

Examination of the Hounslow Local Plan 2020-2041

Inspectors: J Ayres BA (Hons), Solicitor and G Wildgoose BSc (Hons) MSc MRTPI

Programme Officer: Charlotte Glancy

Email: bankssolutionsuk@gmail.com Phone: 07519 628064

Examination web page: <https://www.hounslow.gov.uk/local-plan/local-plan-review>

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Dear Mr Kirk

Examination of the Hounslow Local Plan 2020-2041 - Inspectors' Initial Letter

1. As you will be aware, we have been appointed by the Secretary of State to conduct the examination of the submitted Plan. The Plan being examined is the Hounslow Local Plan 2020-2041: Proposed Submission (Regulation 19).
2. We have commenced the examination with initial reading of the Plan, the supporting evidence base and representations. Based on what we have read so far, we have some initial questions and requests for further information and clarification which are set out below.
3. The Council's response to these points will help to inform the matters, issues and questions (MIQs) for subsequent discussion at the hearings, and the timetable for the examination. As our preparation continues and following receipt of the Council response to this letter, we may have further questions prior to publishing our MIQs.

Relevant National Policy and Guidance

4. Annex 1 of the National Planning Policy Framework (NPPF) published in December 2024 sets out the circumstances where Plans will be examined under a previous version of the NPPF. Those transitional arrangements include where a Plan is for an area where there is an operative spatial development strategy (in this case the London Plan 2021) and it had reached Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the 2012 Regulations) on or before the 12 March 2025.
5. The submitted Plan was published under Regulation 19 for public consultation between Friday 6 September 2024 and Monday 28 October 2024 and therefore, we intend to examine it under the relevant previous version of the NPPF, namely that published in December 2023. It follows that we will also have regard to relevant Planning Practice Guidance published prior to any updates associated with the amendments of the NPPF in December 2024.

Proposed Changes to the Submitted Plan

6. The starting point of the examination is the Regulation 19 version of the Plan which was subject to consultation in accordance with the 2012 Regulations, and that the Council submitted a Plan that they consider to be sound and legally compliant.
7. The Council in the submission letter dated 23 June 2025 have made the formal request under Regulation 20(7C) of the Planning and Compulsory Purchase Act 2004 that we make recommendations of main modifications to the Plan that we consider necessary to make it sound and legally compliant. Furthermore, the Council have provided schedules of suggested modifications to the Plan (documents S11 and S11a). Nonetheless, as these suggested modifications do not form part of the Plan before us and have not been subject to consultation, we intend to examine the Plan as submitted. We will then have regard to the Council's suggested modifications as appropriate, including during the hearing sessions where participants will have the opportunity to comment upon them.
8. The Council's suggested changes will only constitute main modifications to the Plan if we consider that they would be necessary for soundness and/or legal compliance and thereby, recommend them in our final report. We will provide further advice on main modifications / additional modifications in our Guidance Note in due course.

Duty to Cooperate

9. The Council has provided a number of Statements of Common Ground (SoCG) with prescribed bodies. As you will be aware, the Duty to Cooperate (DtC) applies up to the point of submission of the Plan. We note that the Duty to Cooperate Compliance Statement - June 2025 (document S10) accompanied the submission of the Plan. However, for the examination to progress we need to be assured that the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the DtC has therefore been met.
10. The DtC is not necessarily a duty to agree. Furthermore, there may well be matters of difference with DtC bodies identified in the Town and Country Planning (Local Planning) Regulations 2021 which relate to matters of soundness rather than the approach to the DtC. Nevertheless, it is necessary that the Council demonstrates this, where there are relevant cross-boundary strategic issues, through the provision of signed and dated Statements of Common Ground (SoCG) as set out in paragraph 27 of the NPPF (December 2023).
11. The examination library provided on submission of the Plan does not seemingly include SoCGs with a number of neighbouring authorities (for example, the London Boroughs of Hammersmith and Fulham; Hillingdon, and Richmond upon Thames) and other prescribed bodies such as Historic England, the Mayor of London, Transport for London and National Highways that are

seemingly intended to be provided. Please can you confirm whether signed SoCGs under the DtC are to be submitted for each of these prescribed bodies and if so, when we are likely to receive them.

12. Moreover, if the Council does not intend to provide an up-to-date and signed SoCG for any of the prescribed DtC bodies, we would be grateful for an explanation of the intended approach in the context of the DtC.

Strategic Policies

13. Paragraph 21 of the NPPF (December 2023) states that 'plans should make explicit which policies are strategic policies'. In that regard, the Plan does not appear to clearly identify nor differentiate the strategic and non-strategic policies. Please could you provide us with a suggested main modification (e.g. a table identifying the policies in the Plan that the Council intend to be strategic policies when taking account of paragraphs 20 - 23 of the NPPF) to ensure consistency with national policy in that respect.

Housing Supply

14. For the examination to be effective we require the calculation of housing figures that underpin the Plan to be as up-to-date as possible and have a consistent base date. As such we would be grateful if the Council could please prepare and submit to us an up-to-date set of tables including housing completions and extant permissions for the most recent financial year where that evidence is available. The tables should also include an updated 'residual' position (i.e. the delivery surplus or deficit, and five-year housing land supply calculation) relative to and with a base date that is consistent with the 10-year targets for net housing completions / borough benchmarks set out in the London Plan 2021 (Tables 4.1, 4.2 and 4.3).
15. With regard to the above, we also ask for the Council's views on whether this evidence is capable of being produced to take into account the 2024/25 financial year, and how long this may take to prepare those updates to the Hounslow Background Explanatory Note 2025 (document EBSC1).

Employment

16. Similarly to the aforementioned request in relation to housing supply, to assist the effectiveness of the examination we also require an up-to-date calculation with a consistent base date for employment (industrial and office uses).
17. As such we would be grateful if the Council could please prepare and submit to us a set of tables that update Tables 5.5 and 6.4 of the Employment Land Review (document EBED1) to include the 'residual' position (i.e. the delivery surplus or deficit) in terms of floorspace. This should also be supplemented by the 'residual position' relative to the indicative jobs figures provided in Table 2.1 of the London Plan having regard to the number of jobs delivered between 2016 and the base date of the Plan, and then up to 2025 in Hounslow respectively (for industrial and offices). In addition, corresponding updates

should also be provided in the context of Table 6.1 of the London Plan in terms of office employment and floorspace demand, and the 'residual position' to reflect any net additions and losses of such employment/floorspace from 2016 up to the base date of the Plan.

18. With regard to the above, we also ask for the Council's views on whether this evidence is capable of being produced to take into account the 2024/25 financial year, and how long this may take to prepare those updates as part of a new Employment Background Explanatory Note.

Energy and Carbon Reduction

19. The Council responses to the Regulation 19 consultation in the Regulation 22 Consultation Statement (document S8) refer to the option of producing a topic paper relating to energy and carbon reduction to pull together the evidence base findings which underpin the Council approach. To assist the effectiveness of the examination, we request that the Council prepare that topic paper and confirm in response to this letter when we can expect it to be submitted.

Superseded Policies

20. Regulation 8(5) of the 2012 Regulations requires that the Plan makes clear which policies are superseded. However, it is not abundantly clear which adopted development plan policies would be superseded by the Plan. Please could you provide us with a suggested main modification (e.g. a table showing which development plan policies would be superseded) to ensure the effectiveness and regulatory compliance of the Plan in these regards.

Examination Documents

21. The procedural aspects of the examination will follow the Planning Inspectorate's Procedure Guide for Local Plan Examinations¹ - a copy of which should be included on the examination website. In addition, as part of our initial preparation we have noticed that a number of documents that are mentioned in the Plan are not currently included in the examination library. We would, therefore, be grateful if the Council could undertake a thorough review of the Plan and rectify the omissions from the examination library of any documents, by adding those documents as soon as possible.

Conclusion

22. This letter includes questions and requests, some of which will require the Council to undertake further work. We appreciate that this may take some time to address fully and robustly. However, to ensure that progress on the examination keeps moving efficiently, we request that the Council respond by **no later than Monday 1 September 2025**. This should explain your position with respect to our initial questions and requests. We assume that given the extent of work requested it may not be possible to complete all of the work

¹ <https://www.gov.uk/government/publications/examining-local-plans-procedural-practice>

raised in this letter by that date, so we ask that you set out a reasonable timetable by **no later than Monday 1 September 2025** for providing the information and clarifications that we seek.

23. Please publish this letter on the examination website. If anything in the preceding paragraphs is unclear, please do not hesitate to contact us via the Programme Officer. Following receipt of your response and information requested in this letter, we hope to be able to advise you on how we consider that the examination shall proceed. That may include further questions prior to publishing our MIQs.
24. We are not inviting further submissions from any other party at this stage and will set out in due course when representors may make further submissions. For the avoidance of doubt, other than the information specifically requested by us in this letter, no further representations, evidence or other written material should be submitted to the examination by any party at this stage of the examination.

Yours sincerely

J Ayres

G Wildgoose

INSPECTORS