

Examination of the London Borough of Hounslow Local Plan

Matters, Issues and Questions for Stage 1 hearing sessions identified by the Inspectors

Introduction

- 1) Prior to the Stage 1 hearing sessions, responses are invited from participants on the following Matters, Issues and Questions (MIQs) raised by the Inspectors. The MIQs do not intend to cover every policy criterion in the London Borough of Hounslow Local Plan 2020-2041 (the Plan). Instead, the MIQs are based on the Main Issues relevant to these hearing sessions as identified by the Inspectors and taking account of the views of the Council and other representations.
- 2) In producing the Stage 1 MIQs, consideration has been given to the definition of soundness in the National Planning Policy Framework, December 2023 (the Framework) taking account of the transitional arrangements in the current version. The Framework establishes that policies should be clearly written and unambiguous, so that it is evident how a decision maker should react to a development proposal. The Plan should, therefore, set out clear policies on what development will or will not be permitted. Issues relevant to the legal compliance of the Plan also form the basis of several questions.
- 3) The Council responded to some of the questions in this document in its letters dated 29 August 2025, 30 September 2025, and 17 October 2025 (documents EX2, EX6, EX8). The Council has also provided schedules of suggested modifications (documents EX3 and EX4) which accompanied that letter. Those documents also supplement schedules of suggested modifications (documents S11 and S11a) provided with the Plan submission documents. In producing hearings statements, there is no need for the Council to repeat the information in the aforementioned documents that are in the Examination library. However, the Council is encouraged to refer to and supplement this previously submitted information in its relevant responses.
- 4) In responding to this document, where reference is to be made to evidence and Examination documents produced by the Council these should be clearly cross-referenced by providing the document reference, page and paragraph numbers. The Council should also identify and address related concerns in representations and take account of any updates to national policy which are relevant to the Plan's soundness and legal compliance. This document may be supplemented with further questions from the Inspectors as the Examination progresses - including before and during discussions at the Stage 1 hearing sessions.
- 5) Further information about the Examination, hearings and the format for written statements is provided in the accompanying Guidance Note, and the Planning Inspectorate's Procedural Guide which should be read alongside the MIQs.

Matter 1: Legal Compliance and the Duty to Co-operate

Issue:

Whether the preparation of the Plan has complied with the relevant procedural, legal and other requirements?

Questions:

Plan Preparation

- 1) Has the Plan been prepared in accordance with the Council's Statement of Community Involvement and met the minimum consultation requirements in the Town and Country Planning (Local Planning) (England) Regulations?
- 2) Has the preparation of the Plan been carried out in accordance with the Local Development Scheme?
- 3) Is the Plan sufficiently clear in terms of the policies of the existing development plan that would be superseded by its adoption, and whether there are any policies of the existing Local Plan that would not be superseded?

Habitats Regulations Assessment

- 4) How was the Habitats Regulations Assessment (HRA) - document S6, carried out and was the methodology appropriate?
- 5) What potential impacts of the Plan were considered?
- 6) Would the HRA be reliant on proposed mitigation and avoidance measures, including any secured by other plans and projects, to ensure that they would avoid or reduce any potential for adverse effects on the integrity of any identified site within the national site network (formerly known as European or Natura 2000 sites), either alone or in combination with other plans and/or projects?
- 7) What were the conclusions of the HRA and how has it informed the Plan?
- 8) Has sufficient engagement with Natural England taken place with respect to the HRA and if so, are they satisfied with the content of the Plan and associated evidence in the HRA?
- 9) Have any concerns been raised regarding the HRA and if so, what is the Council's response to these?
- 10) Overall, have the requirements of the Habitats Regulations been met?

Sustainability Appraisal

- 11) Does the Sustainability Appraisal (SA) included in the Integrated Impact Assessment (IIA) - documents S3, S4 and S5, meet the requirements for a Strategic Environmental Assessment?
- 12) Is the methodology in the SA appropriate and robust and was it based on reasonable and up-to-date evidence?
- 13) What were the conclusions of the SA, to what extent did they inform the preparation of the Plan and how were reasonable alternatives considered?
- 14) Are the likely environmental, social and economic effects of the Plan adequately and accurately assessed in the SA?

Climate Change

- 15) Does the Plan accord with s19(1A) of the Planning and Compulsory Purchase Act (2004) (as amended) by including policies that are designed to secure that the development and use of the land in the area contribute to the mitigation of, and adaptation to, climate change?

Equality and Diversity

- 16) How does the Plan seek to ensure that due regard is had to the three aims expressed in Section 149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic?
- 17) Is there any substantive evidence to indicate that the requirements of Section 149 of the Equality Act 2010 have not been met?
- 18) Is there any evidence that the Plan would have significant effects on equalities that have not been identified in the IIA?

Duty to Co-operate (DtC), General Conformity with the London Plan 2021 and Other Legal Compliance

- 19) Has the Council engaged constructively, actively and on an ongoing basis with all relevant organisations on strategic matters of relevance, including in terms of housing, employment and infrastructure provision, as required by the DtC and to maximise the effectiveness of the preparation of the Plan?
- 20) Are there any inter-relationships with other authorities in terms of housing markets, economic activity, travel to work areas and the market for employment land and premises, which have not been specifically addressed?
- 21) Are there any outstanding concerns from adjoining authorities or other DtC bodies regarding the DtC? If so, how has the Council sought to address any issues raised? Have all Statements of Common Ground identified been submitted?

- 22) In overall terms, is the Plan in general conformity with the spatial development strategy for London (i.e. the London Plan)?

N.B. The Council should liaise with DtC bodies to produce Statements of Common Ground in advance of the hearing sessions, if they have not done so already.

Matter 2: Spatial Strategy and Strategic Policies

Issue:

Whether the spatial strategy and strategic policies of the Plan are positively prepared, justified, effective and consistent with national policy, and in general conformity with the London Plan, in relation to the scale and distribution of the development proposed?

Questions:

- 1) Does the Plan's vision and key objectives provide a positively prepared and justified approach for Hounslow's future growth?
- 2) Does the Plan as submitted appropriately identify "strategic policies" or are the Council's proposed modifications necessary for soundness?
- 3) Is the Plan consistent with the Framework which expects strategic policies to look ahead over a minimum 15-year period from adoption?
- 4) Is the spatial distribution of development across the Borough justified and what factors influenced the Spatial Strategy, for example, the approaches of the existing London Plan, physical and environmental constraints, effects on the highway network, the capacity of infrastructure to accommodate the proposed amount development?
- 5) What alternative options for the spatial strategy were considered?
- 6) Why was the approach of the submitted Plan chosen and is it an appropriate strategy having regard to reasonable alternatives?
- 7) Are the Plan's strategic policies sufficiently clear about the overall amount of new housing and employment development envisaged in each of Hounslow's ten districts as identified in the Plan?
- 8) Is the Plan sufficiently clear in terms of the approach to designated neighbourhood areas in Hounslow (Butts Farm, Hounslow Town Centre and Osterley) and is it positively prepared, justified and consistent with national policy if the strategic policies do not set out a housing requirement for those designated neighbourhood areas?
- 9) Did the methodology applied to site selection and the focus for growth in the spatial strategy take full account of flood risk and apply a sequential, risk-based approach to the location of development?
- 10) Is there sufficient evidence to support the Plan approach that there are no reasonably available sites in areas at lowest risk of flooding so as to justify the allocation of sites in areas known to be at higher risk either now or in the future from any form of flooding (i.e. those identified in Flood Zones 2 and 3)?
- 11) Has the cumulative impact of all allocated sites, and sites within other policies in the Plan, on the highway network and other infrastructure such as telecommunications, security, waste management, water supply and wastewater, and facilities for education

and health, been taken into account in the Plan? What evidence demonstrates this and what mitigation will be put in place to ensure that any adverse impacts are minimised?

- 12) Is there evidence that the electricity network in Hounslow/West London has the capacity to accommodate the residential and economic growth proposed in the Borough by 2041? To what extent should such matters be considered a potential constraint to delivery of the objectives of the Plan given the statutory duties on electricity distributors in the Electricity Act 1989 (as amended)?
- 13) Are the boundaries and scope of the Great West Corridor Opportunity Area (OA) and Heathrow OA as identified in the Plan consistent with the London Plan 2021?
- 14) Table 2.1 of the London Plan 2021 provides indicative figures for the Great West Corridor OA of 7,500 new homes (based on 2017 SHLAA capacity identified for 2019-2041) and 14,000 new jobs (up to 2041, based on the London Employment Site Database for 2016-2041). Policy SC1 of the Plan seemingly takes forward the new homes figure. However, given the omission of a specific jobs target in the Plan for the Great West Corridor OA, what is the justification for the approach to economic growth in that location?
- 15) Policies P1, P1(a), P1(b) and P1(c) provide specific approaches to guide development proposals in the Great West Corridor; is it positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan 2021. Responses should specifically address:
 - a) Whether the boundary of the Great West Corridor area and the subdivision into Great West Corridor West, Central and East; justified and in general conformity with the London Plan?
 - b) Whether the policies should be made clear that the support in principle for certain uses is subject to development proposals compliance with other relevant policies of the Plan and the London Plan?
 - c) Is the support in principle for retail and commercial uses, particularly in the River Brent Quarter, consistent with the sequential test applied to main town centre uses in national policy or otherwise justified?
 - d) Whether the approach to and location of the proposed new Green Innovation and Enterprise Hub is sufficiently clear in the Plan to be justified and effective?
 - e) If the suggested approach to phasing of development alongside improvements to the transport network is justified and sufficiently clear how this would be achieved?
 - f) Is the requirement that development proposals contribute to improvements to public transport provision and that social infrastructure be delivered alongside development, justified and if so, is it sufficiently clear how contributions from development proposals would be calculated?
 - g) Is the purpose of the Creative Enterprise Zone sufficiently reflected in the policy?
 - h) Are the other specific requirements of development proposals, sufficiently clear to be evident how a decision maker should react to development proposals?

- 16) Table 2.1 of the London Plan 2021 provides an indicative figure for the Heathrow OA of 13,000 homes (based on 2017 SHLAA capacity identified for 2019-2041). Policies SC1 and P2 of the Plan identify a contribution of at least 6,500 new homes in Hounslow up to 2041. What methodology was used to determine the apportionment of new homes to be provided in Hounslow given that the Heathrow OA extends beyond the Borough boundary?
- 17) Table 2.1 of the London Plan 2021 suggests that the indicative figure for the Heathrow OA is 11,000 jobs (up to 2041, based on the London Employment Site Database for 2016-2041). Policy P2 of the Plan goes on to address the need for economic growth in the West of the Borough in that context, including selective and limited releases of Green Belt to help meet the need for new industrial floorspace. What is the justification for that approach, given the omission of a specific jobs target to confirm the apportionment of the employment growth identified for the Heathrow OA in the London Plan 2021?
- 18) Would the overall approach to the Heathrow OA in the Plan and to Heathrow Airport specifically in Policy EC3, align with the potential spatial implications of the Airports National Policy Statement, landowner intentions and Policy T8 of the London Plan 2021? If not, why not?
- 19) Has the approach to the Heathrow OA been shaped by effective and on-going joint working between the Borough, the Greater London Authority, the London Borough of Hillingdon, Heathrow Airport Limited and other relevant bodies?
- 20) Is Policy P2, positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan 2021 insofar as it seeks to provide the overarching approach to guide development in the West of the Borough area as located in the Heathrow OA. Responses should specifically address:
 - a) Whether the boundary of the West of Borough area is justified and in general conformity with the London Plan?
 - b) Whether the other specific requirements of development proposals are sufficiently clear to be evident how a decision maker should react to development proposals?
- 21) Policy P2(a) relates specifically to the Cranford and Heston Neighbourhoods within the West of Borough Area. Are the specific requirements of development proposals in those locations justified, effective, consistent with national policy and in general conformity with the London Plan 2021?
- 22) Policy P2(b) relates specifically to the Feltham within the West of Borough Area. Are the specific requirements of development proposals in those locations justified, effective, consistent with national policy and in general conformity with the London Plan 2021?
- 23) Are the proposed spatial approaches relating to Bedfont, Brentford, Chiswick, Hanworth Hounslow, Hounslow West, Isleworth and Osterley and Spring Grove, positively prepared, justified, consistent with national policy and in general conformity with the London Plan? If so, for effectiveness, should they be policies in the Plan?

Matter 3: Meeting the Borough's Housing Needs

Issue 1:

Whether the Plan has been positively prepared and whether it is justified, effective, consistent with national policy and in general conformity with the London Plan in relation to meeting the Borough's housing needs?

Questions:

- 1) Is the overall quantity of new homes that are to be planned for in the Borough up to 2041 justified and consistent with national policy?
- 2) Having regard to the London Plan 2021 requirement for net housing completions of 1,782 homes per year for the ten-year period covering 2019/20 to 2028/29:
 - a) What is the basis for the Plan identifying the housing requirement for the remaining years to the end of the Plan period and would it be in general conformity with the London Plan 2021?
 - b) Is there any justification for departing from the London Plan 2021 housing requirements?
- 3) Is the housing requirement/target identified correctly in Policy SC1 and on the Housing Trajectory in SC2.1? Why does it include a base year of 2020/21? Should it be modified to take account of any under-delivery in the 2019/20 year of the London Plan 2021 requirement?
- 4) Detailed questions on housing supply are to be addressed separately during the Stage 2 hearings. However, in overall terms, is the Plan approach positively prepared insofar as it seeks to meet the identified housing requirement, particularly as the five-year supply must be made up of "specific, deliverable sites", with "specific, developable sites" also being a component of the supply over the rest of the Plan period?
- 5) Policy H2 of the London Plan 2021, amongst other things, sets out that boroughs should identify and allocate appropriate small sites (defined as below 0.25 hectares in size) for residential development. Would the proportion of housing anticipated to come forward on small sites in the Borough provide a genuinely plan-led approach to meeting the requirements of the London Plan 2021?
- 6) Is the Plan sufficiently clear as to the respective amount of housing that is to be delivered on small and medium sized sites (no larger than one hectare) in accordance with the Framework?

Issue 2:

Whether the Plan will be effective in delivering affordable housing to meet the needs of the Borough and an appropriate mix and standard of housing to meet the other housing needs of different groups in the community over the Plan period?

Questions:

- 1) What is the basis for the Council approach to meeting objectively assessed needs for affordable housing?
- 2) Policy SC2 of the Plan sets out the specific approach to affordable housing, in that regard:
 - a) Is the policy sufficiently clear and in general conformity with the strategic target and approaches in Policies H4 and H5 of the London Plan 2021?
 - b) Is there a justifiable reason why a minimum requirement for the number of affordable homes to be delivered in the Borough over the Plan period is not included?
 - c) In the absence of an identified minimum requirement for the number of affordable homes to be delivered, is the Plan positively prepared and how would the effectiveness of affordable housing delivery be monitored?
 - d) Is the proposed approach to affordable housing tenure splits justified, or should it include greater certainty and/or flexibility for individual site circumstances when having regard to the thresholds and tenure splits otherwise set out in Policies H5 and H6 of the London Plan 2021?
 - e) Is the approach to affordable housing supported by robust evidence to demonstrate financial viability, when having regard to other requirements in the Plan, and would the decision-making approach to viability be sufficiently clear?
 - f) Would any changes be needed to provide specific requirements or clear approaches relating to First Homes, Starter Homes or Build to Rent?
- 3) Is the approach in Policy SC3 in terms of housing mix; positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should address the following:
 - a) Whether the preferred housing mix in Table SC3.1 is based on up-to-date evidence, and whether there is sufficient flexibility in Policy SC3 to account for site specific circumstances and viability?
 - b) Whether the circumstances where alternatives to the housing mix in the latest Borough Local Housing Needs Assessment may be accepted, are sufficiently clear to be effective?
 - c) Is it justified for a development proposal to be expected to provide a unit of family accommodation at ground floor level or with direct access to the external amenity space where subdivision of large family houses is proposed?

- d) Is the definition of a large family house (i.e. more than 130 sq.m of 'original' floor area) justified?
 - e) The policy seeks 90% of all dwellings in the Borough meet Housing Technical Standard M4(2) of the Building Regulations 2015, and 10% of all dwellings meet Housing Technical Standard M4(3) for wheelchair user dwellings. Is that approach in general conformity with Policy D7 of the London Plan 2021?
- 4) Policy SC4 relates to the scale and density of new housing development, is it positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should address:
- a) If compliance with the design-led approach in London Plan Policy D3 should be a requirement of development proposals?
 - b) Is it justified and consistent with other policies of the Plan to defer to design standards in Building Regulations? For effectiveness and consistency with national policy should it focus solely on the design standards otherwise set out in other policies of the development plan?
 - c) Whether the expectations of development proposals should be clearer and cross refer to the detailed expectations of Policies CC1, CC2, CC3 and CC4 in terms of design, tall buildings and the historic environment insofar as they may be relevant to a new housing development?
- 5) Policy SC5 seeks to ensure suitable internal and external space. Is it positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should address:
- a) Taking account of the ongoing preparation of a new London Plan, for effectiveness would any changes be required to the expectations in terms of the minimum internal space standards otherwise specified in the Nationally Described Space Standard?
 - b) Are the benchmark external space standards set out in Figure SC5.1 justified? If so, for effectiveness, should the detailed expectations be included in the policy wording?
 - c) Would the implementation of the external space standards in Figure SC5.1 be compatible with the densities of development required to achieve efficient use of land on the proposed site allocations in the Plan?
- 6) Is the approach in Policy SC6 in terms of managing building conversions and sub-division of the existing housing; positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should address the following:
- a) Whether the policy is justified and sufficiently clear to be effective in terms of the locations where properties will be preferred to remain as family housing or conversion to flats of more modest intensity of accommodation, together with the circumstances where such differentiation would apply?

- b) What is the justification for the intended threshold of a property having a minimum 130 sq.m net original internal floor area to be considered suitable for conversion or subdivision, given that it seemingly exceeds the minimum floorspace for two units (including one family dwelling) under the Nationally Described Space Standard?
 - c) Is the intended approach of not supporting conversion of residential properties that have previously been extended (or had outbuildings added) to create a total accommodation of at least 130sq.m, justified?
 - d) For effectiveness, are changes required to Part G to make clear that compliance with the internal and external space standards set out in Policy SC5 and London Plan Policy D6, and Part H in terms of living conditions as set out in Policy CC2, are not discretionary?
- 7) Policy SC8 relates to specialist and supported housing for older people and vulnerable people. Is it positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should address:
- a) Having regard to the benchmark provision for housing for specialist older persons housing identified in Table 4.3 of the London Plan 2021 for 2017 - 2029, is the policy approach in general conformity and if not, is there justification for departing from the London Plan 2021?
 - b) Whether the intended contribution of 17 care and nursing home bedspaces per annum is justified relative to identified need over the Plan period and is it in general conformity with the London Plan?
 - c) If the policy should be clearer in terms of what locations would be suitable for care and nursing home bedspaces if not allocated in the Plan? Should it be more specific in terms of what would constitute 'good' public transport accessibility?
 - d) Whether the policy and the Plan as a whole, is in general conformity with London Plan Policy H12 and is positively prepared, effective and consistent with national policy in terms of addressing any identified needs for other forms of supported and specialist accommodation?
 - e) Whether the requirements for affordable housing identified under Part D of Policy SC8 are in general conformity with London Plan Policy H13, or otherwise justified?
- 8) Is the approach in Policy SC10 in terms of housing in multiple occupation (HMO), hostels, bed and breakfast, temporary and emergency accommodation; positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should address:
- a) If the policy should be clearer in terms of what locations would be suitable for HMOs, hostels and bed and breakfast accommodation, and purpose built or retrofitted temporary emergency accommodation if not allocated in the Plan, and is it justified if it differs from London Plan Policy H1?
 - b) For effectiveness, should the policy make clear what would constitute 'good' public transport accessibility, 'close proximity' to a designated town centre or a large

neighbourhood centre, and what 'convenient walking distance' of town centre facilities would be?

- c) Whether the requirement for HMOs to accord with Policy SC5 is justified?
 - d) Whether the threshold of a minimum 'original' floor area greater than 130sq.m to be suitable for conversion into a non-family HMO, hostel and bed and breakfast accommodation is justified? Why does it need to be 'original' floorspace?
 - e) Whether the expectation that purpose built or retrofitted temporary emergency accommodation proposals have regard to the Morrison + Company Family Emergency Accommodation Guidance document is justified and effective?
- 9) Policy SC11 relates to other forms of housing; is it positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan?
Responses should address:
- a) If the policy should be clearer in terms of what locations would be suitable in principle for purpose-built student accommodation and build to rent if not allocated in the Plan, and is it justified if it differs from locations identified in London Plan Policy H1?
 - b) Whether it is justified and consistent with national policy in requiring that proposals for purpose-built student accommodation would not generate additional demand for on-street parking?
 - c) If the policy should be clearer in terms of the detrimental impacts on the local area that are sought to be avoided by proposals for purpose-built student accommodation?
 - d) With regard to proposals for build to rent should closer links be drawn to London Plan Policy H11 to ensure general conformity with it?
 - e) Whether the approach indicating that large-scale purpose-built shared living accommodation is not suitable, except in exceptional circumstances, due to a extremely limited need - is justified? Are they exceptional circumstances or specific circumstances that are listed at Part F? Are those specific circumstances justified?
 - f) With regard to proposals for large-scale purpose-built shared living accommodation should closer links be drawn to London Plan Policy H16 to ensure general conformity with it?
 - g) Are there any additional requirements set out in the supporting text that are not reflected in the policy wording, are they justified in the context of the London Plan 2021 and should they be included within the policy for effectiveness?
- 10) Is the approach of Policy SC1 in offering support for proposals for self-build and custom housebuilding, sound and in general conformity with the London Plan 2021?
- 11) Policy GB6 relates specifically to residential moorings; is the approach justified, consistent with national policy, and in general conformity with the London Plan 2021, and are the requirements of development proposals sufficiently clear to be effective for decision making?

Issue 3:

Whether the Plan is positively prepared, justified, effective, consistent with national policy, and in general conformity with the London Plan, in its approach to meeting needs for Gypsy, Traveller and Travelling Showpeople accommodation?

Questions:

- 1) Is the approach in Policy SC9 and to the related allocations consistent with the Planning Policy for Traveller Sites (PPTS) insofar as it expects plans firstly, to identify a supply of specific deliverable sites to provide 5 years' worth of sites against locally set targets; and secondly, to identify a supply of specific, developable sites, or broad locations for growth for years 6 to 10 and, where possible, for years 11 to 15?
- 2) To what extent are the West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (WL-GTAA) and the Hounslow Site Allocations and Capacity Assessment (SACA) - Gypsy Traveller and Travelling Showpeople Accommodation Assessment Addendum (2024) considered to:
 - a) Provide a robust assessment of need and is the evidence, sufficiently up-to-date and reflective of current circumstances?
 - b) Provide sufficient justification for any changes in numbers of Gypsies and Travellers or Travelling Showpeople now resident in the Borough?
 - c) Provide justified assumptions for new household formation rates and is there any evidence of concealed households, overcrowding on existing sites, or pitches or plots that should be accommodated in the Borough?
- 3) The Plan seeks to allocate 20 new pitches for Gypsies and Travellers and 12 plots over the Plan period of 2020 to 2041. Is there evidence that some of the identified need in Figure 49 of the WL-GTAA (EBSC5) had already been met through delivery of additional pitches and plots between 2016 and 2025?
- 4) Can the Council explain its approach relative to the accommodation requirements and unmet needs outside of the Borough but within the West London GTAA area? Is such an approach – justified, effective and in accordance with the PPTS and the Public Sector Equalities Duty?
- 5) Is the approach of the Plan justified in not allocating transit sites and emergency stopping places, given the evidence of previous unauthorised encampments in Hounslow?
- 6) Does the Plan provide a positively prepared and effective approach to safeguarding of existing sites to support the needs of Gypsies, Travellers and Travelling Showpeople?
- 7) If the Plan does not allocate sufficient sites to meet identified needs during the Plan period, would Policy SC9 provide a positively prepared approach in setting criteria for sites to come forward as windfalls, and is such an approach justified and/or consistent with the PPTS (particularly paragraphs 25 - 28)?

Matter 4: Employment, Retail and Other Main Town Centre Uses (including proposed releases of Green Belt and Metropolitan Open Land)

Issue 1:

Whether the Plan has been positively prepared and whether it is justified, effective, consistent with national policy and in general conformity with the London Plan in relation to the Borough's economy and employment (including proposed releases of Green Belt)?

Questions:

- 1) What is the evidence in relation to jobs growth and the need for employment land/floorspace in the Borough over the Plan period? Is the employment land evidence base sufficiently up to date taking account of market signals?
- 2) Is the overall amount of employment land identified as to be provided in the Plan for industrial floorspace and office floorspace, justified? Why does the Plan not include a specific overall employment requirement in a strategic policy for industrial and/or office floorspace or a jobs target?
- 3) How does the overall amount of employment land identified to be provided in the Plan for industrial floorspace and office floorspace, relate to the jobs growth intended in the Heathrow OA and the Great West Corridor OA respectively in the London Plan 2021?
- 4) Is the Plan sufficiently clear as to the amounts and location of general industrial floorspace (and those otherwise falling within Classes B1(b), B1(c) and B8) that it intends to allocate or identify?
- 5) The approach of directing new offices to the Borough's four town centres, key office locations and sites allocated in the Plan is noted. Is such an approach justified and consistent with national policy?
- 6) Should Policy ED1 (or other policies of the Plan) make clear how office floorspace in Class E would be secured for the purposes intended?
- 7) Are the other requirements of development proposals for offices in Policy ED1, sufficiently clear to be evident how a decision maker should react?
- 8) How has the employment land evidence assessed the need for additional sites for logistics development? Is the evidence sufficiently up to date? Is the Plan positively prepared in regard to logistics and in particular, any requirements arising from the Heathrow OA in the London Plan 2021?
- 9) Have any alternative options for the distribution of new employment development been considered? If so, what were they?
- 10) Is the identification and boundaries of the Strategic Industrial Sites (SIL), Locally Significant Industrial Sites (LSIS), other existing industrial sites, Key Existing Office Locations (KEOL), Great West Corridor Creative Enterprise Zone and Strategic Outer London Development Centre - justified, consistent with national policy and in general conformity with the London Plan 2021?

- 11) Are the approaches in Policies ED1 and ED2 in terms of development proposals in SIL, LSIS, KEOL and other industrial and office sites – justified, effective, consistent with national policy and in general conformity with the London Plan 2021?
- 12) Is Policy ED1, effective, justified, consistent with national policy and in general conformity with the London Plan 2021 with respect to the requirements for affordable workspace and the list of development types and locations from which it will be sought? Responses should specifically address:
 - a) Whether there is sufficient evidence of the amount of affordable workspace that would be provided and whether it is viable in the locations identified?
 - b) Is the approach to payments in lieu for offsite affordable workspace and how it would be calculated justified and effective?
 - c) How eligibility and nominations for affordable workspace would be considered and secured?
 - d) How existing affordable workspace would be retained in the Borough and whether the approach to re-provision is justified and effective?
 - e) Whether the intention to defer some of the detail of the approach to a Supplementary Planning Document, including how contributions will be used, is justified and consistent with national policy?
- 13) Should the expectation that employment development coming forward on allocated sites comply with the minimum development quantum identified in the Plan also be linked to the design-led approach in London Plan Policy D3?
- 14) Is the approach of Policy ED2 with respect to co-location of industrial premises with residential development within part of the existing SIL within the Great West Corridor (West Cross Campus) and its proposed removal from the SIL - justified and in general conformity with London Plan Policies E5 and E7?
- 15) Does the Plan appropriately account for circumstances where co-location of existing employment land may be suitable elsewhere? If not, why not?
- 16) Are the requirements of Policy ED4 in terms of enhancing local skills, including the development proposals subject to the requirements, justified and effective?
- 17) When having regard to the previous questions on employment and opportunity areas, is the approach to Green Belt and Metropolitan Open Land (MOL) release in the Policy SD1 (and elsewhere in the Plan) in general conformity with the London Plan 2021 and can the Council explain how it considers that exceptional circumstances have been demonstrated to justify Green Belt (and MOL) releases to meet both identified needs employment, with regard to each of the following considerations:
 - a) Would as much use as possible be made of suitable brownfield sites and underutilised land that are not currently within the Green Belt (and MOL)?
 - b) Would the density of development of employment sites that are not currently within the Green Belt (and MOL) be optimised?

- c) Has plan-making activity been informed by discussions with neighbouring authorities in its Functional Economic Market Area and/or which fall within the Heathrow OA about whether they could accommodate some of the need for development, as demonstrated through Statements of Common Ground?
- 18) In the context of the above, is a 'comprehensive review' of Green Belt (and MOL) boundaries limited to only Hounslow Borough an appropriate and justified manner to identify any land required to address unmet needs for logistics, distribution and other activities associated with Heathrow Airport?
- 19) The Council's Green Belt Background Paper - incorporating Exceptional Circumstances Assessment June 2025 (EBGB1) indicates that the proposed releases of Green Belt (and MOL) in the Plan would only help to close the gap between the demand and supply of industrial land in both quantitative and qualitative terms. However, a considerable shortfall of both industrial and office floorspace over the Plan period would seemingly remain. In that context, to what extent does the evidence justify the proposed alterations to the Green Belt (and MOL) boundaries in the Plan (and those areas otherwise not proposed to be released) by:
- a) suitably identify the locations and appropriate scale of areas to be assessed?
 - b) evaluating the contribution each assessment area makes to Green Belt purposes?
 - c) considering whether applying the policies relating to areas or assets of particular importance in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development of the assessment area?
 - d) identifying if the release or development of the areas assessed would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the Plan area?
 - e) taking account of the intended permanence of Green Belt boundaries in the long term so they can endure beyond the Plan period?

N.B. We intend to go on to address the detailed approaches to site allocations and site selection in the Plan separately during Stage 2 hearings, including the proposed areas to be released from Green Belt / MOL and Policy P2(c).

- 20) The evidence in the Green Belt Background Paper - incorporating Exceptional Circumstances Assessment June 2025 (EBGB1) indicates that sites proposed to be released from the Green Belt would be expected to contribute towards compensatory improvements to remaining Green Belt land. Are the relevant policies of the Plan (Policies GB1, P2 and P2(c)) justified and effective in terms of the expectations of development proposals in those respects?
- 21) Without prejudice to our consideration of responses to Questions 17 to 19, is the proposed approach of designating land to be released from the Green Belt as LSIS justified and in general conformity with the London Plan 2021?
- 22) Is the expectation in Policy GB1 that development proposals maintain the openness, setting and visual amenity where it is near the Green Belt and MOL – justified and consistent with national policy?

Issue 2:

Whether the Plan has been positively prepared and whether it is justified, effective, consistent with national policy and in general conformity with the London Plan in ensuring the vitality of the Borough's town and neighbourhood centres?

Questions:

- 1) Has the Plan approach been informed by adequate and proportionate evidence in relation to Hounslow's town and neighbourhood centres? Responses should specifically address:
 - a) Whether the identification of the Borough's network of town and neighbourhood centres in Policy TC1 (and Table TC1.1) is justified?
 - b) Whether the evidence reflects the level of population being planned for in the Borough?
 - c) Whether the evidence is relevant, up-to-date and takes appropriate account of market signals, including having regard to the range of main town centre uses included in Class E of the Use Classes Order?
 - d) If not, what is the Plan seeking to achieve relative to the requirements for and distribution of main town centre uses?
- 2) Are there sufficient allocations/permissions to meet the identified needs set out in the Hounslow Retail Study Update 2024 (EBED2 and EBED2a)? If not, is the approach of the Plan justified and consistent with national policy insofar as it is required to look forward at least ten years ahead, or is there a net requirement still to be identified for each type of main town centre use?
- 3) Is the Plan sufficiently clear, including when taking Policies P1, P1(a), P1(b), P1(c), P2, P2(a), P2(b), P2(c) and Policies TC1, TC2, TC3, TC4 and TC5 together, as to the overall amount of each type of main town centre use and the locations being planned for during the Plan period? Would the approach of the relevant policies be effective for the purposes of decision making on future development proposals?
- 4) Would Policy TC1 be effective, justified, consistent with national policy and in general conformity with the London Plan in all other respects, including with regard to where sustainable growth will be supported?
- 5) Would Policy TC2 be effective, justified, consistent with national policy and in general conformity with the London Plan in all other respects, including the objective of retaining existing levels of retail floorspace in Feltham Town Centre (noting the range of main town centre uses that fall within Use Class E) and in terms of how an assessment would be made in terms of a development proposals contribution to the vitality and viability of the Borough's town centres?
- 6) Is the approach of Policy TC3 in seeking to manage the growth of retail and other main town centre uses; positively prepared, effective, justified and consistent with national

policy and in general conformity with the London Plan? Responses should address the following:

- a) Whether there is a suitable definition of large-scale retail development is appropriately defined in the Plan for the purpose of decision making?
 - b) Whether there is sufficient evidence to support the proposed locally set floorspace threshold of 500 sq.m of retail, above which an impact assessment would be required for development proposals?
 - c) If it is justified and consistent with national policy to have requirements linked to the Accessible London: Achieving an Inclusive Environment Supplementary Planning Guidance (SPG) document?
- 7) Is Policy TC4 positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan, insofar as seeking to manage town centre uses? Responses should address:
- a) Whether there any changes proposed to the boundaries of town centres and primary shopping areas on the Policies Map and if so, is there any specific evidence to justify the boundaries drawn?
 - b) If it would be effective and sufficiently clear for the purposes of decision making when seeking to retain a high proportion of retail uses in primary shopping areas?
 - c) Are the types of uses where an over-concentration is avoided sufficiently clear and justified? If so, should they be listed in the policy?
 - d) Are the development proposals for which a Health Impact Assessment would be required - sufficiently clear and justified?
 - e) If it is justified and consistent with national policy to have requirements linked to Supplementary Planning Documents (SPDs) rather than development plan policies?
 - f) Whether the terminology is justified and consistent with national policy when referring to 'business use' or should it alternatively refer to 'main town centre uses'?
- 8) Is the approach of Policy TC5 in seeking to manage neighbourhood centres and isolated local shops; positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021? Responses should address:
- a) Whether the 400m distance is justified in terms of a local shop being 'isolated', given Policy H1 of the London Plan implies that up to 800m could be a reasonable walking distance for the purpose of accessing sustainable means of travel?
 - b) Are the types of uses where an over-concentration is avoided sufficiently clear and justified? If so, should they be listed in the policy?
 - c) Are the development proposals for which a Health Impact Assessment would be required - sufficiently clear and justified?
- 9) Is the approach of Policy ED3 to proposals for hotels and visitor accommodation; positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan?

Matter 5: Transport, Communications and Connectivity

Issue:

Whether the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan in relation to transport, communications and connectivity?

Questions:

- 1) The evidence to support the Plan, included transport modelling and associated updates in the Hounslow Local Transport Impact Assessment Update and Addendum (documents EBEC2 and EBEC2a). Did the methodologies used sufficiently account for the cumulative effects of the potential growth in the London Plan 2021 for Hounslow and the surrounding London Boroughs, including any implications of potential Heathrow Airport expansion (should any associated development commence and/or take place before 2041), together with housing and employment growth in neighbouring districts outside of London?
- 2) Are the following planned transport improvements as identified in the Plan, including Policy EC1, to support housing and employment growth likely to be delivered in the plan period and if so, what is the source of the most up-to-date evidence in terms of funding arrangements and timescales for each?
 - a) West London Orbital - Brentford-Southall Rail Link to Elizabeth Line and HS2 Station
 - b) Piccadilly Line Service improvements
 - c) District Line Service improvements
 - d) Surface Level Access to Heathrow Airport via the South West Railway network
 - e) Gunnersbury Station improvements
 - f) Hounslow West Station improvements
 - g) Kew Bridge Station improvements
 - h) Golden Mile Station
 - i) Lionel Road Station
 - j) Improvements to bus services and introduction of express bus services
 - k) Cycling network improvements
 - l) Walking and cycling enhancements

N.B. The Council should liaise with stakeholders for each of the above infrastructure projects to produce a Statement of Common Ground in advance of the hearing sessions, if they have not done so already.

- 3) Would the delivery of the strategic requirements identified in the Plan, be contingent upon the above transport improvements being fully delivered within the plan period? If not, which projects are considered to be the critical infrastructure upon which the delivery of the Plan will be dependant?
- 4) Would the Plan provide an effective approach to respond to circumstances if the delivery of one or more of the planned transport improvements were to be delayed or otherwise not taken forward during the Plan period?
- 5) Does the Plan include any necessary safeguarding arrangements required to support the effective delivery of the planned transport improvements listed in Policy EC1?
- 6) Is the approach of Policy EC2 in seeking to support the development of a sustainable transport network; positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021? Responses should address:
 - a) Whether the requirements that development proposals are planned in accordance with the implementation of the Councils Parking and Kerbside Strategy, Controlled Parking Zones and restricting access to those zones to existing dwellings, are justified and whether the expectations are sufficiently clear to be effective?
 - b) Is the expectation of development proposals for vehicle crossovers and off-street parking spaces to be consistent with local policies that do not form part of the development plan justified or should the expectations be included in the Plan for effectiveness?
 - c) To be sufficiently clear for decision making, should the expectations in terms of the the Healthy Streets Approach cross refer to the definition in the London Plan?
 - d) Is the requirement that development proposals contribute towards on street visitor cycle parking, justified and if so, is it sufficiently clear how contributions from development proposals would be calculated?
 - e) Are the expectations in terms of highway safety are consistent with national policy?
 - f) Whether it is justified and sufficiently clear in terms of when development proposals will expect to be accompanied by Travel Plans, Healthy Streets Checks and Assessments and Active Travel Zone Assessments?
 - g) Whether the other specific requirements of development proposals are sufficiently clear to be evident how a decision maker should react to development proposals?
- 7) Is the approach of Policy EC4 which sets out the expectations of development proposals for telecommunications; positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021?

Matter 6: Viability and Policy Requirements

Issue:

Whether the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan in relation to viability and policy requirements?

Questions:

- 1) Is the Council's viability evidence proportionate and up-to-date having regard to relevant national policy and guidance, and has it taken full account of and influenced the policy requirements of the Plan?
- 2) Are the identified development requirements and principles in the policies of the Plan, including affordable housing, the housing mix, on-site and off-site provision of services and facilities and financial contributions toward infrastructure – justified, effective, consistent with national policy and in general conformity with the London Plan?
- 3) Are the policy requirements set at a level such that the cumulative cost of all relevant policies would not undermine deliverability of the Plan objectives?
- 4) Is there any clear evidence that the policy requirements of the Plan would affect the viability or deliverability of sites in strategic policies or the proposed allocation of sites as listed in Chapter 12 of the Plan or that any further changes are required to achieve soundness in those respects?
- 5) Is the approach of Policy IMP3 insofar as it seeks to support the implementation and monitoring of the Plan through the timely delivery of infrastructure; positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021? Responses should address:
 - a) Whether it is justified to seek to mitigate the impact of development through Section 106 agreements, where necessary and appropriate, but to defer the detail of how such planning obligations would be calculated to a supplementary planning document rather than including those details in the Plan?
 - b) Whether the expectations of development proposals to engage with relevant infrastructure and utility service providers is sufficiently clear to be justified and effective?
 - c) Are the expectations that development proposals mitigate the impact of development on the highway network consistent with national policy, or otherwise justified?

Matter 7: Green and Blue Infrastructure, Community Infrastructure and Environmental Quality

Issue:

Whether the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan in relation to green and blue infrastructure, community infrastructure and environmental quality?

Questions:

- 1) Policies GB2, GB3, GB8 and GB9 relate to open space; open space in educational use; allotments, agriculture and local food growing; and playspace, outdoor sports facilities and burial space respectively, are they positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021?
Responses should address:
 - a) Are the policies, opportunities for new provision and open space standards used to determine deficiencies of provision in publicly accessible open space - effective and based on robust and up-to-date evidence of need, and does the evidence take sufficient account of the expectations of Policy G4 of the London Plan?
 - b) Has a review been undertaken of the existing evidence to assess whether the conclusions relating to opportunities for provision and open space standards remain valid and, in such circumstances, would the Plan approach be justified?
 - c) Should the Plan include standards for public open spaces (including playing pitches and allotments), and clearly set out what open space is needed and is sought to be accommodated as part of development proposals where deficits are identified?
 - d) Whether the definition of Local Open Space in the Plan is intended to be distinct from the designation of land as Local Green Space set out in national policy, and if so, whether this should be made clearer?
 - e) Is the intention that development ancillary to a Local Open Space must preserve its predominantly open character; justified and consistent with national policy? Is such a policy expectation in Policy GB2 consistent with the provisions in Policy GB3?
 - f) Whether in seeking that development proposals enhance and enable provision of publicly accessible Local Space, to ensure consistency with national policy, should the Plan clearly set out the contributions expected from development?
 - g) For consistency with national policy, should the Plan also include how contributions from development proposals will be calculated and identify the criteria for projects to be considered directly related to development, and fairly and reasonably related in scale and kind to the proposal?
 - h) Whether the Plan approach to burial space, including Policy GB9 seeking preservation and availability of burial space, and Policies P2(c) and Site 57 insofar

as they support potential expansion of Hatton Cemetery; positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan 2021?

- 2) Policies GB4 and GB5 relate to the green infrastructure network and blue ribbon network respectively; are they positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021? Responses should address:
 - a) Whether the components of each of the networks have been adequately mapped in full within the Plan or other parts of the development plan, to be sufficiently clear for decision makers when the policies should be applied?
 - b) If it is justified and consistent with national policy to have requirements linked to SPDs (including setting local targets for development proposals), SPGs, and other documents such as the South East Inshore Marine Plan, Hounslow Biodiversity Action Plan, the Hounslow Nature Recovery Action Plan and Thames River Basin Management Plan - rather than development plan policies?
 - c) Is the Tree Replacement Matrix set out in Table GB4.1, justified by evidence?
 - d) Are the requirements for development proposals to maintain a minimum 8m buffer strip to any main river, a minimum 16m buffer strip to the Thames Tidal defence, or a minimum 5m buffer strip to any ordinary watercourse – sufficiently clear of where such a measurement should be taken and justified by evidence?
- 3) Policy GB7 relates to biodiversity - is it positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021? Responses should address:
 - a) Have the components of local wildlife-rich habitats and wider ecological networks, wildlife corridors and stepping stones that connect them, and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation – been identified and mapped in full in the Plan or elsewhere in the development plan, and safeguarded, as expected by national policy?
 - b) Would the Plan overall be effective in promoting the conservation, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity restoration and enhancement of priority habitats?
 - c) Is the approach to biodiversity net gain, effective, justified and consistent with national policy and the Environment Act 2021?
 - d) Is the requirement that major development proposals prepare ecological plans and strategies justified and consistent with national policy?
 - e) Are the expectations of development proposals to contribute to the actions set out in the Hounslow Biodiversity Action Plan, the Hounslow Nature Recovery Action Plan and London Local Nature Recovery Strategy sufficiently clear for decision makers?

- f) If financial contributions arise from the policy requirements, is it clear how they would be calculated, whether they have been viability tested and if they would otherwise be consistent with national policy?
- 4) Policies CI1, CI2, CI3, CI4 and CI5 relate to the provision and protection of community facilities; education and school places; health facilities and healthy places; culture and leisure facilities, and places of worship respectively – are they positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021? Responses should address:
- a) Would the policies, when taken together with other policies of the development plan, provide an appropriate and justified strategy to ensure sufficient provision is made for community infrastructure and facilities to support the intended levels of growth during the Plan period (including health, education and cultural infrastructure)?
 - b) Are the expectations of development proposals in terms of the contribution to community facilities in the Infrastructure Delivery Plan in Policy CI1 or as set out in Policy CI2, sufficiently clear and justified, including how they would be calculated and whether they have been subject to viability testing?
 - c) Are the requirements of development proposals that would result in a loss of community facilities, including the vacancy requirements, sufficiently clear and justified?
 - d) Whether the expectations in Policy CI2 relating to impact on traffic, car parking and noise, are justified and consistent with national policy?
 - e) Whether the requirements in Policy CI3 of major development proposals and those involving new hot food takeaways and betting shops are sufficiently clear to be effective and justified?
 - f) Whether the locational expectations of culture and leisure facilities and the requirements to undertake appropriate assessments for noise and other potential impacts in Policy CI4 are justified and sufficiently clear to be effective for the purposes of decision making?
 - g) Are the requirements of development proposals seeking new, expanded or improved place of worship, effective, justified and consistent with national policy – including that all seemingly need to be accompanied by a Transport Assessment?
- 5) Are the approaches of Policies EQ1 and EQ2 which relate to energy and carbon reduction, and sustainable design and construction respectively - positively prepared, justified, effective and consistent with national policy, and would they be in general conformity with the London Plan 2021? Responses should address:
- a) To what extent does the policy reflect the expectations of London Plan Policies SI2, SI3 and SI4?
 - b) Are the standards for sustainable design and construction as identified in Policy EQ2 and set out in Table EQ2.1, justified and consistent with national policy

(including the Written Ministerial Statement Planning: Local Energy Efficiency Standards - 13 December 2023)?

- c) Are the other requirements of development proposals in Policies EQ1 and EQ2 justified and sufficiently clear to be effective for the purposes of decision making?
- 6) Is Policy EQ3; positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan 2021 insofar as it relates specifically to flood risk and surface water management? Responses should address:
- a) Whether the approach is consistent with national policy which seeks to avoid inappropriate development in areas at risk of flooding by directing development away from areas at highest risk, and its associated approaches to flood defences, water management, drainage and Sustainable Drainage Systems (SuDs)?
 - b) Are the expectations of development proposals justified and consistent with national policy, in terms of requirements for additional evidence such as flood risk assessments, drainage strategies and compliance with greenfield runoff rates, and effective insofar as it is evident how a decision maker should react to planning applications?
 - c) Is it sufficiently clear as to how any developer contributions arising from the policy requirements would be calculated (for example for off-site flood defences), whether they have been viability tested and would they otherwise be consistent with national policy?
- 7) Is Policy EQ4 which sets out the approach to air quality; positively prepared, justified, effective and consistent with national policy, and would it be in general conformity with the London Plan 2021? Responses should address:
- a) To what extent does the policy reflect the expectations of London Plan Policy SI1, including the presence of Air Quality Focus Areas as identified in its Figure 9.1?
 - b) Are the expectations of development proposals justified and consistent with national policy, in terms of requirements for air quality assessments, management plans and design-stage mitigation measures?
- 8) Policies EQ5 and EQ6 relate to noise and lighting respectively; are they positively prepared, justified, effective and consistent with national policy, and would it be in general conformity with the London Plan 2021? Responses should address:
- a) Are the approaches to minimising noise disturbance and light pollution from development proposals, effective, consistent with national policy and in general conformity with the London Plan?
 - b) Is the policy sufficiently clear regarding the circumstances in which development proposals should be supported by a noise assessment and/or a light assessment report, and if so, are the approaches both reasonable and proportionate so as to be justified?

- 9) Is Policy EQ7 insofar as it relates to sustainable waste management; positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan 2021, if it does not specifically protect existing waste sites in Hounslow as otherwise identified in the West London Waste Plan?
- 10) Policies EQ8 and EQ9 relate to contamination and hazardous substances respectively; are they positively prepared, justified, effective and consistent with national policy, and would it be in general conformity with the London Plan 2021? Responses should address:
- a) Whether the expectations of development proposals are sufficiently clear in terms of where those relating to contaminated land and/or hazardous substances would apply, justified in terms of the associated development requirements and effective insofar as how a decision maker should react?
- 11) Is Policy EQ10 insofar as it relates to minerals; positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan 2021? Responses should address:
- a) To what extent does the policy reflect the expectations of London Plan Policy SI10?
 - b) Are the intended safeguarding arrangements for sites with identified minerals reserves and railheads used for distribution, justified and sufficiently clear to be effective?
 - c) Is the policy sufficiently clear regarding the circumstances in which development proposals should be supported by environmental impact assessment and environmental management systems, and if so, are the approaches both reasonable and proportionate so as to be justified or otherwise consistent with national policy?

Matter 8: Design, Tall Buildings and Heritage

Issue:

Whether the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan in relation to design, tall buildings and heritage?

Questions:

- 1) Policies CC1 and CC2 relate to context and character, and urban design and architecture respectively; are they positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan 2021? Responses should address:
 - a) Whether the intended approach in Policy CC1 that all new development 'conserves' and takes opportunities to 'enhance' is justified and consistent with national policy, or should the approach be more closely linked to London Plan Policies D1 to D6, and different for development proposals that may affect the historic environment?
 - b) Whether the individual and cumulative policy requirements of development proposals in Policies CC1 and CC2 reflect the design-led approach in London Plan Policy D3 and are they sufficiently clear to be justified and effective, insofar as being evident how a decision maker should react to development proposals?
 - c) Is the distinction between the status of other development plan policies and Supplementary Planning Documents as referred to in Policies CC1 and CC2, sufficiently clear and consistent with national policy?
- 2) Policy CC3 relates to tall buildings; is it positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021? Responses should address:
 - a) Is the overall policy approach consistent with the expectations of Policies H1 and D9 of the London Plan in terms of identification of locations for tall buildings and optimising housing delivery in PTAL3 to 6 locations or within 800m distance of a station or town centre boundary, and the Framework insofar as it seeks to achieve well-designed places?
 - b) Is the approach of identifying two definitions of tall buildings (higher scale areas - above 30m from ground level to the top of the building, excluding rooftop plant, and lower scale areas - above 21m from ground level to the top of the building, excluding rooftop plant) as given in Policy CC3, justified?
 - c) Is the identification of the locations in Figure CC3.1 that are considered suitable for higher scale tall buildings and lower scale tall buildings appropriate, informed and justified by robust evidence, and are the locations sufficiently precise?
 - d) Whether Policy CC3 Part K is sufficiently clear to be effective in guiding development proposals to the respective locations identified in Figure CC3.1?

- e) Are the maximum permissible heights set out in Table CC3.2 and referred to in Policy CC3 for sites, areas and existing tall building clusters, justified by evidence and in general conformity with London Plan Policies D3 and D9 - particularly in terms of the design-led approach and consideration of impacts arising from development proposals?
 - f) Are the requirements of Policy CC3 Part N in general conformity with London Plan Policy D9 insofar as consideration of impacts arising from development proposals? If not, are any differences justified by evidence and/or local circumstances?
 - g) Is the approach to buildings that do not meet the tall building definition, but which are still considered to be prominent in their surrounding context, justified and sufficiently clear to be effective, insofar as being evident how a decision maker should react to development proposals?
 - h) Whether the definitions of metropolitan scale, district scale and local scale tall buildings relating to context height ratio as set out in paragraph 6.15 are justified? If so, is the influence of those definitions on the suitability of a development proposal for a tall building sufficiently clear in Policy CC3 to be effective, insofar as being evident how a decision maker should react?
 - i) Is the approach of Policy CC3, when taken with Figure CC3.1 and Table CC3.2, justified and consistent with national policy when having regard to the presence of Public Safety Zones relating to Heathrow Airport? If so, for effectiveness, should the Plan be clearer in terms of the locations where such a designation applies?
 - j) Whether the approach of Policy CC3, when taken with Figure CC3.1 and Table CC3.2, has taken sufficient account of the presence of designated and non-designated heritage assets and their settings, and is consistent with the relevant statutory duties and associated national policy seeking to conserve and enhance the historic environment?
 - k) Should the Plan be clearer in terms of any zones of influence and key views intended to be preserved, particular in terms of the setting of the Royal Botanical Gardens Kew World Heritage Site and any buffers zones that are justified in the context of Policy CC4?
- 3) Is the approach in Policy CC4 relating to heritage; positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021? Responses should address:
- a) Whether the approach is consistent with national policy which seeks to conserve and enhance the historic environment; particularly the approaches to proposals affecting heritage assets, the significance of heritage assets, substantial or less than substantial harm, heritage at risk and sites of archaeological importance?
 - b) Is the Plan justified and effective in terms of the location of designated and non-designated assets in Hounslow, or where that up-to-date list is available for applicants and decision-makers?

- c) Is any duplication or departure from national policy with respect to the range of designated heritage assets or non-designated assets (including those of archaeological interest) covered in the policy; necessary and justified?
 - d) Notwithstanding the above, are the policy requirements – justified and sufficiently clear so that it would be evident how a decision maker should react to relevant development proposals and their influence upon the different types of designated and non-designated heritage assets and their settings (where appropriate)?
 - e) For effectiveness and to ensure consistency with national policy, should non-designated heritage assets be dealt with separately from designated heritage assets - particularly noting that the approach to effects on significance in national policy are different?
 - f) Where there the policy allows for consideration of subsequent updates of existing evidence, to be justified and effective, should it be clear that those updates should be relevant to the scope of the specific documents (i.e. Hounslow Characterisation and Growth Study, Tall Buildings Study, SPDs, etc)?
 - g) If the strategic and local views sought to be conserved or enhanced are justified by evidence, should they be clearly identified in the Plan?
 - h) Whether the specific approaches to registered parks and gardens, and listed buildings at risk, in Policy CC4 requirements of development proposals or actions to be taken by the Council?
 - i) Whether the approach to enabling development is justified, or should it otherwise be omitted to ensure consistency with national policy?
- 4) Is Policy CC5 consistent with the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 and national policy insofar as advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts? Are the associated requirements of development proposals in Policy CC5 for advertisement panels, hoardings and structures - effective?
- 5) Policy SC7 relates to residential extensions and alterations; is it positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should address:
- a) Whether for effectiveness there should be clearer cross-referencing to relevant heritage policies?
 - b) If changes are required to ensure consistency with national policy in terms of the status of development plan policies, supplementary planning documents and other relevant material considerations?
 - c) Whether the approach to relationships with neighbouring properties is consistent with national policy, and provides sufficient safeguards to prevent unacceptable harm relative to all potential effects of a residential extension or alteration?
 - d) If it is justified to seek to impose requirements on outbuildings, extensions and alterations carried out under householder permitted development right?

Proceeding to Stage 2 hearings later in 2026 will be contingent on the Inspectors' views at the end of Stage 1 that it would be the most effective manner to progress the Examination.

If proceeding to Stage 2 hearings, the additional MIQs and hearings programme would be published as soon as possible after the Stage 1 hearings.

J Ayres

INSPECTOR

G Wildgoose

INSPECTOR

21 November 2025