

Examination of the London Borough of Hounslow Local Plan

Matters, Issues and Questions identified by the Inspectors for Stage 2 Hearings

Introduction

- 1) Prior to the hearing sessions, responses are invited from participants on the following Matters, Issues and Questions (MIQs) raised by the Inspectors. The MIQs do not intend to cover every policy criterion in the London Borough of Hounslow Local Plan 2020-2041 (the Plan). Instead, the MIQs are based on the Main Issues relevant to the Stage 2 hearing sessions as identified by the Inspectors and taking account of the views of the Council and other representations.
- 2) In producing the MIQs, consideration has been given to the definition of soundness in the National Planning Policy Framework, December 2023 (the Framework) taking account of the transitional arrangements in the current version. The Framework establishes that policies should be clearly written and unambiguous, so that it is evident how a decision maker should react to a development proposal. The Plan should, therefore, set out clear policies on what development will or will not be permitted. Issues relevant to the legal compliance of the Plan also form the basis of several questions.
- 3) At our request, the Council following the Stage 1 hearing sessions have prepared the following additional documents: EX42, EX43, EX44a to EX44h, EX45, EX46, EX47, EX48a, EX48b, EX49, EX50, EX51, EX52, EX52a, EX53, EX54, EX55 and EX56. The Council has also provided consolidated and up-to-date schedules of suggested modifications in document EX57. A hearing session relating to additional documents has been arranged for Tuesday 12 May 2026 with details of the specific arrangements for submission of hearing statements for that session provided on the next page.
- 4) Where reference is to be made to evidence and Examination documents produced by the Council these should be clearly cross-referenced by providing the document reference, page and paragraph numbers. The Council should also identify and address related concerns in representations and set out any proposed changes considered to be required for the Plan's soundness and legal compliance. This document will be supplemented with further Inspector questions during the hearing sessions.
- 5) Further information about the Examination, hearings and the format for written statements is provided in the Guidance Note, and the Planning Inspectorate's Procedural Guide which should be read alongside the MIQs. Those who made representations at Regulation 19 stage and intend to participate in the hearing sessions, must confirm this by e-mail to the Programme Officer (bankssolutionsuk@gmail.com) **by not later than 5pm on Monday 20 April 2026**. For certainty, other than the follow-up hearing session (see page 2), the deadline for submission of hearing statements for the Stage 2 hearing sessions in relation to Matters 9, 10 and 11 is **by not later than 5pm on Monday 27 April 2026**.

Follow-up Session - Post-hearing notes provided following Stage 1 Hearings

Following the completion of the Stage 1 hearings, the Council have continued to prepare and publish a number of Examination documents that aim to address the Inspectors' requests that are set out within the Action Lists (documents EX30, EX30a and EX40).

The Examination documents seeking to address the Inspectors' Action Lists (all of which were previously made available on the Examination website by Monday 23 March 2026), relevant to this session are as follows:

EX42, EX43, EX44a, EX44b, EX44c, EX44d, EX44e, EX44f, EX45, EX46, EX47, EX48a, EX48b, EX49, EX50, EX51, EX52, EX52a, EX53, EX54, EX55, EX56 and EX57 (insofar as relevant to the Stage 1 hearing discussions, i.e. proposed modifications with the EiP code).

The Inspectors are now offering the opportunity to participants during the hearings and non-participants who made representations at Regulation 19 stage to provide a hearing statement specifically and only on the EX documents listed above to the Programme Officer **by not later than 5pm on Monday 20 April 2026**.

The hearing statement should be no more than 3,000 words in total per representor and no additional information or evidence should be appended. Any hearing statement received after the deadline or introducing new or additional evidence beyond the scope of the relevant EX documents are unlikely to be accepted by the Inspectors. In responding to the EX documents, interested parties are encouraged to suggest further modifications if they consider it necessary to address any soundness or legal compliance issues that they consider relevant.

Any supplementary questions that the Inspectors have that are specific to the EX documents and the related hearing statements will be asked and subject of discussion at the follow-up hearing session scheduled on Tuesday 12 May 2026. The Council and participants will also be given an opportunity to set out their position on the EX documents listed and any related hearing statements received during that follow-up hearing session should they wish to do so. Those who made representations at Regulation 19 stage and intend to participate in the follow-up hearing session, must confirm this by e-mail to the Programme Officer (bankssolutionsuk@gmail.com) **by not later than 5pm on Monday 20 April 2026**.

Matter 9: Site Allocations

Issue:

Whether the proposed allocation of sites in the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan?

Questions:

- 1) Are the proposed site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts?
- 2) Is there any risk that any infrastructure requirements, site conditions and/or constraints might prevent or delay development or adversely affect viability and delivery of any of the site allocations?
- 3) Are the proposed site allocation boundaries justified and effective?
- 4) Are the assumptions regarding the capacity of the sites in terms of density of development and net developable areas justified and what are these based on?
- 5) Are the expected timescales for development in terms of lead in times and annual delivery rates for each site allocation, realistic and supported by evidence?
- 6) Does the Plan sufficiently make clear the infrastructure requirements for each of the allocated sites, together with the timing of and dependencies upon such infrastructure for their delivery?
- 7) Are the proposed allocations and the associated development requirements identified in Chapter 12 of the Plan - justified, effective, consistent with national policy and in general conformity with the London Plan?
- 8) Are any modifications required to ensure that the individual site allocations and/or their development requirements identified in Chapter 12 of the Plan are accurate and sound?
- 9) Policy P2(c) relates specifically to Land at Hatton Fields, without prejudice to our consideration of evidence and previous discussions that took place as part of Matter 4, are the requirements of development proposals in that policy, justified, effective, consistent with national policy and in general conformity with the London Plan 2021?

N.B. For sites where specific representations have been made, the Council is also requested to respond to the particular issues raised where not otherwise covered by the above questions.

- 10) Is Policy IMP2 insofar as it seeks to support delivery of the site allocations - positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan 2021?

Matter 10: Delivering the identified requirements over the Plan period

Issue:

Whether the Plan approach towards the identification and supply of land and anticipated delivery of development is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan, so as to ensure the timely delivery of the identified requirements for the Borough?

Questions:

The following questions link to the further work in documents EX44g and EX44h. The Council is requested to draw upon and cross refer to that updated evidence as appropriate when addressing the following questions.

Housing Land

- 1) What is the estimated remaining total supply in the Plan period?
- 2) What is the estimated total supply in the Plan period from:
 - a) Completions
 - b) Existing planning permissions (subdivided as full, outline, etc)
 - c) Other commitments (e.g. sites subject to the completion of planning obligations)
 - d) Windfalls
 - e) Existing or proposed site allocations
- 3) What informed the assumptions about the scale and timing of supply in relation to build-out rates and lead-in times from these various sources? Are these realistic and based upon up-to-date evidence?
- 4) Is the most up-to-date version of the housing trajectory realistic? Is there sufficient evidence to demonstrate a sufficient supply of deliverable sites (in years 1 to 5) and developable sites (in years 6 to 15) to ensure that the Plan's housing requirement for the Borough would be met?
- 5) Would the Plan realistically provide for a 5-year supply of specific deliverable sites on adoption?
- 6) Has the Council provided clear evidence that dwellings will be completed on sites of 10 or more dwellings with outline planning permission, sites with a grant of planning permission in principle and/or allocations without planning permission, within the 5-year period?
- 7) Is there any clear evidence that sites within the supply should not be considered deliverable within 5-years?

- 8) Is there reasonable confidence that a 5-year supply would be maintained throughout the Plan period? If not, how could this be achieved?
- 9) Is there any evidence that the supply of housing includes sites which should not be considered developable during the Plan period?
- 10) Is there a sufficient range and choice of sites allocated in the Plan in terms of location, type and size, to provide adequate flexibility to meet the housing requirement in the Plan?
- 11) Would the housing allocations ensure that the Plan would be consistent with the Framework, in so far as it seeks to boost significantly the supply of housing?
- 12) Is there any evidence of previous allocations or planning permissions not being brought forward or delivered in a timely manner so as to justify a lapse rate to be applied to the housing trajectory?
- 13) Is the expected contribution to housing land supply from windfalls realistic and justified by evidence?
- 14) In overall terms, would the Plan realistically deliver the dwellings required in the Borough over the Plan period?

Land for Employment, Retail and Leisure

- 15) Is there a suitable range and choice of employment locations, town centres and proposed allocations, in terms of type, quality and size, to address the particular characteristics, roles and functions of areas of the Borough and to meet the requirements for employment growth and associated requirements for employment floorspace and main town centre uses in the Plan?
- 16) What land supply remains available within existing employment areas and town centres and what contribution can they make relative to identified needs? Is there any evidence of long-term vacancy of land and premises?

Matter 11: Implementation and Monitoring

Issue:

Whether the Plan would be able to be monitored effectively to ensure timely delivery of its proposals and be in general conformity with the London Plan?

Questions:

- 1) How would the implementation of the Plan policies be achieved? What mechanisms are there to assist development sites to come forward/progress?
- 2) Is the inclusion of Policy IMP1 justified, given that there is a specific approach to sustainable development that is already provided in national policy?
- 3) How would the implementation of the Plan be monitored? Would it be effective?
- 4) How would the results of monitoring in Appendix 1 of the Plan be acted upon, for example what would trigger a review of the Local Plan, the West London Waste Plan and the CIL Charging Schedule as indicated in Policy IMP3? How would the scope of those reviews be determined?

J Ayres

INSPECTOR

G Wildgoose

INSPECTOR

27 March 2026