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# **R22 Local Plan Matter 11: Implementation and Monitoring**

## **Hounslow Local Plan**

St James Group Ltd

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27<sup>TH</sup> APRIL 2026

# 1 Introduction & Summary

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- 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.
- 1.4 In response to Stage 1, the Council has updated its evidence base. Quod submitted a further hearing statement in response to Stage 1 matters on 20<sup>th</sup> April 2026.
- 1.5 The Inspectors have now issued MIQs in respect of Matter 9 (Site Allocations), Matter 10 (Delivery of Housing), and Matter 11 (Implementation and Monitoring), a response to which has been submitted by 27<sup>th</sup> April 2026.

## 2 Matter 11: Implementation and Monitoring

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**Issue: Whether the Plan would be able to be monitored effectively to ensure timely delivery of its proposals and be in general conformity with the London Plan?**

Q1: How would the implementation of the Plan policies be achieved? What mechanisms are there to assist development sites to come forward/progress?

- 2.1 St James' Matter 6 Hearing Statement (WS6.3) and Matter 9 raises concerns with the Council's Whole Plan Viability Assessment (EBV1). As a result, it does not demonstrate that the combined impact of policy requirements will maintain deliverability or enable sites to come forward.
- 2.2 Further documents requested by the Inspectors in Week 2 (EX41) required the Council to clarify the extent to which all policies are reflected in EBV1, and to explain how flexibility would be applied where development proposals face viability constraints.
- 2.3 In response, the Council's Viability Note (EX52) asserts that the Plan's approach to flexibility is in general conformity with London Plan Policies DF1 and H5.
- 2.4 However, EX52 effectively concludes that the Plan is deliverable only where schemes proceed via the Viability Tested Route. This is notwithstanding that EBV1 demonstrates that most typologies cannot viably support the 35% and 50% affordable housing thresholds before abnormal costs and other key inputs affecting viability are included.
- 2.5 The PPG<sup>1</sup> is clear that policy requirements should be set at a level that allows for planned sites and developments to be deliverable, without the need for further viability assessment at the decision-making stage. In other words, the Plan should not be set at the margins of viability or apply viability considerations only after policy requirements are fixed. This would risk embedding requirements in the Plan that are inherently unviable.
- 2.6 Industry has advised against this. Housing delivery data, including affordable housing delivery data, now demonstrates the reality of not adhering to a different approach. There is clear evidence that the overall cost burden on residential development has increased significantly in recent years, to an extent that it is preventing the delivering of new homes.
- 2.7 Absent of sufficient flexibility, the cumulative cost burden of the Plan will undermine its deliverability and its core objective: to secure an adequate and timely supply of market and affordable housing.
- 2.8 Setting unrealistic affordable housing thresholds also increases the risk of delay or refusal, as decision-makers often treat affordable threshold non-compliance as a negative weighing against an application, and in some cases a reason for refusal, even where justified on viability grounds.

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<sup>1</sup> PPG (Viability and Plan Making) (Paragraph 002 Reference ID: 10-002-20251216)

- 2.9 As set out in our Stage 1 Follow-Up Hearing Statement, both Government and the Mayor of London have introduced the Support for Housebuilding LPG in response to London’s housing and viability challenges. London Plan Policy H5 must now be read alongside this guidance, which supports reduced affordable housing thresholds of 20% and 35% (with a compliant tenure split of 60% social rent: 40% intermediate).
- 2.10 The Council’s approach, and response (EX52) is therefore not cognisant of changes at the regional level to support residential delivery in London.
- 2.11 As a minimum, the Local Plan should reference the revised threshold approach set out in the Support for Housebuilding LPG to ensure soundness and support housing delivery.
- 2.12 Notably, EX52 does not propose any amendments to Policy IMP2 or other draft policies to address viability concerns, nor does the Schedule of Modifications (EX57) include wording that explicitly links site allocation requirements with viability. If such provisions are intended, they should be clearly identified. There appears to be an overriding desire, not to positively prepare and incentivise delivery, and we are facing a similar plan previously adopted by the Council which probably will give rise to worsening delivery than before. This cannot be a sound approach.
- 2.13 The Plan should include explicit wording to ensure that policies, including site-specific requirements, can be applied flexibly where necessary to maintain viability and deliverability over the plan period.
- 2.14 We have suggested existing policy wording from the Tower Hamlets Local Plan (Policy D.SG5) to partially mitigate this concern.

*“For site allocations, the policies set out in this plan may be applied flexibly to ensure that the sites are viable and deliverable”.*

- 2.15 Additionally Quod attended the Newham Local Plan examination (on behalf of Berkeley Homes) which recently concluded in February 2026. Working closely with the Council and Inspector Fieldhouse, the Council agreed to modify the Plan in response to the representations submitted, to reflect the housing emergency and the importance of viability in decision making, as set out below. We would support a similar approach being adopted for the Hounslow Local Plan.

*BFN4 Part 3, Developer contributions and infrastructure delivery*

*BFN 4(3) Where substantiated financial viability constraints remain, applicants should deliver the maximum viable level of obligations, taking account of site specific considerations and the need to provide any new or improved infrastructure or other mitigation necessary to make the proposal acceptable in planning terms. It is expected that the Plan’s objectives will be prioritised as follows...*

*Part 2 Site Allocations, Paragraph 4.3*

*When determining an application, flexibility may be applied to the site allocation requirements based on an up-to-date assessment of need and the agreed viability position of the scheme.*

*This approach ensures that the site allocations remain deliverable within the context of sustainable development.*

- 2.16 The Plan should incorporate equivalent wording recognising the limitations of EBV1, namely that the 50% affordable housing target is not deliverable in nearly all cases, that key inputs such as abnormal costs have been excluded, and therefore to ensure overall deliverability, policies must be applied flexibly including in respect of site allocations.
- 2.17 The Plan should also make clear that the maximum reasonable amount of affordable housing secured through the Viability Tested Route carries equal weight to the Fast Track threshold approach.
- 2.18 The inclusion of such wording would align with London Plan 2021 Policy DF1, which requires boroughs to take account of circumstances where Applicants must deliver significant infrastructure to unlock development, beyond that typically expected for schemes of a comparable scale.
- 2.19 This approach is consistent with recent plan-making practice, including the adopted Lewisham Local Plan (2025) Policy DM2(D), which confirms that:

*“the council will seek planning obligations on a case-by-case basis having regard to the relevant policy requirements of the statutory Development Plan, development specific impacts, appropriate mitigation (including additional facilities or requirements made necessary by the development), viability and the statutory tests for the use of planning obligations”.*

**Q2: Is the inclusion of Policy IMP1 justified, given that there is a specific approach to sustainable development that is already provided in national policy?**

- 2.20 Policy IMP1 states that the Council will adopt a plan-led approach to growth and development, to be determined in accordance with the principles of sustainable development set out in the Framework, balancing social, environmental and economic objectives.
- 2.21 Part A of Policy IMP1 confirms that this approach will be implemented in line with the Framework’s principles of sustainable development.
- 2.22 However, the Framework is clear that plans should serve a distinct purpose and avoid unnecessary duplication of national policy<sup>2</sup>.
- 2.23 Policy IMP1 does not introduce any locally specific interpretation or additional requirements beyond those already established at the national level.
- 2.24 As drafted, the policy largely reiterates the Framework, without adding material value or local specificity. Its inclusion is therefore not justified and results in unnecessary duplication, which is contrary to the Framework.

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<sup>2</sup> Paragraph 16(f) of the Framework (February 2025)