

London Borough of Hounslow

Hounslow Local Plan 2020-2041 Housing Background Explanatory Note

June 2025

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1. Introduction

Overview

- 1.1 This 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.
- 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 emerging Hounslow Local 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 equates to 1,000 homes per annum as an average over the remaining 12 years.

- It is proposed that an additional 257 homes are added to Hounslow's housing target from year 1 of the plan period to account for previous under delivery against Hounslow's London Plan target of 1,782 during monitoring year 2019-2020, which is the first monitoring year of the London Plan 2021, which would result in an overall housing target of 28,297 homes.
- LBH has recorded 1,405 completed homes in year 1 of the plan period (2020/2021) and 1,724 completed homes in year 2 of the plan period (2021/2022); a total of 3,129 completed homes.
- At the base date of the Local Plan Housing Trajectory, 31 March 2022, there were a total of 6,965 homes already with planning permission or approval.
- The Local Plan 2020-2041 includes a supply of 15,600 homes on site allocations.
- A further 360 homes have been identified as part of the supply from other identified small sites on the Council's Brownfield Land Register.
- A contribution of 2,680 homes is derived from the Local Plan's windfall allowance over the plan period 2020-2041.
- In addition, we have established capacity of 106 homes from a current estate regeneration project.
- This forms an overall total of 28,840 homes supply, which exceeds the housing target of 28,040 by 800 homes, or with the previous under delivery of 257 homes from year 2019/20 added to the housing target (making the housing target 28,297 homes), this would be exceeded by 543 homes.

2. Housing Need

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)¹ 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

¹ [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 2017² 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. 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). These sites contribute 15,600 homes to the Local Plan housing supply overall with 10,200 of these homes from 2029/30-2040/41.
- 2.9 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). The BLR sites contribute 360 homes to the Local Plan housing supply overall, and 108 homes from 2029/30-2040/41.

² [GLA 2017 SHLAA](#)

- 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 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 has been used to inform the windfall allowance in the housing trajectory in Hounslow, and has been discounted by 50% over the Plan period, in order to allow for any uncertainties associated with this supply and thus avoiding an over-reliance on windfall development to meet housing requirements. In total, an allowance is made for 2,680 homes to come forward through windfall over the plan period, with 1,692 coming forward from 2029/30-2040/41. 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”*.
- 2.13 Local authorities in areas which do not have strategic policies contained in a spatial development strategy produced by the Mayor³ are required to follow 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”*.

³ [NPPF paragraph 17 \(b\)](#)

- 2.14 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 3,368⁴ 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.
- 2.15 Applying the new standard method figure for Hounslow under the NPPF 2024 version would result in a housing need figure of 2,052⁵ 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.
- 2.16 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 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.
- 2.17 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

⁴ 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](#) (16th December 2020 version)

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

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.

- 2.18 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.
- 2.19 In addition, that 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. 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.
- 2.20 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 for the Plan to deliver 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. Consistent with the London Plan 2021, this represents a significant step-change on past delivery rates in the borough, and contributes 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

- 2.21 In determining the most appropriate approach for setting the housing target, regard has been had to national policy and guidance (the NPPF and PPG), the London Plan 2021 in order to apply the most appropriate strategy which is compliant with national policy and in general conformity with the adopted London Plan 2021.
- 2.22 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.
- 2.23 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.
- 2.24 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 2021⁶. 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.

⁶ 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 PPG⁷. 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

⁷ 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 Assessment⁸ 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)⁹ and superseding Hounslow Sustainability, Character and Design Codes SPD (2024)¹⁰.
- 3.13 When assessing the development capacity of a site, LBH developed and utilised a capacity assessment tool¹¹. 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

⁸ [Hounslow Whole Plan Viability Assessment \(2024\)](#)

⁹ London Borough of Hounslow, August 2014, Urban Context and Character Study, Final

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

¹¹ 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 for 2020-2041 Plan Period

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

Housing Completions 2020/21-2021/22

- 3.19 The net completions in Hounslow between 01/04/2020 and 31/03/2022 have been accounted for in the housing trajectory. These total 1,405 net homes in year 1 of the plan period (2020/2021) and 1,724 completed homes in year 2 of the plan period (2021/22) a total of 3,129 completed homes over years 1 and 2 of the plan period against our target of 1,782 homes set out in the London Plan 2021.

Approved Planning Permissions in the Pipeline

- 3.20 The pipeline consists of all approved planning applications that are in the pipeline and not yet completed at 31/03/2022, after years 1 and 2 of the plan period. The updated pipeline contributes 6,965 homes to the overall housing capacity, and has been accounted for in the Housing Trajectory. Of the pipeline permissions, a total of 1,423 homes are located on small sites of below 0.25 hectares in size, as defined in the London Plan 2021.

Site Allocations

- 3.21 Capacities for allocations in the emerging Local Plan 2020-2041 have been accounted for in the Housing Trajectory. The emerging plan includes a supply of 15,600 homes on site allocations. 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 pipeline permission's capacity has not been used, in order to avoid double counting. This is also to reflect that an allocation is LBH's preferred strategy for a site, and should the planning permission lapse, the allocation requirements would still apply.

Estate Regeneration and Council Owned Sites

- 3.22 Capacity for 106 homes has been identified on other suitable, available and achievable sites on Council owned land, including an estate regeneration proposal, which is accounted for in the Housing Trajectory. The site is currently being delivered.

Windfall Allowance

- 3.23 The approach to windfall in the Site Assessment and Capacity report is derived from the Small Sites target in the London Plan 2021.
- 3.24 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. This figure has been used to inform the windfall allowance in the housing trajectory in Hounslow. This has

been discounted by 50% over the Plan period, in order to allow for any uncertainties associated with this supply and thus avoiding an over-reliance on windfall development to meet housing requirements. In total, an allowance is made for 2,680 units to come forward through windfall from 2022/23-2040/41. The approach is consistent with para.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”*.

Brownfield Land Register

- 3.25 The Housing Trajectory includes small sites which are on the Brownfield Land Register with an identified capacity to deliver approximately 360 homes. This figure excludes sites that form part of the pipeline permissions, in order to avoid double counting. Sites on the register are projected to be delivered within years 2022/2023 to 2031/2032 of the plan period. Phasing of these is thus split equally over this period, at 36 units per annum.
- 3.26 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, and combined with the windfall allowance, give a total delivery of 3,040 homes over the plan period.
- 3.27 The Housing Trajectory includes sites from all of the sources set out above. A lapse rate has been applied to permitted sites which is based on the trend lapse rate in permitted sites over the most recently monitored 10 year period. The lapse rate applied is 4% to pipeline sites with planning permission that have not yet commenced, reduced to 2% for pipeline sites that are under construction. The lapse rate of 4% has also been applied to site allocations in order to ensure realistic assumptions are incorporated within the housing trajectory.
- 3.28 The updated trajectory shows that a total of 28,840 homes will be delivered over the plan period, which is 102.9% of the Housing Target of 28,040, or with the previous under delivery of 257 homes from year 2019/20 added to the housing target (making the housing target 28,297 homes) would be 101.9% of the Housing Target.
- 3.29 A full breakdown of housing supply figures accounted for in the housing trajectory, is set out in Table 1 overleaf:

Table 1: Expected Delivery of Housing over the Plan period	
	RESIDENTIAL UNITS
Homes completed during monitoring years 2020-2021 and 2021-2022	3,129
Pipeline sites with planning approval	6,965
Site allocations	15,600
Current estate regeneration site	106
Other small sites on the Brownfield Land Register	360
Windfall allowance	2,680
TOTAL CAPACITY	28,840

4. Housing Trajectory

- 4.1 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.”*
- 4.2 The housing trajectory for the Local Plan is set out in Figure 1 overleaf. This shows the breakdown of anticipated completions on an annual basis over the life of the plan for Hounslow.
- 4.3 The trajectory includes existing commitments, deliverable and developable sites identified through the Site Assessment and Capacity work, and an element of windfall.
- 4.4 For years 2020/21 and 2021/22, 3,129 completed homes have been recorded and verified. For the five year period 2022/2023 to 2026/27 the borough anticipates a total of 9,597 completions, or an average of 1,919 per annum. The five year housing land supply is calculated in accordance with paragraph 77 of the NPPF (2023). The detailed calculation for LBH’s five year housing land supply is set out in section 6 of the Site Allocations and Capacity Assessment (2024), and for convenience is summarised in Table 2 overleaf.

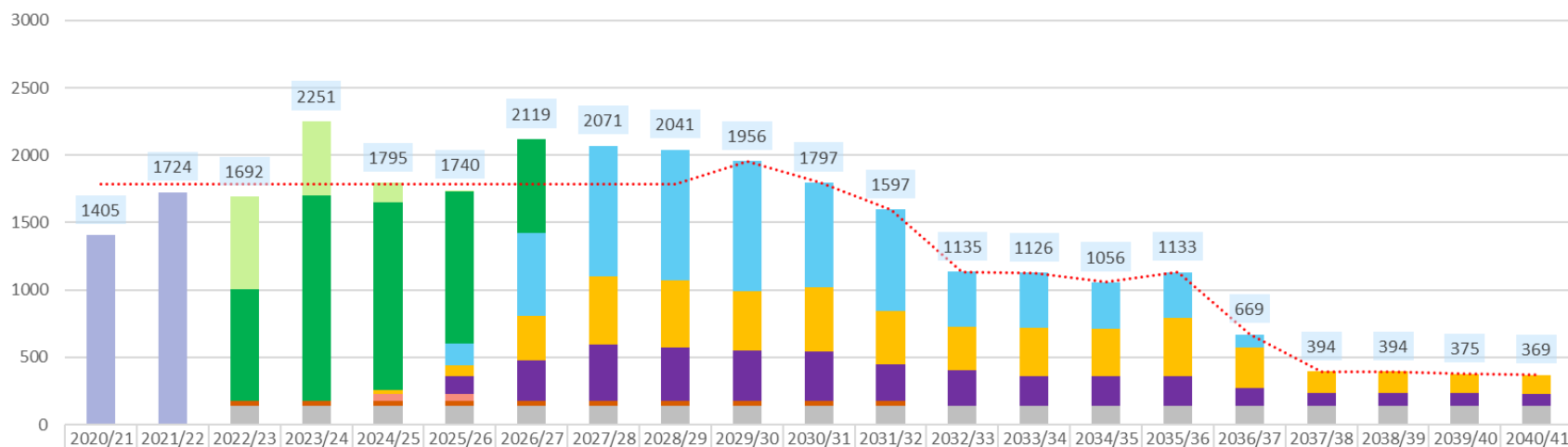
Table 2: Five-year housing land supply position – 1 April 2022 – 31 March 2027			
Stage	Calculation	Category	Figure
A		Annual Housing Requirement	1,782
B	A x 2	Plan Period Completions Required to date (2020/21 – 2021/22)	3,564
C		Plan Period Completions delivered to date (2020/21 – 2021/22)	3,129
D	B - C	Accrued deficit	435
E	D ÷ 5	Deficit annualised over 5 year period 1 April 2022 – 31 March 2027 (Sedgefield approach)	87
F	A + E	Annual housing requirement taking account of deficit	1,869
G	F x 5	Housing Requirement over 5 year period: 1 April 2022 – 31 March 2027	9,345
H		Housing Supply over 5 year period: 1 April 2022 – 31 March 2027	9,597
I	(H ÷ G) x 5	Five-year housing land supply	5.13

- 4.5 The borough's supply of deliverable sites for the five year period 1 April 2022 – 31 March 2027 is 9,597 homes. LBH is therefore able to demonstrate a five year housing land supply (5.13 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.
- 4.6 The borough's supply of 5.13 years' housing therefore also exceeds the four years' supply of housing that Hounslow is required to demonstrate, in accordance with the NPPF (2023).
- 4.7 For the ten-year period 2022/2023 –2031/32 the borough anticipates a total of 19,059 completions, or an average of 1,906 per annum. As such, the Borough anticipates that it will exceed its housing target for the next ten years of the plan period.
- 4.8 For the remainder of the plan period beyond the next 10 years, from years 2032/2033 to 2040/2041, the borough anticipates delivery of an additional 5,382 homes, though it is expected this will, over the course of time,

significantly increase through the identification of further 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*¹² for years 11-15 of the remaining plan period.

¹² LBH's emphasis added

Figure 1: Projected Housing Completions 2020-2041 by component



	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41
Net Completions	1405	1724																			
Non-Phased Pipeline Schemes			684	549	144	10															
Phased Pipeline Schemes			831	1525	1393	1129	700														
Site Allocations Great West Corridor						159	612	972	973	964	776	752	405	405	346	344	99	0	0	0	0
Site Allocations West of Borough					28	81	330	502	496	439	479	395	324	365	353	432	296	161	161	142	142
Site Allocations Rest of Borough						132	300	420	395	376	365	274	264	215	216	216	133	92	92	92	85
Estate Regeneration sites					53	53															
Other Brownfield Register Small Sites			36	36	36	36	36	36	36	36	36	36									
Windfall			141	141	141	141	141	141	141	141	141	141	141	141	141	141	141	141	141	141	141
Target(Per Annum)	1782	1782	1782	1782	1782	1782	1782	1782	1782	1956	1797	1597	1135	1126	1056	1133	669	394	394	375	369
Cumulative Target	1782	3564	5346	7128	8910	10692	12474	14256	16038	17994	19790	21387	22522	23648	24704	25836	26505	26900	27294	27669	28038
Net Projection	1405	1724	1692	2251	1795	1740	2119	2071	2041	1956	1797	1597	1135	1126	1056	1133	669	394	394	375	369
Cumulative Projection	1405	3129	4821	7072	8867	10607	12726	14797	16839	18795	20591	22188	23323	24449	25504	26637	27306	27701	28095	28470	28839



5. Delivery of Housing

Policy context

- 5.1 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)”*.
- 5.2 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 [...]”*.
- 5.3 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 [...]”*.
- 5.4 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

- 5.5 The housing trajectory shows that 28,840 new homes will be delivered over the full Plan period. Of these, it is projected that 15,600 will be delivered on site allocations – including 6,806 homes in the Borough’s Great Western Corridor, 5,126 in the West of the Borough, 3,668 in the rest of the Borough.
- 5.6 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. The housing trajectory shows that, in Hounslow, around 2,918 homes are identified for delivery on allocated sites of one hectare or less. The total of 360 homes on Brownfield Land Register which by nature comprises small sites, are all on sites on 0.25 hectares or less. The combined figure of the BLR sites and allocations of 1 hectare or less is therefore 3,278 homes which is more than 10.1% of the housing requirement over the updated plan period. This excludes the allowance for windfall sites and small sites that are pipeline sites with planning permission, which if also accounted for would result in an even greater percentage of small sites as part of the total Local Plan housing supply.
- 5.7 As such, it is demonstrated that well above 10% of the total plan period supply of 28,840 homes is located on sites of 1 hectare or less, in compliance with paragraph 70 of the NPPF.
- 5.8 With regard to the number of sites that will contribute to the London Plan small sites target of 280 dwellings per annum, it should first be noted that the definition of a small site in the London Plan (2021) is sites of 0.25 hectares or less.
- 5.9 As previously stated, the windfall allowance which is the borough’s London Plan small sites target discounted by 50% equates to 2,680 homes over the plan period. Furthermore, the Brownfield Land Register is another source of supply that comprises 360 homes, all on sites of 0.25 hectares or less. In addition, of the pipeline permissions that are included in the Housing Trajectory, a total of 1,423 homes are located on small sites of below 0.25 hectares in size. Collectively this contributes a total of 4,463 small sites of 0.25 hectares or less as part of the overall supply of sites for the Local Plan.

This would deliver 280 homes on small sites annually over almost a 16-year period.

- 5.10 LBH has therefore 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 existing permissions and the windfall allowance.
- 5.11 The steps outlined above demonstrate that Hounslow has been 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.
- 5.12 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 – 2029, and for the remainder of the plan period where the capacity based approach is applied to determine the average target of 1,000 homes per annum up to 2041.
- 5.13 LBH has applied a lapse rate to the trajectory to ensure realistic assumptions are incorporated within the Borough's housing trajectory and to provide a buffer of capacity which ensures choice and competition in the market. Following the Covid-19 pandemic, there has not been evidence to suggest that housing delivery may be suppressed in Hounslow during the plan period.
- 5.14 LBH has taken a proactive approach to brownfield land within the housing trajectory, with almost the entire supply of housing sites on brownfield land.
- 5.15 The Council adopts a realistic approach to housing delivery by taking account of planned infrastructure investment within the Borough. For example, a significant proportion of site allocations accounting for 6,806 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 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.
- 5.16 The housing trajectory was 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 Masterplan¹³ and Great West Corridor Masterplan and Capacity Study¹⁴ helped to determine the overall land use mix and housing figures for site allocations.

- 5.17 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.

¹³ Feltham Masterplan (2017)

¹⁴ Great West Corridor masterplan (2020)

