



London Borough
of Hounslow

Hounslow's Local Plan

Authority Monitoring Report
2019/20

1. Introduction

The Authority Monitoring Report

- 1.1 Section 35 of the Planning and Compulsory Purchase Act 2004 required every local planning authority to produce an Annual Monitoring Report as part of their Local Development Framework (LDF) and submit it to the Secretary of State by 31 December every year. Section 113 of the Localism Act amended Section 35 of the 2004 Act and introduced changes that removed the requirement to submit the Annual Monitoring Report to the Secretary of State and renamed the document to be known as an Authority Monitoring Report (AMR).
- 1.2 The requirement for a local authority to produce an AMR is set out in Section 113 of the Localism Act 2011. The Act requires every authority to produce a series of reports containing information on the implementation of the Local Development Scheme, the progress and effectiveness of the Local Plan and the extent to which the planning policies set out in the Local Plan documents are being achieved.
- 1.3 Local Authorities now have greater flexibility on how they wish to monitor development, with the exception of a continuing requirement on housing (including affordable housing). The AMR must contain information regarding the annual number of net additional dwellings planned in any part of the local planning authority's area, the relevant number completed in the AMR year, and in the years since the policy was first published, adopted or approved.
- 1.4 Following the changes to monitoring requirements set out by the legislation this AMR will present the Council's Housing trajectory and continue to monitor the monitoring indicators set out in the 2015 Local Plan for the period 1 April 2019 to 31 March 2020.

Local Development Scheme

- 1.5 The Council's Local Plan was adopted on 15th September 2015 following public examination and updated in 2019 and 2020. The Local Plan includes strategic policies, development management policies and site allocations. In the Local Plan the Council committed to undertake a partial Local Plan Review for the Great West Corridor and the West of Borough growth areas.

Local Plan Reviews

- 1.6 The Council has recently gained approval to submit the draft submission Local Plan Reviews volumes 1,2 and 3, will submit these to the planning inspectorate in mid-December 2020. Independent examination in public is anticipated to take place in early 2021. Following receipt of the Inspectors report, the Local Plan Reviews are expected to be adopted in mid/late 2021.

2. Housing

Housing Supply

- 2.1 A revised National Planning Policy Framework (NPPF) was published in February 2019. Paragraph 67 requires that Local Planning Authorities (LPAs) to identify a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an appropriate buffer. The buffer requirement is set out at paragraph 73. This requires an additional 5% buffer should be demonstrated to ensure choice and competition in the market, 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan or 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply. The 20% requirement will be measured using the Housing delivery test from November 2018 onwards.
- 2.2 The Housing Delivery Test 2019 measurement indicated that Hounslow achieved 104% which means that Hounslow no longer required to add a 20% buffer to its trajectory and instead falls back to 5%. This is reflected in table 2-1.
- 2.3 *The glossary of the NPPF sets out that:*

“To be considered deliverable, sites 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. In particular:

a) sites which do not involve major development and have planning permission, and all 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 (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

Therefore, the housing land supply will consider all sites with planning permission as deliverable, within five years, except where information indicates that, on major sites, delivery may extend into the second phase. In addition, a stepped discount will be applied, based on the historic lapse rate in planning permissions and taking account of the current significant slowdown in building:

- 6% for years 0-5
- 5% for years 6-10
- 4% for years 11-15

This is based upon a historic lapse rate of 4% over the last 10 years in Hounslow (See Table 2-1, overleaf), which is then multiplied to account for the anticipated increased rates resulting from the present COVID-19 pandemic.

Table 2-1: Lapse Rates		
Units permitted FY2009/10 - FY2018/19		
Development Status	Units	%
Completed	6346	51.6%
Lapsed	497	4.0%
Started	3384	27.5%
Submitted	2080	16.9%

- 2.4 Since the London Plan (2011) the Mayor's office published updated housing targets for boroughs set in the Further Alterations to the London Plan (FALP) in March 2015, subsequently incorporated in the London Plan 2016. The London Plan 2016 sets the council a substantially increased minimum annual housing delivery target of 822 units up from 470 units in the previous London Plan. This equates to a minimum housing delivery target of 8,220 units for the next 10 years. This has been used in the housing trajectory in this report, from 2015/16 onwards. In accordance with the NPPF and London Plan, Table 2-2 below highlights the minimum housing numbers to be delivered over the 15 year Plan (Local Plan) period.

Table 2-2: Housing Requirement			
Phase	London Plan Target (822 units per year)	NPPF 5% buffer in Phase 1	Total
Phase 1 (Years 1 to 5)	4,110	206	4316
Phase 2 (Year 6 to 10)	4,110	-	4,111
Phase 3 (Year 11 to 15)	4,110	-	4,111
Total	12,330	206	12,536

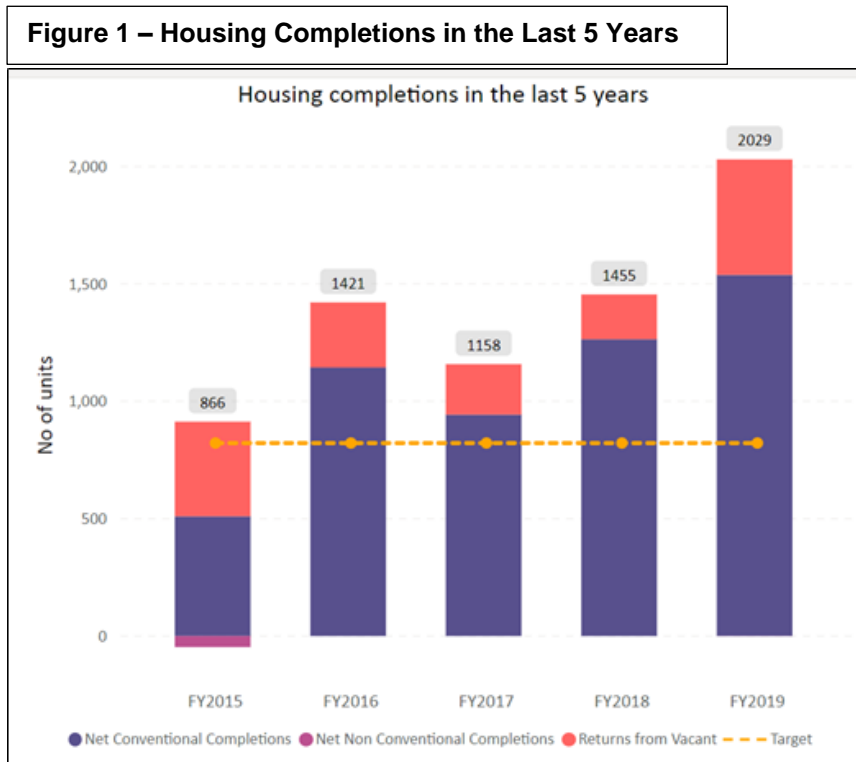
- 2.5 The recently published Intend to Publish London Plan (2019) sets a significantly increased housing target of 17,820 units between 2019/20 and 2029/30, or 1,782 units per annum. If adopted in this form, and extended over the plan period, it would significantly increase the 15 year housing target to 26,730 units.
- 2.6 To respond to these proposed targets, the council has undertaken a Site Allocations and Capacity Assessment (SACA)(2020), utilising the HELAA methodology to find suitable developable and deliverable sites. However, as the London plan is not presently adopted, the housing targets are assumed to continue at their present level for the purposes of this AMR document.
- 2.7 Drawing on the Greater London Authority's (GLA) Strategic Housing Land Availability Assessment (SHLAA) 2018, Local Information and the draft site allocations, the Council have identified specific deliverable sites for the first five years of the trajectory, specific developable sites for years 6-10 and broad locations for future growth for years 11-15. Alongside the housing capacity figures identified in the SHLAA 2013 and Local Plan, information on actual and estimated completions are provided by the Council's housing and development management departments, and by developers in some instances, and recorded on the London Development Database (LDD).

Overall Delivery in the Last Five Years

2.8 The London Plan Target takes three components into account when considering net units delivered. These are:

- Net Conventional Completions: self-contained residential units resulting from new build and conversion, including demolished units.¹
- Non-conventional Completions: non self-contained residential units, such as Houses in Multiple Occupation (HMOs) Student Accommodation, and Nursing Homes.¹
- Long Term Vacant Units returning to use.²

2.9 The cumulative target for the last five years was 4110 homes.



FY	Net Conventional Completions	Net Non Conventional Completions	Returns from Vacant	Total Delivery	Target	% Target	Cumulative Target	Cumulative Delivery
FY2015	510	-47	403	866	822	105%	822	866
FY2016	1144	0	277	1421	822	173%	1644	2287
FY2017	943	0	215	1158	822	141%	2466	3445
FY2018	1264	0	191	1455	822	177%	3288	4900
FY2019	1538	-1	492	2029	822	247%	4110	6929
Total	5399	-48	1578	6929	4110	169%	4110	6929

¹ Source: London Development Database

² Source: ONS Table 615 Vacant dwellings by local authority district: England, from 2004

- 2.10 Total delivery in FY2019/20 was 2,029 units or 247% of the target.
- 2.11 As shown above, in Table 2-3, Hounslow has delivered a total of 6,929 Units over the last 5 years, or 169% of the cumulative target.

Housing Trajectory Methodology

- 2.12 The Housing Trajectory sets out the Council's anticipated delivery rates for housing over the next 15 years, with a particular focus on the first five, in what is known as the five year housing land supply, in accordance with the NPPF.
- 2.13 The trajectory considers three principle sources of supply:
- Sites with Planning Permission for Residential Units, taken from data entered in our Monitoring System as permissions are granted. This includes Full, Outline and other types of permission.
 - Sites Allocated for development in the existing Local Plan or Draft Local Plan Reviews
 - Windfall delivery on sites not identified by the council.

Sites with Planning Permission

- 2.14 The Trajectory considers all sites with planning permission as deliverable, within five years, except where information indicates that, on major sites, delivery may extend into the second phase.
- 2.15 Projecting expected delivery of development has been an area of interest in terms of boosting housing delivery. Analysis by Nathaniel Lichfield Planning in their report Start to Finish³ looked into the speed at which certain site sizes deliver by assessing the average number of homes a year for a large number of sites across England. The research indicates that for sites of between 0-99 new build units, an average delivery of between 20–40 units is delivered each year with an average of 22, 100-499 units deliver a much wider range of between 25-150 units per annum with an average of 55 units and 500-999 units deliver between 20-140 units with an average of 68 units. This provides an indicator which allows for the projection of development on sites by modelling them on the trend for similar types of site. Hounslow's permission pipeline by count of applications is dominated by small schemes, but in terms of units proposed, a small number of major schemes make up the majority. Therefore the projection of units is based on a division between large (11+ Units) and small sites (1-11). Sites of 11 or more units are anticipated to deliver an average of 50 homes per year, while sites of less than this are anticipated to deliver 20 homes per annum.
- 2.16 The council has conducted detailed work with the developers of major sites in the borough to gain a detailed understanding of the anticipated timelines for development, so these sites are based on information received from owners and developers. This reflects the site specific differences which can cause sites to

³ https://lichfields.uk/media/5779/start-to-finish_what-factors-affect-the-build-out-rates-of-large-scale-housing-sites.pdf

deliver more quickly or slowly. A large range of deliver speeds was indicated in the *Start to Finish Report* with the fastest, greenfield sites delivering more than 300 units per annum.

2.17 Hounslow has received a large number of prior approvals which enable the conversion of vacant offices (B1a) into residential units (C3). These developments by their nature are conversions of large office blocks, and do not behave like similarly large and high density new-build development but can result in a large number of units being delivered. These developments are anticipated to come forward rapidly owing to the limited lifespan of the prior approval and relative affordability of conversion as opposed to new build development.

2.18 The rates have been applied to developments only where there is no more robust information available to project lead in and build out times. In cases where more accurate information is available, these dates have been used instead.

Sites Allocated for Development (Site Allocations)

2.19 Site Allocations, where robust, up-to-date evidence exists they will come forward, form part of the first five years of supply. However, the majority of these sites are large, often complex sites, and are therefore phased as coming forward beyond five years, in line with phasing outlined in the relevant allocating document.

Windfall Sites

2.20 Paragraph 70 of the NPPF and Planning Practice Guidance states that 'windfall' assumptions for the projected rate of housing delivery on unidentified sites can be included in assessments of potential housing supply, providing there is 'compelling evidence' that such sites have consistently become available in the area and will continue to provide a reliable source. Any allowance should be realistic and have regard to both historic windfall delivery rates and expected future trends.

2.21 The GLA SHLAA 2017⁴ considers three potential methodologies for windfall assumptions and gives an annual figure based on each. In summary, these are:

- An 8 year trend based rate providing a per annum windfall figure of 181 units;
- A 12 year trend based rate providing a per annum windfall figure of 184 units;
- Modelled Approach⁵ resulting in an annual windfall figure of 680 units.

2.22 The Draft London Plan, following the inspectors report, takes a more conservative modelled approach and sets a target of 280 units per annum over ten years on small sites for Hounslow as a component of the ten-year housing target set out for Hounslow from 2019/20-2029/30 of 17,820 dwellings per annum. Given this target is likely, but not adopted, the council will seek to meet this figure through the approach to small sites in the Local Plan Reviews. The scope of the SACA took in all sites in the borough, including small sites and

⁴ Greater London Authority (2018) Strategic Housing Land Availability Assessment available at:
https://www.london.gov.uk/sites/default/files/2017_london_strategic_housing_land_availability_assessment.pdf

⁵ Ibid, pp.128

these will also contribute to meeting the small sites figure. However, to account for the significant uncertainty in delivery on these types of sites, as a result of policy H2, the trajectory applies a 50% discount to the small sites target over the plan period, before adding to this the small sites identified in the assessment. The London Plan ten-year targets recognise that in order to deliver a step change in delivery, housing delivery targets must take place over longer than five year time periods.

- 2.23 Added to this are the Small Capacity Sites (<25 units can be delivered, see results of stage 2), of 792 units, phased over the first ten years, accounting for an additional 79 units per annum.

The Housing Trajectory (2020/21 to 2034/35)

- 2.24 Figure 2 shows the trajectory for the next 15 years as well as the adopted and draft housing targets for the borough.

Years 1-5

- 2.25 The London Plan target for the first five years, between 1st April 2020 to 31st March 2025 is 4,316 dwellings. The supply of deliverable sites for this period is expected to be 10,042 dwellings, or 232% of the London Plan minimum requirement. Against the draft London Plan Target, which would equate to 9,356 dwellings, the equivalent figure would be 107% of the target.

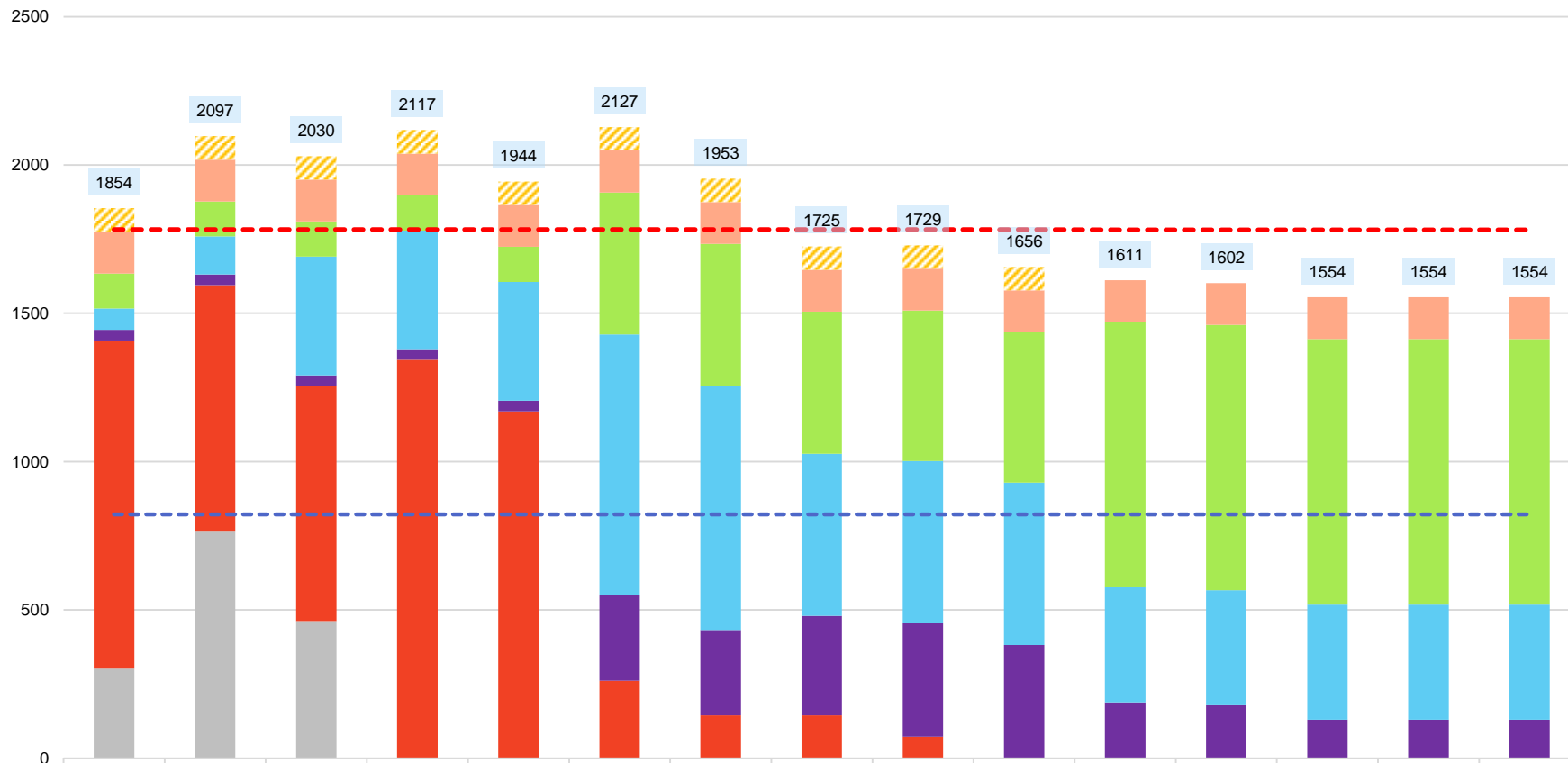
Years 6-10

- 2.26 The London Plan Target for the second five years, between 1st April 2024 and 31st March 2029 is 4110 dwellings. The supply of deliverable sites for this period is expected to be 9,191 dwellings, or 224% of the London Plan minimum requirement.

Years 11-15

- 2.27 The London Plan Target for the second five years, between 1st April 2027 and 31st March 2032 is 4110 dwellings. The supply of deliverable sites for this period is expected to be 7,874 dwellings, or 191% of the London Plan minimum requirement.

Figure 2 – Housing Trajectory



	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35
Brownfield Register	79	79	79	79	79	79	79	79	79	79					
Windfall	141	141	141	141	141	141	141	141	141	141	141	141	141	141	141
Site Allocations WOB	118	118	118	118	118	479	479	479	507	507	895	895	895	895	895
Site Allocations GWC	71	128	400	400	400	880	823	547	547	547	388	388	388	388	388
Site Allocations ROB	36	36	36	36	36	288	288	335	381	381	188	178	130	130	130
Phased Pipeline Schemes	1106	831	793	1343	1169	261	144	144	73						
Non Phased Schemes	302	764	462												
ItP London Plan Target (1782)	1782	1782	1782	1782	1782	1782	1782	1782	1782	1782	1781	1781	1781	1781	1781
London Plan (2016) Target (822)	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822
Net Projection	1854	2097	2030	2117	1944	2127	1953	1725	1729	1656	1611	1602	1554	1554	1554

Non Phased Schemes
 Phased Pipeline Schemes
 Site Allocations ROB
 Site Allocations GWC
 Site Allocations WOB
 Windfall
 Brownfield Register
 ItP London Plan Target (1782)
 London Plan (2016) Target (822)
 Net Projection

Affordable Housing

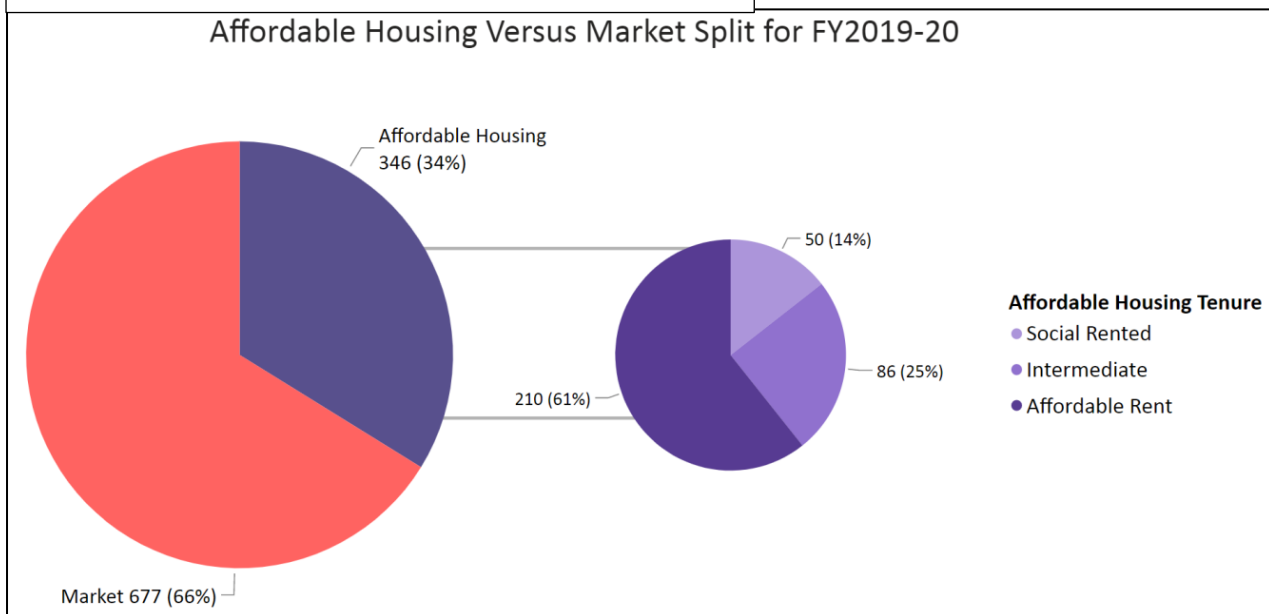
2.28 The Council is committed to the delivery of affordable housing in the borough. The administration supports the delivery of a further 3,000 affordable homes in the borough to rent or buy, either on development sites, with planning consent or as allocated housing sites in adopted plans.

Affordable Housing Completions

2.29 The Local Plan sets a strategic target of 40% of additional housing delivered over the plan period should be affordable. This is then split between 60% Affordable Rent or Social rent and 40% Intermediate Tenures. The council is limited in how it can apply this approach to development, with only full or outline planning permissions for developments of more than 10 units able meeting the policy test.

2.30 Smaller applications and notably, other types of application such as Prior Approval Class O (known as Office to Residential Permitted Development) cannot be required to provide affordable housing. This does not prevent applicants from providing it, but it does mean that statistics must be split between a Strategic view of the proportion of all residential units, and a policy compliancy view only looking at developments required to provide affordable housing. This is set out below in table 2-4, overleaf.

Figure 3 – Affordable Housing Versus Market Split



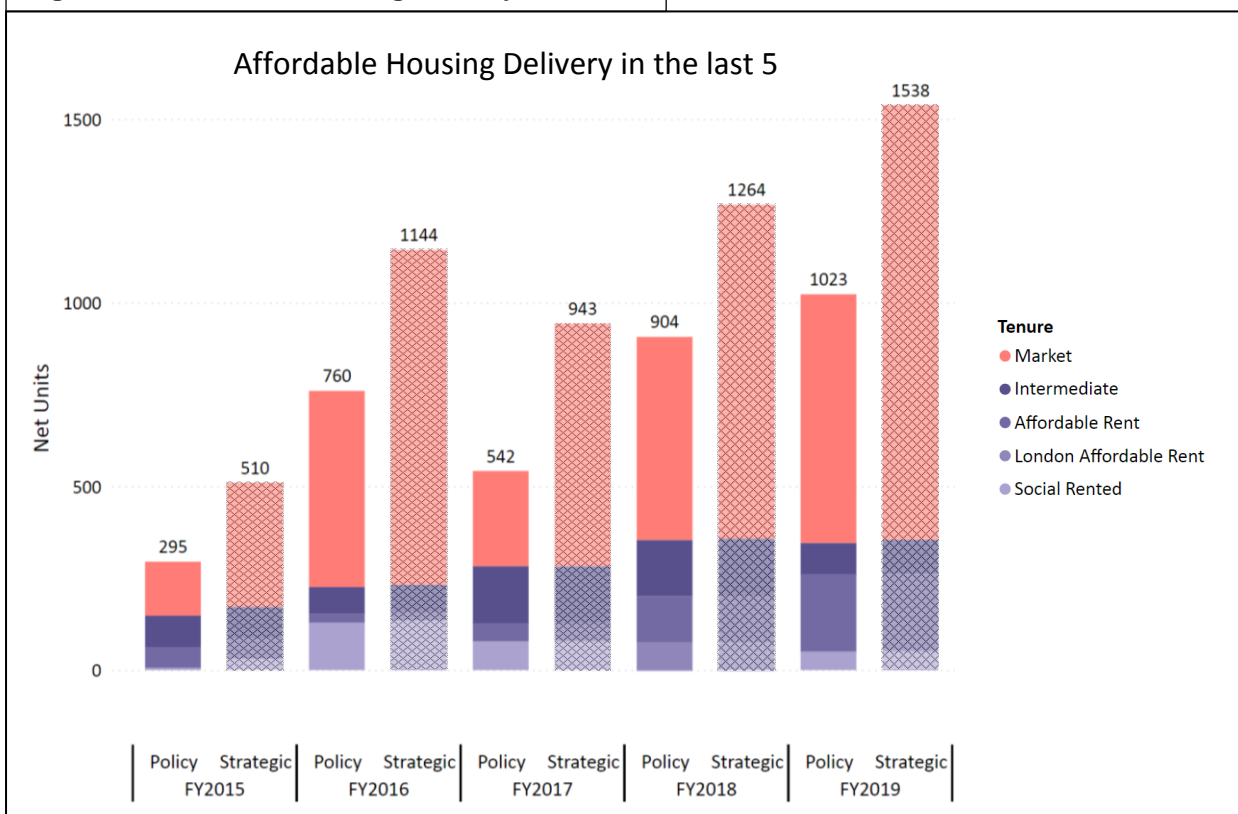
Financial year	Tenure	Strategic Output ⁶		Policy Output ⁷	
		Net Units	%	Net Units	%
FY2015	Affordable Rent	56	11%	56	19%
	Intermediate	86	17%	86	29%
	Market	338	66%	147	50%
	Social Rented	30	6%	6	2%
	Total	510		295	
FY2016	Affordable Rent	24	2%	24	3%
	Intermediate	73	6%	73	10%
	Market	912	80%	534	70%
	Social Rented	135	12%	129	17%
	Total	1144		760	
FY2017	Affordable Rent	48	5%	48	9%
	Intermediate	157	17%	157	29%
	Market	660	70%	259	48%
	Social Rented	78	8%	78	14%
	Total	943		542	
FY2018	Affordable Rent	126	10%	126	14%
	Intermediate	157	12%	153	17%
	London Affordable Rent	75	6%	75	8%
	Market	909	72%	553	61%
	Social Rented	-3	0%	-3	0%
	Total	1264		904	
FY2019	Affordable Rent	210	14%	210	21%
	Intermediate	94	6%	86	8%
	Market	1183	77%	677	66%
	Social Rented	51	3%	50	5%
	Total	1538		1023	
Last 5 Years					
All tenures	Affordable Rent	464	9%	464	13%
	Intermediate	567	11%	555	16%
	London Affordable Rent	75	1%	75	2%
	Market	4002	74%	2170	62%
	Social Rented	291	5%	260	7%
	Total	5399		3524	
Affordable tenures only	Affordable Rent	464	33%	464	34%
	Intermediate	567	41%	555	41%
	London Affordable Rent	75	5%	75	6%
	Social Rented	291	21%	260	19%
	AH Total	1397		1354	

⁶ All units from all schemes completed in the year

⁷ Only units from applications triggering the affordable housing policy (SC2)

- 2.31 The table indicates that overall, 1397 units of Affordable Housing have been completed in the borough over the last five years, or 26% of overall supply, with 830 units being affordable rent, socially rent or London Affordable Rent (LAR).
- 2.32 However, when taken in policy performance terms, the ratios of affordable housing delivered as part of schemes where affordable housing could be required is significantly closer to the strategic target of 40%, with a total of 38% of units completed in affordable tenures.
- 2.33 In terms of tenure split, the overall proportion of Affordable/LAR/Social Rent to Intermediate was 59% to 41% reflecting effective working of this policy at present.

Figure 4 – Affordable Housing Delivery, last five

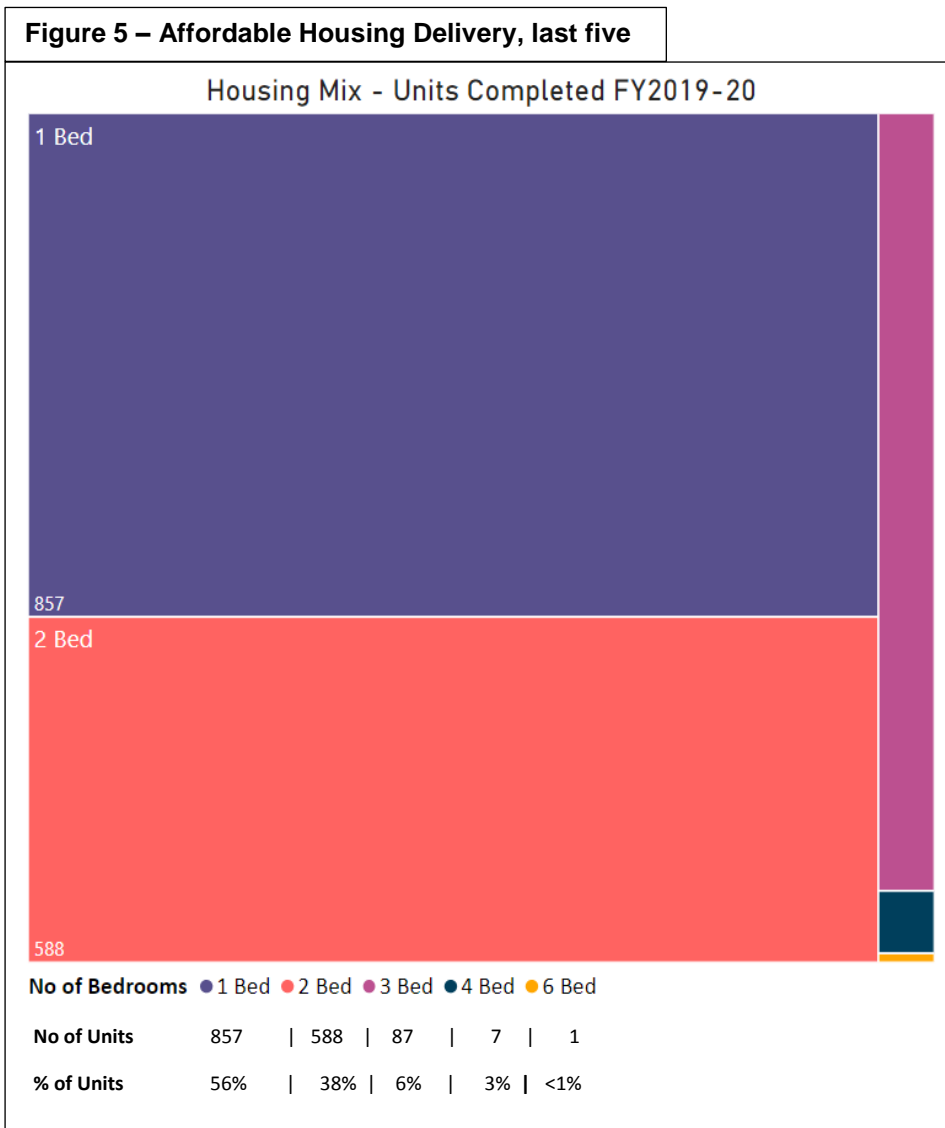


Housing Mix

- 2.34 An important part of understanding the need and demand for housing is to ensure that new housing is of an appropriate size and type, and that the existing stock is managed appropriately.
- 2.35 The table below shows the total units delivered over the last 5 years broken down by unit size (i.e. number of bedrooms).

Table 2-5 Delivery by bedroom size						
Financial Year (FY)	Number of Bedrooms					
	1	2	3	4	5	6
FY2015	235 (40%)	257 (43%)	81 (14%)	15 (3%)	4 (1%)	0 (0%)
FY2016	521 (45%)	419 (37%)	189 (16%)	14 (1%)	2 (<1%)	2 (<1%)
FY2017	497 (53%)	302 (32%)	72 (8%)	34 (4%)	37 (4%)	1 (<1%)
FY2018	481 (38%)	557 (44%)	198 (16%)	35 (3%)	-1 (0%)	-1 (0%)
FY2019	857 (56%)	588 (38%)	87 (6%)	7 (<1%)	0 (0%)	1 (<1%)

2.36 The table indicates that there has been a slight increase in the proportion of 1 bed units in FY2019 (see Figure 5 for breakdown). This is largely accounted for by the large number of single bed units delivered through prior approval schemes in the reporting year; of a total 392 units in this category (accounting for approximately 25% of total housing delivery), 93% were single unit dwellings, with the remaining 7% being made up of mostly 2 bed units and one 3 bed unit.



3. Open Space

Green Belt and Metropolitan Open Land

- 3.1 The Metropolitan Green Belt is a significant feature of the borough and covers around 1,220ha – approximately 21.7% of the borough’s land area. Chapter 13 of the NPPF sets out the government’s approach to protecting Green Belt land, and states that the government “attaches great importance” to Green Belts. NPPF Paragraph 133 states that the essential characteristics of Green Belts are their openness and their permanence, whilst paragraph 134 sets out various functions of Green Belt which, of particular importance for Hounslow, include preventing urban sprawl by keeping land permanently open and safeguarding the countryside.
- 3.2 Regarding planning proposals affecting Green Belt land, NPPF paragraph 143 establishes that inappropriate development is, by definition, harmful and should not be approved except in exceptional circumstances. NPPF Paragraphs 144 requires local planning authorities to ensure that substantial weight is given to any harm to the Green Belt, and paragraphs 145-147 define what should be considered inappropriate development and the exceptions to this.
- 3.3 The London Plan states that Metropolitan Open Land (MOL) is afforded the same status and protection as Green Belt land, and should be protected from inappropriate development in accordance with national planning policy tests set out in NPPF chapter 13. MOL has an important role to play as part of London’s multifunctional green infrastructure and the Mayor is keen to see improvements in its overall quality and accessibility.
- 3.4 The following tables shows the total quanta of open land taken by inappropriate development through applications where very special circumstances have been demonstrated, as per national policy. The data is broken down by applications approved and completed on both Green Belt and MOL land over the last 5 financial years⁸.

⁸ For the sake of accuracy and consistency, the figures given for loss/gain in open land through inappropriate development reflect only the quanta of land taken by built form (i.e. building footprints) and any hard standing or access roads associated with the development considered to be inappropriate as a part of a given scheme. All figures are given in hectares (ha).

Table 3-1: Total land take through inappropriate development – applications approved over the last 5 years		
Designation	Financial Year of permission	Open Space Loss/Gain (ha)
Green Belt	FY2015	0
	FY2016	0
	FY2017	-0.229
	FY2018	-0.072
	FY2019	-0.94
	Total	-1.241
Metropolitan Open Land (MOL)	FY2015	-0.96
	FY2016	0
	FY2017	-0.007
	FY2018	-0.102
	FY2019	-0.36
	Total	-1.429
Total GB and MOL open space loss/gain (five years)		-2.671

Table 3-2: Total land take through inappropriate development – applications completed over the last 5 years		
Designation	Financial Year of Completion	Open Space Loss/Gain (ha)
Green Belt	FY2015	0
	FY2016	-0.148
	FY2017	0
	FY2018	0
	FY2019	0
	Total	-0.148
Metropolitan Open Land (MOL)	FY2015	0
	FY2016	0
	FY2017	-0.081
	FY2018	-0.96
	FY2019	0
	Total	-1.041
Total GB and MOL Open Space loss/gain (five years)		-1.189

- 3.5 Table 3-1 shows that the Council approved applications involving the loss of 1.24ha of open land designated as Green Belt, and the loss of 1.43ha open land designated as MOL, through inappropriate development over the past 5 years (2.67ha in total).
- 3.6 This includes 2 approvals for industrial/warehousing (B1c/B2/B8) schemes within Green Belt land in the West of Borough: Segro Park Heathrow (00504/AE/P22) and Cargo Service Centre (01660/B/P6). These 2 permissions would amount to a combined loss of 0.98ha open land in total.
- 3.7 Table 3-2 shows the total loss/gain of open land through approved developments that have completed over the past 5 years. Of these, 0.15ha (or approximately 1500m²) of Green Belt land (made up entirely of land take associated with permission 01145/F/P19 at Feltham Community College) and a further 1.04ha (or approximately 10,400m²) MOL has been lost to inappropriate development (1.19ha in total).

Open Space Provision

- 3.8 In order to assess whether there has been a reduction (or no net increase) in any areas in the borough found to be deficient in access to open space over the last 5 years it is necessary to consider 3 dimensions for assessing open space deficiency: quantitative deficiency, qualitative deficiency and accessibility.
- 3.9 It should be noted that due to the in-depth nature of this analysis, it is not possible to update monitoring of open space deficiency annually at present. As such, monitoring has been conducted as part of the evidence base gathering for Local Plan preparation. The most up-to-date open space data has been collected as part of an Open Space Study to support the emerging GWC and WoB Local Plan review⁹, which updates the 2011 baseline for the Local Plan 2015¹⁰.

Quantitative Assessment

- 3.10 The following table 3-3 outlines a quantitative assessment of open space provision within the borough completed as part of the Open Space Study (2018)¹¹. The assessment breaks the borough down into 5 sub areas and assesses the current open space provision of each against a recommended quantity standard (land area (ha) per 1000 population) in each of the following 4 open space types: parks and gardens; natural & semi-natural; amenity greenspace; and allotments.

⁹ Please see LBH Open Space Study (September 2018) and LB Hounslow Local Plan Reviews: Open Spaces Background Paper (September 2020) for more details

¹⁰ See Open Spaces Background Paper (September 2020) section 4 for further details on how this compares with previous Local Plan 2015 evidence base findings (particularly paragraph 4.3-4)

¹¹ See Section 11.3 and Table 11.3.1 in LBH Open Space Study (September 2018)

Table 3-3 Quantitative Assessment of Open Space								
Analysis Area	Parks and Gardens		Natural & Semi-natural		Amenity Greenspace		Allotments	
	(Hectares per 1000 population)							
	0.85		1.74		0.64		0.21	
	Current provision	+ / -	Current provision	+ / -	Current provision	+ / -	Current provision	+ / -
Chiswick Area	0.10	-0.75	0.07	-1.67	0.48	-0.15	0.37	0.16
Isleworth and Brentford Area	1.90	1.06	2.43	0.69	0.76	0.13	0.17	-0.04
North Central	0.40	-0.45	0.26	-1.48	0.68	0.04	0.15	-0.06
South Central	0.27	-0.58	1.89	0.15	0.10	-0.53	0.16	-0.05
West Area	1.21	0.36	3.02	1.28	1.04	0.40	0.25	0.04

3.11 The table suggests that most areas have a shortfall in some form of open space provision. The exception is the West Area which is above the recommended quantitative standards in all types of open space.

Qualitative Assessment

3.12 The following table 3-4 outlines a qualitative assessment of open space provision within the borough undertaken as part of a 2018 audit used to inform the Open Space Study. The audit covered the typologies of open space listed below:

- Parks and gardens
- Natural and semi-natural greenspace
- Amenity greenspace
- Provision for children and young people
- Allotments
- Cemeteries/churchyards
- Green corridors

The table summarises the qualitative deficiencies in terms of both the number and type of low quality sites within each sub area.

Table 3-4 Qualitative Assessment of Open Space, Low Quality Sites		
Analysis area	Number of low quality sites	Split of typologies of low-quality sites
Chiswick	3	1 Allotment 1 Amenity Greenspace 1 Parks and Gardens
Isleworth and Brentford	9	3 Parks and Gardens 3 Play Provision 2 Amenity Greenspace 1 SNG
North Central	18	8 Amenity Greenspace 7 Play Provision 2 SNG 1 Green Corridor
South Central	8	5 Amenity Greenspaces 2 Play Provision 1 Allotment
West Area	33	12 Amenity Greenspaces 11 Play Provision 3 SNG 3 Cemeteries 3 Green Corridors 1 Parks and Garden

Accessibility

3.13 The 2018 audit also assessed the accessibility of open spaces. Areas of deficiency by accessibility were found in the following areas:

- Chiswick (allotments, parks and gardens, and play provision for older age ranges),
- Isleworth & Brentford (amenity greenspace),
- North Central Area (Parks and gardens),
- South Central Area (play provision for older age ranges) and
- West Area (allotments and parks and gardens).

Overall Conclusions

3.14 The 2018 audit found that qualitative deficiencies exist throughout the borough for certain typologies. This is illustrated by the fact that there are a range of sites, spanning various typologies and in all areas, which are scored as low quality¹².

3.15 Overall, it can be seen that there are areas of open space deficiency which are relevant to parts of both the emerging local plan review areas:

- North Central area, including Cranford & Heston (WoB)
- Isleworth & Brentford (GWC)
- West area, including Feltham & Bedfont (WoB)

¹² Please see paras 5.11 – 5.18 (inclusive) and Table 1 in the Open Spaces Background Paper (September 2020)

4. Retail and Town Centres

4.1 The 2015 Hounslow Local Plan identifies the borough’s town centres as places with a primary retail role, as well as being places to do business, and as hubs for services, leisure, cultural and community activity. The vision for the borough for 2030 in the local plan was that town centres should become hubs of cultural, leisure, community and retail activity that support the growing population, with growth being focused first at Hounslow Metropolitan Centre and Brentford District Centre and later, the smaller town centres, where accessibility is greatest and shops and services necessary for successful communities, business and quality of life.

4.2 Policy TC1 of the plan sets out the following town and neighbourhood centre network for the borough:

TOWN CENTRES	
Metropolitan Centre	Hounslow
Major Centre	Chiswick
District Centres	Brentford, Feltham
NEIGHBOURHOOD CENTRES	
Large neighbourhood centres	Hounslow West, Bedfont, Hanworth, Cranford, Isleworth, Old Isleworth
Small neighbourhood centres	36 small neighbourhood centres, as set out in Appendix 5 of the local plan.

4.3 Hounslow town centre had already, prior to the pandemic, been identified as under-performing and in need of substantial regeneration and improvements. Brentford and Feltham were also identified in the local plan as in need of improvements. Regeneration work has been underway in Hounslow and Brentford in recent years.

4.4 Since the adoption of the local plan in 2015, town centres have faced increasingly challenging circumstances, with the rise of online retail posing an alternative form of retail. This has reached a significant crisis point in 2020 with the Covid-19 pandemic posing a fundamental threat to all town centres and retail outlets.

4.5 The challenges posed by the pandemic and its aftermath only serve to strengthen the need for a local plan policy context which supports the role of town centres.

4.6 The monitoring framework of the local plan seeks to achieve the plan’s objective of supporting the borough’s town centres, by maintaining the centres as a focus for the community and to attract investment, through an improved retail and service offer; new leisure and cultural facilities; and new residential quarters. It seeks to achieve enhanced public realm and environmental improvements to help build the identity of town centres.

4.7 Two indicators are used under this objective:

- 1.1 Percentage of Total Permitted Floorspace for Main Town Centre Uses in side town centres. Target = 100% (annually)
- 1.2 Proportion of objectively-assessed comparison retail need delivered. Target = 100% (by 2021)

- 4.8 In terms of monitoring the performance of the borough's town centres, the most recent data is contained within the 2018 Retail and Town Centre Needs Study – Update, published in September 2018. This carried out a survey of the vacancy rates and occupier types in the four town centres of the borough, as part of the retail needs assessment for each centre.

Town Centre Vacancy Rates 2017-18

Town centre	Vacancy rate 2017 (% of units) (or year otherwise stated)	Vacancy rate 2018 (% of units)	Vacancy rate 2018 (% of floorspace) (Table 8.2 of RTCNS)
Hounslow	7	5	4
Chiswick	7	3	2
Brentford	10 (2016)	3	4
Feltham	4 (2015)	1	0

Source: Retail and Town Centre Needs Study – Update: September 2018.
Figures are from Experian Goad Surveys.

- 4.9 The retail assessment notes that the UK average vacancy rate is 11 per cent, so these figures indicate that all four town centres had performed well against this benchmark. However, this data was all collected well before the Covid-19 pandemic, and this will clearly have had a major impact on all town centres since then.

Town Centre Occupancy Rates, by type (2018) (all figures % of units)

Town centre	Convenience	Comparison	Retail Service	Leisure Service	Financial and Business Service
Hounslow	11	36	11	25	11
Chiswick	10	35	17	24	10
Brentford	13	16	19	33	12
Feltham	15	29	20	23	12
UK average (for comparison)	9	32	14	24	11

Source: Retail and Town Centre Needs Study – Update: September 2018.
Figures are from Goad Surveys. UK figure is from February 2018.

Town Centre Occupancy Rates, by type (2018) (all figures % of floorspace)

Town centre	Convenience	Comparison	Retail service	Leisure service	Financial & business service
Hounslow	19	42	4	21	8
Chiswick	20	33	11	25	9
Brentford	16	12	11	31	26
Feltham	45	34	6	9	6
UK average (for comparison)	15	35	7	25	8

Source: Retail and Town Centre Needs Study – Update: September 2018.
 Figures are from Experian Goad Surveys. UK figure is from February 2018.

4.10 When compared with the UK-wide figures set out in the tables, it can be seen that the mix in Hounslow’s town centres is generally in broad consistency with the national averages. The exceptions are that Feltham has a greater proportion of convenience units and floorspace than the national average, and Brentford has a proportionately low amount of comparison floorspace. Hounslow and Chiswick have proportions of different types of occupier which closely mirror the national averages.

4.11 Again, it should be borne in mind that these figures date from 2018, and therefore have not taken account of the impacts of the Covid-19 pandemic in 2020.

5. Employment

- 5.1 The 2015 Hounslow Local Plan took forward policies based on an Employment Land Review dating from 2011, which identified a demand for an additional 200,000 sqm of office floorspace during the plan period and which did not set out a requirement for industrial land. Policy ED2 took an approach of consolidating the borough's major industrial and office sites. This was to be achieved by protecting designated employment sites and setting a monitoring benchmark for the loss of industrial land at 6ha across the plan period, to ensure that an adequate supply of industrial capacity is maintained throughout the plan period.
- 5.2 It has been subsequently accepted that the approach to industrial land was out of date, because the evidence base in 2011 did not envisage expansion in this area, and in fact forecast negative growth which was reflected in the borough's categorisation as an area for the limited release of industrial land in the Further Alterations to the London Plan submission 2014.
- 5.3 But the strategic priorities and trends have since changed significantly. It is now accepted that London cannot continue losing large amounts of industrial land, and the New London Plan has taken an approach of encouraging industrial intensification to ensure that there is no net loss of such land. Evidence has pointed to stronger growth, and Hounslow was categorised as a Retain Capacity borough in the draft NLP.
- 5.4 In Hounslow, however, these trends are even more tangible at local level. The subsequent evidence base in the form of the 2016 Employment Land Review (updated in 2020) projects a substantial requirement for additional industrial land, driven primarily by the growth of logistics industries near to Heathrow Airport and the strategic road network.
- 5.5 Therefore, policies ED1 and ED2 of the local plan were based on promoting office-based employment in the borough's four town centres, as well as employment-based growth within the GWC, and directing industrial/warehousing and related development to the borough's existing designated industrial sites, which comprise strategic industrial locations (SILs – identified by the Mayor of London) and locally significant industrial sites (LSISs, identified at borough level).
- 5.6 But the revised evidence base and evolving strategic framework have meant that the borough has had to take a fresh approach in the latest local plan reviews, and has had to consider ways of bringing much greater quantum of additional land forward to provide for employment growth. This includes the limited release of land in the Green Belt to provide an additional supply of land suitable for these uses.
- 5.7 The borough has been further impacted very significantly by the coronavirus pandemic during the course of 2020. For the purposes of plan-making for a 15-year period, the Council considers overall that it is too early to conclude on the long-term implications of the pandemic for the local economy.
- 5.8 The result of all this is that monitoring framework from the local plan should be read with these various factors in mind. The framework seeks to achieve the plan's objective of encouraging inward investment and facilitating job growth by maintaining the supply of employment land, allocating development sites to accommodate forecast employment growth and supporting our existing employers to expand. It seeks to achieve the plan's objective of making the borough an attractive place to do business by creating an environment conducive to entrepreneurs and ensuring residents are appropriately skilled.

5.9 Three indicators are used under this objective:

- Indicator 2.1: Amount of industrial land lost (with a target that net loss of industrial land is 6ha or less across the borough during the plan period)
- Indicator 2.2: Net change in B1a office floorspace, with a target of 90,000sqm being achieved by 2030
- Indicator 2.3: Net additional hotel rooms

5.10 For the purposes of monitoring the supply of employment land, the following tables show the completions of industrial and office floorspace over the past six financial years, as well as the pipeline of schemes in each category which have not yet been started or are under construction as of the end of the financial year 2019-20.

Financial year	B2 change (sqm)	B8 change (sqm)	B2/B8 change (sqm)
2014-15	799	0	799
2015-16	-30,720	-4292	-35,012
2016-17	1498	-3277	-1779
2017-18	0	-573	-573
2018-19	3130	-4743	-1613
2019-20	0	0	0
TOTAL CHANGE 14-20	-25,293	-12,885	-38,178
Pipeline of supply @ 31/3/20	-20,740	186,297	165,557

Source: Hounslow Council monitoring data

5.11 The figures show a continuing gradual loss of industrial land across the B2 and B8 use classes across most of the financial years covered in the analysis. It shows a negative pipeline for B2 industrial land and a substantial positive pipeline for the B8 storage and distribution use classes.

5.12 It should be noted, however, that the large majority of this positive pipeline consists of the proposed subterranean warehousing and storage facility at Rectory Farm in Cranford (planning application reference P/2016/5112). This is a scheme for which the council has granted planning permission for (latest planning application reference: P/2016/5112). Nevertheless, given the scale and nature of this unique scheme, there remain uncertainties over its deliverability. The Council considers that it is unlikely to be achievable within the next five years, but is a potential longer-term scheme. For the purposes of the monitoring data, when the Rectory Farm scheme (177,500 sqm) is taken out of the equation, the pipeline for the B8 use class reduces to 8,797sqm, and the overall pipeline for industrial land across the B2 and B8 use classes reduces to a negative figure of 11,943 sqm.

5.13 So overall, the figures point to a loss of 3.8ha during the period covered, and with a pipeline showing a potential loss of a further 1ha of land in B2 and B8 uses.

Table 5-2 Change in employment land 2014-20, and employment land pipeline (Use Class B1)	
Financial year	B1 change (sqm)
2014-15	1961
2015-16	64,841
2016-17	-18,233
2017-18	1420
2018-19	-28,332
2019-20	-11,871
TOTAL CHANGE 14-20	9,786
Pipeline	-39,477

Source: Hounslow Council monitoring data

5.14 The figures for B1 floorspace show a fluctuating trend over the period, but most years deliver a loss of B1 floorspace and it is only due to a large gain in 2015-16 – resulting from the completion of two major schemes, at Sky and at Bedfont Trading Estate - that an overall positive figure is achieved. Furthermore, there is also a substantial negative pipeline of almost 40,000 sqm.

Appendix 1: Draft Local Plan Review Site Allocations informing the Housing Trajectory 2019/20

Reg 19 Site Allocation ID	Site Name	Ward	Phasing	2020/21	2021/22	2022/23	2023/24	2024/25	Phase 2	Phase 3
2	Tesco Osterley	Osterley and Spring Grove Ward	2024-2029						1030	0
3	Gillette Factory	Osterley and Spring Grove Ward	2024-2029						0	240
5	West Cross Campus	Osterley and Spring Grove Ward	2019-2034						900	900
6	BSS Brentford	Osterley and Spring Grove Ward	2024-2029						120	0
7	Profile West Brentford Car Park	Osterley and Spring Grove Ward	2024-2029						30	0
11	Homebase Syon Lane	Osterley and Spring Grove Ward	2019-2024			74	74	74	148	0
12	Former Syon Gate Service Station Gillette Corner	Osterley and Spring Grove Ward	2019-2024						20	0
13	Harlequin Avenue Sub station	Osterley and Spring Grove Ward	2029-2034						0	10
16	Brentside Park	Osterley and Spring Grove Ward	2019-2024			78	78	78	156	0
17	Great West Plaza	Syon Ward	2019-2024			76	76	76	152	0
18	Great West House	Syon Ward	2019-2024						0	70
24	Layton Road Warehouses	Brentford Ward	2019-2024			8	8	8	16	0
26	Phoenix Business Park	Brentford Ward	2019-2024						130	130
28	27 Great West Road	Brentford Ward	2024-2029						250	250
29	EMC Tower	Brentford Ward	2019-2024						0	420
30	Vantage West	Brentford Ward	2019-2024						130	0
31	1-4 Capital Interchange Way	Brentford Ward	2019-2024	76	76	76	76	76	0	0
32	Brentford Fountains Leisure Centre	Brentford Ward	2019-2024		60	60	60	60	60	0
33	Esso Filling Station Chiswick Roundabout	Brentford Wards	2019-2024						30	0
34	Former Natwest Bank Site, Chiswick	Turnham Green Ward	2019-2024						120	0
35	B&Q Chiswick	Turnham Green Ward	2019-2024			54	54	54	108	0
37	Gunnersbury Station Car Park	Turnham Green Ward	2019-2024						120	0
39	South Bedfont	Bedfont Ward	2024-2029						0	910
40	Bedfont Gardens	Bedfont Ward	2024-2029						0	650
41	Bedfont Gardens, Land at Southville Crescent	Bedfont Ward	2024-2029						0	120

42	Land at Bedfont Lakes (West) 753 Staines Road, Feltham	Bedfont Ward	2029-2034						0	140
50	Tesco Dukes Green Avenue	Feltham North Ward	2024-2029						60	150
51	Network House Feltham	Feltham North Ward	2024-2029						0	200
52	Lidl Feltham	Feltham North Ward	2029-2034						0	220
53	New Road Triangle	Feltham North Ward	2019-2024	22	22	22	22	22	0	0
54	61 Fern Grove	Feltham North Ward	2019-2024	12	12	12	12	12	0	0
55	Scout Hut Bedfont Lane	Feltham North Ward	2019-2024						30	0
56	Land at Glebelands Road	Feltham North Ward	2019-2024	14	14	14	14	14	0	0
58	Lower Feltham West	Feltham West Ward	2019-2024						65	65
59	Tesco Feltham	Feltham West Ward	2024-2029						170	0
61	Council Depot, Ashmead Road	Feltham West Ward	2024-2029						0	50
62	Manor Park, Feltham	Feltham West Ward	2029-2034						0	80
63	80-86 High Street Feltham	Feltham West Ward	2029-2034						0	200
64	MOD Feltham	Hanworth Park Ward	2024-2029						685	685
65	Leisure West	Hanworth Park Ward	2024-2029						0	310
66	Browells Lane	Hanworth Park Ward	2024-2029						210	210
67	UPS House	Hanworth Park Ward	2019-2024						0	170
68	Smith House, Elmwood Avenue	Hanworth Park Ward	2019-2024	40	40	40	40	40	0	0
69	Land at 2 High Street Feltham	Hanworth Park Ward	2019-2024						90	0
70	Royal Naval Association Club	Hanworth Park Ward	2019-2024						20	0
71	Feltham Magistrates Court	Hanworth Park Ward	2019-2024						20	0
72	St. Catherine's House and Car Park	Hanworth Park Ward	2019-2024						20	0
73	Land at Nene Gardens	Hanworth Ward	2019-2024						40	0
74	Hounslow West Station	Heston Central Ward	2019-2024						360	0
75	Land to the rear of HCC Sports and Social Club	Heston East Ward	2019-2024	2	2	2	2	2	0	0
76	Lampton House	Heston East Ward	2019-2024						90	0
80	34 Staines Road	Hounslow Heath Ward	2019-2024	12	12	12	12	12	60	0
81	80-82 Staines Road	Hounslow Heath Ward	2019-2024						50	0
82	206-210 Hanworth Road	Hounslow Heath Ward	2024-2029						80	0
83	Vacant Land Clarence Terrace	Hounslow Heath Ward	2024-2029						30	0

84	Hounslow Cavalry Barracks	Hounslow West Ward	2019-2029						500	500
85	Builders Yard, 379-389 Staines Road	Hounslow West Ward	2019-2024	4	4	4	4	4	0	0
86	Former Travis Perkins Staines Road	Hounslow West Ward	2019-2024	2	2	2	2	2	0	0
87	Euro House, Hounslow	Hounslow Central Ward	2019-2024						0	80
88	Land at Bridge Road Depot	Hounslow Central Ward	2019-2024						10	0
89	Land at James Street	Hounslow Central Ward	2019-2024	14	14	14	14	14	0	0
90	Inwood Business Park	Hounslow Central Ward	2019-2024	6	6	6	6	6	0	0
91	Hounslow Bus Garage	Hounslow Central Ward	2024-2029						830	0
92	Upstage	Hounslow Central Ward	2019-2024						50	0
93	Land at Kingsley Road	Hounslow Central Ward	2019-2024						30	0
94	Vacant Land R/O Princes Avenue, Gunnersbury	Isleworth Ward	2019-2024						10	0
95	Tesco Mogden Lane	Isleworth Ward	2024-2029						97	243
96	Europa House	Isleworth Ward	2019-2024	4	4	4	4	4	0	0
97	30 Rugby Road	Isleworth Ward	2019-2024						60	0
98	Osterley Station Car Park	Osterley and Spring Grove Ward	2019-2024						50	0
99	Feltham Coachworks	Osterley and Spring Grove Ward	2019-2024						10	0
100	Osterley Park Hotel	Osterley and Spring Grove Ward	2019-2024						80	0
101	Brentford Group Practice	Syon Ward	2019-2024						50	10
103	West Middlesex Hospital	Syon Ward	2019-2029						150	100
104	Chiswick Health Centre	Turnham Green Ward	2019-2024						30	0
105	Chiswick Telephone Exchange	Turnham Green Ward	2019-2024	8	8	8	8	8	0	0
106	Royal Mail, Chiswick Delivery Office	Turnham Green Ward	2019-2024	6	6	6	6	6	0	0
107	Sainsbury's Chiswick	Turnham Green Ward	2024-2029						195	195
108	Empire House	Turnham Green Ward	2019-2024						110	0
113	69 to 77 Boston Manor Road	Hounslow Central Ward	2029-2034						0	20
114	Royal Mail Delivery Office		2024-2034						0	140
115	Vacant site, Hanworth Road, Hanworth Road, TW3 3UA		2019-2024	18	18	18	18	18	0	0