

Matter 10: Delivering the Identified Requirements over the Plan Period

The responses below are prepared by Berkeley Strategic in relation to Matter 10 of the Hounslow Local Plan examinations, following on from previous submissions and statements. As most of the questions are directed at the Council, only selected questions are addressed.

Whilst Berkeley support the direction of travel of the draft Local Plan, we consider at present that the Plan is 'unsound' and requires additional sites to be released (including appropriate sites for release within the Green Belt) as part of LBH demonstrating that it can meet its housing need across the lifetime of the Plan, as allocated to Hounslow by the London Plan, to ensure that it is justified and effective.

Question 4 - Is the most up-to-date version of the housing trajectory realistic? Is there sufficient evidence to demonstrate a sufficient supply of deliverable sites (in years 1 to 5) and developable sites (in years 6 to 15) to ensure that the Plan's housing requirement for the Borough would be met?

In terms of years 1 – 5, LBH's published position (as March 2026) is that it has a housing supply of 5.46 years (calculated based on NPPF 2023) or 5.2 years (calculated based on NPPF 2024). This has been calculated using a 5% buffer, relying on a Housing Delivery Test 2023 score. Whilst no new Housing Delivery Test has been formally published, the Council's evidence base indicates that this score does not reflect the latest position.

The Updated Housing Trajectory and Completions published in March 2026 reveals 4,057 completions in the three years 2022/23 – 2024/25, which equates to a 75.9% HDT score. With a potential HDT score below 85%, a 20% buffer would need to be applied to the five-year housing supply. This would equate to a target figure of 13,493 homes (based on the London Plan 2021 targets) and a housing land supply below five years.

In terms of years 6 – 15, the majority of housing delivery is concentrated in the next ten years of the plan period (2025–2035). Projected delivery falls to approximately 990 dwellings per annum in the final six years (2035/36–2040/41), which raises a concerns about the balance of supply across the full plan period. This issue was raised previously by Berkeley as part of previous representations to the examination.

In terms of delivery, it is noted that the Borough has not exceeded 1,682 dwellings in a single monitored year during the plan period to date. The trajectory assumes delivery of 2,456 dwellings per annum in years 2025/26–2029/30, which represents a significant step up from recent performance.

A more effective approach would seek to increase supply of housing sites which are capable of being delivered over the medium and longer-term to distribute growth more evenly across the plan period, including considering the potential for additional allocations and selective Green Belt release.

In this context, Berkeley has consistently promoted land off Bedfont Road, Feltham, which is considered to be 'grey belt' (as per the definition in the NPPF). The Site is suitable for release from the Green Belt and is capable of delivering approximately 700 - 1000 homes, including affordable housing. Its allocation would make a significant contribution towards meeting LBH's housing requirement and is capable of being delivered during the plan period to 2041.

In addition to the above, few of the draft allocated sites identified to deliver within the first five years of the plan period benefit from detailed (or any) permission, and no clear evidence has been provided to confirm that housing completions will begin on site within five years. Due to this, very few draft allocations can be considered deliverable per the definition in Annex 2 of the NPPF.

Lichfields 'Start to Finish' Report (March 2024) outlines that only sites of 99 dwellings or fewer can, on average, be expected to deliver dwellings within five years from validation of a planning application. Therefore, at least eight sites identified as draft allocations are unlikely to deliver dwellings within the first five years of the plan period, reducing the five year supply by 1,852 dwellings. As such, insufficient specific sites have been identified to deliver housing early in the plan period, as required by paragraph 72a of the NPPF. Additional sites should therefore be identified to meet housing needs in years 1–5 of the plan period, and potentially in later years.

Question 8 – Is there reasonable confidence that a 5-year supply would be maintained throughout the Plan period? If not, how could this be achieved?

On the basis of the published trajectory and HDT performance, LBH is currently unable to demonstrate that it would be able to maintain a rolling 5-year supply.

The 5-year requirement appears to be out of date in that it does not apply a sufficient buffer (as set out under Question 4) and the requirement is based the London Plan figure up to 2029 which is itself now out of date (more than five years old). We note that LBH have acknowledged in their Statement of Common Ground with the GLA (para 4.5.7) that:

“LBH reiterated that the approach to housing need follows the approach set out in paragraph 4.1.11 of the London Plan (2021) and noted the future housing need which will be apportioned through the new London Plan. Both parties acknowledged this might mean the draft Local Plan will need to be reviewed following the publication of the Draft new London Plan.”

As set out above, LBH are not currently able to demonstrate a sufficient supply of homes to meet their 5-year requirement (with appropriate buffer) and the trajectory shows delivery falling to below even current London Plan requirements in the latter period of the draft Plan. Given this and that the housing targets in the emerging London Plan are likely to significantly increase (from the current 52,000 to 88,000 new homes per annum), the lack of sites in the draft Plan, undermines the Plan's efficacy in meeting its historic under-delivery and future housing needs. In this context, there cannot be reasonable confidence that LBH would be able to maintain its 5-year supply during the Plan period.

In order to achieve this, it will be essential that additional sites are released in order to ensure that the Plan is both effective and justified as part of the overall test of 'soundness'.

This should include the release and allocation of suitable Green Belt sites for residential development.

Question 10 - Is there a sufficient range and choice of sites allocated in the Plan in terms of location, type and size, to provide adequate flexibility to meet the housing requirement in the Plan?

No. Berkeley acknowledges the range of sites identified in the Plan across the Great West Corridor, West of Borough and Rest of Borough areas. However, the allocation portfolio is heavily weighted towards a small number of large, complex strategic sites. This concentration introduces delivery risk – if one or more major allocations experiences delay, there is insufficient depth in the remaining supply to compensate.

The Plan's reliance on brownfield intensification, whilst supported in principle, limits both the range of housing typologies that can be delivered and the Plan's ability to respond flexibly should delivery assumptions not be met. Brownfield sites frequently present viability challenges that constrain affordable housing delivery and provide limited scope for familysized homes. There is also a notable absence in the supply of mid-sized residential allocations to provide a buffer should any of the larger strategic sites experience delay - a risk that becomes particularly acute in the latter years of the plan period when, as noted in response to Question 4, projected delivery falls to approximately 990 dwellings per annum as the brownfield pipeline exhausts itself.

The identification of additional supply in the form of strategic green belt release would help maintain delivery in the longer term and provide the flexibility and housing mix the current portfolio lacks. As above, Berkeley's land at Bedfont Road, Feltham is suitable for release from the Green Belt and could make a meaningful contribution to supply in the medium to longer term.

Question 11 - Would the housing allocations ensure that the Plan would be consistent with the Framework, in so far as it seeks to boost significantly the supply of housing?

No. Berkeley considers that the housing allocations only partially ensure consistency with the Framework's objective of boosting significantly the supply of housing.

The allocations support a reasonable level of delivery in the near to medium term, with the trajectory (EX44g) projecting 2,456 dwellings per annum in the period 2025/26–2029/30, and this is acknowledged. However, projected delivery falls to approximately 990 dwellings per annum in the final six years of the plan period (2035/36–2040/41) as the brownfield allocation pipeline exhausts itself. The Framework's objective of boosting significantly the supply of housing requires a sustained approach throughout the plan period, not solely in its earlier stages, particularly given the context of the London Plan itself now being out of date in terms of its housing requirement.

Whilst the brownfield regeneration approach is welcomed, it is not considered sufficient on its own to meet the longer-term housing needs of the Borough. The allocation portfolio, by its nature, is also unlikely to provide the variety of housing types and tenures required to meet the full range of identified need - in particular family-sized homes, which are more readily delivered on greenfield sites at appropriate densities.

The identification of additional supply in the form of greenfield allocations at sustainable locations, including land off Bedfont Road, Feltham, capable of delivering approximately 700 – 1000 homes including affordable and family housing, would help ensure a meaningful and sustained level of delivery is maintained in the latter stages of the plan period, strengthening the Plan's overall consistency with the Framework's objective to 2041.

An approach which identifies additional supply now would 'bridge the gap' between the now out of date London Plan housing requirement and the forthcoming new London Plan that

needs to fully address housing need, including considering the potential of suitable land in the Green Belt.

Question 14 - In overall terms, would the Plan realistically deliver the dwellings required in the Borough over the Plan period?

In overall terms, Berkeley considers that the Plan would face challenges in realistically delivering the dwellings required over the full plan period. The concern is not solely one of quantum - it is about the timing and resilience of delivery across the plan period as a whole.

The allocation portfolio is almost entirely brownfield in nature. Whilst a brownfield first approach is supported, the brownfield sites are front-loaded in their delivery. As the trajectory (EX44g) demonstrates, projected delivery falls to approximately 990 dwellings per annum in the final six years of the plan period (2035/36–2040/41), well below even the current annual requirement.

Furthermore, as noted previously the Plan has been prepared against London Plan 2021 housing targets that are now more than five years old. As set out above, the Council's own Statement of Common Ground with the GLA acknowledges that the Plan will need to be reviewed following publication of the draft new London Plan.

The London Plan 2021 housing targets were based on a capacity-led approach rather than a needs-based approach, and so did not reflect actual local housing needs, resulting in an under provision of sites. This was highlighted ahead of its adoption in a letter from the Secretary of State for Housing, Communities and Local Government to the Mayor of London (dated 13 March 2020) and recently noted by the Mayor of London as out-of-date (Greater London Authority representations to Camden Regulation 19 Local Plan, dated 12 June 2025).

Although additional sites could be identified following the exercise completed in the preparation of the London Plan, the prepared use of this target as the housing requirement in the emerging Hounslow Local Plan makes limited provision for these to come forward.

In recognition of the shortfalls of the approach of the previous London Plan to understanding local housing need and setting housing requirements for each Borough, the emerging London Plan will use the Standard Method to determine local housing need, as indicated in the 'Intention to Publish' consultation document (dated 13 March 2025). The next London Plan is expected to be adopted in 2027, following quickly after the anticipated adoption of Hounslow's emerging Local Plan, and so Hounslow's Local Plan housing requirement will quickly become out-of-date.

Although the transitional arrangements outlined in Annex 1 of the NPPF allow the emerging Hounslow Local Plan to progress using the current London Plan housing targets rather than the Standard Method, there is sufficient evidence to indicate that this Plan will not deliver the borough's housing needs.

A letter from the Secretary of State for Housing, Communities and Local Government to the Chief Executive of the Planning Inspectorate, dated 9 October 2025, states that plans should be allowed to proceed to adoption where they "significantly boost supply and still meet housing needs over the plan period." This indicates that while the Plan should plan for at least the London Plan target, it must also be positively prepared (as required by the test of

soundness outlined in paragraph 36 of the NPPF) and should reflect the higher level of need indicated by the Standard Method.

In addition to the above, Berkeley considers that a plan which delivers strongly in the first ten years but falls away materially in the latter stages, and which has been prepared against a requirement that is already out of date and about to be superseded, cannot be said to realistically deliver the dwellings required over the plan period in full.

It is noted that the Council previously set out a more ambitious strategy that included the release of Green Belt land in the West of Borough area at Bedfont Lakes near Berkeley's site. It remains unclear why the consolidated plan (subject of the examination) has abandoned these proposals when the Council previously considered that housing needs constituted exceptional circumstances to justify the release of Green Belt land.

The identification of strategic greenfield allocations, including land off Bedfont Road, Feltham, capable of delivering approximately 700 – 1000 homes including affordable and family housing, would provide a meaningful contribution to supply at precisely the point the trajectory requires it most and help ensure the Plan remains resilient in the face of rising housing need.