

Hounslow Local Plan (2020-2041)
Examination Matters, Issues and Questions

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

London Borough of Hounslow Council Response

December 2025



**London Borough
of Hounslow**

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

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

Issue 1: Whether the Plan has been positively prepared and whether it is justified, effective, consistent with national policy and in general conformity with the London Plan in relation to the Borough's economy and employment (including proposed releases of Green Belt)?

Q1) What is the evidence in relation to jobs growth and the need for employment land/floorspace in the Borough over the Plan period? Is the employment land evidence base sufficiently up to date taking account of market signals?

Q1) LBH Response:

1. The Hounslow Local Plan 2020-41 is supported by the Hounslow Employment Land Review Update (ELR) (**EBED1**¹), which was published in 2024. Further updates to this document were provided in the Employment Background Note (**EX9**²) in October 2025. The 2024 Study was informed by extensive engagement with the markets operating in Hounslow, including the logistics market related to activities at Heathrow Airport, and the creative industries, which are a key sector in the east of the borough. It is up-to-date and takes account of the specific market signals in Hounslow.
2. The methodology for the calculation of employment land requirements takes account of projected jobs growth (from Experian's June 2023 forecasts) in office and industrial sectors (with typical jobs density of each sector generating a floorspace need estimate). This is then supplemented by an estimate of vacancy levels, and then with latest pipeline and completions monitoring data factored in (albeit office losses are not added to the requirement figure, to reflect the current weakness of the office market, as explained in ELR paragraph 4.20).

¹ EBED1 [Hounslow Employment Land Review update \(2024\)](#)

² EX9 [Employment Background Explanatory Note \(October 2025\)](#)

3. The ELR projects jobs growth in office/workshop sectors of 12,872 during the period 2020-41 (613 per annum)³, and of 3,961 during the period 2020-41 (189 per annum)⁴ in industrial sectors, covering core industrial and warehousing. This, when combined with the other factors referred to above, results in a requirement of 255,600 sqm of net additional industrial floorspace in the West of the Borough area during the period 2020-41; 208,200 sqm of net additional industrial floorspace in the remainder of the borough during the period 2020-41, and 204,621 sqm of net additional floorspace for offices borough-wide during the period 2020-41⁵. It should be noted that the consultants, Rapleys, have confirmed that the period specified in Table 4.4 on p52 of the ELR 2024 (EBED1) is an error, and that all figures are for the period 2020-41. The Council notes that a correction would therefore also be needed to paragraph 4.9 of the submitted Plan, to change the reference from 2019-43, to 2020-41.

Q2) Is the overall amount of employment land identified as to be provided in the Plan for industrial floorspace and office floorspace, justified? Why does the Plan not include a specific overall employment requirement in a strategic policy for industrial and/or office floorspace or a jobs target?

Q2) LBH Response:

4. The overall amount of employment land identified to be provided is set out in Part D of Policy ED1, which is a strategic policy and is justified by robust evidence. The Plan makes provision for 138,600 sqm of net additional industrial floorspace in the West of the Borough; 86,300 sqm of net additional industrial floorspace in the remaining areas of the borough; and 61,200 sqm of net additional office floorspace in the borough. The use of the three separate figures is necessary given the distinct nature of the different requirements, as outlined in the answer to Q1.
5. The figures show the borough's capacity to provide land to meet the requirements outlined above. They are based on the Council's site assessment work which identified land that satisfies the suitability, availability and achievability tests as set out in the Site Allocations and Capacity Assessment (SACA, EBSC2⁶). This includes the release of

³ Table 4.4 on p52 of the ELR [EBED1]

⁴ Table 5.3 on p56 of the ELR [EBED1]

⁵ Please note: the Employment Background Note [EX9] updates these figures to incorporate the latest monitoring data for 2022-23 and 2023-24.

⁶ EBSC2 [Hounslow Site Allocations and Capacity Assessment \(SACA\) \(2024\)](#)

Green Belt sites to provide land for industrial development in the West of the Borough, where exceptional circumstances are demonstrated.

6. The Council considers that, rather than using a jobs target, it is most effective for the Plan to focus on delivering floorspace that will contribute towards meeting the various specific requirements, which have been identified.

Q3) How does the overall amount of employment land identified to be provided in the Plan for industrial floorspace and office floorspace, relate to the jobs growth intended in the Heathrow OA and the Great West Corridor OA respectively in the London Plan 2021?

Q3) LBH Response:

7. Overall, the Plan allocates 92,957sqm of industrial floorspace and 47,000sqm of office space in the Great West Corridor; and 138,274 sqm of industrial floorspace and 3,603 sqm of office space in the West of the Borough (in the Heathrow Opportunity Area) (all figures are net additional development).
8. The jobs growth in Table 2.1 of the London Plan (**ADP1**⁷) presents indicative capacity figures for jobs, with an indicative capacity of 14,000 jobs in the Great West Corridor up to 2041 and 11,000 jobs in the Heathrow Opportunity Area (a cross-boundary opportunity area shared with LB Hillingdon) up to 2041. The supporting text to the policy (paragraph 2.1.1) states that boroughs should use the figures as a starting point when developing policies for development plans, to be tested through the assessment process.
9. These figures are clearly referred to in supporting text in Policies P1 and P2 respectively of the Plan (i.e. paragraphs 2.44 and 2.57). As intended by the London Plan, the Council has assessed the capacity of the Opportunity Areas to deliver employment growth, through the SACA process (**EBSC2**). This has resulted in the sites being brought forward in these areas as allocations. Together, as the floorspace figures above demonstrate,

⁷ ADP1 [London Plan \(2021\)](#)

these will deliver a significant amount of the employment requirements identified in the ELR (**EBED1**) and contribute to jobs growth in the Opportunity Areas.

Q4) Is the Plan sufficiently clear as to the amounts and location of general industrial floorspace (and those otherwise falling within Classes B1(b), B1(c) and B8) that it intends to allocate or identify?

Q4) LBH Response:

10. Yes. The site allocations clearly indicate which sites are allocated for industrial use, and which uses will be supported in each case. The allocations provide minimum development quanta, which indicate what amount of industrial floorspace (and which use class(es)) the Council expects to see delivered⁸.
11. In some cases, a flexible approach is taken with site allocations allowing for industrial use to be in either E(g)(iii), B2 or B8 use. In the process of agreeing positions between the Council and the Mayor (**EX5e**⁹ page 12 and 26), it was agreed that a modification could be proposed to clarify (in Policy ED1, Clause G) that conditions will be used to ensure that any permissions granted on allocated sites do not unintentionally allow movement to other use classes by way of current or future permitted development rights. This would apply in particular to Class E uses. Such a modification would be necessary for clarity and to ensure the Plan is effective.
12. In other cases, particularly on sites located in the West of the Borough, it is considered appropriate to allocate sites for B2 and B8 use only. This is to reflect the particular element of the requirement in this area, in proximity to Heathrow Airport, focused on warehousing and logistics.
13. The Plan also lists the various industrial locations in the borough, including existing Strategic Industrial Location (SIL) and Locally Significant Industrial Site (LSIS) designations (page 92-93 of the Local Plan **S1**¹⁰), and industrial estates which are being added as new LSIS designations (in Part A of Policy ED2). These are all clearly mapped

⁸ Appendices 6 and 7 of the ELR [EBED1] outline the site allocations for industrial and office use, which (if any) Opportunity Areas they are located in, and the amount of net floorspace they will deliver.

⁹ EX5e [Statement of Common Ground between LB Hounslow and the Mayor of London \(October 2025\)](#)

¹⁰ S1 [Hounslow Local Plan 2020-2041 Proposed Submission Version](#)

on the Local Plan Policies Map (**S2**¹¹). There are also non-designated industrial locations which the Council will continue to seek to protect, in line with the approach outlined in Part H of Policy ED2.

Q5) The approach of directing new offices to the Borough's four town centres, key office locations and sites allocated in the Plan is noted. Is such an approach justified and consistent with national policy?

Q5) LBH Response:

14. Yes. The Plan allocates a significant amount of office floorspace in the Opportunity Areas, particularly in the Great West Corridor. This reflects the evidence in the Employment Land Review Update (ELR) (**EBED1**) on the demand in this area for offices/workshops, and in particular to support the objectives of the Creative Enterprise Zone designated in this area. These sites have been assessed through studies such as the GWC Masterplan (**EBCC4**¹²), and the SACA (**EBSC2**).
15. Other sites where office use is supported in principle include in the Key Existing Office Locations (KEOL), including two (Chiswick Park and Bedfont Lakes) which are referenced in London Plan Policy E1(D) (**ADP1**) as a focus for new developments; as well as the other KEOL, which is located in the Great West Corridor.
16. The Council would also support new offices in town centres (subject to compliance with other policies), an approach which is in accordance with paragraph 91 of the National Planning Policy Framework (in which the Glossary includes offices in the list of 'main town centre uses') (**ORD3**¹³).

Q6) Should Policy ED1 (or other policies of the Plan) make clear how office floorspace in Class E would be secured for the purposes intended?

Q6) LBH Response:

¹¹ S2 [Hounslow Local Plan 2020-2041 Proposed Submission Version: Policies Map](#)

¹² EBCC4 [LBH Great West Corridor Masterplan - Revision \(2020\)](#)

¹³ ORD3 [National Planning Policy Framework December 2023](#)

17. As mentioned in the response to Q4 above, in the process of agreeing positions between the Council and the Mayor (**EX5e**, page 12 and 26), it was agreed that a modification could be proposed to clarify (in Policy ED1, Clause G) that conditions will be used to ensure that any permissions granted on allocated sites do not unintentionally allow movement to other use classes by way of current or future permitted development rights. This would apply in particular to Class E uses. Such a modification would be necessary for clarity and to ensure the Plan is effective.

<p>Q7) Are the other requirements of development proposals for offices in Policy ED1, sufficiently clear to be evident how a decision maker should react?</p>
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Q7) LBH Response:

18. Yes, this is sufficiently clear. Parts E and F of the policy apply to proposals in town centres and mixed-use development proposals, which may include office uses, and seek to provide facilities for home working where appropriate and for incubator space for start-up businesses. Part G applies to all employment proposals on allocated sites, and sets the expectation that proposals comply with the minimum development quanta given in the application. Part H/I apply to office proposals where they meet the thresholds in parts IV and V of the policy.

19. The policy introduces flexibility for development proposals coming forward on sites allocated for offices in the first phase of the Plan period (in paragraph 4.10 of the Plan). Marketing evidence will be considered on a case-by-case basis for departing from the minimum development quanta for office use. This is to recognise the short-term challenges the office market has faced in the last few years since the Covid-19 pandemic. The Council offers this flexibility while still expecting applicants to deliver significant quanta of employment floorspace on the respective site in these instances. This is because the evidence base is continuing to show a significant requirement for employment floorspace of various typologies in the GWC and elsewhere in the borough. The Council considers the approach enables suitable schemes to progress, while also allowing for the possibility of a recovery in the office market over the Plan period (ELR, para 2.85) (**EBED1**). In assessing proposals, the Council would expect applicants to

provide evidence to show proposals are optimising the opportunities for employment development on the site.

Q8) How has the employment land evidence assessed the need for additional sites for logistics development? Is the evidence sufficiently up to date? Is the Plan positively prepared in regard to logistics and in particular, any requirements arising from the Heathrow OA in the London Plan 2021?

Q8) LBH Response:

20. Yes. Assessing the needs of the industrial market operating close to Heathrow Airport was one of the core components of the plan's evidence base in the Employment Land Review Update (ELR) (**EBED1**). This is set out in particular in Section 3 of the study, and in the analysis of demand in Section 5. As paragraph 5.31 states, there is a very distinct geographical split to the nature of the industrial demand in the borough, including Heathrow-focused logistics/distribution in the West of the Borough.
21. The study highlights that this need is substantial – the 255,600 sqm currently identified as being required in the West of the Borough, in Table 5.5 the ELR and updated in the Employment Background Explanatory Note (**EX9**), includes the demand for logistics development which forms a significant proportion of the overall need for industrial development and closely relates to the demand for additional logistics development. Table 5.3 of the ELR identifies that the large majority of the occupier demand in the borough is for warehousing. As referred to in the answer to Q1, the ELR main report (**EBED1**) was published in 2024, based on Experian 2023 projections, and the Employment Background Explanatory Note (**EX9**) was published in October 2025, so these sources are up to date.
22. The Plan accordingly allocates 138,600 sqm of net additional industrial floorspace in the West of the Borough. This includes the release of Green Belt land for industrial development in this area.
23. The Council considers that this strategy accords with the opportunity area status, and that it enables growth in floorspace and jobs numbers to follow, and that it is positively

prepared in regard to logistics and the growth objectives of the Heathrow OA in the London Plan. With regard to requirements arising for the Heathrow OA in the London Plan, the Council refers to the answers to Q3 of Matter 4 Issue 1.

24. The evidence is up-to-date and the Plan is positively prepared and consistent with NPPF paragraph 87 (**ORD3**) and Planning Practice Guidance on housing and economic needs (para 031) (**EX1.02**¹⁴).

Q9) Have any alternative options for the distribution of new employment development been considered? If so, what were they?

Q9) LBH Response:

25. Yes. The Integrated Impact Assessment (IIA) (**S3**¹⁵) assessed five options for employment growth, of which Option E3 (optimising the delivery of new employment land including through the release of Green Belt land) has been selected as the preferred approach.
26. This reflects the focus on delivering industrial development for the logistics, storage and warehousing sectors in the West of the Borough and for a range of operators in the rest of the borough, most notably the Great West Corridor. These include last-mile distribution, manufacturing and office/flexible workspaces/light industrial workshop uses associated with the creatives industries, i.e. a mixture of offices and industrial uses.
27. This distribution responds to the OA status in the London Plan for these locations, and also to the evidence base and the locations which are generating different forms of demand (see the Employment Land Review Update (ELR) (**EBED1**) and LBH Sectors Research (**EBED5**¹⁶).
28. Other reasonable alternatives explored included Option E4, which would utilise some of the brownfield sites in urban areas allocated for housing/mixed use solely for employment use instead. The conclusions of the IIA (**S3**) noted that this would impede

¹⁴ EX1.02 [National Planning Practice Guidance](#)

¹⁵ S3 [Hounslow Local Plan Review Integrated Impact Assessment Report](#)

¹⁶ EBED5 [LBH Sector Research \(2015\)](#)

the Council's ability to meet its London Plan derived housing target and its housing needs. It would also not meet the locationally specific logistics development needs in the West of the Borough. This reasonable alternative was therefore not considered a sustainable option. Section 5.3 of the IIA provides an outline of the options and how they were appraised and chapter 6 for an overview of how the Council selected the preferred approach (sections 6.1.5-6.1.7 for the employment options).

29. The Duty to Co-operate process has explored whether any neighbouring boroughs within the Functional Economic Market Area (FEMA) would have capacity to assist the borough in meeting employment requirements. However, all boroughs have stated that they have no capacity to help meet this requirement. The Council has produced Statements of Common Ground with its neighbouring authorities that confirms this engagement.

Q10) Is the identification and boundaries of the Strategic Industrial Sites (SIL), Locally Significant Industrial Sites (LSIS), other existing industrial sites, Key Existing Office Locations (KEOL), Great West Corridor Creative Enterprise Zone and Strategic Outer London Development Centre - justified, consistent with national policy and in general conformity with the London Plan 2021?

Q10) LBH Response:

30. Yes. The Strategic Industrial Locations are a continuation of the existing boundaries, with the exception of:

- Removal of part of the Great West Road SIL to allow for co-location proposals to come forward, as identified in the masterplanning process for the area (see pages 93-94, 159 and 178 of the Great West Corridor Masterplan (**EBCC4**)).
- The addition of an area south of Great West Road to partially compensate for this loss. Sites within this area are allocated in the Plan for industrial use.

Overall, the area of the SIL would reduce by 8.3 hectares.

31. The Locally Significant Industrial Locations (LSISs) are a continuation of the existing Local Plan (**ADP2**) boundaries, with the addition of a series of new LSISs for previously non-designated sites which the Council now considers reflect the size, nature and role of LSISs. This approach was recommended in the 2016 Employment Land Review (para

5.100), which audited these sites and recommended them for designation. The Employment Land Review Update (ELR) (**EBED1**), at paragraph 3.86, reaffirms this recommendation. The Policies Map (**S2**) sets the precise boundaries for these new designations, which reflect the extent of the industrial estate functions at these sites. The Council has not received any objections to these new designations from the site owners.

32. The Key Existing Office Locations are a continuation of the designations in the existing Local Plan (**ADP2**), as recommended in the ELR at paragraph 6.74 (**EBED1**). This reflects the substantial need for employment land and the lack of options for meeting these needs, underlining the necessity of retaining and protecting existing employment land. The ELR also highlights that the borough's secondary stock continues to play an important role, operates differently to new build space, and cannot be replaced.
33. The Creative Enterprise Zone (CEZ) is not a planning policy designation but has been designated by the London Mayor. It seeks to promote creative clusters and workspace, provide employment and training for local people, and strengthen the already thriving creative economy in Hounslow. It covers a slightly wider area than the Great West Corridor Opportunity Area as it encompasses Chiswick House, Chiswick Business Park and parks in the area, as well as Brentford Town Centre.
34. The previous version of the London Plan, published in 2016, identified the Great West Corridor (Hounslow) as a Strategic Outer London Development Centre (SOLDC), where there were one or more strategic economic functions of greater than sub-regional importance. The GWC was identified for the importance of the media industry, and the policy objective was to realise the potential of these centres. The latest version of the London Plan [**ADP1**] contains a policy for SOLDCs as part of Policy E8 (Sector growth opportunities and clusters), where boroughs are encouraged to promote the development of these centres, including by bringing forward development capacity. However, the policy does not identify specific locations or boundaries for this designation. The Council considers that the intentions of Policy E8 are embedded in plan's approach to the Opportunity Area and CEZ status of the GWC area, and therefore that the plan is in general conformity with the London Plan.

Q11) Are the approaches in Policies ED1 and ED2 in terms of development proposals in SIL, LSIS, KEOL and other industrial and office sites – justified, effective, consistent with national policy and in general conformity with the London Plan 2021?

Q11) LBH Response:

35. Yes, the policy approaches in ED1 and ED2 are in general conformity with the London Plan and are justified and effective. Policy ED1 directs new industrial/warehousing and related development to SILs, LSISs and other existing industrial sites, and to sites which have been newly allocated/designated in the plan.
36. Policy ED2 states that the Council will protect designated SILs and LSISs as well as designating new LSISs. Development proposals on these designations will be expected to provide an assessment demonstrating that they do not compromise the objectives of the designation and accord, where relevant with the objectives of the CEZ and SOLDC.
37. Within the designations, industrial uses are encouraged in policy ED2. Proposals are, as a minimum, expected to provide no net loss of floorspace and to protect existing businesses, and the Council will support intensification proposals where they comply with other policies in the plan. Applicants are required to provide a robust justification for any proposed net loss of industrial floorspace, with marketing requirements for such losses proposed outside SILs and LSISs set out in Clause H of the policy.
38. These requirements are justified in order to protect existing employment floorspace in the borough, in the context of the employment needs highlighted in the evidence base. The Council considers the policy approaches to designated employment areas are consistent with policies E1, E4, E5, E6 and E7 of the London Plan. This includes the approach to promoting industrial intensification, which the Council supports on all existing sites subject to compliance with other policies (as set out in Part D of Policy ED2).

Q12) Is Policy ED1, effective, justified, consistent with national policy and in general conformity with the London Plan 2021 with respect to the requirements for affordable workspace and the list of development types and locations from which it will be sought? Responses should specifically address:

- **Whether there is sufficient evidence of the amount of affordable workspace that would be provided and whether it is viable in the locations identified?**
- **Is the approach to payments in lieu for offsite affordable workspace and how it would be calculated justified and effective?**
- **How eligibility and nominations for affordable workspace would be considered and secured?**
- **How existing affordable workspace would be retained in the Borough and whether the approach to re-provision is justified and effective?**
- **Whether the intention to defer some of the detail of the approach to a Supplementary Planning Document, including how contributions will be used, is justified and consistent with national policy?**

Q12a) LBH Response:

- a) **Whether there is sufficient evidence of the amount of affordable workspace that would be provided and whether it is viable in the locations identified?**

39. Yes. Robust evidence to support the requirement for employment developments to provide affordable workspace is set out in the WLA Affordable Workspace Study (2021) and the Council's Employment Land Reviews (2016 and 2024). The former Study outlines typologies of affordable workspace and rationales for intervention, such as to support Council corporate objectives for sector support and deliver regeneration objectives. The latter Studies outline how businesses operating in the creatives sector frequently find it challenging to find affordable units, while the market is not providing these at an affordable market rent.

40. Appendix 1 of the 2024 Employment Land Review Update (ELR) (**EBED1**) highlights how redevelopment, particularly in the GWC but also across the borough, is likely to stress the secondary market and displacement of firms from such sites.

41. The ELR (**EBED1**) recommends that an affordable workspace requirement applying a rental discount of 45 per cent on 10 per cent of the floorspace of employment schemes

would be viable across the borough. This scenario has been subject to an issue-specific viability assessment, as set out in Appendix 1 of the ELR (**EBED1**). It has been found to be viable as part of the Whole Plan Viability Assessment 2024 (**EBV1**¹⁷, pages 4 and 35-40], which found that cumulatively the Plan is viable. The proposed approach is in general conformity with Policy E3 of the London Plan.

Q12b) LBH Response:

b) Is the approach to payments in lieu for offsite affordable workspace and how it would be calculated justified and effective?

42. The policy steers applicants to provide affordable workspace on-site. It also provides options to deliver such floorspace off-site, following the recommendations in the ELR in Appendix 1 (**EBED1**). Furthermore, it provides for payments in lieu to be made, and the Council will provide an online calculator for applicants to use to clarify at the outset what contribution would be expected. This is being produced based on the Whole Plan Viability Assessment (**EBV1**) and developed on the basis of benchmarking the approach with other boroughs.

Q12c) LBH Response:

c) How eligibility and nominations for affordable workspace would be considered and secured?

43. Policy ED1 sets out that developers should collaborate with the Council and other stakeholders to identify the businesses that will be nominated for occupying affordable workspace. This will require working with other Council departments, and the Council will set out further information and advice on this matter in subsequent guidance.

Q12d) LBH Response:

d) How existing affordable workspace would be retained in the Borough and whether the approach to re-provision is justified and effective?

44. Yes, the approach is justified and effect, subject to a modification in Policy ED1 Part I, which states redevelopment of existing affordable and open workspace must re-provide the maximum viable quality of such economic floorspace. This is an error as the word

¹⁷ EBV1 [Hounslow Whole Plan Viability Assessment \(2024\)](#)

‘quality’ needs to be replaced with ‘quantity’. Retention of the maximum viable amount of such floorspace is justified by the extent of the need for employment floorspace, the need to retain existing floorspace and the extent of redevelopment envisaged in the Plan which is likely to involve some degree of displacement of existing businesses in lower-cost secondary stock.

Q12e) LBH Response:

- e) Whether the intention to defer some of the detail of the approach to a Supplementary Planning Document, including how contributions will be used, is justified and consistent with national policy?**

45. Yes. The Policy sets out the details on how it operates. The evidence underpinning the approach has been provided and the calculator for in lieu payments will be published on the Council’s website in early 2026. The Council will provide further guidance setting out the detail over the process for nominating occupants of the affordable floorspace, working in collaboration with other Council departments and other businesses, training providers and stakeholders across the borough.

Q13) Should the expectation that employment development coming forward on allocated sites comply with the minimum development quantum identified in the Plan also be linked to the design-led approach in London Plan Policy D3?

Q13) LBH Response:

46. The minimum development requirements in the site allocations have been developed through a design-led approach. This has sought to optimise the use of the site subject to other considerations. In the GWC, this has been conducted through the GWC Masterplan (**EBCC4**), and, in other areas, a density-by-design approach has been used. The Council considers that this approach is consistent with the NPPF and London Plan Policy D3 and that no further cross-referencing to London Plan Policy D3 is necessary for soundness.

Q14) Is the approach of Policy ED2 with respect to co-location of industrial premises with residential development within part of the existing SIL within the Great West Corridor (West Cross Campus) and its proposed removal from the SIL - justified and in general conformity with London Plan Policies E5 and E7?

Q14) LBH Response:

47. Yes, this area has been assessed through the GWC Masterplan (**EBCC4**) to be suitable for co-location of residential and employment. Suitably designed co-location could be achieved here and could be developed through typologies such as those outlined in pages 118-121 of the Masterplan. This would enable a significant increase of residential development in the area while ensuring industrial intensification helps to deliver jobs growth alongside this. This would in turn unlock regeneration of the area, including environmental enhancements, improvements to the public realm and a boost to public transport accessibility.
48. Any residential proposals would be required to comply with key design considerations, including the Agent of Change principle and to protect the integrity of existing industrial operations in the area. In assessing co-location proposals, policy ED1 references these principles and Policy E7 of the London Plan (**ADP1**). The remainder of the SIL area would be protected for industrial use and intensified in accordance with Policy E5 of the London Plan.
49. It has been necessary to remove the SIL designation covering part of the site to allow for residential development to be introduced, to ensure compliance with London Plan Policy E7. An area of replacement SIL would be designated on the opposite side of the Great West Road to partially compensate for this loss. The overall changes are referenced in the response to Question 10 above.
50. This reduction of the area of SIL at this location needs to be considered in conjunction with the associated allocations associated with the SIL, and the minimum development quanta (net) for industrial floorspace proposed. The allocations, including those for co-location would achieve net increases in industrial floorspace, of 24,099sqm at West Cross Campus and 15,913sqm at the Gillette Factory. Therefore, they would help the

borough to meet its industrial requirements over the Plan period, while also helping the borough to meet its housing targets.

Q15) Does the Plan appropriately account for circumstances where co-location of existing employment land may be suitable elsewhere? If not, why not?

Q15) LBH Response:

51. Yes. Part J of policy ED1 provides a framework for assessing proposals, including ensuring proposals are in compliance with key design principles as set out in Policy E7 of the 2021 London Plan (**ADP1**), including the agent of change principle, as mentioned in the answer to Q14.

52. Other sites have been assessed and, where suitable, have been identified for co-location of housing and industrial development. These include Phoenix Business Park and Gillette, as well as West Cross referred to above. Beyond this, little opportunity has been identified for the co-location of industrial and residential development, partly due to site-specific constraints and partly due to the need to optimise the retention of industrial land in the borough. In the West of the Borough, the type of industrial development likely to come forward – warehousing, distribution and logistics – is not generally suitable for co-location with residential development.

Q16) Are the requirements of Policy ED4 in terms of enhancing local skills, including the development proposals subject to the requirements, justified and effective?

Q16) LBH Response:

53. Yes. This policy is in general conformity with London Plan Policy E11 (**ADP1**). The supporting text of Policy ED4 sets out that one of the Council's objectives is to upskill the borough's workforce (set out in the Council's Prosperity and Place Strategy

(EX1.11¹⁸) and following evidence from the Council's Business Case for Growth 2024 (EBED3¹⁹). This policy is critical to allow the Council to achieve this including through development and has been implemented successfully in light of the requirements in the existing Local Plan (ADP2).

54. The requirement for all schemes of 10 or more homes or 0.5ha or more to secure local employment during construction and end phases is considered to be an appropriate threshold and has been benchmarked with other London boroughs.

55. The requirement for industrial proposals on former Green Belt sites to provide a strategy for skills enhancement and training opportunities for local residents is considered critical to ensure these developments deliver economic development in a way that is socially inclusive, and which helps upskill borough residents, thereby helping to deliver the Council's corporate objectives.

Q17) When having regard to the previous questions on employment and opportunity areas, is the approach to Green Belt and Metropolitan Open Land (MOL) release in the Policy SD1 (and elsewhere in the Plan) in general conformity with the London Plan 2021 and can the Council explain how it considers that exceptional circumstances have been demonstrated to justify Green Belt (and MOL) releases to meet both identified needs employment, with regard to each of the following considerations:

- (a) Would as much use as possible be made of suitable brownfield sites and underutilised land that are not currently within the Green Belt (and MOL)?**
- (b) Would the density of development of employment sites that are not currently within the Green Belt (and MOL) be optimised?**
- (c) Has plan-making activity been informed by discussions with neighbouring authorities in its Functional Economic Market Area and/or which fall within the Heathrow OA about whether they could accommodate some of the need for development, as demonstrated through Statements of Common Ground?**

Q17a, b) LBH Response:

¹⁸ EX1.11 [Hounslow: Prosperity and Place \(2022\)](#)

¹⁹ EBED3 [Opportunity Hounslow: Business Case for Growth \(2024\)](#)

- a) **Would as much use as possible be made of suitable brownfield sites and underutilised land that are not currently within the Green Belt (and MOL)?**
- b) **Would the density of development of employment sites that are not currently within the Green Belt (and MOL) be optimised?**

62. The Plan does not propose to release any Metropolitan Open Land (MOL), and the sites proposed to be released from Green Belt for industrial development are listed in Policy ED1.

63. The Council has set out (in the Green Belt Background Paper (**EBGB1**²⁰) the exceptional circumstances which justify Green Belt releases in the borough. The Council considers that this approach is in general conformity with the London Plan (**ADP1**), as well as in compliance with NPPF (2023) paragraph 146 (**ORD3**).

64. In relation to employment, the Background Paper finds that exceptional circumstances have been demonstrated in the form of significant quantitative and qualitative shortfalls in the ability of non-Green Belt sites to meet the identified requirement for additional industrial floorspace, for the logistics and distribution industries which require land in the vicinity of Heathrow Airport and the strategic road network.

65. Regarding industrial development, the Background Paper (**EBGB1**) (in paragraphs 4.22-4.27) outlines how the Council has explored the scope for new industrial development on suitable brownfield sites and underutilised land, in the West of the Borough, including through the Site Allocations and Capacity Assessment (SACA) (**EBSC2**) and the Employment Land Review Update (ELR) (**EBED1**). This has resulted in a limited supply of such sites, which are being brought forward as allocations, but despite these sites being included, a significant shortfall remains. The Council also acknowledges the findings in the ELR (in paragraphs 6.14-6.22) that formats such as multi-stacking are currently challenging for developers in terms of cost and risk, and that this therefore does not represent a short-term solution to meeting needs.

66. In summary, the Background Paper sets out how the plan-making process has uncovered an insufficient supply of brownfield land in the borough to enable it to help

²⁰ EBGB1 [Green Belt Background Paper \(Incorporating Exceptional Circumstances Assessment\) \(June 2025\)](#)

reduce the significant shortfall of industrial land to serve the logistics sector in the West of the Borough – a need which cannot be met in any other part of the borough due to its typological and geographical specificity. The Council therefore considers that exceptional circumstances have been demonstrated to justify Green Belt releases to help meet these identified development requirements. Accordingly, the SACA has explored the scope for overcoming constraints on certain sites to help reduce the shortfall, and this included scrutinising the option release of Green Belt land for industrial development.

Q17c) LBH Response:

- c) Has plan-making activity been informed by discussions with neighbouring authorities in its Functional Economic Market Area and/or which fall within the Heathrow OA about whether they could accommodate some of the need for development, as demonstrated through Statements of Common Ground?**

67. Yes. The process of preparing the Plan has been informed by discussions with neighbouring authorities about whether they could accommodate some of the need for employment development. This is demonstrated through Statements of Common Ground (**S10b**²¹; **EX5c**²²; **EX5d**²³; **EX5f**²⁴; **EX5g**²⁵). All the neighbouring authorities have replied that they have no spare capacity to meet any of the Council's unmet requirements for employment.

Q18) In the context of the above, is a 'comprehensive review' of Green Belt (and MOL) boundaries limited to only Hounslow Borough an appropriate and justified manner to identify any land required to address unmet needs for logistics, distribution and other activities associated with Heathrow Airport?

Q18) LBH Response:

²¹ S10b [LB Ealing & LB Hounslow Statement of Common Ground \(2025\)](#)

²² EX5c [Statement of Common Ground between LB Hounslow and LB Richmond upon Thames \(September 2025\)](#)

²³ EX5d [Statement of Common Ground between LB Hounslow and LB Hammersmith and Fulham \(September 2025\)](#)

²⁴ EX5f [Statement of Common Ground between LB Hounslow and LB Hillingdon \(October 2025\)](#)

²⁵ EX5g [Statement of Common Ground between LB Hounslow and Spelthorne BC \(October 2025\)](#)

68. Yes (albeit please note that the plan is not proposing to alter MOL boundaries). The review is a comprehensive assessment of all the Green Belt land within Hounslow borough.
69. The evidence identifies that the need derived from the logistics and distribution sector is the main component of the projected industrial land requirement in the borough. In this context, it is considered that carrying out a comprehensive review of Green Belt boundaries in Hounslow borough is an appropriate and justified way to identify land required to address unmet needs for these sectors, and is supported in national policy²⁶ and guidance²⁷.
70. The other borough within the Heathrow Opportunity Area is the London Borough of Hillingdon. Hounslow and Hillingdon Councils are at significantly different stages of their plan making, with Hillingdon 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).
71. The two boroughs have cooperated on strategic matters as documented in the Statement of Common Ground (**EX5f**). However, given the difference in plan making stages, it has been necessary for Hounslow to move forward with its Plan making, with a Green Belt review part of this process.

²⁶ See para 87 of the NPPF

²⁷ See Housing and Economic Needs Assessment section of PPG [EX1.02], paras 031-032

Q19) The Council's Green Belt Background Paper - incorporating Exceptional Circumstances Assessment June 2025 (EBGB1) indicates that the proposed releases of Green Belt (and MOL) in the Plan would only help to close the gap between the demand and supply of industrial land in both quantitative and qualitative terms. However, a considerable shortfall of both industrial and office floorspace over the Plan period would seemingly remain. In that context, to what extent does the evidence justify the proposed alterations to the Green Belt (and MOL) boundaries in the Plan (and those areas otherwise not proposed to be released) by:

- (a) suitably identify the locations and appropriate scale of areas to be assessed?**
- (b) evaluating the contribution each assessment area makes to Green Belt purposes?**
- (c) Considering whether applying the policies relating to areas or assets of particular importance in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development of the assessment area?**
- (d) identifying if the release or development of the areas assessed would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the Plan area?**
- (e) taking account of the intended permanence of Green Belt boundaries in the long term so they can endure beyond the Plan period?**

Q19a) LBH Response:

a) suitably identify the locations and appropriate scale of areas to be assessed?

72. Yes. The evidence base identifies a series of sites proposed to be released from the Green Belt, to help alleviate the significant shortfall of industrial land in the borough. These have been identified through a Green Belt Assessment (**EBGB5**²⁸), in which parcels have been assessed for their performance against Green Belt purposes, with a separate stage then assessing the performance of sub-areas where there was scope for subdivision (**EBGB4**²⁹). This Study was undertaken by Arup, who has considerable experience in the preparation of Green Belt studies, which their approaches and methodology found robust and sound at numerous local plan examinations.

73. An Exceptional Circumstances Assessment (incorporated within the Green Belt Background Paper) (**EBGB1**) has then assessed the suitability of development on

²⁸ EBGB5 [LBH Green Belt Review Stage 1 \(2015\)](#)

²⁹ EBGB4 [LBH Green Belt Review Stage 2 \(2019\)](#)

parcels, impacts on the Green Belt of releasing the land and made a judgment as to whether the benefits of releasing land would amount to exceptional circumstances for releasing land from the Green Belt.

74. This process has resulted in the proposed releases of land, which will provide a significant amount of additional floorspace to alleviate the shortfall of industrial land. The assessment concludes that there are no exceptional circumstances to justify any land in addition to those proposed for release, to provide for industrial land.

Q19b) LBH Response:

b) evaluating the contribution each assessment area makes to Green Belt purposes?

76. Yes. A core part of the Green Belt Assessment was an assessment of the performance of parcels against the five Green Belt purposes. This has been outlined in the Stage 1 and Stage 2 reports of the Green Belt Assessment.

Q19c) LBH Response:

c) considering whether applying the policies relating to areas or assets of particular importance in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development of the assessment area?

77. The Green Belt Assessment took into account key constraints impacting land parcels, including nature conservation designations and the Heathrow Public Safety Zone. The Exceptional Circumstances Assessment has appraised parcels of land against a range of suitability criteria, including planning history, accessibility, pollution, landscape impact, biodiversity impact, public access/open space function and heritage constraints. It also took into account availability and viability. All of these considerations have been factored into the overall judgment of whether exceptional circumstances are demonstrated at a site level to justify release of land from the Green Belt. No areas or assets of particular importance in footnote 7 of the NPPF would be impacted by the proposed releases of Green Belt land in the Plan.

78. Q19d) LBH Response:

- d) identifying if the release or development of the areas assessed would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the Plan area?**

78. The Green Belt Assessment incorporated a range of factors in the assessment of impact on the Green Belt. This included assessing parcels against the NPPF purposes, an appraisal of wider impact on the surrounding Green Belt in the event of release, and a consideration of boundaries.

79. As the Plan is assessed against the 2023 version of the NPPF (**ORD3**), the planning practice guidance implementing the 2024 NPPF (including on Grey Belt) does not apply to this Plan.

Q19e) LBH Response:

- e) taking account of the intended permanence of Green Belt boundaries in the long term so they can endure beyond the Plan period?**

80. Yes. In taking forward allocations on land removed from the Green Belt, the Plan proposes to introduce new strong, defensible boundaries for the revised Green Belt. This will ensure that the resulting Green Belt boundaries can endure beyond the Plan period.

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

Q20) The evidence in the Green Belt Background Paper - incorporating Exceptional Circumstances Assessment June 2025 (EBGB1) indicates that sites proposed to be released from the Green Belt would be expected to contribute towards compensatory improvements to remaining Green Belt land. Are the relevant policies of the Plan (Policies GB1, P2 and P2(c)) justified and effective in terms of the expectations of development proposals in those respects?

Q20) LBH Response:

81. Yes. Paragraph 147 of the 2023 NPPF (**ORD3**) states that in cases of Green Belt release, plans should “set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”.

82. This requirement is embedded in the Plan, with expectations clearly set out for applicants of what proposals are expected to achieve.

- Policy GB1 (J) sets out the requirement to reflect the above paragraph of the NPPF (**ORD3**). The policy also cross-references the various strategies and programmes which contain details of the improvement schemes, which can be carried out on the remaining Green Belt land in the borough, to improve their environmental quality and accessibility.
- Supporting text to policy P2 (para 2.61) also reflects paragraph 147 of the NPPF (**ORD3**) by stating that the Council will expect development proposals to deliver significant benefits for local and borough residents, including provision of enhanced access to green spaces, biodiversity enhancements and improved access to recreational facilities.
- Policy P2 (c) says proposals at Hatton Fields should contribute towards improvements to the environmental quality and accessibility of remaining Green Belt land and provide enhancements and extensions to habitats, including those within the Site of Importance for Nature Conservation (SINC) on the site, to achieve a minimum ten per cent biodiversity net gain across the wider site.

Q21) Without prejudice to our consideration of responses to Questions 17 to 19, is the proposed approach of designating land to be released from the Green Belt as LSIS justified and in general conformity with the London Plan 2021?

Q21) LBH Response:

83. Yes. Combined with the site allocations which stipulate minimum development quanta for the sites in question, this will ensure that industrial development of the type needed is delivered on these sites. In most cases, the site allocations stipulate that these should be in Use Classes B2 or B8.

Q22) Is the expectation in Policy GB1 that development proposals maintain the openness, setting and visual amenity where it is near the Green Belt and MOL – justified and consistent with national policy?

Q22) LBH Response:

84. Yes. Openness is one of the essential characteristics of Green Belt, and the requirement is therefore to protect this feature when considering proposals located near to the Green Belt boundary.

85. For Metropolitan Open Land, the policy requirement ensures that proposals do not undermine features which qualify the land as MOL, such as features or landscapes of national or metropolitan value; or land forming part of a strategic corridor, node or link to the network of green infrastructure.

Issue 2: Whether the Plan has been positively prepared and whether it is justified, effective, consistent with national policy and in general conformity with the London Plan in ensuring the vitality of the Borough's town and neighbourhood centres?

Q1) Has the Plan approach been informed by adequate and proportionate evidence in relation to Hounslow's town and neighbourhood centres? Responses should specifically address:

a) Whether the identification of the Borough's network of town and neighbourhood centres in Policy TC1 (and Table TC1.1) is justified?

b) Whether the evidence reflects the level of population being planned for in the Borough?

c) Whether the evidence is relevant, up-to-date and takes appropriate account of market signals, including having regard to the range of main town centre uses included in Class E of the Use Classes Order?

d) If not, what is the Plan seeking to achieve relative to the requirements for and distribution of main town centre uses?

Q1a) LBH Response

a. Whether the identification of the Borough's network of town and neighbourhood centres in Policy TC1 (and Table TC1.1) is justified?

86. The Retail Needs Study Update 2024 (**EBED2³⁰** and **EBED2a³¹**) assessed the centres against the definitions/defined role of centres set out Annex 1 of the London Plan 2021 (**ADP1³²**). It reviewed the role and type of provision provided in the centres of Hounslow and Chiswick, giving regard to the definitions/defined role of centres set out Annex 1 of the London Plan 2021 (**ADP1**), and considered that both continue to perform their respective roles as Metropolitan and Major Centres as set out in Policy TC1 of the Local Plan (**S1³³**). It also concluded that, given existing retail provision, shopping patterns, and the size of the centres of Feltham and Brentford, that both centres continue to perform

³⁰ EBED2 [Hounslow Retail Study Update 2024 - Volume 1 - Main Report](#)

³¹ EBED2a [Hounslow Retail Study Update 2024 - Volume 2 - Appendices](#)

³² ADP1 [London Plan \(2021\)](#)

³³ S1 [Hounslow Local Plan 2020-2041 Proposed Submission Version](#)

the role of district centres providing for the shopping and service needs of residents of the towns and their catchment areas. As such it is concluded that the hierarchy within Local Plan Policy TC1 is still relevant.

87. SD8 (c) of the London Plan 2021 (**ADP1**) states that Neighbourhood Centres ‘*may be designated in Local Plans*’ with the clause stating that “*Neighbourhood Centres can be changed where evidenced*”. Neighbourhood Centre designations in the Local Plan (**S1**) were audited in the Evidence Report to Support Consideration of Article 4 Directions 2022 (**EBED4**³⁴) with generally low vacancy rates found. The Retail Study Update 2024 (**EBED2**) also states, in Paragraph 4.24 that “*the centres to be generally functioning successfully and playing an important role in their communities.*”

88. As such, the identification of both the borough’s neighbourhood and town centre networks is justified and informed by adequate and proportionate evidence with no changes considered necessary.

Q1b) LBH Response:

b. Whether the evidence reflects the level of population being planned for in the Borough?

89. Yes. The analysis in the Retail Study Update 2024 (**EBED2**) is informed by population growth as well as expenditure trends and overall economic and leisure trends. The Study (**EBED2**) utilises population estimates produced by Experian, a widely used population and retail expenditure data provider. Experian provide population estimates using the:

- Census 2021 population estimates at Local Authority District level (England, Wales and Northern Ireland only).
- Office for National Statistics (ONS) 2023 mid-year estimates at Local Authority District level.
- ONS 2018-based subnational population projections (released March 2020).

³⁴EBED4 [LBH Evidence to Support Consideration of Article 4 Directions: Town and Neighbourhood Centres and Employment Designations \(2022\)](#)

90. This is an orthodox approach for retail/town centre evidence base studies with population projections broadly in line with the level of population planned for the borough.

Q1c) LBH Response:

c. Whether the evidence is relevant, up-to-date and takes appropriate account of market signals, including having regard to the range of main town centre uses included in Class E of the Use Classes Order? and (d) And If not, what is the Plan seeking to achieve relative to the requirements for and distribution of main town centre uses?

91. The Retail Needs Study Update 2024 (**EBED2**) is based on a standard and widely accepted methodology and assessment to inform local plan retail and town centre use policy. It post-dates and takes into account the introduction of Class E of the Use Classes Order and provides an update on market trends/economic trends and advises, based on its findings, appropriate wording to policies TC1-TC5 of the Local Plan. Meanwhile the Evidence Report to Support Consideration of Article 4 Directions 2022 (**EBED4**) reviews the Borough's retail areas, the High Streets specifically, and also audits the borough's town and neighbourhood centres. This also takes into account Use Class E.

92. The Town Centre policies themselves are aimed at safeguarding the viability and vitality of town centres, promoting them as places that provide a diverse retail, service, business, cultural and leisure offer in accordance with both the NPPF 2023 (**ORD3**) and London Plan 2021 (**ADP1**). The Plan is written in the context of merging two previous plans which were premised on growth in Opportunity Areas. This Local Plan (**S1**) seeks to consolidate growth in town centres in this context, with the evidence suggesting only moderate retail growth is needed and that the town centres alongside, in some instances, the Opportunity Areas, can accommodate some growth for main town centre uses. The Plan accordingly brings forward some allocations on town centre sites and still seeks to protect the viability and vitality of town centres by building upon previous regenerative allocations, particularly in Hounslow and Brentford.

Q2: Are there sufficient allocations/permissions to meet the identified needs set out in the Hounslow Retail Study Update 2024 (EBED2 and EBED2a)? If not, is the approach of the Plan justified and consistent with national policy insofar as it is required to look forward at least ten years ahead, or is there a net requirement still to be identified for each type of main town centre use?

Q2) LBH Response:

93. Throughout the Plan period, the Borough will be seeking to consolidate retail floorspace offering in town centres. It is considered that there are sufficient allocations/permissions to meet the identified needs. The forecasts in the Retail Needs Study Update 2024 (**EBED2**) demonstrate this at Paragraph 5.10, where it concludes that *"the site allocations being brought forward in the new Local Plan that include comparison goods floorspace, which are also important for the regeneration of the two town centres and intensification of development delivering mixed use, remain justified/evidenced. Elsewhere in the plan reviews, we note an element of retail provision is being taken forward on sites where it is for place-making purposes or replacing retail floorspace lost as part of redevelopment proposals. It is considered that the floorspace capacity assessment update in this report does not affect these proposals/allocations."*

94. Allocations from the previous plan at Brentford Waterside are in the process of being delivered, demonstrating that the previous plan has succeeded in its job of meeting the growth needs in this location. The Local Plan (**S1**) is supportive of consolidating Brentford's role as a Town Centre and ensuring that the viability and vitality of the town centre is protected.

Q3: Is the Plan sufficiently clear, including when taking Policies P1, P1(a), P1(b), P1(c), P2, P2(a), P2(b), P2(c) and Policies TC1, TC2, TC3, TC4 and TC5 together, as to the overall amount of each type of main town centre use and the locations being planned for during the Plan period? Would the approach of the relevant policies be effective for the purposes of decision making on future development proposals?

Q3) LBH Response:

95. Overall, there is modest need for retail floorspace in the borough over the plan period. Policies P1, P1(a), P1(b) and P1(c) support active frontages being located in the Opportunity Area in certain circumstances for place making purposes, but otherwise it will be expected that main town centre uses are located in town centres. Policy P2 directs mixed-use development towards sustainable locations, such as Feltham Town Centre. Policy TC3 is applicable in that it requires town-centre use proposals outside defined town centres to address the retail policy tests (sequential approach and retail impact).

Q4: Would Policy TC1 be effective, justified, consistent with national policy and in general conformity with the London Plan in all other respects, including with regard to where sustainable growth will be supported?

Q4) LBH Response:

96. Yes. The Town Centre hierarchy in TC1 is informed by the London Plan 2021 **(ADP1)** and in accordance with Paragraph 90(a) of the NPPF 2023 **(ORD3)**. As per SD6 and SD8 of the London Plan 2021 **(ADP1)**, the Local Plan **(S1)** also designates Neighbourhood Centres. Policies TC2-TC5 then go into detail in regard to what type of development may be acceptable in Town Centres, Neighbourhood Centres and elsewhere.

Q5: Would Policy TC2 be effective, justified, consistent with national policy and in general conformity with the London Plan in all other respects, including the objective of retaining existing levels of retail floorspace in Feltham Town Centre (noting the range of main town centre uses that fall within Use Class E) and in terms of how an assessment would be made in terms of a development proposals contribution to the vitality and viability of the Borough's town centres?

Q5) LBH Response:

97. Policy TC2 seeks to promote the vitality and viability of the four town centres within the borough and primary shopping areas which are defined in the Policies Map **(S2)**. Together, these are in accordance with paragraph 90 a-f of the NPPF 2023 **(ORD3)**. The Council will expect applicants to provide evidence that they have tried to optimise retail

use and provide active frontages. In terms of the objective of retaining existing levels of retail floorspace in Feltham Town Centre, Policy TC4 is applicable in that it sets out what proposals for non-retail proposals in Feltham's primary shopping area need to address and comply with.

Q6: Is the approach of Policy TC3 in seeking to manage the growth of retail and other main town centre uses; positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan?

Responses should address the following:

- a. Whether there is a suitable definition of large-scale retail development is appropriately defined in the Plan for the purpose of decision making?**
- b. Whether there is sufficient evidence to support the proposed locally set floorspace threshold of 500 sq.m of retail, above which an impact assessment would be required for development proposals?**
- c. If it is justified and consistent with national policy to have requirements linked to the Accessible London: Achieving an Inclusive Environment Supplementary Planning Guidance (SPG) document?**

Q6a) LBH Response:

- a. Whether there is a suitable definition of large-scale retail development is appropriately defined in the Plan for the purpose of decision making?**

98. The policy sets out the Council's strategy for large scale retail which may come forward and for when development outside of town centres may require an impact assessment through Clause C. Any retail proposals in the town centre would be supported in principle under the Plan's policies and the NPPF.

Q6b) LBH Response:

- b. Whether there is sufficient evidence to support the proposed locally set floorspace threshold of 500 sq.m of retail, above which an impact assessment would be required for development proposals?**

99. The 2018 Retail Needs Study reviewed the 500sqm threshold, having regard to town centre health; town centre performance; retail unit and floorspace composition and availability and retail trends, and it concluded that that the threshold of 500sqm was appropriate. The Retail Needs Study Update 2024 (**EBED2**) concluded that 'The

threshold will continue to provide the Council with sufficient flexibility to assess the merits and potential impact implications of edge and out-of-centre retail applications.”

and that amendments were not necessary. The 500sqm threshold is therefore considered evidenced and is also used in other London boroughs such as Brent.

Q6c) LBH Response:

c. If it is justified and consistent with national policy to have requirements linked to the Accessible London: Achieving an Inclusive Environment Supplementary Planning Guidance (SPG) document?

100. The Council considers that this Policy is justified and consistent with national policy and the SPG provides further guidance on the standards that the Council expects and also assists in giving developers guidance on how they can make developments more inclusive and more easily accessible.

Q7: Is Policy TC4 positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan, insofar as seeking to manage town centre uses? Responses should address:

- a. Whether there any changes proposed to the boundaries of town centres and primary shopping areas on the Policies Map and if so, is there any specific evidence to justify the boundaries drawn?**
- b. If it would be effective and sufficiently clear for the purposes of decision making when seeking to retain a high proportion of retail uses in primary shopping areas?**
- c. Are the types of uses where an over-concentration is avoided sufficiently clear and justified? If so, should they be listed in the policy?**
- d. Are the development proposals for which a Health Impact Assessment would be required - sufficiently clear and justified?**
- e. If it is justified and consistent with national policy to have requirements linked to Supplementary Planning Documents (SPDs) rather than development plan policies?**
- f. Whether the terminology is justified and consistent with national policy when referring to ‘business use’ or should it alternatively refer to ‘main town centre uses’?**

Q7a) LBH Response:

- a. Whether there any changes proposed to the boundaries of town centres and primary shopping areas on the Policies Map and if so, is there any specific evidence to justify the boundaries drawn?**

101. There are no changes to the town centre or primary shopping area boundaries, both of which can be seen in Policies Map (**S2**). The Council's evidence suggests that the borough's town centres are performing well with few vacancy rates, and it was therefore not considered necessary to commission a study to explore whether the boundaries needed amending.

Q7b) LBH Response

- b. If it would be effective and sufficiently clear for the purposes of decision making when seeking to retain a high proportion of retail uses in primary shopping areas?**

102. The Policy establishes town centre and primary shopping centre boundaries and protects the retail role within these areas. The policy is sufficiently clear in its reasoning in seeking to retain a high proportion of retail uses in the primary shopping areas. It is also effective in that it sets out what proposals for non-retail proposals need to address. These include such proposals in the PSA:

- to retain active frontages at ground floor level; and
- to submit a HIA for uses that can give risk to particular concern regarding the impact on health – such as betting shops and takeaways.

Q7c) LBH Response

- c. Are the types of uses where an over-concentration is avoided sufficiently clear and justified? If so, should they be listed in the policy?**

103. Examples of these types of uses are signposted in Policy TC4 at paragraph 3.12 of the supporting text and are in accordance with Policy E9 of the London Plan 2021 (**ADP1**). The supporting text should be read alongside the Policy and as such the Council does not consider that these uses should be listed within the Policy.

Q7d) LBH Response

- d. Are the development proposals for which a Health Impact Assessment would be required - sufficiently clear and justified?**

104. It is considered that these uses are clearly signposted to in 3.12 as to avoid proliferation and concentration of such uses. This is in accordance with GG3D of the London Plan 2021 (**ADP1**) and supporting text paragraph 6.9.5 of Policy E9. The supporting text should be read alongside the Policy and as such the Council does not consider that these uses should be listed within the Policy.

Q7e) LBH Response

- e. If it is justified and consistent with national policy to have requirements linked to Supplementary Planning Documents (SPDs) rather than development plan policies?**

105. Yes. National Policy supports the use of design guidance and codes, which to carry weight should be prepared as part of a plan or as a SPD (paras. 134, 139 and 139 a). SPDs referred to in this policy include the adopted Character, Sustainability and Design Codes SPD (SPD1) and the adopted Shop Front Design Guidelines SPD (EX1.1035).

106. The SPDs meet the requirements of Section 8 the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and therefore carry weight in decision making. The SPDs provide guidance to implement the policies and avoid the policies being overly lengthy.

107. The SPDs are referred to in the text of TC4 and are justified and consistent with national policy.

Q7f) LBH Response

- f. Whether the terminology is justified and consistent with national policy when referring to ‘business use’ or should it alternatively refer to ‘main town centre uses’?**

³⁵ EX1.10 - [Hounslow Shop Front Design Guidance SPD](#)

108. Yes, it should be 'main town centre uses'. The Council would be amenable to a modification to reflect this.

Q8: Is the approach of Policy TC5 in seeking to manage neighbourhood centres and isolated local shops; positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021?

Responses should address:

- a. Whether the 400m distance is justified in terms of a local shop being 'isolated', given Policy H1 of the London Plan implies that up to 800m could be a reasonable walking distance for the purpose of accessing sustainable means of travel?**
- b. Are the types of uses where an over-concentration is avoided sufficiently clear and justified? If so, should they be listed in the policy?**
- c. Are the development proposals for which a Health Impact Assessment would be required - sufficiently clear and justified?**

Q8a) LBH Response

- a. Whether the 400m distance is justified in terms of a local shop being 'isolated', given Policy H1 of the London Plan implies that up to 800m could be a reasonable walking distance for the purpose of accessing sustainable means of travel?**

109. Whereas 800m could be a reasonable walking distance for the purpose of accessible sustainable means of travel, the Council considers that local, isolated shops can play an extremely important role in providing everyday shopping need service for local people. As such it is considered that a 5-minute (400m) walking distance, is more appropriate than a 10 minute (800m) walking distance in this instance to help protect these shops and the service they provide. This measure is consistent with London-wide and national planning guidance, which often uses 400m as the "walkable catchment" for local services. Policy SD6 (Town centres and high streets) of the London Plan 2021 (ADP1) refers to walkable catchments and accessibility standards.

Q8b) LBH Response

- b. Are the types of uses where an over-concentration is avoided sufficiently clear and justified? If so, should they be listed in the policy?**

110. It is considered that these uses are clearly explained in paragraph 3.15 of the supporting text as to avoid proliferation and concentration of such uses and signposted

to in the Policy. This is in accordance with GG3D of the London Plan 2021 (ADP1) and supporting text paragraph 6.9.5 of Policy E9. The supporting text should be read alongside the Policy and as such the Council does not believe that these uses should be listed within the Policy.

Q8c) LBH Response

c. Are the development proposals for which a Health Impact Assessment would be required - sufficiently clear and justified?

111. It is considered that these uses are clearly explained in paragraph 3.15 of the supporting text as to avoid proliferation and concentration of such uses. This is in accordance with GG3D of the London Plan 2021 (ADP1) and supporting text paragraph 6.9.5 of Policy E9. The supporting text should be read alongside the Policy and as such the Council does not believe that these uses should be listed within the Policy.