2.27 For the next five forecast years (2025/26 – 2029/30), only sites which qualify as ‘deliverable’ have been assigned to this period. The inputs here in relation to future delivery are identical to those informing the 5YHLS calculation, and a large proportion of the capacity derives from the pipeline of permissions established already. Site capacity assigned to years 2030/31 – 2040/41 of the Trajectory has been tested to meet the definition of ‘developable’ sites as defined in the NPPF as follows: *‘To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.’*
- 2.28 To help inform the phasing of sites, where available site specific information including phasing plans or information provided by developers has been taken account of, as well as discussions between site promoters and Development Management colleagues that are taking place through the application process. In most cases, this has been used to inform lead-in times for sites in the pipeline. Where such information is not available in relation to build out rates, phasing information has been broadly based on the Council’s own historic trends for build out rates, based on site size ranges.
- 2.29 Samples of sites in Hounslow that have been built out during the Plan period to date have been used to help inform averages for build out rates in the borough. The datasets used to inform these rates have been split into sites of 100-499 homes, based on a sample of 17 sites, and sites of 500 or more homes based on a sample of 4 sites. All 21 sites have been delivered during the Plan period, so are considered a reliable and up-to-date dataset.
- 2.30 As shown in Table 6 below, the average build out rate on sites of 100-499 homes in Hounslow is demonstrated to be 154 homes per year. Meanwhile, average build our rate on sites of 500 or more homes in Hounslow is 198 homes per year. These rates have broadly been applied in the Housing Trajectory for sites that are reflective of the site size thresholds considered in Table 6 below.

Table 6: LB Hounslow Build Out Rates Based on Large Sites Delivered Between 2019-2026

Site Size	Number of Sites Review to Inform Build-out Rate	Average Annual Build-Out Rate (no. of homes per year)
100-499	17	154
500+	4	198

- 2.31 For sites below the threshold considered in Table 6, as a starting point, phasing information has taken account of the build out rates in Lichfields Start to Finish 2024⁷. Where appropriate, some adjustments have been made to the application of these rates within the Trajectory to reflect a London context. This information has also been applied where planning applications have been submitted, but not yet determined.

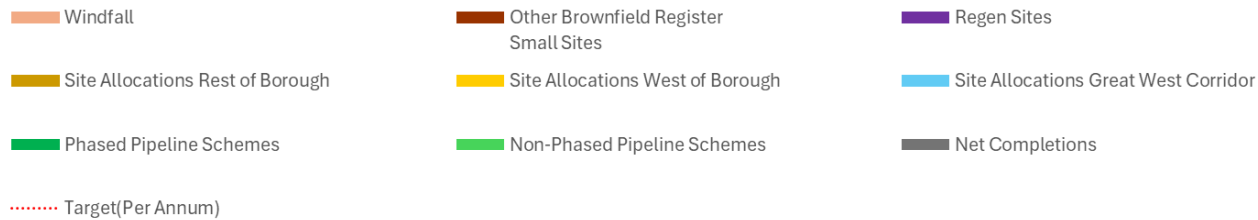
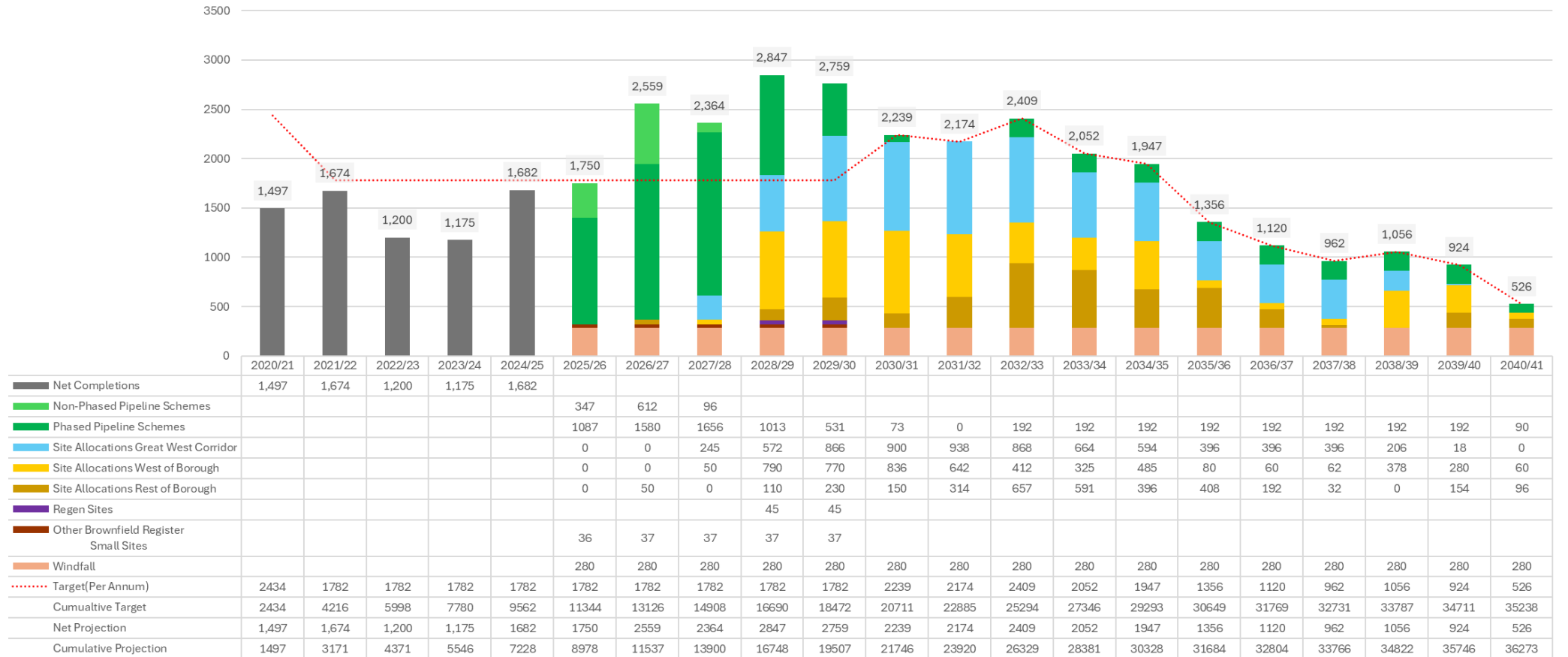
Findings of Trajectory

- 2.32 As set out in paragraph 1.29 of this document, for the five year period 2025/2026 to 2029/30 the borough anticipates a total of 12,279 completions, or an average of 2,456 per annum.
- 2.33 For the ten-year period 2025/2026 – 2034/35 the borough anticipates a total of 23,100 completions, or an average of 2,310 per annum. As such, the borough anticipates that it will exceed its housing target for the next ten years of the Plan period.
- 2.34 For the remainder of the plan period beyond the next 10 years, from years 2035/2036 to 2040/2041, the borough anticipates delivery of a further 5,944 homes, though it is expected this will, over the course of time, significantly increase through the identification of additional sites through future Strategic Housing Land Availability Assessment exercises. It should also be noted that the NPPF is clear that developable sites and broad locations for growth should be identified *where it is possible*⁸ for years 11-15 of the remaining Plan period.
- 2.35 The updated Housing Trajectory is illustrated on page 20 overleaf.

⁷ Start to Finish, Lichfields, 2024: https://lichfields.uk/media/w3wjmw0/start-to-finish-3_how-quickly-do-large-scale-housing-sites-deliver.pdf

⁸ LB Hounslow's emphasis added

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



Appendix 1: Capacity on Allocations Compared with Equivalent Permissions

Site Allocation no.	Site Allocation name	Planning Application Reference	Site Address	Postcode	Allocation Minimum Development Quanta (MDQ)	No. of Homes Permitted	Difference (homes permitted – allocation MDQ)
2	Tesco Osterley	P/2020/3100	Tesco Superstore, Syon Lane, Isleworth	TW7 5NZ	1030	1677	647
11	Homebase Syon Lane	P/2020/3099	Homebase Ltd, Syon Lane, Isleworth	TW7 5QE	370	473	103
30	Vantage West	PAC/2025/0360	Vantage West, Great West Road	TW8 9AG	130	178	48
34	Former Natwest Bank Site, Chiswick	P/2021/3510	Land at Chiswick Roundabout, Chiswick	W4 5QJ	120	252	132
35	B&Q Chiswick	P/2019/3954	2 Larch Drive	W4 5QL	270	386	116
82	206-210 Hanworth Road	P/2021/4144	209 Hanworth Road	TW3 3UA	80	124	44
84	Hounslow Cavalry Barracks	P/2021/0920	Hounslow Cavalry Barracks	TW4 6HD	1000	1525	525

Site Allocation no.	Site Allocation name	Planning Application Reference	Site Address	Postcode	Allocation Minimum Development Quanta (MDQ)	No. of Homes Permitted	Difference (homes permitted – allocation MDQ)
85	379 -389 Staines Road	P/2019/3935	379 Staines Road	TW4 5AX	20	64	44
97	30 Rugby Road	P/2019/3339	30 Rugby Road	TW1 1DG	60	146	86
110	Albany Riverside	P/2017/3372	40 and 40A, High Street	TW8 0DS	190	193	3
111	Brentford Police Station	P/2017/3371	Metropolitan Police Station, Half Acre	TW8 8DH	100	105	5
116	1 Burlington Lane	P/2024/2610	1 Burlington Lane	W4 2RR	90	132	42
Total					3,460	5,255	1,795

Nb. Prior approval has been granted for the conversion of office to residential use on allocation 29 - EMC Tower, Great West Road, TW8 9AN (planning ref PAC/2024/1307), however this is excluded from these calculations as the proposal only covers part of the site and it remains the intention that the proposed allocation will be delivered on the remaining areas of the site.

