



Examination of the Hounslow Local Plan
Matter 8: Design, Tall Buildings and Heritage
Historic England, Hearing Statement
December 2025

Historic England is the principal Government adviser on the historic environment, advising it on planning and listed building consent applications, appeals and other matters generally affecting the historic environment. Historic England is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice.

The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft Local Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development.

1 Introduction

- 1.1. This statement addresses the Inspector's questions with regard to Matter 8 of the Hounslow Local Plan Examination: Matters, Issues and Questions.
- 1.2. This hearing statement should be read alongside Historic England's comments submitted during the Regulation 19 consultation on the Local Plan, along with our [Statement of Common Ground](#) (SoCG) with London Borough of Hounslow, dated 08/12/2025.

2 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?

Question:

1) 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:

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?

Policy CC1

- 2.1. In Historic England's response to the Regulation 19 Draft Local Plan consultation, we queried whether CC1 Part E, which refers to 'optimising redevelopment opportunities' is consistent with the London Plan design-led approach, which seeks to optimise site capacity while responding to character and distinctiveness.
- 2.2. To address this issue, we suggest the following **modification to Policy CC1 E**. This is additional to an agreed proposed modification contained in our [SoCG](#) with the Council:

"E. Optimising site capacity redevelopment opportunities, whilst responding to context, character and local distinctiveness, and respecting conserving and enhancing the area's distinctive character and historic environment including designated and non-designated heritage assets and their setting; and"

- 2.3. In relation to CC1 F, in our response to the Regulation 19 Draft Local Plan we identified that the historic environment evidence base is integral to the evidence base on context and character and should therefore be referred to alongside it. In our [SoCG](#) (p15, HE12) with the Council we have agreed the following **proposed modification to CC1 F** to address this, which also helps to demonstrate compliance with London Plan Policy HC1a:

“CC1 F. Monitoring and updating the historic environment evidence base, Hounslow Characterisation and Growth Study and Character, Sustainability and Design Codes SPD.”

- 2.4. We have also agreed a **proposed modification to CC1.G.IV** ([SoCG](#), p15 HE13) to improve its consistency with the NPPF and reflect the fact that understanding the historic environment relates to a broader evidence base than that mentioned.

“CC1 G IV) Make best use of redevelopment opportunities whilst respecting conserving and enhancing the significance of the area’s historic environment and respecting the area’s distinctive character and historic environment as set out in the Hounslow Characterisation and Growth Study and Character, Sustainability and Design Codes SPD, or any subsequent update.”

- 2.5. Finally, we highlighted that Policy CCI G lacks a reference to the importance of views as an aspect of context and character that contributes to our sense of place, way finding and the understanding and appreciation of heritage assets. To address this we have agreed a **proposed modification to CC1 G II** ([SoCG](#), p15 HE14) with Hounslow Council, as follows:

“CC1 G II Understand and respond to the wider context and history of the area, the needs, culture and aesthetic experience of local and future communities, the townscape setting of the site, strategic and local views, its natural landscape, its sense of place, and its urban structure, built form and function.”

Policy CC2

- 2.6. For Policy CC2, in order to ensure that this is consistent with national policy we have agreed a **proposed modification to CC2 E** as follows:

“... to deliver liveable and connected places with their own strong characters and identities, which ~~are sympathetic to~~ conserve and take opportunities to enhance the area’s existing heritage and character.”

2) 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?

- 2.7. In Historic England's response to the Regulation 19 Draft Local Plan consultation, we raised significant concerns about Policy CC3. While we appreciate that efforts have been made to implement the requirements of London Plan D9B, we consider that much greater clarity is needed about which locations are considered to 'have potential for tall buildings' under part K and parts A-E.
- 2.8. Through Duty to Cooperate discussions with Hounslow Council we have agreed a significant number of **proposed modifications to CC3**, some of which are interrelated. These proposed modifications and the issues that they seek to address can be found in our [SoCG](#) with Hounslow Council from p15 (HE16) to p21 (HE30). These include approaches to resolving the following issues:
- (i) As figure CC3.1 does not identify areas with potential for tall buildings (but rather the areas covered by two different tall building definitions), part K needs to be corrected and a new map inserted. Otherwise, the map incorrectly suggests that tall buildings are appropriate across much of the borough. (see also our response to question d below).
 - (ii) Part F needs to be clarified, particularly in relation to those places where buildings of 4-6 storey may be appropriate and to highlight that in such cases a proportionate approach would be needed to Heritage Impact Assessment. (see SoCG HE18 and HE19, p17).
- 2.9. A key outstanding area of concern relates to the presentation of building heights as either "maximum" or "appropriate". We understand that through Duty to Cooperate discussions with the Greater London Authority, Hounslow Council has proposed a modification to table CC3.2 to present the maximum heights instead as "appropriate heights". We do not consider this an suitable response to the evidence base as the heights given are generally considered to be at the upper end of a potentially appropriate range, subject to further assessments.
- 2.10. For example, on the *Tall Building Opportunity* maps in the [Tall Building Study 2024](#) (EBCC3) from p277, the "Appropriate Areas" are shaded, with storey heights given as e.g. "up to 14 storeys". In associated tables of Tall Building

Recommendations, heights are given as e.g. “up to 45m / 14 storey (52m AOD)” along with any recommendations about locations of specific heights within a cluster (see e.g. CH1 Sainsbury’s site, p256). These are areas with “potential” for building heights *up to* those shown, subject to detailed site-specific assessments.

- 2.11. In the separate evidence base provided by the [Great West Corridor Views Appendix](#) (EBCC4a), heights are tested against key views and potential impacts, and are again subject to more detailed assessment of proposals. The Views Assessment states that:

“This study provides guidance to both developers and the council, of the locations and heights of taller buildings that may potentially be appropriate in the corridor... This study aims to identify locations where a measured approach to significant development could be considered without causing substantial harm or significant less than substantial harm to historic places or buildings and their setting... In the case of the Kew Gardens World Heritage Site, the aim of the masterplan is to avoid causing any additional harm... In some cases, previous planning decisions (for example the Brentford Football Club development) have caused harm to the setting of adjacent conservation areas through excessive height of new development.” (p30)

- 2.12. The [GWC Masterplan](#) itself (p150) states that “Tall building proposals in identified locations would not normally be expected to be higher than the appropriate height”, while the tables containing guidance on specific tall buildings (e.g. 7.1, p157) include statements such as “approximately 18 storeys, not exceeding 70m AOD”. Modelled heights can therefore be taken to be at the upper end of the height that is potentially appropriate. It should be noted that the Masterplan generally promotes *Mid-rise* buildings, with distinct taller ‘focal buildings’.
- 2.13. With the aim of resolving this issue, and reflecting the outstanding issues in our [SoCG](#) with Hounslow Council (p44-45), we suggest that **Policy CC3 part L is modified** as follows:

“L. Not exceed the maximum appropriate building heights for that site or area (subject to site-specific impact assessments), as set out in Table CC 3.2.”

Accordingly, the **title of Table CC3.2** would be amended to say:

“Maximum ~~permissible~~ appropriate building height” (or otherwise “indicative maximum” may be used)

With the sub-heading being amended to say:

“Maximum Appropriate Building Height”

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?

- 2.14. In Historic England's response to the Regulation 19 Local Plan consultation, we queried how the two definitions would be applied, identifying possible inconsistencies between the heights given for individual tall building sites and the threshold to be applied for the wider area. There is also some ambiguity about the handling of proposals for 6-10 storeys in and around the higher scale areas, as these would not appear to be covered by either Part K or Part F of the policy?
- 2.15. This issue is contained in the Table of Outstanding Matters in our [SoCG](#) with Hounslow Council (HE20, p42), which also records the response to this issue of Hounslow Council.
- 2.16. Should there be a need to resolve any of these issues through a single tall building definition, then we recommend that preference be given to the lower scale definition to ensure that potentially harmful schemes are not excluded from the full policy assessment afforded by CC3.

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?

- 2.17. Please refer to our response to question 2(b) above.

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

- 2.18. In line with our response to question 2(a) above, figure CC3.1 does not identify areas with potential for tall buildings. Part K therefore needs to be corrected and a new figure should be inserted to accompany CC3.1.
- 2.19. **Proposed modifications to CC3 K and associated figures** are presented in our [SoCG](#) with Hounslow Council on p17-18 (HE22) and p20 (HE27-28).
- 2.20. Historic England reserves its position on these modifications pending production of a map that appropriately translates the tall/focal buildings associated with mid-rise clusters in the GWC Masterplan and the 'Appropriate Areas' identified in the Tall Building Study, to show 'potential areas for tall buildings' as expressed in policy CC3 K.

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?

2.21. In our response to the Regulation 19 Draft Local Plan, Historic England raised concerns about potential harm to heritage assets as a result of tall building proposals, the associated evidence base and conformity with the NPPF and London Plan. We have agreed a number of modifications with Hounslow Council which go some way to addressing this issue. However, we would stress that the requested modification to Part L referred to in our response to question 2(a) above, along with the modification of part K referred to in our response to question 2(d) and associated preparation of satisfactory maps, remain critical to ensuring the plan is sound.

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?

2.22. In our response to the Regulation 19 Draft Local Plan we queried a number of aspects of Policy CC3 part N. Most critically, part NX is not considered to be clear or in conformity with the NPPF.

2.23. To address this issue and ensure that the plan is sound we have agreed a **proposed modification to Policy CC3 NX** in our [SoCG](#) with Hounslow Council (HE25, p19) which is as follows:

“CC3 N) X. Clearly demonstrate through appropriate townscape analysis, and verified views and, where appropriate heritage impact assessment, how proposals;

- *Conserve and enhance the townscape,*
- *Conserve and enhance the significance setting of surrounding heritage assets, including any contribution made by their settings*
- *Respect and local landmarks and positively contribute to the overall skyline and views and protect short, mid and long range views in addition to significant linear and panoramic views and the setting of the Thames;”*

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?

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?

2.24. Historic England considers that part O along with associated references to local, district and metropolitan scale tall buildings and their relationship with the general policy approach are ambiguous. To simplify and clarify the approach, through the Duty to Cooperate process with Hounslow Council we have agreed **proposed modifications to Policy CC3O and paragraph 6.15** which are set out in our [SoCG](#) (HE26, p19). In essence, this involves removal of the reference to local, district and metropolitan scale buildings and associated definitions.

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?

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?

2.25. Historic England has raised concerns about the extent to which Policy CC3 and associated site allocations respond to heritage considerations. Our stated preference was for the plan to be accompanied by heritage impact assessments to consider the significance of the historic environment and potential impacts on it.

2.26. In the absence of HIAs, our [SoCG](#) with Hounslow Council includes proposed modifications to Policy CC3 which include amendments to parts A, B, C, D, NX, O and supporting text, as well as associated changes to Policy CC4 (below) and site allocations,. An important clarification is the need for site specific heritage impact assessment in appropriate circumstances. The modifications are too numerous to include in this Hearing Statement and we therefore request that the Inspectors refer to the content of the [SoCG](#) and the Council's up-to-date schedule of proposed modifications when available.

2.27. The SoCG summarises outstanding issues, some of which are addressed above, and of which a key outstanding issue is the inclusion within site allocation policies of references to the key heritage assets that may be impacted by specific proposals. We will elaborate on this as appropriate in our Hearing Statements for specific sites.

3) 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?

2.28. While Historic England welcomes the inclusion of a detailed heritage policy in the plan, we have raised a number of issues relating to its clarity and conformity with the NPPF. Through Duty to Cooperate discussions with the Council this has resulted in a range of **proposed modifications to Policy CC4 and supporting text** to ensure that the plan is sound and represents a positive strategy for the conservation and enhancement of the historic environment. These are contained in our [SoCG](#) with Hounslow Council, generally on pages 21-34, with associated changes to other policies and site allocations. These include proposed changes relating to:

- Proposals affecting heritage assets (CC4 F and K)
- The significance of heritage assets (a wide range of adjustments throughout the plan, including CC4 K and M)
- Substantial or less than substantial harm (CC4 M and N)
- Heritage at risk (see response to 3(h) below)
- Sites of archaeological importance (CC4 Z, new clause CC4 AB, CC4 X, CC4 BB and supporting text relating to Archaeological Priority Areas)
- Kew Gardens World Heritage Site (CC4 W and supporting text including 6.19-6.22)

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?

2.29. The primary source of information on designated and non-designated heritage assets in London is the Greater London Historic Environment Record. To ensure that this is clear, we have agreed **proposed modifications to Policy CC4** with Hounslow Council including changes to Parts S and Z (see our [SoCG](#), HE43, HE51, p25).

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?

2.30. Please see our response to question 3(a) above.

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)?

2.31. Please see our response to question 3(a) above.

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?

2.32. To better align with the NPPF when considering designated and non-designated heritage assets, we have agreed the following **proposed modification to CC3 K** (see our [SoCG](#), HE38, p22-23)

“K. Conserve the significance of heritage assets, giving great weight (and the more important the asset, the greater the weight should be) to a designated heritage asset’s conservation and balanced weight to the conservation of a non-designated heritage asset...”

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?

2.33. To clarify the approaches to Parks and Gardens contained in Policy CC4, Historic England has agreed **proposed modifications to CC4 DD** in our [SoCG](#) with Hounslow Council (HE54, p28-29) as follows:

~~“REGISTERED HISTORIC PARKS AND GARDENS~~
CC4.DD Where appropriate, non-designated historic parks and gardens should be assessed for registration or local listing. Consider adding to the list and encouraging preConservation and enhancement of historic parks and gardens through appropriate management measures will be encouraged.”

2.34. We have also agreed an adjustment to the title of part EE from “Listed Buildings at Risk” to “Heritage at Risk” as this database extends to a range of assets. In response to the Inspectors’ question, part EE could helpfully be preceded with the text “The Council will...”.

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

2.35. Enabling development is development that would not normally be in compliance with local and/or national policies, and would not normally be given planning permission, except for the fact that a future conservation of a heritage asset. Consequently, if a reference to enabling development is to be retained in the plan then we consider it important it is clear this should be a last resort. We have therefore agreed a **proposed modification to CC4 F** with Hounslow Council ([SoCG](#), HE35, p21):

“F. Bring heritage assets back into meaningful use consistent with their conservation, where they have been left empty, abandoned or underused, ~~including~~ This may include using enabling development where appropriate as a last resort ~~and consistent with their conservation.~~”