



Quod

Matter 10 – Housing Delivery

Hounslow Local Plan

St James Group Ltd

27TH APRIL 2026

1 Introduction & Summary

- 1.1 As required by the Framework, St James Group Ltd ('St James') (part of the Berkeley Group) has invested time in early, proportionate and effective engagement with the Hounslow Local Plan Review to help ensure the Plan is positively prepared, deliverable and clearly written.
- 1.2 Quod, on behalf of St James, prepared and submitted hearing statements for Stage 1 Matters 1 (Legal Compliance), 2 (Spatial Strategy), 3 (Housing Need), 4 (Employment and Retail), 6 (Viability), 7 (Green Infrastructure) and 8 (Design and Tall Buildings).
- 1.3 Quod and St James attended the examination hearings and supplemented our written evidence with oral representations.

Summary

- 1.4 St James' Matter 3 Hearing Statement (WS3.4) considers the Council's stated Five Year Housing Land Supply (5YHLS). We welcomed the Inspectors' requests for further information on this issue, and this has resulted in further information and clarifications from the Council. It has also given rise to soundness concerns summarised below.

5YHLS

- 1.5 Cumulatively there are several reasons why we believe that the Council's updated 5YHLS position is overstated, and once the correct period is assessed, we believe that Hounslow is unable to robustly evidence a robust 5YHLS.

Housing Completions

- 1.6 The Council's additional evidence document EX44h¹ confirms historic Council error in housing completion reporting. It has overstated housing completions for each of the last six years between 2019/20 and 2024/25, overall, by 22%. This increases the housing shortfall to 2,334 homes.

HDT / Buffer

- 1.7 We welcome confirmation as to how this shortfall has affected the Council's Housing Delivery Test (HDT) performance, and any associated implications for 5YHLS calculations in line with the Framework.
- 1.8 Based on the Council's completion data presented at Table 1 of EX44h, this would equate to a HDT performance for 2021/22-2023/24 of 76%; and 76% for 22/23-24/25.
- 1.9 Paragraph 77 of the Framework (December 2023), footnote 43 states that the 20% buffer applies where the HDT indicates that delivery was below 85% of the housing requirement.

¹ EX44h: 1.15 and Table 1

- 1.10 The Council has not applied a 20% buffer², but if this were correctly applied to Table 5 of EX44h, it would only be able to demonstrate a 4.55-year supply of housing land.

Deliverable Homes

- 1.11 The Council's updated housing trajectory evidence does not appear to have correctly applied the definition of *deliverable* to some of its major Site Allocation schemes, counting homes that cannot reasonably be delivered between 1st April 2025 – 31st March 2030.
- 1.12 This would apply to at least 2,305 homes, which if discounted would reduce the Council's housing supply to circa. 4.43 years supply (0% buffer); 4.22 years (5% buffer³); and 3.7 years (20% buffer⁴).

Housing Trajectory

- 1.13 The Council has issued an updated Figure 1 Housing Trajectory - Projected Housing Completions 2020-2041 by Component (EX44h) and Housing Trajectory and Completions (EX44i).
- 1.14 The Council's assumed build out rates have more than doubled since publication of EX7, and are presented at rates not supported by robust evidence, and to which the cited scheme sample has not been available to the public.
- 1.15 The Council's housing trajectory assumes housing delivery (25/26 to 29/30) of 1,750; 2,559; 2,364; 2,847; and 2,759 dpa. These represent completions rates never achieved in Hounslow, and it therefore seems a wholly unrealistic and ineffective assumption when London is experiencing the 'perfect storm' resulting in a catastrophic reduction in housing starts and completions, as evidenced by the London DataHub starts and completion database and Molior.
- 1.16 Figure 1 of EX44h forecasts that in 2025/26, the Council will deliver 1,750 dwellings. However, as the year is now complete, we can draw down actual data against which Molior record only 777 completions (a difference of 77%) and a shortfall of 1,005 homes on Hounslow's London Plan housing target (1,782dpa). This shortfall should be included as part of the rebased 5YHLS assessment from intended adoption (2026-2031).

Modifications for soundness

- 1.17 To rectify the above, the Council should embed the presumption in favour of sustainable development into its emerging Local Plan, recognising the sustained housing shortfall.
- 1.18 As its 5YHLS assessment is based on housing requirements drawn from the London Plan, which itself is now out of date being more than 5 years old⁵, it should commit to an immediate review following adoption of the new London Plan to which, the Borough's housing figures are expected to increase.

² EX44h: Table 4 Row H = 13,493 homes

³ Paragraph 78a of the Framework (December 2024)

⁴ Paragraph 79 of the Framework (December 2023)

⁵ Paragraph 33 of the Framework (December 2023)

- 1.19 We note that paragraph 77 of the Framework states that “*The supply should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old*”⁶”.
- 1.20 We would welcome clarification as to whether this applies here, and therefore whether the London Plan figure of 1782dpa should be replaced with the standard method figure of 2,052dpa.

⁶ Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance.

2 Matter 10: Housing Delivery

Q3 - What informed the assumptions about the scale and timing of supply in relation to build-out rates and lead-in times from these various sources? Are these realistic and based upon up-to-date evidence?

- 2.1 Overall, we are concerned that the assumptions made by the Council in respect of build out rates and lead-in times are not effective, and are neither realistic nor deliverable.
- 2.2 As shown at Table 1, the Council’s evidence base has changed significantly in the 6 months period between publication of EX7 (September 2025) and EX44h (March 2026) with built-out rates inexplicitly doubling in the last six months. This is despite London’s housing starts and completions collapsing over this period.

Table 1 - Comparison of assumed build-out rates presented in EX7 and EX44h

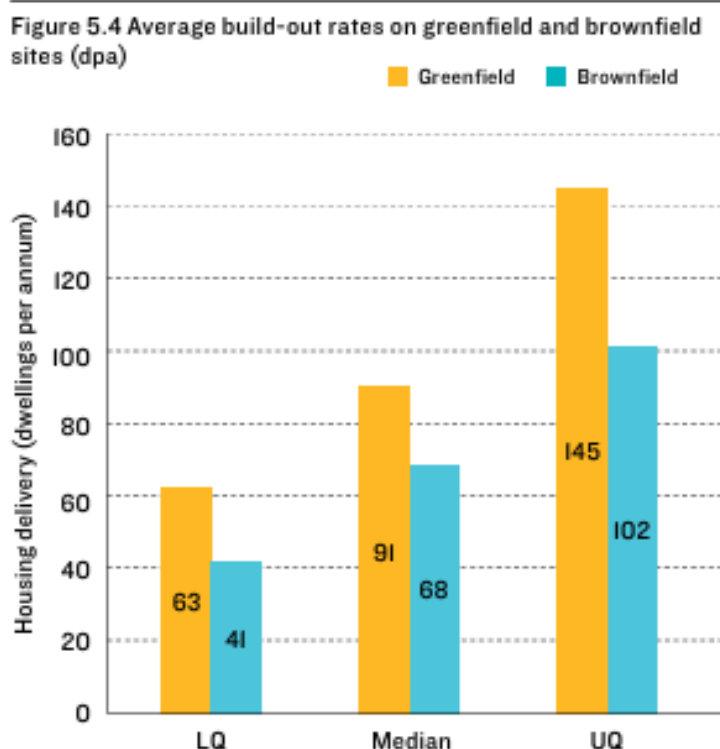
	EX7 (Sept 2025)	EX44h Table 6 (March 2026)	Difference
100–499 units ('large')	60 dpa	154 dpa	+94 dpa (x 2.6)
500+ units ('very large').	83 dpa	198 dpa	+ 115 dpa (x 2.4)

- 2.3 The Council’s build-out rate assumptions inform the Council’s Housing Trajectory (EX44i) and subsequently its five-year housing land supply (5YHLS). They are therefore fundamental to the soundness of the Plan.
- 2.4 We understand that the build-out rate assumptions in EX44h are informed by a sample of 17 large and 4 very large sites delivered in Hounslow during the current plan period⁷. As this sample has not been published, it is not possible to verify or interrogate the underlying evidence.
- 2.5 Quod requested that the sample of 21 schemes that have informed the build-out rate assumptions be provided by the Council on 16th April 2026, but at time of preparing this Statement, they have not yet been provided.
- 2.6 In any event, we understand that the sample is drawn from schemes completed within the Plan Period (i.e. 2020–2025), which given the lead in times of constructions is unlikely to reflect recent macroeconomic conditions and regulatory requirements, and may therefore not be representative of the challenges now facing residential development in London.

⁷ EX44h – Paragraph 2.29

- 2.7 Paragraph 2.31 at Table 6 of EX44h, refers to the Lichfields 'Start to Finish' (March 2024) report to support of its construction lead in, build out, and completions assumptions.
- 2.8 Firstly, it must be recognised that the Lichfields' report excludes London data *"because of the distinctive characteristics of housing development in the capital"*.
- 2.9 Notwithstanding, the Lichfields' report clearly states that completion rates vary significantly depending on site and market conditions, citing that *"Worsening market conditions will likely markedly reduce build-out rates"*⁸. A small number of high-performing schemes therefore has the potential to skew results to which Lichfields' rely on a sample set of 179 large sites, compared to the 21 schemes cited in EX44h.
- 2.10 Secondly, even when allowing for a non-London context, the evidence points to a brownfield build out rate of 68dpa, or an upper quartile of 102dpa. A substantial delta between the figures adopted by the Council of 154dpa to 198dpa.
- 2.11 Thirdly, the Lichfields' evidence base is informed by development data up to April 2023. This predates the introduction of the Building Safety regulatory regime and the Gateway 2 process (effective from October 2023), which has materially extended lead-in times and introduced additional delays to implementation and completion for schemes comprising Higher Risk Buildings (i.e. those exceeding 6 storeys or 18m).

Figure 1 - Lichfields' Start to Finish (March 2024)



- 2.12 While higher outputs may be achieved in certain years, these are rarely sustained over the lifetime of a development, or Development Plan period. Furthermore, large sites typically

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require several years to reach peak delivery and do not build out at a constant rate. The assumption that larger sites will consistently deliver higher annual outputs is not supported by evidence and risks overstating delivery, particularly in weaker market conditions.

- 2.13 The trajectory also fails to adequately account for market absorption, which is the primary constraint on delivery, and which currently is at a low, without signs of improvement.
- 2.14 Overall, overly optimistic build-out rates assumed by the Council do not reflect how development is delivered in practice. As a result, the Housing Trajectory (EX44i) and associated 5YHLS position are likely to be overstated and should be revised.

Q4 – Is the most up to date version of the housing trajectory realistic?

Housing Target (dpa)

- 2.15 The Council's Updated Housing Trajectory (EX44i) aligns the housing target for the initial five-year period (25/26–30/31) with the adopted (now out of date) London Plan requirement of 1,782 homes per annum.
- 2.16 Beyond 2030 (30/31 to 40/41), EX44i applies an average of 1,524dpa which is less than the London Plan capacity figure⁹ (1,782dpa) and less than the Standard Method (2,052 dpa). This is not positive and will not effectively meet housing needs.
- 2.17 EX7 justifies this approach by relying on paragraph 4.1.11 of the London Plan and the 2017 SHLAA to establish a residual target of 12,000 homes between 2029/30 and 2040/41. This approach is inconsistent with the Mayor's position, who has confirmed that paragraph 4.1.11 of the London Plan is "*now considered out of date*"¹⁰ and should not be relied upon to inform housing targets beyond 2029.
- 2.18 For Hounslow, the Mayor has advised the Council¹¹ to "*roll forward*" its current borough housing targets beyond 2029/30, including any shortfall accrued to date, and to continue to take proactive measures to increase housing supply.
- 2.19 The justification for the Mayor's approach is that the current LP2021 housing targets were derived from a capacity basis rather than a needs basis¹², and consequently, it under-provides for London's actual assessed housing need.
- 2.20 While the Council explains in EX7, it is not required to adopt the Standard Method under the transitional arrangements (Annex 1 of the Framework), and is only required to be in 'general conformity' with the London Plan (2021) where a Regulation 19 Local Plan was issued on or

⁹ This was reinforced by the Secretary of State's position at the time of adoption of the London Plan, which identified that the Mayor's capacity-based target of 42,000 homes per annum fell significantly short of the assessed need of 65,000 homes per annum, particularly in addressing affordability pressures. The Mayor has since sought to correct this through the Towards a New London Plan consultation (May 2025), which proposes a target of 88,000 homes per annum across London

¹⁰ GLA representations to Camden R19 Local Plan, 12th June 2025

¹¹ Statement of Common Ground with Hounslow Council (EX5e), page 8

¹² Letter from Secretary of State for Housing, Communities and Local Government to the Mayor of London - Intention to Publish version of the London Plan (dated 13th March 2020)

before the 12th March 2025, or where there is ‘an operative’ Spatial Development Strategies in place (e.g. the London Plan); despite this legislative arrangement, there is a clear and significant strategic issue which requires the Inspector’s consideration and encouraged intervention.

- 2.21 It is morally wrong and ineffective for a new Local Plan in 2026 to not meet housing needs and simply ‘kick the issue down the road’, making a challenging housing affordability climate, worse.

Review

- 2.22 We consider that the Council should commit to undertake a future review of its Local Plan once the new London Plan is adopted.
- 2.23 In this respect, the Ealing Local Plan which was subject of examination in 2025 under the same transitional arrangements has committed to undertake a comprehensive review of its Local Plan by the end of 2027¹³. The relevant text is set out below.

1.40 A new draft London Plan is also expected to be published for consultation in Summer 2026 which will set new targets on LPAs including for housing supply and gypsy and traveller pitches. The London Plan is not expected to complete its examination and thereafter be published until the end of 2027, at the earliest.

1.41 Given these important changes the council will undertake a comprehensive review of the whole Ealing Local Plan 2024-2039 by the end of 2027. This will determine whether this plan needs to be updated either in whole or in part.

1.42 All policies will be reviewed but with particular regard paid to the following matters that have been specifically identified during the preparation and examination of this plan:

- *The housing requirement for the whole LPA and consideration of proposed housing requirement set out in the new London Plan (if this has been published).*
- *Monitoring housing delivery including the progress and implementation of sites allocated in this plan to inform the Local Plan review.*
- *Gypsy Traveller and Accommodation Assessment, in accordance with the Statement of Common Ground agreed with the Old Oak and Park Royal Development Corporation (OPDC).*

Projected Housing Completions 2020-2041

- 2.24 Figure 1 of Ex44h projects average net completions of 2,455 homes per annum (12,279 homes in total) over the period 25/26–30/31.
- 2.25 This represents a 69% increase on the five-year average (2020–2025) of 1,445 homes.

¹³ Ealing Local Plan – EX36.6

- 2.26 Such a substantial uplift in housing delivery is not credible when considered against historic trends, the corrected completion rates (reduced by c.700 homes in Table 1 of EX44h), and the current economic climate which has seen a record low in housing starts.
- 2.27 Figure 1 assumes the projected delivery of 1,750 homes in 2025/26, but actual data indicates only 777 completions¹⁴, a shortfall of 1,005 homes against Hounslow's housing target (1,782dpa).
- 2.28 The credibility of the completion projections is further undermined by current market conditions, which continue to inhibit scheme starts, developer confidence, and undermined further by the draft Plan, which reduces housing capacity on key site allocations, and introduces a range of policy requirements that inhibit housing delivery and viability including prescriptive design codes and supplementary guidance, £370/tCO₂ carbon offset for major development, continued reliance on an outdated Whole Plan Viability Assessment assumptions, which, when taken together appear more focused on controlling development than facilitating it.

Q5 – Would the Plan realistically provide for a 5-year supply of specific deliverable sites on adoption?

- 2.29 In our Matter 3 (Meeting the Borough's Housing Need) Hearing Statement, we raised concerns regarding the robustness of the Council's five-year housing land supply (5YHLS), and the associated housing trajectory, which at that stage was not supported by a detailed annualised breakdown of each contributing schemes.

Start date for 5YHLS

- 2.30 We also highlighted concerns in respect of the Council's approach in demonstrating a 5YHLS in accordance with paragraph 69a of the Framework, which requires supply to be calculated from the "*intended date of adoption*".
- 2.31 We welcome the Council's updated 5YHLS Position (EX44i) and detailed trajectory (EX44h), which now covers the period April 2025 to March 2030 (2025-2030). EX7 previously covered the 5 year period between 2024-2029.
- 2.32 At the Stage 1 examination in public, the Council explained the limitation in presenting a 5YHLS from the intended adoption date noting that the calculation of any deficit is informed by the latest Housing Delivery Test (HDT) dataset, which have not been published since December 2024.
- 2.33 The 2025/26 performance and any subsequent deficit should be accounted for when the Council rebases its 5YHLS position to reflect a five-year period from the intended date of adoption (i.e. 2026-2031).
- 2.34 While it will be for the Inspectors to determine whether this justification is acceptable in view of the Framework and PINS guidance¹⁵, it is notable that, in the recent examination of the

¹⁴ Molior – Construction Completions: Hounslow 2025

¹⁵ PINS - Local Plans Pre-Examination Checklist (September 2025)

Newham Local Plan this year, the Council was able to present a 5YHLS position from the intended adoption period (2027–2032) at the Inspector’s request.

HDT

- 2.35 We note and welcome that the Council has provided its housing completion data for the period between 2022-2025¹⁶. This information will inform the next publication of HDT dataset.
- 2.36 Using the EX44h completion data for the period 2022/23-2024/25, we provide an up-to-date HDT assessment at Table 2, which demonstrates that the Council has only achieved a 76% result.
- 2.37 This position will worsen further once the anticipated fall in housing completions in 2025/26 has been factored in.

Table 2 - EX44h Housing Completions (2022-2025): Interim Housing Delivery Test Performance

Number of homes required			Total homes required	Number of homes delivered			Total homes delivered	Housing Delivery Test measurement	Housing Delivery Test: consequence
2022-23	2023-24	2024-25		2022-23	2023-24	2024-25			
1782	1782	1782	5346	1200	1175	1682	4057	76%	Buffer

- 2.38 Paragraph 77 of Framework states that where a HDT performance drops below 85%, a 20% Buffer should be added to its 5YHLS requirement.
- 2.39 We note at Paragraph 1.22 of EX44h that the Council has discounted application of the 20% Buffer on the basis that *“the most recent Housing Delivery Test results (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”*.
- 2.40 The Council is referring to the 2023 HDT results published late in December 2024, for the period 20/21-22/23. This is disingenuous, as this data precedes the adopted London Plan, and the Council has since updated its completion data for 2022-2025¹⁷, which will inform the forthcoming HDT.

5YHLS

- 2.41 Table 3 of EX44h sets out the Council’s position identifying a housing requirement of 11,244 homes over the five-year period (including the accrued deficit of 2,334 homes between 2019-2024 (389dpa or 22% annual target), against which it forecasts a supply of 12,279 homes.
- 2.42 This equates to a 5.46-year housing land supply, with the majority of housing supply derived from phased pipeline permissions (5,867 homes) and Site Allocations (3,683 homes).
- 2.43 In achieving its housing requirement, the Council would be required to deliver at an annual rate of approximately 2,249 homes per annum across 2025 and 2030.

¹⁶ EX44h: Table 1 - Net Housing Completions by Monitoring Year

¹⁷ EX44h: Table 1 - Net Housing Completions by Monitoring Year

- 2.44 When applying a 20% Buffer to the Council’s 5YHLS, this would increase Hounslow’s housing supply requirement to 13,493 homes (=2,670dpa), which would represent a 4.55-years supply of land based on the Council’s identified housing supply (12,279)¹⁸.
- 2.45 The ability to demonstrate a 5YHLS is a fundamental component of a ‘sound’ Local Plan, as endorsed by the Framework¹⁹. Failure to do so engages the “*presumption in favour of sustainable development*”²⁰.

2025/2026 Data

- 2.46 Molior reports only 777 completions in Hounslow across 2025/26 representing a significant deficit against the figures projected (a shortfall of 973 homes) which need to be factored into the Council’s 5YHLS deficit position prior to adoption of the new Local Plan.

Phased Pipeline Permissions

- 2.47 Table 1 of Quod’s Matter 3 Hearing Statement identifies several schemes which no longer benefit from a deliverable planning permission, or whose forecasted housing delivery had already occurred and should therefore no longer contribute towards the Council’s 5YHLS.
- 2.48 We acknowledge and welcome that the majority of the identified schemes have since been removed from Phased Pipeline within EX44i.
- 2.49 Notwithstanding, the Council’s 5YHLS position continues to rely on a contribution of 1,087 homes in 2025/26 via its Phased Pipeline Scheme, which now represent historic housing completions and should therefore be excluded from the Council’s 5YHLS.

Site Allocations

- 2.50 The Framework expects all sites identified within the housing trajectory be “*deliverable*”²¹ and in accordance with the PPG tests²², informed by realistic assumptions over pre-commencement and delivery timescales.
- 2.51 We raise the following concerns with the forecast Site Allocations housing outputs that inform the Council’s 5YHLS (2025–2030). This is set out in further detail at Table 3.
- 2.51.1 Several Site Allocations are currently at Resolution to Grant (‘RtG’) stage and therefore do not benefit from an implementable planning permission. Given the current economic climate this may indicate stalled schemes, to which Hounslow West Station has benefitted from a RtG since 2022;

¹⁸ EX44h: Table 2 - Components of 5 Year Housing Land Supply:

¹⁹ Paragraph 69 of the Framework (December 2023)

²⁰ Paragraph 11(d) of the Framework (December 2023)

²¹ Annex 2 of the Framework (December 2023)

²² PPG ‘Housing Supply and Delivery’: Paragraph: 007 Reference ID: 68-007-20190722)

2.51.2 Where planning applications have not been submitted (Osterley; MOD Feltham), the evidence base²³ indicates that the planning process from validation to formal decision takes at least 1.5 years (18 months) on average;

2.51.3 The majority of schemes incorporate Higher Risk Buildings ('HRB'), requiring progression through the Building Safety Regulator Gateway 2 process, where approval times are 9 months + before a start of site can take place. RtG schemes determined before 2023 may need to be redesigned to accommodate current fire safety standards;

2.51.4 Construction programmes for 'large' and 'very large' schemes of this scale and complexity are likely to exceed 18 months from commencement to first home completion;

2.51.5 Anticipated build-out rates of 154–198 dwellings per annum are overly optimistic, even under favourable market conditions.

2.52 With respect to realistic delivery timescales, Table 7 of EX7 indicates that for 'large' schemes (100–499 units), the period from grant of planning permission to first completions is approximately 3.2 years (38 months).

2.53 For more complex development schemes comprising Higher Risk Buildings (HRBs) on brownfield land, the Council's assumed delivery timeline is not realistic. A minimum period of approximately 4.5 years (54 months) from planning permission to first completion is more credible, based on:

2.53.1 Detailed design and preparation to Gateway 2 submission: 12–15 months;

2.53.2 Gateway 2 approval process: circa 9 months;

2.53.3 Construction period to first completion: circa 30 months;

2.53.4 Gateway 3 process and certification: circa 3 months.

²³ EX7: Table 6

Table 3 - EX7 Extract of Table 7 (Start to Finish Lead in Times - Planning Consent to Delivery)

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

Site Size	Planning Consent to Delivery Period (years)
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

2.54 The assumed timeline of 3.2 years (38 months) from planning permission to first delivery is not supported by the recently adopted Support for Housebuilding LPG, which introduces an early-stage review mechanism where substantial implementation has not occurred within 30 months (2.5 years) of permission being granted. This indicates that 30 months is considered a reasonable period for post-permission activities to be completed and substantial works to have commenced. A construction period would then follow that before first completions are achieved.

2.55 Notwithstanding this, the Council assumes a significantly shorter ‘*Planning Consent to Delivery*’ period of approximately 1.5 years (18 months) for ‘very large’ schemes (500+ units). This is not credible, and materially understates the time required to bring forward developments of this scale and complexity, particularly when accounting for the Building Safety Regulator Gateway 2 and 3 processes alone, which can take in excess of 12 months.

2.56 Table 4 provides a commentary on Site Allocation which informs the Council’s Housing Trajectory (Figure 1 EX44h), and how they fail to meet the Framework’s definition of ‘*deliverable*’ and should therefore be reappraised.

Table 4 – Site Allocations included within the Housing Trajectory

ID	SCHEME NAME	CONTRIBUTION TO 5YHLS (HOMES)	TIME PERIOD	COMMENT
16	Brentside Park	308	2028-2030	No planning application submitted. No prospect of first homes before end of 2028.
28	27 Great West Road	500	2027-2030	Resolution to Grant secured in September 2025, but currently no implementable consent. GLA Stage 2 referral awaited. Gateway 2 to follow grant of PP with associated delay to commencement and first delivery.

				<p>Unrealistic delivery of first homes before end of 2027, therefore unrealistic that all 500 homes will be completed by 2030.</p> <p>This would require a build-out rate above the Council's assumed upper threshold.</p>
64	MOD Feltham	446	2027-2030	<p>No planning application submitted.</p> <p>No prospect of first homes before end of 2027, and therefore unlikely that any/all 446 homes would be completed by 2030.</p> <p>This would require a build-out rate above the Council's assumed upper threshold.</p>
74	Hounslow West Station	308	2028-2030	<p>Resolution to Grant secured in December 2022 but currently no implementable consent.</p> <p>GLA Stage 2 referral awaited.</p> <p>Since December 2022, worsening economic and viability position and introduction of BS9991, which may necessitate a new planning permission given RtG including HRB and the associated delays.</p> <p>Notwithstanding these fundamental challenges, delivery of first homes by 2028 is unrealistic, and would require works to have begun on site.</p>
84	Cavalry Barracks	396	2028-2030	<p>The current planning permission is unviable and was recently marketed for sale by CBRE. We understand that the site remains unsold.</p> <p>Since consent granted in May 2023, there is a worsening economic and viability position which may necessitate a new planning permission with associated delays.</p> <p>Notwithstanding these fundamental challenges, delivery of first homes before the end of 2028 is unrealistic, and would require works to have begun on site.</p>

				<p>Unrealistic delivery of homes before end of 2028 and given underlying context, therefore unlikely that any homes will be completed by 2030.</p> <p>It is unlikely that 396 homes will be completed by 2030 because this will require a delivery rate of 198dpa.</p>
98	Osterley Station Car Park	50	2026/27	<p>No planning application submitted.</p> <p>No prospect of first homes before end of 2026/27.</p>
118	GSK	297	2028-2030	<p>Resolution to Grant secured in March 2026 but currently no implementable consent.</p> <p>GLA Stage 2 referral awaited.</p> <p>Gateway 2 to follow grant of PP with associated delay to commencement and first delivery.</p> <p>Unrealistic delivery of homes before end of 2028, therefore unlikely that all 297 homes will be completed by 2030.</p> <p>This would require a build-out rate above the Council's assumed upper threshold.</p>
	Total	2,305		

2.57 Our review of the delivery assumptions for the major Site Allocations identified in Table 4 (and included within EX44i) is not intended to be exhaustive and the principles of our commentary may apply to other allocations included within the Council's housing trajectory.

2.58 Notwithstanding, our analysis clearly identifies material shortcomings in the Council's approach and raises significant doubt as to whether the 2,305 homes identified meet the Framework (Annex 2) definition of 'deliverable'. Accordingly, there is a clear question as to whether their anticipated output should contribute, either in part or fully, to the Council's five-year housing land supply.

2.59 As shown in Table 5, if these 2,305 homes are discounted from the Council's 5YHLS, the resulting housing supply position reduces to 9,974 homes alongside testing of a 5% and 20% buffer scenario.

Table 5 - Housing Supply with excluded Site Allocations

COMPONENT	HOUSING SUPPLY	HOUSING NEED	FIVE YEAR SUPPLY
Housing Supply over 5-year period: 1 April 2025 – 31 March 2030	12,279 homes	11,244	5.2
Housing Supply over 5 year period: 1 April 2025 – 31 March 2030 <i>(minus Table 4 housing schemes)</i>	9,974 homes ²⁴	11,244	4.43
Housing Supply over 5 year period: 1 April 2025 – 31 March 2030 <i>(minus Table 4 schemes + 5% buffer)</i>		11,806 ²⁵	4.22
Housing Supply over 5 year period: 1 April 2025 – 31 March 2030 <i>(minus Table 4 schemes + 20% buffer)</i>		13,492 ²⁶	3.70

Q10 – 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 requirements in the Plan?

- 2.60 St James’ Matter 2 Hearing Statement (WS2.8) states that Figure SS1 of the R22 Local Plan (S1) does not appear to align with the spatially defined locations endorsed by SPD1.
- 2.61 Following the Stage 1 Examination, the Council has proposed a Main Modification to Policy SC1 (EiP_C5_02) introducing Table SC1.1 to set out anticipated housing capacity across the Borough’s ten districts.
- 2.62 Notwithstanding its status as the Borough’s second-largest settlement and only Major Town Centre, Chiswick is identified for only “*modest growth*” equating to approximately 1.3% of total housing delivery over the Plan period. This approach fails to optimise development within one of the Borough’s most sustainable and well-connected locations.
- 2.63 Table SC1.1 identifies a minimum delivery of 1,192 homes in Chiswick between 2025–2041, with EX44i indicating that 940 of these homes will come from nine strategic site allocations.
- 2.64 Of these, Sainsbury’s Chiswick (Site Allocation 107) represents the largest single allocation, with a minimum capacity of 300 homes. Its capacity was reduced from 390 homes between the Regulation 19 and Regulation 22 publication stage with no justification provided by the Council.

²⁴ (12,279 – 2,305)

²⁵ 11,244 + 5% buffer (562)

²⁶ 11,244 + 20% buffer (2,249)

- 2.65 In contrast, a significantly greater proportion of the Borough’s housing requirement is directed towards other districts, including Brentford (11,268 homes), Central Hounslow (3,636 homes), Feltham (3,216 homes), and Hounslow West (1,553 homes).
- 2.66 Brentford and Feltham are comparatively less sustainable locations, lacking London Underground connectivity and instead relying on lower-frequency national rail services (typically 4–6 trains per hour). Both are designated as District Centres²⁷.
- 2.67 By comparison, Chiswick benefits from four London Underground stations, a national rail station, and is designated as a Major Town Centre.
- 2.68 In this context, it is difficult to justify the characterisation of Chiswick as an area of “*modest growth*”, given its higher level of accessibility, established services and facilities, and stronger residential values.
- 2.69 The draft Spatial Strategy therefore appears inconsistent, failing to direct a proportionate level of growth to one of the Borough’s most sustainable locations. Where sites are identified, the Plan also fails to optimise their capacity to meet and exceed the Borough’s development needs.

²⁷ Table A1.1 of the London Plan