



Ms J Ayres and Mr G Wildgoose
The Planning Inspectorate
C/o Charlotte Glancy,
Local Plan Programme Officer

**London Borough of Hounslow Council
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Friday 29th August 2025

Dear Ms Ayres and Mr Wildgoose,

Examination of the Hounslow Local Plan 2020-2041

Thank you for your letter, dated 17th July 2025 (received by the London Borough of Hounslow (LB Hounslow) on Thursday 24th July 2025) setting out your initial observations, questions and requests for further information regarding Hounslow's Local Plan.

You asked for an initial response no later than Monday 1 September 2025 explaining our position with respect to your initial questions and requests, and a reasonable timetable for providing the information and clarifications that you have sought.

Your comments on the national policy and guidance context for the examination, the treatment of any suggested or potential modifications, and next steps are all noted and understood.

Where it has been possible at this stage to respond to your initial questions or requests for information this has been set out in this letter below. Furthermore, where the Council requires further time to prepare the responses to your initial questions or requests, we have set out timetables for when we expect to provide you with the information you have requested.

INITIAL QUESTIONS AND REQUESTS

Duty to Cooperate

Q1. *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.*

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.



LB Hounslow Response:

The Council are pleased to confirm that the following SoCGs have now been completed and will be added to the examination library:

- [EX5a Statement of Common Ground between LB Hounslow and TfL \(August 2025\)](#)
- [EX5b Statement of Common Ground between LB Hounslow and National Highways \(August 2025\)](#)

As for the remaining SoCGs, please see the table below which sets out information on recent progress and (where possible) an agreed indicative timeframe for completion.

Name of organisation	Progress to date (since submission)	Indicative timeframe for completion
LB Hammersmith & Fulham	<p>An informal Duty to Cooperate meeting was held on 27/08/25 to discuss the emerging work on the LB Hammersmith & Fulham local plan review. Both parties also discussed the SoCG to support LB Hounslow's local plan examination and a draft was provided by LB Hounslow for review by LB Hammersmith & Fulham.</p> <p>Both parties agreed this should be completed by the end of September.</p>	End of September 2025
LB Hillingdon	<p>As set out in our submission document S10 Duty to Cooperate Statement (pp.31-32), the progress prior to submission of the Hounslow Local Plan in June 2025 follows agreement between both parties to enter into a SoCG in January 2025. LB Hounslow then shared a first draft to review in March 2025, and sent a further email chasing a response from LB Hillingdon in May 2025.</p> <p>Following the receipt of the Inspectors' Initial Questions letter, LB Hounslow sent a further email to LB Hillingdon on 01/08/25 drawing the Inspectors' Initial question regarding Duty to Cooperate to their attention and once more, requesting an update.</p> <p>LB Hounslow have not received any further communication from LB Hillingdon. Therefore, despite our best efforts we have not been able to progress the SoCG, or to determine an indicative timeframe for completion in line with your request. LB Hounslow will continue to make every effort to engage LB Hillingdon on this matter and will keep the Inspectors updated on progress in coming weeks.</p>	TBD



Name of organisation	Progress to date (since submission)	Indicative timeframe for completion
LB Richmond Upon Thames	<p>LB Hounslow sent an email to LB Richmond Upon Thames (LBRuT) on 01/08/25 to request an update following the receipt of the Inspectors' Initial Questions letter.</p> <p>The parties are pursuing two separate SoCGs and these will be finalised in parallel but with different target dates for completion:</p> <p>Bilateral LB Hounslow-LBRuT SoCG (in relation to non-heritage matters) – good progress has been made and this is likely to be completed by the end of September.</p> <p>Joint LB Hounslow-RBGK-LBRuT SoCG (design/heritage matters) - good progress has been made, however as this is a joint SoCG also including Royal Botanic Gardens, Kew (RBGK) this is likely to require a slightly longer time to complete to allow all parties to liaise on matters. It is anticipated this will be completed no later than mid-November (21/11/25).</p> <p>The parties have maintained a good level of communication on remaining matters to be addressed within the two statements and have made good progress toward this end.</p>	<p>Bilateral SoCG (non-heritage matters): end of September 2025</p> <p>Joint SoCG with LBRuT and RBGK (design/heritage matters): 21st November 2025</p>
Historic England	<p>Historic England wrote to LB Hounslow on 9th July with an update on progress made with the SoCG and a request for clarification on one or two points.</p> <p>LB Hounslow responded to Historic England on 17th July with a copy of the Design and Heritage Background Paper (2025), and a meeting was held on 30th July to discuss this and the SoCG in general – including the Inspectors' Initial Questions request for an update.</p> <p>A further email exchange took place in the last 2 weeks of July, during which it was agreed that, due to Historic England's capacity issues, work on the SoCG would have to recommence in September, with a mid-October target for completion agreed (17/10/25).</p>	<p>17th October 2025</p>



Name of organisation	Progress to date (since submission)	Indicative timeframe for completion
	Both parties have maintained a good level of communication on remaining matters to be addressed within the statement and have made good progress toward this end.	
The Mayor of London	<p>Greater London Authority (GLA) officers provided a further version 2 document on 21/08/25 for LB Hounslow to review. LB Hounslow have since provided additional information in response to The Mayor's comments by email, as well as verbally during a short meeting was held on 27/08/25.</p> <p>Both parties have maintained a good level of communication on remaining matters to be addressed within the statement and have made good progress toward this end. A completed SoCG is anticipated in coming weeks, and by no later than mid-September (19/09/25).</p>	19th September 2025

In addition to the bodies identified in the Inspectors' Initial Questions letter, the Council would also like to draw your attention to our intention to provide a bilateral SoCG between LB Hounslow and Spelthorne BC. This will update the Joint SoCG agreed between LB Hounslow and Spelthorne BC (January 2025) and will reflect updated positions on strategic matters in relation to the proposed submission draft of the Hounslow Local Plan (as detailed in our S10 Duty to Cooperate Statement, p.28). It is anticipated that this SoCG will be completed and added to the examination library by **mid-October (17/10/25)**.

Strategic Policies

Q2. 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.

LB Hounslow Response:

As requested, the Council has prepared a suggested main modification to make explicit which policies in the Local Plan are strategic policies. The suggested main modification is set out within [Document EX3 - Suggested modification to make explicit which policies are strategic policies](#), which has been added to the Examination Library.

Housing Supply

Q3. 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).

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).

LB Hounslow Response:

The information requested including updates to the Hounslow Background Explanatory Note 2025 (submission document EBSC1) will be provided by 30th September 2025. It will be possible for this update to the Council's 5 year housing land supply to have a base date of 31 March 2024. Unfortunately, this evidence is unable to take into account the 2024/25 financial year. This is because the residential commencements and completions data for year 2024/25 is still being collected and checked for verification and sign off by the GLA as part of this year's 'starts and completions' exercise. Once confirmed, the Housing Flow Return data will then be submitted by the GLA to central Government for processing. As such, the data required will not be confirmed until after this has been published by MHCLG later in the Autumn (2025).

Employment

Q4. *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).*

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.

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.

LB Hounslow Response:



The information requested regarding the latest monitoring data, in the form of an explanatory note as requested, will be provided by Friday 17 October 2025. Unfortunately, as with the housing data referred to above, this evidence is unable to take into account the 2024/25 financial year, as the non-residential commencements and completions data will not be checked and verified until after the Housing Flow Return has been submitted by the GLA and published by MHCLG (please see above response under Housing Supply).

Energy and Carbon Reduction

Q5. *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.*

LB Hounslow Response:

The Council will prepare a topic paper relating to the evidence base findings which underpin the Council's approach to energy and carbon reduction Policy EQ1, and this will be provided by Friday 17 October 2025.

Superseded Policies

Q6. *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.*

LB Hounslow Response:

As requested, the Council has prepared a suggested main modification to make explicit which plan policies in the adopted Local Plan are superseded, and accordingly has also made explicit which plan policies are deleted. The suggested main modification is set out within [Document EX4 - Suggested modification to make explicit which development plan policies are superseded](#), which has been added to the Examination Library.

Examination Documents

Q7. *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.*

LB Hounslow Response:

As requested, the Council has reviewed the Plan and added to the [Examination Library](#) any documents which are referred to in the Plan but were not already available in the



London Borough of Hounslow

[Examination Library](#). These documents have been given the code EX1 followed by a sub reference number (E.g. EX1.01) to simplify the Examination Library for users.

Should you require any further clarification in relation to LB Hounslow's responses provided within this letter and the accompanying examination documents, or our proposed timetable for additional responses that will follow, please do not hesitate to contact me.

Yours sincerely,

Chris Kirk

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