

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

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

12th December 2025



**London Borough
of Hounslow**

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

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

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 green and blue infrastructure, community infrastructure and environmental quality?

Questions:

- 1) Policies GB2, GB3, GB8 and GB9 relate to open space; open space in educational use; allotments, agriculture and local food growing; and playspace, outdoor sports facilities and burial space respectively, are they positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021? Responses should address:
- a) Are the policies, opportunities for new provision and open space standards used to determine deficiencies of provision in publicly accessible open space - effective and based on robust and up-to-date evidence of need, and does the evidence take sufficient account of the expectations of Policy G4 of the London Plan?

Q1) (a) LBH Response:

1. Yes, policies GB2, GB3, GB8 and GB9 are sound. The opportunities for new provision and the open space standards that are used to determine deficiencies of provision in publicly accessible open space are based on the evidence base findings. The Open Space Study 2018 (Document **EBGB7**¹) provides a detailed assessment of open space provision within Hounslow, its condition, distribution and quality. In particular it utilises audit data to set local provision standards to help identify potential surpluses/deficiencies and priorities for open spaces to be considered in the Plan.
2. The Hounslow Green and Blue Infrastructure Strategy 2021 (Document **EBGB3**²) also provides justification for the policy approach by providing a vision and framework for green and blue infrastructure (GBI) – including open spaces - as part of a coherent network. **EBGB7** is therefore in accordance with the London Plan 2021 (**ADP1**³) policy GB1 part B. **EBGB7** and **EBGB3** complement each other, and provide a robust evidence base informing the policy approach taken. **EBGB3** also provides GBI opportunities and projects which have fed into the Infrastructure Delivery Plan (document **EBID1**⁴).

¹ EBGB7- [LBH Open Space Study \(2018\)](#)

² EBGB3- [Hounslow Green and Blue Infrastructure Strategy \(2021\)](#)

³ ADP1- [London Plan \(2021\)](#)

⁴ EBID1- [Hounslow Infrastructure Delivery Plan \(May 2025\)](#)

3. In terms of the whether the evidence takes sufficient account of expectations set out in London Plan Policy G4, it is considered that the policy is suitably flexible to allow for London boroughs to establish their own open space typologies to reflect local circumstances (as stated in the text below table 8.1). Despite **EBGB7** predating the London Plan 2021, the study assessed many of the Policy G4 open space typologies (see table 2.4, p.11), in addition to other open space typologies (such as allotments, amenity grassland, natural and semi-natural greenspace etc - see Table 2.2, p.9). **EBGB3** also includes many of the typologies set out in G4 in its assessment of provision requirements. The Mayor of London has not raised any general conformity matters in relation to these policies.

b) Has a review been undertaken of the existing evidence to assess whether the conclusions relating to opportunities for provision and open space standards remain valid and, in such circumstances, would the Plan approach be justified?

Q1) (b) LBH Response:

4. Yes, the review of the evidence base concluded that the overall findings of Document **EBGB7** remain valid, and Document **EBGB3** provides complementary evidence in the assessment of open space as part of the wider multifunctional GBI network to help guide future provision requirements. **EBGB3** also provides further strategic opportunities and priorities which provide the basis for the open space and GBI projects that will help to meet future needs resulting from growth, and these are set out in the Infrastructure Delivery Plan (**EBID1**). It is considered that together these evidence base documents provide sufficient justification for the Plan approach.

c) Should the Plan include standards for public open spaces (including playing pitches and allotments), and clearly set out what open space is needed and is sought to be accommodated as part of development proposals where deficits are identified?

Q1) (c) LBH Response:

5. Policies GB2, GB3, GB8 and GB9 set out a sound framework for protecting and enhancing the various types of open space in Hounslow as part of the planning process. The evidence base has informed the policy approach by providing an assessment of overall open space needs (**EBGB7**), as well as providing an update on specific opportunities for enhancement and new provision (see **EBGB3**). This work has fed into the projects set out in the Infrastructure Delivery Plan (**EBID1**) to help facilitate the delivery of open space as a component of green and blue infrastructure to meet growth needs (see section 5.2, pp.29-45). This has also fed into site allocation 122 – Rectory Farm, which proposes the restoration of the allocated minerals site to open greenspace to create a new publicly accessible district scale park in an area of noted open space deficiency. This approach is consistent with national policy and is in general conformity with the London Plan.

d) Whether the definition of Local Open Space in the Plan is intended to be distinct from the designation of land as Local Green Space set out in national policy, and if so, whether this should be made clearer?

Q1) (d) LBH Response:

6. The Local Open Space (LOS) designation is clearly distinct from the Local Green Space (LGS) designation as articulated in the NPPF (**ORD3**⁵) at paragraphs 105-107. Policy GB2 part G. clearly sets out the policy for protection of LOS which is in line with NPPF paragraph 103 (rather than paragraph 107). The role of LOS is further defined in the supporting text to Policy GB2 at paragraphs 7.7-9.

e) Is the intention that development ancillary to a Local Open Space must preserve its predominantly open character; justified and consistent with national policy? Is such a policy expectation in Policy GB2 consistent with the provisions in Policy GB3?

Q1) (e) LBH Response:

7. Policy GB2, clause H. is intended to ensure that development proposals which are ancillary to open space designated as LOS (such as a sports pavilion or park maintenance sheds) are designed appropriately and would not undermine the

⁵ ORD3- [National Planning Policy Framework \(NPPF\) \(December 2023\)](#)

predominantly open character of the open space in question. The policy expectation was reviewed and it is considered to remain effective in decision-making relating to ancillary development proposals within designated LOS, allowing the designation to continue to serve its important open space function. It is considered that such an approach is not inconsistent with national policy.

8. Policy GB3 provides an additional policy approach covering proposals that include the development of expanded or new education facilities on open space land in education use (including where this open space is covered by policies GB1 or GB2), and sets out specific additional requirements to guide this form of development. This is done to ensure that, where educational institutions need to utilise surrounding land for extensions or the provision of new facilities which might be required to address additional student needs, this can be done in a way that makes the most effective use of the site whilst maintaining access to open space (in accordance with NPPF paragraph 127b). It is considered that the policies work together and would be effective in guiding decision-making.

<p>f) Whether in seeking that development proposals enhance and enable provision of publicly accessible Local Space, to ensure consistency with national policy, should the Plan clearly set out the contributions expected from development?</p>
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Q1) (f) LBH Response:

9. Policy GB2 part I. requires that major developments should enhance and enable the provision of publicly accessible Local Open Space through on-site provision wherever possible. The policy states that this applies especially in areas of open space deficiency (as identified by Document **EBGB3** or any superseding document), and particularly in areas of substantial change and intensification. Part I. also requires that, where appropriate, public access should be secured by S106 agreements to provide assurances that this will be maintained in the long term.
10. The expectation that contributions will be sought for LOS enhancements or new provision would therefore only apply where new on-site provision is not possible. This would have to be assessed on a case-by-case basis, and the expectation would be that any such contributions should be informed by the projects contained in Document

EBID1 (which will be updated regularly) and any other guidance produced by the Council. Each scheme would have its own viability considerations to consider, and any obligations sought around the provision of new or enhanced publicly accessible open space to address whether the impacts of a scheme can be made acceptable would be the subject of detailed considerations at application stage, consistent with NPPF paragraphs 55-58.

g) For consistency with national policy, should the Plan also include how contributions from development proposals will be calculated and identify the criteria for projects to be considered directly related to development, and fairly and reasonably related in scale and kind to the proposal?

Q1) (g) LBH Response:

11. No, it would not be necessary to set out this level of detail within the Plan itself in order for the Plan to be consistent with national policy. Please see response to question 1, part g), and to Matter 6, question 5, part a).

h) Whether the Plan approach to burial space, including Policy GB9 seeking preservation and availability of burial space, and Policies P2(c) and Site 57 insofar as they support potential expansion of Hatton Cemetery; positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan 2021?

Q1) (h) LBH Response:

12. Document **EBGB7** concludes that cemetery provision should be led by demand. Policy GB7 seeks to preserve burial space to ensure availability of provision to meet the borough's existing and future burial needs. Policies P2(c) and Site 57 support the potential expansion of Hatton Cemetery on adjoining land. As this is Council owned land, any expansion would be led by the Council in the event that demand for burial space increases within the plan period. It is considered that this represents a sound policy approach.

13. It should be noted that the Council and the Mayor of London have agreed positions on an approach to burial space provision within a statement of common ground

(Document **EX5e**⁶) following comments raised in the Mayor's representation to the Regulation 19 consultation (Document **S9**⁷, **REP074**).

- 2) Policies GB4 and GB5 relate to the green infrastructure network and blue ribbon network respectively; are they positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021? Responses should address:**
- a) Whether the components of each of the networks have been adequately mapped in full within the Plan or other parts of the development plan, to be sufficiently clear for decision makers when the policies should be applied?**

Q2) (a) LBH Response:

14. Yes, Policies GB4 and GB5 are sound. In relation to whether the GBI networks have been adequately mapped, the key designations and components are set out in the chapter 7 key map at Fig GB1 (p.194). This includes 'Local Green Grid – Strategic Links and Corridors' which are informed by the multi-functional opportunities mapping in Document **EBGB4**, combining areas for potential GBI, improved pedestrian and cycle links and nature recovery enhancements (including wildlife corridors). Key designations which make up part of the GBI network are also mapped within the Policy Map (Document **S2**⁸).

- b) If it is justified and consistent with national policy to have requirements linked to SPDs (including setting local targets for development proposals), SPGs, and other documents such as the South East Inshore Marine Plan, Hounslow Biodiversity Action Plan, the Hounslow Nature Recovery Action Plan and Thames River Basin Management Plan - rather than development plan policies?**

Q2) (b) LBH Response:

15. Yes. There are two references to SPDs in relation to GBI. The adopted Character, Sustainability and Design Code SPD (**SP1**⁹) provides detailed guidance on a range of design measures (in accordance with NPPF paragraphs 134 and 138) including GBI; it is

⁶ EX5e – [Statement of Common Ground between LB Hounslow and the Mayor of London \(October 2025\)](#)

⁷ S9 [Link to Representations made pursuant to Regulation 20 \(in response to consultation at Regulation 19 Stage\)\(Redacted\)](#)

⁸ S2 [Hounslow Local Plan 2020-2041 Proposed Submission Version: Policies Map](#)

⁹ SPD1 [Character, Sustainability and Design Codes SPD \(2024\)](#)

the intention that the guidance contained within this SPD will be updated following the adoption of the Plan to reflect any changes in policy, and this will be made available to help guide decision-making. Policy GB4 part G also refers to additional guidance which would seek to provide further assistance on the design of GBI, including the setting of local UGF scores, and the justification for this is set out in supporting text at paragraph 7.19. The policy does state, however, that prior to local UGF targets being set out within a supplementary document, developers should achieve the Mayor's interim target scores set out in London Plan Policy G5.

16. The South East Inshore Marine Plan (**EX1.41**¹⁰) is signposted to in Policy GB5 parts A. and H. to ensure that any development proposal affecting blue infrastructure within the marine plan area (i.e. the Tidal Thames) has considered any requirements under the marine planning regime.

17. References to Documents **EBGB9**¹¹, **EBGB2**¹² and **EX1.43**¹³ are included to signpost developers and decision-makers to these documents for further guidance and information that they should be mindful of.

c) Is the Tree Replacement Matrix set out in Table GB4.1, justified by evidence?

Q2) (c) LBH Response:

18. Yes. Document S1, paragraph 7.20 explains that the Tree Replacement Matrix at Table GB4.1 is informed by the Hounslow Tree Plan and Tree Management Policy (TPTMP) which is a subsidiary document to Document **EBGB3**. The TPTMP sets out the justification for requiring the replacement of trees lost to development to ensure that replacement trees are provided to secure at least the equivalent level of benefit provided by the tree/s lost. This approach is in general conformity with London Plan 2021 policy G7 part C.

¹⁰ EX1.41 – [South East Inshore Marine Plan \(2021\)](#)

¹¹ EBGB9 [Hounslow Biodiversity Action Plan \(2013\)](#)

¹² EBGB2 [Hounslow Nature Recovery Action Plan \(2024\)](#)

¹³ EX1.43 – [Thames River Basin Management Plan \(2022\)](#)

d) Are the requirements for development proposals to maintain a minimum 8m buffer strip to any main river, a minimum 16m buffer strip to the Thames Tidal defence, or a minimum 5m buffer strip to any ordinary watercourse – sufficiently clear of where such a measurement should be taken and justified by evidence?

Q2) (d) LBH Response:

19. These requirements were requested by the Environment Agency (EA) in their Regulation 18 and Regulation 19 representations (see Document S8¹⁴ and S9, specifically REP106). The Council consider the approach is effective and justified. It should be noted that as the EA are a statutory consultee, they would be able to assist developers by providing further guidance on the application of this policy in regard to detailed measurements for any buffer strips that may be required.

3) Policy GB7 relates to biodiversity - is it positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021? Responses should address:

a) Have the components of local wildlife-rich habitats and wider ecological networks, wildlife corridors and stepping stones that connect them, and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation – been identified and mapped in full in the Plan or elsewhere in the development plan, and safeguarded, as expected by national policy?

Q3) (a) LBH Response:

20. Policy GB7 is sound. In relation to the identification, mapping and safeguarding of habitat sites and other features identified in NPPF paragraph 185 a), the habitat designations are set out in the chapter 7 key map at Fig GB1 (p.194). The designations which make up part of the network of statutory and local habitat sites are also mapped within the Policy Map (Document S2). Safeguarding of these sites is achieved through Policy GB7, as well as the London Plan 2021 Policy G6 which is part of the development plan for Hounslow.

¹⁴ S8- [Regulation 22 Consultation Statement](#)

b) Would the Plan overall be effective in promoting the conservation, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity restoration and enhancement of priority habitats?

Q3) (b) LBH Response:

21. Yes, the Plan would be effective in achieving the requirements of NPPF paragraph 185 b) – specifically Policy GB7 parts B and C. See response to Q3)(c) below for details of how measurable net gains in biodiversity are proposed to be secured.

c) Is the approach to biodiversity net gain, effective, justified and consistent with national policy and the Environment Act 2021?

Q3) (c) LBH Response:

22. Yes. The approach set out at Policy GB7 part H (I. – V.) follows both DEFRA guidance¹⁵ and planning practise guidance (**EX1.02**¹⁶) (Paragraph: 006 Reference ID: 74-006-20240214) by seeking to propose local Biodiversity Net Gain (BNG) planning policy requirements which complement and expand upon the statutory framework without either duplicating elements of the framework or setting out any requirements that would be incompatible with it. Supporting text paragraph 7.30 explains the approach taken, which seeks to ensure that any habitat creation and enhancement to achieve BNG is considered early on in the planning process through the submission of a draft Biodiversity Gain Plan at application stage to demonstrate how the proposal would secure net gains in addition to other policy requirements.

23. Policy GB7 also sets out how biodiversity gains should support local nature recovery priorities (including applying strategic significance scores in the Defra Metric) and sets out expectations around off-site compensation and long term maintenance. This is justified by the evidence base, primarily Document **EBGB2**, and is consistent with the NPPF (paragraphs 180 d) and 185 b)) and the Environment Act 2021.

¹⁵ Please see ‘Biodiversity net gain: what local planning authorities should do’ Published 29 November 2023 at: <https://www.gov.uk/guidance/biodiversity-net-gain-what-local-planning-authorities-should-do>

¹⁶ EX1.02 – [National Planning Practice Guidance](#)

d) Is the requirement that major development proposals prepare ecological plans and strategies justified and consistent with national policy?

Q3) (d) LBH Response:

24. Yes. This is required to ensure major proposals have taken a comprehensive approach to landscaping and ecological considerations, in order that decisions can be made in line with the principles set out at NPPF paragraph 186. This approach also assists decision-makers to determine whether major developments have fully considered strategic nature recovery objectives and priorities set out in either Document EBGB2, or the emerging London LNRS (as required by the Environment Act 2021). The policy is therefore justified, effective and consistent with national policy.

e) Are the expectations of development proposals to contribute to the actions set out in the Hounslow Biodiversity Action Plan, the Hounslow Nature Recovery Action Plan and London Local Nature Recovery Strategy sufficiently clear for decision makers?

Q3) (e) LBH Response:

25. Yes. The policy signposts to these documents to ensure that development has considered ways in which contributions can be made toward the delivery of any relevant nature recovery opportunities that have been identified in the vicinity of a given development site. In the case of Document **EBGB9**, this also includes specific biodiversity actions which may pertain to a given development site. Specific habitat enhancement or creation projects identified in these documents are set out in Document **EBID1**, and these which be updated in future iterations of the IDP to support development proposals. These opportunities will therefore be available to inform negotiations around any obligations which may be sought to make a development proposal acceptable in planning terms as part of the development management process, consistent with NPPF paragraphs 55-58.

f) If financial contributions arise from the policy requirements, is it clear how they would be calculated, whether they have been viability tested and if they would otherwise be consistent with national policy?

Q3) (f) LBH Response:

26. The expectation that financial contributions would be sought to meet the requirements of GB7 would only apply where on-site provision is not possible, however this would not apply in the application of local BNG requirements as seeking financial contributions for these purposes would be inconsistent with the statutory framework (as per **EX1.02** paragraph: 006 Reference ID: 74-006-20240214 and 020 Reference ID: 74-020-20240214).

27. The policy does not explicitly state that financial contributions would be sought as a matter of course. For any non-BNG related financial contributions that may be sought in specific circumstances, these would have to be determined on a case-by-case basis and informed by relevant guidance. Document **EBV1**¹⁷ has tested the policy as part of a whole plan viability assessment and this does not find any viability issues with requiring certain developments to achieve requirements around BNG and GBI. Each scheme would of course have its own viability considerations to consider, and any obligations sought to ensure that a particular scheme could be made acceptable in planning terms would be the subject of detailed assessment to be considered through the development management process, as per NPPF paragraphs 55-58.

- 4) Policies CI1, CI2, CI3, CI4 and CI5 relate to the provision and protection of community facilities; education and school places; health facilities and healthy places; culture and leisure facilities, and places of worship respectively – are they positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021? Responses should address:**
- a) Would the policies, when taken together with other policies of the development plan, provide an appropriate and justified strategy to ensure sufficient provision is made for community infrastructure and facilities to support the intended levels of growth during the Plan period (including health, education and cultural infrastructure)?**

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

Q4) (a) LBH Response:

28. Yes, the policies are sound. Taken together, the policies provide sufficient protection for the various elements of community infrastructure (CI) defined in the supporting text, and set out expectations around when and how new CI should be provided to address community needs, as required by London Plan 2021 Policy S1. CI requirements and projects are set out in detail in Document **EBID1**, and as requirements change, these projects will be updated in future iterations of the IDP. **EBID1** and the policies therefore provide an overarching strategy to ensure sufficient provision of the various elements of CI is secured to support growth throughout the plan period.

b) Are the expectations of development proposals in terms of the contribution to community facilities in the Infrastructure Delivery Plan in Policy CI1 or as set out in Policy CI2, sufficiently clear and justified, including how they would be calculated and whether they have been subject to viability testing?

Q4) (b) LBH Response:

29. Yes. All policies have been viability tested within Document **EBV1**. Specific contributions for certain types of development may be sought where proposals are located within areas that have an identified community infrastructure need (as set out in Document **EBID1**), and where this is considered to be necessary to make the development acceptable in planning terms (as per NPPF paragraph 57). Developers will be directed to contribute toward specific projects set out in the IDP that would help to address any scheme-related impacts, and further viability assessment would be undertaken as part of the development process in accordance with NPPF paragraph 58.

c) Are the requirements of development proposals that would result in a loss of community facilities, including the vacancy requirements, sufficiently clear and justified?

Q4) (c) LBH Response:

30. Yes, the policy approach set out in Local Plan (2015)(Document **ADP2**¹⁸) has been reviewed and was considered to remain effective in decision-making, subject to a minor

¹⁸ ADP2 [Adopted Hounslow Local Plan Volume 1 2015-2030](#)

update to reflect consultation comments raised by NHS Property Services LTD (see Documents **S8**, **S9** and **REP045**). In their **REP045**, NHS Property Services LTD confirm that the policy update has been positively prepared in relation to the approach to surplus health or emergency service facilities which may be lost as part of wider public service estate reorganisation or service transformation. Following this update, it is considered that the policy has been made sufficiently clear and is justified.

d) Whether the expectations in Policy CI2 relating to impact on traffic, car parking and noise, are justified and consistent with national policy?

Q4) (d) LBH Response:

31. The policy is justified by the fact that new educational facilities have the potential to have a significant impact on the transport network, local car parking and public amenity if these impacts are not carefully assessed and managed. Policy CI2 is consistent with NPPF paragraphs 114 (especially d), 191 and 193, and is in general conformity with London Plan 2021 Policy S3, B. (see also paragraph 5.3.10).

e) Whether the requirements in Policy CI3 of major development proposals and those involving new hot food takeaways and betting shops are sufficiently clear to be effective and justified?

Q4) (e) LBH Response:

32. Yes, the policy is sufficiently clear. Further guidance to is provided in supporting text at paragraph 8.8. The policy is in conformity with London Plan 2021 policy GG3 and E9 (see in particular paragraph 6.9.5). These requirements were included at the behest of the Integrated Care Board (ICB)/ NHS London Healthy Urban Development Unit (HUDU) in their representation to the previous Focused Issues Review Regulation 18 Consultation (see Document **S8**).

33. It should be noted that further advice on the types of HIA required for different scales of development is already provided in the Council's validation list (which would be further updated following adoption of this plan), and the Council's Public Health team are

consulted on all applications and will liaise with developers to provide further advice and guidance as part of the development management process. This provides a sufficient level of clarity to ensure the policy remains effective.

f) Whether the locational expectations of culture and leisure facilities and the requirements to undertake appropriate assessments for noise and other potential impacts in Policy CI4 are justified and sufficiently clear to the effective for the purposes of decision making?

Q4) (f) LBH Response:

34. Yes. Accessible location requirements for cultural and leisure facilities are consistent with NPPF paragraph 96 and are justified by the assessment of community and leisure facility needs set out in Document **EBID1** (see section 5.3, pp.46-61). This policy would also need to be considered alongside policies in the Town Centres and Enhancing Connectivity chapters of the Plan. The noise and other impact requirements provide a specific approach to cultural uses and should be read in combination with policy EQ5. This is consistent with NPPF paragraphs 97, 191 and 193.

g) Are the requirements of development proposals seeking new, expanded or improved place of worship, effective, justified and consistent with national policy – including that all seemingly need to be accompanied by a Transport Assessment?

Q4) (g) LBH Response:

35. Yes, following a review, the policy is considered to remain effective in decision-making in relation to considering schemes for new or expanded places of worship (POW). Minor updates have been made in line with new agent of change requirements (consistent with London Plan 2021 Policy D13 and NPPF paragraph 193). The specific transport assessment requirement is informed by local experiences of high levels of traffic and congestion resulting from POW where these impacts have not been carefully managed as part of the planning process, especially at peak times and where these facilities are located in areas with minimal on-street parking or experience other access issues. The

policy expands upon the requirements set out in policy EC2 clause L. This is consistent with the NPPF paragraphs 114 to 117.

5) Are the approaches of Policies EQ1 and EQ2 which relate to energy and carbon reduction, and sustainable design and construction respectively - positively prepared, justified, effective and consistent with national policy, and would they be in general conformity with the London Plan 2021? Responses should address:

a) To what extent does the policy reflect the expectations of London Plan Policies SI2, SI3 and SI4?

Q5) (a) LBH Response:

36. Yes, policies EQ1 and EQ2 are sound. The policies have been drafted in accordance with London Plan Policies SI2, SI3 and SI4 in respect of minimising greenhouse gas emissions, supporting energy infrastructure and managing heat risk in new developments. To avoid unnecessary duplication, many of the detailed requirements of these London Plan policies are not repeated within the Plan policies, in line with NPPF paragraph 16, f). Please see Document **EX10**¹⁹ for specific justification for why local net zero carbon development requirements in Policy EQ1 go beyond the minimum expectations of policy SI 2. It should be noted that the Mayor of London has not indicated that there would be any general conformity issues in relation to these policies (see documents **S8** and **S9**, specifically **REP074**, and SoCG document **EX5e**).

37. The Council notes the objections received from developers in relation to certain aspects of these policies (see Documents **S8** and **S9**, **REP046**, **REP051**, **REP056**, **REP071**, and **REP099**), but considers that the approach taken in Policies EQ1 and EQ2 is fully justified by the evidence base and is in general conformity with the London Plan 2021.

b) Are the standards for sustainable design and construction as identified in Policy EQ2 and set out in Table EQ2.1, justified and consistent with national policy (including the Written Ministerial Statement Planning: Local Energy Efficiency Standards - 13 December 2023)?

¹⁹ EX10 – [Energy and Carbon Reduction Topic Paper \(October 2025\)](#)

Q5) (b) LBH Response:

38. Please see Document **EX10** for further details on how the approach toward setting net zero carbon requirements (which encapsulates local energy efficiency standards) is justified and consistent with national policy. In terms of the sustainable design (SD) standards set out in Table EQ2.1, these are focused on BREEAM standards for different types of development proposals, and it should be noted that these cover a broader range of SD matters than energy efficiency alone. The London Plan 2021 encourages the use of such standards at paragraph 9.2.7, and this approach is consistent with NPPF paragraphs 139 and 159.
39. Following a review of Document **ADP2**, these standards were determined to still be effective in promoting sustainable design, providing minor amendments were made in order to: accord with London Plan policy SI5, C), 2); to remove the threshold at which standards are required for non-residential new build schemes; and to provide further clarity for how mixed-use schemes should apply the standards.
40. It is noted that while some objections have been received in relation to requirements set out at Table EQ2.1 (see documents **S8** and **S9** e.g. **REP046** and **REPO093**), others have expressed support for the measures (**REP099**).

c) Are the other requirements of development proposals in Policies EQ1 and EQ2 justified and sufficiently clear to be effective for the purposes of decision making?

Q5) (c) LBH Response:

41. Yes, the other requirements set out in policies EQ1 and EQ2 are fully justified and sufficiently clear to be effective, and are in general conformity with the London Plan 2021.

6) Is Policy EQ3; positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan 2021 insofar as it relates specifically to flood risk and surface water management? Responses should address:

- a) Whether the approach is consistent with national policy which seeks to avoid inappropriate development in areas at risk of flooding by directing development away from areas at highest risk, and its associated approaches to flood defences, water management, drainage and Sustainable Drainage Systems (SuDs)?**

Q6) (a) LBH Response:

42. Yes, the approach set out in policy EQ3 is consistent with national policy (NPPF paragraphs 165-175). The policy ensures development proposals avoid inappropriate development in areas at risk of flooding by directing these away from areas at highest risk (see clauses B. and I.). In terms of associated approaches to flood defences, water management, drainage and SuDs, please see clauses A., C.-H. (inclusive), and J. to M. (inclusive). The Council have also completed an SFRA level 1 (**EBEQ3**²⁰) and level 2 (**EBEQ2**²¹) to support developers at application stage, including the application of the sequential test. The EA have also confirmed that the Plan is sound with regard to flood risk and water management (see **S8** and **S9**, **REP106**, and as agreed through SOCG **S10a**²²).

- b) Are the expectations of development proposals justified and consistent with national policy, in terms of requirements for additional evidence such as flood risk assessments, drainage strategies and compliance with greenfield runoff rates, and effective insofar as it is evident how a decision maker should react to planning applications?**

Q6) (b) LBH Response:

43. Yes, the policy sets out clear expectations for what evidence developers should provide, and how decision makers should interpret this when considering flood risk and water management as part of the planning process. The policy is justified as it is supported by the SFRA and is consistent with NPPF (paragraphs 165-175). Clause M provides a clear direction for the achievement of greenfield run off rates (to conform with the London Plan policy SI 13, B); clause L requests Drainage Strategies (including SUDs) in line with Policy SI 13 of the London Plan, and consistent with NPPF paragraphs 173 and 175; and

²⁰ EBEQ3- [West London Strategic Flood Risk Assessment Level 1 \(2024 Hounslow Update\)](#)

²¹ EBEQ2- [LB Hounslow Strategic Flood Risk Assessment Level 2 \(2024\)](#)

²² S10a [Environment Agency & LB Hounslow Statement of Common Ground \(2025\)](#)

clause i) requires developers to prepare flood risk assessments, consistent with the requirements of the Environment Agency and NPPF paragraph 173.

c) Is it sufficiently clear as to how any developer contributions arising from the policy requirements would be calculated (for example for off-site flood defences), whether they have been viability tested and would they otherwise be consistent with national policy?

Q6) (c) LBH Response:

44. Clause J sets out the expectation that developers should ensure that adequate flood defences are in place and maintained throughout the lifetime of the development, and that any residual risk should be adequately mitigated. This is consistent with NPPF paragraphs 165 and 173. It is not a policy expectation that s106 development contributions toward off-site flood defences will be required as a matter of course, however, in the event that contributions are sought to allow developers to meet the requirements of the policy (and to be considered acceptable in planning terms), these would have to be determined on a case by case basis. Additional information on flood defence strategic infrastructure requirements is set out in Document **EBID1** (pp. 43-45).

7) Is Policy EQ4 which sets out the approach to air quality; positively prepared, justified, effective and consistent with national policy, and would it be in general conformity with the London Plan 2021? Responses should address:

a) To what extent does the policy reflect the expectations of London Plan Policy SI1, including the presence of Air Quality Focus Areas as identified in its Figure 9.1?

Q7) (a) LBH Response:

45. The Policy has been updated to reflect London Plan 2021 policy SI 1 requirements. Policy EQ4 clause G specifically requires that developers demonstrate that design measures have been used to minimise new or existing users' exposure to air pollution within Air Quality Focus Areas (AQFA) and this is consistent with policy SI1, 2), d). No general conformity issues relating to this policy have been raised by the Mayor of London.

b) Are the expectations of development proposals justified and consistent with national policy, in terms of requirements for air quality assessments, management plans and design-stage mitigation measures?

Q7) (b) LBH Response:

46. Yes. The policy is in general conformity with London Plan 2021 policy SI1 and is consistent with NPPF para 192. Detailed justification for the approach is provided by local air quality evidence set out in the Hounslow Air Quality Action Plan (Document **EBEQ4²³**).

8) Policies EQ5 and EQ6 relate to noise and lighting respectively; are they positively prepared, justified, effective and consistent with national policy, and would it be in general conformity with the London Plan 2021? Responses should address:

a) Are the approaches to minimising noise disturbance and light pollution from development proposals, effective, consistent with national policy and in general conformity with the London Plan?

Q8) (a) LBH Response:

47. Yes, policies EQ5 and EQ6 are consistent with NPPF paragraphs 191 and 193, and are in general conformity with London Plan policies D3, D. 9); D8, B; D13; D14; and T8. The policies would be effective in addressing noise and light pollution impacts associated with new development.

b) Is the policy sufficiently clear regarding the circumstances in which development proposals should be supported by a noise assessment and/or a light assessment report, and if so, are the approaches both reasonable and proportionate so as to be justified?

Q8) (b) LBH Response:

48. Yes, the policy is sufficiently clear in relation to requirements for noise and lighting assessments. Policy EQ5 clause F sets clear parameters for when proposals would need to produce a noise assessment. Due to the many variables involved in determining when

²³ EBEQ4 [Hounslow Air Quality Action Plan 2023-2028](#)

a development is considered likely to give rise to light pollution issues (both in terms of potential sources and receptors), policy EQ6 is drafted to allow decision-makers greater flexibility to consider when such an assessment would be required.

9) Is Policy EQ7 insofar as it relates to sustainable waste management; positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan 2021, if it does not specifically protect existing waste sites in Hounslow as otherwise identified in the West London Waste Plan?

Q9) LBH Response:

49. Yes, policy EQ7 is considered to be sound in that it signposts to the waste planning policies set out in a separate development plan document: the West London Waste Plan (Document **ADP4**²⁴). The policy and supporting text also make clear that the review of Document **ADP4** is now underway. Policy EQ7 provides additional policy support for sewage and wastewater infrastructure and sets policy expectations around sustainable waste management measures which should be included within development schemes, both in terms of on-site arrangements and consideration of wastewater issues for major schemes.

50. It is noted that the Mayor of London has raised the matter of whether the policy safeguards existing waste sites in a representation (see **S8** and **S9, REP074**). Positions have since been agreed within a SoCG (Document **EX5e**) and both parties have agreed to present a modification to better signpost to the role of **ADP4** (and the updated Plan currently being prepared), and London Plan policy SI 9 which also sets out safeguarding requirements for existing waste sites.

10) Policies EQ8 and EQ9 relate to contamination and hazardous substances respectively; are they positively prepared, justified, effective and consistent with national policy, and would it be in general conformity with the London Plan 2021? Responses should address:

a) Whether the expectations of development proposals are sufficiently clear in terms of where those relating to contaminated land and/or hazardous

²⁴ ADP4 [West London Waste Plan \(2015\)](#)

substances would apply, justified in terms of the associated development requirements and effective insofar as how a decision maker should react?

Q10) (a) LBH Response:

51. Yes, policies EQ8 and EQ9 are sound. Policy EQ8 is consistent with NPPF paragraphs 189, 190, 191 and 194, and EQ9 is consistent with paragraph 45. Both policies are justified in that the requirements are informed by the specific regulatory regimes governing both contamination issues and hazardous materials, and associated guidance (as set out in the supporting text). The policies were drafted with support from specialist input from teams within the Council's Environmental Services department, and these teams are consulted upon when proposals are received on or near contaminated land (which is guided by detailed mapping and other data checked at scheme validation stage), or where proposed uses would involve hazardous substances. No general conformity issues have been raised in relation to policies EQ8 and EQ9.

11) Is Policy EQ10 insofar as it relates to minerals; positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan 2021? Responses should address:

a) To what extent does the policy reflect the expectations of London Plan Policy SI10?

Q11) (a) LBH Response:

52. Yes. Policy EQ10 has been drafted in accordance with the requirements and expectations of policy SI 10. The Mayor of London's Regulation 19 representation confirms that there are no general conformity matters with this policy (see **S8** and **S9, REP074**).

b) Are the intended safeguarding arrangements for sites with identified minerals reserves and railheads used for distribution, justified and sufficiently clear to be effective?

Q11) (b) LBH Response:

53. Yes, the minerals safeguarded land designation were informed by Document **EX1.63**²⁵ and have been largely carried over from adopted Plan **ALP2** with updates to reflect the fact that two sites are now allocated for minerals extraction (Rectory Farm and Land South of Western International Market). The map EQ10.1 and Policy Map are sufficiently clear on the locations of these safeguarded sites (minerals sites and railheads), and clauses B and D are clearly worded in terms of policy requirements and expectations.

54. It is noted that Day Group (**REP053** and **REP054**), support some elements of EQ10, but have also raised soundness concerns relating to the safeguarded railhead designation at Transport Avenue and have suggested modifications to the supporting text which we have agreed to present within document S11 (see modification code **HLP_C9_01**). Day Group also raise objections to the safeguarded minerals railhead designation as shown on the policy map (document **S2**), however the Council consider that the safeguarding designation would not necessarily conflict with the SINC, MOL and SIL designations where these designations partially overlap, and therefore the Council considers that a further modification is not required to address a point of soundness.

c) Is the policy sufficiently clear regarding the circumstances in which development proposals should be supported by environmental impact assessment and environmental management systems, and if so, are the approaches both reasonable and proportionate so as to be justified or otherwise consistent with national policy?

Q11) (c) LBH Response:

55. Yes. Various minerals extraction operations are covered in both Schedule 1 and Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, with Schedule 2 setting out the applicable thresholds and criteria to be considered for screening purposes for schemes which exceed the stated thresholds. The policy is to be read in conjunction with these regulations governing when an EIA would be required for development involving minerals extraction. Environmental Management Systems (EMS) are a recognised system by which a company can control environmental impacts associated with operations, and this is set out in a series by

²⁵ EX1.63 – [Hounslow Minerals Background Report \(2011\)](#)

international standards for environmental management which represent industry best practise. The policy is therefore considered to be sound.