

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

ON BEHALF OF SEGRO (RESPONDENT 098, 099) – MATTER 8 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:

- 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?**
- 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?**
- 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?**
 1. SEGRO is generally supportive of Policies CC1 and CC2.
 2. SEGRO will engage in LB Hounslow's pre-application advice service to inform a development proposal. This will sit alongside the context of the site and its surroundings, technical surveys and assessments and masterplanning exercise, together with other policy considerations contained in the Local Plan, the London Plan and national policy, including NPPF. We consider the Policy expectation for development proposals to achieve is ‘high’ in the context of Policy CC1. There is a practical application of these policies at the Development Management stage, but as the Inspectors have highlighted in their Question 1 a), we do not consider all development proposals can be expected to conserve and take opportunities to enhance (see G III, IV and V, for example).
 3. The London Plan Policies D1 to D6 would be a consideration in any case. We consider the historic environment considerations in Policy CC1 could be drawn out and made clearer or dealt with elsewhere in the Local Plan.

4. The individual and cumulative requirements of development proposals in Policies CC1 and CC2 generally reflect the design-led approach in the London Plan Policy D3. The policy requirements are lengthy, especially at Policy CC2, and there is a practical question around whether a development proposal can accord with all the criteria set out; recognising a number are related to the proposed use.
5. of the role and weight to be attached to the Supplementary Planning Documents referred to in the context of the application of these policies (and elsewhere in the Local Plan) would be welcomed. Updates to and new Supplementary Planning Documents should continue to be consulted on, and amendments made where appropriate.