



London Borough
of Hounslow

Hounslow's Local Plan

Authority Monitoring Report

2020/21

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 31st 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 2020 to 31 March 2021.

Local Development Scheme

- 1.5 The Council's Local Plan was adopted on 15th September 2015 following public examination. 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 submitted the draft submission Local Plan Reviews Volumes 2, 3 and 4 to the Planning Inspectorate on 14th December 2020. Focussed hearing sessions took place between Tuesday 9th and Monday 29th November 2021. The Inspectors' Post Hearings Letter dated 17th December 2021 set out a number of tasks for the Council to undertake before further hearings can take place. The Council responded on 31st January 2022 to set out how and when these tasks will be completed. It is anticipated that the next round of public examination will take place in October/November 2022. Following receipt of the Inspectors report, the Local Plan Reviews are expected to be adopted in 2023.

2. Housing

Housing Supply

- 2.1 A revised National Planning Policy Framework (NPPF) was published in July 2021. Paragraph 68 requires plan making authorities 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 74. This requires that an additional 5% buffer should be demonstrated to ensure choice and competition in the market, 10% where the plan making 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 where this indicates that delivery was below 85% of the borough's housing requirement. The Housing Delivery Test 2020 measurement indicated that Hounslow achieved a 154% result which means that Hounslow delivered significantly more than its requirement and as such has no sanctions applied as a result of the Test.
- 2.2 The glossary of the NPPF sets out that:
- “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.”*
- 2.3 As such, 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. This is based upon a historic lapse rate of 4% over the last 10 years in Hounslow (See Table 2-1, overleaf). A particularly cautious approach has been taken, adding an additional 2% to the lapse rate in years 0-5 and additional 1% to the lapse rate in years 6-10, accounting for any potential delayed knock-on effects arising from the 2020-2021 national lockdown periods:
- 6% for years 0-5
 - 5% for years 6-10
 - 4% for years 11-15
- 2.4 A discount has also been applied to pipeline sites in the Housing Trajectory with planning permission, which is based on the historic lapse rate of sites in the borough permitted for residential use (derived from the number of homes permitted at sites which have lapsed divided by the total number of homes permitted over the same period). The full lapse rate has been applied for sites where construction has not started and half of the full lapse rate has been applied for sites where

construction has commenced, reflecting the lower probability of commenced applications lapsing:

- 4% for permissions not started
- 2% for permissions commenced

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%

- 2.5 The now superseded London Plan 2016 set a minimum annual housing delivery target of 822 homes in Hounslow equating to a minimum housing delivery target of 8,220 homes over a 10 year period.
- 2.6 The current version of the London Plan was published in March 2021 and sets Hounslow a significantly increased housing target of 17,820 homes between 2019/20 and 2028/29, or 1,782 units per annum. As such, the housing target for the borough has increased considerably to over double the previous target. Extending the housing target over the new plan period for the emerging Local Plan Reviews to provide a 15 year target over the period 2020-2035 gives a housing target of 26,730 units. 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 (1,782 units per year)	NPPF 5% buffer in Phase 1	Total
Phase 1 (Years 1 to 5)	8,910	446	9,356
Phase 2 (Year 6 to 10)	8,910	-	8,910
Phase 3 (Year 11 to 15)	8,910	-	8,910
Total	26,730		27,176

- 2.7 In response to the increased target and to support preparation of the emerging Local Plan Review DPDs, the Council has undertaken a Site Allocations and Capacity Assessment (SACA) (2020), to find deliverable and developable sites. The SACA utilises the Housing and Economic Land Availability Assessment (HELAA) methodology in the national Planning Practice Guidance (PPG).
- 2.8 Drawing on the Greater London Authority's (GLA) Strategic Housing Land Availability Assessment (SHLAA) 2017, local evidence including the SACA 2020 and the draft site allocations, the Council have identified specific deliverable sites for the first five years of the trajectory (2021/22-2025/26), specific developable sites for years 6-10 (2026/27-2030/31) and broad locations for future growth for

years 11+ (2031/32+). Alongside the housing capacity figures identified in the SHLAA and the adopted Hounslow Local Plan 2015-2030, 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 through the Planning London Datahub (formally the London Development Database).

Overall Delivery in the Last Five Years

2.9 The London Plan new homes 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

2.10 The cumulative target for the last five years was 5070 homes (see table 2-3 below).

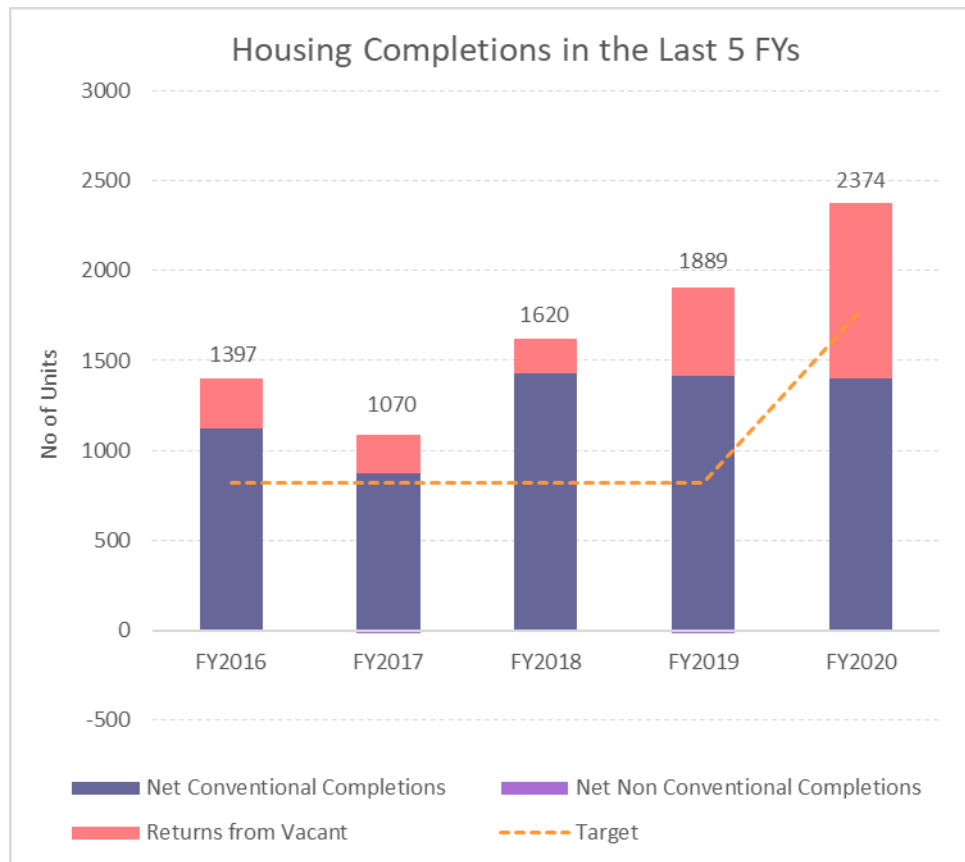


Figure 1 Housing Completions in the last 5 Financial Years

¹ Source: London Development Database

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

Table 2-3: 2015/16 to 2019/20 - Housing completions in the last five years									
FY	Net Conventional Completions	Net Non Conventional Completions	Returns from Vacant	Total Delivery	Delivery without Returns	Target	% Target	Cumulative Target	Cumulative Delivery
FY2016	1120		277	1397	1120	822	170%	822	1397
FY2017	874	-19	215	1070	855	822	130%	1644	2467
FY2018	1429		191	1620	1429	822	197%	2466	4087
FY2019	1415	-18	492	1889	1397	822	230%	3288	5976
FY2020	1400		974	2374	1400	1782	133%	5070	8350
Total	4838	-37	1175	8,350	6201	5070	165%	5070	8350

2.11 Total delivery in FY2019/20 was 2,374 units or 133% of the target.

2.12 As shown above, in Table 2-3, Hounslow has delivered a total of 8,350 units over the last 5 years, or 169% of the cumulative target, including long term vacant properties returning to use. Without returns, the 5 year completions figure would be 6,201 units, or 122% of the cumulative target.

Housing Trajectory Methodology

2.13 The Housing Trajectory sets out the Council's anticipated delivery rates for housing over the period 2020/21-2034/35, reflecting the proposed plan period for the emerging Local Plan Reviews. As set out in Table 2-3, recorded housing completions are already available for the year 2020/21, so projections are used for years 2021/22 and onwards, with a particular focus on years 2021/22-2025/26, in what is known as the five year housing land supply, in accordance with paragraph 74 of the NPPF.

2.14 The Trajectory considers three principle sources of supply:

- Sites with Planning Permission for Residential Units, taken from data entered in the Council's Monitoring System as permissions are granted. This includes Full, Outline and other relevant 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

2.15 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. Such sites are phased accordingly in the Trajectory.

2.16 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

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

assessing the average number of homes a year for a large number of sites across England.

- 2.17 Start to Finish (2020) assessed lead-in times for sites across England and found for sites between 0-99 new build units, an average lead-in of 2.0 years; for sites of 100-499 new build units an average lead-in of 1.9 years; for sites of 500-999 new build units an average lead-in of 1.7 years; and for sites of 1,000-1,499 an average lead-in of 2.3 years. The Report defines the lead-in period as the time taken from the approval of an outline, hybrid or full planning application to the first completion on a site. This provides an indicator for projected lead-in times on sites by modelling them on lead-ins for sites in the relevant size range.
- 2.18 In terms of annual delivery rates, the research indicates that for sites of between 0-99 new build units, an average delivery of between 20–40 units is achieved each year with a specific average of 22; 100-499 units deliver a much wider range of between 25-150 units per annum with a specific average of 55 units; 500-999 units deliver between 20-140 units with a specific average of 68 units; whilst 1,000-1,500 units deliver between 65-175 with a specific average of 107 units. This also provides an indicator which allows for the projection of development on sites by modelling them on the delivery trend for similar types of site.

Table 2-4: Summary of National Evidence for Lead-in Times and Build-out Rates

Evidence	Lead-in times Approval of outline, hybrid or full planning application to first completion on site (years)	Build-out rates Average delivery (dwellings per annum)
Lichfield 2020 (sites less than 100)	2.0	22
Lichfield 2020 (sites 100 to 499)	1.9	55
Lichfield 2020 (sites 500 to 999)	1.7	68
Lichfield 2020 (sites 1,000 to 1,500)	2.3	107

- 2.19 Hounslow’s permission pipeline by count of applications is dominated by small schemes of less than 10 units, but in terms of units proposed, a smaller number of major schemes make up the vast majority of pipeline supply.
- 2.20 The council has conducted 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 deliver more quickly or slowly. A large range of delivery speeds was indicated in the *Start to Finish Report* with the fastest, greenfield sites delivering more than 300 units per annum.
- 2.21 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. Prior approval conversions are anticipated to come forward rapidly owing to the limited lifespan of the prior approval (3 years from the date of approval) and relative affordability of conversion as opposed to new build development.
- 2.22 Where information from developers or other relevant sources is available, this has been used in determining the phasing of pipeline sites in the Housing Trajectory. In instances where such robust information regarding projected lead in and build

out times is not available, the rates explained above in Table 2.4 have been applied.

Sites Allocated for Development (Site Allocations)

- 2.23 Site Allocations form part of the first five years of supply where robust, up-to-date evidence exists they will come forward. 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

- 2.24 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.
- 2.25 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.
- 2.26 Following publication of the Inspectors' Panel Report for the London Plan, the Plan 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 2019/20-2028/29 of 17,820 dwellings per annum. The Council seeks to meet this figure through the approach to small sites in the Local Plan Reviews.
- 2.27 The scope of the SACA took in all sites in the borough, including small sites and these will also contribute to meeting the small sites figure. However, to account for uncertainty in delivery on these types of sites, the Trajectory applies a 50% discount to the small sites target over the plan period, and then adds the small sites identified in the SACA.
- 2.28 The London Plan ten-year targets recognise that in order to facilitate a step change in delivery, housing delivery targets must take place over longer than five year time periods. The Small Capacity Sites in Hounslow (sites where <25 units can be delivered), account for 792 homes and are phased over years 0-10 of the plan period, equating to an additional 79 units per annum until 2030. As recorded completions are available for the year 2020/21, 79 homes for small sites are phased over years 2021/22-2029/30 of this Trajectory.

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

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

- 2.29 Figure 2 shows the Trajectory for 2020-21 to 2034-35 as well as the borough's adopted Local Plan 2015 housing target and the London Plan (2021) housing target for the borough.

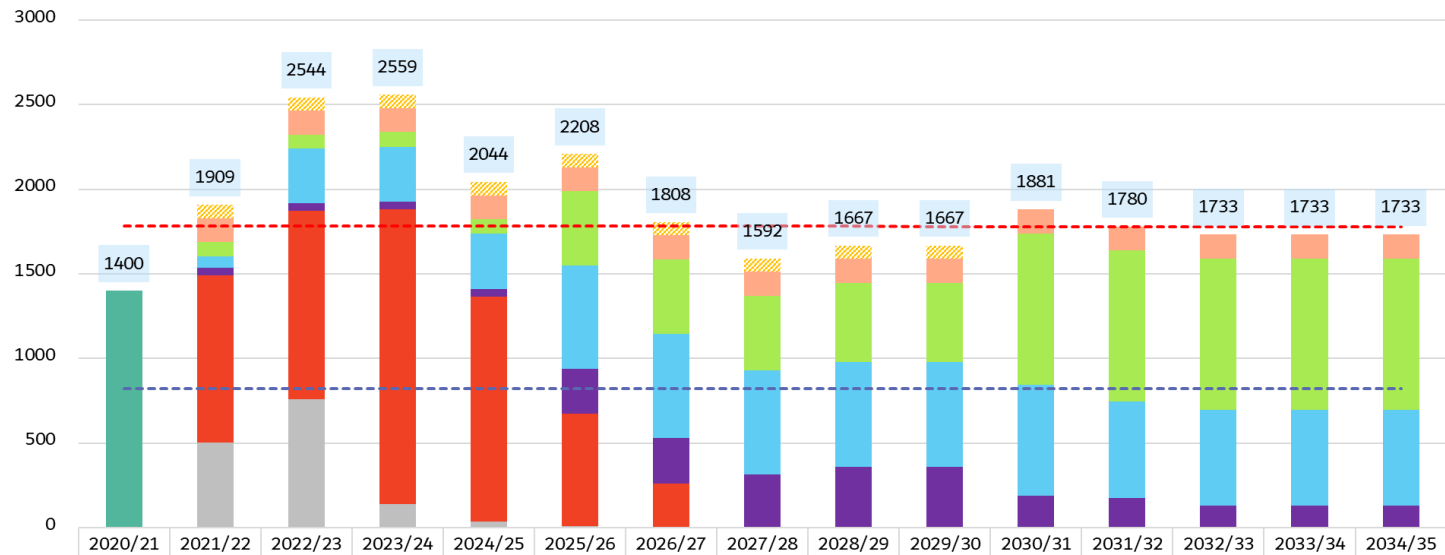
Total 15 Year Trajectory Period 2020/21 to 2034/35

- 2.30 The adopted Local Plan 2015 target applied over the full Trajectory period from 1st April 2020 to 31st March 2035, is 12,330 homes. The London Plan (2021) target applied over the same 15 year period is 26,730 homes.
- 2.31 The recorded housing completions figure in the borough for year 1 of the plan period (2020/21) is 1,400 homes and the supply of sites for years 2 to 15 of the plan period is 26,859 homes, giving a total supply of 28,259 homes over the plan period. This equates to 229% of the adopted Local Plan housing target or 106% of the London Plan 2021 target.

Five Year Supply: Trajectory Years 2-6 (2021-22 to 2025/26)

- 2.32 The adopted Local Plan 2015 target for years 2021/22 to 2025/26 of the Trajectory (between 1st April 2021 to 31st March 2026) is 4,110 homes or 4,316 homes with the requisite 5% buffer. The London Plan (2021) target for the same period is 8,910 homes or 9,356 homes with the requisite 5% buffer. The borough's supply of deliverable sites for this period is expected to be 11,264 dwellings, or 261% of the adopted Local Plan housing target with 5% added. Against the London Plan 2021 target with 5% added, the equivalent supply figure is 120% of the target.

Figure 2 – Trajectory for 2020-21 to 2034-35



		79	79	79	79	79	79	79	79	79					
		141	141	141	141	141	141	141	141	141	141	141	141	141	141
		84	84	88	87	440	440	440	468	468	895	895	895	895	895
		71	323	323	325	609	618	618	618	618	658	566	567	567	567
		45	45	44	44	267	267	314	361	361	188	178	130	130	130
		987	1110	1744	1331	663	263								
		503	761	139	36	9									
	1400														
	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822
	1782	1782	1782	1782	1782	1782	1782	1782	1782	1781	1781	1781	1781	1781	1781
Net Projection	1400	1909	2544	2559	2044	2208	1808	1592	1667	1667	1881	1780	1733	1733	1733

Net Completions
 Non Phased Schemes
 Phased Pipeline Schemes
 Site Allocations ROB
 Site Allocations GWC
 Site Allocations WOB
 Windfall
 Brownfield Register
 Local Plan 2015 Target
 LnP Target(Per Annum)
 Net Projection

Affordable Housing

2.33 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

2.34 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, Social Rent or related affordable products, 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 10 or more units able to meet the policy test.

2.35 Minor applications, and notably other types of application such as Prior Approval (including the now withdrawn Class O: 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 being delivered within affordable tenures, and a policy compliance view only looking at obligable developments. This is set out in table 2-5 overleaf.

Figure 3 Affordable Housing versus Market Split for FY2020-21

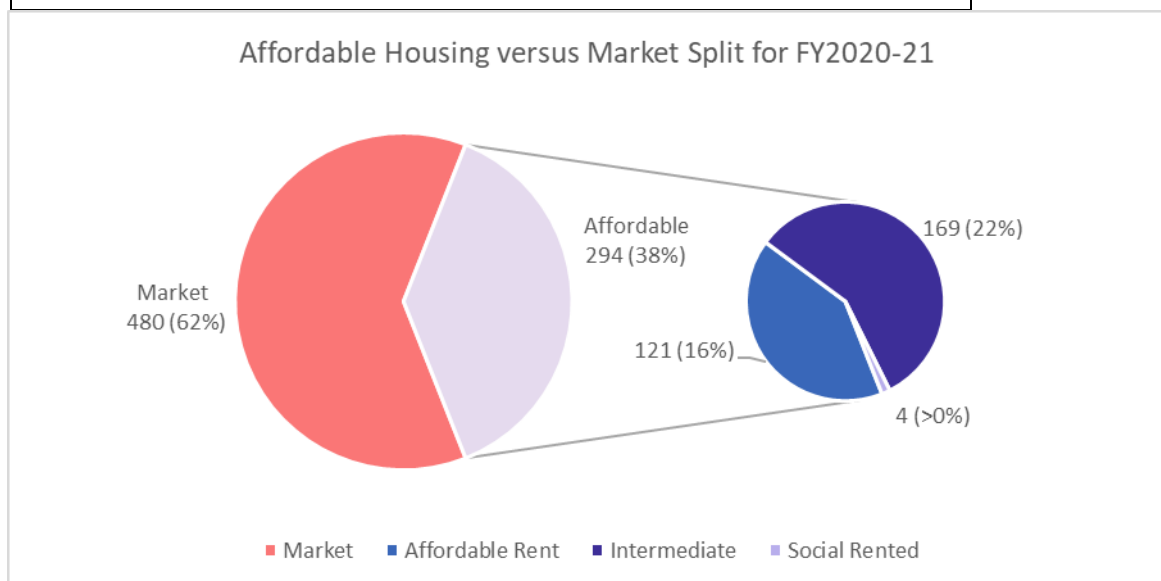


Table 2-5 Affordable Housing Completions, Last 5 Years						
	Tenure	Strategic Output		Policy Output		
			%		Net Units	%
FY2016	Affordable Rent	24	2%		24	3%
	Intermediate	60	6%		59	8%
	Market	910	81%		527	72%
	Social Rented	126	11%		120	16%
	Total	1120			730	
FY2017	Affordable Rent	48	5%		48	10%
	Intermediate	157	18%		157	32%
	Market	626	72%		238	49%
	Social Rented	43	5%		43	9%
	Total	874			486	
FY2018	Affordable Rent	136	10%		136	13%
	Intermediate	175	12%		171	17%
	London Affordable Rent	75	5%		75	7%
	Market	973	68%		575	56%
	Social Rented	70	5%		78	8%
	Total	1429			1035	
FY2019	Affordable Rent	193	14%		193	22%
	Intermediate	86	6%		78	9%
	Market	1077	76%		560	64%
	Social Rented	59	4%		50	6%
	Total	1415			881	
FY2020	Affordable Rent	121	9%		121	16%
	Intermediate	169	12%		169	22%
	Market	1106	79%		480	62%
	Social Rented	4	0%		4	0%
	Total	1400			774	
Last 5 Years						
All tenures	Affordable Rent	522	8%		522	13%
	Intermediate	647	10%		634	16%
	London Affordable Rent	75	1%		75	2%
	Market	4692	75%		2380	61%
	Social Rented	302	5%		295	8%
	Total	6238			3906	
Affordable tenures only	Affordable Rent	522	34%		522	34%
	Intermediate	647	42%		634	42%
	London Affordable Rent	75	5%		75	5%
	Social Rented	302	20%		295	19%
	AH Total	1546			1526	

- 2.36 The table indicates that overall, 1546 units of Affordable Housing have been completed in the borough over the last five years, or 25% of overall supply, with 899 units delivered in either Affordable Rent, London Affordable Rent (LAR) or Social Rent tenures.
- 2.37 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 39% of units completed in affordable tenures over the 5 year period.
- 2.38 In terms of tenure split, the overall proportion of Affordable/LAR/Social Rent to Intermediate tenures was 58% to 42% reflecting effective working of this policy at present.

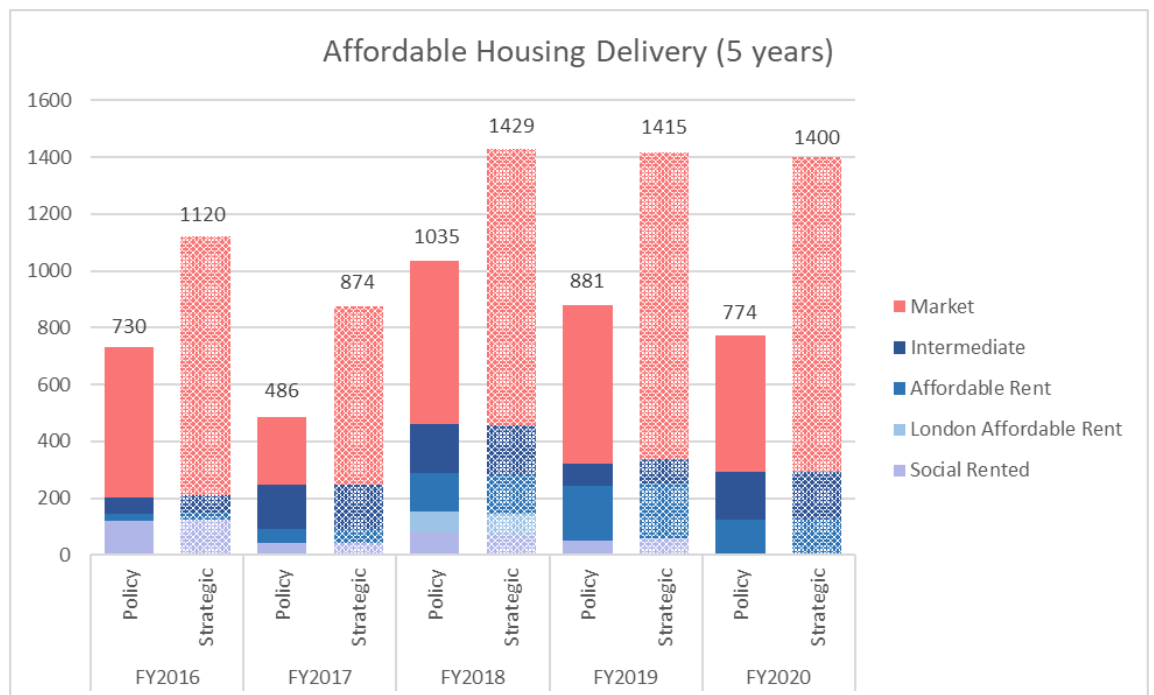


Figure 4 Affordable Housing Delivery (over 5 Years)

Housing Mix

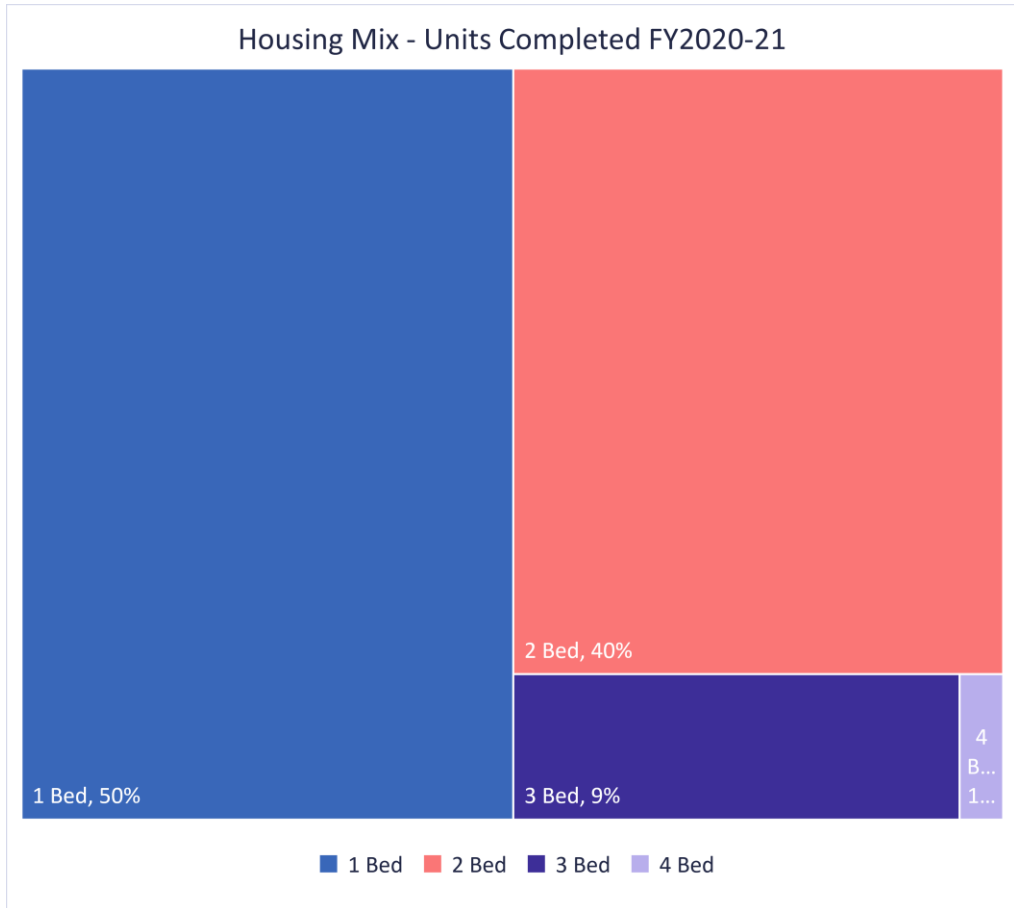
2.39 An important part of meeting the need and demand for housing is to ensure that new housing is of an appropriate size and type. It is also important to ensure that the existing stock is managed appropriately to ensure an appropriate balance of housing size is maintained.

2.40 The table below shows the total units delivered over the last 5 years broken down by unit size (i.e. number of bedrooms).

Table 2-6 Delivery by bedroom size							
Financial Year	Number of Bedrooms						
	1 Bed	2 Bed	3 Bed	4 Bed	5 Bed	6 Bed	8 Bed
FY2016	507 (45%)	421 (37%)	182 (16%)	12 (1%)	2 (>1%)	2 (>1%)	0 (0%)
FY2017	444 (51%)	295 (34%)	69 (8%)	33 (4%)	37 (4%)	0 (0%)	0 (0%)
FY2018	587 (41%)	595 (42%)	214 (15%)	34 (2%)	-2 (>-1%)	1 (>1%)	0 (0%)
FY2019	834 (59%)	508 (36%)	63 (4%)	9 (1%)	1 (>1%)	0 (0%)	0 (0%)
FY2020	701 (50%)	563 (40%)	123 (9%)	12 (1%)	2 (>1%)	0 (0%)	-1 (>-1%)

2.41 The table indicates that there has been an increase in the proportion of 2+ bed units completed in FY2020 compared with the previous year, with 50% of all units having more than 1 bedroom.

Housing Mix - Units Completed FY2020-21



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 137 states that the essential characteristics of Green Belts are their openness and their permanence, whilst paragraph 138 sets out the various functions of Green Belt land 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 147 establishes that inappropriate development is, by definition, harmful and should not be approved except in exceptional circumstances. NPPF Paragraphs 148 requires local planning authorities to ensure that substantial weight is given to any harm to the Green Belt, and paragraphs 149-151 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 implemented (i.e. where approved development has completed on site) on both Green Belt and MOL land over the last 5 financial years⁶.

⁶ 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. All figures are given in hectares (ha).

Table 3-1: Total land take through inappropriate development – applications approved within the previous 5 years		
Designation	Financial Year of permission	Open Space Loss/Gain (ha)
Green Belt	FY2016	0
	FY2017	-0.01
	FY2018	-0.04
	FY2019	-1.29
	FY2020	-0.04
	Total	-1.38
Metropolitan Open Land (MOL)	FY2016	0
	FY2017	-0.01
	FY2018	0
	FY2019	-0.36
	FY2020	-0.89
	Total	-1.26
Total GB and MOL open space loss/gain (five years)		-2.64

Table 3-2: Total land take through inappropriate development – applications implemented within the previous 5 years		
Designation	Financial Year of Completion	Open Space Loss/Gain (ha)
Green Belt	FY2016	-0.15
	FY2017	0
	FY2018	0
	FY2019	-0.04
	FY2020	-0.94
	Total	-1.13
Metropolitan Open Land (MOL)	FY2016	0
	FY2017	-0.08
	FY2018	-0.96
	FY2019	0
	FY2020	0
	Total	-1.04
Total GB and MOL Open Space loss/gain (five years)		-2.17

3.5 Table 3-1 shows that the Council approved applications which would involve the loss of 1.38ha of open land designated as Green Belt, and the loss of 1.26ha open land designated as MOL, through inappropriate development over the past 5 years (2.64ha in total).

3.6 Table 3-2 shows the total loss/gain of open land through schemes which have been completed over the past 5 years. Of these, 1.13ha of Green Belt land and a

further 1.04ha (or approximately 10,400m²) MOL has been lost to inappropriate development within the same period (2.17ha in total).

- 3.7 This includes 2 schemes on Green Belt Land which have been completed in the West of Borough plan area over the past 2 reporting years: Cargo Service Centre (01660/B/P6, completed FY2019) and Segro Park Heathrow (00504/AE/P22, completed FY2020). Between them, these 2 completions accounted for a combined loss of 0.98ha open land to inappropriate development.

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 open space data collected as part of the Open Space Study to support the emerging GWC and WoB Local Plan review⁷, which updates the 2011 baseline for the Local Plan 2015⁸, remains the most up to date published evidence relating to open space provision.

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)⁹. 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.

⁷ Please see LBH Open Space Study (September 2018) and LB Hounslow Local Plan Reviews: Open Spaces Background Paper (September 2020) for more details

⁸ 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)

⁹ 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

3.13 Table 3-4 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

3.14 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

- 3.15 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 quality¹⁰.
- 3.16 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)

¹⁰ 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:

<p>Indicator 1.1: Percentage of total permitted floorspace for main town centres uses inside town centres. Target: 100% (annually)</p> <p>Indicator 1.2: Proportion of objectively-assessed comparison retail need delivered. Target: 100% (by 2021)</p>
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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.

Table 4-1 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.

Table 4-2 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.

Table 4-3 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 As discussed in last year's AMR, 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 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).
- 5.3 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.
- 5.4 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.
- 5.5 In Hounslow, the evolving 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.
- 5.6 This evolving strategic context has therefore 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. The trends underpinning this have been further emphasised by the impact of the Covid-19 pandemic, which has fuelled further the rise of online shopping which in turn has led to further increases in the demand for floorspace to serve the logistics industries.
- 5.7 The result of all this is that monitoring framework from the local plan should be read with these various factors in mind, with the indicators set out below having been set under the time of the local plan framework. The indicators are:
- 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

5.8 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 2020-21.

Table 5-1 Change in employment land 2014-21, and employment land pipeline (Use Classes B2 and B8)

<i>Financial year</i>	<i>B2 change (sqm)</i>	<i>B8 change (sqm)</i>	<i>B2/B8 completed (sqm)</i>
2014-15	799	0	799
2015-16	-30,720	-4292	-35,012
2016-17	1498	-3277	-1779
2017-18		-573	-573
2018-19	3130	-4743	-1613
2019-20	0	0	0
2020-21	-10,796	-7,789	-18,585
TOTAL CHANGE (over period 2014-21, ending in 31/3/21)	-36,089	-20,674	-56,763
Pipeline of supply as at 31/3/21	2,585	11,252	13,837

Source: Hounslow Council monitoring data

5.9 The figures show an ongoing gradual loss of industrial land across the B2 and B8 use classes across most of the financial years covered in the analysis. The overall loss of B2/B8 floorspace during the plan period is now over 5.5ha, so close to the monitoring level set by the local plan. However, as set out above, the strategy in the Council's currently evolving local plan framework is now very different: the aims are the delivery of industrial intensification as part of the regeneration programme in the Great West Corridor, and also the delivery of a significant pool of additional land to serve the logistics industries near to Heathrow, including through the provision of land in the Green Belt. The Council considers that this is necessary in order to deliver the requirements identified in the evidence base relating to employment land, and that exceptional circumstances have been demonstrated to justify the release of Green Belt land for this purpose.

5.10 The monitoring data shows that there is a modest positive pipeline for B2 and B8 industrial land, although this is small in comparison with the needs identified for employment land in the latest Employment Land Review (2020). This study states that there is a gross development demand of 252,784sqm for the period 2019-34.

5.11 Overall, the figures show a loss of 5.6ha during the period covered, with a pipeline showing a potential gain of 1.4ha of land in B2 and B8 uses.

Table 5-2 Change in employment land 2014-21, and employment land pipeline (former 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
2020-21	-20,631
TOTAL CHANGE (over period 2014-20, ending in 31/3/21)	-10,845
Pipeline of supply as at 31/3/21	-63,011

Source: Hounslow Council monitoring data

- 5.12 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 over 60,000 sqm.
- 5.13 Of the schemes which were granted planning permission in 2020-21, all floorspace relates to office uses (formerly B1a, now Egi), except for the following two schemes which are included in the pipeline of supply:
- Planning permission ref 00315/F(B1)/P1 involves a loss of floorspace of 2,808sqm (change of use to warehouse), all of which is research and development floorspace (previously class B1b, now class Egii)
 - Planning permission 01660/B1/P9 involves a loss of 5,031sqm of office floorspace, and a gain of 3,625 of light industrial floorspace (formerly class B1c, now class Egiii). This scheme is the demolition of an existing building and replacement with a new warehouse.

Appendix 1: Draft Local Plan Review Site Allocations informing the Housing Trajectory 2020/21-2034/35*

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	2026-2035						930	747
3	Gillette Factory	Osterley and Spring Grove Ward	2030-2035						48	192
5	West Cross Campus	Osterley and Spring Grove Ward	2025-2035					180	900	720
6	BSS Brentford	Osterley and Spring Grove Ward	2025-2030					24	96	0
7	Profile West Brentford Car Park	Osterley and Spring Grove Ward	2025-2030					6	24	0
11	Homebase Syon Lane	Osterley and Spring Grove Ward	2026-2025						473	0
12	Former Syon Gate Service Station Gillette Corner	Osterley and Spring Grove Ward	2025-2031					4	16	0
13	Harlequin Avenue Sub station	Osterley and Spring Grove Ward	2030-2035						2	8
16	Brentside Park	Osterley and Spring Grove Ward	2022-2026		97	97	98	98	0	0
17	Great West Plaza	Syon Ward	2022-2026		95	95	95	95	0	0
18	Great West House	Syon Ward	2030-2035						14	56
24	Layton Road Warehouses	Brentford Ward	2022-2026		10	10	10	10	0	0
26	Phoenix Business Park	Brentford Ward	2025-2035					26	130	104

28	27 Great West Road	Brentford Ward	2025-2035					50	250	200
29	EMC Tower	Brentford Ward	2030-2035						84	336
30	Vantage West	Brentford Ward	2026-2030					26	104	0
32	Brentford Fountains Leisure Centre	Brentford Ward	2021-2025	75	75	75	75		0	0
33	Esso Filling Station Chiswick Roundabout	Brentford Wards	2025-2030					6	24	0
34	Former Natwest Bank Site, Chiswick	Turnham Green Ward	2025-2030					24	96	0
35	B&Q Chiswick	Turnham Green Ward	2022-2026		67	67	68	68	0	0
37	Gunnorsbury Station Car Park	Turnham Green Ward	2025-2030					24	96	0
39	South Bedfont	Bedfont Ward	2030-2035						182	728
40	Bedfont Gardens	Bedfont Ward	2030-2035						130	520
41	Bedfont Gardens, Land at Southville Crescent	Bedfont Ward	2030-2035						24	96
42	Land at Bedfont Lakes (West) 753 Staines Road, Feltham	Bedfont Ward	2030-2035						28	112
50	Tesco Dukes Green Avenue	Feltham North Ward	2028-2035						90	120
51	Network House Feltham	Feltham North Ward	2030-2035						40	160

52	Lidl Feltham	Feltham North Ward	2030-2035						44	176
53	New Road Triangle	Feltham North Ward	2021-2025	27	27	28	28		0	0
55	Scout Hut Bedfont Lane	Feltham North Ward	2025-2030					6	24	0
56	Land at Glebelands Road	Feltham North Ward	2021-2025	17	17	18	18		0	0
58	Lower Feltham West	Feltham West Ward	2025-2035					13	65	52
59	Tesco Feltham	Feltham West Ward	2025-2030					34	136	0
61	Council Depot, Ashmead Road	Feltham West Ward	2030-2035						10	40
62	Manor Park, Feltham	Feltham West Ward	2030-2035						16	64
63	80-86 High Street Feltham	Feltham West Ward	2030-2035						40	160
64	MOD Feltham	Hanworth Park Ward	2025-2035					137	685	548
65	Leisure West	Hanworth Park Ward	2030-2035						62	248
66	Browells Lane	Hanworth Park Ward	2030-2035							210
67	UPS House	Hanworth Park Ward	2030-2035						34	136
69	Land at 2 High Street Feltham	Hanworth Park Ward	2025-2030					18	72	0

70	Royal Naval Association Club	Hanworth Park Ward	2025-2030					4	16	0
71	Feltham Magistrates Court	Hanworth Park Ward	2025-2030					4	16	0
72	St. Catherine's House and Car Park	Hanworth Park Ward	2025-2030					4	16	0
73	Land at Nene Gardens	Hanworth Ward	2025-2030					8	32	0
74	Hounslow West Station	Heston Central Ward	2025-2030					72	288	0
75	Land to the rear of HCC Sports and Social Club	Heston East Ward	2021-2025	2	2	3	3		0	0
76	Lampton House	Heston East Ward	2025-2030					18	72	0
80	34 Staines Road	Hounslow Heath Ward	2021-2030	14	14	14	13	13	52	0
81	80-82 Staines Road	Hounslow Heath Ward	2025-2030					10	40	0
82	206-210 Hanworth Road	Hounslow Heath Ward	2025-2030					16	64	0
83	Vacant Land Clarence Terrace	Hounslow Heath Ward	2025-2030					6	24	0
84	Hounslow Cavalry Barracks	Hounslow West Ward	2025-2035					100	500	400
85	Builders Yard, 379-389 Staines Road	Hounslow West Ward	2021-2025	5	5	5	5		0	0
86	Former Travis Perkins Staines Road	Hounslow West Ward	2021-2025	2	2	3	3		0	0

87	Euro House, Hounslow	Hounslow Central Ward	2030-2035						16	64
88	Land at Bridge Road Depot	Hounslow Central Ward	2025-2030					2	8	0
89	Land at James Street	Hounslow Central Ward	2021-2025	17	17	18	18		0	0
90	Inwood Business Park	Hounslow Central Ward	2021-2025	8	8	7	7		0	0
91	Hounslow Bus Garage	Hounslow Central Ward	2025-2030					166	664	0
92	Upstage	Hounslow Central Ward	2025-2030					10	40	0
93	Land at Kingsley Road	Hounslow Central Ward	2025-2030					6	24	0
94	Vacant Land R/O Princes Avenue, Gunnersbury	Isleworth Ward	2025-2030					2	8	0
95	Tesco Mogden Lane	Isleworth Ward	2028-2035						146	194
96	Europa House	Isleworth Ward	2021-2025	5	5	5	5		0	0
97	30 Rugby Road	Isleworth Ward	2025-2030					12	48	0
98	Osterley Station Car Park	Osterley and Spring Grove Ward	2025-2030					10	40	0
99	Feltham Coachworks	Osterley and Spring Grove Ward	2025-2030					2	8	0
100	Osterley Park Hotel	Osterley and Spring Grove Ward	2025-2030					16	64	0

101	Brentford Group Practice	Syon Ward	2025-2031					10	50	0
103	West Middlesex Hospital	Syon Ward	2027-2032						200	50
104	Chiswick Health Centre	Turnham Green Ward	2025-2030					6	24	0
105	Chiswick Telephone Exchange	Turnham Green Ward	2021-2025	10	10	10	10		0	0
106	Royal Mail, Chiswick Delivery Office	Turnham Green Ward	2021-2025	8	8	7	7		0	0
107	Sainsbury's Chiswick	Turnham Green Ward	2025-2035					39	195	156
113	69 to 77 Boston Manor Road	Hounslow Central Ward	2030-2035						4	16
114	Royal Mail Delivery Office		2030-2035						28	112
115	Vacant site, Hanworth Road, Hanworth Road, TW3 3UA		2021-2025	22	22	23	23		0	0

*The site capacity figures in this trajectory show the dwellings capacity at sites before the relevant lapse rate specified in paragraph 2.3 of this AMR Report is applied.