

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

**Matter 5 – Transport, Communications and  
Connectivity**

**London Borough of Hounslow Council Response**

**December 2025**



**London Borough  
of Hounslow**

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

### Matter 5 – Transport, Communications and Connectivity

Issue 1 – Whether the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan in relation to transport, communications and connectivity?

#### Questions:

**Q1) The evidence to support the Plan, included transport modelling and associated updates in the Hounslow Local Transport Impact Assessment Update and Addendum (documents EBEC2 and EBEC2a). Did the methodologies used sufficiently account for the cumulative effects of the potential growth in the London Plan 2021 for Hounslow and the surrounding London Boroughs, including any implications of potential Heathrow Airport expansion (should any associated development commence and/or take place before 2041), together with housing and employment growth in neighbouring districts outside of London?**

#### Q1) LBH Response:

1. The transport modelling used to assess future development (**EBEC2<sup>1</sup> and EBEC2a<sup>2</sup>**) included the growth projections from the London Plan (2021) (**ADP1<sup>3</sup>**). As a result, it thoroughly considers the combined effects of expected growth in the London Plan for the borough of Hounslow, and nearby London boroughs. Although employment at the Airport Business Park is factored in, the potential impact of expanding Heathrow Airport was not included because a decision on Heathrow's third runway has not been yet made and as such no details are available to include in the transport modelling. The transport modelling does fully take into account growth in neighbouring districts outside London.

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<sup>1</sup> EBEC2 [Hounslow Local Transport Impact Assessment Update \(2024\)](#)

<sup>2</sup> EBEC2a [Hounslow Local Transport Impact Assessment Update - Addendum \(2025\)](#)

<sup>3</sup> ADP1 [London Plan \(2021\)](#)

**Q.2 Are the following planned transport improvements as identified in the Plan, including Policy EC1, to support housing and employment growth likely to be delivered in the plan period and if so, what is the source of the most up-to-date evidence in terms of funding arrangements and timescales for each?**

- a) West London Orbital - Brentford-Southall Rail Link to Elizabeth Line and HS2 Station**
- b) Piccadilly Line Service improvements**
- c) District Line Service improvements**
- d) Surface Level Access to Heathrow Airport via the South West Railway network**
- e) Gunnersbury Station improvements**
- f) Hounslow West Station improvements**
- g) Kew Bridge Station improvements**
- h) Golden Mile Station**
- i) Lionel Road Station**
- j) Improvements to bus services and introduction of express bus services**
- k) Cycling network improvements**
- l) Walking and cycling enhancements**

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

**Q2) LBH Response:**

2. Yes, the above listed planned transport improvements are likely to be delivered during the plan period. The Council has already signed a SoCG with TfL (**EX5a<sup>4</sup>**), within which it is stated that “*TfL will continue to work with LB Hounslow to identify the necessary interventions that would enable any strategic public transport based schemes to be delivered and operate effectively*”. The Council is in the process of drafting further SoCGs to ascertain an even more up to date position from stakeholders with an interest on the above mentioned projects in regards to funding and timescales. It is anticipated that these SoCGs will be signed and finalised prior to the hearing session on Matter 5.

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<sup>4</sup> EX5a [Statement of Common Ground between LB Hounslow and TfL \(August 2025\)](#)

**Q.3 Would the delivery of the strategic requirements identified in the Plan, be contingent upon the above transport improvements being fully delivered within the plan period? If not, which projects are considered to be the critical infrastructure upon which the delivery of the Plan will be dependant?**

**Q3) LBH Response:**

3. No, the delivery of the strategic requirements identified in the Plan are not contingent upon the above transport improvements being fully delivered within the plan period. Whilst the transport improvements are important to ensure long-term investment in capacity and sustainability, the Plan's proposed growth and development is not contingent upon their full completion. The strategic requirements of the Local Plan (**S1<sup>5</sup>**) along with the planned growth over the plan period, can both be delivered independently, without reliance on the transport improvements being delivered. Notwithstanding, the Council considers that the aforementioned transport improvements will still be delivered during the Plan period as funding sources and delivery mechanisms have been identified, and there is confidence that the improvements will be deliverable.

**Q.4 Would the Plan provide an effective approach to respond to circumstances if the delivery of one or more of the planned transport improvements were to be delayed or otherwise not taken forward during the Plan period?**

**Q4) LBH Response:**

4. With already signed SoCGs, there is a clear commitment from relevant stakeholders to deliver the planned transport improvements. In any case, as is outlined in the answer to Q3, the Plan's strategy for growth and development is not contingent on one or more of the transport improvements being delivered. Further SoCGs, in addition to those already signed, are being prepared to help demonstrate that there is a joint desire from stakeholders for these improvements to be delivered.

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<sup>5</sup> S1 [Hounslow Local Plan 2020-2041 Proposed Submission Version](#)

**Q.5 Does the Plan include any necessary safeguarding arrangements required to support the effective delivery of the planned transport improvements listed in Policy EC1?**

**Q5) LBH Response:**

5. Many of the projects listed in EC1 (such as service line or station improvements) do not require safeguarding of land for implementation. The following schemes do however have elements of safeguarding protection.
- West London Orbital – The Council refers to paragraph 4.3.4 of the Statement of Common Ground signed by TfL and LB Hounslow (**EX5a**<sup>6</sup>), where it is stated that *“LB Hounslow, other West London local planning authorities and Transport for London will continue to work together to develop the case for the West London Orbital and identify the steps necessary to implement the project. Both parties agree to propose a further modification to Policy EC1 C to include an additional clause referencing the need for policy protection to safeguard land that has, in collaboration with TfL, been identified to deliver the West London Orbital (see Appendix A).”*
  - Golden Mile Station – The Council refers to Allocation 5 – West Cross Campus (**S1a**<sup>7</sup>) within which provisions are made for the station to be delivered as part of any development.
  - The Council refers to the Site Requirements in Site Allocation 28 – 27 Great West Road (**S1a**) within which it is clear that the *“Development proposals must make provision for the new Lionel Road Station”*
  - The Council refers to Site Allocation 37 Gunnersbury Station (**S1a**) within which it is clear in the Movement and Access section that *“Provision of step-free level access to the platforms and improved station capacity should be provided or at minimum facilitated.”*
  - The Council refers to Site Allocation 74 Hounslow West (**S1a**) within which it is stated that *“Development should facilitate the provision of high quality pedestrian and cycle links within the Site and integrating with the surrounding areas specifically to Hounslow*

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<sup>6</sup> EX5a [Statement of Common Ground between LB Hounslow and TfL \(August 2025\)](#)

<sup>7</sup> S1a [Hounslow Local Plan 2020-2041 Proposed Submission Version: Chapter 12 - Site Allocations](#)

*West underground station via Beaversfield Park and to bus routes on Bath Road and Staines Road and the key local shopping parade of Hounslow West”*

In regard to Heathrow Southern Access, this route is yet to be formally finalised and therefore formal safeguarding cannot be done and reflected either within Policy or Site Allocations. Some land may be required for a new station and associated infrastructure, but this could be established at a later date through the planning application stage or, if necessary, a Transport Works Act Order once the route has been fully established.

**Q.6 Is the approach of Policy EC2 in seeking to support the development of a sustainable transport network; positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021? Responses should address:**

**a) Whether the requirements that development proposals are planned in accordance with the implementation of the Councils Parking and Kerbside Strategy, Controlled Parking Zones and restricting access to those zones to existing dwellings, are justified and whether the expectations are sufficiently clear to be effective?**

**Q6) LBH Response:**

6. Any parking associated with new development will have to comply with standards set out in London Plan Policy 6.13 **(ADP1<sup>8</sup>)**. The Local Plan **(S1<sup>9</sup>)** supports London Plan **(ADP1)** Policy 6.13 favouring car-free or car-lite developments in location of high public transport accessibility. The Parking **(EX1.66<sup>10</sup>)** and Kerbside **(EX1.67<sup>11</sup>)** Strategies both support the Hounslow Transport Strategy’s **(EBEC1<sup>12</sup>)** ambition of reducing car use, working towards the Mayor’s Transport Strategy of 70% mode share for sustainable travel and Transport for London (TfL)’s Healthy Streets model. The Kerbside Strategy **(EX1.67)** is an adopted Strategy which aims to protect kerbside parking in certain existing residential areas, reduce vehicular traffic and promote sustainable travel by reallocating kerbside space to other uses, such as Car Clubs and micro-mobility, and to

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<sup>8</sup> ADP1 [London Plan \(2021\)](#)

<sup>9</sup> S1a [Hounslow Local Plan 2020-2041 Proposed Submission Version: Chapter 12 - Site Allocations](#)

<sup>10</sup> EX1.66 [Hounslow Parking Strategy \(2024\)](#)

<sup>11</sup> EX1.67 [Hounslow Kerbside Strategy \(2024\)](#)

<sup>12</sup> EBEC1 [Hounslow Transport Strategy \(2025\)](#)

protect key public transport corridors and facilitate access to them. The Parking Strategy **(EX1.66)** outlines that disabled parking is an essential priority. Controlled Parking Zones (CPZs) help reduce parking pressure and discourage unnecessary car journeys, which helps to contribute to the above aims in the Parking Strategy.

**Q6)a) LBH Response:**

7. It is considered that including the stipulations of the Parking and Kerbside Strategies directly within EC2 would result in an overly detailed Policy.

**b) Is the expectation of development proposals for vehicle crossovers and off-street parking spaces to be consistent with local policies that do not form part of the development plan justified or should the expectations be included in the Plan for effectiveness?**

**Q6)b) LBH Response:**

8. It is considered that the Council's Crossover Policy sufficiently details the requirements and stipulations regarding crossovers. Including these requirements within EC2 would result in a policy too detailed.

**c) To be sufficiently clear for decision making, should the expectations in terms of the Healthy Streets Approach cross refer to the definition in the London Plan?**

**Q6)c) LBH Response:**

9. Whilst the Council considers that EC2 provides a good approach to decision making, if the Inspectors were minded to improve clarity, the Council would be amenable to additional text as follows: *'Applying a Healthy Streets approach that can be measured against the Healthy Streets Indicators set out in London Plan Policy T2 (or subsequent Policy)'*.

**d) Is the requirement that development proposals contribute towards on street visitor cycle parking, justified and if so, is it sufficiently clear how contributions from development proposals would be calculated?**

**Q6)d) LBH Response:**

10. Yes, seeking contributions towards on street visitor cycle parking is justified in accordance with Policy T5 of the London Plan (**ADP1**<sup>13</sup>) and can be delivered via either a 278 and/or a S106 contribution or Grampian Conditions (less common). Contributions would be calculated via an assessment of cycle trips taken from the Transport Assessment. The rates for visitor cycle parking (Sheffield stands) are known. If the Inspectors were minded to improve clarity, the Council would be amenable to adding the following to EC2 clause J: *'in accordance with Policy T5 of the London Plan'*.

**e) Are the expectations in terms of highway safety are consistent with national policy?**

**Q6)e) LBH Response:**

11. The Council considers that the Plan is consistent with national policy in regard to highway safety. Central to the aim of the Healthy Streets approach is to create streets that are pleasant, safe and attractive through, inter alia, improving highway safety. As such, by adopting a Healthy Streets approach, the Hounslow Local Plan (**S1**), and in particular EC2 also implements this approach to highway safety. As well as adopting the Healthy Streets approach, Clause EC2 seeks to give priority to pedestrians and cyclists through Clauses F & G; seeks to create places that are safe, secure and attractive through Clause O; seeks to allow for greater efficiency of deliveries through Clause Q and seeks to allow for EVC Points through Clause D.

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<sup>13</sup> ADP1 [London Plan \(2021\)](#)



**f) Whether it is justified and sufficiently clear in terms of when development proposals will expect to be accompanied by Travel Plans, Healthy Streets Checks and Assessments and Active Travel Zone Assessments?**

**Q6)f) LBH Response:**

12. Yes, it is considered clear when development proposals will be expected to include the preparation of Travel Plans, Healthy Streets Checks and Assessment, and Active Travel Zone Assessment. The requirements are set out in the latest TfL guidance on Transport Assessments found here: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessments>.

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

**Q6)g) LBH Response:**

13. It is considered that the expectations for when CLOCS (Construction Logistics and Community Safety) and Delivery and Servicing Plans are required are clear. Further guidance can be found from TFL here <https://content.tfl.gov.uk/delivery-and-servicing-plan-guidance.pdf>.

**Q.7 Is the approach of Policy EC4 which sets out the expectations of development proposals for telecommunications; positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021?**

**Q7) LBH Response:**

14. Yes, the approach is in accordance with Paragraph 118-122 of the NPPF as well as the London Plan by supporting improvements to infrastructure and in seeking to ensure that development does not interfere with broadcast or telecommunication infrastructure.