

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

**Matter 8: Design, Tall Buildings and Heritage**

**London Borough of Hounslow Council Response**

**12<sup>th</sup> December 2025**



**London Borough  
of Hounslow**

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

### Matter 8 – Matter 8: Design, Tall Buildings and Heritage

**Issue:** Whether the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan in relation to design, tall buildings and heritage?

**Q1) Policies CC1 and CC2 relate to context and character, and urban design and architecture respectively; are they positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan 2021? Responses should address:**

**a. Whether the intended approach in Policy CC1 that all new development 'conserves' and takes opportunities to 'enhance' is justified and consistent with national policy, or should the approach be more closely linked to London Plan Policies D1 to D6, and different for development proposals that may affect the historic environment?**

#### **Q1) a) LBH Response:**

1. Yes. The approach asks new development to conserve and take opportunities to enhance existing places; the conservation and enhancement of the natural, built and historic environment is consistent with the NPPF 2023 (**ORD3**<sup>1</sup>); paragraphs 8 c) is the primary policy in this regard, and is also consistent with paragraphs 20 d), 195 and 196. Policy CC1 also demonstrates consistency with Policy D3 D 1) and 11) of the London Plan (**ADP1**<sup>2</sup>), which require form and layout to enhance local context and require quality and character to respond to the existing character.
2. The approach in CC1 also acknowledges that there are opportunities to transform areas (CC1 D, G I. and V). In accordance with Policy D1 of the London Plan and the Mayor's Characterisation and Growth Strategy LPG<sup>3</sup>, the Hounslow Characterisation and Growth Study (**EBCC2**<sup>4</sup>) establishes where either conservation, enhancement or transformation is the appropriate growth strategy for a particular area (pp. 42-73). The growth strategies take into consideration existing and planned infrastructure in conformity with D2 of the London Plan. Policy CC1 requires proposals to have regard to **EBCC2** and the Character,

---

<sup>1</sup> ORD3- [National Planning Policy Framework December 2023](#)

<sup>2</sup> ADP1- [London Plan \(2021\)](#)

<sup>3</sup> Characterisation and Growth Strategy LPG- <https://www.london.gov.uk/sites/default/files/2023-06/Characterisation%20and%20growth%20strategy%20LPG.pdf>

<sup>4</sup> EBCC2- [Hounslow Characterisation and Growth Study \(2024\)](#)

Sustainability and Design Codes SPD (**SPD1**<sup>5</sup>) and respond to the design recommendations (part G. I). This is also in accordance with Policy D4 A of the London Plan. Part G IV of CC1 requires development proposals to make best use of redevelopment opportunities, whilst respecting and enhancing the area's character and historic environment, in line with the design led approach at London Plan Policy D3. The SoCG signed with the Mayor (**EX5e**<sup>6</sup>) affirms "general conformity" with the London Plan. Other policies in the Plan address policies D5 and D6 of the London Plan.

**Q1) b) Whether the individual and cumulative policy requirements of development proposals in Policies CC1 and CC2 reflect the design-led approach in London Plan Policy D3 and are they sufficiently clear to be justified and effective, insofar as being evident how a decision maker should react to development proposals?**

**Q1) b) LBH Response:**

3. Yes. The Council considers that Policies CC1 and CC2 of the Local Plan, clearly espouses London Plan Policy D3 in reflecting the design led approach. Policy CC1 requires that all proposals must '*G IV. Make best use of redevelopment opportunities whilst respecting and enhancing the area's distinctive character and historic environment...*'; other parts of this policy require contextual and characterful responses from proposals in accordance with London Plan D3 parts A and D 1), and 11) – 14). Policy CC2 includes requirements to ensure that developments meet the requirements of London Plan policy D3. Policies CC1 and CC2 are supported by the Characterisation and Growth Study (**EBCC2**<sup>7</sup>), which sets out appropriate growth strategies (conserve, enhance or transform), and the Council refers to its answer to Q1a. This is in accordance with London Plan Policy D3 in respect of Part B to promoting the most appropriate form of contextual development and create capacity for growth, with due consideration to existing and planned supporting infrastructure.
4. The Council considers that this design-led approach is reflected throughout the suite of Local Plan policies, supported by the evidence (**EBCC2, SPD1**), which taken together provide a clear policy basis for the decision maker when determining a development

---

<sup>5</sup> SPD1- [Character, Sustainability and Design Codes SPD \(2024\)](#)

<sup>6</sup> EX5e- [Statement of Common Ground between LB Hounslow and the Mayor of London \(October 2025\)](#)

<sup>7</sup> EBCC2- [Hounslow Characterisation and Growth Study \(2024\)](#)

proposal. The SoCG signed with the Mayor (**EX5e**) affirms “general conformity” with the London Plan.

**Q1) c) Is the distinction between the status of other development plan policies and Supplementary Planning Documents as referred to in Policies CC1 and CC2, sufficiently clear and consistent with national policy?**

**Q1) c) LBH Response:**

5. 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**), in addition to a number of adopted LPGs (**EX1.28**<sup>8</sup>, **EX1.22**<sup>9</sup>).
6. 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.
7. The SPDs are referred to in the text of Policies CC1 and CC2, and the policy text makes clear they are SPDs relevant to the policies and that ‘regard’ or ‘reference’ should be given to them in the formulation of proposals and in decision-making.
8. Whilst a plan must be read as a whole and all policies apply, in some instances cross-referencing to other policies is necessary for comprehension and to provide clarity. CC1 and CC2 focus on the core criteria around context and design, with other referred to policies covering related issues and matters. This is consistent with national policy.

---

<sup>8</sup> EX1.28- [Mayor’s Housing Design Standards LPG \(2023\)](#)

<sup>9</sup> EX1.22- [Mayor’s Housing SPG \(2016\)](#)

**Q2) Policy CC3 relates to tall buildings; is it positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021? Responses should address:**

- a) Is the overall policy approach consistent with the expectations of Policies H1 and D9 of the London Plan in terms of identification of locations for tall buildings and optimising housing delivery in PTAL3 to 6 locations or within 800m distance of a station or town centre boundary, and the Framework insofar as it seeks to achieve well-designed places?**

**Q2) a) LBH Response:**

9. Yes. Policy CC3 is clear in identifying locations that may be suitable for tall buildings, which is consistent with London Plan (**ADP1**) Policy D9 (B) Tall Buildings. The locations are based on the combined evidence base of the Tall Buildings Study (**EBCC3**<sup>10</sup>) and Great West Corridor Masterplan (**EBCC4**<sup>11</sup>), which consider good public transport accessibility, and future planned infrastructure, and proximity to town centre, large neighbourhood centres and new local centres as a supporting factor for tall buildings in line with Policy H1 of the London Plan.
10. The Council refers to the Statement of Common Ground (SoCG) with the Mayor of London (**EX5e**), in which Section 4.8 addresses tall buildings; the Mayor agrees that the series of maps (Figs. CC 3.3-3.8) illustrating areas that may be suitable for tall buildings is broadly consistent with the London Plan Policy D9 B, however recommends that broader locations should be identified. The methodology used to identify tall building potential locations for all areas outside the Great West Corridor is detailed in **EBCC3**. The methodology undertakes a sieving process to identify the locations where tall buildings may be appropriate, taking into consideration sensitivities and supporting factors to tall building development. This results in the identification of broad Areas of Search, which may have potential for tall building development. In order to recommend the locations and appropriate heights for tall buildings, the study tests the impacts of views on heritage and townscape on sites with development potential within those Areas of Search, which allows for recommendations to be made that factor in important sensitivities. The methodology for identifying tall building locations and appropriate heights in the Great

---

<sup>10</sup> EBCC3- [Hounslow Tall Buildings Study \(2024\)](#)

<sup>11</sup> EBCC4- [LBH Great West Corridor Masterplan - Revision \(2020\)](#)

West Corridor (**EBCC4** and **EBCC4a**<sup>12</sup>) similarly takes a sieving approach, with the final stages assessing visual impact on specific sites and refining the heights and locations in response to any impact on heritage assets and townscape. The Council considers, therefore, that the tall buildings evidence base does not support identifying broader locations for tall buildings, as to ensure that the appropriate location and heights are robust the impacts of tall buildings can only be tested through this refined and site-specific approach. Designating broader locations as suitable for tall buildings could have unintended consequences for the significance of heritage assets and on townscape. A modification (**HLP\_C6\_15** in document **S11**<sup>13</sup>) is suggested to present the locations for tall buildings on one map to enhance clarity.

11. London Plan (**ADP1**) Policy D9 B also states that boroughs should engage with neighbouring boroughs that may be affected by tall buildings developments. Through the SoCG process, the Council has engaged with the London Borough of Richmond upon Thames (LBRuT), as set out in Sections 1 and 2 of the draft SoCG (V1.1 03/12/2025). Section 4.3 of the SoCG sets out an outstanding matter that LBRuT and Royal Botanic Gardens, Kew (as a joint signatory of the SoCG) have concerns regarding tall building clusters that could appear in views from the Kew World Heritage Site (WHS) and buffer zone. The Council's view is that it has taken the correct approach in accordance with the London Plan and NPPF 2023 (**ORD3**) in setting out appropriate areas for tall buildings through an understanding of character and the significance of heritage assets. Paragraphs 4.3.5-4.3.7 of the draft SoCG set out the Council's views on this point. The Council also refers to the Design and Heritage Background Paper (June 2025) (**EBCC1**<sup>14</sup>), which sets out how the evidence base underpinning CC3 has considered impacts of tall buildings on the significance of heritage assets, specifically the Royal Botanic Gardens, Kew World Heritage Site (RBGK WHS).

12. In addition to the plan-led approach to direct tall buildings to where they are appropriate, the criteria listed in CC3 are clear about design expectations for tall buildings, ensuring future tall building development meets the criteria at NPPF paragraphs 135. Part N I. of the CC3 refers to the Council's Character, Sustainability and Design Codes SPD (**SD1**),

---

<sup>12</sup> EBCC4a- [LBH Great West Corridor Masterplan - Views Appendix \(2020\)](#)

<sup>13</sup> S11- [Schedule of Suggested Modifications](#)

<sup>14</sup> EBCC1- [Design and Heritage Background Paper \(June 2025\)](#)

which offers further tall building design guidance in line with the NPPF's encouragement at paragraphs 133-134 for local authorities to establish design guidance and codes.

**Q2) b) Is the approach of identifying two definitions of tall buildings (higher scale areas - above 30m from ground level to the top of the building, excluding rooftop plant, and lower scale areas - above 21m from ground level to the top of the building, excluding rooftop plant) as given in Policy CC3, justified?**

**Q2) b) LBH Response:**

13. Yes. The Council refers to Section 1 of Design and Heritage Background Paper (June 2025) (**EBCC1**), which outlines the policy context for defining tall buildings (London Plan (**ADP1**) Policy D9, the Characterisation and Growth Strategy London Plan Guidance (June 2023)) as the policy justification for having two definitions of tall buildings. A detailed analysis of building context heights is set out in section 4.9 of the Tall Buildings Study (**EBCC3**) to assist in establishing the definition of a tall building, which the aforementioned study defines at section 5.3.

14. The Council refers to the draft SoCG with Historic England (**EX5h**<sup>15</sup>) and the description of the outstanding matter from Historic England on the 1<sup>st</sup> row of Appendix B: Table of Outstanding Matters, which questions whether a higher definition of tall buildings is helpful and what it achieves in respect to buildings of 6-10 stories in certain locations and the Council's comment in response to this.

**Q2) c) Is the identification of the locations in Figure CC3.1 that are considered suitable for higher scale tall buildings and lower scale tall buildings appropriate, informed and justified by robust evidence, and are the locations sufficiently precise?**

**Q2) c) LBH Response:**

15. Part K of the Policy CC3 states: "Be located in the areas identified as having potential for tall buildings, as shown in Figure CC3.1" incorrectly references the Tall Building's definitions map. The reference should have instead referred to "Figures CC3.3-3.8" and a modification is suggested to amend this error. The Council refers to the draft SoCG with

---

<sup>15</sup> EX5h- [Statement of Common Ground between LB Hounslow and Historic England \(December 2025\)](#)

Historic England (**EX5h**) Comment Ref HE22, which requests that one map is presented with all areas identified as having potential for tall buildings, as opposed to the series of maps for each area. The Council proposes a subsequent modification in line with this. In respect of the locations being sufficiently precise, the Council refers to the response to Q2a).

**Q2) d) Whether Policy CC3 Park K is sufficiently clear to be effective in guiding development proposals to the respective locations identified in Figure CC3.1?**

**Q2) d) LBH Response:**

16. Yes. The Council refers to the suggested modification highlighted in the Council's response to Q2c above, which it considers will ensure that the policy is clear and effective to guide development proposals to the areas that are identified as having potential for tall buildings.

**Q2) e) Are the maximum permissible heights set out in Table CC3.2 and referred to in Policy CC3 for sites, areas and existing tall building clusters, justified by evidence and in general conformity with London Plan Policies D3 and D9 - particularly in terms of the design-led approach and consideration of impacts arising from development proposals?**

**Q2) e) LBH Response:**

17. Yes, the Local Plan's approach to setting heights is consistent with London Plan (**ADP1**) Policy D3 and Policy D9. With regard to general conformity with D3, the Council refers to its response to Q2(a), and to the approaches taken to testing the appropriate heights for each tall building site in either the Tall Buildings Study (**EBCC3**) or the Great West Corridor Masterplan (**EBCC4**) and associated Views Appendix (**EBCC4a**). The Council also refers to Section 4 of the Design and Heritage Background Paper (June 2025) (**EBCC1**), which explains the methodologies taken to establish the appropriate heights for development in each of these evidence base documents and their similarities.
18. In relation to a consideration of impacts arising from development proposals (Policy D9), each of the aforementioned studies set out an assessment of potential impacts of tall



buildings on townscape, views and heritage assets for each of the sites in Table CC3.2. Background Paper **EBCC1** acknowledges that the representative views analysis (which helps to consider the impacts arising from development proposals) in the GWC Masterplan is more intensive than in the Tall Buildings Study, which the Council considers is a proportionate approach given the proximity of the GWC Opportunity Area to the WHS at Kew. Section 5 of the Background Paper sets out how the assessments of the impacts of the proposed heights in each of these evidence studies are in conformity with various policy and guidance documents.

19. Pursuant with the Mayor's advice, the Council proposes a modification to amend the term 'maximum permissible' used at table CC3.2 to 'appropriate heights' as per Policy D9 of the London Plan, as set out in the SoCG (**EX5e**).

**Q2) f) Are the requirements of Policy CC3 Part N in general conformity with London Plan Policy D9 insofar as consideration of impacts arising from development proposals? If not, are any differences justified by evidence and/or local circumstances?**

**Q2) f) LBH Response:**

20. Differences arise only in parts III, IX, and XIV. The inclusion of Part III, which requires tall building development to integrate sustainable and passive design principles, is justified by London Plan (**ADP1**) Policy SI2, which introduces the energy hierarchy. Part IX requires tall building developments to provide for biodiversity within the building form, which is a requirement of Boroughs in London Plan Policy G6 B (Part B 4) to "seek opportunities to create other habitats, or features, such as artificial nest sites, that are of particular relevance and benefit in an urban context" and Part D which requires development proposals to manage impacts on biodiversity and secure net biodiversity gain. The requirement for developments to incorporate innovative approaches to providing communal and private amenity space in Part XIV is justified by London Plan Policy D6 Part F 9) and the emerging Plan's own amenity standards in Policy SC5, which requires innovative design thinking to incorporate sufficient amenity space in dense and tall development. All other requirements are in "general conformity" with Policy D9 of the London Plan.

**Q2) g) Is the approach to buildings that do not meet the tall building definition, but which are still considered to be prominent in their surrounding context, justified and sufficiently clear to be effective, insofar as being evident how a decision maker should react to development proposals?**

**Q2) g) LBH Response:**

21. Yes, Part O. of the policy should be read alongside supporting text 6.15, which signposts to the Tall Buildings Study (**EBCC3**) for an understanding of context heights and the Character, Sustainability and Design Codes SPD (**SPD1**) for an understanding of the borough's character and contextual design responses. A modification is proposed to Part O (**HLP\_C6\_28**) and supporting text (**HLP\_C6\_31**) (document **S11**<sup>16</sup>) to aid with clarity.

**Q2) h) Whether the definitions of metropolitan scale, district scale and local scale tall buildings relating to context height ratio as set out in paragraph 6.15 are justified? If so, is the influence of those definitions on the suitability of a development proposal for a tall building sufficiently clear in Policy CC3 to be effective, insofar as being evident how a decision maker should react?**

**Q2) h) LBH Response:**

22. The Council refers to its answer to Q2 (g).

**Q2) i) Is the approach of Policy CC3, when taken with Figure CC3.1 and Table CC3.2, justified and consistent with national policy when having regard to the presence of Public Safety Zones relating to Heathrow Airport? If so, for effectiveness, should the Plan be clearer in terms of the locations where such a designation applies?**

**Q2) i) LBH Response:**

23. The Council refers to its answer to Q2 c) with respect to figure CC3.1. The appropriate areas for tall buildings and the appropriate heights for each location have been informed by the Public Safety Zone, as set out in section 4.6 of the Tall Buildings Study (**EBCC3**). Requirement N. X requires development to comply with the requirements of the Public

---

<sup>16</sup> S11- [Schedule of Suggested Modifications](#)

Safety Zone. It would not be effective to include maps or further reference to the Public Safety Zone within the Local Plan due to the propensity to change.

**Q2) j) Whether the approach of Policy CC3, when taken with Figure CC3.1 and Table CC3.2, has taken sufficient account of the presence of designated and non-designated heritage assets and their settings, and is consistent with the relevant statutory duties and associated national policy seeking to conserve and enhance the historic environment?**

**Q2) j) LBH Response:**

24. The Council refers to its answer to Q2 c) with respect to figure CC3.1. The Council refers to Sections 4 and 5 of the Design and Heritage Background Paper (**EBCC1**), which further explains how the Tall Buildings Study (**EBCC3**), the Great West Corridor Masterplan (**EBCC4**) and associated Views Appendix (**EBCC4a**) have considered the impacts of potential development on designated and non-designated heritage assets and their settings to determine the locations for, and appropriate heights of, tall buildings within the borough, consistent with national policy (NPPF (**ORD3**) paragraphs 202, 208 & 219). The Council also refers to the draft SoCG with Historic England (**EX5h**) where section 3.3 sets out the discussion between the parties on this matter. In response to requests from Historic England, a modification is proposed to CC3N X. to clarify the requirement for developers to undertake heritage impact assessments in certain circumstances.

**Q2) k) Should the Plan be clearer in terms of any zones of influence and key views intended to be preserved, particular in terms of the setting of the Royal Botanical Gardens Kew World Heritage Site and any buffers zones that are justified in the context of Policy CC4?**

**Q2) k) LBH Response:**

25. Minor modifications are proposed to enhance clarity regarding the conservation of key views from the Royal Botanic Gardens Kew World Heritage Site (RBGK WHS) and Buffer Zone. The Council refers to the draft Statement of Common Ground with Historic England (**EX5h**) that seeks to propose a modification to the supporting text at CC4 to clarify expectations of developers where proposals may affect the Outstanding Universal Value (OUV) of the RBGK WHS (suggested modifications in response to comment ref. HE48),

and to give an overview of the elements of setting that contribute to the OUV of the WHS, within and beyond the Buffer Zone (suggested modifications in response to comment ref. HE57). The Council does not consider that any further modifications are needed to enhance clarity.

**Q3) Is the approach in Policy CC4 relating to heritage; positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan 2021? Responses should address:**

- a) Whether the approach is consistent with national policy which seeks to conserve and enhance the historic environment; particularly the approaches to proposals affecting heritage assets, the significance of heritage assets, substantial or less than substantial harm, heritage at risk and sites of archaeological importance?**

**Q3) a) LBH Response:**

26. Yes, subject to suggested modifications outlined in the Schedule of Suggested Modifications (**S11**), the draft SoCG with Historic England (**EX5h**), which seek to align wording with national policy, and to suggested modifications in the SoCG with the Mayor (**EX5e**) to respond to London Plan policy HC2, the Council considers that Policy CC4 is consistent with the NPPF (**ORD3**) and the London Plan (**ADP1**) with regards to heritage.

**Q3) b) Is the Plan justified and effective in terms of the location of designated and non-designated assets in Hounslow, or where that up-to-date list is available for applicants and decision-makers?**

**Q3) b) LBH Response:**

27. The plan highlights the most pertinent designated heritage assets on figure CC1. A modification is suggested through the SoCG with Historic England (comment ref. HE60, **EX5h**) to add other designated assets to the figure. The SoCG acknowledges that listed and locally listed buildings cannot be shown on the map for presentational purposes, which is agreed with Historic England.

28. The full statutory lists and registers are available at Historic England's website. The full local list is available at Hounslow's website and is referenced in the policy's supporting facts. The Historic Environment Record and Archaeological Priority Area records are maintained by GLAAS Historic England.

**Q3) c) Is any duplication or departure from national policy with respect to the range of designated heritage assets or non-designated assets (including those of archaeological interest) covered in the policy; necessary and justified?**

**Q3) c) LBH Response:**

29. It is considered that there is no duplication or departure from national policy. NPPF (ORD3) paragraphs 205-209 consider weighing planning balance in respect of potential impacts on significance as a result of substantial harm, less than substantial harm or loss of different types of designated and non-designated heritage assets and their setting (paragraph 201). Policy CC4 provides the same categories, however, expands on how local policy will be implemented regarding these assets.

**Q3) d) Notwithstanding the above, are the policy requirements – justified and sufficiently clear so that it would be evident how a decision maker should react to relevant development proposals and their influence upon the different types of designated and non-designated heritage assets and their settings (where appropriate)?**

**Q3) d) LBH response:**

30. Yes, the Council considers that the policy is reflective of the relevant statute, NPPF (ORD3) and PPG. Modifications to CC4 are suggested in the Schedule of Suggested Modifications (S11), and in SoCGs with Historic England (EX5h) and the Mayor (EX5e), which help to clarify the policy requirements for decision makers.

**Q3) e) For effectiveness and to ensure consistency with national policy, should non-designated heritage assets be dealt with separately from designated heritage assets - particularly noting that the approach to effects on significance in national policy are different?**

**Q3) e) LBH response:**

31. Modification **HLP\_C6\_39** is suggested following advice from Historic England; the amended text is in accordance with NPPF (**ORD3**) paragraphs 205 to 209, which set out a clear hierarchy and difference in approach regarding any effect on significance. Policy CC4 makes it clear in each sub-section regarding each type of asset how the impact should be considered.

32. This policy is a slightly modified version of the same policy which was found sound (with modification regarding this issue) in 2015 and it is presented in a very similar manner. National Policy has not changed in regard to the assessment of significance between 2012 and 2023, so therefore the 2015 policy was found sound against the same framework that we have now. Some changes have been made for updates in policy, but none were considered necessary in terms of the separation of designated and non-designated heritage assets.

**Q3) f) Where there the policy allows for consideration of subsequent updates of existing evidence, to be justified and effective, should it be clear that those updates should be relevant to the scope of the specific documents (i.e. Hounslow Characterisation and Growth Study, Tall Buildings Study, SPDs, etc)?**

**Q3) f) LBH response:**

33. It is clear within parts H and I that subsequent updates are specific to the documents referenced.

**Q3) g) If the strategic and local views sought to be conserved or enhanced are justified by evidence, should they be clearly identified in the Plan?**

**Q3) g) LBH response:**

34. The Policy refers to views found in the Hounslow Characterisation and Growth Study (**EBCC2**) and the Character, Sustainability and Design Code SPD (**SPD1**) and makes reference to the designated views in relation to the RBGK WHS. Policy CC4 of the adopted

Local Plan 2015 (**ADP2**<sup>17</sup>) similarly refers to strategic and local views in other documents; the current policy framework is effective at achieving the policy aims. Views based on justified evidence, for example those in the Views Appendix are based on those in the Kew Gardens Management Plan and taken from CAAs and other management plans.

**Q3) h) Whether the specific approaches to registered parks and gardens, and listed buildings at risk, in Policy CC4 requirements of development proposals or actions to be taken by the Council?**

**Q3) h) LBH response:**

35. Regarding registered parks and gardens, the Council refers to suggested modification **HLP\_C6\_50** and a subsequent addition in the draft SoCG with Historic England (**EX5h**, comment ref. HE54). The proposed modified policy sets out a combination of actions to be taken by the Council and requirements of developers. Regarding listed buildings at risk, the proposed modification **HLP\_C6\_52** suggests a modification to the sub-title; the policy text sets out an action to be taken by the Council.

**Q3) i) Whether the approach to enabling development is justified, or should it otherwise be omitted to ensure consistency with national policy?**

**Q3) i) LBH response:**

36. The Council refers to NPPF (**ORD3**) paragraph 214, which allows LPAs to assess whether the benefits of a proposal for enabling development that would secure the future conservation of a heritage asset would outweigh the disbenefit of conflicting with planning policies. CC4 F is therefore considered to be consistent with national policy.

**Q4) Is Policy CC5 consistent with the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 and national policy insofar as advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts? Are the associated requirements of development proposals in Policy CC5 for advertisement panels, hoardings and structures - effective?**

---

<sup>17</sup> ADP2- [Adopted Hounslow Local Plan Volume 1 2015-2030](#)

#### **Q4) LBH response:**

37. Yes, the regulations consider amenity to ‘the general characteristics of the locality’ (regulation 3 (2a)) and public safety to include ‘the safety of persons using a highway (regulation 3 (2b i)...’. Policy CC5 seeks to ensure advertisements respect context through parts G-K and M and public safety through part L. This policy is a slightly amended version of a policy that was found sound in 2015. The Council refers to the 2015 Inspectors Report <sup>18</sup>.

38. These changes have not been reversed, and the 2007 Advertisement Regulations are still in place, so the Council considers this policy to be sound in scope.

39. With regards to effectiveness, the Council has dealt with 25 advert appeals since 2019 and won 17 of these, which is a 68% win rate.

**Q5) Policy SC7 relates to residential extensions and alterations; is it positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should address:**

**a) Whether for effectiveness there should be clearer cross-referencing to relevant heritage policies?**

#### **Q5) a) LBH response:**

---

<sup>18</sup> “Issue 11 – Whether the policy for advertisements is sound, or can be made so?  
162. Policy CC5 sets out criteria for determining applications for proposals for advertisements. However it includes criteria that would not accord with the limited scope of the Town and Country Planning (Control of Advertisement) Regulations. In particular the regulations only allow a local planning authority to exercise its powers under the regulations in the interests of amenity and public safety whilst taking into account the provisions of the development plan, so far as they are material, and any other relevant factors. In this context, whilst the economic development benefits of advertisements may be a relevant factor, it is not appropriate to only allow advertisements where they would support regeneration objectives, as Policy CC5 suggests. Amenity and public safety should be the overriding considerations.  
163. Main modification MM19 would therefore amend Policy CC5 to make it sound by concentrating on amenity and public safety to ensure consistency with national policy and the scope of the advertisement regulations. Whereas a Representor considers the modified wording of CC5(b) to be onerous in seeking to improve amenity, that is a general commitment by the Council. It is not a requirement that every advertisement proposal must satisfy and is thus not onerous. However the wording of the Proposed Modifications lacks clarity as published for public consultation and includes duplication. I therefore agree to a further change proposed by the Council that would delete criterion (b) and make minor wording changes to criterion (d).”



40. Parts A, B, G and H of the Policy and associated notes refer to SPDs that users would be encouraged to consult, including Conservation Area Appraisals and the Character, Sustainability and Design Codes SPD (**SPD1**), which includes a section on residential extensions in conservation areas. It is not considered that further reference to Policy CC4 is needed, as this is a cover all policy for both those proposals involving heritage assets and those not. The policy is largely the same as the 2015 adopted plan (**ADP2**), with some modifications and additions for updated policy. The position in 2015 was that SC7 was acceptable with one modification (which has been carried over) and it was considered reasonable to expect users to also look to consult the Character and Context policies in Chapter 6 of the Local Plan 2015 for those on both Design and Heritage.

**Q5) b) If changes are required to ensure consistency with national policy in terms of the status of development plan policies, supplementary planning documents and other relevant material considerations?**

**Q5) b) LBH response:**

41. The policy requirement to ‘have regard to’ SPDs is consistent with NPPF (**ORD3**) paragraph 139, which states that development should be refused where it fails to take into account local design policies, guidance and SPDs. Changes are not considered necessary and were the subject of the previous modification in 2015, which is referred to in Part a) and in the 2015 Inspectors Report<sup>19</sup>.

**Q5) c) Whether the approach to relationships with neighbouring properties is consistent with national policy, and provides sufficient safeguards to prevent unacceptable harm relative to all potential effects of a residential extension or alteration?**

---

<sup>19</sup> “114. The wording of Criterion (h) - renumbered as Criterion (i) should therefore be amended to allow for flexibility in the use of design standards and by amending the reference to supplementary planning documents.

137. ...MM14 would strengthen the policy wording in the interests of effectiveness. However, whilst SPD can provide useful explanation of the policy and guidance on detailed matters, the Local Plan policy should not be used to make SPD provisions mandatory development plan requirements, as some Representors would wish. ...”

**Q5) c) LBH response:**

42. Yes, one of the core principles of the planning system as per the NPPF (**ORD3**) is to create places that have a 'high standard of amenity for existing and future users' (para 135 f). The Council refers to its answers to questions Q5a) and Q5b); the policy is largely replicated from the 2015 Plan, as the National Framework has not changed since in this regard.

**Q5) d) If it is justified to seek to impose requirements on outbuildings, extensions and alterations carried out under householder permitted development right?**

**Q5) d) LBH response:**

43. Yes, it is appropriate that the local planning authority sets out policy on extensions with the aspiration that development respects character and local context. The policy has due regard to the General Permitted Development Order. See previous responses regarding soundness in 2015, including in this regard. The Council refers to paragraph 5.33 of the supporting text of policy SC7, which clarifies that there is no need for planning permission if there's a PD right. It is clear that the policy encourages those promoting such developments to reflect the Plan's policies and guidance. This aims to ensure good design across the breadth of PD and non-PD developments and create a coherent townscape and streetscape.