



Quod

R22 Local Plan

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

Hounslow Local Plan

St James Group Ltd

DECEMBER 2025

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- 1.1 On behalf of St James Group Ltd ('St James'), Quod submits this hearing statement in respect of Matter 7: Green and Blue Infrastructure, Community Infrastructure and Environmental Quality. This hearing statement responds to Matters Issues and Questions (MIQs) (IN03) issued by the Inspector on 24th November 2025.
- 1.2 St James have entered into a partnership with Sainsbury's to bring forward the redevelopment of the Sainsbury's Chiswick store and car park and are currently in pre-application discussions with the Council.
- 1.3 The Sainsbury's site represents the largest development site within Chiswick and is identified under emerging Site Allocation 107 to deliver a minimum of 300 homes and 5,300sqm of replacement retail floorspace.
- 1.4 Our client submitted representations at Regulation 18 ('R18') and 19 ('R19') stage and continues to be engaged at Regulation 22 stage (S1) (the 'Plan').
- 1.5 This hearing statement should be read in conjunction with the hearing statements submitted for Matters 1, 2, 3, 4, 6, and 8 the key points of which are summarised below:
- 1.6 The Plan is being prepared at an unprecedented time for London. The Government's¹ clear intention is to make rapid progress toward universal Local Plan coverage because they remain essential to facilitating the effective delivery of housing, jobs and infrastructure. However, to achieve this, the Government expects Inspectors to exercise a degree of flexibility to avoid seeing the adoption of poor-quality plans. We agree that flexibility is required here for the following reasons:
 - 1.6.1 This Plan is being heard against the previous Framework from 2023. It does not consider the Standard Method which proposes to increase housing from London Plan levels of 1,782dpa, to 2,052dpa to address affordability issues. Instead, the Council is proposing to reduce housing delivery over the plan period to an average 1,092dpa from 2030-2041. The Mayor has raised concern with this approach in the Statement of Common Ground between the Council and the Mayor of London (EX5E), and we do not consider that this approach is positive.
 - 1.6.2 The Mayor of London and Government² are proposing emergency measures now to address *'the housing emergency, a national priority'*. The Government acknowledges *'That need is particularly acute in London. Housebuilding in the capital has faced*

¹ The Minister of State for Housing and Planning, Matthew Pennycook MP letter to the Planning Inspectorate, 9th October 2025

² London Plan Guidance Support for Housebuilding and Emergency Housing Package, November 2025

significant challenges over recent years – including the impact of the Covid-19 pandemic, high interest rates, spiralling construction costs, regulatory blockers and wider economic conditions. As a result, more than a third of London boroughs recorded zero housebuilding starts in the first quarter of this year. The Government and the Mayor of London are determined to do what it takes to tackle London’s housing crisis’. This emergency is not recognised in the Plan, and the Whole Plan Viability Assessment (EBV1) (2024) is dated in this respect and does not demonstrate viability of the cumulative policies of the Plan, the threshold and promotes individual viability assessments at application stage to overcome this.

1.6.3 The borough has seen a sharp decline in its Housing Delivery Test results, dropping close to the 75% threshold. Only 668 homes were started in the borough in 2024/25, and 112 recorded to date (25/26). Once adopted the new London Plan housing figures will apply to the borough ‘*London has a stretching but realistic housebuilding target of 87,992 homes per year*’. These will supersede the Plan, and the remaining policies of the Plan will need to adapt to these new housing levels otherwise they will be out of date.

1.6.4 The Council is promoting the release of greenfield land to meet future development requirements. It proposes to de-designate Green Belt (38ha) and use existing open space for housing, industry and traveller accommodation. We do not consider that the Council has sufficiently optimised its accessible, brownfield town centre sites as part of this strategic decision. For example, throughout the preparation of the Plan, the indicative capacity of Site Allocation 107 (S1Aa) has been reduced by 23% from 390 to 300 homes with no justification provided within the Site Allocations and Capacity Assessment (EBSC2).

1.7 Therefore, crucial to the success of this Plan, is that it is prepared positively in a way that is aspirational but deliverable, contains clearly written and unambiguous policies, and avoids unnecessary duplication of policies (that appear in the Framework and London Plan)³. We consider that this can be achieved by the following:-

1.7.1 Recognition that there is a housing emergency.

1.7.2 Applying flexibility within policies to secure deliverability as the priority of the Plan. Policies which constrain delivery and viability should be revisited or revised.

1.7.3 Awarding equal weight to the affordable housing threshold approach and the viability tested route and the level of affordable housing arising from either approach.

1.7.4 Recognition that the Whole Plan Viability Assessment (EBV1) upon which policies of the Plan are based (1) does not demonstrate deliverability of the affordable threshold proposed for the majority of sites; (2) excludes abnormal costs which are incurred with the majority of brownfield site development; (3) advocates use of the viability tested route because of viability concerns; and (4) weight should be applied to viability assessments.

³ Framework, paragraph 16

- 1.7.5 Incorporate the wording accepted by the local plan inspectors for Tower Hamlets Local Plan Policy D.SG5 wording to ensure site allocation deliverability *“For site allocations, the policies set out in this plan may be applied flexibly to ensure that the sites are viable and deliverable”*.
- 1.7.6 At 276 pages, it is not clear that this Plan has not duplicated policies throughout. Policy CC2 ‘Urban Design and Architecture’ for example is four pages long, comprising 34 limbs and 11 sub-limbs and refers to four other plans and SPDs. Policy CC3 ‘Tall Buildings’ is three pages long, and has 15 limbs, and 17 sub-limbs. Policy CC4 heritage is four pages, with 31 limbs and 6 sub-limbs. Any major development assessed against these 3 policies alone will need to consider 80 limbs and 34 sub-limbs, 114 policy requirements in total, in addition to the design policies in the London Plan and Framework. This does not suggest compliance with the Framework.

Executive Summary of Matter 7

- 1.8 Policy GB4 should explicitly define *“trees of value”* in line with BS5837:2012 and LP2021 Policy G7.
- 1.9 Policy GB7 should clarify that BGP & HMMP are only required as pre-commencement and that reliance on Hounslow’s NRAP should only be transitional until the LNRS is adopted.
- 1.10 Contributions associated with Policies EQ1 and EQ2 (carbon offset rate and 65% on-site energy standard against Part L) are unjustified and risk undermining viability.

Issue: 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?

Q2: 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:

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

- 1.11 It is unclear if the Policy GB4(l) as drafted is suggesting that all *“mature trees and trees of value”* if removed for development should be replaced as per the policy Table GB4.1,
- 1.12 Table GB4.1 shows that existing trees of certain sizes may prompt anywhere between 1x or 8x new trees for 1 lost. This appears to divert from the *“value”* approach set out in London Plan Policy G7(c) which states that *“there should be adequate replacement based on the existing value of the benefits of the trees removed”* determined by i-Tree or CAVAT, or another appropriate value system.
- 1.13 Supporting paragraph 7.20 of Policy GB4 states that The Hounslow Tree Plan and Tree Management Policy (TPTMP), a subsidiary delivery document to the Hounslow Green and Blue Infrastructure Strategy (GBIS) (EBGB3), is the appropriate valuation system for determining existing benefits as per London Plan 2021 (LP2021) Policy G7.

1.14 Appendix A (Planning Obligations – Trees) of the TPTMP assumes that Category A and B trees should be retained. The tree replacement will not apply to Category U trees or Category C trees that would not be compatible with a new site layout. Table A.1 (Hounslow Tree Replacement Policy) forms the assumptions made in Table GB4.1.

1.15 Whilst detail has been provided with the TPTMP, greater clarity on defining what a ‘tree of value’ should be made within the policy wording. For example, LP2021 Policy G7(c) has at footnote 140 refers existing trees of value includes Category A, B and lesser trees where these are considered by the LPA to be of importance to amenity or biodiversity as defined by BS5837:2012.

Q3: 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:

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

1.16 Policy GB7(E) promotes the qualitative enhancement of biodiversity assets, including improved access, strengthened ecological connectivity and the creation of new habitats. This aligns with the Framework⁴, which requires Local Plans to protect and enhance biodiversity and to secure measurable net gains for nature.

1.17 Policy GB7(H)(i–v) sets out the mechanisms through which development proposals are expected to deliver a minimum 10% biodiversity net gain. In particular, it requires the submission of a Biodiversity Gain Plan, including the DEFRA Statutory Metric, structured around the mitigation hierarchy (on-site, adjacent land, or off-site provision), together with a Habitat Management and Monitoring Plan (‘HMMP’) to demonstrate how the biodiversity gains will be secured, maintained and monitored for a minimum period of 30 years.

1.18 This approach is broadly consistent with the statutory framework established under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), which requires developments to achieve at least a 10% uplift against the pre-development biodiversity value of on-site habitats.

1.19 To ensure consistency with the Environment Act 2021⁵ and the PPG⁶, Policy GB7 should clarify that only draft Biodiversity Gain Plans and draft Habitat Management and Monitoring Plans are required at the application stage, with final versions to be secured and approved via pre-commencement conditions.

1.20 Policy GB7(H)(iv) currently requires applicants to refer to the Hounslow Nature Recovery Action Plan (NRAP) when assessing the strategic significance of habitat types until the London Local Nature Recovery Strategy (LNRS) is adopted. As the NRAP is not a statutory document under the Environment Act 2021, it should be addressed under a separate limb of Policy GB7.

⁴ NPPF Paragraph 187(d) and 192(b)

⁵ Paragraph 9 of Schedule 7A of TACP 1990

⁶ PPG (Biodiversity Net Gain) (Paragraph: 015 Reference ID: 74-015-20240214)

1.21 As required by the Environment Act 2021, the London Local Nature Recovery Strategy (LNRS), being prepared by the GLA will form the legally recognised basis for determining strategic significance within the statutory biodiversity net gain metric. The GLA has indicated that a final draft of the LNRS is expected in early 2026, and it is likely to be adopted prior to, or shortly after, the Hounslow Local Plan comes into effect.

1.22 The Council's approach is therefore in conflict with the Framework⁷ which states that local authorities "*should only request supporting information that is relevant, necessary and material to the application*" and "*should be kept to a minimum*". Policy GB7 should therefore be amended to make clear that reliance on the NRAP is transitional only, in order to avoid inconsistency with the statutory BNG framework once the LNRS is adopted.

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

1.23 The Framework states that opportunities to improve biodiversity should be "*integrated as part of their design, especially where this can secure measurable net gains for biodiversity*"⁸

1.24 While St James supports the principle of integrating biodiversity enhancement as part of the design process, the blanket requirement for ecological plans and strategies to be submitted for every major planning application is disproportionate and risks duplicating information already required through the statutory BNG process and the Council's existing Local Validation Checklist. The latter already requires the submission of a "*nature conservation and ecological assessment*" for sites located within, or adjacent to, nature conservation areas, or where protected species may reasonably be affected by the proposed development.

1.25 Accordingly, Policy GB7(K) should be revised to introduce appropriate flexibility, making clear that ecological plans will only be required where significant ecological impacts are identified, or where such plans are necessary to demonstrate how nature recovery priorities have informed the design evolution and associated mitigation.

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?

1.26 The Written Ministerial Statement *Planning: Local Energy Efficiency Standards (EEWMS)*, issued on 13 December 2023, is explicit that any local energy policies which exceed current or forthcoming Building Regulations must be supported by a "*well-reasoned and robustly costed rationale*". Such justification must demonstrate that development remains viable and that housing delivery and affordability are not undermined, in accordance with the Framework.

1.27 The Whole Plan Viability Assessment (WPVA) (July 2024) (EBV1) records that, drawing on the commissioned research contained in the Delivering Net Zero Report (EBEQ5), the additional capital costs associated with achieving net zero carbon are estimated to fall within the following ranges: 4–5% for houses; 4–7% for low-rise flats; and 3–5% for mid-rise flats. Notably, the assessment provides no consideration of high-rise flatted development.

⁷ NPPF Paragraph 45

⁸ NPPF Paragraph 193(d)

1.28 For non-residential development, EBV1 forecasts additional capital (construction) cost uplifts of between 1–4% for offices and 4–7% for industrial floorspace.

1.29 Paragraph 4.17 of EBV1 models two viability scenarios incorporating the net zero carbon and BREEAM requirements advanced through Policies EQ1 and EQ2.

1.29.1 Scenario 1 (Table 6.35.1) shows a 3% cost uplift, which results in a 15% reduction in residual land values.

1.29.2 Scenario 2 (Table 6.35.2) shows a 5% cost uplift and results in a 26% reduction in residual land values.

1.30 Paragraph 6.35 of EBV1 acknowledges the implications of these cost uplifts, stating:

6.35 - Where schemes are on the margins of viability, and developers are unable to pass back the cost of NZC to landowners through a lower land price, it is possible that developers will seek to offset the additional cost by reducing the provision of affordable housing. However, the costs of achieving net zero carbon are expected to fall over time as technologies evolve and improve

1.31 It is important to emphasise that the assumption at paragraph 6.35, that technology costs will fall over time, is highly uncertain. EBV1 provides no clear trajectory or robust evidence base to substantiate such an expectation.

1.32 The Council is additionally proposing a carbon-offset rate of £370/tCO₂ for major development under limb F(i) of Policy EQ1. This represents a very substantial uplift compared with the London Plan benchmark of £95/tCO₂.

1.33 Paragraph 9.6 of the Local Plan provides justification for the higher offset rate; however, the WPVA does not corroborate this position.

9.6 The Council has also increased the carbon offset price for major developments to better reflect the cost of reducing carbon elsewhere through carbon reduction projects funded through the Hounslow Carbon Offset Fund. This is also in line with the findings of the Delivering Net Zero Carbon Study (2023) which suggests that the current London Plan price of £95/tCO₂ (based on the non-traded cost of carbon) is not sufficient to fund equivalent carbon savings elsewhere. The higher rate of £370/tCO₂ is instead based on an indicative cost for retrofitting social housing/public buildings, plus a 10% additional rate for administration and management. The lower rate of £95/tCO₂ is retained for minor development to ensure smaller development schemes remain viable while also contributing to the vital work of reducing emissions associated with development.

1.34 In applying the increase carbon off-set rate at £370/tCO₂, EBV1 states that this would result in reduction of residual land values by c.38%, and as shown in Table 6.37.1 this will result in a large proportion of tested schemes becoming unviable.

1.35 Such a substantial increase is unjustified in viability terms and would inevitably push schemes that are marginally viable at the £95/tCO₂ into viability deficit.

- 1.36 As recognised in paragraph 6.38 of EBV1, this outcome would either require a reduction in affordable housing provision to offset the additional costs or would prevent schemes already facing challenging viability circumstances from coming forward. Neither outcome is favourable and both risk undermining the Plan's ability to be considered as positively prepared and deliverable⁹.

6.38 - The impact of increased carbon offsetting payments on the residual land values ranges from an average reduction of 10.19% (assuming £170 per tonne) to an average reduction of 38% (assuming £370 per tonne) and 65.14% (assuming £570 per tonne). The latter is clearly a significant reduction that may not always be possible for developers to pass on to landowners through reduced land offers. In these cases, developers may opt not to use the affordable housing 'Fast Track' route and opt to use the 'viability tested' route to offset the higher costs of offsetting against affordable housing. The summary table below shows the change in viable/unviable scenarios as the carbon offset payment increases.

- 1.37 These outcomes risk materially undermining the deliverability of the Plan. As highlighted at paragraph 3.3 of EBV1, *"the Residual Land Value is normally a key variable in determining whether a scheme will proceed"*. The carbon-offset proposal alone presents a substantial question over the Plan's effectiveness and *soundness*.

Q5: 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:

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)?

- 1.38 The Framework¹⁰ states that other statements of government policy may be material when preparing plans or deciding applications, such as relevant Written Ministerial Statements.
- 1.39 The EEWMS is explicit in stating that plan-makers are not expected to introduce *"local energy efficiency standards for buildings that go beyond current or planned Building Regulations"* and that policies seeking to do so *"should be rejected at examination"* unless they are *"well-reasoned and robustly costed rationale"*, ensuring that *"development remains viable and the impact on housing supply and affordability"*.
- 1.40 Table EQ2.1 of Policy EQ2 (Sustainable Design and Construction) expects developments to incorporate established sustainable design and construction as set out in the London Plan 2021.
- 1.41 Limb E (I) identifies that major residential developments should achieve a benchmark on-site improvement of 65% Part L 2021. This is inconsistent with LP2021 SI2 which only requires a minimum of 35% on-site reduction beyond Building Regulations Part L.

⁹ NPPF Paragraph 16(b)

¹⁰ NPPF Paragraph 6

- 1.42 Draft Policy EQ2 therefore significantly exceeds the minimum on-site requirement.
- 1.43 In respect of Policy EQ2 and Table EQ2.1, the draft wording must be revised to exclude temporary buildings required to facilitate development or as a meanwhile use from being subject to the sustainability standards otherwise applied for new build and refurbishment development.