

Hounslow Local Plan (2020-2041)

Examination Matters, Issues and Questions

Matter 2: Spatial Strategy and Strategic Policies

London Borough of Hounslow Council Response

12th December 2025



**London Borough
of Hounslow**

Council's Response to Inspectors' Matters, Issues, Questions

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?

Q1) Does the Plan's vision and key objectives provide a positively prepared and justified approach for Hounslow's future growth?

Q1) LBH response:

1. Yes, the Plan, through its vision and eight objectives, together with a policy framework of 64 policies, forms the strategy for managing sustainable growth, setting out where and how development will be delivered to meet the needs of communities, address climate change and enhance the built and natural environment in the borough. The Plan is positively prepared and is consistent with achieving sustainable development, providing allocations to fully meet the London Plan 2021 (**ADP1**¹) housing targets and to meet a significant portion of the identified employment requirements.
2. The Plan presents an appropriate strategy that is based upon proportionate evidence and has taken account of reasonable alternatives. Policies plan for the two Opportunity Areas within the borough, setting out how sustainable growth in these areas will be delivered, including through significant infrastructure improvements. Policies P1, P1a), P1b) and P1c) set out the strategy for the Great West Corridor, which is justified through the significant masterplanning work undertaken for this area (**EBCC4**²). Growth in the Heathrow Opportunity Area is planned for through policies P2, P2 (a), P2 (b) and P2(c). The policies have been assessed throughout the Plan via the Integrated Impact Assessment (IIA) (Documents **S3**³, **S4**⁴ & **S5**⁵) and this has influenced the plan-making process with a view to avoiding and mitigating negative impacts so as to maximise the Plan's contribution to sustainable development.

¹ ADP1- [London Plan 2021](#)

² EBCC4- [Great West Corridor Masterplan – Revision \(2020\)](#)

³ S3- [Hounslow Local Plan Review Integrated Impact Assessment Report](#)

⁴ S4- [Hounslow Local Plan Review Integrated Impact Assessment Non-technical Summary](#)

⁵ S5- [Hounslow Local Plan Review Integrated Impact Assessment Technical Annex](#)

Q2) Does the Plan as submitted appropriately identify “strategic policies” or are the Council’s proposed modifications necessary for soundness?

Q2) LBH response:

3. The Council refers to Document **EX3**⁶, which recommends a modification to the Plan to include an additional appendix, i.e. Appendix 5, that identifies which policies in the Plan are strategic, to ensure consistency with national policy. Consequently, the Council considers that this proposed modification is necessary for soundness.

Q3) Is the Plan consistent with the Framework which expects strategic policies to look ahead over a minimum 15-year period from adoption?

Q3) LBH response:

4. Yes, the Plan covers the period 2020-2041. The Local Development Scheme (LDS) (**ORD2**⁷) sets out an indicative timeline for adoption of the Plan in 2026, which ensures that the ensuing 15 years from adoption up to 2041 are planned for through the strategic policies.

Q4) 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?

Q4) LBH response:

5. The Spatial Strategy presents a place-based approach to growth and is broken down into 10 districts informed by the 10 study areas established in the Borough’s Characterisation and Growth Study (**EBCC2**⁸). The London Plan 2021 (**ADP1**) designates

⁶ EX3- [Suggested Modification to make explicit which policies are strategic \(August 2025\)](#)

⁷ ORD2- [Local Development Scheme \(March 2025\)](#)

⁸ EBCC2- [Hounslow Characterisation and Growth Study \(2024\)](#)

two Opportunity Areas within the borough; the Great West Corridor (GWC) Opportunity Area and the West of the Borough (WoB) Opportunity Area (the part of the Heathrow Opportunity Area that falls within Hounslow Borough).

6. Through the Site Assessment and Capacity Study 2024 (SACA) (Document **EBSC2**⁹), the Council has established a clear understanding of the land available in the borough for housing and employment, and establishes the development potential for these uses. The SACA has established where the scope for site delivery is, which is reflected in the focus on the Opportunity Areas and town centres as key to delivering growth.
7. The Spatial Strategy is therefore focussed on growth within these Opportunity Areas, with a brownfield first approach, and within other sustainable locations, such as the borough's town centres in accordance with Policy GG2 of the London Plan (**ADP1**). The Spatial Strategy includes eight policies that set out how growth should be delivered in the two Opportunity Areas in accordance with Policy SD1 of the London Plan. The Spatial Strategy considers the other districts each in turn, setting out a spatial portrait and outline of key objectives the Council seeks to see achieved, including from development, where appropriate.
8. Within the WoB Opportunity Area, a key factor influencing the distribution of growth is the Green Belt. The borough's Employment Land Review Update (**EBED1**¹⁰) clearly highlights that land is required within the West of Borough area to accommodate growth associated with large format logistics and distribution, much of which is linked to activities at Heathrow Airport. More land is therefore required in proximity to the airport for businesses reliant on it. A Green Belt Review, encompassing an assessment of the Green Belt (**EBGB5**¹¹ and **EBGB4**¹²) and an assessment of whether exceptional circumstances were demonstrated to justify release (**EBGB1**¹³), was undertaken to identify sites to deliver additional industrial floorspace in order to help alleviate the shortfall of employment land, meaning that some selective and limited alterations have been made to Green Belt boundaries to accommodate this growth.

⁹ EBSC2- [Hounslow Site Allocations and Capacity Assessment \(SACA\) \(2024\)](#)

¹⁰ EBED1- [Hounslow Site Allocations and Capacity Assessment \(SACA\) \(2024\)](#)

¹¹ EBGB5- [LBH Green Belt Review Stage 1 \(2015\)](#)

¹² EBGB4- [LBH Green Belt Review Stage 2 \(2019\)](#)

¹³ EBGB1- [Green Belt Background Paper \(Incorporating Exceptional Circumstances Assessment\) \(June 2025\)](#)

9. The spatial distribution of growth in the GWC is shaped by the area's rich heritage assets within and in proximity to the OA. London Plan (**ADP1**) Policy D9 requires boroughs to determine where tall building development is appropriate. The Great West Corridor Masterplan (**EBCC4**) and associated Views Appendix (**EBCC4a**¹⁴) determines where tall building development is appropriate, justifying the distribution of growth in a way that conserves and enhances heritage assets.
10. The Council refers to the Local Transport Impact Assessment (**EBEC2**¹⁵) and Addendum (**EBEC2a**¹⁶) for an assessment of the effects on highways, with mitigation measures considered. The studies conclude that the mitigation measures planned are likely to improve network conditions, reduce the impact of Local Plan development and that the Local Plan will not have any severe or unacceptable safety impacts on the strategic road network.

Q5) What alternative options for the spatial strategy were considered?

Q5) LBH response:

11. The IIA (**S3**) sets out how the reasonable alternatives (RAs) were established at chapter 4. This included RAs around the following spatial strategy themes: housing growth options (section 4.3, pp.12-13), employment growth options (section 4.4, pp14-15); options relating to tall buildings (section 4.5, p.15); and transport options (section 4.6, p.16). The IIA then provides a summary of the appraisal findings for each of the options tested at chapter 5.

Q6) Why was the approach of the submitted Plan chosen and is it an appropriate strategy having regard to reasonable alternatives?

Q6) LBH response:

¹⁴ EBCC4a- [LBH Great West Corridor Masterplan - Views Appendix \(2020\)](#)

¹⁵ EBEC2- [Hounslow Local Transport Impact Assessment Update \(2024\)](#)

¹⁶ EBEC2a- [Hounslow Local Transport Impact Assessment Update - Addendum \(2025\)](#)

12. The London Plan 2021 (**ADP1**) designates two Opportunity Areas within the borough; the Great West Corridor (GWC) Opportunity Area and the West of the Borough (WoB) Opportunity Area (the part of the Heathrow Opportunity Area that falls within Hounslow Borough), giving a strong steer for the Plan's Spatial Strategy and where growth should be focussed. Document **S3** provides an overview of the Council's reasons for selecting the preferred approach in light of the findings of the reasonable alternatives assessment at chapter 6 (pp.52-54). The IIA demonstrates that, when considering all the reasonable alternatives tested, the chosen spatial strategy approach represents an appropriate strategy as per NPPF (**ORD3**¹⁷) paragraph 35.

Q7) 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?

Q7) LBH response:

13. Strategic Policy SC1 is clear about the number of new homes to be delivered across the plan period, with part A detailing the quantum of homes to be delivered in each for the Opportunity Areas. Policy ED1 is clear about the amount of employment development envisaged across the borough over the Plan period, with part D breaking the figure into the quantum for the west of the borough and the remainder of the borough, and into industrial and office floorspace. Strategic policies in the Spatial Strategy section of the policy (i.e. for the GWC and West of the Borough, broken down into constituent places) provide accompanying maps to show spatially where site allocations are located, in addition to other planned development. The other districts are not dealt with through policies but are also accompanied by maps that show the spatial distribution of site allocations.

Q8) 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?

¹⁷ ORD3- [National Planning Policy Framework December 2023](#)

Q8) LBH response:

14. The NPPF (**ORD3**) at paragraph 67 requires strategic policies to set out a housing requirement for designated neighbourhood areas. The neighbourhood areas in question were designated in 2013, 2016 and 2018 respectively. There has been no progress with neighbourhood plans for any of these areas and the neighbourhood forum designations are now expired. The Council considers that strategic boroughwide policies provide a sufficiently positive framework to support the delivery of homes in the eventuality that any new neighbourhood forums may be established that may bring forward neighbourhood plans for neighbourhood areas.

Q9) 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?

Q9) LBH response:

15. Yes, the Council refers to paragraphs 3.12-3.14 of the SACA (**EBSC2**) for a synopsis of how allocated sites were assessed in regard to flood risk and how a sequential, risk-based approach to the location of development was applied.

Q10) 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)?

Q10) LBH response:

16. In order to be allocated, all sites that were submitted to the Council had to meet three tests (i.e. whether they are available, suitable and achievable). Every site that met these tests was taken forward for allocation assessment as is shown in the SACA 2024 (**EBSC2**). These were then subject to the sequential approach, with each site being

subject to the sequential test (**EBEQ1**¹⁸). Where identified to be necessary in accordance with the screening, a Strategic Flood Risk Assessment (SFRA) Level 2 Site Assessment was carried out to provide the information necessary for application of the Exception Test (**EBEQ2b**¹⁹).

Q11) 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?

Q11) LBH response:

17. Yes, the NPPF (**ORD3**) requires local authorities to develop strategic policies that enable the provision of infrastructure (paragraph 20). The Council has developed and maintains its Infrastructure Delivery Plan (IDP) (**EBID1**²⁰), a 'living' document that provides necessary information on the physical, green and social infrastructure that is required to support the growth and development needs of the borough. **EBID1** assesses areas of infrastructure in terms of current provisions and the requirements to meet future change and growth.
18. Infrastructure considered by the IDP includes Climate, Energy and Utilities (Section 5.1), which covers telecommunications, water supply and wastewater and waste management; Green and Blue Infrastructure (Section 5.2); Leisure, Physical Activity and Sport (Section 5.3); Community Hubs and Localities (Section 5.4); Heritage, Arts and Culture (Section 5.5); Education (Section 5.6); Health (Section 5.7); Transport (Section 5.8), which covers highways; and Emergency Services and Community Safety (Section 5.9), which covers security.

¹⁸ EBEQ1 [LB Hounslow Flood Risk Sequential and Exceptions Tests \(2024\)](#)

¹⁹ EBEQ2b- [LB Hounslow Strategic Flood Risk Assessment Level 2 - Addendum: Site Assessment for Albany Riverside \(2025\)](#)

²⁰ EBID1- [Hounslow Infrastructure Delivery Plan \(May 2025\)](#)

19. Mitigation measures to ensure adverse impacts are minimised are set out in the respective sections. **EBID1** considers the future planned population growth of the borough and the Plan's overall Spatial Strategy within its assessments.
20. The impact of future development on the highway network has been evaluated through transport modelling. The Council refers to the Local Transport Impact Assessment (**EBEC2** and **EBEC2a**) where analysis included a mitigation scenario outlined. The scenario considered improvements such as enhanced bus services, travel demand management, more efficient car use, rail and tube options, and optimising traffic signals at busy junctions. The Council does not plan to increase highway capacity; instead, these flexible mitigation measures, together with other actions aligned with the London Plan, Mayor of London's Transport Strategy (MTS) (**EX1.64**²¹), and Local Plan policies, aim to reduce expected traffic levels. Every relevant development will need to carry out a Transport Assessment, including detailed transport modelling, to identify and address any further areas that may require additional mitigation.

Q12) 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)?

Q12) LBH response:

21. The SACA (**EBSC2**) has undertaken a risk assessment as per national planning guidance. The electrical capacity constraints issue in West London has been identified as a risk, however the assessment notes that there are a number of mitigation measures, including interim measures to facilitate scheme connections, which have been put in place to ensure this matter would not affect the timely delivery of housing sites in the borough (see pp. 23-25). As the same interim solutions are available for proposed employment sites, it is not anticipated that the issue would adversely impact

²¹ EX1.64 – [Mayor of London's Transport Strategy \(2018\)](#)

employment growth either. All allocation information has been shared with The Mayor's Infrastructure Coordination Service and the District Network Operator, ensuring that these developments will benefit from assistance to establish timely connections to the grid.

22. It should also be noted that the Council has led on the production of a sub-regional Phase 1 Local Area Energy Plan (Doc **EBEQ6**²²) to ensure impacts on the local electricity network are understood, and to establish a range of actions to unlock growth and achieve local net zero aims in future.

23. The Council refers to Local Plan policy IMP3 clauses J and M which seek to address this issue.

Q13) 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?

Q13) LBH response:

24. Yes. The Great West Corridor (GWC) Opportunity Area boundary reflects the scope and location of sites available for redevelopment to provide new homes and jobs in this part of the borough. The Heathrow Opportunity Area is focused on the west of the borough close to the airport, but also spans an area within neighbouring Hillingdon borough (Heathrow Airport is located within Hillingdon Borough but immediately adjacent to the Borough of Hounslow). It includes Feltham Town Centre, where there are a number of development opportunities, and industrial areas close to Heathrow airport.

²² EBEQ6- [West London Local Area Energy Plan \(LAEP\): Phase 1 \(2023\)](#)

25. The Mayor, in his response to the Plan (Document **S9**²³, REP074) and Statement of Common Ground (**EX5e**²⁴), has not raised any general conformity issues in relation to the boundaries and scope of the Opportunity Areas.

Q14) 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?

Q14) LBH response:

26. The Great West Corridor (GWC) is historically a key strategic employment location in West London, with a number of major firms being located here, alongside a broad range of businesses of various sizes and types. Reflecting this historic role, the London Plan (ADP1) clearly envisages major economic growth as well as housing growth in the area (as indicated in Figure 2.10 of the Plan), and the Mayor has also designated the area as a Creative Enterprise Zone.

27. The London Plan provides an indicative jobs growth figure for the GWC, which is referenced in the supporting text of the Local Plan (paragraph 2.44), albeit this is not used as a target in the policy for the reasons outlined in the Council's response to Matter 4, Issue 1, Question 3. The Council's Employment Land Review (**EBED1**), identifies that there is a significant demand for additional employment space in the borough (i.e. 208,200 sqm of net additional industrial floorspace outside the west of the borough and 204,621 sqm of additional office floorspace across the borough), with a significant portion of this being derived from businesses operating in this area, such as the creatives and media sectors. Reflecting this, the GWC Masterplan (**EBCC4**) identifies opportunities to intensify and widen the variety of employment space in the

²³ S9 [Link to Representations made pursuant to Regulation 20 \(in response to consultation at Regulation 19 Stage\)\(Redacted\)](#)

²⁴ EX5e- [Statement of Common Ground between LB Hounslow and the Mayor of London \(October 2025\)](#)

area, a process which is reflected in the Site Allocations and Capacity Assessment (SACA) (**EBSC2**) and in turn fed into the site allocations set out in the Plan. Collectively, these will deliver significant floorspace in the industrial and offices use classes to provide space for these growth sectors.

Q15) 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?**

Q15a) LBH response:

28. Yes. The Council refers to its answer to question 12 in relation to the Great West Corridor (GWC) boundary. The GWC is an extensive area with distinct quarters, and therefore the West, Central and East policies have been written to reflect the different roles and priorities in each sub-area (reflected in the vision section of the GWC Masterplan) (**EBCC4**) (section 5.0), and to make the policies concise and effective in their implementation.

29. The Mayor, in his response to the Plan (REP074) and Statement of Common Ground (**EX5e**), has not raised any general conformity issues in relation to the boundary of the Opportunity Areas.

- 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?**

Q15b) LBH response:

30. It is a requirement of development proposals that they are in compliance with relevant development plan policies (including the London Plan as part of the adopted

development plan), as per the Town and Country Planning Act 1990 Section 70 2(a). It is not considered necessary to state explicitly that applications are subject to other relevant statutory development plan, i.e. the Local Plan and London Plan policies.

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?

Q15c) LBH response:

31. The River Brent Quarter encompasses two allocations (16 Brentside Park and 17 Great West Plaza). Brentside Park has a retail minimum development quantum (MDQ) of 530 sqm whilst Great West Plaza has a retail MDQ of 360sqm with the retail element of both of these allocations described as ancillary to the wider use.

32. As set out in policy TC3, the locally set threshold for requiring impact assessments for retail proposals outside centres is 500 sqm. However, these sites are allocations and not stand-alone planning applications, and they are designed to support the mixed-use nature of the allocations. This is set out in supporting text to Policy P1 (at paragraph 2.51), which states: “Supporting uses and activities including retail, leisure and residential are essential to help deliver a successful business hub as an enhanced mix of uses will generate activity and vitality throughout the day and early evening, reduce the need to travel and enhance the viability of uses, facilities and services within nearby local centres and high streets”.

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?

Q15d) LBH response:

33. The policy makes clear that it supports the delivery of a Green Innovation and Enterprise Hub within proximity of the Great West Corridor. The policy also supports the delivery of

other uses, such as a university. A planning application has been submitted within the GWC that includes a Green Innovation and Enterprise Hub.

- 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?**

Q15e) LBH response:

34. As per the Council's responses to Matter 5, the delivery of the strategic requirements identified in the Plan are not contingent upon transport improvements being fully delivered within the plan period. Whilst the transport improvements are important to ensure long-term investment in capacity and sustainability, and the Council are taking and will take a proactive approach to their implementation, the Plan's proposed growth and development is not contingent upon their full completion. Furthermore, the LTIA (EBEC2) illustrates how the growth in the Plan period will be delivered alongside a reduction in car journeys, meaning the road network will not be significantly impacted by the planned growth which can both be delivered independently, without reliance on the transport improvements being delivered.

- 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?**

Q15f) LBH response:

35. Yes, the approaches to public transport improvements as well as delivery of social infrastructure, where required, are justified and clear.

36. The public transport contributions are requested and calculated by TfL and are assessed using the Transport Assessment submitted during the planning application process. The contributions are based on the difference of the existing public transport

trip data and the forecast trip generation for the development, and the expected modal shift etc. TfL then applies their methodology to determine the appropriate contribution.

37. The Community Infrastructure Levy (CIL) is intended for broad, strategic infrastructure needs resulting from cumulative impacts of development across an area. It does however not address any site-specific impacts. The purpose of Section 106 is to mitigate any on-site or immediate off-site effects of individual developments. Where requirements are directly attributable to an impact of a development, a Section 106 is the principal mechanism for securing such infrastructure. The Council's adopted Planning Obligations and Community Infrastructure Levy SPD (2015) (**SPD3**²⁵) provides detailed guidance on how S106 planning obligations and CIL interact to support development in the borough.

g. Is the purpose of the Creative Enterprise Zone sufficiently reflected in the policy?

Q15g) LBH response:

38. Yes. The supporting text of the plan (in paragraph 2.45) outlines the purpose of the Great West Creatives CEZ, and the policy reflects this by outlining the Council's support for businesses in the media, broadcasting and digital sectors. Part C of the Policy P1 promotes the provision of affordable and flexible floorspace, supporting sectors, temporary proposals where appropriate and part DD of expects development proposals to assist with the growth of the creative, knowledge and research-based sectors, thus contributing to the purpose of promoting creative clusters.

h. Are the other specific requirements of development proposals, sufficiently clear to be evident how a decision maker should react to development proposals?

²⁵ SPD3- [Planning Obligations and CIL SPD \(2015\)](#)

Q15h) LBH response:

39. Yes. Parts Z to EE of Policy P1 are directed at employment or mixed-use proposals, including criteria for mixed-use schemes on employment land. These incorporate considerations, which are particularly relevant to the GWC, including the Agent of Change principle for industrial and residential co-location schemes, and the need to address issues of air and noise pollution, provision of adequate yard space and the need to support the creative, knowledge and research-based sectors. They are consistent with and link together with policies ED1 and ED2.
40. The sub-area policies outline a number of specific requirements for development proposals in each of the areas, covering topics such as the conservation of heritage assets, delivering new infrastructure such as parks, play and sports facilities, new rail links and upgrades to station infrastructure, active travel infrastructure, public realm improvements, enhancements to green and blue infrastructure, and any contextually appropriate design responses. The policy requirements are considered sufficiently clear for a decision maker, providing an unambiguous and locationally specific list of requirements on what development proposals within that sub-area are expected to deliver and as such can be weighed in the planning balance by the decision maker.

Q16) 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?

Q16) LBH response:

41. The methodology for determining the 6,500 homes figure to be delivered in the part of the Heathrow OA within Hounslow follows a similar approach to that taken in the London SHLAA 2017²⁶ and paragraph 4.1.11 of the London Plan 2021 (**ADP1**) in that it is informed by capacity. Significant growth is expected in the West of Borough within the

²⁶ London SHLAA 2017-

https://www.london.gov.uk/sites/default/files/2017_london_strategic_housing_land_availability_assessment.pdf

Heathrow OA. The growth is plan-led and has been informed by, but not limited to, capacity identified through the:

- Council's Call for Sites (2016 and 2017)
- Feltham Masterplan (2017) (**EX1.72**²⁷)
- Representations made as part of Regulation 18 consultations on the Local Plan where sites were submitted (including December 2023)

42. The evidence for the capacity identified in the OA is documented in the SACA 2024 (**EBSC2**). This includes site allocations and small sites (as defined in **ADP1**) that have been added to the Brownfield Land Register. The figure in the indicative target also takes account of the pipeline supply of permitted sites. The target contributes to the overall figures identified in the Housing Trajectory in Figure SC2.1 of the Plan.

43. This methodology is considered to provide a robust and ambitious but realistic approach to informing the contribution of housing capacity within Hounslow's part of the Heathrow OA, particularly given Hounslow and Hillingdon Councils are at significantly different stages of their plan making, with Hillingdon Council expected to undertake a further Regulation 18 consultation on their emerging Local Plan late in 2025, as set out in their Local Development Scheme (February 2025) (**ORD2**). The two Boroughs have cooperated on strategic matters as documented in the Statement of Common Ground (**EX5f**²⁸), however given the difference in plan making stages, it has been necessary for Hounslow to move forward with its plan making, taking a proactive and pragmatic approach to identifying capacities within its part of the Heathrow OA, consistent with the London Plan (**ADP1**).

Q17) 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?

²⁷ EX1.72- [Feltham Masterplan \(2017\)](#)

²⁸ EX5f- [Statement of Common Ground between LB Hounslow and LB Hillingdon \(October 2025\)](#)

Q17) LBH response:

44. The Council's Employment Land Review 2024 (**EBED1**) identifies that there is a requirement for significant additional industrial floorspace in this part of the borough (255,600 sqm), driven largely by demand from the warehousing/logistics sector associated with operations at Heathrow. There are very limited options available to meet this need on existing sites, as evidenced by the study, as well as by the Site Allocations and Capacity Assessment (SACA) (**EBSC2**), and the Council therefore considers that exceptional circumstances are demonstrated to justify release of Green Belt land to help alleviate this shortfall, as outlined in the Green Belt Background paper (**EBGB1**).
45. The London Plan (**ADP1**) provides an indicative jobs growth figure for the Heathrow Opportunity Area, which is referenced in the supporting text of the Local Plan (paragraph 2.57). This spans two boroughs with no apportionment specified for each. For Hounslow, the Council has not applied the jobs figure as a target in the policy, for the reasons outlined in the Council's response to Matter 4, Issue 1, Question 3. Instead, the Plan focuses on providing land to meet as much as possible of the identified requirements for industrial floorspace in this part of the borough.

Q18) 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?

Q18) LBH response:

46. The overall approach in the Heathrow OA is to provide additional homes and jobs to support the growth objectives of this designation. This growth is derived from requirements which do not assume expansion of the airport to three runways. The forthcoming Airports National Policy Statement, expected to be published in draft form during 2026, is likely to set out the government's approach of supporting the third runway project, and Heathrow Airport Limited has recently been announced as the preferred partner for this project. This project will be taken forward via the Nationally

Significant Infrastructure Projects (NSIPs) process. It is a long-term project, and it will be for future iterations of the Hounslow Local Plan as well as the London Plan to take account any land use implications of the project.

47. Policy EC3 of the Local Plan seeks to encourage a more sustainable Heathrow Airport by working with the operator to reduce environmental and traffic impacts. It reflects the Council's long-standing corporate position that Heathrow should be 'Better, not Bigger' - this position opposes a bigger Heathrow but supports a better and more successful airport as an asset that benefits Hounslow's residents and communities. Policy EC3 is important to enable the Council to achieve these objectives from any expansion proposals through the Development Consent Order process. Policy T8 of the London Plan sets out the Mayor's opposition to expansion of Heathrow unless certain criteria are met and reflects the position at the time of the London Plan's publication in 2021.

48. The Mayor, in his response to the Plan (REP074) and Statement of Common Ground, has not raised any general conformity issues in relation to Policy EC3 of the plan (**EX5e**).

Q19) 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?

Q19) LBH response:

49. Yes, this is reflected in the Statements of Common Ground with the Mayor of London (**EX5e**) and the London Borough of Hillingdon (**EX5f**). The Duty to Co-operate does not apply to Heathrow Airport Limited (HAL), but Hounslow Council has ongoing effective engagement with the airport and is a full participant in the Heathrow Strategic Planning Group, which includes HAL and other neighbouring authorities and stakeholders, and which is a forum for regular engagement on strategic planning matters.

Q20) 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?

Q20a) LBH response:

50. Yes. The Heathrow Opportunity Area boundary covers the west of the borough close to the airport, reflecting the location of industrial sectors, which are closely linked to operations at the airport and the areas which would be suitable for growth to support these sectors. It also includes Feltham Town Centre, where there are opportunities to deliver housing growth through site allocations. The OA also spans an area within neighbouring Hillingdon borough (Heathrow Airport is located within Hillingdon Borough but immediately adjacent to the Borough of Hounslow).

51. The Mayor, in his response to the Plan (REP074) and Statement of Common Ground. (EX5e), has not raised any general conformity issues in relation to the boundary of the Opportunity Areas.

b) Whether the other specific requirements of development proposals are sufficiently clear to be evident how a decision maker should react to development proposals?

Q20b) LBH response:

52. Yes. Parts K, L and M of Policy P2 provide clear development requirements, with K applying to residential developments and L and M applying to industrial developments in the Heathrow Opportunity Area. These policy requirements are considered sufficiently clear for a decision maker, providing an unambiguous set of requirements on what development proposals within that sub-area are expected to deliver, and as such can be weighed in the planning balance by the decision maker.

Q21) 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?

Q21) LBH response:

53. Policy P2(a) outlines a number of specific requirements of development proposals, covering topics such as heritage asset conservation, delivering new infrastructure such as play and sports facilities, upgrades to station infrastructure, active travel infrastructure, public realm improvements, enhancements to green and blue infrastructure and contextually appropriate design responses.

54. The policy requirements are considered sufficiently clear for a decision maker, providing an unambiguous and locationally specific list of requirements on what development proposals within that sub-area are expected to deliver, and as such can be weighed in the planning balance by the decision maker. Policy P2(a) demonstrates conformity with the London Plan (**ADP1**), specifically London Plan policies D8, D3, S4, HC1, G5 and SI17. The Mayor, in his response to the Plan (**REP074**) and Statement of Common Ground (**EX5e**), has not raised any general conformity issues with the London Plan (**ADP1**). Policy P2(a) also demonstrates conformity with paragraph 9 of the NPPF (**ORD3**).

Q22) 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?

Q22) LBH response:

55. Policy P2(b) is informed by the Feltham Masterplan 2017 (**EX1.73**), which establishes a framework that guides spatial development up to 2032 and identifies where development and investment should be targeted.

56. The policy outlines a number of specific requirements of development proposals, covering topics such as heritage asset conservation, delivering new infrastructure such as play and sports facilities, upgrades to station infrastructure, active travel infrastructure, public realm improvements and enhancements to green and blue infrastructure. The policy requirements are considered sufficiently clear for a decision maker, providing an unambiguous and locationally specific list of requirements on what development proposals within that sub-area are expected to deliver, and as such can be weighed in the planning balance by the decision maker. Policy P2(b) demonstrates conformity with the London Plan, specifically London Plan policies P8, D3, S4, HC1, T2, G1, G5 and SI17. The Mayor, in his response to the Plan (REP074) and Statement of Common Ground (**EX5e**), has not raised any general conformity issues with the London Plan (**ADP1**). Policy P2(a) also demonstrates conformity with paragraph 9 of the NPPF (**ORD3**).

Q23) 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?

Q23) LBH response:

57. The spatial approaches provide an overview of the unique settlements and places within the borough. The approaches set a clear approach to place making for each settlement and set out the priorities for the areas, with cross cutting themes covered throughout the other chapters in the Plan, that are relevant to the settlement.

58. Each of the spatial approaches sits within a strategic place focussed policy covering a wider strategic area based on the Opportunity Areas as identified in Policy SD1 of the London Plan (**ADP1**). The spatial approaches then provide an additional layer of detail that is locally specific to the settlements within the strategic areas. The approach is therefore considered effective and in general conformity with the London Plan.