



**London Borough  
of Hounslow**

**Hounslow Local Plan 2020-2041**

**Statement of Common Ground**

**Between**

**London Borough of Hounslow**

**And**

**Historic England**

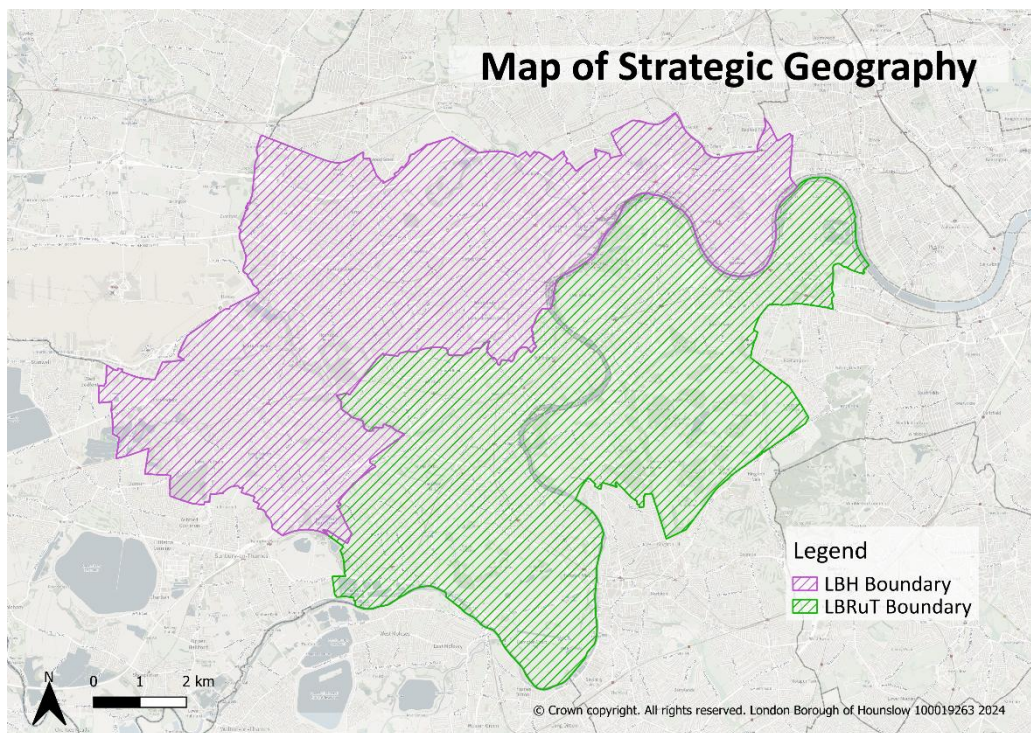
**Version no. 8**

**08/12/2025**

## 1. Introduction

- 1.1. This Statement of Common Ground (SoCG) has been prepared between the London Borough of Hounslow (LBH) and Historic England (HE). It seeks to inform the independent examination of the proposed submission version of the Hounslow Local Plan 2020-2041 and will be submitted to the Inspector ahead of the examination hearing sessions.
- 1.2. HE is a prescribed body under the Town and Country Planning (Local Planning) (England) Regulations 2012 and is the government's statutory adviser on the historic environment. LBH has undertaken extensive engagement with HE throughout the various stages of plan-production to this point.
- 1.3. The SoCG sets out the areas in which the parties have reached further agreement following the Regulation 19 consultation on the local plan, in order to address soundness issues and make other helpful corrections and clarifications. It also outlines outstanding matters for further consideration through the Examination process.

## 2. Strategic Geography



**Figure 1:** Map of strategic geography

- 2.1. The map above (figure 1) describes the strategic geography considered for cooperation on strategic matters as part of this Statement of Common Ground. The area contains the administrative areas of LB Hounslow (LBH) and LB Richmond upon Thames (LBRuT) given there are cross-boundary matters relating to the Royal Botanic Gardens, Kew World Heritage Site and buffer zone.

### 3. Strategic Matters and Record of Agreement

3.1. Through ongoing duty to cooperate engagement between LBH and HE, the following key matters of soundness have been identified:

- **Site allocations and Heritage Impact Assessments**
- **The soundness of Policy CC3 - Tall Buildings**
- **Other matters**

3.2. These key matters are set out in more detail below, with a description of the relevant background to the matter in question and a record of agreement provided (with any agreed modifications set out in the table at Appendix A below). In cases where there are matters which cannot be agreed at this time, these are set out as outstanding matters under each matter below (with further details provided in the table at Appendix B).

#### 3.3. Site allocations and Heritage Impact Assessments

##### ***Background***

3.3.1. HE's Regulation 19 representation set out the need for site allocations to be informed from the outset by the significance of the historic environment, which would be demonstrated through the production of Heritage Impact Assessments (HIAs). HE's representation states that the HIAs should consider cumulative effects in line with London Plan policy HC1.c, should comply with the relevant Historic England guidance and, should the development have the potential to affect the OUV of the Royal Botanical Gardens Kew World Heritage Site, the UNESCO guidance. They note that the HIAs should set out key sensitivities and any measures required to avoid and minimise harm to the historic environment, in addition to opportunities to enhance heritage significance or contribute to placemaking, which should then be translated into site allocation development principles.

3.3.2. Through further meetings and correspondence, HE suggested an approach of undertaking proportionate HIAs, where some allocations should have the development principles strengthened in the allocation wording and for other allocations where impacts on heritage significance are more likely, to undertake strategic HIAs of varying levels of detail. This approach was not taken forward, but LBH has prepared a Design and Heritage Background Paper to clarify the role of the existing evidence base and set out how LBH considers Historic England's concerns can be addressed.

##### ***Record of agreement***

3.3.3. In response to the Regulation 19 representation, LBH has agreed to present a number of modifications to the policy and supporting text to clarify the requirement for a process of Heritage Impact Assessment (HIA) to be undertaken and to clarify the need to be informed by the methodology contained in the UNESCO guidance for HIAs. Modifications have also been proposed to policy and to supporting text to align with the PPG terminology in respect to World Heritage Sites and their Outstanding Universal Value. These agreed modifications are outlined in Appendix A.

3.3.4. HE retains some concerns that the views modelling in the Great West Corridor Masterplan and Tall Building Study illustrates some harm to designated heritage assets,

which policies should seek to avoid and minimise. It is acknowledged that the relationship between the plan and evidence base is complex and modelling does not enable a full understanding of the implications of specific development sites for heritage significance, nor does it account for all recent consents or current proposals, some of which are harmful to the historic environment. This presents a challenge in understanding the potential impacts of specific sites, and cumulative impacts.

3.3.5. HE acknowledges that the evidence base for the Local Plan cannot comprehensively assess all potential heritage impacts and welcomes the clarity that the obligation to prepare proportionate HIA in appropriate circumstances will be placed on developers. However, to ensure that the balance between policy and evidence represents a positive strategy for heritage (in accordance with the NPPF), which is justified and consistent with national policy, modifications to some site allocation policies are needed to strengthen heritage protections, along with the modifications to general policies for tall buildings and heritage.

#### ***Outstanding Matters?***

3.3.6. There are a small number of areas where LBH and HE have not been able to find agreement with regards to Site allocations and Heritage Impact Assessments. Most notably, in lieu of HIAs HE has requested focused changes to individual site allocation policies to more consistently identify the key heritage assets that may be impacted. It has not been possible to agree all suggested changes, and it is therefore necessary to highlight these outstanding matters to the Inspectors for their consideration as part of the examination process. These outstanding matters are set out in the table at Appendix B.

### **3.4. The soundness of Policy CC3 - Tall Buildings**

#### ***Background***

3.4.1. HE's Regulation 19 representation expresses concern over the soundness of Policy CC3 and its evidence base. Concerns include the perceived ambiguity of the policy, questions around whether it is in general conformity with the London Plan and consistent with the NPPF, whether it is fully justified, and the clarity and robustness of the Tall Building Study.

3.4.2. The representation states that the GWC Masterplan permits tall building heights that are harmful to the historic environment, and that building heights on several sites, allowed at appeal, have exceeded the masterplan, allowing harmful development to come forward. In light of this context, HE called into question the integrity and effectiveness of the GWC Masterplan. They also recommend an update to the heritage impact assessment supporting the masterplan considering the publication of UNESCO's latest HIA guidance.

3.4.3. Further, HE's representation states that there is inconsistency between the GWC Masterplan and Tall Building Study in terms of methodological approach.

3.4.4. LBH considers that the updated CC3 Tall Building Policy is sound in its approach and is underpinned by an evidence base (the GWC Masterplan and Tall Buildings Study) that is in alignment with the London Plan and NPPF. LBH has produced a Design and

Heritage Background Paper providing further detail on the role of its evidence base in relation to the historic environment and how LBH considers Historic England's concerns can be addressed.

#### ***Record of agreement***

3.4.5. A number of modifications to policy CC3 have been agreed to enhance the clarity of the policy. Adjustments are proposed to strengthen and clarify the policy and supporting text in relation to heritage considerations, the need for HIA, and the application of policy to the Royal Botanic Gardens, Kew World Heritage Site. Other modifications are proposed by LBH to take forward presentational changes to mapping, including displaying all potential tall building sites on one map with only the cluster/site codes referred to. HE reserves its position on these modifications pending production of maps that would ensure Policy CC3 is justified and effective.

3.4.6. The above proposed modifications are outlined in appendix A.

#### ***Outstanding Matters?***

3.4.7. There are a small number of areas where LBH and HE have not been able to find agreement with regards to Policy CC3 - Tall Buildings. This includes a disagreement about whether building heights evidenced by the Tall Building Study and GWC Masterplan should be presented as 'maximum' and/or 'appropriate'. It is therefore necessary to highlight these outstanding matters to the Inspectors for their consideration as part of the examination process. These outstanding matters are set out in the table at Appendix B.

### **3.5. Other matters**

#### ***Background***

3.5.1. HE's Regulation 19 representation helpfully suggests a number of modifications to policies throughout the plan for clarity and accuracy.

#### ***Record of agreement***

3.5.2. LBH agrees to present a number of modifications in line with HE's recommendations to policies throughout the plan. These are set out in Appendix A.

#### ***Outstanding Matters?***


3.5.3. There are no outstanding issues relating to this matter.


**4. Governance Arrangements**

4.1. It is agreed that both parties will continue to liaise on strategic heritage matters relating to LB Hounslow at appropriate stages in the plan-making process.

**5. Signed confirmation**

5.1. The contents of this Statement of Common Ground are agreed for the purposes of the examination of the proposed submission version of the LB Hounslow Local Plan 2020-2041.

<b>Signed on behalf of LB Hounslow</b>		
<b>Name and position</b>	<b>Signature</b>	<b>Date</b>
Vincent Lacovara Director for Planning and Buildings		08/12/2025

<b>Signed on behalf of Historic England</b>		
<b>Name and position</b>	<b>Signature</b>	<b>Date</b>
Kim Miller MRTPI IHBC, Development Advice Team Leader		08/12/2025

## APPENDIX A: Table of Agreed Suggested Modifications

Where modifications are considered necessary to ensure the soundness of the plan, or otherwise where helpful corrections or clarifications are proposed, these are outlined in the table below.

Section / Policy / Paragraph	Page no.	Comment ref.	Reason for modification	Agreed Suggested modification text (tracked)	Additional comments
<p>General (throughout plan) - para. 2.41; PIA.d; bullet B.III p.38; bullet d, p. 41; bullet F p. 51; CC4.B; CC4.E; CC4.K; CC4.L; CC4.M; CC4.T; CC4.U; CC4.BB; para. 6.18; CC5.L; Policy CC3.A; CC4.B; para. 6.20 (4th sentence); CC5.B; CC5.J; the heritage section in the site allocation tables</p>		<p>Comment ref. HE1</p>	<p>Historic England's representation should state that the term significance or significance including contribution made by setting should replace other terms such as character, architectural appearance, architectural/ historical/ special interest, value, and sole references to setting (because setting is not separate to significance)</p> <p>Representation from Historic England seeking clarification on the terminology</p>	<p><b>Historic England's representation also makes this comment individually to parts of the plan. To avoid repetition, proposed changes that are made in line with this comment are made further down in the table in response to relevant individual comments. In summary these are the proposed modifications to:</b></p> <p><b>2.41</b>  <b>P1(a) D</b>  <b>Feltham P2(b) G.</b>  <b>Hounslow B VII)</b>  <b>P2 (a) D</b>  <b>P2 (b) G</b>  <b>CC1 G IV)</b>  <b>CC3 A</b>  <b>CC3 B</b>  <b>CC3 C</b>  <b>CC3 N) X</b>  <b>6.14</b>  <b>CC4. B</b>  <b>CC4.E</b>  <b>CC4.K</b>  <b>CC4.L</b>  <b>CC4 M</b>  <b>CC4.T I</b>  <b>CC4.T III</b>  <b>CC4.T IV</b>  <b>CC4.U</b>  <b>CC4.BB</b>  <b>6.20</b></p>	<p>Suggested adjustments from HE agreed with and suggested as mods.</p>

Section / Policy / Paragraph	Page no.	Comment ref.	Reason for modification	Agreed Suggested modification text (tracked)	Additional comments
				<p><b>EC4</b>  “Heritage Constraints” section of the following site Allocation refs: 1,2,3,4,5,6,7,8,9 10,11,13,14,16, 17,18,19,21,22, 23,25,26,27,28, 29,30,32,33,34, 35,36,37,51,52, 59,62,63,64,65, 67,69,70,72,74, 77,80,81,82,83, 84,90,96,98,99, 100,101,102, 103,105,106, 107,110,111, 113,114,115, 116,117,118, 122,123</p> <p><b>Proposed modifications in line with this comment more generally are outlined below:</b></p> <p><b>P1(a) D:</b>  P1(a) D <del>Preserving</del> <u>Conserving</u> and enhancing the <u>significance of</u> listed Art Deco buildings and structures in the area, including their setting and distinctive frontages, to bring them back into use, to give them due prominence and to improve the surrounding public realm;</p> <p><b>Brentford B III:</b>  III. Ensuring that new development <del>respects</del> <u>conserves the significance, including any contribution made by setting,</u> of the historic environment, the character of existing neighbourhoods, integrates archaeological remains, and is sensitive to the setting of assets outside the Borough boundary including the Royal Botanical Gardens, Kew World Heritage Site;</p> <p><b>Hounslow West F:</b>  F. Continuing to <del>protect</del> <u>conserve</u> the <u>significance of</u> <del>special architectural and historic buildings at</del> Cavalry Barracks;</p>	



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				<p><b>2.5:</b> 2.5 Growth will be balanced and directed to appropriate locations to ensure that the many great landscape, natural and built heritage assets and distinctive residential characters found across the borough will be <del>protected</del><u>conserved</u> and enhanced.</p> <p><b>2.30:</b> 2.30 The quality of life and health of residents will be improved by the provision of supporting infrastructure and high quality and responsive design that respect and enhance local character. The vision and growth strategy is to direct growth into areas that have capacity for change, while <del>protecting</del><u>conserving</u> and enhancing the many great landscape, natural and built heritage assets, and the distinctive established residential characters found across the borough.</p> <p><b>2.31:</b> 2.31 The rich and varied heritage of the borough includes many very important designated heritage assets. There are 28 conservation areas (mostly concentrated in the east of borough, in Chiswick, Brentford and Isleworth, and over 500 statutorily listed properties, both commercial and domestic. The borough also contains some of west London's remaining Great Estates at Chiswick, Gunnersbury, Boston Manor, Osterley and Syon, a unique and distinct aspect of the borough which contributes significantly to the</p>	

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				<p>environmental and cultural wealth of the borough. These assets have a considerable influence on the townscape of the borough, but so too do many non-designated assets, including locally listed buildings of townscape character and a wide variety of other assets important to local communities. Further designations will be made as appropriate and non-designated assets documented to the <a href="#">Heritage Greater London Historic Environment Record</a> so that their significance is properly understood and responded to in all development proposals impacting on them. Archaeological heritage will be <del>protected and respected</del> <a href="#">conserved</a> according to its significance.</p> <p><b>Osterley and Spring Grove E:</b> E. <del>Protecting</del> <a href="#">Conserving</a> views to Osterley Park and from within and across existing areas of Metropolitan Open Land;</p> <p><b>Chiswick E</b> E: <del>Protecting</del> <a href="#">Conserving</a> and enhancing the much-loved low to medium-rise Victorian and Edwardian townscape of two to three storey terraced housing and promoting this type as a cue for future developments;</p> <p><b>Isleworth B</b> B. Maintaining and improving the riverside village character through <del>preserving, protecting</del> <a href="#">conserving</a> and enhancing the varied townscape;</p>	

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				<p><b>CC1 E</b> E. Optimising redevelopment opportunities, whilst <del>respecting</del><u>conserving</u> and enhancing the area's distinctive character and historic environment including designated and non-designated heritage assets and their setting; and</p> <p><b>CC2 E</b> E. Working with developers, local communities and other partners to understand and improve the urban design and sustainability of their areas through, for example design codes, design guidance, Supplementary Planning Documents and neighbourhood plans and promote the use of our Design Review Panel to encourage high quality, creative and contemporary design solutions to deliver liveable and connected places with their own strong characters and identities, which <del>are sympathetic to</del><u>conserve</u> and take opportunities to enhance the area's existing heritage and character;</p> <p><b>CC5 B</b> CC5 B Ensuring that advertisements do not adversely impact on the <del>setting</del><u>significance</u> of heritage assets, <u>including any contribution made by setting</u>, the skyline or the amenity of residential properties. Any impact will be assessed in terms of its significance;</p> <p><b>CC5 J</b> J. Demonstrate that the advert is sensitively placed and designed to not adversely impact <del>sensitive heritage locations</del>, the</p>	

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				<p><del>significance</del> <del>setting</del> of heritage assets, <u>including any contribution made by setting</u>, and strategic or local views;</p> <p><b>CC5 L:</b> L. Demonstrate that the advertisement, its illumination, and associated structure makes a positive contribution to amenity and will not adversely impact (or cumulatively impact) on the amenity of residential areas or pedestrians and vehicle movement and safety by being sensitively designed in terms of their size, location and degree of illumination, their impact on the local context, street-scene, the building on which some are displayed, <u>the significance of</u> designated and non-designated heritage assets including <u>contribution made by</u> their settings and wider townscape;</p>	
2.40	28-29	HE2	Representation from Historic England seeking clarification on what the Golden Mile is.	2.40 The area has a rich heritage, ranging from former industrial building to great estates. <u>The Great West Corridor, also known as t</u> <del>he</del> 'Golden Mile' <u>stretches from Gillette Corner to Chiswick and itself</u> is peppered with significant listed art deco buildings including the landmark former Gillette factory and the JC Decaux offices.	
P1 Great West Corridor	28	HE3	Historic England seeking explicit mention in Policy P1 of the need to conserve and enhance heritage assets	<p>Insert new part into Policy P1:</p> <p><u>FF. Ensure that development conserves and enhances the significance of heritage assets, including any contribution made by their settings, in and around the Great West Corridor. Particular attention should be paid to the need to avoid harm to the Outstanding Universal Value of the Royal Botanic Gardens, Kew World Heritage Site.</u></p>	

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P1 (2.41)	29	HE3	Historic England seeking clarification that heritage is mentioned to align with policy and that the term significance or significance including contribution made by setting should replace other terms such as character, architectural appearance, architectural/ historical/ special interest, value, and sole references to setting (because setting is not separate to significance)	2.41 Potential developments will need to <del>account</del> <u>conserve and enhance</u> <del>for these</del> <u>significance of</u> important heritage assets <del>and their including any</del> <u>contribution made by</u> setting in any proposals <u>in and around the Great West Corridor Area.</u> <del>;</del> <del>giving great weight to the assets' conservation.</del>	
P1(a) A	32	HE4	Representation from Historic England seeking clarification on the terminology in this policy.	P1(a) A. Supporting the <del>transformation</del> <u>conservation and enhancement</u> of Boston Manor Park, including conserving the grade II listed structures of the park, appropriately improving the landscaping to the grade I listed Boston Manor House, increasing biodiversity, and providing facilities for the local community;	
Hounslow B VII)	45	HE6	Historic England's representation seeks a correction that the terms conserve and enhance should replace the terms protect, preserve, respect, safeguard in line with the NPPF and London Plan	B VII) embrace the delivery of contemporary and exemplary new buildings and landmarks in the town centre, whilst <del>protecting</del> <u>conserving</u> and enhancing <del>existing historic elements.</del> <u>the historic character and the significance of the heritage assets from which that</u> <del>from which that</del> <u>is derived.</u>	

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			It also seeks further clarification from the policy text.		
Cranford and Heston P2(a)	55	HE7	Representation from Historic England seeking further clarity from the policy that options for its optimal viable use are explored	D: Strengthening local identity and character of Cranford Neighbourhood Centre by investigating <del>the feasibility of relocating</del> <u>options for the optimal viable use of</u> the historic “lock up” Grade II Listed building <del>to the important landmark location at the junction of Bath Road and the Avenue.</del> The lockup should be reactivated with communal, social and/or retail uses;	
Bedfont B	57	HE8	Historic England’s representation seeks a correction that the terms conserve and enhance should replace the terms protect, preserve, respect, safeguard in line with the NPPF and London Plan and correction that the significance of heritage assets can be derived from their setting	Protecting <del>the</del> surviving historic fabric and <u>conserving the significance of heritage assets including any contribution made by their settings</u> in locations such as Bedfont Green;	
Feltham P2(b)	63	HE9	Historic England’s representation seeking clarification that it is the significance (including the contribution of setting) of the grade II church tower that needs conserving and enhancing, in particular, its landmark status,	G: <del>Preserving-Conserving</del> and <u>enhancing the significance of</u> Feltham Town Centre Conservation Area and <del>protecting-conserving and enhancing and contributing to local views of the spire of</del> <u>the significance of the Grade II listed St Catherine’s Church tower, in particular its landmark status which requires development proposals to be subservient in height and massing and maintain or enhance key views in</u>	

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				<u>which the tower's significance can be understood;</u>	
CC1	140	HE12	Response from HE that the monitoring commitment is extended to the historic environment evidence base	CC1 F. Monitoring and updating the <u>historic environment evidence base</u> , Hounslow Characterisation and Growth Study and Character, Sustainability and Design Codes SPD	
CC1 IV	141	HE13	Response from HE that the understanding of Hounslow's historic environment relates to a broader evidence base.	CC1 IV) Makes best use of redevelopment opportunities whilst <del>respecting-conserving</del> and enhancing the <u>significance of the area's historic environment and respecting the area's</u> distinctive character <del>and historic environment as</del> -set out in the Hounslow Characterisation and Growth Study and Character, Sustainability and Design Codes SPD, or any subsequent update.	
CC1 G II.	141	HE14	Response by Historic England state that this policy should explain the way views contribute to character and context.	II. Understand and respond to the wider context and history of the area, the needs, culture and aesthetic experience of local and future communities, the townscape setting of the site, <u>strategic and local views</u> , its natural landscape, its sense of place, and its urban structure, built form and function.	
CC3	149	HE16	Historic England's representation stated that the term significance should replace other terms, such as character and appearance, architectural/historic/special interest, value and sole references to setting.	A. Supporting a limited number of tall buildings in Feltham town centre. Tall buildings in this location should be carefully designed to <del>avoid impacting- conserve and enhance</del> the <u>setting</u> significance, <u>including any contribution made by setting</u> , of <u>heritage assets including Feltham Green and Town Centre Conservation Area and</u> St. Catherine's Church tower, and	

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			<p>Historic England's representation highlighted that St Catherine's church tower is not the only heritage consideration and suggested adjustments to the policy.</p>	<p>should improve the arrival experience into and the legibility and permeability of the town centre;</p>	
CC3	149	HE17	<p>Representations from RBGK, HE and LB Richmond which requested that harm should be referred to instead of significant adverse impact to align with the NPPF. Requests to clarify wording to make meaning clearer</p> <p>Historic England's representation stated that the term significance should replace other terms, such as character and appearance, architectural/historic/special interest, value and sole references to setting.</p> <p>LB Richmond's representation seeks clarity on the terms shoulder height which are set out in the GWC masterplan and how this relates to the policy.</p>	<p>B. Supporting a limited number of tall buildings in Brentford town centre. These should be <del>designed carefully and placed sensitively located and designed so as to avoid so as not to have a significant adverse impact on</del> <u>harm to the significance, including any contribution made by setting, of, views from and between</u> heritage assets including Royal Botanic Gardens Kew World Heritage Site, Syon Park and the Thames <del>foreshore</del> landscape. They should also <del>respect</del> <u>conserve</u> and respond to the area's special townscape <del>and heritage value</del> and <del>protect</del> <u>conserve</u> views across the Thames, <del>including those from Richmond</del>;</p> <p>C. Supporting tall buildings along sections of the A4 Golden Mile frontage. These should be <del>carefully placed</del> <u>sensitively located and designed</u> so as not to create a wall of tall buildings, ensuring they relate sensitively to surrounding residential areas and <del>do not have a</del> <u>avoid harm to the significance, including any contribution made by setting, adverse impact on the setting of, or views from of</u> heritage assets including Gunnersbury Park, Royal Botanic Gardens Kew World Heritage Site, Syon Park and Osterley Park. <u>In the remainder of the Corridor, building heights should be informed by</u></p>	



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				<a href="#">the 'shoulder heights' outlined in the GWC Masterplan, whilst also responding to townscape and heritage considerations.</a>	
CC3	149	HE18 & HE19	Amendment to provide clarity in response to reps from HE, RBGK and LB Richmond.	F. Preserving the predominantly 2 to 3 storey (less than 10m) building heights across the rest of the borough with some limited scope for 4 to 6 storey ( <del>up to</del> <a href="#">below 20.1m including plant and lift overrun</a> ) buildings/ elements <del>in identified locations</del> <a href="#">where it is considered they would complement local context</a> , to assist with way-finding <a href="#">and where informed by a proportionate HIA from the applicant</a>	
CC3	149-150	HE21	Historic England's representation stating that to conform with D9 the reference to built should be removed to ensure all context is considered.	D. Supporting tall buildings in Hounslow Town Centre that deliver a coherent skyline, aid in legibility and wayfinding and respects and responds to the existing <del>built</del> context;  J. Tall buildings are defined based on their location, taking into consideration the local <del>built</del> context. There are two definitions of tall buildings in the Borough	
CC3	150	HE22	To clarify which locations are potentially appropriate for tall buildings and correct a mistake in the Reg 19 version which referenced the incorrect figure.  Correction of cluster name in table.	K. Be located in the areas identified as having potential for tall buildings, as shown in Fig <del>CC3.4</del> <a href="#">CC3.3</a> ;  New figure to replace all the maps as per HE27 & HE28, with a title as follows:  <a href="#">Figure CC3.3: Map showing areas identified as having potential for tall buildings and associated cluster/site codes</a>  Correction to name of Cluster CL1	HE reserves its position on this modification pending production of a map that appropriately translates the tall/focal buildings associated with mid-rise clusters in the GWC Masterplan, and the 'Appropriate Areas' identified in the Tall Building

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				<p><del>Wyke Green Cluster</del> <u>Tesco Osterley Cluster</u> (CL1)</p> <p>Zoomed in maps to be provided in appendix with the following titles</p> <p>Figure CC 3.3 (a): Map showing <u>areas identified as having potential for tall buildings and associated</u> cluster/site codes within the Great West Corridor:</p> <p>Figure CC 3.4-3 (b): Map showing <u>areas identified as having potential for tall buildings and associated</u> cluster/site codes for Feltham:</p> <p>Figure CC 3.5-3 (c): Map showing <u>areas identified as having potential for tall buildings and associated</u> cluster/site codes for Bath Road:</p> <p>Figure CC 3.6-3 (d): Map showing <u>areas identified as having potential for tall buildings and associated</u> cluster/site codes for Hounslow Town Centre &amp; London Road, Isleworth:</p> <p>Figure CC 3.7 3 (e): Map showing <u>areas identified as having potential for tall buildings and associated</u> cluster/site codes for West Middlesex University Hospital and Brentford Town Centre:</p> <p>Figure CC 3.8-3 (f): Map showing <u>areas identified as having potential for tall buildings and associated</u> cluster/site codes for Chiswick Town Centre Area:</p>	<p>Study, to show 'potential areas for tall buildings' as expressed in policy CC3.</p>

Section / Policy / Paragraph	Page no.	Comment ref.	Reason for modification	Agreed Suggested modification text (tracked)	Additional comments
CC3	151	HE25	<p>Amendments in response to reps from HE, RBGK and LB Richmond that policy is amended to separate out the assessment requirements for each topic (townscape, visual and heritage assessment) for clarification.</p> <p>Historic England's representation stated that the term significance should replace other terms, such as character and appearance, architectural/historic/special interest, value and sole references to setting.</p>	<p>CC3 N) X. Clearly demonstrate through appropriate townscape analysis <del>and</del> verified views <u>and, where applicable heritage impact assessment, how proposals:</u></p> <ul style="list-style-type: none"> <li>- <u>Conserve and</u> enhance the townscape,</li> <li>- <u>Conserve and enhance the significance setting</u> of surrounding heritage assets, <u>including any contribution made by their settings</u></li> <li>- <u>Respect and</u> local landmarks and positively contribute to the overall skyline and views and protect short, mid and long range views in addition to significant linear and panoramic views and the setting of the Thames;</li> </ul> <p>-</p>	
CC3	151 & 159	HE26	<p>Changes made to CC3.O policy text and paragraph 6.15 of the supporting text in response to reps from LB Richmond and Historic England seeing clarity on managing tall buildings outside the definition.</p>	<p>O. Buildings that do not meet the tall building definition, but which are still considered prominent in their surrounding context, for example two to three times the contextual reference height (<del>local scale tall building</del>), must respond appropriately to local contextual building heights and be compatible to their surroundings and the character of the area.</p> <p><del>6.15</del> Where buildings are proposed that do not meet the definition of higher or lower scale tall buildings, but are still taller than their surroundings, proposals should be informed by an understanding of the surrounding <del>built</del> context <u>and a full HIA</u>, referring to other relevant policies in the Local Plan, the Character, Sustainability and Design Codes SPD and the Tall Buildings</p>	

Section / Policy / Paragraph	Page no.	Comment ref.	Reason for modification	Agreed Suggested modification text (tracked)	Additional comments
				<p>Study for an understanding of context heights.  <del>Tall buildings can be classified into different height categories based on the context height ratio. The following tall buildings classification is established in relation to the context height:</del></p> <ul style="list-style-type: none"> <li><del>• Local Scale Tall Building — 2 to 3x context height;</del></li> <li><del>• District Scale Tall Building — 3 to 5x context height; and</del></li> <li><del>• Metropolitan Scale Tall Building — 5x and above context height.</del></li> </ul>	
CC3	<b>155-157</b>	HE27, HE28	<p>Response from Historic England seeking clarity on the tall building locations.</p> <p>Historic England representation seeking clearer presentation of table</p>	<p>Amend Map at Figure CC3.3 as follows:</p> <p>Map of the full borough with all tall building sites indicated with site boundaries, tall building cluster outlines, focal buildings and local landmarks. Online version to be interactive. Map will also only include the cluster/site codes (removing the height ranges &amp; AOD labels).</p> <p>Appendix to be included with zoomed in versions of the maps (i.e. removing CC3.4-CC3.8 and moving updated versions, as above, to an appendix).</p> <p>Reformatting of table to highlight header rows.</p>	Subject to resolution of issues raised at HE22 about the relationship between Policy CC3, maps and evidence base.
CC3	<b>152</b>	HE29	Historic England's rep expresses some confusion, saying that Brentford appears in the lower scale definition in the text, however in the higher scale on the map. This is because	<p>Amendment to the Map at Figure CC3.1:</p> <p>Move the Brentford Label to sit on top of Brentford Town centre instead of over the GWC</p>	

Section / Policy / Paragraph	Page no.	Comment ref.	Reason for modification	Agreed Suggested modification text (tracked)	Additional comments
			the Brentford label is placed on the GWC.		
CC3	158-159	HE30	<p>Historic England's representation seeking clarity on wording on the scope of the Tall Building's Study's assessment of historic assets.</p> <p>Other changes relate to Historic England's representation stated that the term significance should replace other terms, such as character and appearance, architectural/historic/special interest, value and sole references to setting.</p>	<p>6.14 The sites identified as appropriate for tall buildings have been informed by a detailed local urban design assessment, which took into account a variety of considerations including public transport accessibility levels, green and blue infrastructure, planned growth and <u>locations of</u> heritage assets amongst other factors to understand areas where there is potential for tall buildings. The remit of this study did not include assessment of all the potential impacts of a tall buildings, such as sunlight and daylight impacts <u>or a full assessment of harm to heritage assets through a detailed site specific assessment</u>, therefore tall buildings are not automatically acceptable on the identified sites in Table CC 3.2 and will be required to justify their approach towards height and built form and evaluate the benefits and justification for a tall building in relation to surrounding context. <u>This should include an assessment of impacts on the significance of heritage assets, including any contribution made by their settings</u>, views and townscape.</p>	
CC4	161	HE35	<p>Historic England's response asking that reference to enabling development where appropriate is removed as it should only be as a last resort- policy changes clarify this approach.</p>	<p>F. Bring heritage assets back into meaningful use <u>consistent with their conservation</u>, where they have been left empty, abandoned or underused. <del>including</del> <u>This may include</u> using enabling development <del>where appropriate as a last resort and consistent with their conservation;</del></p>	

Section / Policy / Paragraph	Page no.	Comment ref.	Reason for modification	Agreed Suggested modification text (tracked)	Additional comments
CC1	141	HE36	<p>Response from Richmond and Kew that the phrasing “should not have a significant impact on” does not reflect the NPPF wording and that it should state ‘adverse impacts’.</p> <p>Move to policy CC1 is in response to comments from RBGK and Historic England that views are not of themselves heritage assets and the management of them is more to do with their context, and therefore would better sit in CC1 to enhance clarity of the policy.</p>	<p>Insert clause CC of CC4 after CC1 G) III) (and remove from CC4) and amend wording as follows for consistency with the rest of CC1</p> <p>CC1 G) IV. Conserve and enhance any strategic or local views identified in the Hounslow Characterisation and Growth Study and Character, Sustainability and Design Code SPD and undertake a visual impact assessment to demonstrate no <del>adverse</del> <u>harmful</u> impacts on the designated view or on views from Royal Botanic Gardens Kew World Heritage Site <u>or the buffer zone</u>. Avoid any further harm to the setting and views of the Thames, ensuring any identified significant linear and panoramic views of the Thames are tested to understand the impact of development.</p> <p>Amend clause lettering to match formatting.</p>	
CC1	140	HE36	<p>Move to policy CC1 is in response to comments from RBGK and Historic England that views are not of themselves heritage assets and the management of them is more to do with their context, and therefore would better sit in CC1 to enhance clarity of the policy.</p>	<p>Insert clause H of CC4 after CC1 B (and remove from CC4):</p> <p>H. Conserving and enhancing the strategic and local views identified in the Hounslow Characterisation and Growth Study and the Tall Buildings Study, or any subsequent update, that give the borough its character, visual richness and coherence; and by maintaining and updating a schedule of views;</p>	
CC4	162	HE38	<p>Historic England’s representation seeking clarity that the policy also includes non-designated</p>	<p>K. Conserve <u>the significance of heritage assets, giving great weight (and the more important the asset, the greater the weight should be) to a designated heritage asset’s conservation and</u></p>	

Section / Policy / Paragraph	Page no.	Comment ref.	Reason for modification	Agreed Suggested modification text (tracked)	Additional comments
			heritage assets. Deletion of O to avoid repetition.	<p><u>balanced weight to the conservation of a non-designated heritage asset.</u></p> <p><del>, safeguard and take opportunities to enhance any heritage asset, its historic integrity, character, appearance and its setting in a manner appropriate to its significance, giving great weight to the assets conservation and avoid any further harm to the setting, views and significance of designated heritage assets;</del></p> <p><del>O. Have full regard to any harm to, or loss of, the significance of a non-designated heritage asset, including from both direct and indirect effects. Non-designated heritage assets include locally listed buildings, Archaeological Priority Areas and areas of special local character.</del></p>	
CC4	162	HE39	To ensure consistency with national legislation and policy	<p>M. Demonstrate that substantial harm to <u>the significance of a heritage asset, either individually or cumulatively,</u> or loss of a heritage asset <del>its significance</del> is avoided in the first instance and consent will be refused, unless it can be demonstrated that the harm was necessary to achieve substantial public benefits that outweigh the harm;</p> <p>N. Demonstrate that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset <u>that cannot be avoided</u> (see Glossary), this harm <u>has been minimised and is outweighed by</u> <del>will be weighed against</del> the public benefits of the proposal, including, where appropriate, securing the site or heritage asset's optimum viable use; or</p>	

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CC4	162	HE40	Ensure that the meaning of the policy is clear	P. Be consistent with the aims of conservation of <u>the</u> heritage asset's significance, including securing its optimum viable use, <del>where both in terms of any</del> changes of use <u>that</u> are proposed and any alterations that are required resulting from the proposed use;	
CC4	162	HE42	Historic England's representation requesting amendments to ensure the plan is consistent with national policy	<p><del>CC4.R Have full regard to the significance of the heritage assets including the setting of, and views to and from, such assets; and</del></p> <p>Amend policy numbering to align with this</p> <p>CC4.B Conserving and taking opportunities to enhance the significance, <u>including any contribution made by setting,</u> <del>made</del> of the borough's network of designated and non-designated heritage assets <del>and their settings</del>, identifying new assets where appropriate and recognising the cumulative positive impact of heritage assets in a given area in consultation with the borough's local history societies and residents. We will use Article 4 directions where appropriate to enhance conservation of character or fabric;</p> <p>CC4.L: Retain, conserve, restore and reuse a heritage asset in a manner appropriate to its <del>value and</del> significance</p> <p>CC4.T: I. It is in keeping with the character of the building and harmonious with its surroundings and the wider character of the area; and, with particular respect to listed buildings or identified aspects of locally listed buildings, it <del>preserves</del> <u>conserves</u> their <del>special architectural or historic</del></p>	



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				<p><del>character and any features they may possess-</del>  <u>significance including any contribution made by their setting;</u></p> <p>CC4.T III. Opportunities to mitigate or adapt to climate change through the retention, retrofit, reuse or adaptation are maximised as long as this is not to the detriment of <del>important aspects of character-</del><u>significance;</u></p> <p>CC4.T IV That it maintains the <del>character</del>  <u>significance</u> of interiors...</p> <p>CC4.U Any development within or affecting a Conservation Area must conserve and take opportunities to enhance the <del>character</del>  <u>significance</u> of the area and respect the grain, scale, form...</p>	
CC4	162,164	HE43 HE51	<p>Historic England's representation seeks a correction to the name of the historic environment record.</p> <p>Historic England advise correction to the text that conserving a setting in situ is not meaningful and should further clarify this statement.</p>	<p>CC4.S Consult the <del>historic environment record, whoever is administering it,</del> <u>Greater London Historic Environment Record (GLHER)</u> when developing proposals.</p> <p>CC4.Z We will require any nationally important remains <del>and their settings</del> to be preserved permanently in situ, subject to consultation with <del>Historic England</del>the <u>Greater London Archaeological Advisory Service</u> as the borough's archaeological adviser. If preservation in situ is required the development proposal will need to accommodate this, <u>including an appropriate setting, public access and interpretation</u> in the design.</p>	

Section / Policy / Paragraph	Page no.	Comment ref.	Reason for modification	Agreed Suggested modification text (tracked)	Additional comments
			Historic England requests that the policy requires recording of any loss of areas of archaeological interest. This accords with NPPF 2025 para 218.	New clause after AA: <u>CC4.AB Where development will result in loss of archaeological remains, developers will be required to record and advance understanding of their significance and make this information publicly available.</u>	
6.20	165	HE44	Historic England's representation which seeks clarification that the HIAs should be undertaken by qualified professionals and understand cumulative impacts.	6.20 We will expect heritage statements to accompany all proposals affecting heritage assets and Heritage Impact Assessments to accompany all major proposals affecting heritage assets. These should include a description and understanding of the significance of any heritage assets, <u>including any contribution made by setting, and their settings</u> affected and an analysis of the resultant impact of the development on the significance of the heritage asset <del>and its setting</del> . The level of detail of this material should be proportionate to the significance of the asset affected.	
Notes	166	HE45	To raise awareness of the important considerations when adapting or retrofitting historic or traditionally constructed buildings	• Historic England has published a range of planning advice guidance documents to inform planning decisions relating to heritage assets, including the Good Practice Advice Notes and Historic England Advice Notes. <u>When proposing retrofit and adaptation of historic buildings, it is important that developers are aware of the difference between modern buildings and buildings of traditional construction (generally pre-1919). Historic England provides a wide range of guidance on 'Energy Efficiency and</u>	

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				<p><u>Retrofit in Historic Buildings' which can be found online.</u></p>	
CC4	163	HE48	<p>In response to reps from LB Richmond and Historic England that the policy text is aligned with the terminology used in the PPG in relation to WHS and their OUV. Supporting text added to clarify the policy text additions.</p>	<p>W. Conserve <del>and</del> enhance <del>and safeguard the historic integrity, character and appearance and avoid any further harm to the internationally recognised</del> the Outstanding Universal Value, <u>authenticity and integrity</u> of the Royal Botanic Gardens Kew World Heritage Site, its Buffer Zone and its significance, setting, including views to and from the site. <u>World Heritage sites are of the highest significance and their conservation should be given the greatest weight.</u></p> <p>Add in supporting text:</p> <p><u>i) Applications for development proposals that may affect the Outstanding Universal Value of the Kew World Heritage Site should be informed by a Heritage Impact Assessment Undertaken in line with the Guidance and Toolkit for Impact Assessment in a World Heritage Context (or any successor document) and engage with Historic England early in the process.</u></p> <p><u>ii) Appropriate weight will be given to implementing the provisions of the World Heritage Site Management Plan when considering planning applications.</u></p> <p><u>iii) Applications for development proposals likely to have an impact on the Royal Botanic Gardens Kew World Heritage Site or its Buffer Zone will be required to provide 3D massing models to enable assessment of cumulative impact of development where relevant.</u></p> <p><u>iv) It is expected that there will be meaningful</u></p>	

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				<p><u>engagement with the London Borough of Richmond upon Thames, Historic England and Royal Botanic Gardens Kew early in the process, and with an appropriate amount of detail accompanying an application, where development is likely to impact on the Royal Botanic Gardens Kew World Heritage Site or its buffer.</u></p> <p><u>(v) This process should involve engagement in a planning performance agreement (PPA) that sets a framework for the Council's consideration of a proposal and engagement with an appropriate Design Review Panel.</u></p>	
CC4	<b>163-164</b>	HE50	Historic England's representation seeking correction to terminology of a desk based assessment and to amend terminology of evacuation to further investigation for clarity.	<p>CC4.X: We will expect the development proposal to submit an Archaeological <del>Evaluation Report</del> <u>Desk Based Assessment (DBA)</u> if the proposal falls within or <del>adjacent to</del> an Archaeological Priority Area, with advice on the appropriate mitigation measures in cases where <del>excavation</del> <u>further investigation</u> is justified.</p> <p>CC4.BB Conserve and enhance a scheduled monument <del>and</del> <u>including any contribution made by</u> its setting if affected. Proposals must assess and submit <del>an evaluation report</del> a <u>Desk Based Assessment (DBA)</u> if the proposal affects a scheduled monument, with advice on the appropriate mitigation measures in cases where <del>excavation</del> <u>further investigation</u> is justified.</p>	
CC4	<b>164</b>	HE54	Representation from Historic England that seeks a correction to the title and	<b>REGISTERED HISTORIC PARKS AND GARDENS</b>	

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			clarification that there is one criterion requiring that non-designated parks are assessed for registration	CC4.DD. <u>Where appropriate, non-designated historic parks should be assessed for registration or local listing.</u> <del>Consider adding to the list and encouraging p</del> Conservation and enhancement of <u>historic parks and gardens</u> through appropriate management measures <u>will be encouraged.</u>	
CC4	<b>164</b>	HE55	Representation from Historic England seeking correction to title to include all heritage assets.	<del>Listed Buildings</del> <u>Heritage</u> at Risk	
CC4	<b>164-165</b>	HE56	Representation from Historic England seeking clarification in the supporting text on what the APAs are and how they are tiered.	Add new para to supporting text: <u>Archaeological Priority Areas (APAs) are defined areas where there is a significant known archaeological interest or potential for new discoveries. A total of 28 new Archaeological Priority Areas have been identified within the London Borough of Hounslow. These comprise five Tier 1 APAs, twenty-one Tier 2 APAs and two Tier 3 APAs. The tiers vary depending on the archaeological significance and potential of that area and indicate when there is a need to understand the potential impact of the proposed development on the heritage asset's significance. The type of planning application and the tier level it is in indicate the likelihood that archaeology will be a consideration in reaching a planning decision. Information on the APAs and their heritage significance can be found in the Hounslow Archaeological Priority Areas Appraisal (2023). Tier 1 APAs indicate the potential for nationally important archaeological remains which, if found,</u>	

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				<p><a href="#">would be subject to the policies for designated heritage assets in accordance with the NPPF.</a></p>	
CC4	164-165	HE57	<p>Historic England's representation that the supporting text should be expanded to explain the other designated assets that cover particular aspects of the WHS and an overview of elements of setting that contribute to the OUV of the WHS both within and beyond the buffer zone and what the arcadian Thames is and its relationship to Kew. They state that this would be in line with London Plan Policy HC2.A.</p>	<p>6.18 The borough enjoys a network of heritage assets and aspects that defines its origins and illustrates distinctiveness. A heritage asset can be a landscape, place, building, monument or feature that has been identified as having special architectural or historic interest. Within the borough, these range from Grade I statutorily Listed Buildings such as Syon House, located with other listed buildings in registered Syon Park and lying within Isleworth Riverside's designated conservation area, to individual or groups of buildings that are locally listed for their contribution to an area's character.</p> <p>Break for new para:</p> <p><a href="#">6.19</a> Outside the borough, the Royal Botanic Gardens, Kew World Heritage Site lies in the London Borough of Richmond. Its international importance is set out in the Statement of Outstanding Universal Value. and part of its buffer zone falls within the London Borough of Hounslow. <a href="#">Five attributes that contribute to the Outstanding Universal Value of the Royal Botanic Gardens, Kew WHS are set out in the Kew WHS Management Plan. Of these five, attributes i 'a rich and diverse historic cultural landscape providing a palimpsest of landscape design' and ii 'an iconic architectural legacy' engage the planning process with regard to setting.</a>  <a href="#">Policy CC4 (together with the other policies in the</a></p>	

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				<p><u>plan) are designed to protect Kew Gardens from the visual impact of tall buildings and, to a lesser extent, other impacts such as noise and traffic associated with new development.</u></p> <p>6.20 Part <u>of the Royal Botanic Gardens, Kew WHS's</u> buffer zone falls within the London Borough of Hounslow. <u>Buffer Zones are identified in the Operational Guidelines for the Implementation of the World Heritage Convention as an optional measure for protecting the OUV of World Heritage Sites. Not all World Heritage Sites have a Buffer Zone nor do all sites require them. The buffer zone of the RBG Kew WHS encompasses areas of land with strong historical relationships to the Gardens (the Old Deer Park, Syon Park and Kew Green), some locations that are important to the protection of significant views (e.g. Syon Park); and areas that have a bearing on the character and setting of the gardens (the River Thames and its islands between Isleworth Ferry Gate and Kew Bridge; and approaches to the Gardens from the east). These assets, including Royal Botanic Gardens Kew WHS all form part of the Arcadian Thames Landscape (itself a heritage asset), whose character is further detailed in the Thames Landscape Strategy. Development in and outside this Buffer Zone may threaten the setting and significance of RBGK. Furthermore, the buffer zone does not encompass all of the setting of the WHS and change outside of the buffer zone could affect the setting of the WHS.</u></p> <p>New paragraph:</p>	

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				<p>6.21 Syon Park is specifically mentioned as being the focus of one of the garden vistas on the opposite banks of the Thames. Its setting includes, affects and contributes to the borough, including Syon Park. We have a duty to assist in preserving Royal Botanic Gardens Kew's Outstanding Universal Value which includes a rich and diverse historic landscape and an iconic architectural legacy, which in turn provides <del>benefit in</del> <u>significance, including contribution made by setting to</u> <del>views and character to, and recognition of,</del> the assets of the London Borough of Hounslow.- <u>The UNESCO method of Heritage Impact Assessment for World Heritage Sites as well as the London Plan and the Mayor of London's SPG on London's World Heritage Sites will be taken into account when assessing proposals. Proposals will be carefully scrutinised for their likely effect on the Royal Botanic Gardens, Kew World Heritage Site or its setting where these occur within the defined buffer zone and wider and more extensive setting of the World Heritage Site, including views to and from the site.</u></p> <p>6.202 We will expect heritage statements to accompany all proposals affecting heritage assets and Heritage Impact Assessments to accompany all major proposals affecting heritage assets. These should include a description of the significance of any heritage assets, <u>including contribution made by setting,</u> <del>and their settings</del> affected and an analysis of the resultant impact of the development on the significance of the heritage asset <del>and its setting</del>. The level of detail</p>	



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				of this material should be proportionate to the significance of the asset affected.  Amend paragraph numbering to fit format	
CC4	166	HE59	Representation seeking correction of the primary source for the statement of OUV and that for clarity the CBA <i>Royal Botanic Gardens Kew World Heritage Site Setting Study</i> (2019) and the UNESCO (2022) <i>Guidance and Toolkit for Impact Assessments in a World Heritage Context</i> are included, along with the APA and Thames Strategies documents and any relevant LBH strategies.	The Royal Botanic Gardens Kew has published a range of guidance to inform planning decisions relating to heritage, including the Royal Botanic Gardens Kew World Heritage Site Management Plan (2020-2025) <del>Statement of Outstanding Universal Value</del> <a href="#">CBA Royal Botanic Gardens Kew World Heritage Site Setting Study (2019)</a> . <a href="#">The UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022) should be referred to for conducting and reviewing impact assessment for all World Heritage properties. Other relevant documents include the Thames Strategies and documents that are part of the Council's evidence base including Conservation Areas Appraisals, the Great West Corridor Masterplan, the Tall Buildings Study and any Heritage Impact Assessments.</a>	
CC1 Fig	170	HE60	Historic England's representation seeking a correction in reference to 'Scheduled Ancient Monuments', which should be amended to 'Scheduled Monuments' and to clarify that the map is showing just Registered Parks and Gardens. Representation also seeks that listed and	Include the APA tiers coloured to their importance  Amend key to say Scheduled Monuments  Amend key to say Registered Parks and Gardens  Add tall building higher and lower definition zones.	

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			locally listed buildings are shown on the map	(Note that Listed buildings and locally listed buildings cannot be shown on the map for presentation purposes.)	
EC4	241	HE61	In response to Historic England's representation which seeks correction of terminology related to impacts on the significance of heritage assets.	E. Demonstrate that adverse impacts <u>to the significance of</u> <del>on</del> heritage assets, <u>conservation areas, archaeological sites, and to</u> open spaces and Green Belt, areas of landscape importance and biodiversity are avoided <u>and minimised</u> ; and	
<b>Chapter 12 – Site Allocations</b>					
"Heritage Constraints" section of the following site Allocation refs: 1,2,3,4,5,6,7,8,9 10,11,13,14,16, 17,18,19,21,22, 23,25,26,27,28, 29,30,32,33,34, 35,36,37,51,52, 59,62,63,64,65, 67,69,70,72,74, 77,80,81,82,83 84,90,96,98,99 100,101,102, 103,105,106, 107,110,111, 113,114,115, 116,117,118, 122,123	258 - 452	HE63	For consistency and appropriate use of terminology  Remove the term 'preserve' from allocation wording and retain conserve and enhance in line with the NPPF and London Plan.	For the section variously titled 'Heritage', 'Heritage constraints', and 'Heritage considerations', replace with:  <u>Heritage considerations</u>  Development is required to conserve/ <del>preserve</del> , and/ <del>or</del> seek opportunities to enhance the historic environment where potential impacts upon heritage have been identified.	Further comments on individual sites are provided below  Changes discussed but not agreed are summarised in Appendix B
"Heritage Constraints" section of site Allocation ref 1 Sky Campus	258	HE63	For correction – to remove duplicated text.	Final sentence of heritage constraints section: <del>Development is required to conserve/preserve, and/or seek opportunities to enhance the historic environment where potential impacts upon heritage have been identified.</del>	Changes discussed but not agreed are summarised in Appendix B

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Site Allocation 2 Tesco Osterley – “Heritage” section	260	HE64	To ensure that the plan is justified, effective and consistent with national policy	Amend text: Policy CC3 sets out appropriate heights for the site. Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 3 Gillette Corner – “Heritage Constraints” section	262	HE64	To ensure the plan is justified and effective	Amend text: Policy CC3 sets out appropriate heights for the site. Further details on the assessment of appropriate heights are set out in <del>the Tall Building Study and</del> the Great West Corridor Masterplan.	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 5 West Cross Campus – “Heritage Constraints” section	266	HE64	To ensure the plan is justified and effective	Amend text: Further details on the assessment of appropriate heights are set out in <del>the Tall Building Study and</del> the Great West Corridor Masterplan.	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 6 BSS Brentford – “Heritage Constraints” section	268	HE64	To ensure the plan is justified and effective	Amended text: Policy CC3 sets out appropriate heights for the site. Further details on the assessment of appropriate heights are set out in <del>the Tall Building Study and</del> the Great West Corridor Masterplan.	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 7 Profile West – “Heritage Constraints”	270	HE64	To ensure the plan is justified and effective	Amended text: Policy CC3 sets out appropriate heights for the site. Further details on the assessment of appropriate heights are set out in <del>the Tall Building Study and</del> the Great West Corridor Masterplan.	Changes discussed but not agreed are summarised in Appendix B
Site Allocation ref 9 – “Key proposal” section	274	HE63	For correction – to remove the term ‘protect’ from allocation wording and replace this with conserve, in line with the NPPF and London Plan.	The Syon Lane Industrial Estate will be redeveloped to increase industrial uses on the site while <del>protecting</del> <u>conserving</u> the Grade II listed Syon Clinic building.	

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Site Allocation 11 Homebase – “Heritage Constraints”	278	HE64	To ensure the plan is justified and effective	Amend text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study</del> and the Great West Corridor Masterplan.	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 13 Harlequin Av Substation “Heritage Constraints”	280	HE64	To ensure the plan is justified and effective	Amend text  Further details on the assessment of appropriate heights are set out in <del>the Tall Building Study</del> and the Great West Corridor Masterplan.	
Site Allocation 16 Brentside Park – “Heritage Constraints”	284	HE64	To ensure the plan is justified and effective	Amend text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study</del> and the Great West Corridor Masterplan.	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 17 Great West Plaza – “Heritage Constraints”	286	HE64	To ensure the plan is justified and effective	Amend text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study</del> and the Great West Corridor Masterplan.	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 18 Great West House – “Heritage Constraints”	288	HE64	To ensure the plan is justified and effective	Amend text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study</del> and the Great West Corridor Masterplan.	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 19 Mille Building – “Heritage Constraints”	290	HE64	To ensure the plan is justified and effective	Add text: <a href="#">Policy CC3 sets out appropriate heights for the site. Further details on the assessment of appropriate heights are set out in the Great West Corridor Masterplan.</a>	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 25 Layton Road – “Heritage Constraints”	297	HE64	To ensure the plan is justified and effective	Amend text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study</del> and the Great West Corridor Masterplan.	
Site Allocation 26 Phoenix Business Park “Heritage Constraints”	299	HE64	To ensure the plan is justified and effective	Amend text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study</del> and the Great West Corridor Masterplan.	Changes discussed but not agreed are summarised in Appendix B

Section / Policy / Paragraph	Page no.	Comment ref.	Reason for modification	Agreed Suggested modification text (tracked)	Additional comments
Site Allocation 27 Kew Bridge Distribution Centre – “Heritage Constraints”	302	HE64	To ensure the plan is justified and effective	Amend text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study</del> and the Great West Corridor Masterplan.	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 29 EMC Tower – “Heritage Constraints”	306	HE64	To ensure the plan is justified and effective	Amend text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study</del> and the Great West Corridor Masterplan.	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 30 Vantage West – “Heritage Constraints”	308	HE64	To ensure the plan is justified and effective	Amend text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study</del> and the Great West Corridor Masterplan.	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 32 Brentford Fountain Leisure Centre – “Heritage Constraints”	310	HE64	To ensure the plan is justified and effective	Amend text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study</del> and the Great West Corridor Masterplan.	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 33 Esso Chiswick Roundabout – “Heritage Constraints”	312	HE64	To ensure the plan is justified and effective	Amend text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study</del> and the Great West Corridor Masterplan.	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 34 Former Natwest Chiswick – “Planning Designations”	313	HE64	For consistency with other sites and national policy	New text: <u>The site is part of an Archaeological Priority Area; a desk based archaeological assessment will be required, the results of which may lead to further investigation being necessary, see Local Plan Policy CC4 or any subsequent policy.</u>	
Site Allocation 34 Former Natwest Chiswick – “Heritage Constraints”	314	HE64	To ensure the plan is justified and effective	Amend text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study</del> and the Great West Corridor Masterplan.	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 35 B&Q Chiswick – “Planning Designations”	315	HE64	For consistency with other sites and national policy	New text: <u>The site is part of an Archaeological Priority Area; a desk based archaeological assessment will be required, the results of which may lead to further investigation being necessary, see Local Plan Policy CC4 or any subsequent policy.</u>	

Section / Policy / Paragraph	Page no.	Comment ref.	Reason for modification	Agreed Suggested modification text (tracked)	Additional comments
Site Allocation 35 B&Q Chiswick – “Heritage Constraints”	316	HE64	To ensure the plan is justified and effective	Amend text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study</del> and the Great West Corridor Masterplan.	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 37 Gunnersbury Station CP – “Heritage Constraints”	320	HE64	To ensure that the plan is justified and effective	Amend text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study</del> and the Great West Corridor Masterplan.	
Site Allocation ref 72 “Site requirements” section	364	HE63	For correction – to remove the term ‘protect’ from allocation wording and replace this with conserve, in line with the NPPF and London Plan.	Amend text: Development should <del>protect</del> conserve and enhance the spire and its setting and provide a high quality design which is equivalent to the tower’s importance at the end of key views in Feltham	
Site Allocation 77 “Planning Designations” section	373	HE64	For consistency with other sites and national policy	New text: <u>The site is part of an Archaeological Priority Area; a desk based archaeological assessment will be required, the results of which may lead to further investigation being necessary, see Local Plan Policy CC4 or any subsequent policy.</u>	
Site Allocation 84 “Planning Designations” section	383	HE64	For consistency with other sites and national policy	New text: <u>The site is part of an Archaeological Priority Area; a desk based archaeological assessment will be required, the results of which may lead to further investigation being necessary, see Local Plan Policy CC4 or any subsequent policy.</u>	
Site Allocation 84 “Key proposal” section	384	HE63	For correction – to remove the term ‘protect’ from allocation wording and replace this with conserve, in line with the NPPF and London Plan.	Amend text: Hounslow Cavalry Barracks will be redeveloped to provide a new residential area which <del>protects</del> conserves and enhances the historic buildings, and introduces a range of new uses to the site to support new homes.	
Site Allocation 85 “Planning Designations” section	385	HE64	For consistency with other sites and national policy	New text: <u>The site is part of an Archaeological Priority Area; a desk based archaeological assessment</u>	

Section / Policy / Paragraph	Page no.	Comment ref.	Reason for modification	Agreed Suggested modification text (tracked)	Additional comments
				<u>will be required, the results of which may lead to further investigation being necessary, see Local Plan Policy CC4 or any subsequent policy.</u>	
Site Allocation 96 “Planning Designations” section	<b>403</b>	HE64	To ensure that the plan is justified, effective and consistent with national policy	Amended text: Site <del>is adjacent to</del> <u>located in</u> Isleworth Riverside conservation area.  New text: <u>The site is located in the Royal Botanic Gardens, Kew World Heritage Site - Buffer Zone and should be designed to avoid harm to the Outstanding Universal Value of the World Heritage Site.</u>	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 98 Osterley Station CP - “Heritage Considerations” section	<b>408</b>	HE63	For correction – to remove the term ‘protect’ from allocation wording and replace this with conserve, in line with the NPPF and London Plan.	Amend text: Any development should <u>conserve</u> <del>protect</del> and enhance the existing listed station building and its setting through a high-quality design which <u>conserves</u> <del>protects</del> views of the station tower.	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 98 Osterley Station CP - “Site requirements” section	<b>408</b>	HE63, HE64	For correction – to remove duplicated text.	<del>Any development should protect and enhance the existing listed station building and its setting through a high-quality design which protects views of the station tower.</del>	
Site allocation 113 69-77 Boston Manor Road – “Planning Designations”  “Heritage Concerns” and  “Site requirements” section	<b>429</b>    <b>430</b>	HE63, HE64	Correction to planning designations    Corrections to Heritage constraints	Amend text: Listed Buildings: <del>69-77 Prospect House, and No.s 69 and 71, and 73 and 75</del> <u>69-77 Prospect House, and No.s 69 and 71, and 73 and 75</u> Boston Manor Road <del>is are</del> <u>are</u> Grade II Listed; development should seek to conserve and enhance the buildings <u>and</u> <del>its</del> <u>their</u> settings.  <ul style="list-style-type: none"> <li>Grade II Listed Prospect House; Grade II <del>Listen 69-75</del> <u>listed No.s 69 and 71, and 73 and 75</u> Boston Manor Road;</li> </ul>	



Section / Policy / Paragraph	Page no.	Comment ref.	Reason for modification	Agreed Suggested modification text (tracked)	Additional comments
			To ensure that the plan is justified and effective  For correction – to remove the term ‘protection’ from allocation wording and replace this with conservation, in line with the NPPF and London Plan.	Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study</del> and the Great West Corridor Masterplan.  Redevelopment of site to introduce residential uses alongside <del>protection</del> conservation and enhancement of Listed Buildings for business use or further education use.	
Site Allocation 114 Royal Mail Hounslow – “Planning Designations”	431	HE64	For consistency with other sites and national policy	Archaeological Priority Area: The site is part of an Archaeological Priority Area; <u>a desk based archaeological assessment will be required, the results of which may lead to further investigation being necessary, see Local Plan Policy CC4 or any subsequent policy.</u> <del>Development should consider the impact on this designated heritage asset.</del>	Changes discussed but not agreed are summarised in Appendix B
Site allocation 117 “Site requirements” section	437	HE63	For correction – to remove the term ‘protect’ from allocation wording and replace this with conserve, in line with the NPPF and London Plan.	Creative, decorative lighting and focal points of urban art and similar will <del>protect</del> conserve and enhance the character of the town centre where appropriate.	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 118 Former GSK – “Heritage Constraints”	441	HE64	To ensure the plan is justified and effective	Amend text: Further detail on the assessment of appropriate heights are set out in <del>the Tall Buildings Study</del> and the Great West Corridor Masterplan.	Changes discussed but not agreed are summarised in Appendix B
Site Allocation 120 – Land north of Church Rd “Planning Designations”	445	HE64	For consistency with other sites and national policy	New text: <u>The site is part of an Archaeological Priority Area; a desk based archaeological assessment will be required, the results of which may lead to further investigation being necessary, see Local Plan Policy CC4 or any subsequent policy.</u>	
Policy Map	-	HE68	Historic England commented on the content of the policy	LBH agree to include Kew WHS buffer zone, and the tiered APAs.	



Section / Policy / Paragraph	Page no.	Comment ref.	Reason for modification	Agreed Suggested modification text (tracked)	Additional comments
			map and requested that listed buildings, scheduled monuments, locally listed buildings and Kew WHS buffer zone are added.	However, the other designations here are better presented in the policy chapter for legibility purposes.	

## APPENDIX B: Table of Outstanding Matters

Description of matter/s which remains outstanding	LBH comments	Historic England comments	Agreed next steps
<p><b>HE20:</b> Policy CC3.J sets out two definitions for tall buildings in the borough and the areas in which they apply are mapped on Figure CC3.I/Figure 5.2. This indicates that Feltham, Hounslow, and Brentford are areas in which the higher scale tall building definition of 30m is applicable. However, the individual heights then given to the tall building sites identified in these areas are, in some instances, lower than the higher scale tall building definition of 30m (e.g. F3, F5, HW1, and HW2, etc). Clarification is sought on this discrepancy and whether the higher definition is in fact justified.</p>	<p>Only a small area of Feltham is included within higher scale definition (as per the map), so F2, F4 &amp; F5 are included as they meet the lower scale definition and are in this area. Heights of buildings in Hounslow all meet the higher scale definition. Brentford site sits just outside the higher scale definition. Hounslow West is in lower scale area and therefore heights stated are tall buildings. It is an acceptable approach to suggest multiple tall building definitions within the borough, as per the Characterisation and Growth LPG, which states '2.4.3 The whole borough needs to be covered by a tall building definition and this should be shown on a digital map. Often this can be in the form of one borough-wide definition; but where considerable variations in context heights exist, different definitions can be used for different regions to reflect ranges in building height across the borough.' As shown through the GWC has a different height context to the rest of the borough as a whole and therefore it is not appropriate to have the same definition in this region. As the GWC is an opportunity area, having a lower definition would likely mean that a high number of proposals would be considered tall buildings and as such be required to be assessed against CC3. Buildings of between 6-10 stories are subject to the other design and conservation policies in the plan</p>	<p>Noted</p>	<p>The parties agree to present this matter to the Inspectors for their consideration as part of the examination process.</p>

Description of matter/s which remains outstanding	LBH comments	Historic England comments	Agreed next steps
<p><b>HE63:</b> For clarity and conformity, we advise that the more generic 'Heritage Constraints' sections are amended as follows: The section should open with a sentence stating that: 'The significance of the following heritage assets could be affected by development:' The largely generic list of potential heritage impacts to significance, setting and fabric can then be removed. References to 'preserve' should be removed as per HEI. Proposals should be required to demonstrate that alternative building typologies and configurations have been considered (as per London Plan Policy D3.A and D9.C(d)); that heritage significance has informed proposals from the outset (in line with the design-led approach and HIA good practice); and that harm has been avoided and minimised (in line with the NPPF and CC4).</p>	<p>Suggested policy changes are presentational and not considered necessary for the soundness of the plan.</p>	<p>HE continues to request focused changes for some individual site allocation policies that will be reflected, where appropriate, in Hearing Statements.</p>	<p>The parties agree to present this matter to the Inspectors for their consideration as part of the examination process.</p>
<p><b>HE64:</b> To ensure that the plan is justified (NPPF paras. 31 &amp; 35), sets out a positive strategy for the conservation and enjoyment of the historic environment that delivers benefits in terms of local character and distinctiveness (NPPF paras. 20 -21 &amp; 195-196) and conforms with the London Plan (Policies D1.A(7), D.3A, and HCl.B-C), we strongly advise that HIAs are undertaken for Site Allocations with heritage sensitivities. The HIAs should be undertaken in line with HE and</p>	<p>Policy changes are not considered necessary for the soundness of the plan. There is no legal or policy requirement for a HIA to support site allocations. It is not practicable to undertake a HIA for all site allocations. The policies are drafted so that the onus to undertake HIAs is on the applicant during application stage.</p>	<p>In lieu of HIAs, HE continues to request focused changes to individual site allocation policies to more consistently identify the key heritage assets that may be impacted.</p>	<p>The parties agree to present this matter to the Inspectors for their consideration as part of the examination process.</p>

<b>Description of matter/s which remains outstanding</b>	<b>LBH comments</b>	<b>Historic England comments</b>	<b>Agreed next steps</b>
<p>UNESCO guidance, as relevant, and should consider cumulative effects (as per HCIC). It is important that the findings of the HIAs inform the site allocation policies, along with any other relevant historic environment evidence base (e.g. the tall building study, masterplans and characterisation study) as these highlight local historic landmarks, important views that relate to the significance of assets, etc. Currently, the historic environment information included in the Site Allocations 'Heritage Constraints' section is inconsistent and does not always identify heritage assets with the potential to be harmed, for example, there are some sites where Kew Garden WHS and the other designated assets within it, would be a consideration but are not mentioned. Similarly, where assets are identified it does not then identify if there is a particular risk to their significance and how to avoid it (e.g. SA3 should highlight that development needs to respond to and respect the landmark status of the Gillette Tower by being deferential in height).</p>		<p>As it has not been possible to agree all suggested changes, these will be reflected where appropriate in Hearing Statements.</p>	
<p>Through DtC engagement between both parties since HE's Regulation 19 response was received, HE has disagreed with a modification that has been agreed within a SoCG between LBH and the Mayor of London/GLA (examination library document EX5e, agreed 06/10/2025). This relates</p>	<p>LBH consider that the modification agreed with the Mayor of London/GLA would serve to better align policy CC3 with London Plan policy D9. This modification would ensure policy CC3 is in general conformity with the London Plan and thus represents a sound approach.</p>	<p>HE does not agree with this modification and has instead suggested this be modified to read 'Maximum appropriate heights... subject to site-</p>	<p>The parties agree to present this matter to the Inspectors for their consideration as part of the examination process.</p>

<b>Description of matter/s which remains outstanding</b>	<b>LBH comments</b>	<b>Historic England comments</b>	<b>Agreed next steps</b>
<p>to the title of and headings within Table CC 3.2 of Policy CC3 (referred to in clause L). The policy in the submitted version of the HLP referred to 'Maximum permissible heights', however the Mayor of London/GLA requested this be amended through a modification to read 'Appropriate heights' in order to better reflect London Plan policy D9.</p>		<p>specific impact assessments'.</p> <p>HE also requests that the title of table CC3.2 is changed to: 'Maximum Appropriate Building Height'</p>	
<p><b>HE64:</b> Through DtC engagement between LBH and HE since HE's Regulation 19 response was received, HE presented LBH with a list of site allocations and particular heritage assets within their vicinity that should be referred to in the Heritage Constraints section of the allocations. These include the following allocation ref numbers: 1, 2, 3, 5, 6, 7, 11, 16, 17, 18, 19, 23, 26, 27, 28, 29, 30, 32, 33, 34, 35, 52, 69, 70, 96, 110, 111, 114, 117, 118</p>	<p>It's noted that HE requested a number of modifications to various site allocations through the DtC process, however, LBH consider that these modifications are not required as a matter of soundness. Impacted site allocations include requirements for developers to undertake a detailed HIA as part of the application process. Furthermore, LBH has justified the approach taken in the Design and Heritage Background Paper (doc ref EBCC1)</p>	<p>In lieu of HIAs, HE continues to request focused changes to individual site allocation policies to more consistently identify the key heritage assets that may be impacted.</p>	<p>The parties agree to present this matter to the Inspectors for their consideration as part of the examination process.</p>
<p><b>HE64:</b> Through DtC engagement between LBH and HE since HE's Regulation 19 response was received, HE requested a proposed modification to the heritage constraints section of site allocations 2 (Tesco Osterley), 11 (Homebase Osterley) and 110 (Albany Riverside) to include wording that states that any future proposal should explore lesser heights to reduce harm. HE has also queried references to the Tall Building</p>	<p>LBH does not agree to the proposed change. It is not considered to pass the justified test to add additional requirements for building heights in the site allocation wording. Where a tall building is proposed, the appropriate heights are considered in the Tall Buildings Study or Great West Corridor Masterplan (whichever is applicable to the specific site), and the appropriate heights for the site are set out in Policy CC3.</p>	<p>Where appropriate, matters not agreed through the DtC process will be included in Hearing Statements.</p>	<p>The parties agree to present this matter to the Inspectors for their consideration as part of the examination process.</p>

<b>Description of matter/s which remains outstanding</b>	<b>LBH comments</b>	<b>Historic England comments</b>	<b>Agreed next steps</b>
Study as evidence to inform building heights on certain sites that do not include tall buildings.			