

# **London Borough of Hounslow**

## **Hounslow Local Plan 2020-2041 Housing Background Explanatory Note**

**September 2025**

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# 1. Introduction

## Overview

- 1.1 This update to the Housing Background Explanatory Note has been prepared by the London Borough of Hounslow (LBH) to set out the Council's approach to housing delivery in the Local Plan 2020-2041. The paper includes an update to the Local Plan Housing Trajectory in order to inform an updated 5 year housing land supply position.
- 1.2 The Local Plan has been prepared in accordance with the National Planning Policy Framework (NPPF) December 2023 version which it will be assessed against, in accordance with the transitional arrangements set out in part (d) in paragraph 234 of the NPPF December 2024 version. Therefore, unless explicitly mentioned otherwise any reference henceforth to the NPPF is to the December 2023 version of the document.

## Policy framework

- 1.3 The approach taken by Hounslow to meeting its housing target is informed by a wider policy and guidance framework. This reflects:
  - a. The National Planning Policy Framework as well as associated Planning Practice Guidance, particularly the guidance which covers:
    - i. Housing and economic land availability assessment.
    - ii. Housing and economic needs assessment.
    - iii. Housing needs of different groups.
    - iv. Housing supply and delivery.
  - b. The London Plan 2021.
  - c. The adopted Hounslow Local Plan (2015).

## Summary of key points

- 1.4 Key messages discussed in this Background Explanatory Note that are particularly noteworthy in relation to housing provision include:
  - The housing target in the submission version of the emerging Hounslow Local Plan is 28,040 dwellings over the plan period 2020-2041. This is derived from the target of 1,782 dwellings per annum in the London Plan 2021 over the period from 2020 to 2029, and for the remainder of the plan period uses the approach set out in paragraph 4.1.11 of the London

Plan 2021 to derive the housing target, which equated to 1,000 homes per annum as an average over the remaining 12 years.

- In order to gain an as up-to-date as possible understanding of Hounslow's five year housing land supply position, the borough's Housing Trajectory has been updated to take account of completions during monitoring years 2022/23 and 2023/24, and corresponding updates have been made to the pipeline of consented sites, as well as other sources of supply based on the most up to date available evidence, as set out in this paper.
- As per the results in the most recently published Housing Delivery Test (December 2024 version) LBH has recorded a total of 5,920 completed homes from year 1 (2020/21) to year 4 (2023/24) of the plan period, as shown in the updated Housing Trajectory. Including monitoring year 2019/20 (the first year of the London Plan 2021 plan period) which pre-dates Hounslow's plan period, this increases to 7,445 completed homes.
- The updated Housing Trajectory demonstrates a total supply of 34,415 homes over the plan period.
- The updated evidence demonstrates that LBH can demonstrate a 5.53 year housing land supply against its housing requirement, assessed in line with the NPPF December 2023.
- If it were being considered in line with the requirements of the NPPF December 2024 version, the updated evidence shows LBH would be able to demonstrate a 5.26 year housing land supply against its housing requirement.

## 2. Setting the Housing Requirement

### Policy context - National Planning Policy Framework (NPPF)

- 2.1 Under the heading 'The plan-making framework', paragraph 17 of the NPPF explains that there are two main ways of producing strategic planning policies: *"17. The development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area. These strategic policies can be produced in different ways, depending on the issues and opportunities facing each area. They can be contained in:*
- a) joint or individual local plans, produced by authorities working together or independently (and which may also contain non-strategic policies); and/or*
  - b) a spatial development strategy produced by an elected Mayor or combined authority, where plan-making powers have been conferred."*
- 2.2 The London Plan is "a spatial development strategy produced by an elected Mayor" which is within the meaning of paragraph 17(b) of the NPPF.
- 2.3 Paragraph 67 of the NPPF requires strategic policy-making authorities (this includes the Greater London Authority (GLA)) to establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need can be met over the plan period.
- 2.4 As such, the housing target for Hounslow is developed under a two-tier system whereby it is a general requirement for boroughs' development plans to follow and be read together with the London Plan. Together, both the development plans and London Plan should be consistent with national policy.
- 2.5 The adopted London Plan (2021)<sup>1</sup> sets out annual housing supply targets for boroughs from 2019/20-2028/29. These targets were informed through London's strategic housing land availability assessment (SHLAA, 2017). For Hounslow, the ten-year housing target is 17,820 homes delivered between 2019/20 and 2028/29. It is recognised that this figure marks a significant increase from the last London Plan to accommodate the additional demand for homes.

### The Housing Requirement Figure

- 2.6 As set out in Policy H1 of the London Plan 2021, Hounslow's housing target over a 10 year period is 17,820 homes, which annualised up to the year

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<sup>1</sup> [London Plan, 2021](#)

2028/29 is 1,782 homes per annum. Paragraph 4.1.11 of the London Plan states, *“If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.”*

- 2.7 The London SHLAA 2017<sup>2</sup> assessed capacity for large sites over five 5-year periods and Table 10.1 of Appendix A of the Study identified the following notional capacity in Hounslow:
- Phase 1 2017/18 to 2018/19 – 2,322
  - Phase 2 2019/20 to 2023/24 – 11,089
  - Phase 3 2024/5 to 2028/29 – 3,940
  - Phase 4 2029/30 to 2033/34 – 2,436
  - Phase 5 2034/5 to 2040/41 – 153
- 2.8 Paragraph 4.38 of the LSHLAA notes that for a number of local planning authorities, the majority of identified capacity is within phases one to three, which the above figures demonstrate is the case for Hounslow. With Phases 4 and 5 contributing 2,589 homes to the supply of homes in Hounslow, the large majority of the supply informing the capacity based target beyond 2029 has need to be sourced from locally identified capacity assessed in the Site Allocations and Capacity Assessment (SACA) 2024.
- 2.9 Sites assessed in the SACA as suitable, available and achievable which were either 0.25 hectares or larger, or able to accommodate a capacity of 25 or more homes have been allocated for development in the Local Plan (Chapter 12 – Site Allocations). Small sites that were considered by the SACA to be suitable, available and achievable and are below 0.25 hectares in size or assessed as being able to accommodate a capacity of less than 25 homes (except for mixed use part residential sites which have been allocated) have been added to Hounslow’s Brownfield Land Register (BLR).
- 2.10 With regard to small sites, the GLA SHLAA applied a modelled approach to assessing such sites, which could include either: conversion (subdivision) of houses to flats and new build infill development of 10 homes or fewer. The

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<sup>2</sup> [GLA 2017 SHLAA](#)

pan-London model promoted the above forms of development in areas which achieve a PTAL score of between 3-6 or are within 800m of a tube station, rail station or town centre boundary (assuming that 1% of the existing housing stock in areas listed above will increase in density). For Hounslow, this equated to a 10-year modelled figure of 5,700 additional homes on small sites, in addition to a 10-year remaining windfall figure of 1,100, thus providing a combined total of 6,800 homes.

- 2.11 Following the examination of the draft version of the London Plan 2021, the Panel recommended changes to the ten-year housing targets for small sites, which for LBH was reduced from 6,800 to 2,800 homes (280 p.a.) on the grounds that a lower growth rate (of 0.3%) is more probable as it relates closely to evidence regarding the existing position from London boroughs including having regard to historic trends. The London Plan 2021 therefore includes a small sites target of 280 dpa for LBH.
- 2.12 The small sites target figure of 280 homes per year has therefore been used to inform the windfall allowance in the borough's Housing Trajectory. In the previous Housing Trajectory in the submission version of the Local Plan, this was discounted by 50%, in order to allow for any uncertainties associated with this supply and thus avoiding an over-reliance on windfall development to meet housing requirements.
- 2.13 More recently, completions figures for the delivery of homes on small sites in Hounslow have been collated and analysed, and these demonstrate an annualised average of 456 homes have been delivered on small sites from the base date of the London Plan 2021 (1<sup>st</sup> April 2019) to 31<sup>st</sup> March 2024, which is an 878 home surplus over the period. The detailed completions figures for small sites in Hounslow are set out in Appendix 1 of this paper - *Completions on Small Sites of less than 0.25 hectares 2019/20 – 2023/24*.
- 2.14 Having regard to this evidence, the windfall allowance informed by the small sites target for Hounslow is no longer discounted and the figure of 280 homes per annum is applied from 2024/25 to 2040/41. The approach is consistent with paragraph 72 of the NPPF which states that, "*any (windfall) allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends*".
- 2.15 Local authorities in areas which do not have strategic policies contained in a spatial development strategy produced by the Mayor<sup>3</sup> are required to follow

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<sup>3</sup> [NPPF paragraph 17 \(b\)](#)

the approach outlined in paragraph 61 of the NPPF to calculate their housing need figure. Paragraph 61 of the NPPF states, *“strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals”*.

- 2.16 This approach would not be appropriate in London, as it would not apply the locally determined housing need figure assessed by the GLA. Application of the standard method based on the NPPF 2023 would result in a housing need figure of 3,368<sup>4</sup> homes per annum in Hounslow either for the full plan period (2020/21 to 2040/41) or over the period following the 10 year London Plan target (2029/30 to 2040/41). This would be far higher than anticipated by the London Plan 2021 and associated planning documents.
- 2.17 Applying the new standard method figure for Hounslow under the NPPF 2024 version would result in a housing need figure of 2,052<sup>5</sup> homes per annum in Hounslow, however, LBH is not required to use the new standard method as the emerging Local Plan falls under transitional arrangements set out in paragraph 234(d) of the NPPF (December 2024) meaning that the Local Plan will be examined against the NPPF (December 2023 version). Furthermore, the London Plan (2021) is the Spatial Development Strategy covering Hounslow and is therefore the mechanism for setting the housing target in the borough, in accordance with paragraph 17(b) of the NPPF. For both of the reasons, it is therefore not a requirement for the Local Plan to apply the standard method figure as the borough’s housing target.
- 2.18 The strategic policies of the London Plan 2021 do not rely on the “standard method” mentioned in paragraph 61 of the NPPF to determine the minimum number of homes needed in Greater London. Under the heading ‘Delivering the homes Londoners need’, paragraph 1.4.4 of the London Plan states, *“Ten-year housing targets have been established for every borough, alongside Opportunity Area plans for longer-term delivery where the potential for new homes is especially high. Boroughs can rely on these targets when developing their Development Plan Documents and are not required to take account of nationally-derived local-level need figures.”* The standard method figure has therefore not been tested as part of the plan making process for the London Plan and would therefore be inconsistent with the Mayor’s spatial

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<sup>4</sup> Calculated based on the December 2023 version of the NPPF using the standard method with urban area uplift as was applied in the [PPG: Housing and Economic Needs Assessment](#) (16<sup>th</sup> December 2020 version)

<sup>5</sup> Calculated based on the December 2024 version of the NPPF using the standard method as applied in the [PPG: Housing and economic needs assessment](#) (12<sup>th</sup> December 2024 version)

development strategy. As such, to adopt this figure would result in an approach that is inconsistent with London's development plan, and therefore would be an unsustainable level of development.

- 2.19 In addition, the use of the standard method figure would also be inappropriate for Hounslow to use, based on local evidence. The emerging Local Plan is supported by an Integrated Impact Assessment (IIA) which forms part of the evidence base. With regard to housing growth, the IIA tested five scenarios over the emerging plan period (2020-2041) including two high growth scenarios. High growth scenario H1 applied the NPPF 2023 standard method figure (3,368 homes) over the full plan period deriving a need for 66,108 homes and high growth scenario H2 applied the London Plan target to 2028/29 followed by the NPPF 2023 standard method figure (3,368 homes) over the remainder of the plan period deriving a need for a total 53,813 homes.
- 2.20 Paragraph 5.2.4.2 of the IIA states that higher growth options, *"would need to extend housing development into the established Green Belt which has implications for the IIA themes of air quality and noise, biodiversity and green infrastructure, climate change, community wellbeing, cultural heritage and landscape, economy and employment, sustainable land use and soil resources, and water quality and water resources."* As such is it considered this would be likely to undermine the delivery of the level of growth which leads to high quality residential or mixed use urban environments. This is because the scale of growth facilitated under these options would be likely to require growth on unsuitable land, and potentially at high densities. The approach would risk taking forward land that has been considered unsuitable for development, undermining sustainable development in the borough.
- 2.21 Furthermore, the IIA finds that high growth scenarios H1 and H2 would deliver a level of growth that would require sites being taken forward for development in locations which have significant environmental constraints, biodiversity sensitivities and/or air and noise quality issues. The IIA also finds that the higher growth options would require the loss of significant areas of open land, reducing the capacity of the area to regulate water and soil quality, support climate change adaptation and facilitate flood risk management.
- 2.22 The demand for land for development would also potentially limit the scope to deliver comprehensive green infrastructure provision alongside new development or facilitate the delivery of high-quality neighbourhoods which meet the diverse needs of residents. Finally, due to the higher growth

options requiring the release of significant areas of good and moderate performing Green Belt (as well as the need for an intensification of land uses), these options have additional potential to lead to significant impacts on landscape and townscape character in the borough.

- 2.23 In order to deliver its housing requirement, LBH has adopted the London Plan's 1,782 dwellings per annum target from 2020 up to 2029 as its housing requirement (and proposes to add previous under delivery against the 1,782 home target in 2019/20 to this) and thereafter, follows the approach set out in paragraph 4.1.11 of the London Plan to set its housing target for the remainder of the plan period up to 2041. The strategic housing target in the submission version of the Local Plan is therefore 28,040 (rounded) consisting of 16,038 homes from 2020/21 to 2028/29 and 12,000 homes from 2029/30 to 2040/41.
- 2.24 Consistent with the London Plan 2021, the housing target in the submission version of the Local Plan and the supply of homes in this update to the Housing Trajectory both represent a significant step-change on past delivery rates in the borough, and contribute towards meeting the government's objective of significantly boosting the supply of homes, as set out in paragraph 60 of the NPPF.

#### *Setting the Housing Requirement: Summary*

- 2.25 In determining the most appropriate approach for setting the housing target, regard has been had to national policy and guidance (the NPPF and PPG), and the London Plan 2021. This is in order to apply the most appropriate strategy which is compliant with national policy and in general conformity with the adopted London Plan 2021.
- 2.26 The use of the "standard method" mentioned in paragraph 61 of the NPPF is not considered appropriate to determine the minimum number of homes needed in Greater London, particularly given the London Plan's direction at paragraph 1.4.4 that boroughs are "*not required to take account of nationally-derived local-level need figures.*" The standard method housing need figure of 3,368 homes per annum in Hounslow is far higher than anticipated by the London Plan 2021. To adopt the standard method figure in Hounslow would therefore be inconsistent with the Mayor's spatial development strategy, representing an unsustainable level of development.
- 2.27 At a borough level, the high growth scenarios which tested the standard method figure in the IIA found that the scale of growth would be likely to require development on unsuitable land, and potentially at high densities,

thus undermining high quality sustainable development. In addition, the scenarios tested using the standard method figure would result in development in locations which have significant heritage and environmental constraints. Furthermore, significant areas of open land would be lost, reducing capacity to regulate water and soil quality, support climate change adaptation and facilitate flood risk management.

- 2.28 Given all of the above, it is considered that the approach that LBH has taken to setting the Local Plan housing target is the most appropriate strategy, is consistent with national policy and in general conformity with the London Plan.

## 3. Site Assessment and Capacity

### Policy context

- 3.1 National policy states that policy-making authorities should prepare a strategic housing land availability assessment to have a clear understanding of the land available in their area.
- 3.2 Paragraph 69 of the NPPF states that planning policies should identify a supply of:
- “a) specific, deliverable sites for years one to five of the plan period; and*
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”*
- 3.3 The NPPF recognises the importance of small and medium sized sites in contributing to the housing requirement of an area, in part due to their relatively quick build-out. To promote a good mix of sites, the NPPF stipulates that (para. 70a) *“local planning authorities should identify through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirements on sites no larger than one hectare; unless it can be shown through the preparation of relevant policies that there are strong reasons why this 10% target cannot be achieved”*.
- 3.4 National policy also emphasises that local planning authorities should support the development of windfall sites.
- 3.5 Of relevance to LB Hounslow, Heathrow and the Great West Corridor have been earmarked as ‘Opportunity Areas’ in the London Plan 2021<sup>6</sup>. The Heathrow Opportunity Area is shared with the London Borough of Hillingdon and the Great West Corridor Opportunity Area is entirely within LBH. Policy SD1 of the London Plan 2021 requires boroughs to *“clearly set out how they will encourage and deliver the growth potential of Opportunity Areas”*, in addition to *“supporting development which creates employment opportunities and housing choice for Londoners”*.
- 3.6 Policy SD1 set out indicative figures for 13,000 homes and 10,000 jobs in the Heathrow Opportunity Area, and 7,500 homes and 14,000 jobs in the Great West Corridor Opportunity Area.

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<sup>6</sup> [https://www.london.gov.uk/sites/default/files/draft\\_london\\_plan\\_-\\_consolidated\\_changes\\_version\\_-\\_clean\\_july\\_2019.pdf](https://www.london.gov.uk/sites/default/files/draft_london_plan_-_consolidated_changes_version_-_clean_july_2019.pdf) (accessed November 2019)

## Local context – identification of sites

- 3.7 In line with the London Plan’s ‘Good Growth’ policies, LBH adopts a realistic approach to identifying potential sites for development which considers availability, suitability, potential constraints and the likely economic viability of land within the borough.
- 3.8 The council has produced a Site Allocations and Capacity Assessment (SACA)(2024) in order to develop a clear understanding of capacity sites in the borough. The study was undertaken in the five stages, as outlined in PPG<sup>7</sup>. These include:
- STAGE 1: Site/broad location identification (determination of assessment area, desktop review, call for sites, sites/broad location survey)
  - STAGE 2: Site/broad location assessment (estimation of development potential, suitability, availability, achievability (including viability) and overcoming constraints)
  - STAGE 3: Windfall assessment (determination of housing and economic development potential)
  - STAGE 4: Assessment review (review of assessment and preparation of draft Trajectory)
  - STAGE 5: Final evidence base
- 3.9 Where appropriate, the site capacity assessment has taken account of Policy H2 (B.3) of the London Plan, which states that *“Boroughs should identify and allocate small sites for residential development”*. LBH has adopted an inclusive process which was not limited by site size in the Stage One assessment and thus allowed for as many opportunities for development to be identified as possible. Care was also taken to avoid double counting sites where detailed planning permission had been granted which were already in the development pipeline.
- 3.10 Stage Two ‘Suitability’ considered the appropriateness of sites, with regard to their Public Transport Accessibility Level (PTAL) and proximity to Town Centres and Employment Areas and planning constraints, such as Green Belt and employment designations. The ‘Availability’ stage involved determining ownership of sites through a Land Registry Ownership Parcel Assessment and, where appropriate, contacting the owners of sites to determine if they

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<sup>7</sup> Planning Practice Guidance, Housing and Economic Land Availability Assessment, Paragraph: 005 Reference ID: 3-005-20190722

were available for development, and if so, when. Finally, achievability of sites was determined at a high level using the results of the Hounslow Viability Assessment<sup>8</sup> which tests viability across a range of notional development scenarios and, when applied to the sites in the Site Allocations and Capacity Assessment, shows these to be viable and thus achievable. Stage Two also addressed potential sites where the future delivery of infrastructure may overcome current constraints to development e.g. where transport infrastructure may improve overall accessibility of a site in the future. These criteria were used to inform phasing periods for delivery of the identified sites.

- 3.11 A total of 480 sites were assessed through the 2024 version of the assessment, of which 163 met all of the suitability, availability and achievability tests and were taken forward to capacity assessment. Of these, 96 sites have been allocated and 67 were small sites that are included on the Brownfield Land Register.
- 3.12 The potential quantum of development that might be accommodated on any of the identified sites was tested through a design-led approach. This follows the 'density by design' approach advocated through Policy D3(A) of the London Plan 2021, stating that: *"all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations"* and where development should respond *"to a site's context and capacity for growth"*. As such, the site capacity assessments were informed by the Hounslow Character and Context Study (2014)<sup>9</sup> and superseding Hounslow Sustainability, Character and Design Codes SPD (2024)<sup>10</sup>.
- 3.13 When assessing the development capacity of a site, LBH developed and utilised a capacity assessment tool<sup>11</sup>. Consideration was given to the prevailing character, average plot ratio and building height of the immediate area, as well as regard for whether an area was identified for conservation, enhancement or transformation in the Character and Context Study, and potential typology of new building that would be appropriate. Comments were also received from the Council's urban design officers, and where appropriate, planning officers, as to proposed parameters for each site within the tool. Consideration of the criteria informed the potential capacity of each site. This method follows the design-led approach of the London

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<sup>8</sup> [Hounslow Whole Plan Viability Assessment \(2024\)](#)

<sup>9</sup> London Borough of Hounslow, August 2014, Urban Context and Character Study, Final

<sup>10</sup> [Hounslow Character Sustainability and Design Codes Supplementary Planning Document \(2024\)](#)

<sup>11</sup> An example copy of the tool can be found in Appendix 3 of the SACA (2024)

Plan 2021, which notes in Policy D3 (A) that *“the approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity”*.

- 3.14 In addition to the above, LBH has more recently co-developed 3D modelling software that enables 3D visualisations to be drawn to test capacities on potential sites. This software has enabled us to test the assumptions of existing site capacity assessments and also to assess sites that were more recently brought to LBH’s attention at the Regulation 18 consultation stage, once the software became available.
- 3.15 The Tall Buildings Study is a part of the evidence base supporting the emerging Local Plan. The Study provides a spatial overview of the borough, including an analysis of existing building heights and explores the potential for tall buildings through a review of sensitivities and potential opportunities for growth. It provides a definition of a tall building for different parts of the borough (informing the definition in Policy CC3) and makes recommendations on appropriate locations for tall buildings and the potential height of these tall buildings for areas of the borough outside the Great West Corridor (where tall building appropriate areas and potential heights are supported by the Great West Corridor Masterplan). The SACA has had regard to the appropriate heights recommended within the Tall Buildings Study.
- 3.16 Suitable, available and achievable sites in the SACA 2024 assessed to have a capacity of at least 25 homes through the approach described above have been allocated in the emerging Local Plan.
- 3.17 Where the design approach resulted in a development potential of less than 25 units on any one site and were not mixed use sites, or where a site was smaller than 0.25 hectares (and thus considered a ‘small site’ in line with the London Plan 2021), and the site was not part of a masterplan, the site was added to the Brownfield Land Register in order to recognise it as having potential to support meeting housing need but not at the strategic level of site allocations. It also recognises that a range of efforts were employed by LBH to identify as many small site opportunities as possible.

### **Housing Capacity: 2020-2041**

- 3.18 Site allocations, council owned land, planning permissions and planning applications have been identified and reviewed to determine the supply of deliverable and developable sites for the Local Plan.

- 3.19 The overall future housing delivery supply has been broken down into the following components, which are reflected in the updated Housing Trajectory.

### **Housing Completions 2020/21-2023/24**

- 3.20 The net housing completions in Hounslow between 01/04/2020 and 31/03/2024 as recorded in the government's Housing Delivery Test: 2023 measurement published in December 2024<sup>12</sup> have been accounted for in the Housing Trajectory. These include 1,719 net homes in year 1 of the Trajectory (2020/2021); 1,737 completed homes in year 2 of the Trajectory (2021/22); 1,238 completed homes in year 3 of the Trajectory (2022/2023), and 1,226 completed homes in year 4 of the Trajectory (2023/2024). This is a total of 5,920 completed homes from years 1 to 4 of the Trajectory against our annual target of 1,782 homes set out in the London Plan 2021. It should also be noted that to account for previous under delivery against Hounslow's London Plan set housing target in 2019/20, an additional 257 homes have been added on top of Hounslow's housing target in year 1 of the Trajectory.

### **Approved Planning Permissions in the Pipeline**

- 3.21 The pipeline consists of all approved planning applications that are in the pipeline and not yet completed at 31/03/2024, after years 1 to 4 of the Trajectory. The pipeline has been updated and contributes 5,601 homes to the overall housing capacity accounted for in the revised Housing Trajectory. Of the total pipeline permissions, 1,166 homes are located on small sites of below 0.25 hectares in size, as defined in the London Plan 2021. A table of the pipeline sites included in the Trajectory can be found at Appendix 2 of this paper - *Pipeline Sites with Planning Permission at Base Date of Updated Housing Trajectory (1st April 2024)*.

### **Site Allocations**

- 3.22 The collective capacity derived from site allocations in the emerging Local Plan 2020-2041 has been accounted for in the updated Housing Trajectory. The Trajectory includes a supply of 17,950 homes on site allocations.
- 3.23 Where planning permissions have come forward which fall under a site allocation, the capacity from the site allocation has been counted towards the supply, and the consented capacity has not been used, in order to avoid double counting. This is also to reflect that an allocation is LBH's preferred

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<sup>12</sup> [Housing Delivery Test Measurement: 2023](#)

strategy for a site, and should the planning permission lapse, the allocation requirements would still apply.

- 3.24 It is important to note that this approach has resulted in a much more conservative estimate of the housing supply that site allocations will contribute. This is because the minimum development quantum figures for site allocations are used in the Trajectory, however, where consents have been granted on the allocation sites, the number of homes granted in the consents have, in most cases, significantly exceeded their allocation figures.
- 3.25 Appendix 3 of this paper - *Capacity on Allocations Compared with Equivalent Permissions*, includes a table comparing the minimum development quantum figures in proposed site allocations with the number of homes consented, where applicable. As demonstrated in Appendix 3, a total of ten separate proposed site allocations which have received planning permission have collectively come forward for +1,615 homes above their collective minimum development quantum figure.

### **Windfall Allowance**

- 3.26 The approach to windfall in the SACA 2024 is derived from the Small Sites target in the London Plan 2021.
- 3.27 The small sites figure for Hounslow in the London Plan was originally set at 680 dpa. This was based on a modelled approach. The adopted version of the London Plan 2021 reduced this to 280 dpa.
- 3.28 This figure has also been used to inform the windfall allowance in the updated Housing Trajectory. In total, the Trajectory includes an allowance for 4,760 units to come forward through windfall from 2024/25-2040/41.

### **Brownfield Land Register**

- 3.29 The updated Housing Trajectory includes small sites which are on the Brownfield Land Register with an identified capacity to deliver approximately 184 homes. This figure excludes sites that form part of the pipeline of permissions, in order to avoid double counting. Sites on the register are projected to be delivered within years 2024/2025 to 2028/2029 of the plan period. Phasing of these is thus split equally over this period, at 36/37 units per annum.
- 3.30 The proposed Brownfield Land Register sites are considered to be closely related to the types of sites anticipated to come forward as part of the modelled approach adopted by the London Plan. Combined with the

windfall allowance, the Brownfield Land Register sites give a total delivery of 4,944 homes over the plan period.

**Lapse Rate**

- 3.31 In the update to the Housing Trajectory, a lapse rate of 3% has been applied to consented sites in the pipeline that have not yet commenced, and is based on the trend lapse rate for permitted sites over the most recently monitored 10 year period for lapsed consents (2014-2023). A lapse rate is not applied to sites with consent that are already under construction, given that such sites will have commenced within the period required, and as such cannot lapse.
- 3.32 Furthermore, the updated Housing Trajectory also does not apply a lapse rate to site allocations. As explained in paragraph 3.24 of this paper, based on site allocations that have come forward during the plan period to date, the number of homes permitted on the sites is overall, significantly above the minimum development quantum figures set out in the corresponding site allocations. As such it is not appropriate to apply a lapse rate to site allocations.

**Overview**

- 3.33 The updated Housing Trajectory includes sites from all of the sources set out above and shows that a total of 34,415 homes will be delivered over the plan period.
- 3.34 A full breakdown of housing supply figures accounted for in the updated Housing Trajectory, is set out in Table 1 below:

**Table 1: Expected Delivery of Housing in Local Plan Housing Trajectory Update**

<b>Component of Supply</b>	<b>Capacity (Number of Homes)</b>
Homes completed during monitoring years 2020-2021 and 2023-2024	5,920
Pipeline sites with planning approval	5,601
Site allocations	17,950

Other small sites on the Brownfield Land Register	184
Windfall allowance	4,760
<b>TOTAL CAPACITY</b>	<b>34,415</b>

## 4. Five Year Housing Land Supply Update

### Introduction

- 4.1 This section sets out an assessment of Hounslow Council's current five-year housing land supply (5YHLS) position over the 2024 – 2029 period.

### Policy Context

- 4.2 Paragraph 69 of the NPPF sets a requirement that, *“Planning policies should identify a supply of: a) specific, deliverable sites for five years following the intended date of adoption; and b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.”*
- 4.3 Appendix 2 of the NPPF provides the definition for a deliverable site:  
*To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*
- 4.4 The NPPF published in December 2023 removed the requirement for a 5% buffer to ensure choice and competition in the market for land. The NPPF 2023 does however maintain the requirement for a 20% buffer in cases where there has been significant under delivery of housing over the previous three years (Paragraph 77), measured against the Housing Delivery Test.
- 4.5 The NPPF also states that, where a plan-making authority cannot demonstrate a sufficient five-year supply (including any relevant buffer), the presumption in favour of sustainable development will apply, as set out in paragraph 11d and corresponding footnote 8. National planning practice guidance ('PPG') sets out that for the purposes of calculating the five-year housing land supply, housing completions should include all new build dwellings, conversions, changes of use, and redevelopments, which should be presented as a net figure to offset any demolitions.

4.6 This Five-Year Housing Land Supply Statement presents an overview of the five-year housing land supply position of LB Hounslow in accordance with the requirements of the NPPF and the guidance set out in national planning practice guidance. The five-year housing land supply position is assessed using planning status information that is base-dated at 1st April 2024. This means that site information in relation to planning permission status is considered as it was on 1st April 2024.

### **Calculating the Five Year Housing Land Supply**

#### ***Housing Requirement***

4.7 The national Planning Practice Guidance (para. 005) (PPG) advises that the housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5 year housing land supply figure where:

- the plan was adopted in the last 5 years, or
- the strategic housing policies have been reviewed within the last 5 years and found not to need updating.

4.8 In other circumstances the 5 year housing land supply will be measured against the area's local housing need calculated using the standard method. The PPG also advises that where there is more than one strategic housing requirement for an area (as is the case in London where housing supply targets are established through the London Plan), primacy is given to the most recently adopted policies for the purpose of this calculation.

4.9 The most recent adopted Local Plan which established a local housing requirement in Hounslow is the Hounslow Local Plan 2015-2030, which was adopted in September 2015. As the Local Plan 2015-2030 was adopted more than five years ago, it is no longer deemed current for the purpose of this exercise. In addition, the target contained in the Local Plan 2015-2030 has been superseded by those contained in the 2021 London Plan. Policy H1 of the London Plan establishes the housing requirement for Hounslow, setting a delivery target of 17,820 net additional homes to be delivered over a 10 year period (2019-2031), which annualised is 1,782 homes. The annualised housing requirement figure is multiplied by 5, to establish the overall base target for the next five years.

4.10 Although adopted in March 2021, the London Plan targets apply in part retrospectively as they are intended to be monitored from 1st April 2019.

4.11 The period that is measured in the five year housing land supply should follow on from the last reporting year from which completion figures have

been confirmed. Ordinarily these completion figures are applied from the Government’s published Housing Delivery Test (HDT) results, the latest of which were published in December 2024 and cover activity up to and including 2022/23 only.

- 4.12 To reach a more current understanding of the supply position it has been deemed appropriate to utilise more recent completion figures for 2023/24 submitted by the GLA to Government as part of the Housing Flow Reconciliation (HFR) return. Typically, the HFR forms the basis of the HDT results, and differences tend to be negligible. Utilising reported completion data for 2023/24, a revised ‘starting year’ of 2024/25 has been employed for the purpose of establishing this five year supply position.

***Shortfall/Surplus***

- 4.13 In calculating the cumulative housing requirement figure for the next 5 years, alongside the baseline figure, it is also necessary to add any shortfall or backlog arising from previous under-delivery against targets in previous years covered by the relevant Plan (in this case, the London Plan). Following the ‘Sedgefield approach’ it is intended that the full extent of any shortfall is carried forward and added to the established requirement for the next 5 years.
- 4.14 Any deficit is to be calculated from the base date of the adopted plan, which is set at 2019/20. At the time of writing, completions data is available up to and including 2023/24, and therefore any shortfall is determined examining activity over 5 reported years as detailed in Table 2 below. As noted above the completion figures given for 2019/20 to 2022/23 are taken from the most recently published HDT results, with the figure for 2023/24 being sourced from Hounslow Council’s HFR return.

**Table 2 – Net Housing Completions by Monitoring Year**

<b>Monitoring Year</b>	<b>Target</b>	<b>Recorded Completions</b>	<b>Surplus/Deficit against Target</b>
2019-20	1,782	1,525	-257
2020-21	1,782	1,719	-63
2021-22	1,782	1,737	-45
2022-23	1,782	1,238	-544
2023-24	1,782	1,226	-556
Cumulative Total	8,910	7,445	-1,465

***Buffer***

- 4.15 To ensure that there is a reasonable prospect of achieving the planned level of housing supply it is necessary to add an appropriate buffer to the housing requirement for the first 5 years including any shortfall. The requisite buffers and their application has continued to evolve between each iteration of the NPPF.
- 4.16 The NPPF 2023 does not include a requirement for a 5% buffer in any circumstances. The Hounslow Local Plan 2020-2041 is being examined under transitional arrangements meaning it will be assessed against the NPPF December 2023 and therefore no buffer is applied to the 5 year housing land supply calculation for the purposes of the Local Plan.
- 4.17 The NPPF 2023 does however include the requirement for a 20% buffer in cases where there has been significant under delivery of housing over the previous three years (Paragraph 77), measured against the Housing Delivery Test. However, the Housing Delivery Test results published in December 2024 confirmed that the Hounslow measurement is 108%. Consequently, the 20% buffer for significant previous under-delivery is not applicable to Hounslow and no buffer is applied.
- 4.18 The NPPF 2024 reintroduced the requirement for a 5% buffer. In order to take a pragmatic approach, this paper sets out two 5 year housing land supply scenarios:
- a. NPPF 2023 5YHLS calculation with no buffer applied
  - b. NPPF 2024 5YHLS calculation with the requisite 5% buffer applied

### ***Supply***

- 4.19 The supply side of the calculation essentially involves determining what supply, and associated level of capacity, is anticipated to be delivered over the next 5 years. This can be informed by a range of sources including amongst other things the latest pipeline data of planning permissions, and the estimated yield from allocations and windfall. The exercise needs to demonstrate there are sufficient specific deliverable sites in Hounslow to provide a minimum of five years' worth of housing when measured against the housing requirement.
- 4.20 For the purpose of this 5 year housing land supply position statement, the 5 year period covered is 2024/25 – 2028/29 (or 1st April 2024 until 31st March 2029). As such, the base date of this calculation is 1<sup>st</sup> April 2024. For future calculations this window of time will continue to be rolled forward to follow on from the last period of reporting on completions.

### **Components of Supply**

- 4.21 The updated Housing Trajectory supporting this background paper is set out in Figure 1 on page 31. This shows the breakdown of anticipated completions on an annual basis over the life of the plan for Hounslow. The Trajectory includes existing commitments, deliverable and developable sites identified through the Site Assessment and Capacity work, and an element of windfall.
- 4.22 Whilst the Housing Trajectory covers the entire plan period of the Local Plan (2020-2041), as stated in paragraph 4.11, the five year housing land supply is required to look ahead over a period of 5 years following on from the latest recording completions figure. As such, within the Housing Trajectory, the 5 year period covered is 2024/25 – 2028/29 (or 1st April 2024 until 31st March 2029). The specific components that comprise the five year housing land supply are summarised in Table 3 below.

**Table 3 - Components of 5 Year Housing Land Supply:**

<b>Source of Supply</b>	<b>Contribution to Supply (no. of Homes)</b>
Phased pipeline permissions	4,674
Unphased pipeline permissions	927
Site allocations: Great West Corridor	2,163
Site allocations: West of Borough	1,106
Site allocations: Rest of Borough	1,013
Windfall allowance/small sites	1,400
Brownfield Land Register small sites	184
<b>Total</b>	<b>11,467</b>

- 4.23 Table 4 below provides a breakdown of how the five-year housing requirement and supply position has been calculated for the Local Plan 2020-2041, in accordance with the NPPF 2023.

**Table 4: Five-year housing land supply position (calculated as per NPPF December 2023) – 1 April 2024 – 31 March 2029**

<b>Stage</b>	<b>Calculation</b>	<b>Category</b>	<b>Figure</b>
A		Annual Housing Requirement	1,782
B	A x 5	(London) Plan Period Completions Required to date (2019/20 – 2023/24)	8,910
C		Plan Period Completions delivered to date (2019/20 – 2023/24)	7,445
D	B - C	Accrued deficit (2019/20 – 2023/24)	1,465

Stage	Calculation	Category	Figure
E	$D \div 5$	Deficit annualised over 5 year period 1 April 2024 – 31 March 2029 (Sedgefield approach)	293
F	$A + E$	Annual housing requirement taking account of deficit	2,075
G	$F \times 5$	Housing Requirement over 5 year period: 1 April 2024 – 31 March 2029	10,375
H		Housing Supply over 5 year period: 1 April 2024 – 31 March 2029	11,467
<b>I</b>	<b><math>(H \div G) \times 5</math></b>	<b>Five-year housing land supply</b>	<b>5.53</b>

- 4.24 The borough's supply of deliverable sites for the five year period 1 April 2024 – 31 March 2029 is 11,467 homes. LBH is therefore able to demonstrate a five year housing land supply (5.53 years) against its London Plan derived housing target of 1,782 homes per year, with deficit against the housing requirement from the base date of the plan period added.
- 4.25 The borough's supply of 5.53 years' housing therefore also exceeds the four years' supply of housing that Hounslow is required to demonstrate, in accordance with the NPPF (2023).
- 4.26 If assessed in accordance with the NPPF 2024, after calculating the housing requirement over 5 years including previous under delivery against the requirement from the base date of the London Plan, it would then be necessary to apply a 5% buffer on top of this.
- 4.27 Table 5 below provides a breakdown of how the five-year housing land supply position would be calculated in accordance with the NPPF 2024:

**Table 5: Five-year housing land supply position (calculated as per NPPF December 2024) – 1 April 2024 – 31 March 2029**

Stage	Calculation	Category	Figure
A		Annual Housing Requirement	1,782
B	$A \times 5$	(London) Plan Period Completions Required to date (2019/20 – 2023/24)	8,910
C		Plan Period Completions delivered to date (2019/20 – 2023/24)	7,445
D	$B - C$	Accrued deficit (2019/20 – 2023/24)	1,465

E	$D \div 5$	Deficit annualised over 5 year period 1 April 2024 – 31 March 2029 (Sedgefield approach)	293
F	$A + E$	Annual housing requirement taking account of deficit	2,075
G	$F \times 5$	Housing Requirement over 5 year period: 1 April 2024 – 31 March 2029	10,375
H	$G \times 1.05$	Plus 5% buffer	10,894
I		Housing Supply over 5 year period: 1 April 2024 – 31 March 2029	11,467
<b>J</b>	<b><math>(I \div H) \times 5</math></b>	<b>Five-year housing land supply</b>	<b>5.26</b>

4.28 Having regard to the above calculation, if assessed against the requirements of the NPPF December 2024 LBH would be able to demonstrate a five year housing land supply (5.26 years) against its London Plan derived housing target.

# 5. Housing Trajectory

## Introduction

- 5.1 This update to the Local Plan Housing Trajectory takes account of past completions compared against the London Plan derived housing target of 1,782 dwellings per annum from 1<sup>st</sup> April 2019 up to 31<sup>st</sup> March 2024. The Trajectory then projects forward from 1<sup>st</sup> April 2024.
- 5.2 To ensure the supply position is as up-to-date as possible, a number of the Trajectory's other inputs have been updated, as set out in section 3 of this paper. This includes:
- the pipeline of sites with consent;
  - the small sites windfall allowance;
  - the lapse rate applied to sites with permission not yet commenced;
  - the removal of the lapse rate from site allocations;
  - updates to the phasing of site allocations; and
  - updated capacity inputs for the proposed site allocation at GlaxoSmithKline.

## Period Covered

- 5.3 The updated Housing Trajectory covers the same period as the Local Plan 2020-2041, which expressed in monitoring years is 2020/21 to 2040/41. To account for previous under delivery in 2019/20 against Hounslow's London Plan set housing target, an additional 257 homes have been added to Hounslow's housing target in year 1 of the Trajectory, meaning the borough's housing requirement used in the Trajectory for the year 2020/21 is 2,039 rather than 1,782. The housing requirement then reverts to 1,782 in year 2 of the Trajectory (2021/22).
- 5.4 The period of the Trajectory between years 2020/21 and 2023/24 is now informed by historical completion datasets. The 17 year period from 2024/25 to 2040/41 represents future years and is determined based on forecasting/projections.

## Housing Target

- 5.5 The approach to setting Hounslow's housing target is explained in section 2 of this paper. Within the Trajectory the target is shown both at an individual annual level and as a cumulative requirement.

## **Supply/Delivery Inputs**

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

### **Accounting for past delivery**

- 5.7 The Trajectory records any deficit or surplus already accumulated since 2019/20, which aligns with the start of the London Plan target period. This involves establishing any difference in completion activity when measured against the London Plan target from its base date (year 2019/20) to the year with the most recently available housing completions data (currently 2023/24).

### **Future delivery**

- 5.8 For 'future years', which for this iteration of the Trajectory covers the period from 2024/25 until 2040/41, annual delivery figures are estimated for each year. Future delivery capacity is broken down into separate components of delivery which are explained in detail in paragraphs 3.20 to 3.34 in section 3 of this paper, and reflected in the Housing Trajectory. Each component is exclusive, to avoid double counting of capacity.

### **Assigning capacity to future years**

- 5.9 Having determined the capacity inputs, this capacity has been assigned to future years covered by the Trajectory, including the next 5 forecast years of the plan period (the 5 year housing land supply), based on the anticipated timing of housing completions.
- 5.10 For the next five forecast years (2024/25 – 2028/29), only sites which qualify as 'deliverable' have been assigned to this period. The inputs here in relation to future delivery are identical to those informing the 5YHLS calculation, and a large proportion of the capacity derives from the pipeline of permissions established already. Site capacity assigned to years 6-17 (2029/30 – 2040/41) of the Trajectory has been tested to meet the definition of 'developable' sites as defined in the NPPF as follows: *'To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.'*
- 5.11 To help inform the phasing of sites, where available, site specific information including phasing plans or information provided by developers has been taken account of. Where such information is not available, as a starting point, phasing information has been based on Lichfields Start to Finish

2024<sup>13</sup> which includes average lead-in times and build-out rates based on examples of site delivery.

5.12 Tables 6, 7 and 8 below show the thresholds included in Lichfields Start to Finish based on a range of different site sizes. Where appropriate, some adjustments have been made to the application of these rates within the Trajectory to reflect a London context. This information has also been applied where planning applications have been submitted, but not yet determined.

5.13 As such, the lead in times and build out rates applied vary depending on site specific factors.

**Table 6: Start to Finish Lead in Times - Validation to Planning Consent**

<b>Site Size</b>	<b>Validation to Outline Consent (years)</b>	<b>Validation/ Outline to Detailed Consent (years)</b>	<b>Total from Validation to Full Consent if applying for Outline first (years)</b>
50-99	Information not available	1.5	n/a
100-499	1.2	1.6	2.8
500-999	1.8	1.6	3.4
1,000-1,499	1.3	3.6	4.9
1,500-1,999	3.1	1.9	5
2,000+	2.8	2.3	5.1

**Table 7: Start to Finish Lead in Times - Planning Consent to Delivery**

<b>Site Size</b>	<b>Planning Consent to Delivery Period (years)</b>
50-99	2.3
100-499	3.2
500-999	1.5
1,000-1,499	1.3
1,500-1,999	1.6
2,000+	1.6

<sup>13</sup> Start to Finish, Lichfields, 2024: [https://lichfields.uk/media/w3wjmw0/start-to-finish-3\\_how-quickly-do-large-scale-housing-sites-deliver.pdf](https://lichfields.uk/media/w3wjmw0/start-to-finish-3_how-quickly-do-large-scale-housing-sites-deliver.pdf)

**Table 8: Start to Finish Build Out Rates**

<b>Site Size</b>	<b>Average Build-Out Rate (no. of homes per year)</b>
50-99	22
100-499	60
500-999	83
1,000-1,499	101
1,500-1,999	130
2,000+	188

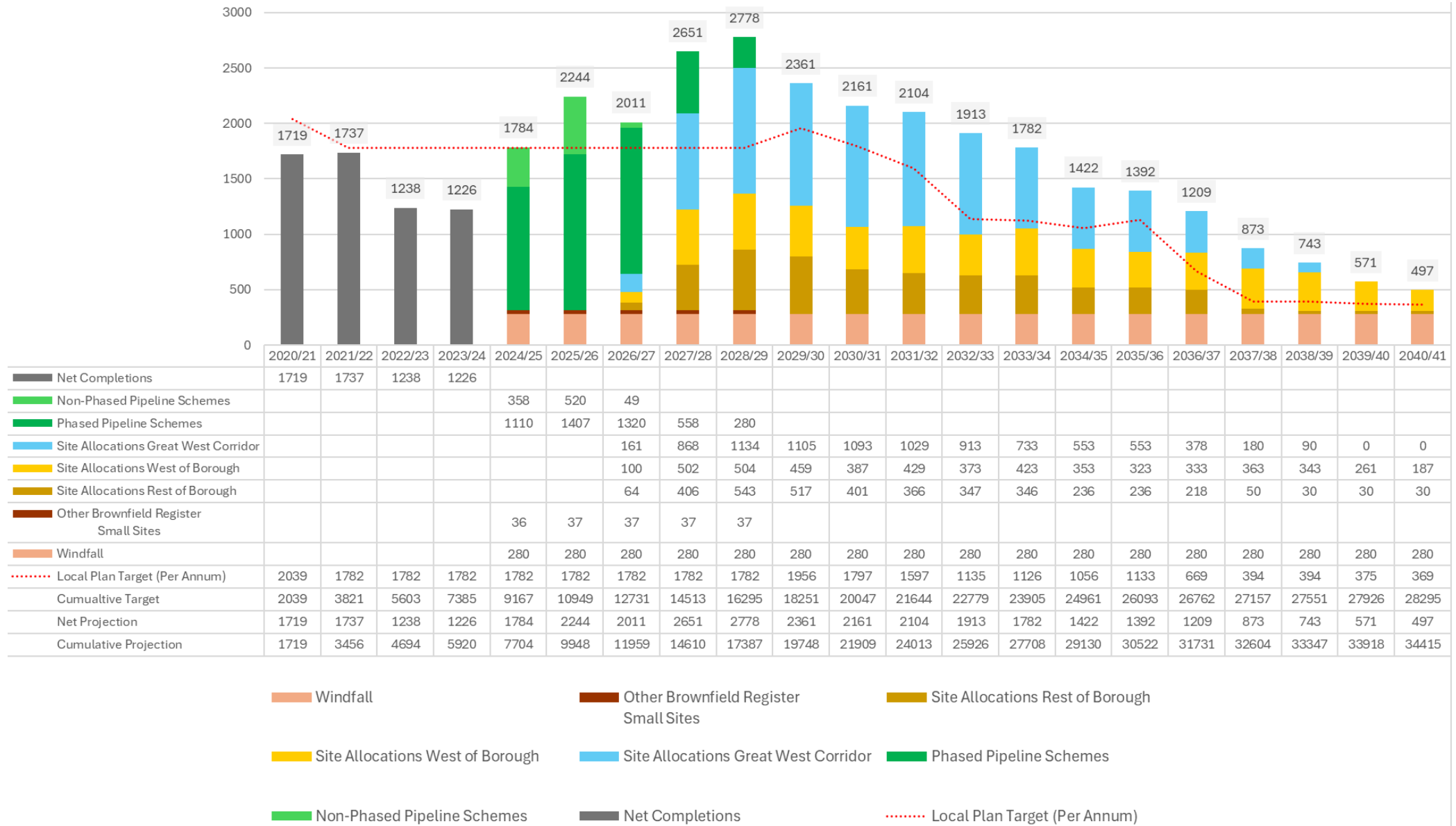
### **Findings of Trajectory**

- 5.14 As set out in paragraph 4.24, for the five year period 2023/2024 to 2028/29 the borough anticipates a total of 11,467 completions, or an average of 2,293 per annum.
- 5.15 For the ten-year period 2023/2024 –2032/33 the borough anticipates a total of 21,788 completions, or an average of 2,179 per annum. As such, the borough anticipates that it will exceed its housing target for the next ten years of the plan period.
- 5.16 For the remainder of the plan period beyond the next 10 years, from years 2033/2034 to 2040/2041, the borough anticipates delivery of a further 6,707 homes, though it is expected this will, over the course of time, significantly increase through the identification of additional sites through future Strategic Housing Land Availability Assessment exercises. It should also be noted that the NPPF is clear that developable sites and broad locations for growth should be identified *where it is possible*<sup>14</sup> for years 11-15 of the remaining plan period.
- 5.17 The updated Housing Trajectory is illustrated on page 31 overleaf.

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<sup>14</sup> LBH's emphasis added

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



## 6. Delivery of Housing

### Policy context

- 6.1 The NPPF (para. 60) states that *“it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”*. To this end, para. 63 goes on to state that *“the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)”*.
- 6.2 The adopted London Plan (2021) mirrors this national policy direction by stating that ((Policy GG4) *“those involved in planning and development must a) ensure that more homes are delivered, b) support the delivery of the strategic target of 50% of all new homes being genuinely affordable, c) create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing, d) identify and allocate a range of sites to deliver housing locally, and e), establish ambitious and achievable build-out rates at the planning stage [...]”*.
- 6.3 Of relevance to this chapter, Policy GG2 of the London Plan 2021 states that *“those involved in planning and development must a) enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites, b) prioritise sites which are well-connected by existing or planned public transport, c) proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling and d) applying a design-led approach to determine the optimum development capacity of sites [...]”*.
- 6.4 Diversity of site size and type is also recognised within the NPPF. Para 70 emphasises the important contribution that small and medium sized sites can make in meeting housing requirements, noting that they can often be built-out relatively quickly. Para 70(a) requires Local Plans to accommodate at least 10% of the housing requirement on small sites which, at national level, are those considered to be no larger than one hectare. This requirement is developed further through the London Plan 2021 which, for

the first time, introduces a specific housing target for small sites, defined as those being less than 0.25 hectares in size and with a capacity no greater than 25 units. The NPPF also allows for an allowance for windfall as part of the anticipated supply where there is evidence to support this, including historic windfall delivery rates.

## **Housing delivery**

- 6.5 The updated Housing Trajectory shows the delivery of 34,415 new homes over the period 2020-2041. Of these, it is projected that 17,950 will be delivered on site allocations – including 8,790 homes in the borough’s Great Western Corridor, 5,340 in the West of the Borough, 3,820 in the Rest of the Borough.

### **Small Sites**

- 6.6 As mentioned above, para 70(a) of the NPPF requires Local Plans to accommodate at least 10% of the housing requirement on sites of one hectare or less. As a proportion of the total supply in Hounslow’s updated Housing Trajectory, 5,959 homes are identified for delivery on small sites of 1 hectare or less of which:
- 3,040 homes are identified on allocated sites
  - 184 homes are on small sites on Brownfield Land Register
  - 2,735 homes are part of the pipeline sites with consent.
- 6.7 As such, it is demonstrated that 17.3% of the 34,415 homes identified in the updated Housing Trajectory are located on sites of 1 hectare or less. When compared to the submission version Local Plan housing target of 28,040, this would mean 21.3% of the total site supply is on sites of 1 hectare or less, in compliance with paragraph 70 of the NPPF. This is well above the NPPF requirement for 10% of sites, without even taking account of the windfall allowance for small sites of 0.25 hectares or less. If this allowance was also included, the percentage of small sites as part of the total housing supply would be even greater.
- 6.8 The London Plan includes a small sites target of 2,800 homes from 2019/20 to 2028/29 for Hounslow. It should be noted that the definition of a small site in the London Plan (2021) is 0.25 hectares or less, which is much smaller than the NPPF definition.
- 6.9 Between years 2019/20 and 2023/24, completions figures (included in Appendix 1 - *Completions on Small Sites of less than 0.25 hectares 2019/20 –*

2023/24) show that a total of 2,278 homes have been delivered on small sites in Hounslow. The Brownfield Land Register is another source of supply that comprises 184 homes on sites that are 0.25 hectares or smaller which are anticipated to come forward between years 2024/25 and 2028/29 of the Trajectory. In addition, of the pipeline permissions that are included in the Housing Trajectory, a total of 1,142 homes are located on sites that are 0.25 hectares or smaller which are anticipated to come forward between years 2024/25 and 2028/29 of the Trajectory.

- 6.10 Collectively this contributes a capacity of 3,604 homes on small sites of 0.25 hectares or less in Hounslow that will be delivered over the period 2019/20 and 2028/29. This exceeds the London Plan target of 2,800 homes over the same period by 804 homes.
- 6.11 Overall, therefore LBH has been comprehensive in its approach to identifying small sites as part of the Local Plan housing supply, exhausting all available options, including a site search through the SACA process to fully identify the borough's supply of small sites, in addition to past completions, and pipeline permissions.

### **Specialist Older Persons Housing**

- 6.12 The London Plan also includes indicative annual borough benchmarks for the delivery of Specialist Older Persons Housing (SOPH), covering the period 2017 to 2029. Policy H13 of the London Plan – Specialist Older Persons Housing, is clear that the benchmarks are indicative, with the supporting text to the policy describing them as the *“total potential demand in London across all tenures”*. Furthermore, the supporting text continues to state, *“These benchmarks are designed to inform local level assessments of specialist housing need. Boroughs should plan proactively to meet identified need for older persons accommodation.”*
- 6.13 Accordingly, LBH has produced a Local Housing Needs Assessment (2024) that includes its own assessment of need for specialist housing for older people in the borough. Based on this, an annual need figure of 73 for specialist older persons housing is set out in Policy SC8 of the emerging Local Plan.
- 6.14 However, it is useful to compare delivery of this type of housing to date against the indicative benchmark for Hounslow in Table 4.3 of Policy H13 of the London Plan, which is 135 SOPH per annum. The delivery of SOPH against this indicative benchmark is set out in Appendix 4 of this paper - *Specialist Older Persons Housing Completions 2017/18 – 2023/24*. It should be

noted that because SOPH was introduced as a defined category of housing in the London Plan 2021, monitoring records for SOPH are only available from 1<sup>st</sup> April 2019 onwards, which is the base date of the London Plan.

### **Conclusion**

- 6.15 The steps outlined in this paper demonstrate that Hounslow has taken a 'no stone left unturned' approach to site identification, assessing the full range and mix of sites across the borough to determine their appropriateness for inclusion in the Housing Trajectory.
- 6.16 In total, the Housing Trajectory for the borough demonstrates that LBH has a sufficient supply of sites to meet its London Plan housing target of 1,782 dwellings per annum over the period 2020/21 – 2028/29 plus backlog from 2019/20. It also demonstrates that there is a sufficient supply of sites for the remainder of the plan period where the capacity based approach is applied to determine the borough's housing target, which in the submission version of the Local Plan, averages at 1,000 homes per annum.
- 6.17 LBH has applied a lapse rate to the planning consents that have not yet commenced in the Housing Trajectory informed by historic trends to ensure it is based on realistic assumptions and to provide a buffer of capacity which ensures choice and competition in the market. Following the Covid-19 pandemic, there has not been clear evidence to suggest that housing delivery may be suppressed in Hounslow during the plan period.
- 6.18 LBH has taken a proactive approach to identifying sites on brownfield land, with almost the entire supply of housing sites for the Local Plan on brownfield land.
- 6.19 We have adopted a realistic approach to housing delivery by taking account of planned infrastructure investment within the borough. For example, the updated Trajectory shows that a significant proportion of site allocations accounting for 8,790 homes will come forward in the Great West Corridor which is likely to benefit from improved accessibility in the Plan as a result of improvements to the walking and cycling network, bus network and planned delivery of a new station at Lionel Road South on the proposed West London Orbital Line. The Housing Trajectory is therefore underpinned by strong urban design principles which take account of future accessibility and connectivity within and outside of LBH.
- 6.20 The Housing Trajectory's supply is also informed partially through the extensive masterplanning exercises commissioned by LBH. Namely, the scale and massing and associated typologies of identified sites included

within the Feltham Masterplan<sup>15</sup> and Great West Corridor Masterplan and Capacity Study<sup>16</sup> which helped to determine the overall land use mix and housing figures for site allocations.

- 6.21 LBH is committed to meeting its full housing target over the plan period and has taken a robust approach to site identification and assessment, considering alternatives, planning for a wide range of sites to come forward, and making realistic assumptions about rates of delivery over the Plan period.

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<sup>15</sup> Feltham Masterplan (2017)

<sup>16</sup> Great West Corridor masterplan (2020)

## Appendix 1: Completions on Small Sites of less than 0.25 hectares 2019/20 – 2023/24

Monitoring Year	Hounslow Small Sites Completions Target (London Plan Table 4.2)	Actual Completions on Small sites (no. of Homes)	Difference (no. of homes completed compared to small sites target)
2019/20	280	341	+ 61
2020/21	280	498	+ 218
2021/22	280	515	+ 235
2022/23	280	297	+ 17
2023/24	280	627	+ 347
<b>Total</b>	<b>1,400</b>	<b>2,278</b>	<b>+878</b>

## Appendix 2: Pipeline Sites with Planning Permission at Base Date of Updated Housing Trajectory (1<sup>st</sup> April 2024)

Planning Application Ref	Address	Postcode	Homes Contributing to Supply	Anticipated Phasing	Development Status
P/2018/4329	HOLP44, HOUNSLOW CIVIC CENTRE AND 88 LAMPTON ROAD, LAMPTON ROAD	TW3 4DW	18	2024/25	Commenced
P/2013/1812	LAND AT LIONEL ROAD, Lionel Road	TW8 9QR	262	2026/27 to 2028/29	Commenced
P/2019/1203	Land to the South Side of, High Street	TW8 8EW	210	2024/25 to 2025/26	Commenced
P/2019/2212	THE CIVIC CENTRE, 88, LAMPTON ROAD	TW3 1JB	498	2024/25 to 2026/27	Commenced
P/2018/4117	1-4 CAPITAL INTERCHANGE WAY, 1-4, Capital Interchange way	TW8 0EX	420	2025/26 to 2026/27	Commenced
P/2022/1142	69-76 High Street, Brentford	TW8 0AA	333	2025/26 to 2028/29	Commenced
P/2019/2892	MORRISONS, 228-246, High Street	TW8 0JG	215	2025/26 to 2026/27	Commenced
P/2014/3288	Site Allocation HOLP3, 408-430, Chiswick High Road	W4 5TF	116	2024/25 to 2026/27	Commenced
P/2018/2426	Land To The Rear Of 21, High Street, TW13 4AG		67	2024/25	Commenced
P/2021/4779	Land South of Brentford High Street and Waterside	TW8 8EW	116	2025/26 to 2027/28	Commenced
P/2018/1778	Land adjacent to Tesco, Manor Lane	TW13 4JQ	1	2024/25	Commenced
P/2018/0738	12-32, LAMPTON ROAD	TW3 1JH	76	2024/25 to 2028/29	Commenced
P/2021/0894	Clements Court Estate, CLEMENTS COURT, Green Lane	TW4 6EB	74	2024/25 to 2027/28	Commenced
P/2021/2614	London Road, TW3 1SE		55	2024/25 to 2026/27	Commenced

<b>Planning Application Ref</b>	<b>Address</b>	<b>Postcode</b>	<b>Homes Contributing to Supply</b>	<b>Anticipated Phasing</b>	<b>Development Status</b>
P/2019/1530	UNITS 1 AND 2 AND PARTS GARAGE, RENNELS WAY	TW7 6NA	53	2024/25 to 2026/27	Commenced
P/2020/4433	Rose Gardens	TW13 4JG	25	2024/25 to 2025/26	Commenced
P/2016/5416	WESTWARD HOUSE, 155-157, Staines Road	TW3 3JB	36	2024/25	Commenced
PA/2021/2728	361-365 Chiswick High Road	W4 4HS	34	2024/25 to 2026/27	Commenced
PAC/2020/0333	02-04 Lampton Road	TW3 1HU	33	2024/25 to 2025/26	Commenced
P/2020/3659	1A Inwood Avenue	TW3 1XF	7	2024/25	Commenced
P/2019/1117	High Street, Brentford		30	2024/25 to 2025/26	Commenced
P/2018/2611	359 Staines Road	TW4 5AP	24	2024/25 to 2025/26	Commenced
P/2019/1329	141-149 STAINES ROAD	TW3 3JB	25	2024/25 to 2025/26	Commenced
PA/2015/3349	155-159 Staines Road	TW3 3JB	23	2024/25	Commenced
P/2019/3801	Bethany Waye		19	2024/25	Commenced
P/2020/1834	AUGUSTUS CLOSE		18	2024/25	Commenced
P/2019/0092	Swan Road		18	2024/25	Commenced
PAC/2018/4844	Saracen House, Swan Street, TW7 6RJ		12	2025/26	Commenced
P/2018/0327	New 4th floor, 2-72, COLE GARDENS, TW5 9RJ		12	2025/26	Commenced
P/2021/1758	St Marys Drive	TW14 8JT	9	2024/25	Commenced
P/2022/0025	6 Sparrow Farm Drive	TW14 0EA	9	2024/25	Commenced
P/2018/3786	Site C Watermead	TW14 8BA	9	2024/25	Commenced
P/2020/3265	65-67 Hanworth Road	TW3 1TT	9	2024/25	Commenced
P/2018/0536	182 High Street	TW3 1HL	8	2024/25	Commenced
P/2019/1277	71A Lampton Road	TW3 4DH	8	2024/25	Commenced

<b>Planning Application Ref</b>	<b>Address</b>	<b>Postcode</b>	<b>Homes Contributing to Supply</b>	<b>Anticipated Phasing</b>	<b>Development Status</b>
P/2015/2236	96-98 High Street	TW3 1NH	8	2024/25	Commenced
P/2021/3190	30-42 Spinney Drive	TW14 8PN	7	2024/25	Commenced
P/2019/2471	Upper Square	TW7 7BN	6	2024/25	Commenced
P/2022/3200	328a Hanworth Road	TW3 3SH	5	2024/25	Commenced
P/2022/2734	84 BATH ROAD	TW3 3EQ	6	2025/26	Commenced
P/2020/1455	Hanworth Road	TW3 3UF	6	2024/25	Commenced
P/2022/2475	Oakley Close	TW7 4HZ	6	2024/25	Commenced
P/2019/4235	63 Whitton Road	TW3 2DG	5	2024/25	Commenced
P/2021/2363	520, Bath Road	TW5 9UP	3	2024/25	Commenced
P/2021/3193	7 Becketts Close	TW14 0BG	4	2024/25	Commenced
P/2016/4495	DEVELOPMENT SITE AT FORMER THAMES WATER LAND KEW BRIDGE ROAD	TW8 0EF	4	2024/25	Commenced
P/2022/0179	3 Grove Park Gardens	W4 3RY	3	2024/25	Commenced
P/2020/1294	440 Chiswick High Road		3	2024/25	Commenced
P/2021/2342	98 Windmill Road	TW8 9NA	3	2024/25	Commenced
P/2021/0376	07-12 The Dell	TW14 0JF	3	2024/25	Commenced
P/2021/4445	333 BATH ROAD	TW3 3DH	3	2024/25	Commenced
P/2020/1444	BATH ROAD	TW4 7DN	2	2024/25	Commenced
P/2020/4508	Garage block adj, 44-48 Fir Road	TW13 6UJ	2	2024/25	Commenced
P/2022/1613	35 Hampton Road East	TW13 6JB	7	2024/25	Commenced
P/2020/4510	2 Forge Lane	TW13 6UW	2	2024/25	Commenced
P/2021/3933	257A High Street	TW3 1EA	2	2024/25	Commenced
P/2020/0966	1 VILLIERS ROAD	TW7 4HW	1	2024/25	Commenced
P/2020/4509	9 Fir Road	TW13 6UJ	2	2025/26	Commenced

<b>Planning Application Ref</b>	<b>Address</b>	<b>Postcode</b>	<b>Homes Contributing to Supply</b>	<b>Anticipated Phasing</b>	<b>Development Status</b>
P/2021/0377	The Dell	TW14 0JF	2	2024/25	Commenced
P/2022/4040	305 Whitton Dene	TW7 7NE	1	2024/25	Commenced
P/2023/1461	12 Benedict Drive	TW14 8JL	2	2025/26	Commenced
P/2022/3391	196 Great West Road	TW5 9AR	2	2024/25	Commenced
P/2021/0857	5 Lampton Park Road	TW3 4HS	1	2024/25	Commenced
P/2022/2429	6 Northumberland Crescent	TW14 9SZ	1	2024/25	Commenced
P/2021/4321	265A Chiswick High Road	W4 4PU	1	2024/25	Commenced
P/2018/2168	Brentford Lock West, COMMERCE ROAD	TW8 8LR	437	2024/25 to 2027/28	Not started
P/2017/4692	LAND AT CITROEN SITE, Capital Interchange way	TW8 0EX	427	2024/25 to 2026/27	Not started
P/2019/3140	1-3 Bath Road	TW3 3BJ	241	2025/26 to 2028/29	Not started
P/2021/4783	Charlton House, Albany Road	TW8 0NG	113	2025/26 to 2027/28	Not started
P/2021/4778	Land South of Brentford High Street and Waterside	TW8 8EW	175	2025/26 to 2028/29	Not started
P/2021/1258	New Road Triangle, N/A, TRIANGLE SITE, New Road	TW13 4BY	170	2024/25 to 2025/26	Not started
PAC/2021/2802	HEATHROW HOUSE, Bath Road	TW5 9AT	163	2024/25	Not started
P/2022/2379	Manderson House, Commerce Road	TW8 8LF	107	2026/27 to 2028/29	Not started
P/2018/1208	Site Allocation HOLP14, Griffin Park, Braemar Road	TW8 0NT	72	2025/26 to 2026/27	Not started
PAC/2021/3092	Block B, VISTA BUSINESS CENTRE, Salisbury Road, TW4 6JQ		71	2025/26 to 2028/29	Not started
P/2020/1361	50, London Road	TW8 8AP	66	2025/26 to 2028/29	Not started

<b>Planning Application Ref</b>	<b>Address</b>	<b>Postcode</b>	<b>Homes Contributing to Supply</b>	<b>Anticipated Phasing</b>	<b>Development Status</b>
PAC/2021/3093	BLOCK A Floors 1, 2, 3, 6 & 7, VISTA BUSINESS CENTRE, BLOCK A, 50, Salisbury Road	TW4 6JQ	54	2024/25	Not started
P/2020/1176	CHISWICK HEALTH CENTRE, Fishers Lane	W4 1RX	52	2025/26 to 2027/28	Not started
PALL/2021/4199	Fleming Way, TW7 6DB		22	2024/25	Not started
P/2019/3416	BATH ROAD, TW5 9UP		19	2025/26	Not started
P/2022/1974	50-56 Fern Grove	TW14 9AY	16	2025/26	Not started
P/2019/3818	1-20, Loraine Road	W4 3QT	-16	2025/26	Not started
P/2022/0026	82-96 Oxford Way		16	2026/27	Not started
P/2021/3807	GUNNERSBURY CLOSE		14	2025/26	Not started
P/2021/3802	Swann Court, South Street		11	2025/26	Not started
PAC/2022/3120	462 London Road	TW7 4ED	11	2025/26	Not started
P/2021/3808	Oxford Court Wellesley Road	W4 4DJ	10	2025/26	Not started
P/2022/1975	Garages/Land at Nursery Close, Fern Grove	TW14 9BE	9	2025/26	Not started
P/2020/4489	Ashford Road, Feltham		9	2025/26	Not started
P/2019/3391	LAND ADJACENT TO, 3, Boston Manor Road	TW8 8DZ	9	2026/27	Not started
P/2021/0188	581, London Road	TW7 4EJ	9	2026/27	Not started
P/2021/2796	GARAGES REAR OF, 27, Becketts Close	TW14 0BG	9	2026/27	Not started
P/2021/4955	143 Bedfont Lane	TW14 9NH	5	2025/26	Not started
P/2022/1595	249-253 High Street	TW3 1EA	8	2025/26	Not started
P/2021/0542	495 Staines Road	TW4 5AR	7	2025/26	Not started
P/2022/1138	1 Acton Lane	W4 5LY	0		Not started

<b>Planning Application Ref</b>	<b>Address</b>	<b>Postcode</b>	<b>Homes Contributing to Supply</b>	<b>Anticipated Phasing</b>	<b>Development Status</b>
P/2022/0274	Stamford Brook Avenue	W6 0YA	7	2025/26	Not started
P/2022/3334	52 Hanworth Road	TW3 1LR	7	2025/26	Not started
P/2023/1836	100 North Drive	TW3 1PU	7	2025/26	Not started
P/2022/0603	44 New Heston Road	TW5 0LJ	4	2025/26	Not started
P/2021/2466	Manor Gardens - Hounslow '5000 Pledge', GARAGE BLOCKS AT, MANOR GARDENS, Devonshire Road	W4 2HY	6	2025/26	Not started
P/2021/4480	189, High Street	TW3 1BL	5	2025/26	Not started
P/2021/3809	Quinton Court, Spencer Road	W4 3SL	6	2025/26	Not started
P/2021/4719	Oxford Court, Oxford Way	TW13 6RZ	6	2025/26	Not started
P/2021/3192	Layton Court, Brook Lane North	TW8 0QW	6	2025/26	Not started
P/2023/0657	21A Woodfield Road	TW4 6LL	6	2025/26	Not started
P/2021/1439	Garage blocs at Clifton Parade, Elmwood Avenue	TW13 7DD	6	2025/26	Not started
P/2023/0440	154 Ash Grove	TW5 9DS	6	2025/26	Not started
AHF/2023/1196	10 Staines Road	TW3 3JS	6	2025/26	Not started
PAC/2022/0946	58-59 High Street	TW8 0AH	6	2025/26	Not started
P/2022/3299	Kew House, 84 North Road	TW8 0GJ	5	2025/26	Not started
P/2022/1384	67 Ellesmere Road	W4 3EA	4	2025/26	Not started
P/2023/3178	346 Chiswick High Road	W4 5TA	5	2025/26	Not started
P/2021/3871	1 Hampton Road West	TW13 6AH	5	2025/26	Not started
P/2022/2156	100-102 Chiswick High Road	W4 1SH	5	2025/26	Not started
P/2022/3520	20 The Grove	TW7 4JX	5	2025/26	Not started
P/2023/2528	High Street	TW13 4AG	5	2025/26	Not started

<b>Planning Application Ref</b>	<b>Address</b>	<b>Postcode</b>	<b>Homes Contributing to Supply</b>	<b>Anticipated Phasing</b>	<b>Development Status</b>
P/2021/3938	Garage block r/o 21 & 31, St Thomas Road	W4 3LB	5	2025/26	Not started
P/2023/0495	140 High Street	TW3 1LR	4	2025/26	Not started
P/2023/1913	62 Hounslow Road	TW13 6QH	4	2026/27	Not started
P/2021/2631	FORMER GARAGE BLOCK & LAND REAR OF, 17-39, BETHANY WAYE	TW14 8HJ	4	2025/26	Not started
P/2022/0600	13 Spring Road	TW13 7JA	-4	2024/25	Not started
P/2023/2879	520 BATH ROAD	TW5 9UP	0	2025/26	Not started
P/2021/1736	Cedar Road - Hounslow '5000 Pledge', GARAGES BETWEEN , 4-6, Cedar Road	TW14 8EU	4	2025/26	Not started
P/2022/0248	Garages adj 2 Carville Crescent	TW8 9RD	4	2025/26	Not started
P/2022/1612	9 Epworth Road	TW7 5BL	4	2025/26	Not started
P/2022/1532	2 Exeter Road	TW13 5PE	4	2025/26	Not started
P/2021/5018	Garages at Florence Gardens	W4 3JX	4	2025/26	Not started
P/2017/3004	251-253 Hanworth Road	TW3 3UF	4	2025/26	Not started
P/2023/2073	The Vineyards, High Street	TW13 4HH	4	2025/26	Not started
P/2022/1934	Land r/o Rectory Court RECTORY ROAD	TW4 7QF	4	2025/26	Not started
P/2022/1838	Land adj to 13-15 Birch Road	TW13 6UL	4	2025/26	Not started
P/2022/0602	537A Staines Road	TW14 8BP	4	2025/26	Not started
P/2021/3868	Garage blocks at The Clumps	TW15 1AT	4	2025/26	Not started
P/2023/2023	2 Parkfield Road	TW13 7LG	3	2025/26	Not started
P/2021/4805	3 High Street	TW8 0DX	3	2025/26	Not started
P/2022/4013	36 Sutton Lane	TW3 3BD	3	2025/26	Not started
P/2022/1736	93 Chiswick High Road	W4 2EF	3	2025/26	Not started
P/2022/1220	126 Barrowgate Road	W4 4QP	3	2025/26	Not started

<b>Planning Application Ref</b>	<b>Address</b>	<b>Postcode</b>	<b>Homes Contributing to Supply</b>	<b>Anticipated Phasing</b>	<b>Development Status</b>
P/2021/4977	3 LONGLEAT WAY	TW14 8JW	3	2025/26	Not started
P/2022/4033	94A BATH ROAD	TW3 3EH	3	2025/26	Not started
P/2023/1212	Cavendish House, Cavendish Road	W4 3TD	3	2025/26	Not started
P/2022/3982	68 High Street	TW8 0AH	3	2025/26	Not started
P/2021/3806	G1-G18 The Lindens	W4 3UQ	3	2025/26	Not started
P/2021/3805	Garage Block Adj, 1 Shore Close	TW14 9QE	3	2025/26	Not started
P/2023/1203	40 Thorney Hedge Road		2	2025/26	Not started
P/2023/0304	40 Thorney Hedge Road		2	2025/26	Not started
P/2023/3502	163 Hanworth Road	TW3 3TT	2	2025/26	Not started
P/2022/1988	202 High Street	TW8 8AH	2	2025/26	Not started
P/2022/3922	North Drive	TW3 1PU	2	2025/26	Not started
P/2022/3742	Duke of York Devonshire Road	W4 2HU	2	2025/26	Not started
P/2023/0266	225 High Street	TW8 8AH	2	2025/26	Not started
P/2022/1761	Worton Hall, Worton Road	TW7 6ER	2	2025/26	Not started
P/2022/0137	Garage Block at Garth Court	W4 4QL	2	2025/26	Not started
P/2022/2015	303 Jersey Road	TW7 5PH	2	2025/26	Not started
P/2022/0691	Garages adj, 26 Cherry Crescent	TW8 8NN	2	2025/26	Not started
P/2022/1681	217 High Street	TW3 1DH	2	2025/26	Not started
P/2022/0597	Garages adj, 12 Almond Grove	TW8 8NL	2	2025/26	Not started
P/2022/1726	London Road	TW7 5BG	2	2025/26	Not started
P/2022/0879	43 Canterbury Road	TW13 5LE	2	2025/26	Not started
P/2023/3280	Garages adj, 12 Almond Grove		2	2025/26	Not started
P/2022/2152	Magdala Road	TW7 7DD	2	2025/26	Not started
P/2022/3400	Garage block at Grove Park Road		2	2025/26	Not started

<b>Planning Application Ref</b>	<b>Address</b>	<b>Postcode</b>	<b>Homes Contributing to Supply</b>	<b>Anticipated Phasing</b>	<b>Development Status</b>
P/2022/1578	121 Inwood Road	TW3 1XW	2	2025/26	Not started
P/2022/1959	208 High Street	TW3 1HE	2	2025/26	Not started
P/2023/3278	Garages adj, 26 Cherry Crescent		2	2025/26	Not started
PA/2022/2371	1 Brook Lane North	TW8 0QW	2	2025/26	Not started
P/2022/3070	6 Lafone Avenue	TW13 5DH	1	2025/26	Not started
P/2023/0650	44 Turnham Green Terrace	W4 1QP	1	2025/26	Not started
P/2023/0321	2 Dorset Way	TW5 0ND	1	2025/26	Not started
P/2022/2555	2A South Street	TW7 7BG	1	2025/26	Not started
P/2023/0801	54A Kew Bridge Road	TW8 0EW	1	2025/26	Not started
P/2022/1692	5 Gould Road	TW14 8AB	1	2025/26	Not started
P/2022/0634	41 Clitherow Road	TW8 9JT	1	2025/26	Not started
P/2022/0532	68 Park Road	W4 3HL	1	2025/26	Not started
P/2021/1961	166 Ash Grove	TW5 9DT	1	2025/26	Not started
P/2022/2545	15a Elmwood Road	W4 3DY	-1	2024/25	Not started
P/2023/0133	Warfield Road	TW14 8AD	2	2025/26	Not started
P/2022/2710	64 Whitton Road	TW3 2DD	1	2025/26	Not started
P/2022/0399	588 Great West Road	TW5 0TH	1	2025/26	Not started
P/2023/2456	Hamilton Road	TW8 0QF	1	2025/26	Not started
P/2022/0533	77 Basildene Road	TW4 7LG	1	2025/26	Not started
P/2021/5000	Garages adj, 48 Beech Avenue	TW8 8NH	1	2025/26	Not started
P/2022/0599	140 Cygnet Avenue	TW14 0DT	1	2025/26	Not started
P/2022/1631	Byfield Road	TW7 7AF	1	2025/26	Not started
P/2021/5001	Garages adj, 86 Beech Avenue	TW8 8NH	1	2025/26	Not started
P/2022/3768	Lafone Avenue	TW13 5DH	1	2025/26	Not started

<b>Planning Application Ref</b>	<b>Address</b>	<b>Postcode</b>	<b>Homes Contributing to Supply</b>	<b>Anticipated Phasing</b>	<b>Development Status</b>
P/2022/2221	Garage block adj., 1-6 Beaconsfield Close	W4 4EL	1	2025/26	Not started
P/2021/3599	78 Wigley Road	TW13 5HE	1	2025/26	Not started
P/2022/3691	4 St Dunstons Road	TW13 4JU	1	2025/26	Not started
P/2023/2931	Land adj., 8 Chaucer Avenue	TW4 6NB	1	2025/26	Not started
P/2022/2798	158A Hounslow Road	TW13 6AA	1	2025/26	Not started
P/2022/0728	45 BATH ROAD	TW3 3BN	1	2025/26	Not started
P/2022/1773	421 London Road	TW7 5AQ	1	2025/26	Not started
P/2022/2820	590 Chiswick High Road	W4 5RP	1	2025/26	Not started
P/2023/2933	32 CROSS LANCES ROAD	TW3 2AA	1	2025/26	Not started
P/2022/0752	Land r/o 63 Swan Road	TW13 6PE	1	2025/26	Not started
P/2023/0015	Pownall Gardens	TW3 1YW	1	2025/26	Not started
P/2023/0704	12 Benedict Drive	TW14 8JL	1	2025/26	Not started
P/2023/0287	49 STAR ROAD	TW7 4HU	1	2025/26	Not started
P/2023/0952	30 Chiswick High Road	W4 1TE	1	2025/26	Not started
P/2022/1795	124 Cygnet Avenue	TW14 0DT	1	2025/26	Not started
P/2023/2245	Land adj. to Exeter Road	TW13 5NX	1	2025/26	Not started
P/2022/2408	Westbury Place	TW8 0QG	1	2025/26	Not started
P/2023/0480	2 Park Close	TW3 2HW	1	2025/26	Not started
P/2023/2455	7 Tachbrook Road	TW14 9PD	1	2025/26	Not started
P/2023/2454	34 Meadow Road	TW13 5JA	1	2025/26	Not started
P/2023/1962	1 Harvest Road	TW13 7JH	1	2025/26	Not started
P/2022/3197	2 Durham Road	TW14 0AD	1	2025/26	Not started
P/2023/3068	18 New Road	TW13 6TQ	1	2025/26	Not started
P/2022/3644	90 Linkfield Road	TW7 6QH	1	2025/26	Not started

<b>Planning Application Ref</b>	<b>Address</b>	<b>Postcode</b>	<b>Homes Contributing to Supply</b>	<b>Anticipated Phasing</b>	<b>Development Status</b>
P/2022/3511	93 St Johns Road	TW7 6PN	1	2025/26	Not started
P/2022/3137	45 Elmer Gardens	TW7 6EZ	1	2025/26	Not started
P/2022/1881	112 Wellington Road North	TW4 7AA	1	2025/26	Not started
P/2023/1976	1A Westbury Place	TW8 0QG	1	2025/26	Not started
P/2021/4465	7 Gould Road	TW14 8AB	1	2025/26	Not started
P/2023/1771	18 Grove Road	TW7 4JH	1	2025/26	Not started
P/2022/1114	32 Osborne Close	TW13 6SR	1	2025/26	Not started
P/2022/2444	38 Beech Avenue	TW8 8NH	1	2025/26	Not started
P/2021/4586	132 Heath Road	TW3 2NW	1	2025/26	Not started
P/2022/0096	51 Maswell Park Crescent	TW3 2DR	1	2025/26	Not started
P/2021/3289	50 Thornbury Road	TW7 4LL	1	2025/26	Not started
P/2022/2179	588 Great West Road	TW5 0TH	1	2025/26	Not started
PAC/2023/0612	Thames House Swan Street	TW7 6RS	1	2025/26	Not started
PALL/2022/3011	20 St Dunstons Road	TW13 4JU	1	2025/26	Not started
P/2021/3746	42A Hanworth Road	TW13 5AY	1	2025/26	Not started
P/2022/1555	100 Central Avenue	TW3 2QL	2	2025/26	Not started
P/2022/1053	157 Brabazon Road	TW5 9LN	2	2025/26	Not started
P/2022/3643	Hayre Court, 5 Renfrew Road	TW4 7DW	2	2025/26	Not started
P/2022/2244	8 Fareham Road	TW14 0EQ	2	2025/26	Not started
P/2022/0933	15 Lonsdale Road	W4 1ND	-1	2024/25	Not started
P/2022/3888	GF Flat, 148 Park Road	W4 3HP	-1	2024/25	Not started
P/2022/0903	13 Beverley Road	W4 2LL	-1	2024/25	Not started
P/2022/4016	Mayfield Avenue	W4 1PN	-1	2024/25	Not started

<b>Planning Application Ref</b>	<b>Address</b>	<b>Postcode</b>	<b>Homes Contributing to Supply</b>	<b>Anticipated Phasing</b>	<b>Development Status</b>
P/2022/2222	49 Wilton Avenue	W4 2HX	-1	2024/25	Not started
P/2023/2553	70A Wavendon Avenue	W4 4NS	-1	2024/25	Not started
P/2023/0394	44 Binns Road	W4 2BS	-1	2024/25	Not started
P/2023/0365	35A Whitton Road	TW3 2DB	-1	2024/25	Not started
P/2023/0565	20 Heathfield Gardens	W4 4JY	-1	2024/25	Not started
P/2022/3762	18 Priory Avenue	W4 1TY	-2	2024/25	Not started
P/2023/2154	Basement flat, Grove Park Road	W4 3RU	-2	2024/25	Not started
P/2023/3826	227B High Street	TW3 1DH	0	2025/26	Not started
P/2023/0914	19 Grosvenor Road	W4 4EQ	-3	2024/25	Not started
P/2022/2719	146 Kingsley Road	TW3 4AD	2	2025/26	Not started
P/2023/0620	46 Devonshire Road	W4 2HD	-1	2024/25	Not started
P/2022/0534	41b Thorney Hedge Road	W4 5SB	-1	2024/25	Not started
P/2022/1163	14 St Johns Road	TW7 6NN	-1	2024/25	Not started
P/2022/3488	St Johns Road	TW7 6NN	-1	2024/25	Not started
<b>Total Units Contributing to Supply</b>			<b>5,601</b>		

## Appendix 3: Capacity on Allocations Compared with Equivalent Permissions

Site Allocation no.	Site Allocation name	Planning Application Reference	Site Address	Postcode	Allocation Minimum Development Quantum (MDQ)	No. of Homes Permitted	Difference (homes permitted - allocation MDQ)
2	Tesco Osterley	P/2020/3100	Tesco Superstore, Syon Lane, Isleworth	TW7 5NZ	1030	1677	+ 647
11	Homebase Syon Lane	P/2020/3099	Homebase Ltd, Syon Lane, Isleworth	TW7 5QE	370	473	+ 103
35	B&Q Chiswick	P/2019/3954	2 Larch Drive	W4 5QL	270	386	+ 116
82	206-210 Hanworth Road	P/2021/4144	209 Hanworth Road	TW3 3UA	80	124	+ 44
84	Hounslow Cavalry Barracks	P/2021/0920	Hounslow Cavalry Barracks	TW4 6HD	1000	1525	+ 525
85	379 -389 Staines Road	P/2019/3935	379 Staines Road	TW4 5AX	20	64	+ 44

Site Allocation no.	Site Allocation name	Planning Application Reference	Site Address	Postcode	Allocation Minimum Development Quantum (MDQ)	No. of Homes Permitted	Difference (homes permitted - allocation MDQ)
97	30 Rugby Road	P/2019/3339	30 Rugby Road	TW1 1DG	60	146	+ 86
110	Albany Riverside	P/2017/3372	40 and 40A, High Street	TW8 0DS	190	193	+ 3
111	Brentford Police Station	P/2017/3371	Metropolitan Police Station, Half Acre	TW8 8DH	100	105	+ 5
116	1 Burlington Lane	P/2024/2610	1 Burlington Lane	W4 2RR	90	132	+ 42
<b>Total</b>					<b>3,210</b>	<b>4,825</b>	<b>+1,615</b>

## Appendix 4: Specialist Older Persons Housing Completions 2017/18 – 2023/24

Monitoring Year	Indicative Annual Benchmark for SOPH in Hounslow, set out in the London Plan	Actual Completions on SOPH in Hounslow	Difference (no. of SOPH units completed compared to indicative benchmark)
2017/18	135	Data not available	n/a
2018/19	135	Data not available	n/a
2019/20	135	103	- 32
2020/21	135	0	- 135
2021/22	135	8	- 127
2022/23	135	0	- 135
2023/24	135	0	- 135
<b>Total</b>	<b>945</b>	<b>111</b>	<b>- 564</b>

