

HOUNSLOW LOCAL PLAN EXAMINATION STAGE 1 HEARING SESSIONS IDENTIFIED BY THE INSPECTORS

ON BEHALF OF SEGRO (RESPONDENT 098, 099) – MATTER 1 LEGAL COMPLIANCE AND THE DUTY TO CO-OPERATE

Preamble

SEGRO has a number of existing and proposed employment sites in the Borough. SEGRO refer to their previous responses, including appendices, to the Hounslow Local Plan 2020-2041 (Proposed Submission Version) in October 2024. These responses together with their commentary on affordable workspace set out the land interests, background and context to SEGRO's interest in the Hounslow Local Plan. This also includes requested changes to the Local Plan.

SEGRO welcome the opportunity to continue their involvement in the preparation of the Hounslow Local Plan and to participate in the forthcoming Stage 1 hearings.

Question 19 - Has the Council engaged constructively, actively and on an ongoing basis with all relevant organisations on strategic matters of relevance, including in terms of housing, employment and infrastructure provision, as required by the DtC and to maximise the effectiveness of the preparation of the Plan?

1. We note the Written Ministerial Statement of 27th November 2025.
2. SEGRO are satisfied that the Council have engaged constructively with relevant organisations in respect of delivering employment growth over the Plan period.
3. Policy SD2 of the London Plan 2021 which advises that the Mayor will work with partners across the Wider South East (WSE) to address appropriate regional and sub-regional challenges and opportunities. To secure an effective and consistent strategic understanding of the demographic, economic, environmental and transport issues facing the WSE, the Mayor supports joint working with WSE Partners to ensure that plan-making is, as far as possible, informed by up-to-date consistent technical evidence and monitoring.
4. With this in mind, it is noted that the Duty to Cooperate Compliance Statement confirms how the Council has worked with prescribed bodies, neighbouring boroughs and other members of relevant statutory partnerships to identify and address strategic cross-boundary matters. These relevant Statements of Common Ground include with the GLA and LH Hounslow's neighbours.

5. On that basis, it is considered that the Council has met the legal duty to engage constructively, actively and an ongoing basis to maximise the effectiveness of the emerging Local Plans as required by the PPG.
6. We note and make the observation, LB Hounslow have engaged and on an ongoing basis, and does not have any spare employment floorspace capacity to assist its' neighbours in meeting their unmet needs. We also note none of their neighbours can accommodate the employment needs of LB Hounslow.

Question 20 - Are there any inter-relationships with other authorities in terms of housing markets, economic activity, travel to work areas and the market for employment land and premises, which have not been specifically addressed?

7. No. It is considered that the Council has appropriately engaged with all relevant authorities in respect of the market for employment land and premises.
8. The market for logistics floorspace in Hounslow is examined in the context of the Park Royal / A40 / Heathrow property market area (the PMA), as defined by the evidence base to the London Plan 2021. The PMA covers the local authority areas of Barnet, Hammersmith and Fulham, Brent, Richmond upon Thames, Ealing, Harrow, Hillingdon and Hounslow. The spatial footprint of the PMA is conterminous with the London Plan's West sub region, with the addition of Barnet to the north and Richmond upon Thames to the south.
9. We refer to the signed Statements of Common as confirmation of this.

Question 22 – In overall terms, is the Plan in general conformity with the spatial development strategy for London (i.e. the London Plan)?

10. SEGRO consider the Hounslow Local Plan to be consistent with the spatial development strategy contained within the London Plan 2021.
11. Chapter 2 of the London Plan 2021 establishes the strategic framework for those parts of London that will see significant development over the lifetime of the Plan. At paragraph 2.0.4, the London Plan 2021 confirms the areas that will see the most significant change are identified as Opportunity Areas. Opportunity Areas are seen to have the potential to deliver a substantial amount of new homes and jobs that London needs.

12. Heathrow Airport alongside the adjoining Land at Hatton Fields (Policy P2 (c) is contained within the 'Heathrow/Elizabeth Line West' Opportunity Area. As set out in paragraph 2.1.64 of the London Plan 2021, the Heathrow/Elizabeth Line West Opportunity Area will contain "a range of opportunities to support London's economic development".
13. Paragraph 2.1.65 goes on to state that the Mayor will review and clarify the area's potential contribution to London's growth when expansion proposals for Heathrow Airport and their spatial and environmental implications are clearer. This will include reviewing the housing and jobs targets for opportunity areas and working with boroughs to support more detailed plans, such as through Opportunity Area Planning Frameworks or "Local Plans."
14. It is important to note at this stage that the Hounslow Local Plan is clear in its approach that the requirements for employment floorspace are driven by a 'two runway' scenario – i.e. the emerging Local Plan is not looking to accommodate economic need to support expansion of a third runway at Heathrow Airport.
15. As such, it is considered that the Hounslow Local Plan is wholly consistent with the London Plan 2021 in respect of allocating and focusing employment growth towards the Land at Hatton Fields (draft Policy P2 (c)). Indeed, economic growth within this location is a clear aspiration of the London Plan 2021 through its allocation as an Opportunity Area. Moreover, the London Plan 2021 states that emerging Local Plans provide an appropriate mechanism for the delivery of growth within the 'Heathrow/Elizabeth Line West' Opportunity Area.