

27 April 2026



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Dear Sir/Madam,

**Hounslow Draft Local Plan (Regulation 22) Consultation – May 2026
Representations on behalf of Defence Infrastructure Organisation
MOD Feltham, Elmwood Avenue, TW13 7AH**

We write on behalf of the Defence Infrastructure Organisation (DIO) to make representations on the Regulation 22 draft Local Plan, in response to the Inspectors' Matters, Issues and Questions (MIQs) for the Stage 2 Examination Hearings, insofar as they relate to Matter 9: Site Allocations.

These representations follow the DIO's previous written submission to the Regulation 19 consultation on the draft Local Plan in October 2024, which set out a number of comments including with regards to the extent of the red-line boundary, assumptions regarding the net developable area, and requirements relating to access and open space provision.

1. Background and Site Description

The DIO is the estate expert for defence, supporting the armed forces to enable military capability by planning, building, maintaining, and servicing infrastructure. With the Ministry of Defence (MOD) owning approximately 1.5% of the UK's landmass, the DIO plays a critical role in overseeing a complex and diverse portfolio of estates.

As such, these written representations and responses to the MIQs set out by the Inspectors specifically concern Site Allocation 64 at MOD Feltham. This site extends to 12.06ha and accommodates the Defence Geographic Centre (DGC). It currently comprises predominantly non-residential specialist MoD buildings, hardstanding, playing fields and Feltham House, a dilapidated former officers' mess which is Grade II listed.

This site has been declared surplus and the closure process is well underway. The site is considered to be of strategic importance by both the Greater London Authority (GLA) and London Borough of Hounslow (LBH), with LBH's draft Local Plan allocating the site (ref. 64) for residential-led mixed-use development. A summary of this emerging allocation is provided in **Table 1** below, alongside our suggested amends.

Table 1: Key details from the draft (Regulation 22) MOD Feltham Site Allocation, with suggested amends (red text).

Ownership	Public
Site Size	44.1ha 12.06ha
Existing Use	Military Base (Sui Generis)

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Planning Designations	<ul style="list-style-type: none"> Site contains Local Open Space: development should enhance the provision of publicly accessible Local Open Space through onsite provision (see Local Plan Policy GB2); Site is adjacent to the Feltham Green and Town Centre Conservation Area. Development should conserve and take opportunities to enhance the character of the area (See Local Plan Policy CC4); Land Quality: Development will be subject to compliance with Policy EQ8 of the Local Plan and any subsequent policy in order that any contamination and any historic landfill is properly considered and addressed as part of any development; Playing Pitches: Site contains playing pitches. Development must may retain and enhance playing fields and sports pitches where feasible.
Min. development quantum	<ul style="list-style-type: none"> Residential Units: 1,370 1,000 Business (sqm): 4,340 sqm [reduced] Health/Community (sqm): 41,340 already delivered through the approved Reach Academy Hanworth Park planning application (LPA Ref: P/2024/0622)

The DIO has commissioned draft high level masterplan proposals for the site and met with LBH planning and regeneration officers in February 2026 to discuss the key planning principles which will inform the site’s future development. As part of the DIO’s engagement in the Council’s formal pre-application process, a number of detailed technical studies and reports have been commissioned. Whilst these documents are not in the public domain, we will make reference to them throughout this response where appropriate.

2. Matter 9: Site Allocations

Matter 9 of the Stage 2 Local Plan Examination seeks to consider the soundness of Site Allocation 64. The Inspector’s Questions are set out in **bold**, with our responses set out below where relevant. These responses are informed by the DIO’s progressed understanding of the site and its physical constraints based on further surveys, technical work and research undertaken in support of the pre-application process to date.

Issue: Whether the proposed allocation of sites in the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan?

Questions:

1) Are the proposed site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts?

The allocation of MOD Feltham for residential-led mixed use development is considered wholly appropriate and justified.

2) Is there any risk that any infrastructure requirements, site conditions and/or constraints might prevent or delay development or adversely affect viability and delivery of any of the site allocations?

The site is currently occupied primarily by non-residential, specialist MOD buildings, extensive areas of hardstanding, and mown grassland containing sports pitches. These are partially used for MOD recreation

purposes but remain inaccessible to the public. Existing development on the site is not dense, allowing for vehicular movement throughout. The site is secured on all sides predominantly by barbed wire topped mental fencing.

A small area of woodland is located adjacent to Feltham House, forming the main area of 'semi-natural' vegetation on site. A range of mature trees are also present across the site, however according to LBH's online records, none of these are subject to individual Tree Preservation Orders (TPOs).

Feltham House (Historic England Ref. 1189466), a Grade II listed, former officers' mess, is located within the site boundary. This building has been heavily extended with unsympathetic additions and is in a dilapidated state. It is on the Historic England Heritage at Risk Register. Its reuse and / or renovation as part of the redevelopment of the wider site will be a significant constraint given viability and its location adjacent to the newly consented Reach Academy development.

3) Are the proposed site allocation boundaries justified and effective?

The proposed boundary for Site Allocation 64 includes land no longer within the DIO's ownership so the site allocation boundary is not considered to be justified and effective.

In 2023, a 2.3-hectare parcel of land located on the western boundary of the site was sold to the Department for Education. Full planning permission for a new school ('Reach Academy Hanworth Park') has subsequently been secured (LPA Ref: P/2024/0622) and the development has been commenced.

It is therefore considered that the continued inclusion of the school site within Site Allocation 64's red-line boundary misrepresents the true net developable area and thus the development capacity of the MOD Feltham site. As such the DIO requests the site size of the allocation be changed from 14.1ha to 12.06ha, and the red line boundary be adjusted as shown at **Appendix 1**.

4) Are the assumptions regarding the capacity of the sites in terms of density of development and net developable areas justified and what are these based on?

Residential Density

The proposed minimum residential development quantum of 1,370 units for Site Allocation 64 is not considered justified. Since the preparation of the site's adopted Planning Brief (2017) which underpinned this residential quantum, development viability has been eroded by build cost inflation and the introduction of several new statutory requirements, including mandatory Biodiversity Net Gain, the Residential Property Developer Tax and the forthcoming Building Safety Levy.

Savills development advisory analysis (April 2025) concludes that achieving a minimum of 1,370 dwellings would necessitate an apartment-led scheme at a density that is misaligned with market demand in this location. Such a form of development is unlikely to attract developer interest or deliver a viable land receipt, particularly when considered against the residential sales values typically achieved in Feltham's outer London context. This challenge is further exacerbated by the heightened regulatory and associated cost burdens linked to buildings of six storeys and above.

Further, both London Plan Policy D2 and emerging LBH Local Plan Policy SC4 recognise that lower residential densities are appropriate in areas with poorer public transport accessibility. Site Allocation 64

has a PTAL score of between 1 and 3, with the majority of the site classified as PTAL 1a. In this context, the proposed residential capacity fails to respond appropriately to the site's accessibility constraints and as such, lacks a sound and policy-compliant basis.

In light of these combined viability, market and accessibility policy considerations, a reduction to the proposed minimum residential development quantum is necessary to ensure that the site allocation is justified and capable of being delivered within the plan period.

Business Floorspace

As detailed within the Savills Feltham Commercial Property Market Study (2026), it is agreed that Site Allocation 64 has the capacity to integrate a flexible mix of commercial and employment generating units, alongside residential development at the site. However, for the reasons set out below, it is considered that local market demand does not support the delivery of any significant quantum of standalone business/commercial floorspace beyond that required to meet the day to day needs of new and existing residents.

As identified in this market study, Feltham's retail market is concentrated on the High Street, which already contains numerous established retail anchors. Against this context, any retail provision across Site Allocation 64 should be limited to small-scale, local convenience stores to serve new and existing residents. The site's physical distance and limited permeability to the High Street further reduces the scope for a retail offer beyond a more ancillary provision.

This position is reinforced by the site's poor accessibility to public transport, as reflected by its PTAL rating of between 1-3. The limited connectivity and reliance on private modes of transport significantly constrain the site's ability to support larger-scale or destination retail uses.

Regarding office and co-working provision, the Savills Commercial Property Market Study (2026) identifies an absence of a cohesive office market within Feltham and finds little evidence to support the delivery of new office floorspace of any substantial scale. The area does not currently accommodate any established commercial co-working operators, and there is no demonstrable occupier demand to justify the inclusion of a sizeable co-working or office component within the site.

Overall, this evidence highlights that Site Allocation 64 does not support office, co-working or large-scale retail provision. As such, a reduced quantum of business floorspace is considered appropriate for the site to assist with successful placemaking and have regard to Feltham's local demand.

Health / Community Floorspace

On the basis of the continued inclusion of the school site within the site allocation's red-line boundary, the minimum community floorspace requirement of 11,310 sqm is not justified.

The allocation fails to recognise that a substantial proportion of this requirement has already been delivered through the permitted Reach Academy Hanworth Park scheme (LPA Ref: P/2024/0622), which provides 11,143 sqm of community floorspace and was approved after the allocation was drafted. As a result, we do not consider there to be a further requirement for any health / community floorspace within the revised red line boundary of the site allocation, and therefore request that the allocation be updated to acknowledge the provision already secured.

Sports Pitches

It was previously noted in the DIO's Regulation 19 representations that it may not be feasible to retain the sports pitch provision on-site and that it may be more appropriate for any mitigation to be delivered through off-site contributions to nearby facilities.

Since these representations, Tetra Tech's Recreation and Open Space Study (2026) has confirmed that proposed Site Allocation 64 does not require on-site sports pitch provision. It confirms that the existing pitches are fenced off and inaccessible to the public, such that their removal would not result in the loss of publicly available provision. It must also be noted that there are three publicly accessible sports pitches within 1km of the site, alongside the additional facilities to be delivered through the adjacent consented school development.

This position has been acknowledged through pre-application discussions with LBH where it was recognised that the loss of on-site pitches may be necessary and that they were 'likely to agree' with these conclusions of Tetra Tech's aforementioned study.

As such, the DIO requests that Site Allocation 64 adopts a more flexible and evidence-led approach, reflecting the viability and availability considerations outlined above. It is proposed that the allocation wording be amended to remove the prescriptive requirement for on-site provision, such that development may retain and enhance playing fields and sports pitches, where feasible.

5) Are the expected timescales for development in terms of lead in times and annual delivery rates for each site allocation, realistic and supported by evidence?

We do not have any concerns with the expected timescales for delivery.

6) Does the Plan sufficiently make clear the infrastructure requirements for each of the allocated sites, together with the timing of and dependencies upon such infrastructure for their delivery?

The DIO continues to engage proactively with Transport for London (TfL) and LBH in relation to strategic infrastructure matters affecting the site, including access, connectivity and movement considerations. The DIO expects further clarity through Site Allocation 64 regarding the extent of LBH's support for infrastructure improvements to improve permeability and an uplift to the site's poor existing PTAL rating.

7) Are the proposed allocations and the associated development requirements identified in Chapter 12 of the Plan - justified, effective, consistent with national policy and in general conformity with the London Plan?

Site Allocation 64 does not meet the tests of soundness set out in NPPF paragraph 36 as it is not justified by proportionate and up-to-date evidence. In particular, the assumed residential development quantum is derived from the 2017 Planning Brief and no longer reflects significantly altered viability conditions, increased development costs, nor the impact of new statutory requirements.

London Plan Policy D2 requires development density to respond to a site's accessibility to sustainable transport. Given that Site Allocation 64 is characterised by low public transport accessibility, with a PTAL rating predominantly of 1a, the scale and intensity of development proposed are overestimated and not

accessibility-led. As such, the allocation is not in general conformity with the London Plan and cannot be considered justified or effective.

8) Are any modifications required to ensure that the individual site allocations and/or their development requirements identified in Chapter 12 of the Plan are accurate and sound?

1. The site allocation boundary should be amended to remove the land parcel no longer within the control of the DIO, namely the northern segment sold to the Department for Education in 2023, now subject to the consented Reach Academy school development.
2. The site area should be reduced from 14.1ha to 12.06ha in size.
3. The proposed minimum residential development quantum (1,370 units) should be reduced to circa 1,000 units to reflect up-to-date viability evidence, market conditions and the site's low PTAL rating.
4. The minimum business floorspace quantum (4,340 sqm) should be reduced to reflect Savills' research demonstrating that the commercial demand is very modest.
5. The minimum community floorspace quantum (11,310 sqm) should be updated to reflect the substantial quantum already delivered on this allocation through the permitted school development (LPA Ref: P/2024/0622).
6. The requirement for the retention of on-site sports pitches is amended to adopt a more flexible approach, allowing for their removal where necessary to support viability, with appropriate off-site mitigation or contributions to nearby sports provision where justified.
7. The addition of clearer and more explicit recognition of the Council's role and commitment in supporting infrastructure and connectivity improvements, including measures to enhance permeability and public transport accessibility.

9) Policy P2(c) relates specifically to Land at Hatton Fields, without prejudice to our consideration of evidence and previous discussions that took place as part of Matter 4, are the requirements of development proposals in that policy, justified, effective, consistent with national policy and in general conformity with the London Plan 2021?

N/A.

3. Conclusion

We trust that these representations will be given full consideration at the upcoming Examination in Public. We have registered to participate at the hearing sessions relating to Matter 9 (Site Allocations) and Matter 10 ('delivering the identified requirements over the plan period (housing and employment)') but reserve the right to attend in an observational capacity only, unless the Inspectors have any specific queries in relation to this submission.

Should any further information be required in advance of the Examination in Public, please feel free to contact me or my colleague, Diana Thomson (dthomson@savills.com).



Yours faithfully,

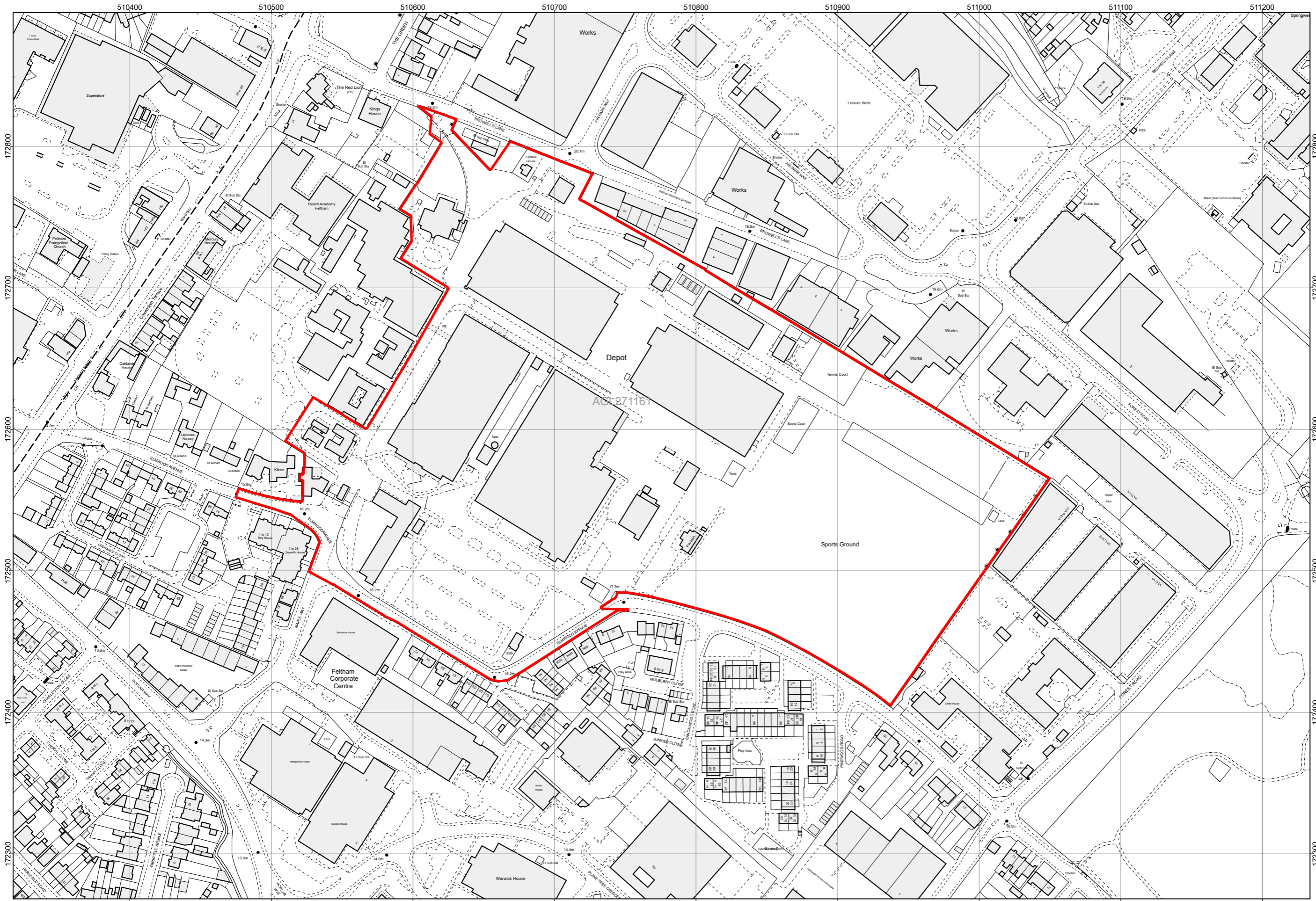
A handwritten signature in black ink, appearing to read "M. McNulty".

Matthew McNulty
Savills Planning

Enc. As above

Appendix 1

DEFENCE GEOGRAPHIC CENTRE FELTHAM DISPOSAL PLAN



KEY
MOD Registered Land 12.06 ha

