

Hounslow Local Plan (2020-2041)

Examination

Stage 1 Hearings Note

Previous Engagement Under the Duty to Cooperate

February 2026



**London Borough
of Hounslow**

Contents

1.0 Introduction	3
2.0 Summary of Previous DtC Engagement	4
3.0 Appendices	15
• Appendix 1: Joint Statement of Common Ground (September 2020)	
• Appendix 2: Statement of Common Ground between London Borough of Hounslow and London Borough of Hillingdon (December 2020)	
• Appendix 3: Letter 'Updated Response - Local Plan Review Consultation (Regulation 19) - West of Borough Plan and Site Allocations' (19 th August 2020)	
• Appendix 4: Statement Of Common Ground between LB Hounslow, Royal Botanic Gardens, Kew and LB Richmond upon Thames (December 2020)	
• Appendix 5: Statement of Common Ground Between London Borough of Hounslow and The Mayor of London (Greater London Authority) (May 2021)	
• Appendix 6: Statement of Common Ground between London Borough of Hounslow and Surrey County Council (May 2021)	

1. Introduction

1.1. During the Matter 1 hearing session on 10th January 2026, the Inspectors requested that the Council produces a Note to summarise the engagement undertaken as part of the duty to cooperate (DtC) in relation to the Local Plan Review into the since withdrawn Volume 2: Site Allocations (**Document ORD8**¹), Volume 3: West of Borough (**Document ORD8a**²), and Volume 4: Great West Corridor (**Document ORD8c**³), development plan documents (DPDs). The details of the tasks undertaken in this Note are set out in Documents Requested by Inspectors in Hearings Week 1 2026 February Update (**Document EX30a**⁴) as follows:

- Details of historical duty to cooperate undertaken for previous iterations of the Plan.

1.2. This Note includes a brief timeline and an overview of the positions on strategic matters agreed with neighbouring boroughs through any pre-existing statements of common ground in order to provide additional context to support the examination of the Hounslow Local Plan 2020-2041 (**Document S1**).

1.3. This Note does not include summaries of historical duty to cooperate engagement undertaken with any of the ‘prescribed bodies’ to support the production of the previous local plan review DPDs (**Documents ORD8, ORD8a, and ORD8c**). The focus is instead upon historical engagement to reach positions on strategic cross-boundary matters with neighbouring authorities and the Mayor of London, and as such the Note helps to outline the historical context for engagement with these parties. As the previously agreed SoCGs with prescribed bodies largely centred around the soundness of specific policies in the previous Plan documents and not strategic cross-boundary matters, these have not been included here. However, any relevant previous SoCG with prescribed bodies can be provided to the Inspectors if this would assist the examination⁵.

¹ ORD8 [Hounslow Local Plan Review Volume 2: Site Allocations](#)

² ORD8a [Hounslow Local Plan Review Volume 3: West of Borough Plan \(Submission Version\)](#)

³ ORD8c [Hounslow Local Plan Review Volume 4: Great West Corridor Plan \(Submission Version\)](#)

⁴ EX30a – [Documents Requested by Inspectors in Hearings Week 1 Update \(February 2026\)](#)

⁵ For a further explanation of the engagement undertaken with prescribed bodies during the preparation of the current Plan under examination (Document S1), please see Document S10 [Duty to Cooperate Statement](#), as well as SoCGs under the following references: S10a, EX5a, EX5b, and EX5h.

1.4. For reference, the Note also provides the relevant previously agreed SoCGs with neighbouring authorities and the Mayor of London from this time as appendices.

2. Summary of Previous DtC Engagement

2.1. To support the preparation of the previous Local Plan review DPDs (**Documents ORD8, ORD8a, and ORD8c**), the Council entered into a number of SoCGs with neighbouring authorities and the Mayor of London in order to demonstrate joint working on a number of cross-boundary strategic matters. These SoCG are summarised in the table provided overleaf.

Name of SoCG	Date signed	Parties to agreement	Strategic matters covered	LBH Comments
Joint Statement of Common Ground	3 rd September 2020	<ul style="list-style-type: none"> • London Borough of Hounslow • Spelthorne Borough Council • London Borough of Ealing • London Borough of Hammersmith and Fulham • London Borough of Richmond upon Thames • Slough Borough Council • Runnymede Borough Council • London Borough of Brent 	<p>A. Housing needs (including Gypsies, Travellers and Travelling Show People);</p> <p>B. Employment needs;</p> <p>C. Retail;</p> <p>D. Green Belt and Environmental Matters;</p> <p>E. Infrastructure (including transport, community and green infrastructure);</p> <p>F. Conservation and enhancement of the natural, built and historic environment</p>	<p>The Joint SoCG (see Appendix 1) was intended to act as a single SoCG with multiple parties as recommended by planning practice guidance. As discussions progressed, it became clear that not all parties were willing to sign up to a single SoCG and so more than one SoCG was progressed (see below for further details).</p> <p>The Joint SoCG included all local authorities, excluding LB Hillingdon and Surrey CC, who sought to pursue bilateral SoCGs as detailed below, as well as TfL who signed up to positions relating specifically to transport infrastructure.</p>

Name of SoCG	Date signed	Parties to agreement	Strategic matters covered	LBH Comments
		<ul style="list-style-type: none"> • London Borough of Barnet • London Borough of Harrow • Old Oak and Park Royal Development Corporation (OPDC) • Transport for London (TfL) 		<p>Positions were agreed on strategic matters relating to: Housing needs (including Gypsies, Travellers and Travelling Show People)(Appendix 1 section 4.1.1); Employment needs (section 4.1.2); Retail (section 4.1.3); Green Belt and Environmental Matters (section 4.1.4); Infrastructure (including transport, community and green infrastructure) (section 4.1.5); and Conservation and enhancement of the natural, built and historic environment (section 4.1.6).</p>
Statement of Common Ground between	4 th December 2020	<ul style="list-style-type: none"> • London Borough of Hounslow • London Borough of Hillingdon 	<ol style="list-style-type: none"> 1. Green Belt 2. Heathrow Opportunity Area employment demand implications 	<p>Positions were agreed in relation to: Green Belt to ensure that, in the event of proposed green belt release being found sound, opportunities will</p>

Name of SoCG	Date signed	Parties to agreement	Strategic matters covered	LBH Comments
London Borough of Hounslow and London Borough of Hillingdon			3. Heathrow Opportunity Area housing need and capacity 4. Gypsies, Travellers and Travelling Show People	<p>be sought to maintain strong green belt boundaries; the extent of the Heathrow Opportunity Area (OA) boundary; the fact that LB Hillingdon does not have any assessed spare capacity to meet any potential unmet employment or housing need that may arise in LB Hounslow, in respect of evidence base findings and the Heathrow OA indicative capacities; and the positions pertaining to meeting Gypsy, Traveller and Travelling Showpeople accommodation needs for both authorities. For more information, please see Appendix 2.</p> <p>N.B. LB Hillingdon also requested that a letter entitled 'Updated Response - Local Plan Review</p>

Name of SoCG	Date signed	Parties to agreement	Strategic matters covered	LBH Comments
				Consultation (Regulation 19) - West of Borough Plan and Site Allocations' (dated 19th August 2020) should be appended to the SoCG, reflecting areas of remaining objection from LB Hillingdon. This is provided at Appendix 3.
Statement of Common Ground between LB Hounslow and Royal Botanic Gardens, Kew and LB Richmond upon Thames	14 th December 2020	<ul style="list-style-type: none"> • London Borough of Hounslow • London Borough of Richmond upon Thames • Royal Botanic Gardens, Kew 	Strategic matters covered in relation to Design and Heritage, specifically the location, design and height of proposed developments in the GWC area. Areas of agreement and disagreement were recorded in relation to the Great West Corridor (GWC) Masterplan and Capacity Study (2020), GWC Masterplan and Capacity Study – Appendix Views Testing (2020), and how these informed the policies in the Draft Great West Corridor Local Plan Review (Volume 4 DPD) and	The statement sets out positions on matters which the parties agreed to at the time, including certain amendments to the evidence base and modifications to the design and heritage policy in the Vol.4 GWC DPD for clarity. The statement also set out positions on matters of outstanding concern relating to the GWC Place policy and Design & Heritage policy, as well as areas of disagreement in

Name of SoCG	Date signed	Parties to agreement	Strategic matters covered	LBH Comments
			some of the development proposals in the Draft Hounslow Site Allocations (Volume 2 DPD).	relation to the GWC Masterplan and Capacity Study and its appendices. For more information, please see Appendix 4.
Statement of Common Ground between London Borough of Hounslow and The Mayor (Greater London Authority)	25 th May 2021	<ul style="list-style-type: none"> • London Borough of Hounslow • The Mayor of London 	<p>Common ground was reached for the following strategic matters (with minor additional modifications agreed in some cases for consideration by the Inspectors):</p> <ul style="list-style-type: none"> • Health & Wellbeing (Policies GWC3 & WoB3) • Design and Heritage (Policies GWC5 & WoB5) • Connecting People & Places (Policies GWC6 & WoB6) <p>The statement acknowledged that several strategic matters were not included in detail as ‘different positions remain at this stage’ (i.e. no common ground had been</p>	<p>The outstanding matters related specifically to areas where the Mayor considered that the strategic approach of the LPR DPDs was not in general conformity with the London Plan. In broad terms, this related to:</p> <ul style="list-style-type: none"> • The Mayor considered that exceptional circumstances had not been demonstrated to justify the release of green belt for housing and employment (industrial and office floorspace);

Name of SoCG	Date signed	Parties to agreement	Strategic matters covered	LBH Comments
			<p>reached), however a summary of the reasons for this lack of agreement were given for the following matters:</p> <ul style="list-style-type: none"> • Employment Growth (Policies GWC1 & WoB1) • Housing Growth (Policies GWC2 & WoB2) • Green Belt, Metropolitan Open Land and Open Space (Policies GWC4 & WoB4) 	<ul style="list-style-type: none"> • Linked to this, the Mayor questioned whether LB Hounslow had properly assessed whether the intensification of existing industrial sites could meet industrial floorspace need, and the intensification of existing business parks and town centre sites could meet office floorspace need, without the need for green belt release; • The Mayor also raised concerns relating to assumptions around the apparent lack of available and viable housing sites in the Site Allocations and Capacity Assessment (2020)

Name of SoCG	Date signed	Parties to agreement	Strategic matters covered	LBH Comments
				<p>(SACA) to allow LB Hounslow to meet the London Plan housing target without needing to release green belt sites for housing; and</p> <ul style="list-style-type: none"> • The Mayor questioned the proposed re-designation of certain green belt land as Metropolitan Open Land (MOL). <p>Beyond these outstanding matters, both parties were able to agree modifications to bring the other LPR DPD policies into general conformity.</p> <p>For more information, please see Appendix 5.</p>
Statement of Common Ground	11 th May 2021	<ul style="list-style-type: none"> • London Borough of Hounslow 	<ul style="list-style-type: none"> • Cross boundary highways impacts • Mitigation beyond the borough boundary 	Surrey CC had raised concerns relating to the potential for cross-boundary highways impacts relating

Name of SoCG	Date signed	Parties to agreement	Strategic matters covered	LBH Comments
<p>between London Borough of Hounslow and Surrey County Council</p>		<ul style="list-style-type: none"> Surrey County Council 	<ul style="list-style-type: none"> On-going cooperation on highways matters 	<p>to the level of growth in the West of Borough DPD area. In particular, further strategic transport modelling was requested, including of the A30 / B378 junction, as well as further evidence of active travel and sustainable transport mitigation measures proposed for the Opportunity Area. LB Hounslow undertook this additional work to inform further engagement around this issue.</p> <p>Both parties were able to agree further modifications to Connecting People & Places policy WoB6, including around ensuring cumulative impact of development and any resulting impacts on the road network of neighbouring</p>

Name of SoCG	Date signed	Parties to agreement	Strategic matters covered	LBH Comments
				<p>authorities will be captured in transport assessments, and additional supporting text to clarify that mitigation measures may also include potential measures beyond the Hounslow borough boundary. For more information, please see Appendix 6.</p>

3. Appendices

London Borough of Hounslow

Draft Site Allocations, Great West Corridor & West of Borough Local Plan Reviews

Joint Statement of Common Ground

Version 7, Date: 03/09/2020

Current local plan review stage: Submission to Secretary of State (Regulation 22)

1. Introduction

1.1. This Statement of Common Ground (SCG) sets out how the Council has ensured that its proposed submission versions of the Local Plan reviews for both the Great West Corridor (GWC) and West of Borough (WoB) Opportunity Areas have been prepared on the basis of effective joint working on strategic cross-boundary matters, in line with both the statutory duty to cooperate, as imposed by Section 110 of the Localism Act which inserted section 33A into the Planning and Compulsory Purchase Act 2004. The SCG outlines: the key strategic matters being addressed by the statement; the plan-making authorities and other bodies responsible for joint working; governance arrangements for the cooperation process; a record of where agreements have (or have not) been reached on key strategic matters; and any additional strategic matters to be addressed by the statement which have not already been addressed.

LB Hounslow Local Plan reviews – The Great West Corridor and West of Borough

1.2. The Hounslow Local Plan was adopted on 15th September 2015. In order to find the Plan sound, the Inspector proposed two main modifications to the submitted plan, adding 2 policies (SV1 and SV2) requiring partial plan reviews to be undertaken in order to plan positively for the strategic scale of growth in two areas: the Great West Corridor area (now an Opportunity Area in the emerging New London Plan) and the West of Borough area (part of the Heathrow Opportunity Area shared with LB Hillingdon). LB Hounslow has since progressed with these local plan reviews and has now undertaken both Regulation 18 and Regulation 19 consultation, with a view to submitting the draft Plans to the Secretary of State in June 2020.

1.3. The SCG has been prepared in accordance with Paragraph 27 of the NPPF (February 2019) in order to demonstrate effective and on-going joint working on strategic cross-boundary matters, and will be maintained in order to document how these matters are being addressed and what progress has been made thus far. The statement has been produced using the approach set out in national planning guidance and will be made publicly available on the Council website alongside the draft submission version of the plan to provide greater transparency. The statement has also been prepared in accordance with best practise

advice as set out in the Planning Advisory Service's 'Statement of Common Ground Advice and Template' (January 2019).

Relationship between this statement and the Duty to Cooperate

- 1.4. The SCG provides a record of how LB Hounslow has engaged with local authorities and prescribed bodies in order to agree specific strategic issues that have arisen in the course of preparing the local plan reviews. Full details of how LB Hounslow has engaged with each of the prescribed bodies identified in Regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012 and section 33A(1)(c) of the PCPA 2004 are detailed in the Duty To Cooperate Statement, to be included as part of the evidence base to support the local plan reviews when these are submitted to the Secretary of State in Summer 2020.
- 1.5. Full details of parties involved in this SCG are listed in section 3.1 below.

2. Statement structure

- 2.1. As per national guidance and best practise advice provided by PAS, this statement includes:
 - A list of parties involved in the SCG;
 - A list of signatories to the statement;
 - The strategic geography covered by the SCG (including map, description and justification);
 - Strategic matters covered and a record of agreement for each, including:
 - A. Housing needs (including Gypsies, Travellers and Travelling Show People);
 - B. Employment needs;
 - C. Retail;
 - D. Green Belt and Environmental Matters;
 - E. Infrastructure (including transport, community and green infrastructure); and
 - F. Conservation and enhancement of the natural, built and historic environment
 - Governance arrangements; and
 - A record of on-going cooperation and a timetable for review

How this SCG relates to other annex SCGs

- 2.2. Whilst LB Hounslow has attempted to detail cooperation in a single statement as per national guidance, it has been appropriate in some instances to prepare separate SCGs with neighbouring boroughs and other parties as the most expedient way to evidence joint working on certain specific issues. Reference will be made to the arrangements detailed in these separate statements within this SCG where appropriate. Full details of the annex SCGs are provided in the Duty to Cooperate Statement, however a provisional list (correct at the time of writing) is provided here for easy reference:

- LB Hounslow and Mayor of London / GLA SCG
- LB Hounslow and Historic England SCG
- LB Hounslow and LB Richmond upon Thames/Royal Botanic Gardens Kew SCG
- LB Hounslow and LB Hillingdon SCG
- LB Hounslow and the Environment Agency (EA) SCG
- LB Hounslow and NHS Hounslow CCG
- LB Hounslow and Highways England SCG
- LB Hounslow-Surrey CC SCG
- LB Brent Local Plan 2020- 2041 SCG
- Heathrow Strategic Planning Group (HSPG) SCG to accompany Joint Spatial Planning Framework (JSPF) preparation
- LB Hounslow and Developer SCGs (various)

3. Statement of Common Ground

3.1 List of Parties involved:

Neighbouring and other authorities:

- Spelthorne Borough Council
- London Borough of Ealing
- London Borough of Hammersmith and Fulham
- London Borough of Richmond upon Thames
- Slough Borough Council
- Runnymede Borough Council
- LB Brent
- LB Barnet
- LB Harrow
- Old Oak and Park Royal Development Corporation (OPDC)

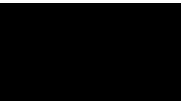
Prescribed Bodies and additional signatories:

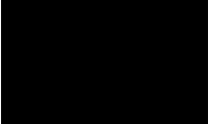
- TfL

3.2 Signatories:

The following table sets out the signatories to this Statement of Common Ground. The column labelled 'Strategic matters...' is intended to allow Parties to indicate which matters each are acting as a signatory to. See section 3.6 for a record of on-going cooperation on strategic matters addressed in this Statement of Common Ground.

Organisation	Name	Position	Signature / date	Agreed positions to which this party is a signatory (section / paragraph no).
LB Hounslow	Peter Matthew	Executive Director, Housing,	 03/09/20	(All positions)

		Planning and Communities		
Spelthorne BC	Cllr. Jim McIlroy	Deputy Leader/ Portfolio Holder Local Plan	 13/08/2020	Housing / GTTS: A1, A2, A3, A4, A5, A6, A7, A8, A9. Employment: B1, B2, B3, B4, B5 Retail: C1, C2 Green Belt & Env.: D1, D2, D3 Infrastructure: E5, E6, E7, E8, E9, E10
LB Ealing	Mr. Steve Barton	Strategic Planning Manager	 18.08.20	Housing / GTTS: A1, A2, A3, A5, A6, A7, A8, A9. Employment: B1, B2, B3, B4, B5 Retail: C1, C2 Green Belt & Env.: D1, D2, D3 Infrastructure: E4, E5, E6, E8, E10
LB Hammersmith and Fulham	Mr. Matt Patterson	Head of Spatial Planning	 03.07.2020	Housing / GTTS: A1, A2, A3, A5, A6, A7, A8, A9. Employment: B1, B2, B3, B5 Retail: C1, C2 Infrastructure: E4, E5, E8, E10
LB Richmond upon Thames	Ms. Jenifer Jackson	Assistant Director – Planning & Transport Strategy	 5 August 2020	Housing / GTTS: A1, A2, A3, A5, A6, A7, A8, A9. Employment: B1, B2, B3, B5 Retail: C1, C2 Green Belt & Env.: D1, D2, D3 Infrastructure: E5, E8, E10 Conservation: F1
Slough BC	Mr. Paul Stimpson	Planning Policy Lead	 06.07.2020	Employment: B1, B2, B3, B4, Retail: C1, C2
Runnymede BC	Cllr. Nick Prescott	Council Leader	 30.07.2020	Employment: B1, B2, B3, B4, B5
LB Brent	Mr. Paul Lewin	Team Leader,		Housing / GTTS: A1, A2, A3, A5, A6, A7, A8, A9.

		Planning Policy	08.07.2020	Employment: B1, B2, B3, B5
LB Harrow	Ms. Beverley Kuchar	Chief Planner	 04.08.2020	Housing / GTTS: A1, A2, A3, A5, A6, A7, A8, A9.
OPDC	Mr. Tom Cardis	Assistant Director of Planning (Interim)	 31.07.2020	Housing / GTTS: A1, A2, A3, A5, A6, A7, A8, A9 Infrastructure: E4
TfL	Ms. Josephine Vos	London Plan Team Manager, TfL City Planning	 01.08.2020	Infrastructure: E1, E2, E3, E4
LB Barnet	Mr. Nick Lynch	Planning Policy Manager	 07.08.2020	Housing / GTTS: A1, A2, A3, A5, A6, A7, A8, A9. Employment: B1, B2, B3, B5

3.3 Strategic Geography

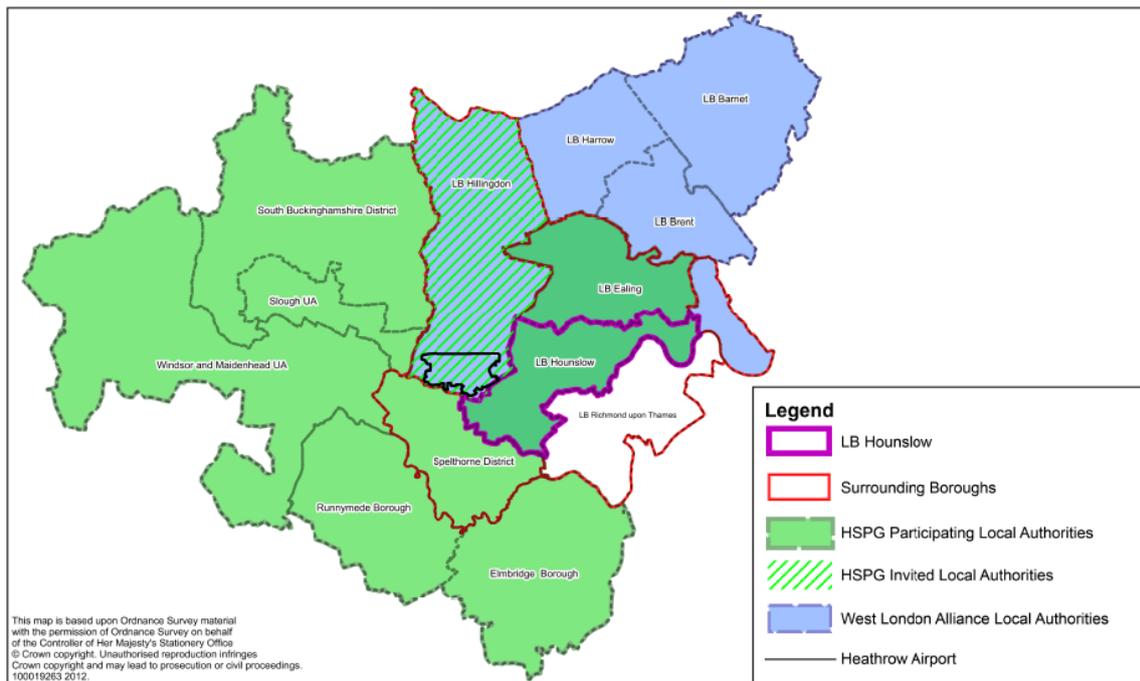


Figure 1 Map of strategic geography covered by this Statement of Common Ground

3.3.1 Description and Justification

3.3.2 The map above (figure 1) describes the strategic geography considered for cooperation on strategic matters as part of this Statement of Common Ground. The area contains the

administrative areas of LB Hounslow and all neighbouring boroughs (Spelthorne BC, LB Hillingdon, LB Ealing, LB Hammersmith and Fulham and LB Richmond), the areas covered by the West London Alliance (WLA) group of boroughs, Old Oak and Park Royal Mayoral Development Corporation (OPDC) and the area covered by the HSPG.

- 3.3.3 This area is appropriate given that it reflects existing borough boundaries, it includes the West London sub-region and the 'best fit' Functional Economic Market Area (FEMA) and linked boroughs identified by LB Hounslow's Employment land Review (ELR, 2016).
- 3.3.4 Heathrow airport is recognised as having a major economic influence upon LB Hounslow and the surrounding area. LB Hounslow is a member of the HSPG and the administrative area covered by its members is also included here to reflect the on-going cooperation on spatial planning matters undertaken through this group.
- 3.3.5 LB Hounslow is a member of the West London Alliance (WLA), a sub-regional partnership between seven West London local authorities - the London Boroughs of Barnet, Brent, Ealing, Hammersmith & Fulham, Harrow, Hillingdon and Hounslow. Although it is not formally a member, the WLA works closely with the OPDC. The partnership is committed to an enduring programme of collaboration and innovation to improve outcomes for West London, covering a remit which includes: increasing economic growth, employment and skills; improving health and wellbeing; delivering increased housing supply; and delivering innovation in joint working. It also has a programme of spatial development work (including commissioning evidence to support local plan-making and coordinating a West London Planning Policy Officers' Group) and works on delivery of strategic infrastructure (including the West London Orbital rail project). The administrative area covered by its members is included here to reflect the on-going cooperation undertaken through this group.
- 3.3.6 These linkages are considered to warrant the production of a Statement of Common Ground between London Borough of Hounslow and the local authorities outlined above in order to demonstrate joint working on strategic matters being undertaken by these authorities and to record where agreements have or have not been reached.

3.4 Strategic Matters and Record of Agreement

3.4.1 Housing (including Gypsies, Travellers and Travelling Show People)

Housing Land Availability

- 3.4.1.1 All London local planning authorities work with the GLA to produce a London-wide Strategic Housing Land Availability Assessment (SHLAA). This assessment is used by the GLA to set each borough's housing target.
- 3.4.1.2 The most up-to-date SHLAA for London is the London SHLAA 2017, produced by the GLA as part of the Draft London Plan evidence base. This gives LB Hounslow a total 10 year target (2019/20 to 2028/29) of 17,820 dwellings, or 1,782dpa.
- 3.4.1.3 LB Hounslow has produced a housing trajectory which indicates that the borough has a pipeline of 19,120 new dwellings over period 2020/21-2029/30. The trajectory indicates that over the plan period 2020/21-2034/35 LB Hounslow can deliver 26,840 dwellings.

Housing Market and Need

- 3.4.1.4 The West London Sub Regional Strategic Housing Market Assessment (WL SHMA 2018) commissioned through the WLA confirms that Hounslow is within the London Housing Market Area. It is also acknowledged that in this part of the South East, HMAs tend to be overlap due to the density of transport networks, both road and rail. This results in localised links across HMA boundaries. As such, there are localised cross boundary links between Spelthorne and Hounslow for housing matters despite these authorities sitting within neighbouring (albeit overlapping) HMAs.
- 3.4.1.5 The most up to date assessment of Housing Need for LB Hounslow is the Hounslow Housing Market Assessment (2018). This sets a total Objectively Assessed Need (OAN) of dwellings, or 1,911dpa, over the period 2019-2034, and 44,525 dwellings, or 1,781dpa, over the period 2016-2041. The SHMA identified a need for 107,000 homes or 33% of need in West London to be affordable over the period. Within Hounslow, 767dpa, or 40%, need to be delivered in affordable tenures, with the majority at a high level of subsidy. The Local Plan reviews require sites capable of delivering affordable housing to seek to achieve a 50% strategic target of affordable housing with a 70%/30% split between London affordable rent and intermediate products.
- 3.4.1.6 The West London Sub Regional Strategic Housing Market Assessment (WL SHMA 2018) identified Hounslow and Spelthorne as being in separate Housing Market Areas, with Hounslow forming part of the London Housing Market Area. The WL SHMA 2018 considers LB Hounslow to have stronger linkages with the other West London Alliance Boroughs.

Gypsies, Travellers and Travelling Show People

- 3.4.1.7 The Council was part of the West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA) in 2019. The assessment uses the PPTS definitions to provide a robust revised assessment of current and future need for Gypsy and Traveller accommodation in the borough for the period 2016-2041. It identifies a need for 7 Gypsy/Traveller pitches, of which 3 are needed in the next 5 years, and 18 travelling show-people plots, of which 10 are need in the next 5 years. Regarding the need for Travelling Showpeople, 3 of the 18 Travelling Showpeople plots are existing unauthorised plots which will be protected and safeguarded by LB Hounslow thereby leaving a total of 15 Travelling Show-people plots to be provided over the plan period. The Plan allocates sites to meet the five-year need of both communities. The Draft London Plan provides its own definition of Gypsies & Travellers. The GTTSAA 2019 identifies a need for 33 Gypsy & Traveller pitches under the draft definition.

Record of agreement

A1. In light of uncertainty around the adoption of the emerging New London Plan, LB Hounslow intend to base their Housing Requirement on the OAN for the borough, as established in the SHMA 2018, which equates to 1,781dpa between 2020 and 2035. In doing so, LB Hounslow will meet the (Intend to Publish) New London Plan 10 year target of 17,820 homes through delivery of the indicative capacities of 7,500 homes for the GWC Opportunity Area and part of the Heathrow Opportunity Area indicative capacity of 13,000 homes (shared with LB Hillingdon).

A2. LB Hounslow has engaged with neighbouring boroughs to identify the distribution of identified housing needs, including the capacity of each authority to meet their own needs and the extent of which they might have spare capacity that might help LBHo's to meet any unmet need. The following positions on meeting housing need are summarised in the table below:

Name	Current housing target (dpa)*	Capacity to meet own identified need	Capacity to meet unmet need
Spelthorne Borough Council	606**	Spelthorne BC plan to meet their housing need.	Spelthorne BC do not currently have any spare housing capacity to meet unmet need.
London Borough of Ealing	1297 (borough)/ 2157 (LPA)	LB Ealing plan to meet their housing need.	LB Ealing do not currently have any spare housing capacity to meet unmet need.
London Borough of Hillingdon	559 / 1083	<i>Please refer to LB Hounslow-LB Hillingdon SCG</i>	<i>Please refer to LB Hounslow-LB Hillingdon SCG</i>
London Borough of Hammersmith and Fulham	1031 / 1609	LB Hammersmith and Fulham adopted their Local Plan in February 2018 and are on track to meet their adopted plan housing target.	LB Hammersmith and Fulham do not currently have any spare housing capacity to meet unmet any need.
London Borough of Richmond upon Thames	315 / 411	LB Richmond are on target to meet their current adopted London Plan housing target.	LB Richmond do not currently have any spare housing capacity to meet unmet need.
LB Brent	1525 / 2325	LB Brent submitted their draft Local Plan to the inspector on 17 th March 2020. LB Brent are on target to meet their current adopted London	LB Brent do not currently have any spare housing capacity to meet unmet need.

		Plan housing target.	
LB Harrow	593 / 802	LB Harrow plan to meet their own housing target as published under the New London Plan (Intend to Publish) targets.	LB Harrow do not currently have any spare housing capacity to meet unmet need.
OPDC	1367	The WLA SHMA 2018 has been completed. It identifies OPDC's housing needs as comprising the combined needs in the constituent boroughs of Brent, Ealing and Hammersmith & Fulham. OPDC has the capacity to provide 25500 of these homes.	OPDC do not currently have any spare capacity to meet unmet need.
LB Barnet	2,349 / 2,364	LB Barnet plan to meet their own housing target of 3,060 new homes per annum based on their 2018 SHMA. This exceeds the target as published under the New London Plan (Intend to Publish).	LB Barnet do not currently have any spare housing capacity to meet unmet need.

Table 1: Housing Need

* For London boroughs both the published / emerging London Plan housing targets (updated to reflect the Intend to Publish version published 09/12/2019) are given here

**Spelthorne BC does not currently have an up to date Local Plan housing target. The figure given represents housing need based upon MHCLG guidance for calculating housing need using the standard method defined by government, and is being used in the interim to project housing growth. This figure should not be confused with a plan target. Updated to reflect 2020-2030 baseline.

A3. In line with paragraph 11 of the NPPF, plans should positively seek opportunities to meet the development needs of their area, and provide for objectively assessed need for housing and other uses, as well as any needs that cannot be met with neighbouring areas, unless certain criteria apply. London Boroughs will continue to plan to meet housing targets set out in the London Plan.

A4. Spelthorne BC and LB Hounslow agree that Spelthorne Borough forms a HMA with Runnymede Borough and Hounslow is located within a single London HMA. However, as confirmed by the West London SHMA, Hounslow holds its strongest links with West London. Spelthorne and Hounslow therefore sit within neighbouring HMAs however both parties acknowledge that in this part of the South East, HMAs tend to be overlapping in nature due to the density of transport networks, both road and rail. This results in localised links across HMA boundaries. It is agreed that there are localised cross boundary links between Spelthorne and Hounslow for housing matters. At present neither authority is requesting assistance from neighbouring HMAs to meet unmet need.

A5. At present Spelthorne BC, LB Ealing, LB Hammersmith and Fulham, LB Richmond upon Thames, LB Brent, LB Harrow and the OPDC are not in a position to accommodate any of LB Hounslow's objectively assessed need for housing.

A6. LB Hounslow can demonstrate a 5 year housing supply and is not requesting assistance from neighbouring authorities to meet unmet need. This is currently evidenced through the housing trajectory which supported the Regulation 19 draft pre-submission version of the local plan reviews, and the trajectory has since been updated to support the Regulation 22 submission Plans. LB Hounslow will share this evidence with partners at the earliest opportunity.

A7. As housing supply evidence is completed by LB Hounslow and the boroughs outlined in the table above, the findings will be shared and discussed with each other at key milestones.

Gypsies, Travellers and Travelling Show People

A8. LB Hounslow policy is to identify sites to meet the needs of Gypsies, Travellers and Travelling Showpeople in accordance with national guidance. The Council considers that any additional sites to meet the draft London Plan definition will be found through the criteria based approach outlined in policy.

A9. The evidence base produced by London Borough of Hounslow and those of adjoining boroughs to assess the level of need for Gypsies, Travellers and Travelling Showpeople accommodation within the strategic area covered by this statement is robust. Each authority will endeavour to meet their identified accommodation needs for these groups within their individual borough boundaries through their respective Local Plans. The parties agree that they do not currently have capacity to meet any identified shortfall in Gypsy, Traveller & Travelling Show People provision from other boroughs.

3.4.2 **Employment**

Employment Land Review

3.4.2.1 The 2016 Employment Land Review (ELR), carried out by consultants Peter Brett Associates, recommended that the 'best fit' Functional Economic Market Area (FEMA) should include LB Hillingdon, LB Ealing, LB Richmond, Spelthorne BC and Slough BC. The ELR also suggests LB Hounslow may have further linkages and similarities with Hammersmith and Fulham and / or LB Brent.

3.4.2.2 The study – updated in 2020 by the same consultants, now known as Stantec - provided employment floorspace requirements for the borough for the period 2019-34. The largest jobs growth for the 2019-34 period is projected to be in the land transport, storage and post sector (1,658 additional jobs 2019-34), followed by media activities (1,620). The computing and information services sector comes in at fourth place, with a 1,300-jobs growth forecast.

3.4.2.3 When the latest Experian projections on economic growth by sector are translated into floorspace requirements for industrial and office uses, the overall demand figures in the ELR update are as follows:

	<i>Offices</i>	<i>Industrial</i>
Net development demand	55,571	199,230
Replacing permitted losses	128,939	53,554
Gross development demand	184,510	252,784
Pipeline of outstanding planning permissions	37,422	70,014
Requirement for plan reviews	147,088	182,770

Table 2: Summary of employment floorspace demand 2019-34 (all figures sqm)

Source: ELR Update 2020, Stantec

Type of space required

3.4.2.4 The requirement figures in Table 2 above show that the plan reviews should plan to provide additional land for 147,088sqm of office floorspace and 182,770sqm of industrial floorspace. The first of these figures relates to B1(a) office floorspace, whilst the second refers to B1(c), B2 and B8 use classes.

3.4.2.5 An analysis of the evidence relating to the economic profile of the borough suggests that the growth sectors are transport and logistics industries operating in large floorplate sheds near Heathrow airport, and media, software and computing industries who seek more flexible space in the GWC area, and where a range of policy designations – including SOLDC and CEZ - supports such an approach. Whilst the former typology requires large B8 distribution sheds near the airport and with convenient access to the strategic road network, the latter requires a very different product – versatile units which can be operated as offices but also as multi-functional workspaces. Such units would be likely to be small and medium-sized units and in close proximity to good public transport links to provide convenient access for the workforce.

3.4.2.6 As a result of these findings, the overall strategy in the GWC Local Plan Review is to allocate development sites which aim for no loss and an overall net gain in industrial uses, but which also introduce a mix of light industrial, offices and residential into specified parts of the plan area. This is to deliver a place-changing agenda for the GWC, introducing

more residents to the area and creating a vibrant leisure and retail offer, an improved public realm and, crucially, much-enhanced public transport to the area. In relation to the employment profile of the GWC area, the policy approach is designed to provide space for the creative, media, digital and ICT industries which have been found to be in demand of more floorspace in this area, much of which is of a type which can be used as offices, light industrial or flexible workspaces.

3.4.2.7 In the WoB, the strategy is to provide land for large format distribution and storage warehouses for transport and logistics businesses much of which is associated with activities at Heathrow Airport. As the ELR shows, there is a very significant demand for additional floorspace of this type of use, but studies have also shown that there is very little land available in the borough’s urban areas to meet this demand. The Council is therefore pursuing whether there is scope for this issue to be resolved under the duty to co-operate, as per the requirement in the NPPF (and which would therefore also cover the “substitution” approach outlined in the draft London Plan) before concluding whether exceptional circumstances are demonstrated to justify releases of Green Belt land to meet this need.

HSPG Joint Evidence Base and Infrastructure Study (JEBIS) and Joint Spatial Planning Framework (JSPF)

3.4.2.8 The HSPG have produced a Joint Evidence Base and Infrastructure Study (JEBIS) for member local authorities surrounding Heathrow (including LB Hounslow, LB Ealing, Spelthorne BC, Runnymede BC, South Bucks DC, Slough BC, Surrey County Council and Buckinghamshire County Council). The study analysed the potential economic development and labour market arising from possible expansion of Heathrow Airport, and explored how this relates to the background growth for which the authorities are already planning. This work has informed the preparation of the Joint Spatial Planning Framework (JSPF) which sets out a framework for the sustainable development of the sub-region, addressing the implications of both ‘baseline growth’ and the additional growth demand forecast to result from the expansion of Heathrow Airport over the next 30 years. The JSPF will sit alongside LB Hounslow’s Local Plan and will help inform the upcoming DCO from Heathrow Airport Limited.

3.4.2.9 At the time of writing there is some uncertainty as to the future of this work given the Appeal Court ruling handed down on 27/02/2019 concerning the legality of the ANPS. On 31st March 2020 the HSPG released a Position Statement outlining the group’s intention to publish the finalised JSPF (February 2020) and accompanying SCG. The statement also explains that HSPG members will continue with the next phase of the group’s work when the situation with regards to the Court of Appeal decision and the economic impacts of COVID-19 are better known

Record of agreement

B1. LB Hounslow has engaged with neighbouring boroughs, those within the ‘best fit’ FEMA and those other authorities identified within the ELR as having economic links with Hounslow. The following positions on meeting employment needs are summarised in the table below:

Name	Capacity to meet own identified need	Capacity to meet unmet need
Spelthorne BC	Spelthorne BC plan to	Spelthorne BC do not

			meet their employment need.	currently have any spare capacity to meet unmet employment need.
		LB Ealing	LB Ealing are on track to meet their own employment needs	LB Ealing do not currently have any spare capacity to meet unmet need
		London Borough of Hillingdon	<i>Please refer to LB Hounslow-LB Hillingdon SCG</i>	<i>Please refer to LB Hounslow-LB Hillingdon SCG</i>
		Slough BC	Slough BC are currently trying to meet their own employment needs but would be interested in further cooperation on this matter through the HSPG	Slough BC do not currently have any spare capacity to meet unmet need. Further engagement on this issue should be undertaken through the HSPG.
		LB Richmond upon Thames	LB Richmond have asked whether LB Hounslow has any additional capacity to meet their employment need. LB Hounslow are not currently in a position to take any further unmet need from LB Richmond.	LB Richmond do not currently have any spare capacity to meet unmet need.
		LB Hammersmith and Fulham	LB Hammersmith and Fulham intend to meet their own identified need for employment.	LB Hammersmith and Fulham do not currently have any spare capacity to meet unmet need
		Runnymede BC	Runnymede BC are looking to meet all of their employment need. Further engagement on this issue should be undertaken through the HSPG.	Runnymede BC do not currently have any spare employment land capacity to meet unmet employment needs from Hounslow within its area. Further engagement on this issue should be undertaken through the HSPG.
		LB Brent	LB Brent submitted their draft Local Plan to the inspector on 17 th March 2020. LB Brent intend to meet their own identified need for employment through their new Local Plan.	LB Brent do not currently have any spare capacity to meet unmet need

LB Barnet	LB Barnet plan to meet their employment need.	LB Barnet do not currently have any spare capacity to meet unmet employment need.
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Table 3: Employment Floorspace Need

B2. LB Hounslow intends to meet its OAN for employment land through the draft GWC and WoB Local Plan reviews and draft site allocations. LB Hounslow will meet its Great West Corridor Opportunity Area indicative capacity of 14,000 new jobs and part of the Heathrow Opportunity Area (West of Borough) indicative capacity of 11,000 new jobs as set out in the London Plan.

B3. At present Spelthorne BC, LB Ealing, LB Hammersmith and Fulham, Slough BC, Runnymede BC, LB Richmond upon Thames and LB Brent are not in a position to accommodate any of LB Hounslow’s objectively assessed need for employment floorspace.

B4. LB Hounslow and the other HSPG members will continue to monitor the situation as regards Heathrow expansion in light of the recent Appeal Court ruling and the economic impacts of COVID-19.

B5. All parties agree with the conclusions drawn from analysis of the FEMAs to which they are part and acknowledge the robustness of one another’s evidence bases.

3.4.3 Retail

Retail and Town Centre Needs Study 2018

3.4.3.1 The main centres in the borough are Hounslow (a Metropolitan centre), Chiswick (a Major Centre), Brentford and Feltham (District Centres). Hounslow also contains a number of large and small neighbourhood centres.

3.4.3.2 LB Hounslow commissioned a Retail Needs Assessment (2017) to inform the approach taken toward retail provision and town centre development as part of the Local Plan review.

3.4.3.3 In terms of convenience goods floorspace provision, the study identifies that, with the exception of Feltham, there is capacity for additional convenience goods floorspace in the other town centres within the Borough, in particular Brentford. There is also no qualitative retail need for additional convenience goods floorspace within Hounslow, Chiswick or Feltham but Brentford could benefit from additional convenience goods provision. In terms of comparison goods provision, the study found that the majority of capacity is identified in Hounslow Town Centre with the High Street Quarter development contributing to meeting the current qualitative and quantitative need. Chiswick Town, Feltham, and Brentford could benefit from an increase in the comparison goods provision to offer a greater variety of comparison goods retailers.

3.4.3.4 The study also undertook a review of existing relevant retail policies, including those related to town centre hierarchy, local retail impact threshold, town centre boundaries and shopping boundaries.

Record of agreement

C1. LB Hounslow is actively pursuing regeneration opportunities in its town centres through the Local Plan reviews and the adopted Local Plan 2015 in order to improve their offer and choice. LB Hounslow is not looking to significantly alter the position of its centres in the wider retail hierarchy through the Local Plan reviews.

C2. All parties acknowledge the robustness of one another's retail evidence. There are currently no outstanding cross boundary retail issues and no parties are requesting one another to help meet any unmet retail needs at present.

3.4.4 Green Belt and Environmental Matters

Evidence base keys findings

Green Belt

- 3.4.4.1 LB Hounslow commissioned Arup to undertake a Stage 2 Green Belt Review (Draft 2019). This builds upon work undertaken in the Stage 1 Green Belt Review (2015) and LB Hounslow's draft study (2017). The review has been prepared in accordance with the revised NPPF (2018).
- 3.4.4.2 The study has undertaken a comprehensive assessment of land within the green belt with respect to its performance against the purposes set out in paragraph 134 of the NPPF. The starting point for the Green Belt Assessment was to assess how far individual parcels of land in the borough meet the Green Belt purposes set out in the National Planning Policy Framework. Where it has been found that parcels do not meet these purposes strongly, they have been considered further to assess (a) whether they could contribute to sustainable development, (b) whether they are deliverable and developable and (c) whether the benefits they would bring amount to exceptional circumstances for Green Belt release.
- 3.4.4.3 A number of the sites which were found in the first stage of the assessment as not performing strongly when assessed against Green Belt purposes were nevertheless assessed as performing an important role as open space, providing valued gaps in the borough's built form. These were therefore entered into a separate assessment to ascertain whether it would be appropriate to designate them as Metropolitan Open Land, a designation which affords a degree of protection equivalent to that for Green Belt.
- 3.4.4.4 The assessment and subsequent assessment work has concluded that exceptional circumstances have been demonstrated justifying a release of Green Belt in a number of instances. Some of these are for employment development, recognising the very substantial requirement for additional land for industrial floorspace and lack of alternative sites for this type of development, together with the need for it to be located in close proximity to Heathrow Airport. Others are for housing development, recognising the inability of the Borough to meet the housing targets in the London Plan without releasing this land. Again, consideration has been given to the range of potential options to meet this need, including greater density of development in the built-up area and the possibility of neighbouring authorities taking up any unmet need. This has not offered any

alternative options for meeting the full housing need identified by the London Plan targets.

- 3.4.4.5 One parcel of land in Bedfont has been safeguarded to deliver strategic transport infrastructure improvements, in the form of the Southern Rail Access to Heathrow Airport and associated new railway station at Bedfont, which will also offer the unique opportunity to deliver mixed-use development in a highly accessible location.
- 3.4.4.6 Neither the Stage 2 Green Belt Review nor the policies outlined in the WoB Local Plan review recommend that any parcels of land which directly adjoin green belt land belonging to any neighbouring boroughs should be removed from the green belt.
- 3.4.4.7 The Spelthorne Green Belt Assessment Stage 1 finds that the band of Green Belt between Spelthorne and Hounslow is part of a narrow but essential arc of Green Belt preventing the sprawl of the Greater London built-up area and its coalescence with towns in Surrey. The Spelthorne Green Belt Assessment Stage 2, which comprises a finer grained assessment of smaller Green Belt parcels, similarly sets out that the band of Green Belt separating Spelthorne from Greater London performs an important strategic role in preventing urban sprawl.

Record of agreement

D1. Metropolitan Green Belt is a strategic cross boundary matter for LB Hounslow, LB Hillingdon, Spelthorne BC and LB Richmond upon Thames given that each borough contains areas of designated Green Belt land which span their respective administrative boundaries.

D2. All parties have taken into consideration the importance of the Green Belt within their respective areas as part of the integrity of the wider Metropolitan Green Belt, with particular reference to Green Belt land that acts as the strategic arc preventing the continued outward sprawl of London and the merging of London with Surrey Towns.

D3. Where there are proposals to amend the Green Belt boundary between LB Hounslow and any adjoining boroughs, opportunities will be sought to strengthen the remaining boundary and retain a strategic buffer between them, in particular where this exists between Greater London and Surrey.

3.4.5 Infrastructure (including transport, community and green infrastructure)

Transport Impact Studies

- 3.4.5.1 Two new transport studies were undertaken in 2019 to contribute to the transport evidence base for the Local Plan Reviews. Both were based on the results of strategic transport modelling carried out using TfL's suite of strategic modelling tools and assessed the current state of the transport network, the future impact of expected population growth and development and the effects of the introduction of transport improvements ('mitigations').

West of Borough Highways Impact study

3.4.5.2 This study analysed the results of highway modelling of the West of Borough area and included both low growth and high growth development scenarios. Both scenarios took account of expected background growth in the area, but the low growth scenario included only half of the London Plan development target for the Bedfont area. Mitigations included bus priority schemes, new cycle infrastructure, junction improvements and mode shift resulting from travel demand management measures such as School Travel Plans.

3.4.5.3 Key findings:

1. The impact of unmitigated growth on the transport network will be felt across Hounslow although most acutely in the Bedfont area under the high growth scenario, negatively impacting journey times.
2. The mitigation measures proposed will likely provide improved highway network conditions with journey times under the low growth scenario close to pre-development levels. The mitigation package does not however bring traffic levels back to pre-development levels. Their introduction is expected to reduce the impact of additional low growth development in the borough but only partially offset the impact of high growth development.
3. Other schemes such as Heathrow Southern Rail Access or equivalent bus improvements could further help reduce the transport impact from the proposed high growth scenario.

Great West Corridor Strategic Transport Study

3.4.5.4 This transport study has been carried out as a jointly funded and managed project between TfL and LB Hounslow and the final report and its conclusions have been agreed by both parties. The study analysed the results obtained from highway and public transport modelling of the ambitious housing and employment development targets for the Opportunity Area as defined in the London Plan.

3.4.5.5 Potential mitigations were wide ranging and included tube and rail line upgrades, a new rail link between Brentford and Southall, the West London Orbital (WLO) rail link and a bus rapid transit scheme along the A4. The study also took into account the mode shift expected as a result of applying TfL's Healthy Streets Framework to improve active travel connections. Mitigations were first tested individually and then grouped into indicative rail focused and bus focused packages to test their cumulative impact.

3.4.5.6 The study was completed in May 2019. Key conclusions indicate that:

1. The forecast growth in the GWC is considerable and if unmitigated has the potential to negatively impact journey times across all modes.
2. The mitigation packages are likely to reduce traffic levels to pre-development levels but may not fully offset the impact on journey times.
3. Potential issues such as overcrowding on the public transport network were successfully addressed by the mitigation packages.
4. New development will need to be phased and delivered concurrently with transport improvements if negative impacts on the transport network are to be avoided.
5. Ambitious targets for sustainable transport use (active travel and public transport) in line with the Mayor's Transport Strategy will be needed if the full levels of London Plan

proposed development are to be supported.

Southall rail link

- 3.4.5.7 A GRIP 2 level feasibility study was completed in early 2016. This concluded that the re-provision of passenger services on this link was technically viable. A business case was also completed that concluded that the link had a 'high' value for money with an expected benefit to cost ratio of 3.0:1 using the Department for Transport's assessment approach.
- 3.4.5.8 Network Rail completed their detailed optioneering report (GRIP 3) in 2019. The report made recommendations as to the single 'preferred' design option for the infrastructure required to realise this service. An update to GRIP3 is being carried out in 2020 to accommodate several design changes with the objective of reducing overall costs.
- 3.4.5.9 Once GRIP 3 is complete, GRIP 4 (Approval in Principle) will begin which will substantively agree the final form of the scheme, subject to consents and detailed design.
- 3.4.5.10 LBH are continuing to investigate potential funding source options. These include contributions from developers, contributions in the form of grants from Government bodies (e.g. DfT or TfL) and borrowing (from public or private sectors) repaid by increased business income or a Workplace Parking Levy (WPL).
- 3.4.5.11 Following a public consultation into the introduction of a WPL in Brentford, LB Hounslow are currently preparing a business case which will analyse in detail the benefits and feasibility of the scheme. Once complete, a further public consultation will take place over winter 2020/2021. The business case and results of the public consultation will be presented to Cabinet in spring 2021, with the intention of undertaking an initial trial run of the scheme over summer 2021 should the scheme be approved by The Mayor of London.
- 3.4.5.12 An outline business case for the shuttle rail link to Southall Crossrail was submitted to the Department for Transport in 2019. LB Hounslow have subsequently updated the Strategic Outline Business Plan (SOBC) following a detailed challenge session with DfT advisors. If successful, the SOBC will place the scheme on the Rail Network Enhancement Pipeline (RNEP) and could unlock a significant capital contribution. Further discussions with DfT are expected in 2020 to confirm the next stage of business case development.

West London Orbital (WLO)

- 3.4.5.13 The West London Orbital (WLO) is a proposed 11 mile long extension of the Transport for London Overground rail network that will link Hendon and West Hampstead to the north-east with Kew and Hounslow in the south-west. It would bring back into passenger use the Dudding Hill Line between Cricklewood and Acton; trains would then use the North London Overground line and the South Western mainline between Kew Bridge and Hounslow and serving intermediate stations at Lionel Road, Brentford, Syon Lane and Isleworth. It is supported by Proposal 88 in the Mayor's Transport Strategy (MTS): "The Mayor, through TfL, the West London Alliance boroughs and Network Rail, will work towards delivery of a new London Overground 'West London Orbital' line connecting Hounslow with Cricklewood and Hendon via Old Oak, Neasden and Brent Cross". This support was reaffirmed in TfL's 2018/19-2023/24 Business Plan. The project is included in the draft London Plan's indicative table of transport schemes (table 10.1).

3.4.5.14 Since publication of the MTS West London planning authorities (including Hounslow) have been working together and with Transport for London to develop the business case for the WLO, particularly in identifying development capacity around WLO stations. They have also ensured the WLO is fully supported in local plans. A strategic outline business case has been prepared (GRIP 1). The Strategic Outline Business Case (SOBC) for the WLO has been published and concluded that there was a strong case for the scheme to be taken forward

3.4.5.15 Work on the next phase began in autumn 2019 and will further develop the project, focussing on technical feasibility, identification of economic benefits and funding/financing (GRIP2). This stage will also include the first round of public consultation on the scheme. West London Boroughs will continue to be closely involved in development of the case for the project and options for its funding and financing.

Southern Rail Access

3.4.5.16 LB Hounslow has continued to promote a preferred alignment for this new link which would connect Feltham to Heathrow via a new station in Bedfont. There are several other possible alignments and all are to be assessed by DfT.

3.4.5.17 A meeting was held with the DfT in May 2019 to outline to stakeholders how a framework for the assessment of the various proposals would be created. LB Hounslow will be included in an engagement exercise regarding the objectives by which each alignment will be assessed. The objectives will then be used as the basis of a Strategic Outline Business Case which will be developed for each proposed alignment. This will include an investigation of the cost and benefits of each scheme as well as an indication of deliverability.

Gunnersbury Station

3.4.5.18 Significant improvements to the capacity of Gunnersbury Station are required to support development in the east of the Great West Corridor. The GWC Masterplan and GWC Plan policy GWC6 and GWC P3 support significant improvements to station capacity and environment, potentially with the opening of a secondary entrance from Wellesley Road. This will be facilitated through enabling development.

3.4.5.19 In February 2020 TfL in consultation with LB Hounslow submitted a funding application to the TfL Growth Fund for station capacity improvements. Feedback on the application is expected in Spring/Summer 2020.

Record of agreement

E1. TfL have been consulted on policy preparation and strategic policies in both local plan reviews (GWC6 'Connecting People and Places' and WoB6 'Connecting People and Places') have been prepared in line with the findings of the Strategic Transport Impact Assessments undertaken (Great West Corridor Strategic Transport Study and West of Borough Strategic Transport Study respectively).

E2. Should the Hounslow SRA proposal go ahead, TfL will work with LB Hounslow to identify the necessary interventions that would enable the scheme to be delivered and operate effectively, in order to ensure that it is well integrated with the wider network and does not result in unacceptable impacts to either stations or rail services.

E3. LB Hounslow and TfL will continue to work together to ensure that policies and projects relating to Gunnersbury Station are implemented in order to improve accessibility and to accommodate growth within the area.

E4 LB Hounslow, other West London local planning authorities and Transport for London will continue to work together to develop the case for the West London Orbital and identify the steps necessary to implement the project.

E5. All parties agree to keep each other updated as infrastructure evidence is produced and as discussions with infrastructure and service providers continue if any relevant cross boundary matters arise, or if further infrastructure projects are found to be necessary.

E6. HSPG member authorities will continue to work collaboratively through the Heathrow Strategic Planning Group in relation to matters associated with strategic cross boundary transport schemes.

E7. LB Hounslow and Spelthorne BC acknowledge each other's proposals for a Southern Rail Link to Heathrow. The parties involved in this agreement are not the decision makers and will await the outcomes of these plans to inform future discussions.

E8. The evidence base indicates that the unmitigated growth proposed in both plan areas would result in an impact upon the road network, however both the GWC STS and WoB HIA propose mitigation which in both cases should sufficiently address this. These measures have been incorporated into the strategic and place policies within the WoB and GWC Local Plan Reviews, and the site requirements/phasing set out in the draft Site Allocations.

E9. LB Hounslow and Spelthorne BC have robustly assessed the impacts of growth in their Local Authority areas on the highway network and will engage with one another and with any additional relevant bodies should any cross boundary issues arise.

E10. At present no specific cross boundary infrastructure issues between the parties to this agreement have been identified beyond those identified above.

3.4.6 Conservation and enhancement of the natural, built and historic environment

Key Evidence base findings:

Great West Corridor Masterplan

- 3.4.6.1 The Great West Corridor Masterplan was informed by guidance from Historic England, as well as engagement with Royal Botanical Gardens Kew and LB Richmond Upon Thames. This resulted in the development of a detailed and robust methodology which has been used to establish an appropriate building height for each tested location which is deemed to be acceptable in respect of the individual and cumulative impacts upon heritage assets in the context of the comprehensive re-development and regeneration of the Great West Corridor area.
- 3.4.6.2 The Views Assessment work carried out as evidence for the Great West Corridor Masterplan has shown that tall buildings (with height parameters as defined by the heights framework) can enable the Council to meet its housing and other strategic targets while protecting the significance of adjacent heritage assets, acknowledging that in the case of Kew Gardens any further harm would be unacceptable given the level of harm there already being near substantial in accumulation. Harm to other assets is not supported by the Council, but it is recognised the NPPF allows for less than substantial harm if public benefits outweigh that harm. The Council acknowledges that this is an exacting test to meet. In accordance with this ethos the Council's approach would result in no further harm to the Royal Botanic Gardens, Kew UNESCO World Heritage site.

Feltham Masterplan and West of Borough Capacity Study

- 3.4.6.3 The Feltham Masterplan (2017) and West of Borough Capacity Study (2016) aims to optimise the potential of the area to support housing delivery, job creation and the provision of new infrastructures to serve the local community and new development. The studies have also played a role in shaping regeneration within the District Centre, with the rest of the WoB area allowing for smaller scale industrial buildings and housing to accommodate growth without causing unmitigated low level harm to any designated heritage assets.

Scheduled Ancient Monuments

- 3.4.6.4 In discussions LB Hounslow and Historic England on 14/11/18 it was agreed that it may be possible to build around the designated Scheduled Ancient Monuments located on the Mayfield Farm site (as part of 'Heathrow Gateway') allocated within the WoB plan in the far west of the borough and still achieve sustainable development whilst conserving and enhancing the heritage asset as a visitor's destination.

Record of agreement

F1. LB Hounslow, Historic England, Royal Botanical Gardens Kew and LB Richmond Upon Thames have engaged with one another in relation to the impact of tall buildings within the GWC area in order to confirm that the height parameters set out in the GWC Masterplan would not adversely impact designated heritage assets in the surrounding area. As set out under paragraph 2.2, separate SCGs have been entered into to allow the relevant parties to agree positions and minor modifications to both the GWC Masterplan and GWC Local Plan Review policy GWC5 and place policies GWC P1, GWC P2 and GWC P3.

3.5 Governance Arrangements

- 3.5.1 It is agreed that informal discussions will occur between neighbouring authorities on the cross boundary issues referred to in this Statement of Common Ground in the form of officer level meetings at least once every twelve months with escalation of matters to Member level where necessary. This is in addition to the opportunities for inter-borough discussion of strategic matters provided by the three meetings each year of the WLA Chief Planners', and quarterly meetings of the WLA Planning Policy Officers', groups.
- 3.5.2 HSPG members will continue to engage with one another through the HSPG secretariat and will continue to monitor the situation with regards to the future work of the group, including that of its Spatial Planning Sub Group
- 3.5.3 It is agreed that this Statement of Common Ground will be reviewed by all authorities at a joint duty to cooperate meeting which will be held on an annual basis.
- 3.5.4 Where any one of the parties to this Statement of Common Ground is undertaking a Regulation 18 consultation, Regulation 19 publication or submitting a Local Plan to the Secretary of State, it will be the responsibility of that party to co-ordinate the review and updating of relevant aspects of this SCG for agreement with appropriate parties for that event (as necessary).

3.6 Record of on-going cooperation and timetable for review

- 3.6.1 The following table is intended to monitor the progress made toward gaining agreement on strategic matters addressed in this statement of common ground. The table will be updated as and when further progress has been made.

LPA / Body	Statement sent date	Status	Outstanding Issues to be resolved	Summary of engagement to date
Spelthorne BC	V6 sent 22/06/2020	Joint SCG Signed	-	Local Plan Reviews and strategic cross boundary issues discussed by officers at meeting on 18/07/2017 and on 13/04/2018.

				<p>LB Hounslow and Spelthorne BC have engaged on preparation of draft annex LBH-SBC SCG which this SCG seeks to update. A meeting was held on 08/10/18, followed by email correspondence.</p> <p>A meeting was held on 12/12/19 to discuss points raised at Regs19 and how these might be addressed in the SCG. LBH and Spelthorne continue to engage with one another on highways related matters.</p>
LB Hillingdon	LB Hounslow-LB Hillingdon SCG sent 11/06/2020	Awaiting response	Review of LB Hounslow-LB Hillingdon SCG	<p>Local Plan Reviews and Heathrow Opportunity Area discussed by officers at meetings on 19/06/2017 and 23/03/2018. Strategic cross boundary matters discussed at a duty to cooperate workshop on 15/03/2019.</p> <p>On-going email correspondence to discuss matters raised at meetings.</p> <p>A meeting was held in January 2020 to discuss matters arising from LB Hillingdon's Regs19 response. At the meeting it was decided that a separate SCG should be entered to agree position on 4 main matters: housing need; green belt release (including site allocation and Land South of Western International Market); the Heathrow Opportunity Area and employment demand implications; and Heathrow expansion uncertainty for forward plan making. A revised SCG was sent to LB Hillingdon on 11/06/2020 along with key evidence base documents.</p>

LB Ealing	V6 sent 22/06/2020	Joint SCG Signed	-	Local Plan Reviews and strategic cross boundary issues discussed by officers at meeting on 18/07/2017 and at an HSPG meeting (between LB Hounslow, LB Ealing and HSPG staff members) on 03/04/2019.
LB Hammersmith and Fulham	V6 sent 22/06/2020	Joint SCG Signed	-	Local Plan Reviews and strategic cross boundary issues have been discussed by officers during a conference call on 11/06/2019 and subsequently via email.
LB Richmond upon Thames	V6 sent 22/06/2020	Joint SCG Signed	Note separate GWC Heritage / Masterplan SCG also being agreed.	<p>Local Plan Reviews and cross boundary strategic matters discussed by officers at meeting on 18/01/2016, 19/07/2017 and at a duty to cooperate workshop on 12/03/2019.</p> <p>LB Richmond attended a workshop to discuss the emerging GWC Masterplan on 17/10/2017.</p> <p>Specific meetings on the development of the GWC Masterplan and Capacity Study were held between LB Hounslow, GLA, Royal Botanic Gardens Kew, Historic England and LB Richmond on 13/11/18, 19/03/19 and 26/06/2019. After a meeting on 30/01/20 and subsequent engagement it was agreed that entering into a separate SCG to agree positions on the draft GWC Masterplan and Heights Framework within the emerging GWC LPR was the best course of action.</p>
Slough BC	V6 sent 22/06/2020	Joint SCG Signed	-	Local Plan Reviews and strategic cross boundary issues discussed by officers at a duty to cooperate workshop on 15/03/2019 and subsequently via email.
Runnymede	V6 sent	Joint SCG	-	Runnymede Local Plan review

BC	22/06/2020	Signed		<p>and strategic issues discussed at meeting on 22/04/2016.</p> <p>LB Hounslow Local Plan Reviews and strategic cross boundary issues discussed at duty to cooperate workshop on 15/03/2019 and subsequently via email.</p>
The Mayor of London / GLA	<p>1st draft LB Hounslow-GLA SCG sent 04/06/2020</p> <p>2nd draft LB Hounslow-GLA SCG sent 12/08/2020</p>	Awaiting response	Review of SCG	<p>LB Hounslow and GLA have engaged with one another throughout preparation of the WoB and GWC local plan reviews. Both Local Plan Reviews were discussed at a meeting on 28/07/2017, and the GWC plan review was discussed at further meetings on 16/04/2018, 16/05/2018, 15/06/2018, 11/07/2018, 25/09/2018.</p> <p>A meeting was held between GLA and LB Hounslow on 25/06/2019 to discuss employment, affordable housing, the Heathrow Opportunity Area, Green belt issues and duty to cooperate. A meeting was held on 23/04/2020 to discuss general conformity matters. It was decided that entering into an LB Hounslow-GLA SCG would be the most expedient way to evidence joint working. A further meeting was held on 15/07/2020 to clarify outstanding issues and further information was shared with the GLA on 12/08/2020.</p> <p>Specific meetings on the development of the GWC Masterplan and Capacity Study were held between LB Hounslow, GLA, Royal Botanic Gardens Kew, Historic England and LB Richmond on 09/10/18, 13/11/18, 19/03/19 and 30/01/20.</p>

Surrey CC	V5 sent 17/04/2019	Further engagemen t	Agree evidence to be supplied and draft LB Hounslow- Surrey CC SCG	<p>Surrey CC submitted a representation at Regulation 19 consultation raising issues around the potential impact of growth within the WoB area upon roads in Spelthorne. A meeting was held on 10/02/2020 to address these matters and further clarification was sought from consultants.</p> <p>A subsequent meeting was held on 04/06/2020 to discuss next steps and to discuss the potential of entering into a LB Hounslow-Surrey CC SCG.</p>
LB Barnet	V6 sent 22/06/2020	Joint SCG Signed	-	Local Plan Reviews and strategic cross boundary issues discussed by officers at West London Alliance Planning Policy Officers Group meetings, and subsequently via email.
LB Brent	V6 sent 22/06/2020	Joint SCG Signed	-	Local Plan Reviews and strategic cross boundary issues discussed by officers at a duty to cooperate workshop on 11/12/2019, and subsequently via email.
LB Harrow	V6 sent 22/06/2020	Joint SCG Signed	-	Local Plan Reviews and strategic cross boundary issues discussed by officers via email between November 2019 – August 2020
OPDC	V6 sent 22/06/2020	Joint SCG Signed	-	OPDC submitted a representation at Regulation 19 consultation stage. Information on the Local Plan Reviews and strategic cross boundary issues were set out in the draft versions of the SCG and circulated to OPDC for comment and agreement via email between November 2019 – August 2020.
TfL	V6 sent 22/06/2020	Joint SCG Signed	-	LB Hounslow and TfL have engaged with one another throughout preparation of the WoB and GWC local plan

				<p>reviews. Local Plan Reviews were discussed at a meeting on 28/07/2017 with GLA, and on 13/10/2017.</p> <p>Subsequent engagement on Local Plan Review matters has also been undertaken through regular, on-going bi-lateral meetings to discuss local and strategic transport issues.</p>
Historic England	LB Hounslow-Historic England SCG sent 04/06/20	Awaiting response	Separate GWC Heritage / Masterplan SCG also being agreed.	LB Hounslow and Historic England have engaged with one another throughout the preparation of the GWC Masterplan and Capacity Study. Specific meetings were held between LB Hounslow, GLA, Royal Botanic Gardens Kew, Historic England and LB Richmond on 09/10/18, 13/11/18 and 19/03/19. After a meeting on 30/01/20 and subsequent engagement it was agreed that entering into a separate SCG to agree positions on the draft GWC Masterplan and Heights Framework within the emerging GWC LPR was the best course of action.

3.6.2 The following table provides information on the plan review, update and submission timetables for the local authorities which are signatories to this statement

Authority	Present plan adoption date	Proposed review date	Target Reg.18 date	Target Reg.19 date	Target submission date	Proposed date for adoption
Spelthorne BC	2009	2014	November 2019 – January 2020	Jan – Feb 2021	April 2021	March 2022
LB Hillingdon	2012 / 2019	2020	TBC	TBC	TBC	TBC
LB Ealing	2012/2013	2019	Autumn / Winter 2020	Autumn 2021	Winter 2021	Spring 2022
LB Hammersmith	2018	-	-	-	-	-

and Fulham						
LB Richmond upon Thames	2018	2019	Spring 2021	Spring / early Summer 2022	Autumn / Winter 2022	Spring 2024
Slough BC	2006	2015	February 2020	Summer 2021	Winter 2021	Summer 2020
Runnymede BC	2001	2016	Summer 2016	January – February 2018 / May – June 2018	July 2018	Summer 2020
GLA	2016	2017	-	December - March 2017	December 2019	2020
LB Barnet	2012	2019	January – March 2020	Autumn 2020	Winter 2020/21	Winter 2021
LB Brent	2010	2017	November 2018 – January 2019	October – December 2019	Spring 2020	Late 2020
LB Harrow	2012/2013	2020	November - December 2020	Autumn 2020	Spring 2023	Autumn 2023
OPDC	-	-	-	-	Submitted October 2018	TBC

Table 4: Record of on-going cooperation

3.6.3 The SCG will be reviewed annually to take account of plan preparation updates and/or local developments. As set out in the Governance Arrangements section above, it will be the responsibility of the party in question to co-ordinate the review and updating of this SCG where they are undertaking a Regulation 18 consultation, Regulation 19 publication or submitting a Local Plan to the Secretary of State.

Appendix 2

LB Hounslow Local Plan Reviews

Statement of Common Ground

Between

London Borough of Hounslow

And

London Borough of Hillingdon

December 2020

1. Introduction

- 1.1. This Statement of Common Ground has been prepared between the London Borough of Hounslow (LBHo) and LB Hillingdon (LBHill). It seeks to inform the independent examination of LBHo's Draft Vol.2 Site Allocations, Great West Corridor (GWC) Local Plan Review and West of Borough (WoB) Local Plan Review and will be submitted to the Planning Inspector.
- 1.2. It sets out both parties' agreed positions in relation to strategic cross boundary matters identified in duty to cooperate meetings and LBHill's Regulation 19 representation, with outstanding issues addressed in the LBHill's updated response provided on 19/08/2020.

2. Background

- 2.1. LBHo and LBHill have engaged with one another to discuss duty to cooperate matters throughout the preparation of the GWC and WoB Local Plan reviews. This has included discussion of the Heathrow Opportunity Area and its implications for the Local Plan reviews at meetings on 19/06/2017 and 23/03/2018. In the run up to the Regulation 19 consultation, strategic cross boundary matters were discussed at a duty to cooperate workshop on 15/03/2019. Work on a joint SCG with other neighbouring and partner local authorities took place throughout Spring 2019 and a draft SCG accompanied the draft submission version of the Local Plan reviews at Regulation 19 consultation (June-September 2019).
- 2.2. LBHill made representation at Regulation 19 consultation on 25/09/2019 raising a number of cross boundary issues related to the draft submission WoB Local Plan Review. A further meeting was held on 14/02/2020 to discuss these issues and to cooperate on the best way forward. Citing the following significant material changes that impact plan-making, LBHill submitted an updated response on 19/08/2020:
 - The Civil Aviation Authority's publication of CAP 1871.
 - The Court of Appeal declaring that the Government's Airports National Policy Statement (ANPS) was unlawful.
 - The economic impact of the COVID-19 pandemic and the need for expansion being contingent on the economy recovering after the pandemic.
- 2.3 This SCG sets out areas of agreement between the two parties, with outstanding issues addressed in the LBHill's updated response provided on 19/08/2020.

3. Strategic Geography

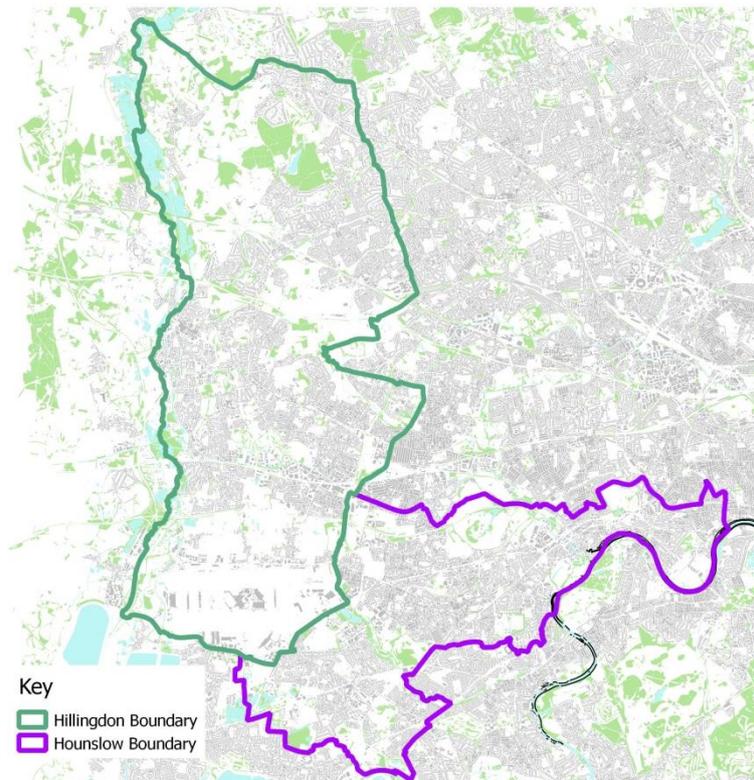


Figure 1: Map of strategic geography

- 3.1. The map above (figure 1) describes the strategic geography considered for cooperation on strategic matters as part of this Statement of Common Ground. The area contains the administrative areas of LB Hounslow and LB Hillingdon.

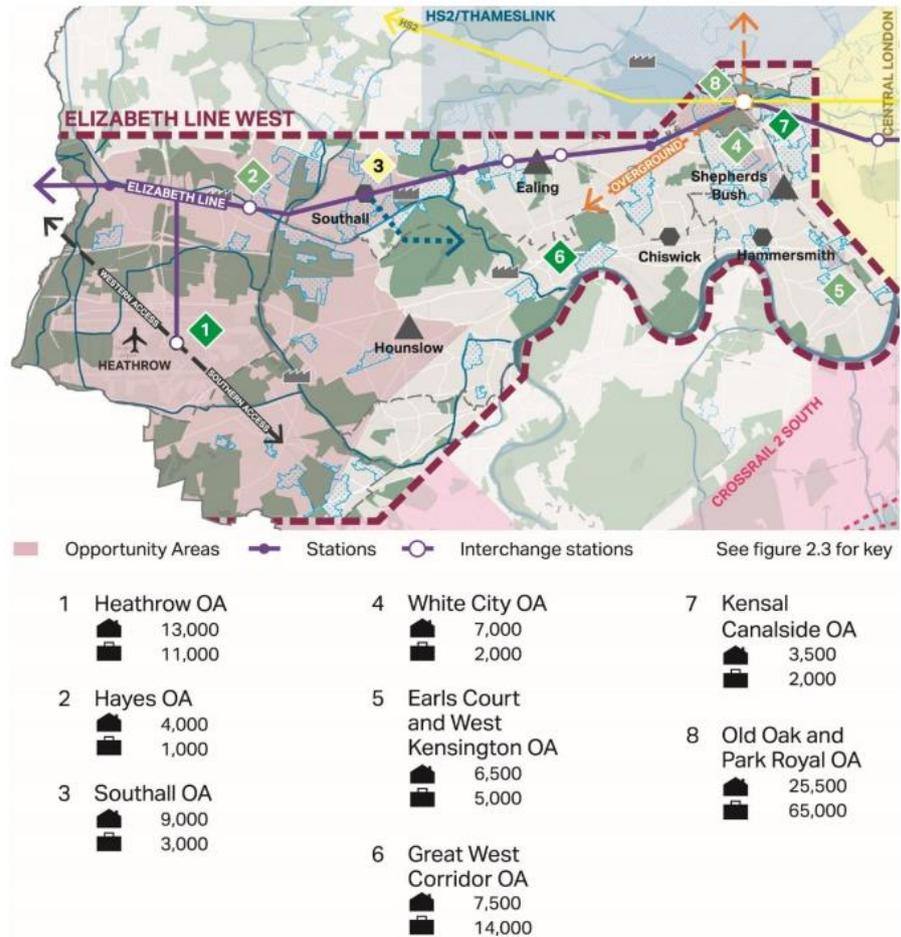


Figure 2: Extract from 'Elizabeth Line West' growth corridor diagram, Draft New London Plan (December 2019)

3.2. Figure 2 above is an extract taken from the draft New London Plan and shows the Heathrow Opportunity Area (OA) within the Elizabeth Line West Growth Corridor. The diagram indicates the general location of the HOA which spans part of both boroughs.

3.3. Both authorities share an administrative boundary and a designated Opportunity Area. As LBHo are preparing a Local Plan review in order to plan for the anticipated growth in their part of the shared Heathrow OA (the draft West of Borough local plan review) it is considered necessary to enter into a statement of common ground with LBHill to demonstrate joint working on strategic, cross-boundary matters, and to record where agreements have been reached.

4. Strategic Matters and Record of Agreement

4.1. Green Belt

Record of agreement

4.1.1. Metropolitan Green Belt is a strategic cross boundary matter for LB Hounslow and LB Hillingdon given that areas of designated Green Belt land span both boroughs' respective administrative boundaries.

4.1.2.If proposals to amend the Green Belt close to the administrative boundary between LB Hounslow and LB Hillingdon are determined to be sound through the Examination in Public of the WoBP, opportunities will be sought to maintain a strong Green Belt boundary between the boroughs.

4.2. Heathrow Opportunity Area employment demand implications

Record of agreement

4.2.1.The Heathrow Opportunity Area (OA) was introduced by the London Plan (2016). The plan calls for an integrated approach to the distinct environmental and growth issues facing the area around Heathrow both within and beyond London and recognises the importance of the airport as a driver for economic growth within the opportunity area and beyond. The draft New London Plan includes increased indicative capacities for 13,000 homes and 11,000 jobs for the OA. The extent of the OA as shown in the draft London Plan covers the boroughs of LBHill and LBHo (see figure 2). The GLA and LB Richmond Upon-Thames consider that LB Richmond Upon -Thames does not form part of this OA.

4.2.2.LBHill confirms that it has addressed its own needs for industrial and office floorspace through the recent adoption of the Local Plan: Part 2. LBHill confirms that it will need to review its strategy for meeting industrial and office floorspace once the Spatial Development Strategy (SDS) is adopted.

4.2.3.LBHill confirms that it does not have any assessed spare capacity to meet any potential unmet need that may arise in LBHo.

4.3. Heathrow Opportunity Area housing need and capacity

Record of agreement

4.3.1. LBHill have a housing target of 559dpa as allocated through the current London Plan (2016). LBHill have met and surpassed this target to date, in part through the recent adoption of the Local Plan: Part 2. The Intend to Publish version of the draft New London Plan would increase this target to 1083dpa. LBHill confirms that it will need to review its strategy for meeting this target once the Spatial Development Strategy (SDS) is adopted.

4.3.2.LB Hounslow intends to meet its OAN for housing through the plan reviews, with an appropriate buffer (average buffer of 5%, with a 15% buffer should Heathrow Gateway be delivered) as per NPPF para 73. LBHill confirms that it does not have any assessed capacity to meet any potential unmet need that may arise in LBHo.

4.3.3.As London Boroughs, LBHo and LBHill will continue to plan to meet housing targets set out in the London Plan.

4.4. Gypsies, Travellers and Travelling Show People

Record of agreement

4.4.1.LBHo was part of the West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSA) in 2019, undertaken by Opinion Research Services (ORS). The assessment uses the PPTS definitions to provide a robust revised assessment of current and future need for Gypsy and Traveller accommodation in the borough for the period 2016-2041. It identifies a need for 7 Gypsy/Traveller pitches, of which 3 are needed in the next 5 years, and 18 travelling show-people plots, of which 10 are need in the next 5 years. Regarding the need for Travelling Showpeople, 3 of the 18 Travelling Showpeople plots are existing unauthorised plots which will be protected and safeguarded by LB Hounslow thereby leaving a total of 15 Travelling Show-people plots to be provided over the plan period. The Plan allocates sites to meet the five-year need of both communities.

4.4.2.LB Hill undertook its own Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSA) in 2017, undertaken by Opinion Research Services (ORS). The assessment uses the PPTS definitions to provide a robust revised assessment of current and future need for Gypsy and Traveller accommodation in the borough for the period 2017-2032. The Local Plan: Part 2 allocates sites and provides policies to address the needs identified in this document.

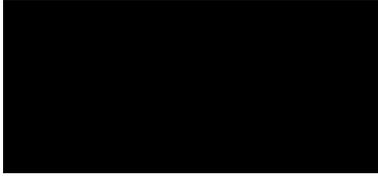
5. Governance Arrangements

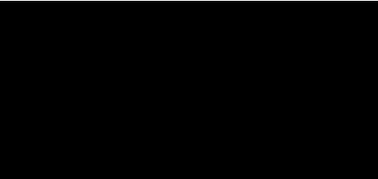
5.1.1.It is agreed that informal discussions will occur between both parties on the cross boundary issues referred to in this Statement of Common Ground in the form of officer level meetings at least once every twelve months, with reporting of matters to Member level if necessary. This is in addition to the opportunities for inter-borough discussion of strategic matters provided by the three meetings each year of the WLA Chief Planners' and quarterly meetings of the Planning Policy Officers' groups.

5.1.2.It is agreed that this Statement of Common Ground will be reviewed by both parties at a joint duty to cooperate meeting which will be held on an annual basis.

6. Signed confirmation

6.1. The contents of this Statement of Common Ground are agreed for the purposes of the LB Hounslow WoB Local Plan Review.

Signed on behalf of LB Hillingdon		
Name and position	Signature	Date
Cllr Keith Burrows Cabinet Member for Planning, Transportation and Recycling		12/10/2020

Signed on behalf of LB Hounslow		
Name and position	Signature	Date
Cllr Steve Curran Leader of the Council Cabinet Member for Corporate Strategy, Planning & Regeneration		04/12/20

Appendix 3



HILLINGDON
LONDON

The Spatial Planning Team
London Borough of Hounslow
Hounslow House
7 Bath Road
Hounslow
TW3 3EB

Date: 19th August 2020

Dear Danalee Edmund

Re Updated Response - Local Plan Review Consultation (Regulation 19) - West of Borough Plan and Site Allocations

I write further to the Council's consultation response to the West of Borough Plan (WoBP) that was submitted in September 2019 and our subsequent meeting in February 2020. The following is an updated response that takes into account material changes that have occurred since the Regulation 19 consultation took place.

It is noted that this updated response has been submitted outside of any official consultation period. However, the Council believes it is necessary to provide such a response in the interests of constructive engagement so that the London Borough of Hounslow is afforded a clear position prior to deciding whether to submit its plan. Officers have also written this alongside a draft Statement of Common Ground (SoCG) to indicate areas of agreement.

The material changes referred to above include:

- The Civil Aviation Authority's publication of CAP 1871. (December 2019)
- The Court of Appeal declaring that the Government's Airports National Policy Statement (ANPS) was unlawful. (February 2020)
- The economic impact of the COVID-19 pandemic and the need for expansion being contingent on the economy recovering after the pandemic

Planning Policy, Residents Services
London Borough of Hillingdon,
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This response has also taken into account the updated background/evidence documents that have recently been provided to the Council.

1.0 Interaction with the Proposed Expansion of Heathrow Airport

1.1 The previous response outlined that due to the uncertainty and inconsistencies created by both the ANPS and Heathrow Airport Limited's (HAL's) Preferred Masterplan, strategic planning for the area around Heathrow was plainly impossible until such a time as the ANPS was corrected, or the project and its impacts were known through the submission of the development consent order (DCO) application.

1.2 Since this response, there have been three significant material changes that impact the proposed expansion of Heathrow Airport. It is considered that these three material changes have significantly altered the position for those involved in plan-making. In particular, there is no lawful basis on which to give weight to expansion at Heathrow airport and no realistic prospect of a third runway being delivered during the plan period up to 2034. In the event that this position did change, it is noted that there is a legal requirement for all local plans to be reviewed at least every five years under Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012). A review within five years or less would therefore provide a mechanism for reevaluating site allocations if necessary.

1.3 It is noted that this would also align with the approach of the Heathrow Strategic Planning Group (HSPG) who, through their Position Statement (March 2020), share the Council's view that the material changes outlined above requires a fundamental review of the strategic approach to planning around Heathrow.

1.4 On this basis, previous concerns around the WoBP not representing a coherent and deliverable plan when read in the context of the now unlawful ANPS or HAL's Preferred Masterplan have diminished. However, it is considered that there is a fundamental issue with parts of the evidence/justification for the WoBP still being made on the premise of airport expansion. The plan should be clear from the outset that it is now operating on an 'expansion off' scenario. Should there be a change to national policy so that there is a lawful strategic plan for support of Heathrow expansion then this should be addressed through an early review of the WoBP plan. It is inappropriate to develop a plan that accommodates or supports Heathrow

expansion as this has significant consequences for the local environment and communities.

1.5 Of particular concern, is the justification for Green Belt release and inappropriate new sites for office parks being explicitly linked to the possibility of airport expansion and the resulting increased development requirements for industrial and office floorspace. These concerns are outlined in more detail below.

2.0 Proposed Loss of Green Belt

2.1 The previous response outlined that there were strategic level concerns with the overall scale of the proposed Green Belt release. It is still considered that the release proposed by the London Borough of Hounslow will further reduce the wider strategic contribution the adjoining parts of Hillingdon's Green Belt can make to London's Green Belt. Whilst these concerns were amplified by the prospect of additional releases associated with the proposed expansion of Heathrow Airport, the proposed loss of Green Belt through the WoBP is still considered to be unsound. At the specific site level, there is still concern about the proposed loss of sites on the shared boundary that have been identified as performing strongly or moderately against the Green Belt purposes in the Part 2 Green Belt Review.

2.2 This updated response also has the benefit of being able to consider the Regulation 19 consultation responses to the WoBP submitted by the Mayor of London. These concluded that, as currently drafted, the WoBP is not in conformity with the current or draft new London Plan, in part due to the proposed release of Green Belt. In terms of the strategy for new office floorspace, the need for the proposed quantum is questioned (even prior to any proposed expansion of Heathrow Airport) and their locations on out of centre greenfield sites not listed in Policy E1 are deemed to be inappropriate. In terms of the strategy for new industrial floorspace, the approach of releasing Green Belt to meet industrial demand is also not deemed to be necessary.

2.3 Whether the WoBP's departure from the Spatial Development Strategy (SDS) in relation to office and industrial floorspace are justified or not are matters that will undoubtedly be tested through the Examination in Public (EiP) by the Mayor of London and London Borough of Hounslow. It should be noted however that, if the conclusion is that either the need or strategies for meeting the need are not justified, then it is self-evident that the three specific site allocations referred to below cannot be sound either.

2.4 The previous response also questioned how a modelled scenario with Heathrow Airport expansion had been taken into account when developing the Plan. This modelled scenario resulted in a higher need for both office and industrial floorspace. Further clarity has been provided on this from the draft Employment Land

Review Update provided by Stantec and discussions with the Council. It is clear that in an 'expansion off' scenario, the WoBP would result in significant surpluses of the industrial and office floorspace against the need figures produced by the London Borough of Hounslow. Noting the comments in Section 1 of this response, an 'expansion off' scenario is deemed to be the only one the WoBP should be planning for.

Industrial Floorspace

2.5 In terms of industrial floorspace, there is an overprovision of 87,848 sqm being proposed against the locally identified need for development. This overprovision will primarily be delivered through the release of Green Belt and it is not clear how exceptional circumstances could be demonstrated in such a scenario. Consequently this approach would appear to be inconsistent with Paragraph 137 of the NPPF (2019), which is clear that examination of exceptional circumstances should relate to 'identified need for development'. One set of exceptional circumstances being put forward relates to being able to cater for long-term needs beyond the plan and the possibility of Heathrow expansion. As outlined in Paragraph 1.5, if this scenario was to arise, there would need to be an early review of the local plan and SDS to take into account the full implications of this scenario. An additional set of exceptional circumstances suggests that the release of a substantial quantum of Green Belt is required to ensure the permanence of the remaining Green Belt boundary. This is considered to be circular reasoning, particularly when you take into account the scale of the release and the weakening it would cause to the remaining Green Belt. Furthermore, it can only hold weight as an approach when the release of areas of Green Belt can be justified in the first instance.

Land South of Western Internal Market

2.6 As previously outlined, there are concerns regarding the proposed release of site SA-1A (RA-1A) to the east of the A312 which would remove a continuous extent of Green Belt from Heston to the north of Cranford Park, which currently provides a separation between built developments in the two boroughs. These concerns remain pertinent. Hillingdon Council does not agree that the site currently makes a less important contribution to the wider strategic Green Belt. Its release would result in only a very narrow strip of remaining Green Belt land to the west of the A312, thus impacting the purposes of this land and the shared area of Green Belt that exists between the two local authorities. The Green Belt Review also concludes that the site performs moderately when viewed in isolation.

2.7 The site has been allocated as Land South of Western International Market (Site Ref: 77) for mineral extraction, with redevelopment to industrial uses in the long term. Officers would note that mineral extraction is not inappropriate in the Green Belt, subject to it being undertaken in a manner that preserves the site's openness. The site therefore does not need to be released from the Green Belt to justify this

function. Officers also retain the view that the assertion that it needs to be restored for 15,800 sqm industrial uses in the long term is unjustified, particularly in light of the comments in Paragraph 2.5. The site should therefore remain as Green Belt and any required restoration from minerals extraction should be undertaken in a manner that preserves and enhances the site's openness.

Airport Business Park

2.8 The previous response also outlined concerns with the allocation of the Airport Business Park (Site Ref: 57) and its release from the Green Belt. Part of these concerns originally related to conflicts with HAL's Preferred Masterplan, specifically the re-provision of an immigration removal centre. Noting the revised 'expansion off' scenario that the plan should be operating under, the concern about this conflict is no longer considered relevant.

2.9 However, noting the Green Belt Review's conclusion that the site is still performing moderately well, the position remains that the release of this site from the Green Belt is unjustified. This view is held particularly in light of the comments made regarding overprovision in Paragraph 2.5.

Office Floorspace

2.10 In terms of office floorspace, there is an overprovision of 54,280 sqm being proposed against the locally identified need for development. Again, this overprovision will be met through the release of Green Belt,

Heathrow Gateway

2.11 In particular the Council is concerned about the allocation of The Heathrow Gateway (Site Ref: 38). This approach is again viewed as likely to be inconsistent with Paragraph 137 of the NPPF (2019), which is clear that examination of exceptional circumstances should relate to 'identified need for development'. One set of exceptional circumstances being put forward relates to being able to cater for long-term needs beyond the plan. As previously stated, any potential change in long-term needs should be revaluated when necessary through a review of the plan, so that all strategic options could be reassessed. Another set of exceptional circumstances suggest that surplus land must be released in case there is a shortfall in demand for office floorspace during the Plan period. It is unclear how a potential shortfall in demand creates a need to over provide office floorspace.

2.12 As outlined in the previous response, the Heathrow Gateway site (Ref: 38) and its release from the Green Belt are not deemed to be appropriate. The Green Belt Review concluded that it made an important contribution to the wider strategic Green Belt and performed strongly against other Green Belt purposes. The site is therefore not recommended for release. The site's allocation for office floorspace is particularly unjustified in light of the comments in Paragraph 2.10. Whilst it is noted

that the site is being 'safeguarded only', the decision to release it from the Green Belt would clearly be a permanent one and therefore the exceptional circumstances behind its release must still exist at the time when this plan is assessed.

2.13 It should be noted that there were additional concerns in relation to conflicts with HAL's Preferred Masterplan, notably around Mayfield farm. This concern is removed when operating under the correct 'expansion off' scenario.

2.14 This updated response also has the benefit of being able to consider the Regulation 19 consultation responses submitted by the Mayor of London. They object to the site allocation on the grounds that it would be outside of a town centre and that TfL does not support the Southern Rail Link through this location. The Council shares these views noting that the locations outlined in Policy E1 of the new London Plan are considered to be sound.

3.0 Heathrow Opportunity Area

3.1 As outlined above, the London Borough of Hillingdon remains concerned about the number of jobs and homes that have been allocated on specific sites, but have a high risk of not being delivered. This would have a significant impact on the overall capacity that the WoBP could make to the indicative capacity figures in the new London Plan for the Heathrow Opportunity Area. As such, it will not be possible to agree the capacity for growth that exists in the Heathrow Opportunity Area until after the conclusion of the Examination in Public for the WoBP. This approach is considered to be sound on the basis that the new London Plan outlines indicative capacities only and it is for the local plan process to establish the true capacity of individual Opportunity Areas. These indicative capacities therefore differentiate from tested targets in the SDS, such as the ten-year housing targets.

3.2 The London Borough of Hillingdon can confirm that they raise no objection at this stage to the boundary that has been defined through the WoBP.

4.0 Highways Impacts

4.1 A final area of concern for Hillingdon Council is the potential impact on the surrounding highway network. It is acknowledged that in an 'expansion off' scenario the cumulative impacts will be lessened. However, it is still unclear how the proposed growth scenario can be brought forward without greater certainty on the southern rail access to Heathrow, on which much of the increase in capacity relies. Southern rail access, like Heathrow expansion, benefits from no formal planning position which should attract weight in plan-making.

5.0 Planning Policy Update

5.1 It is also noted that there have been other material changes to planning policy since the previous response. One area identified as a strategic matter between both local authorities is Gypsies, Travellers and Travelling Show People accommodation. The Inspector's Report for the new London Plan has concluded that the definition of gypsies and travellers should be consistent with national policy. To this extent, it is considered that the national definition should be implemented in regards to addressing this strategic matter in plan-making moving forward.

5.2 Another area of change is the very recent announcement that the Use Class Order will be amended. Whilst there will not have been an opportunity to date to amend the site allocations accordingly, it is considered that this will be necessary as and when it is possible to do so.

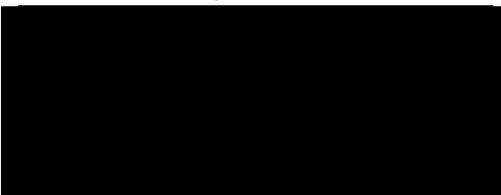
6.0 Conclusion

6.1 It is considered that significant material changes have taken place since the Regulation 19 Consultation which have justified an updated position. Hillingdon Council is grateful for the ongoing engagement from Officers at the London Borough of Hounslow and the additional information that has been provided. However the Council maintains the position that the WoBP is unsound as currently drafted and requires significant modifications beyond what is being proposed. In particular, the following three site allocations are considered to be unjustified and in consistent with national policy, particularly in regards to Green Belt:

- The Heathrow Gateway (Site Ref: 38)
- the Airport Business Park (Site Ref: 57)
- Land South of Western International Market (Site Ref: 77)

If the WoBP is submitted, Officers anticipate that the issues outlined in this response will need to be discussed through the EiP. Attached is a revised draft Statement of Common Ground which covers perceived records of agreement between both local planning authorities. We request all future correspondence continues to be sent to our Planning Policy Manager - Julia Johnson jjohnson2@hillington.gov.uk and localplan@hillington.gov.uk

Yours sincerely,



Cllr Keith Burrows

Cabinet Member for Planning, Transportation and Recycling

Appendix 4

STATEMENT OF COMMON GROUND

Between LB

Hounslow

and

Royal Botanic Gardens, Kew and LB Richmond upon Thames

December 2020

1 Introduction

- 1.1. This Statement of Common Ground has been prepared between LB Hounslow (LBH) and Royal Botanic Gardens, Kew (RBGK) and LB Richmond upon Thames (LBRuT). It seeks to help inform the independent examination of Hounslow Local Plan Reviews (Great West Corridor and Site Allocations only).
- 1.2. It sets out where issues have been resolved and identifies areas where agreement has not been reached.

2 Background

- 2.1. The duty to cooperate places a legal duty on local authorities, amongst other bodies, to engage constructively on an ongoing basis to help maximise the effectiveness of the preparation of plans. Formal engagement took place through the three public consultations on the Local Plan reviews and in meetings in between these consultation events, mainly to discuss the GWC Masterplan and Capacity Study (2020) and GWC Masterplan and Capacity Study – Appendix Views Testing (2020), which are key evidence to inform the policies in the Draft Great West Corridor Local Plan Review (Volume 4) and some of the development proposals in the Draft Hounslow Site Allocations (Volume 2).
- 2.2. All parties met under Duty to Cooperate to discuss and seek to resolve the main issues raised at formal Regulation 19 consultation.

- 2.3. RBGK's and LBRuT input into the review process has solely focussed on the location, design and height of proposed developments in the GWC area. Areas of agreement and disagreement are therefore limited to:

Local Plan Review Vol 4:

- Policy GWC5 Design and Heritage
- Policy P1 Great West Corridor West
- Policy P2 Great West Corridor Central
- Policy P3 Great West Corridor East

GWC Masterplan and Capacity Study:

- Sections 2.1 and 2.4
- Sections 7.1, 7.2, 7.5, 7.6, 7.7
- Appendix A
- Appendix B
- Appendix C

3 Matters on which the Parties agree

- 3.1. It is agreed that LBH, RBGK and LBRuT have engaged with one another in relation to the impact of tall buildings within the GWC area on the Royal Botanic Gardens, Kew World Heritage Site (WHS) and designated heritage assets within it.

- 3.2. It is also agreed that LBH have appropriately engaged with RBGK and LBRuT under the duty to cooperate and have sought to respond matters raised by RBGK and LBRuT.
- 3.3. It was agreed during consultation that the supporting evidence base documents GWC Masterplan and Capacity Study (2020) and GWC Masterplan and Capacity Study – Appendix Views Testing (2020) needed to be strengthened by outlining the significance of heritage assets in and around the corridor and ensuring that the approach used in the assessment of potential impacts was consistent with Historic England Guidance (Good Practice Advice in Planning - Note 3 - The setting of Heritage Assets (Second Edition). December 2017).
- 3.4. It was agreed during consultation that Policy GWC5 (Design and Heritage) should be amended to strengthen and clarify the wording.
- 3.5. It is agreed that Table 1 below identifies the main issues raised during the final round of consultation in January 2020 and in follow-on discussions. Inclusion in the table does not indicate that all parties have agreed that LBH's responses / actions are accepted:

Table 1: Summary of Main Issues and LBH Response / Action

Summary of Main Issues	Relevant Policy Point	Respondent	LBH Response / Action
Consented/existing tall buildings should not be used a precedent where these cause harm to heritage assets.	GWC5	Richmond, Kew Gardens	The existing tall buildings on the corridor have not been used as a precedent, rather we have had to account for them on our modelling to also look at
There is an assumption that harm to heritage assets is acceptable and inevitable.	GWC5	Richmond, Kew Gardens, Community Groups	Noted, we have amended the text of GWC to ensure the intentions of the policy are clear.
The policy states that proposals should avoid further harm to Kew, however this is contradicted by the inclusion of focal buildings, such as proposals for the Citadel Site, which have been shown to cause harm to Kew.	GWC5	LB Richmond, Kew Gardens	The modelling demonstrates that the focal buildings will not be visible in the main views from Kew.
Building to the heights specified, particularly focal buildings, may cause further harm to RBGK WHS and designated assets within it.	GWC Supporting	Kew	We have a robust methodology which follows guidance and we have done extensive modelling to demonstrate the impact of the proposed heights on heritage assets We will include an appendix in the masterplan which will provide more information on the

3.6. Parties agree that Table 2 below sets out modifications made by LBH in relation to matters raised by the parties. Inclusion in the table does not indicate that all parties have agreed that the Proposed Modifications are acceptable.

Table 2: Proposed Minor Modifications

Item	Summary	Proposed modification
1	There is an assumption that harm to heritage assets is acceptable and inevitable, therefore Policy GWC5 should be strengthened	<p>f) Conserve, restore and enhance designated and non-designated heritage assets and their settings, giving great weight to the assets' conservation. Harm of any measure should be avoided in the first instance. No harm is the ideal. Where applicants can demonstrate and adequately document there is no viable option for a site other than to devise proposals which lead to harm it will be assessed as follows:</p> <ul style="list-style-type: none"> i. Where there is less than substantial harm, this harm will only be justifiable if it is outweighed by public benefits of the proposals including, where appropriate, securing a heritage assets optimal viable use. ii. Substantial harm- consent will be refused unless it can be demonstrated that the harm was necessary
2	Supporting text should also make reference to NPPF legislation	<p>4.69 The legislation is supported by the NPPF where there is a presumption in favour of sustainable development and the desirability of new development making a positive contribution to local character and distinctiveness (Paragraph 185). Paragraph 193 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The NPPF also sets out at paragraph 194 that substantial harm to Grade II heritage assets should be exceptional. For any</p>
3	Building to the heights specified particularly focal buildings may cause further harm to the historic environment	<p>h) Respond to the area's sensitive heritage assets and important views and accord with Great West Corridor Masterplan heights and design framework which identifies:</p> <ul style="list-style-type: none"> I. general building height parameters of 12 to 24 metres where appropriate to the local context II. clusters of (modestly scaled) tall buildings generally grouped around the focal buildings and ranging between 30 and 42 metres high (up to 65.5m AOD) at Tesco Cluster (CL1); between 36 and 45 metres high (up to 61.5m AOD) at West Cross Campus (CL2); between 38 and 43 metres high (up to 51.2m AOD and 45.1m AOD at River Brent cluster (CL3); up to 42 metres high (up to 54.1m AOD) at London Gateway Cluster (CL4); between 36 and 45 metres high (up to 53.7m AOD) at Brentford Stadium West Cluster (CL5); and between 34 and 45 metres high (up to 55.5m AOD) at Brentford Stadium East Cluster (CL6) as shown on figure 4.10

Item	Summary	Proposed modification
		LH2: up to 33 metres high (up to 43.4m AOD) FB2 (Brent River Gate) – up to 46 metres high (up to 53.2m AOD); FB3 (Mille site/London Gateway Anchor) – up to 68 metres high (up to 80m AOD); FB4 (Phoenix site) – up to 48.5 metres high (up to 60m AOD); FB5 (Lionel Road station) – up to 53.5 metres high (up to 62m AOD); FB6 (Capital Interchange Way) – up to 51.5 metres high (up to 62m AOD); FB7 (Citadel site) – up to 50 metres
4	Setting the scene section should include more information on the historic character of the Corridor and its surroundings.	Text added to 'Setting the Scene' section: The area has a rich heritage, ranging from former industrial building to great estates. The 'Golden Mile' itself is peppered with significant listed art deco buildings including the landmark former Gillette factory and the JC Decaux offices. The listed and non-designed heritage assets in the area contribute to its character and reflect the past development of the area. Outside of the Golden Mile are a number of important houses such as Boston Manor House. While not inside the corridor, the World Heritage Site, Royal Botanic Gardens Kew, and Kew Green Conservation Area, the wider Arcadian Thames and the historic waterfront of Strand on the Green's Conservation Area are part of the diverse range of heritage assets surrounding the area. Potential developments will need to account for these important heritage assets and their setting in any proposals, giving great weight to the assets'

3.7. In relation to Table 2, the proposed modifications for Items 1, 2 and 4 are agreed by all Parties.

3.8. In relation to the GWC Masterplan and Capacity Study, RBGK agree with the content of Sections 2.1 and 2.4.1. RBGK broadly agrees with the Illustrative Masterplan in Section 7.1 and Land Use information in Section 7.2, excepting comments on particular building locations and heights (see Section 4 below). RBGK notes the content of Section 7.5.3 as a factual statement of work undertaken for the Masterplan and Capacity Study. RBGK agrees with the General Building Heights identified in Section 7.6.

3.9. In relation to the GWC Masterplan and Capacity Study, RBGK agree with the content of Sections 2.1 and 2.4.1. RBGK broadly agrees with the Illustrative Masterplan in Section 7.1 and Land Use information in Section 7.2, excepting comments on particular building locations and heights (see Section 4 below). RBGK notes the content of Section 7.5.3 as a factual statement of work undertaken for the Masterplan and Capacity Study. RBGK agrees with the General Building Heights identified in Section 7.6.

4 Matters of outstanding concern

4.1. While RBGK broadly supports the Great West Corridor Local Plan Review and is largely in agreement with its vision, policy and objectives there are a small number of matters where no agreement has been reached:

Great West Corridor Local Plan Review – Vol 4

4.2. Policy GWC5 Design and Heritage is not agreed in its entirety – the key area of disagreement is:

A. GWC 5(h)III – includes focal buildings which may be visible from RBGK WHS, in conflict with GWC 5(i) and supporting paragraph 4.63 (see below for further detail)

4.3. The clusters and buildings identified in GWC 5(h)III are also listed in Policy P3 Great West Corridor Central. This policy is therefore not agreed.

4.4. Table 3 - Tall building clusters and focal tall buildings of concern:

Reference	Issue
CL6 and FB6	<p>There is a risk that FB6 will appear over the roof of the Orangery from views on the Great Lawn. This would be harmful to the OUV of the WHS and contrary to Policy GWC5 and the adopted Management Plan (2020).</p> <p>RBGK consider that the heights should be slightly reduced to minimise this risk</p> <p>This issue also applies to Policy P3 Great West Corridor East</p>

Reference	Issue
FB7	<p>RBGK does not agree that it is acceptable to include a proposal for the Citadel site (FB7) that could be visible from within the Gardens. Such a proposal would harm the OUV of the WHS and would be contrary to Policy GWC5 and the adopted Management Plan (2020).</p> <p>RBGK consider that the height needs to be amended to entirely avoid the risk of harm – rather than an approach which seeks to move mass around on the proposed site</p>

GWC Masterplan and Capacity Study

4.5. Table 4 below summarises the key areas of disagreement in relation to the GWC Masterplan and Capacity Study:

Table 4: Areas of disagreement in Masterplan and Capacity Study

Section 7.7	<p>RBGK does not agree with heights proposed for some of the tall buildings, clusters and focal buildings on Figures 7.23 and 7.24 and in Sections 7.7.5 and 7.7.6 (see Table 3 above</p>
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Appendix A	<p>RBGK does not agree with heights proposed for some of the</p> <p>tall buildings, clusters and focal buildings in Appendix A (see</p>
Appendix B	<p>RBGK does not agree that Appendix B provides an adequate</p> <p>assessment of potential impacts on the WHS as this does not reflect ICOMOS guidance on Impact Assessments or Historic England guidance on setting</p>
Appendix C	<p>RBGK does not agree that Appendix C provides an adequate</p> <p>assessment of potential impacts on the WHS as this does not reflect ICOMOS guidance on Impact Assessments or Historic England guidance on setting</p>

5 Signed confirmation

5.1. The contents of this Statement of Common Ground are agreed for the purposes of Hounslow Local Plan Review examination

Signed on behalf of Hounslow Council		
Name and position	Signature	Date
Peter Matthew Executive Director, Housing, Planning and Communities		14.12.2020

Signed on behalf of Royal Botanic Gardens, Kew		
Name and position	Signature	Date
Georgina Darroch WHS Coordinator, RBG Kew		11.12.2020

Signed on behalf of LB Richmond upon Thames		
Name and position	Signature	Date
Jenifer Jackson Assistant Director – Planning & Transport Strategy		14.12.2020

Appendix 5

LB Hounslow Local Plan Reviews

Statement of Common Ground

Between

London Borough of Hounslow

And

The Mayor (Greater London Authority)

May 2021

1. Introduction

- 1.1 This Statement of Common Ground (SCG) has been prepared between the London Borough of Hounslow (LBH) and The Mayor of London (The Mayor). It seeks to help inform the independent examination of LBH's Draft Vol.2 Site Allocations, Draft Vol.3 West of Borough (WoB) Local Plan Review, and Draft Vol.4 Great West Corridor (GWC) Local Plan Review, which have been submitted to the Planning Inspector. The SCG sets out both parties' agreed positions in relation to strategic cross boundary matters identified.
- 1.2 Hounslow has been working closely with the Greater London Authority (GLA) and other statutory bodies such as Transport for London (TfL) in the production of the draft Local Plan Review and strategic infrastructure delivery matters. The GLA and TfL have responded to the LBH's consultations, and meetings and workshops were held in the context of the Regulation 18 (preferred options) and the Regulation 19 consultation stages.

Background

- 1.3 The London Plan 2021 is the published Development Plan for London. It is the statutory Spatial Development Strategy for Greater London prepared by the Mayor of London ("the Mayor") in accordance with the Greater London Authority Act 1999 ("the GLA Act") and associated regulations. The London Plan sets out an integrated economic, environmental, transport and social framework for the development of London over the period of 20-25 years. Procedure Guide for Local Plan Examinations (June 2019) states that in London, confirmation that the Mayor has indicated general conformity with the London Plan should be sought, however the Inspector is entitled to take his/her own view on conformity.
- 1.4 The strategic matters this SCG covers are set out below, for each providing a summary of the key evidence base findings and a record of where agreement has been reached:
- Health & Wellbeing (Policies GWC3 & WoB3)
 - Design and Heritage (Policies GWC5 & WoB5)
 - Connecting People & Places (Policies GWC6 & WoB6)

1.5 The following strategic matters are not included in this SCGs, as different positions remain at this stage. Unless resolved, this will be set out in detail in the respective Written Statements to inform the Examination:

Employment Growth (Policies GWC1 & WoB1)

- The Mayor is concerned by the industrial/office floorspace proposed to be located in the Green Belt.
- The Mayor considers it has not been robustly demonstrated that to avoid Green Belt loss, existing industrial sites cannot be intensified further and that – not withstanding that principle - industrial development on Green Belt land at the proposed very low densities would only facilitate urban sprawl and fail to make the best use of land.
- LBH considers that the evidence base robustly demonstrates that existing industrial sites cannot be intensified further to the extent that the proposed Green Belt releases would not be necessary to meet the identified requirement¹. LBH considers that evidence base supports the densities proposed². Further, it considers that the densities are based on minimum development quanta which have resulted from a masterplan-led approach which takes account of nearby green infrastructure assets as well as a range of on-site constraints, including height restrictions due to the proximity of Heathrow.
- The Mayor considers that it is vital to make town centres more attractive, and therefore office development should be supported in town centres and through the intensification of existing business parks alongside improvements to sustainable transport capacity rather than in a new out-of-centre office park on Green Belt land.
- LBH agrees that office development should be supported in town centres and through the intensification of existing business parks but, beyond the

¹ See documents: EMP03 Section 3, paras 3.6-3.88; EMP04 Appendix A; GS07 paras 4.43-4.52; and EMP02 paras 6.4-6.13.

² See document EMP03 paras 3.53-3.57 and 3.95-3.96. In the case of the sites in the West of the Borough which the ELR Update recommends could be tested for multi-floor formats, there are height restrictions in place, due to the proximity of Heathrow Airport, which limit the scope for this.

site allocations proposing new office and workspace floorspace in the GWC and elsewhere, considers that the evidence base demonstrates that this is not a deliverable option³. The Council believes that the opportunity to deliver strategic transport infrastructure to serve the Heathrow Gateway site represents exceptional circumstances justifying the release of this land from the Green Belt. Were this site to then come forward, a number of sustainability benefits would result, including the provision of offices which would enable the borough to meet both its full quantitative office requirement and the qualitative need for new modern campus-style offices.

Housing Growth (Policies GWC2 & WoB2)

- LBH should demonstrate that exceptional circumstances are fully evidenced and justified to support the release of Green Belt to deliver the housing target. The Mayor is particularly concerned by assumptions around the lack of availability and viability of sites in the Site Allocations and Capacity Assessment.
- In accordance to national guidance LBH have carried out extensive Housing and Economic Land Availability Assessment (HELAA), known as the Site Allocations and Capacity Assessment (SACA). The study engaged in an extensive approach to the assessment of availability by pro-actively reaching out to landowners of sites and requisitioning detailed title information from the Land Registry in order to establish the existing lease conditions on sites, in order to further support robust assumptions regarding availability of sites to come forward in the plan period. LBH considers that assumptions regarding lack of availability are robust and reflect a true assessment of site availability.
- LBH carried out a detailed Viability Assessment in order to inform plan preparation and to ensure the policies and development proposals in the Plans are viable. This assessment tested certain strategic sites and presented a typology-based approach which indicates the levels of viability across the borough and providing background assessment of the viability of residential and non-residential developments. LBH consider that

³ See document EMP03 paras 3.53-3.57 and 3.95-3.96. In the case of the sites in the West of the Borough which the ELR Update recommends could be tested for multi-floor formats, there are height restrictions in place, due to the proximity of Heathrow Airport, which limit the scope for this.

assumptions regarding viability are robust and reflect, at a high level the likely viability of certain types of development.

- LBH has sought to optimise housing delivery through the Local Plan Reviews within the urban form and has identified over 94% of its needs for housing in the plan period on such sites. However, in order to meet objectively assessed need, it considered that a few poor performing green belt sites are appropriate in helping to meet this need, and that there are exceptional circumstances for release sites to meet this need, as set out in the Exceptional Circumstances background paper, at paragraphs 4.59-5.2⁴.

Green Belt, Metropolitan Open Land and Open Space (Policies GWC4 & WoB4)

- LBH should demonstrate that exceptional circumstances are fully evidenced and justified to release the Green Belt for residential, offices and industrial land.
- LBH considers that exceptional circumstances have been demonstrated for the release of Green Belt land as proposed in the plan in accordance to the NPPF. These are set out in full in the evidence base.
- The Mayor questions the re-designation of Green Belt as Metropolitan Open Land.
- LBH is proposing the re-designation of some Green Belt land as Metropolitan Open Land (MOL) as the preferred option following the recommendations of the Green Belt Assessment⁵. Notwithstanding this LBH also set an Option B which is to retain as Green Belt, if the preferred option recommendation is not taken up as a result of the examination process, LBH would request the inspectors to recommend a modification to the plan and policies map which would have the effect of retaining this land within the Green Belt.

⁴ See docs [GS05 LBH LPR Exceptional Circumstances Background Paper \(Reg 19 Version\)](#) and [GS07 LBH LPR Exceptional Circumstances Background Paper \(Submission version\)](#)

⁵ See docs [GS01 LBH Green Belt Review Stage 1 \(2015\)](#) and [GS03 LBH Green Belt Review Stage 2 \(2019\)](#)

2. Strategic Geography

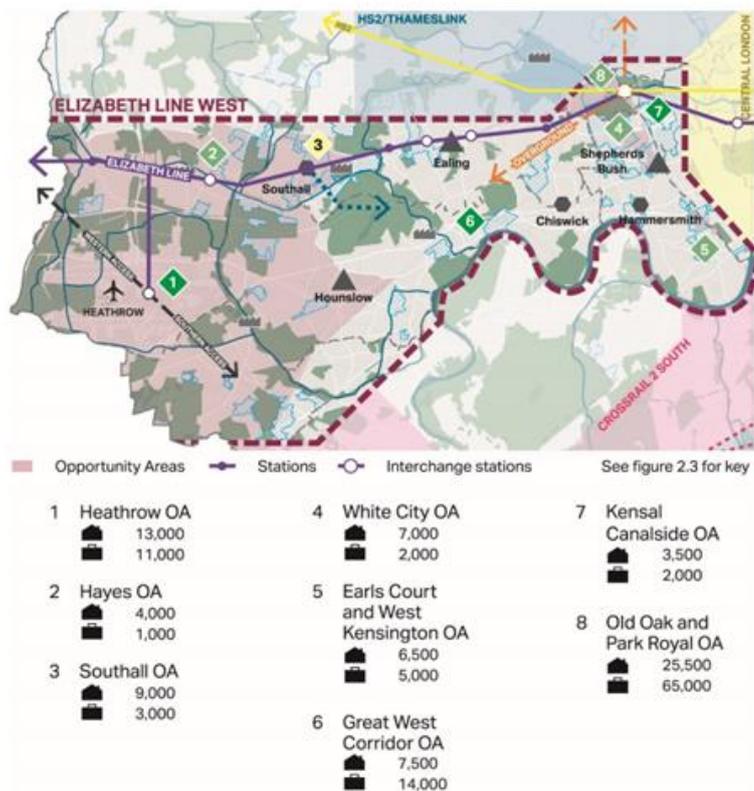


Figure 1: Extract from 'Elizabeth Line West' growth corridor diagram, London Plan 2021

2.1 The map above (figure 1) is an extract taken from the London Plan and shows the Heathrow Opportunity Area (OA) and the Great West Corridor Opportunity Area (GWCOA) within the Elizabeth Line West Growth Corridor. The diagram indicates the general location of the OAs and describes the strategic geography considered for cooperation on strategic matters as part of this SCG.

3. Strategic Matters and Record of Agreement

3.1. Health & Wellbeing (GWC3 & WoB3)

Background/Evidence Base Findings

3.1.1. Air Quality and Noise background papers for the GWC and WoB plan areas have been prepared to review the draft GWC3 and WoB3 policies. These set out recommendations for detailed design phase and other mitigation measures demonstrating that the policies are appropriate, are in line with the latest best practice guidance and will ensure that development will respond to noise and air quality impacts given the particularly high levels of pollution within the study areas.

3.1.2. The key outputs of the studies are:

- A review of the relevant international, national, regional and local policy context and legislation;
- Air quality mapping and identification of high concentrations of pollutants within the study areas;
- Summaries of the air quality and noise constraints and opportunities at allocated sites, as well as detailed guidance on design phase and other mitigation measures to be explored;
- Noise modelling for the allocated sites within the areas to consider the effects of different interpretations of the draft policy; and
- Proposed Interpretation of the draft policies to identify any implications for future development within each allocated site, which will feed into emerging supplementary planning guidance.

Record of Agreement

3.1.3. The parties agree with the objectives set out in the Air Quality and Noise background papers which seek to identify the implications of draft policies on future development within the allocated sites.

3.1.4. The Mayor welcomes the Local Plan review policies that aim to minimise exposure to noise and poor air quality and considers more detailed policy guidance is needed on how developments should respond to noise and air

quality given the presence of Heathrow airport and the Great West Road and M4 in the borough.

- 3.1.5. LBH will use the findings in the background papers to feed into emerging Supplementary Planning Guidance (SPG) which will help to guide development in responding more effectively to noise and air quality impacts.

3.2. Design and Heritage (GWC5 & WoB5)

Background/Evidence Base Findings

- 3.2.1. The Great West Corridor Masterplan was informed by guidance from Historic England, as well as engagement with Royal Botanical Gardens Kew, LB Richmond Upon Thames and GLA officers. This has resulted in the development of a detailed and robust methodology which has been used to establish an appropriate building height for each tested location which is deemed to be acceptable in respect of the individual and cumulative impacts upon heritage assets in the context of the comprehensive re-development and regeneration of the Great West Corridor area.
- 3.2.2. The Views Assessment work carried out as evidence for the Great West Corridor Masterplan has shown that tall buildings (with height parameters as defined by the heights framework) can enable LBH to meet its housing and other strategic targets while protecting the significance of adjacent heritage assets, acknowledging that in the case of Kew Gardens any further harm would be unacceptable given the level of harm there already being near substantial in accumulation. Harm to other assets is not supported by LBH, but it is recognised the NPPF allows for less than substantial harm if public benefits outweigh that harm. The Council acknowledges that this is an exacting test to meet. In accordance with this ethos the Council's approach would result in no further harm to the Royal Botanic Gardens, Kew UNESCO World Heritage site.

Record of Agreement

- 3.2.3. The Mayor supports the masterplanning approach LBH has used to inform the form of the development along the Great West Corridor. This has provided

the basis of the Place policies. The Mayor welcomes the certainty that these design policies provide, especially the indicative heights.

- 3.2.4. LBH and The Mayor agree that any harm to heritage assets should be considered against public benefit, in accordance with the relevant tests in the NPPF.
- 3.2.5. Both parties agree that the amendments made to the Draft Submission Local Plan Review policies GWC5 and WoB5 regarding public benefit are needed for sense and clarity.
- 3.2.6. Both parties agree that the amendments made to the supporting text of the Draft Submission Local Plan Review policies GWC5 and WoB5 regarding tall buildings are needed to align with London Plan Policy D9 on Tall Buildings⁶. Further amendments required are included as Appendix 1.
- 3.2.7. The Mayor welcomes the proposed design policies in both draft Local Plan reviews, including Hounslow's aim to prepare design codes and make good use of its Design Review process in accordance with Policy D4D of the London Plan.

3.3. Connecting People and Places (GWC6 & WoB6)

Background / Evidence Base Findings

Transport Impact Studies

- 3.3.1. Two new transport studies were undertaken in 2019 to contribute to the transport evidence base for the Local Plan Reviews. Both were based on the results of strategic transport modelling carried out using TfL's suite of strategic modelling tools and assessed the current state of the transport network, the future impact of expected population growth and development and the effects of the introduction of transport improvements ('mitigations').

⁶ See modification GWC_SP_34_A in [Core05-Add LBH LPR Volume 4 Table of Additional Modifications](#) and modification WOB_SP_17_A in [Core04-Add LBH LPR Volume 3 Table of Additional Modifications](#)

West of Borough Highways Impact Assessment

3.3.2. This study analysed the results of highway modelling of the West of Borough area and included background growth (LTS 7.1 plus WoB background growth and full growth in the 'East of Borough' area and outside the borough), low growth without mitigation, low growth with mitigation and high growth with mitigation development scenarios. All scenarios took account of expected background growth in the area, but the two low growth scenarios included approximately half of the expected number of homes and jobs to be delivered through strategic sites in the Bedfont Neighbourhoods place policy area, and none of the homes or jobs to be delivered at the Heathrow Gateway safeguarded location. Mitigations included bus priority schemes, new cycle infrastructure, junction improvements and mode shift resulting from travel demand management measures such as School Travel Plans.

3.3.3. Key findings:

- The impact of unmitigated growth on the transport network will be felt across Hounslow although most acutely in the Bedfont area under the high growth scenario, negatively impacting journey times.
- The mitigation measures proposed will likely provide improved highway network conditions with journey times under the low growth scenario close to pre-development levels. The mitigation package does not however bring traffic levels back to pre-development levels. Their introduction is expected to reduce the impact of additional low growth development in the borough but only partially offset the impact of high growth development.
- Other schemes such as Heathrow Southern Rail Access or equivalent bus improvements could further help reduce the transport impact from the proposed high growth scenario.

Great West Corridor Strategic Transport Study

- 3.3.4. This transport study has been carried out as a jointly funded and managed project between TfL and LB Hounslow and the final report and its conclusions have been agreed by both parties. The study analysed the results obtained from highway and public transport modelling of the ambitious housing and employment development targets for the Opportunity Area as defined in the draft London Plan. These targets are indicative and should be tested through the Local Plan Review.
- 3.3.5. Potential mitigations were wide ranging and included tube and rail line upgrades, a new rail link between Brentford and Southall, the West London Orbital (WLO) rail link and a bus rapid transit scheme along the A4. The study also took into account the mode shift expected as a result of applying TfL's Healthy Streets Framework to improve active travel connections. Mitigations were first tested individually and then grouped into indicative rail focused and bus focused packages to test their cumulative impact.
- 3.3.6. The study was completed in May 2019. Key conclusions indicate that:
- The forecast growth in the GWC is considerable and if unmitigated has the potential to negatively impact journey times across all modes.
 - The mitigation packages are likely to reduce traffic levels to pre-development levels but may not fully offset the impact on journey times.
 - Potential issues such as overcrowding on the public transport network were successfully addressed by the mitigation packages.
 - New development will need to be phased and delivered concurrently with transport improvements if negative impacts on the transport network are to be avoided.
 - Ambitious targets for sustainable transport use (active travel and public transport) in line with the Mayor's Transport Strategy will be needed if the full levels of London Plan proposed development are to be supported.

Southall rail link

- 3.3.7. A GRIP 2 level feasibility study was completed in early 2016. This concluded that the re-provision of passenger services on this link was technically viable.

A business case was also completed that concluded that the link had a 'high' value for money with an expected benefit to cost ratio of 3.0:1 using the Department for Transport's assessment approach.

- 3.3.8. Network Rail completed their detailed optioneering report (GRIP 3) in 2019. The report made recommendations as to the single 'preferred' design option for the infrastructure required to realise this service. An update to GRIP3 is being carried out in 2020 to accommodate several design changes with the objective of reducing overall costs.
- 3.3.9. Once GRIP 3 is complete, GRIP 4 (Approval in Principle) will begin which will substantively agree the final form of the scheme, subject to consents and detailed design.
- 3.3.10. LBH are continuing to investigate potential funding source options. These include contributions from developers, contributions in the form of grants from Government bodies (e.g. DfT or TfL) and borrowing (from public or private sectors) repaid by increased business income or a Workplace Parking Levy (WPL).
- 3.3.11. Following a public consultation into the introduction of a WPL in Brentford, LB Hounslow are currently preparing a business case which will analyse in detail the benefits and feasibility of the scheme. Once complete, a further public consultation is scheduled to take place in the autumn of 2021. The business case and results of the public consultation will be presented to Cabinet by December 2021, with the intention of undertaking an initial trial run of the scheme over summer 2022 following local elections should the scheme be approved by The Mayor of London.
- 3.3.12. An outline business case for the shuttle rail link to Southall Crossrail was submitted to the Department for Transport in 2019. LBH have subsequently updated the Strategic Outline Business Plan (SOBC) following a detailed challenge session with DfT advisors. If successful, the SOBC will place the scheme on the Rail Network Enhancement Pipeline (RNEP) and could unlock a significant capital contribution. Further discussions with DfT are expected in early 2021 to confirm the next stage of business case development.

West London Orbital (WLO)

- 3.3.13. The West London Orbital (WLO) is a proposed 11 mile long extension of the Transport for London Overground rail network that would link Hendon and West Hampstead to the north-east with Kew and Hounslow in the south-west. It would bring back into passenger use the Dudding Hill Line between Cricklewood and Acton; trains would then use the North London Overground line and the South Western mainline between Kew Bridge and Hounslow and serving intermediate stations at Lionel Road, Brentford, Syon Lane and Isleworth. It is supported by Proposal 88 in the Mayor's Transport Strategy (MTS): "The Mayor, through TfL, the West London Alliance boroughs and Network Rail, will work towards delivery of a new London Overground 'West London Orbital' line connecting Hounslow with Cricklewood and Hendon via Old Oak, Neasden and Brent Cross". This support was reaffirmed in TfL's 2018/19-2023/24 Business Plan. The project is included in the London Plan's indicative table of transport schemes (table 10.1).
- 3.3.14. Since publication of the MTS West London planning authorities (including Hounslow) have been working together and with TfL to develop the business case for the WLO, particularly in identifying development capacity around WLO stations. They have also ensured the WLO is fully supported in local plans. A strategic outline business case has been prepared (GRIP 1). The Strategic Outline Business Case (SOBC) for the WLO has been published and concluded that there was a strong case for the scheme to be taken forward.
- 3.3.15. Work on the next phase began in autumn 2019 and will further develop the project, focussing on technical feasibility, identification of economic benefits and funding/financing (GRIP2). This stage will also include the first round of public consultation on the scheme. West London Boroughs will continue to be closely involved in development of the case for the project and options for its funding and financing.

Southern Rail Access

- 3.3.16. LB Hounslow has continued to promote a preferred alignment for this new link which would connect Feltham to Heathrow via a new station in Bedfont. There are several other possible alignments, and all are to be assessed by DfT.
- 3.3.17. A meeting was held with the DfT in May 2019 to outline to stakeholders how a framework for the assessment of the various proposals would be created. LB Hounslow will be included in an engagement exercise regarding the objectives by which each alignment will be assessed. The objectives will then be used as the basis of a Strategic Outline Business Case which will be developed for each proposed alignment. This will include an investigation of the cost and benefits of each scheme as well as an indication of deliverability.

Gunnorsbury Station

- 3.3.18. Significant improvements to the capacity of Gunnorsbury Station are required to support development in the east of the Great West Corridor. The GWC Masterplan and GWC Plan policy GWC6 and GWC P3 support significant improvements to station capacity and environment, potentially with the opening of a secondary entrance from Wellesley Road. This will be facilitated through enabling development.

Record of Agreement

- 3.3.19. The Local Plan Reviews adopt the principles of Healthy Streets and Good Growth (with regards to transport), as well as measures to improve road safety, which are in line with the London Plan.
- 3.3.20. The Mayor welcomes the policies in WOB6 and GWC6 that aim to provide alternatives to the private car including through improved public transport infrastructure, safe and legible pedestrian and cycle routes and to limit the provision of car parking such as ensuring that parking is provided in accordance with London Plan policies. The Mayor supports the lower than maximum parking provision in GWC West and Central and car free development in GWC East.
- 3.3.21. The Mayor considers that the draft GWC Local Plan review proposes sufficient mitigation by way of sustainable transport connections to address

the substantial increases in population and employment proposed over the plan period.

- 3.3.22. The Mayor notes that TfL have been consulted on policy preparation, and that strategic policies in both local plan reviews (GWC6 'Connecting People and Places' and WoB6 'Connecting People and Places') have been prepared in line with the findings of the Strategic Transport Impact Assessments undertaken (Great West Corridor Strategic Transport Study and West of Borough Strategic Transport Study respectively). TfL are party to the LBH Local Authorities SCG and have agreed positions relating to transport matters.
- 3.3.23. The Mayor requests that car parking floorspace set out in the Site Allocation document should be expressed as a maximum and not a minimum. Both parties agreed and made these amendments to the draft Site Allocations accordingly.
- 3.3.24. The Mayor notes that TfL has previously expressed concerns about the specific Southern Rail Access (SRA) proposal put forward LBH referenced in WOB6 b (1) as well as policies P1, P2 and P3 in the Places section. The Mayor notes the further letter sent by TfL on 10/01/2020 acknowledging the potential merits of the Hounslow SRA scheme in terms of the role it could play in improving access to Heathrow airport, and that TfL will continue to work with LBH to identify the necessary mitigations required to ensure that a Hounslow SRA alignment would be well integrated with the wider network to enable it to be delivered and operated effectively, should it go ahead.
- 3.3.25. Both parties acknowledge that alternative mitigation and lower cost transport and connectivity proposals will be considered should LBH's SRA alignment proposal outlined in the West of Borough Plan not come forward.

4. Signed confirmation

- 4.1. The contents of this Statement of Common Ground are agreed for the purposes of the LB Hounslow draft Site Allocations (Vol.2), draft WoB Local Plan Review (Vol.3) and draft GWC Local Plan Review (Vol.4).

Signed on behalf of LB Hounslow		
Name and position	Signature	Date
[Name] Peter Matthew [Job Title] Executive Director, Housing Planning and Communities		25 May 2021

Signed on behalf of The Mayor of London		
Name and position	Signature	Date
Lucinda Turner Assistant Director - Planning		24 May 2021

Appendix 1: Proposed Additional Modifications

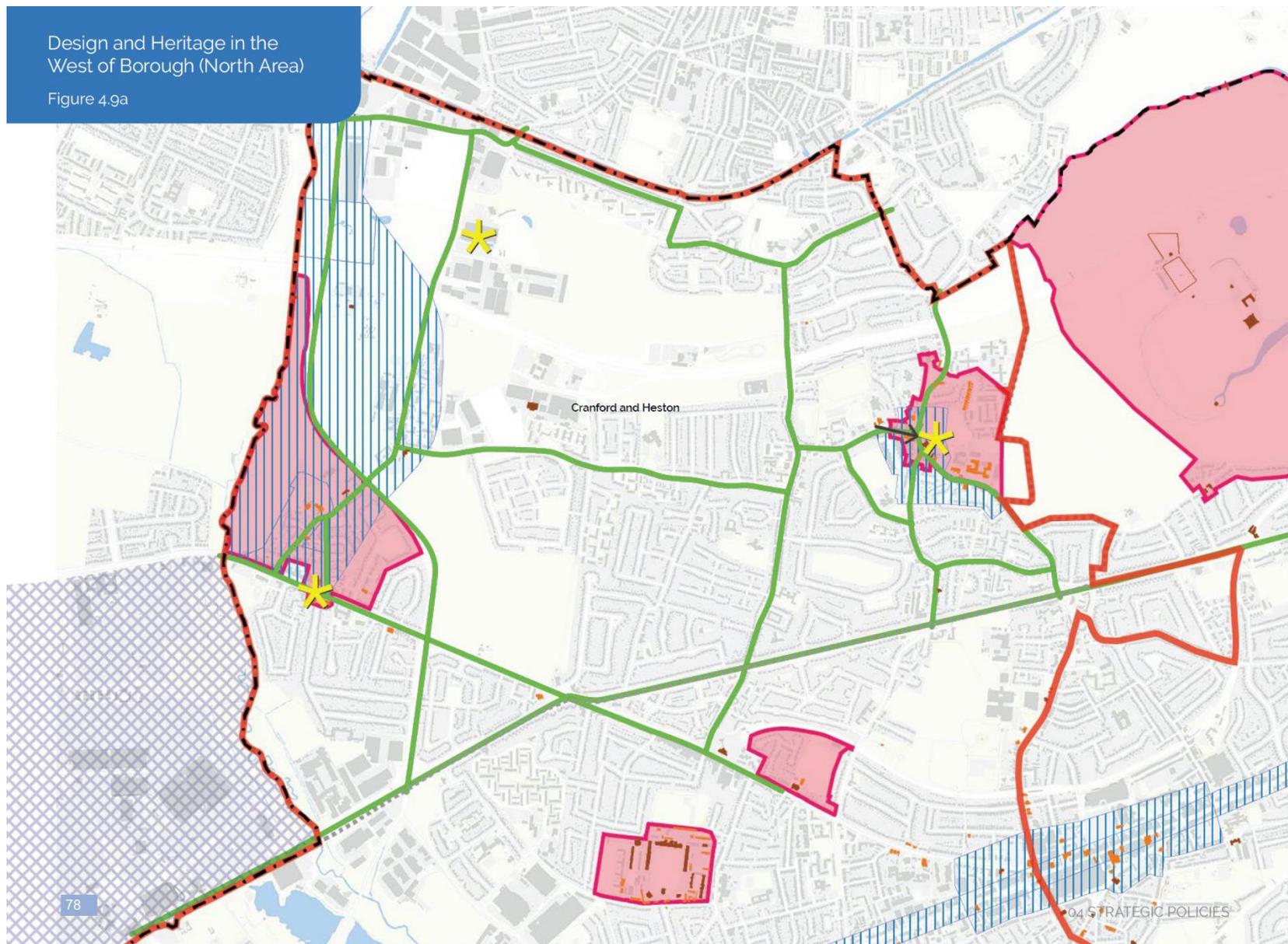
Hounslow policy and supporting text with its proposed changes in green, and GLA amendments in blue text	GLA comments	Hounslow comment
<p>WEST OF BOROUGH Local Plan Review</p> <p>POLICY WOB5 DESIGN AND HERITAGE</p> <p>(k) Deliver landmark and tall buildings of the highest architectural and design quality in the appropriate locations including those identified in the Feltham Masterplan, and Places Policies, and in locations around well-connected public transport nodes as shown in figures 4.9a-b.</p>	<p>London Plan Policy D9 part B requires boroughs to determine where tall buildings could be an appropriate form of development and identify these locations and what height they can be built on maps in the development plan which Hounslow has done. However, to make clear that the ‘well connected transport nodes’ have been identified in the plan the policy should refer to figures 4.9a and b. If these figures do not contain all the relevant sites, the borough should add them to these maps.</p> <p>Importantly, it states that tall buildings should only be developed in these locations <i>‘Tall buildings should only be developed in locations that are identified as suitable in Development Plans’</i>. Thus the borough policy should not imply that the tall buildings will be supported outside the areas it has identified in the policy. The SoS direction DR12 made it clear that this was his intention in making his direction as shown by the text of his direction overview <i>‘The draft London Plan includes a policy for tall buildings but this could allow isolated tall buildings outside designated areas for tall buildings and could enable boroughs to define tall buildings as lower than 7 storeys, thus thwarting proposals for gentle density. This Direction is designed to ensure that there is clear policy</i></p>	<p>Minor amendments (see below) are needed to Figures 4.9a-b to map all the locations that are identified as suitable for Tall buildings in line with the evidence base documents:</p> <ul style="list-style-type: none"> • DH06 LBH Feltham Masterplan (2017) and • DH05 LBH West of Borough Opportunity Capacity Study (2016). <p>Minor amendments (see below) are needed to the legend of Figures 4.9a-b to clarify that focal buildings, clusters, and other tall buildings are areas suitable for tall buildings.</p>

<p>4.67 The draft new London Plan Policy D9 'Tall Buildings', is the primary policy with regard to tall buildings. It states that tall buildings should be part of a planned approach and that local authorities should define what it considers is a tall building for a location identify in Development Plans, and identify locations where tall buildings are appropriate in principle and indicate general the building heights that would be appropriate in Development Plans. The Council considers that a tall buildings in the West of Borough should not be less than is defined as a building of 21 20 metres or more in height measured from ground level. to the floor level of the uppermost storey as set out in Local Plan Policy CC3 (Tall Buildings) The locations where tall buildings are appropriate in principle are identified in Policy WOB5 (k), figure 4.9a-b.</p>	<p><i>against tall buildings outside any areas that boroughs determine are appropriate for tall buildings, whilst ensuring that the concept of gentle density is embedded London wide.'</i></p> <p>To address this issue the suggested changes to this policy and paragraph 4.67 are needed.</p> <p>Suggested changes to reflect policy D9 more accurately.</p> <p>To address Policy D9 requirement that a tall building definition should 'not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey'. The definition in the Local Plan should be the total height of the building in meters above ground level to make it clear and practical to apply. Referring to the ground floor of the uppermost level will add unnecessary complexity (e.g. early planning discussions will concern overall height of a building not the individual storey levels) and in the case of some buildings the upper most storey could be very high.</p> <p>21m is a reasonable interpretation of what the minimum total height of a building would be if the floor level of the top storey cannot be less than 18m. This is assuming an average height of a storey is 3m (3m storey height is referenced in the figure 4.8). 20m is not a realistic building height if the floor of the upper storey has to be at least 18m.</p>	
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<p>POLICY P1 FELTHAM TOWN CENTRE: (q) Supporting new development that responds positively to its surrounding context providing higher densities of up to six storeys at ‘the Station Quarter’. Landmark buildings above this height can be up to 14 storeys in the key locations identified (shown in Figure 5.4) and will be subject to stricter design controls.</p> <p>POLICY P3 HEATHROW GATEWAY: (j) Delivering a compact urban form with typical building heights of five to ten eight storeys forming a tall buildings cluster. There are opportunities to mark the strategic location through focal buildings up to 21 storeys on a number of key sites.</p>	<p>London Plan Policy 9D(B) and para 3.9.2(2)(3) say that Development Plans should also identify appropriate/maximum heights in Tall Building locations.</p>	<p>Minor amendments (see below) are needed to Figure 5.4 and Figure 5.8 to ensure that they correspond with the WoB Strategic Design and Heritage Figures 4.9a-b.</p>
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<p>Great West Corridor Local Plan Review</p> <p>GWC 5 Design and Heritage</p> <p>4.65 The draft new London Plan Policy D9 (Tall Buildings), is the primary policy with regard to tall buildings. It states that tall buildings should be part of a planned approach and that local authorities should define what it considers is a tall building for a location identify in Development Plans, and identify locations where tall buildings are appropriate in principle and the building heights that would be appropriate in Development Plans. The Council considers that a tall buildings in the Great West Corridor should not be less than is defined as a building of 25 metres or more in height measured from ground level. to the floor level of the uppermost storey The locations where tall buildings are appropriate in principle are set out in Policy GWC5 (h) II and III, identified in Figure 4.10.</p>	<p>Suggested changes to reflect Policy D9 more accurately.</p> <p>See comments above for WoB Local Plan in regard to defining a tall building and specifying the locations where tall buildings is acceptable in principal.</p>	<p>Minor amendments (see below) are needed to the legend of Figure 4.10 to clarify that clusters, focal buildings and local highpoints are areas suitable for tall buildings.</p>
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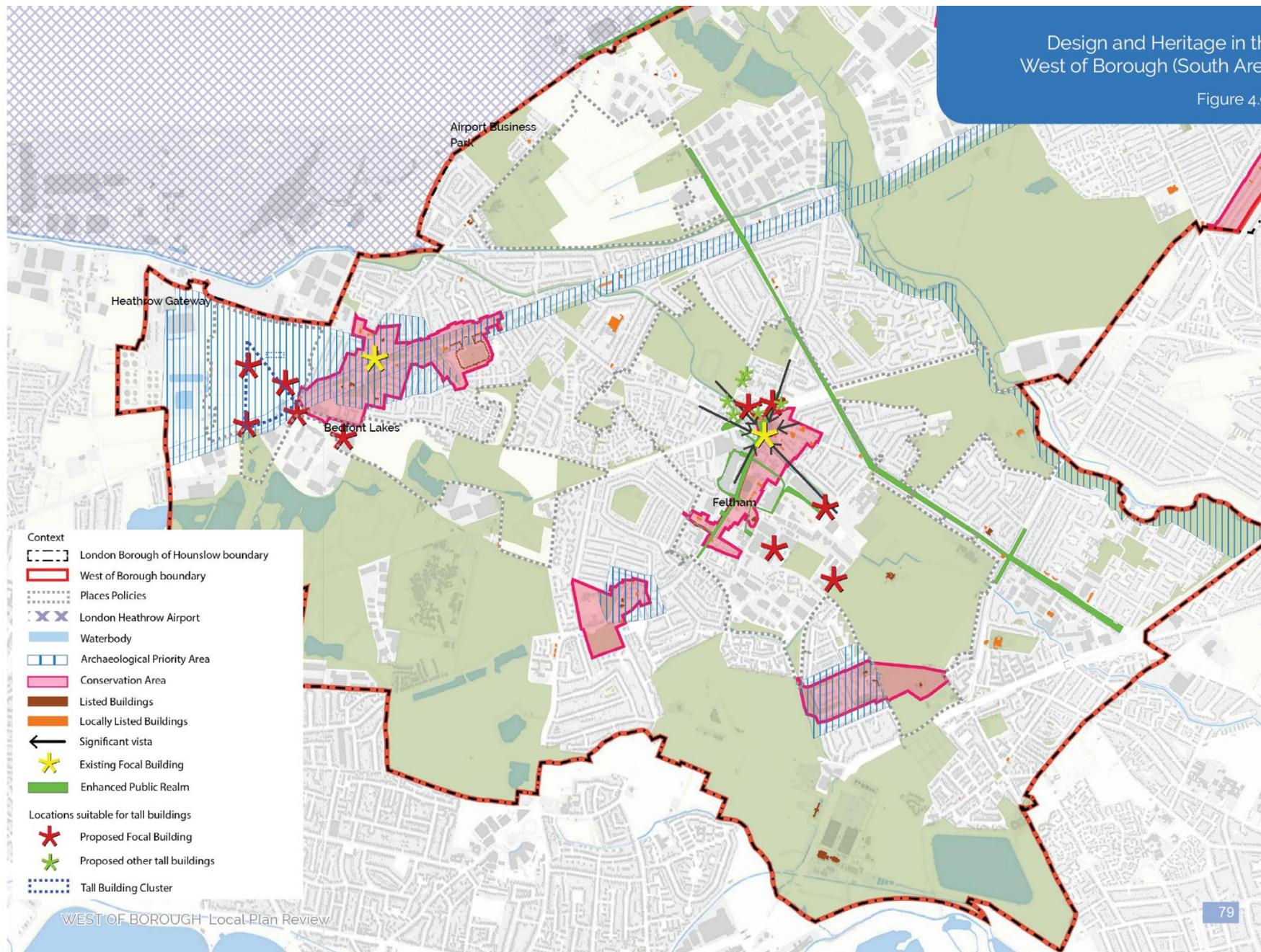
Minor amendments to Figures 4.9a and b; 5.4 ; 5.8 (West of Borough) and Figure 4.10 (Great West Corridor)



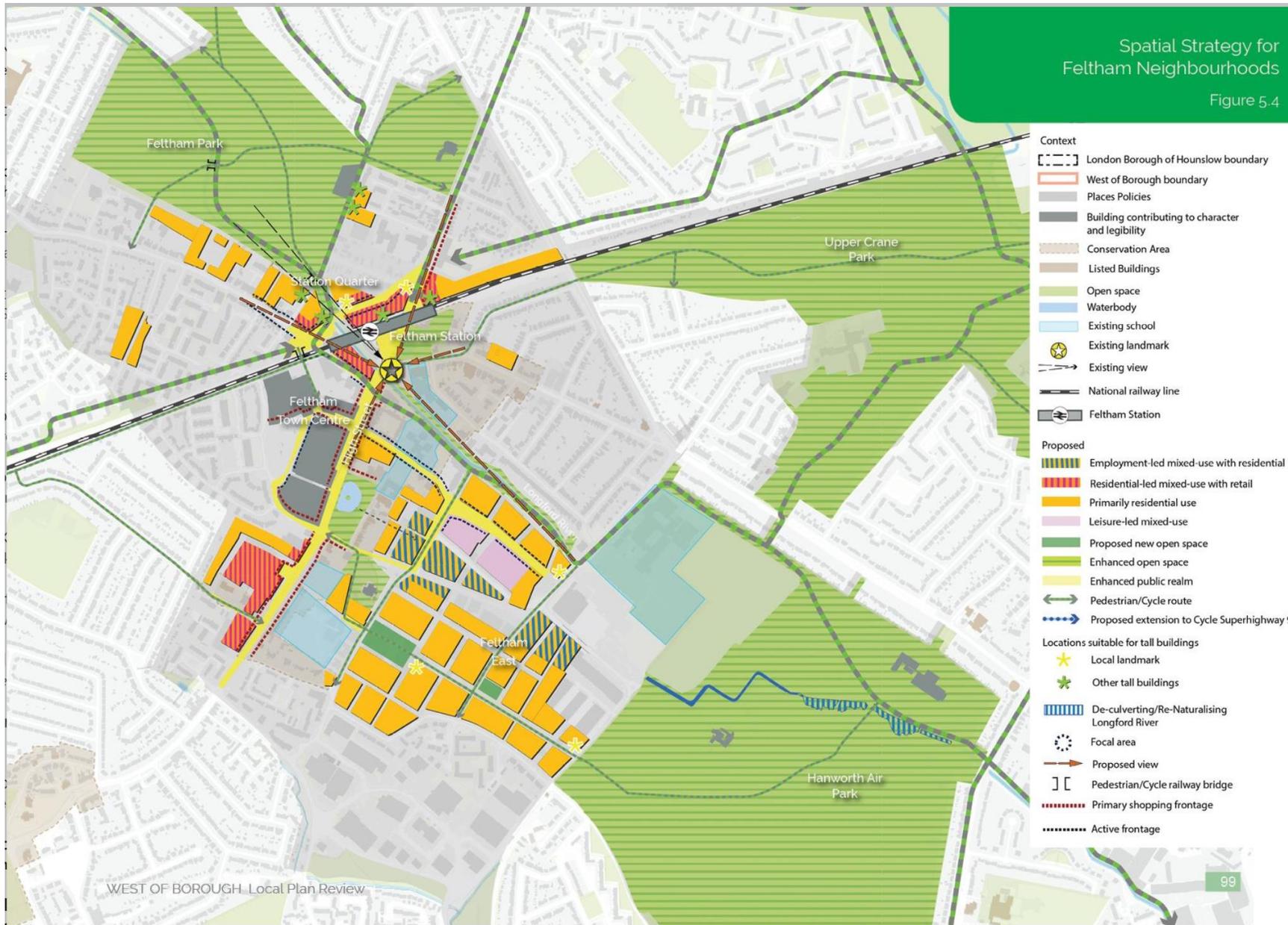
Minor amendments to Figures 4.9a and b; 5.4 ; 5.8 (West of Borough) and Figure 4.10 (Great West Corridor)

Design and Heritage in the West of Borough (South Area)

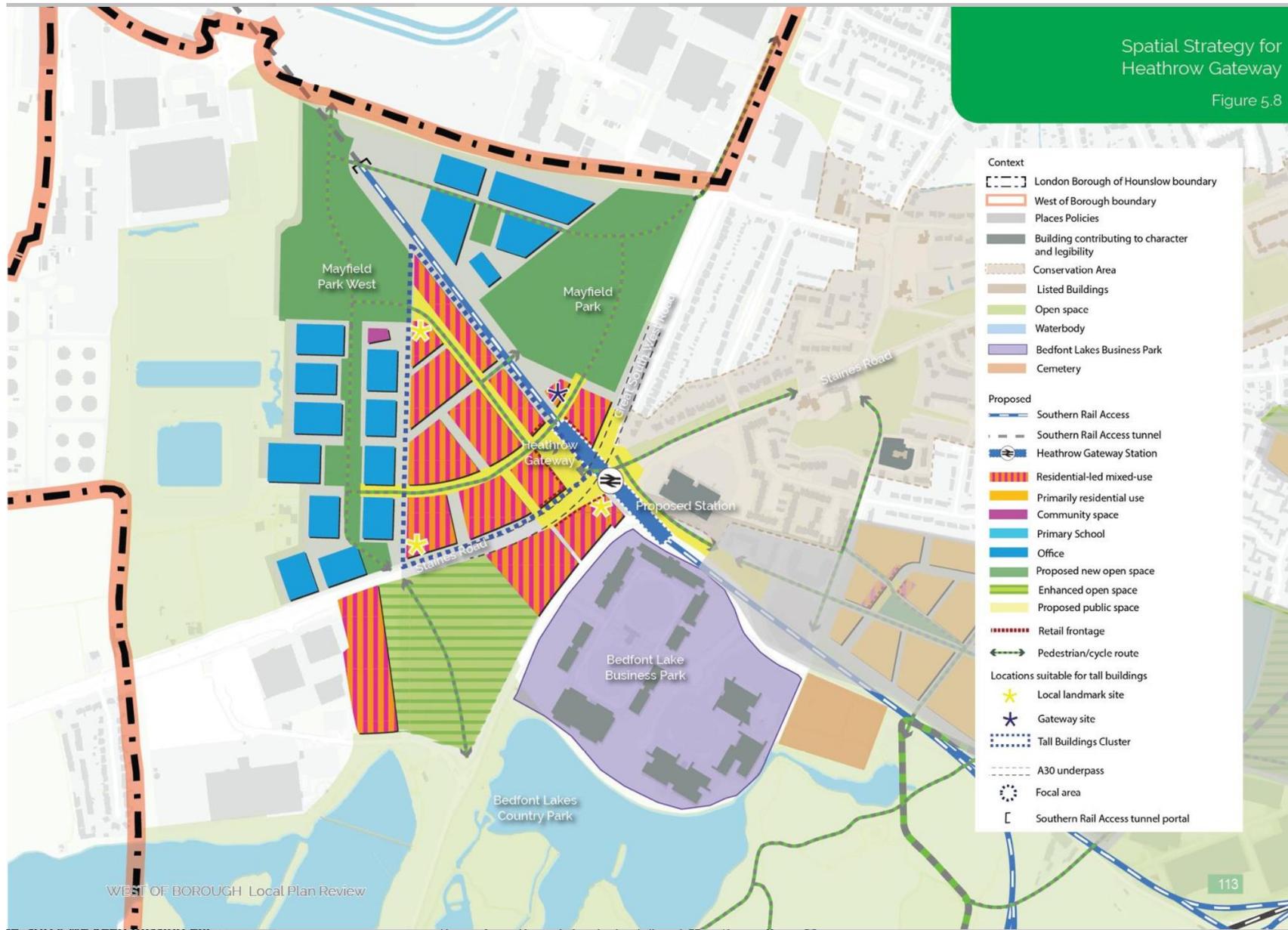
Figure 4.9b



Minor amendments to Figures 4.9a and b; 5.4 ; 5.8 (West of Borough) and Figure 4.10 (Great West Corridor)



Minor amendments to Figures 4.9a and b; 5.4 ; 5.8 (West of Borough) and Figure 4.10 (Great West Corridor)



Minor amendments to Figures 4.9a and b; 5.4 ; 5.8 (West of Borough) and Figure 4.10 (Great West Corridor)



Design and Heritage in the Great West Corridor

Figure 4.10

- Context**
- London Borough of Hounslow boundary
 - Great West Corridor boundary
 - Archaeological Priority Area
 - Conservation Area
 - Listed Buildings
 - Locally Listed Buildings
 - World Heritage Site

- World Heritage Site buffer zone
- Waterbody
- Panoramic view
- Linear view
- Building Set Backs for Soft Landscaping Improvements

- Locations suitable for tall buildings**
- Proposed Local Highpoint
 - Proposed Focal Building
 - Proposed other tall buildings
 - Tall Building Clusters
 - CL1 Wyke Green
 - CL2 Golden Mile Station Quarter
 - CL3 Brent River
 - CL4 London Gateway
 - CL5 Brentford Stadium West
 - CL6 Brentford Stadium East

Appendix 6

LB Hounslow Local Plan Reviews

Statement of Common Ground

Between

London Borough of Hounslow

And

Surrey County Council

Version 3

May 2021

1. Introduction

- 1.1. This Statement of Common Ground (SCG) has been prepared between the London Borough of Hounslow (LBH) and Surrey County Council (SCC). It seeks to inform the independent examination of LBH's emerging West of Borough (WoB) Development Plan Document (DPD) and will be submitted to the Planning Inspector to assist the examination in public.
- 1.2. It sets out the parties' agreed positions in relation to strategic cross-boundary matters identified in SCC's Regulation 19 representation and subsequent duty to cooperate meetings.

2. Background

- 2.1. LBH and SCC have engaged with one another to discuss strategic cross-boundary matters throughout the preparation of the WoB Local Plan reviews. Surrey CC submitted a representation to the Regulation 19 consultation of the WoB Local Plan review raising issues around the potential impact of growth within the WoB area upon roads in neighbouring Spelthorne. A meeting was held on 10/02/2020 to address these matters and further information on projected vehicle movements was sought from consultants. A subsequent virtual meeting was held on 04/06/2020 to discuss next steps and to discuss the potential of entering into a LBH-SCC SCG.
- 2.2. Further technical information and a Transport Background Paper (TBP) was produced by LBH in order to respond to matters raised by SCC and this was provided on 07/09/2020. SCC provided a further response on 17/12/2020 asking for clarification on several points and LBH responded with an updated TBP (with appendices) on 26/01/2021. A meeting between LBH, SCC and Highways England (HE) was held on 23/03/2021 to discuss outstanding matters and to agree positions through an SCG to inform the examination of the emerging WoB DPD.
- 2.3. This SCG has been prepared in line with ongoing discussion of strategic matters between the parties involved, as required under the duty to cooperate. The SCG sets out areas of agreement and any matters which have yet to be agreed in order to aid the upcoming examination of the LBH local plan reviews.

3. Strategic Geography

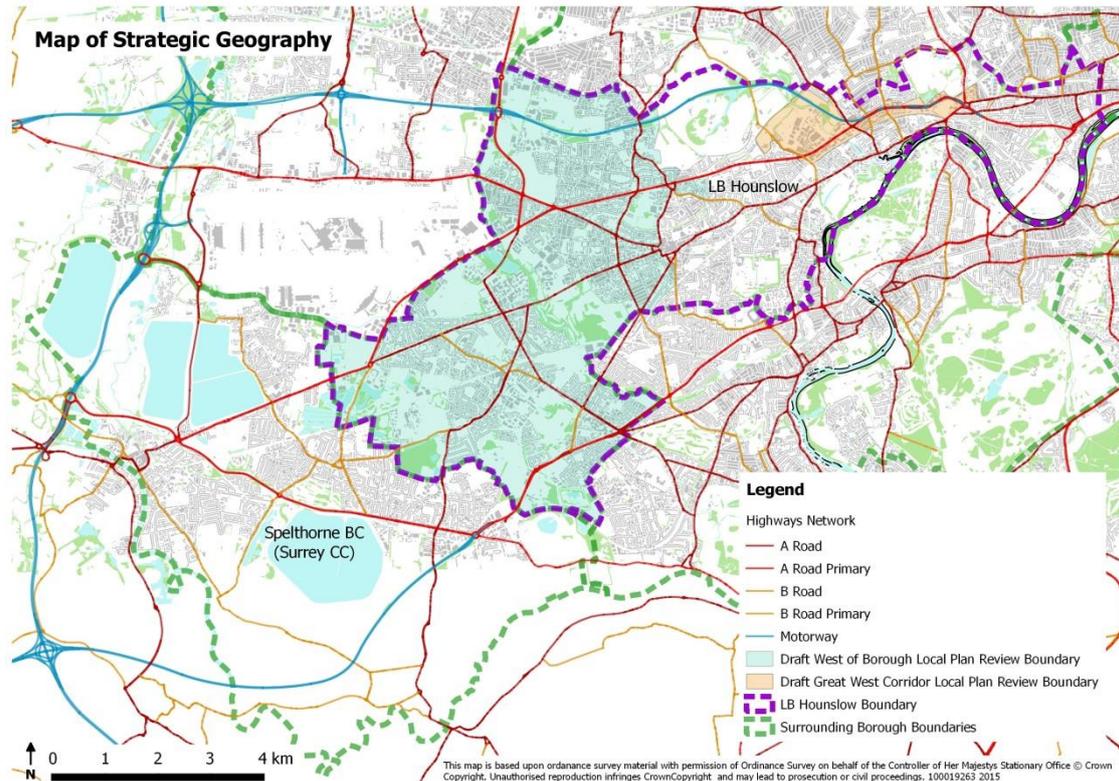


Figure 1: Map of strategic geography

3.1. The map above (figure 1) describes the strategic geography considered for cooperation on strategic matters outlined in this Statement of Common Ground (SCG). The area contains the administrative areas of LBH and Spelthorne Borough Council (this being the authority area within Surrey where cross boundary matters are geographically located). The map also contains the highways network, including motorways, A and B Roads.

4. Strategic Matters and Record of Agreement

4.1. Cross boundary highways impacts

4.1.1. LBH have engaged with SCC throughout the preparation of the emerging WoB DPD and have responded to requests for further information regarding potential cross-boundary highways impacts, as set out in the LBH Transport Background Paper (2020)¹.

4.1.2. LBH maintains that it is appropriate to undertake strategic level modelling of transport impacts to support a local plan covering a large road network. With regards to detailed modelling of the A30 / B378 junction, it remains LBH's view that such modelling is best conducted at application stage and emerging policy WoB6 addresses this through the requirement for developers to provide detailed transport assessments and travel plans. LBH have provided further clarification through post-Regulation 19 amendments

¹Please see CPP06 LBH LPR Transport Background Paper (2020)

to WoB6 supporting text in order to ensure that *inter alia* the cumulative impact of any neighbouring development (i.e relevant neighbouring applications/developments located within LBH boundary and schemes which cross the boundary), and the impact on neighbouring boroughs, should be taken into account when producing these assessments (see para 4.2.1 below).

4.1.3.Surrey County Council acknowledges the findings of the transport evidence base, referenced above. A particular concern has been the impact of development on the A30/B378 junction. The proposed amended wording to WoB6 supporting text clarifies that both the cumulative impact of development and any resulting impacts on the road network of neighbouring authorities will be captured in transport assessments.

4.1.4. Following a duty to cooperate meeting on 23/03/2021 LBH have produced a note setting out the active travel routes and proposed transport mitigation measures for the West of Borough growth area, with a particular focus on its southern neighbourhoods (please see appendix 1). This details key active travel infrastructure projects in the area, along with details of scheme feasibility and deliverability, as well as a summary of public transport and travel demand limitation measures being taken forward through the WoB Plan and supporting documents, such as the Local implementation Plan (LIP) and Infrastructure Delivery Plan (IDP).

4.1.5.Both parties will continue to liaise with each other to ensure that LBH's proposed active travel routes and improvements can be aligned with SCC's forthcoming programme of active travel improvements in Spelthorne. Both parties agree that cooperation is required to increase connectivity at the borough boundary in order to ensure that more active and sustainable transport movements can take place, and to address cross-boundary highways issues.

4.1.6.LBH will continue to engage with SCC on strategic matters relating to the safe and efficient functioning of the wider highways network, particularly with regards to the potential impact of planned growth within the WoB plan area on the highways network in neighbouring Spelthorne.

4.2. Mitigation beyond the borough boundary

4.2.1. SCC note the proposed modifications to the supporting text of Policy WoB6 set out in the LBH Transport Background Paper (2020), and now included in the WoB Schedule of Additional Modifications². SCC propose the following text be inserted by way of further additional modifications to clarify that the plan's provisions to secure funding for mitigation measures also include potential measures beyond the LBH borough boundary:

'Proposals for new development must include any necessary mitigation measures required as a result of development to be funded and/or delivered by the developer to ensure the continued safe and efficient operation of the strategic and local road networks. In this regard, the council will continue joint working with adjoining

² See Core04-Add LBH LPR Volume 3 Table of Additional Modifications, modification no. WOB_SP_22_A

authorities including Surrey County Council and Spelthorne Borough Council to establish the impact of proposals on the local road network both within and outside the borough and how that might be mitigated and funded and to encourage cross-boundary active and sustainable travel.'

4.2.2. LBH agree to present the text provided as an additional modification to WoB DPD policy WoB6 (see appendix 2 for details). LBH will request that this be added to the WoB Schedule of Additional Amendments accordingly, and present this to the Inspector for consideration at the upcoming examination of the local plan reviews.

4.3. On-going cooperation on highways matters

4.3.1. LBH will continue to engage with SCC on strategic matters relating to the highways network and support for sustainable transport options as part of any future plan-making activities and Local Plan delivery. The councils commit to joint working, in particular to enable cross-boundary active-travel improvements.

4.3.2. Both parties will share any updates to their evidence base relating to strategic highways matters with one another at the earliest possible opportunity. Findings from individual site transport assessments may also require cross-boundary cooperation

5. Governance Arrangements

5.1.1. It is agreed that informal discussions will occur between both parties on the cross boundary issues referred to in this Statement of Common Ground in the form of officer level meetings, with reporting of matters to Member level if necessary. This is in addition to the opportunities for inter-borough discussion of strategic matters provided by the Heathrow Spatial Planning Group, including the Leaders Board, Chief Officers Group, Transport and Spatial Planning sub-groups.

5.1.2. It is agreed that this Statement of Common Ground will be reviewed by both parties at a joint duty to cooperate meeting which will be held on an annual basis.

6. Signed confirmation

6.1. The contents of this Statement of Common Ground are agreed for the purposes of the LB Hounslow WoB Local Plan Review.

Signed on behalf of Surrey CC		
Name and position	Signature	Date
Caroline Smith, Planning Group Manager		10 th May 2021

Signed on behalf of LB Hounslow		
Name and position	Signature	Date
Peter Matthew, Executive Director Housing, Planning and Communities		11 th May 2021

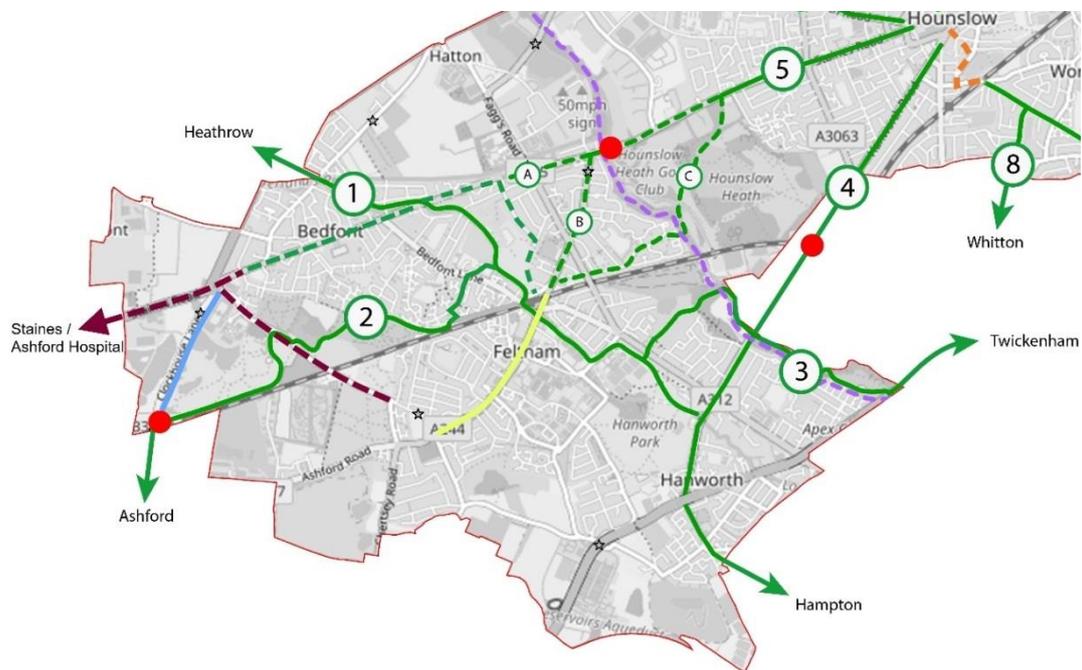
Appendix 1: Transport mitigation measures for the West of Borough growth area, with a particular focus on its southern neighbourhoods

Introduction

This document describes the transport mitigation measures that are planned over the lifetime of The Hounslow Local Plan for the West of Borough growth area with a focus on those active travel schemes that are expected to influence cross border movements from its southern neighbourhoods into Surrey. The evidence presented here has informed the preparation of The Hounslow Local Plan: West of Borough Review.

Overview of Active Travel Routes

The following map shows existing and planned active travel routes expected to facilitate movement by active modes in the south west region of the borough. Wherever practicable, all routes do or will benefit from segregated cycle facilities and junction improvements targeted at both pedestrians and cyclists.



- Major barrier to cycling
- - - Off highway leisure route
- - - Identified desire line
- - - Bedford Rd/A315 Existing Facilities
- Proposed Hounslow Priority Cycle Network
- - - Proposed Hounslow Priority Cycle Network – Route Option
- Feltham Town Centre and Lower Feltham Route
- Clockhouse Lane – Planned active travel route

Route 5(A) will play an important role as a direct route to Staines and Ashford Hospital for Bedfont and surrounding neighbourhoods whilst route 2 will offer a very flat, primarily traffic-free link connecting to Ashford town centre in neighbouring Surrey. Clockhouse Lane is a key connector that will facilitate movement between the routes and the improvement of active travel facilities along this route and at its junctions remains a high priority for London Borough of Hounslow. To ensure that route 2 connects to trip attractors across the border, LB Hounslow recognises that a coordinated approach with Surrey County Council will be needed. To fully realise the potential of route 5, coordination with Highways England on the A30 section will also be required.

Whilst these routes are expected to carry the majority of cross-border trips, LB Hounslow also considers in-borough routes, such as that recently introduced in Feltham Town Centre, as being equally important. Not only do they serve the neighbourhoods most likely to need to travel into Surrey, they provide a safer, more attractive means of joining the two main routes described.

More information on the Hounslow Priority Cycle Network can be found in Hounslow’s [Local Implementation Plan](#).

Key Infrastructure Projects

The following table is an extract from LB Hounslow’s [Infrastructure Delivery Plan](#) and describes both funding and delivery status of the active travel routes and junction improvements in the south west area.

Area	Description	Phase	Funding Status	Delivery	Delivery Status
Bedfont	Clockhouse Lane Active Travel Route - Foot and Cycle Bridge	2 – 3*	<u>Anticipated</u> Part of severance reduction programme - £15m capital budget allocated borough-wide across all schemes	SCC/LBH	Feasibility
Bedfont	Junction Optimisation- Clockhouse Roundabout grade separation	2 - 3	<u>Anticipated</u> £27,000,000 - LIP (TfL)/Heathrow	TfL	Feasibility
Feltham North	Strategic Route 5(A): Segregated cycle facilities – A315 Staines Road – A244 to Bedfont	1	<u>Anticipated</u> £400,000 - LIP funding and other TfL grant funding.	LBH/TfL	Outline design
Cranford	Strategic Route 5(A): Segregated cycle facilities A315 Staines Road – Green Ln to A244 Hounslow Road	1	<u>Anticipated</u> £1,750,000 – LIP funding and TfL funding.	LBH/TfL	Feasibility
Hanworth Park	A244 High Street/Ashford Road – Feltham TC to	1	All funding secured	LBH/TfL	Detailed Design

	Sunbury Road				
Bedfont	Bedfont Road – Clockhouse to Chertsey Road.	1	All funding secured	LBH/TfL	Complete (2020)
Hanworth	Hounslow Road, Hanworth – A312 to A316	1	All funding secured	LBH/TfL	Complete (2020)
Borough-wide	Hounslow Priority Cycle Network – including routes 1 and 2	2 - 3	<u>Secured</u> £430,000 - LIP funding <u>Anticipated</u> £2,285,000 - TfL funding	LBH	Delays due to COVID19 - choice of first route to be confirmed in 2021.
Feltham North	Feltham Station Interchange and Town Centre Major Scheme including Hounslow Road railway bridge widening.	1 - 2	All funding secured	Network Rail LBH	Phase 1 and 2 works complete (2020). Phase 3 due to start 2021 (pedestrian access at bridge).

*Phase 1: 0-5 years Phase 2: 6-10 years Phase 3: 10-15 years

Public Transport and Travel Demand Limitation

In addition to the planned active travel infrastructure improvements, LB Hounslow will apply a range of planning policies to limit the demand for vehicle ownership and will work with TfL and other public transport operators to ensure that realistic public transport options are available.

Summary of Policies

- Public transport improvements – WoB6(b,c,h) support public transport improvements and sets out the proposed interventions. LB Hounslow will work with TfL to target improvements to cross border bus routes 203 (Hounslow to Staines via Ashford Hospital, including Bedfont residential areas) and 117 (Feltham - Ashford Town Centre and Staines). Opportunities for bus priority schemes such as those introduced into Feltham Town Centre will continue to be investigated.
- Car parking – Policy WoB6(l) refers to the new London Plan parking standards that are significantly stricter than the 2015 version. To complement reduced parking provision, Controlled Parking Zones (CPZs - 'Resident Only Parking Areas') will also be considered to limit opportunities for on-street parking in the surrounding areas. These are already used extensively in the east of the borough however are subject to resident consultation.
- Cycle parking - The cycle parking standards can be found in London Plan policy T5
- Travel Plans – WoB6(n) requires the developments to provide Travel Plans where appropriate so the transport implications can be better managed. LB Hounslow also runs a comprehensive travel demand management programme which is detailed in our Transport Local Implementation Plan 3. It includes school and business engagement programmes as well as one of the most successful cycle training programmes in London for both adults and children.

The Hounslow Local Plan: West of Borough Review also presents a high growth scenario in which it is recognised that further transport mitigations will be required to limit the transport impact.

Additional improvements planned under a high development growth scenario include:

Area	Description	Phase	Funding Status	Delivery Lead	Delivery Status
West Area	Feltham & Heathrow Bus improvements. Improvement schemes likely linked to Heathrow Expansion Turn up and go bus service for all airport bus routes. Euro VI minimum fleet Expansion of free fare zone. Bus priority to link to a new restricted access southern road tunnel to the Central, Terminal Area	2	<u>Anticipated</u> £3,500,000 - Heathrow, LBH, LIP (TfL)	LBH/TfL, Heathrow	Feasibility
Bedfont	Southern Rail Access to Heathrow inclusive of a station at Bedfont	2/3	<u>Anticipated</u> £900,000,000 - Central government funding, DfT, TfL/GLA	Network Rail, DfT, LBH, TFL	Feasibility – currently awaiting DfT decision

Appendix 2: Extract of WoB Schedule of Additional Amendments

Page no	Paragraph/ Policy	Modification	Reason for Modification
84	New paragraph after 4.75	Proposals for new development must include any necessary mitigation measures required as a result of development to be funded and/or delivered by the developer to ensure the continued safe and efficient operation of the strategic and local road networks. In this regard, the council will continue joint working with adjoining authorities including Surrey County Council and Spelthorne Borough Council to establish the impact of proposals on the local road network both within and outside the borough and how that might be mitigated and funded and to encourage cross-boundary active and sustainable travel	To respond to a representation neighbouring authority (REP002 Surrey CC)