

Hounslow Local Plan (2020-2041)

Examination

Stage 1 Hearings Note

Railhead Safeguarding

March 2026



**London Borough
of Hounslow**

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1.0 Introduction

1.1 During the Stage 1 hearing session on Matter 7 (Green Infrastructure, Community Infrastructure and Environmental Quality) held on Thursday 29th January 2026, the Inspectors requested that a Note be prepared in relation to Policy EQ10, specifically relating to concerns raised in relation to the effectiveness of emerging policy which seeks to safeguard the minerals railhead and associated minerals operation at Transport Avenue.

1.2 The details of the tasks to be undertaken in this Note are set out in the *Documents Requested by Inspectors in Hearings Week 2* Note (**Document EX41**)¹ as follows:

- Explanation of any relevant proposed modifications to the Plan arising from hearing discussions.

1.3 The Inspectors asked the Council to engage with Day Group Ltd to seek agreement on a modification to policy EQ10, which would address concerns relating to the interaction between the following designations which cover the minerals railhead at Transport Avenue site:

- Safeguarded Minerals Railhead and associated minerals operation at Transport Avenue (SMR);
- Metropolitan Open Land (MOL); and
- Site of Importance for Nature Conservation (SINC)

1.4 This Note provides a short narrative on the engagement undertaken and provides the form or wording which both parties agree to present as a proposed modification in the updated schedule of suggested modifications.

¹ EX41 – [Documents Requested by Inspectors in Hearings Week 2](#)

2.0 Explanation of any relevant proposed modifications to the Plan

2.1 Day Group Ltd are the leaseholder and site operator for the minerals railhead and associated minerals operation at Transport Avenue. Day Group Ltd raised concerns in relation to ‘mapping anomalies’ affecting the minerals railhead site in their Regulation 19 representation (**REP054** in **Document S9**²) and in their hearing statement for Matter 7 (**Document WS7.3**³).

2.2 During the Matter 7 hearing session, the Inspectors asked the Council to engage with Day Group Ltd in order to agree a form of wording which would provide guidance to decision-makers when considering future minerals railhead-related development of land within the safeguarded minerals railhead designation.

2.3 Both parties discussed potential additional modifications via email in the weeks following the close of the Stage 1 hearings sessions. The below table sets out the modification text agreed between both parties (as confirmed by email exchange on 16/03/26), and which has been included in the updated schedule of suggested modifications:

Modification code e.g. [HLP_C9_01]	Policy, clause / map/ figure	Paragraph / Clause	Page	Modification	Reason for modification
[Mod code still to be determined]	EQ10 Minerals	9.28	230	[new para added to end of ‘new’ para 9.29 introduced via HLP_C9_01 above] [9.30] The Council will support the principle of redevelopment which facilitates the future use of the minerals railhead and associated operation at Transport Avenue. A small area of MOL is located within the northern part of	For clarity and as discussed at the Stage 1 hearing session (Matter 7), and thereafter agreed with Day Group Ltd (as per Inspectors’ direction).

² S9 [Link to Representations made pursuant to Regulation 20 \(in response to consultation at Regulation 19 Stage\)\(Redacted\)](#)

³ [WS7.3 Firstplan Ltd for Day Group Ltd](#)

Modification code e.g. [HLP_C9_01]	Policy, clause / map/ figure	Paragraph / Clause	Page	Modification	Reason for modification
				<p>the safeguarded area. This area has been historically developed and is occupied by rail sidings and associated structures. This developed part of the site serves operational needs that are required to be located near the railhead in the absence of alternative rail served sites. The Council acknowledges that there are associated sustainability and environmental benefits arising from the activities taking place on this site. For the purposes of decision-making, and with reference to London Plan policy G3, A, 1), the minerals railhead and associated operation should be considered to constitute both an engineering operation and/or local transport infrastructure as set out in national policy. As such, any re-development which preserves openness and does not conflict with the purposes of including land within it may be considered to be not inappropriate. There is also a small proportion of the site along the northern boundary which overlaps with a SINC designation</p>	

Modification code e.g. [HLP_C9_01]	Policy, clause / map/ figure	Paragraph / Clause	Page	Modification	Reason for modification
				<p>(‘M006 London’s Canals’). Consideration should be given to the fact that the SINC area which overlaps with the safeguarding area has been subject to historic development and therefore no longer functions as SINC. However, development proposals should have due regard to protecting the adjoining SINC land as per Policy GB7 and London Plan Policy G6.</p> <p>[9.31] Should extraction take place at Rectory Farm, Land South of Western International Market, or indeed any other sites, negative impacts, such as transport movements, should be mitigated. Legacy should be considered through aftercare, restoration and reuse.</p>	

2.4 Day Group Ltd also enquired about the potential for an extension of the existing Strategic Industrial Land (SIL) designation known as ‘Great West Road / Brentford – Transport Avenue’ to cover the whole safeguarded railhead site. The SIL designation in question currently overlaps with a significant portion of the SMR (equivalent to c.81%).

2.5 The Council considers that such an extension would not be feasible at this stage given that this would constitute a significant change to a key designation at post-submission stage

when no consultation with stakeholders (including but not limited to the Mayor/GLA) can take place. The Council also raised concerns about any proposed extension to the SIL being complicated by the fact that the extension would create a further overlap between the SIL and MOL designations, and potentially a new overlap with part of the SINC designation as well. It should be noted that these latter designations also cannot be altered without a MOL Review or SINC Review taking place.

2.6 The Council also considers the change would not be necessary for the safeguarding of the minerals railhead and associated operation, and consider that the agreed modification above would provide sufficient further guidance for decision-makers on how to approach the small portion of the site that is also within MOL and SINC designations. This additional guidance should ensure that the continued operation of the railhead (including any future re-development to facilitate this) would not be unduly prejudiced.

2.7 The Council and Day Group LTD agreed that the mapping issues could be more appropriately and comprehensively addressed as part of the next local plan which would be progressed under the new plan-making system introduced by The Levelling Up and Regeneration Act 2023.