



**London Borough
of Hounslow**

Hounslow Local Plan 2020-2041

Statement of Common Ground

Between

London Borough of Hounslow

And

National Highways

Version no. 3

27/08/2025

1. Introduction

- 1.1. This Statement of Common Ground (SoCG) has been prepared between the London Borough of Hounslow (LBH) and the National Highways (NH). It seeks to inform the independent examination of the proposed submission version of the Hounslow Local Plan 2020-2041 and will be submitted to the Planning Inspector ahead of the examination hearing sessions.
- 1.2. LBH adopted their Local Plan 2015-2030 Volumes 1 & 2 in 2015. As instructed by their Inspector at that time, LBH went on to undertake a partial review of the local plan focusing on 2 key growth areas: the Great West Corridor and Heathrow (known as the 'West of Borough') opportunity areas. Following extensive consultation, LBH submitted three development plan documents (DPDs, one for each area and an update to the Vol.2 Site Allocations DPD) for examination in December 2020, with examination hearing sessions taking place in November/December 2021. Following the hearing sessions, a number of procedural issues were identified which led LBH to withdraw these DPDs and pause work on a Focused Issues Review of the Local Plan Vol.1.
- 1.3. LBH undertook a Regulation 18 consultation between 1st November and 17th December 2023 focusing on a proposal to consolidate the emerging DPDs into a single consolidated Local Plan document, and to update emerging policies in line with relevant considerations. Following this, LBH prepared updates to key evidence base documents and developed the proposed submission version of the Hounslow Local Plan 2020-2041, undertaking a Regulation 19 consultation on the draft Local Plan between 6th September and 28th October 2024. LBH is now in the process of analysing and collating responses received and preparing any additional work required prior to submission to the Secretary of State for examination.
- 1.4. NH are a prescribed body under the Town and Country Planning (Local Planning) (England) Regulations 2012 with responsibilities for managing and improving England's motorways and major A roads. NH have undertaken extensive engagement with LBH throughout the various stages of plan-production to this point. A full record of engagement to date is provided in section 2 below.
- 1.5. The SoCG sets out both parties' agreed positions in relation to strategic matters identified during duty to cooperate meetings and as set out in the NH's Regulation 19 representation received 25th October 2024, and subsequent meetings and correspondence.

2. Background

- 2.1. LBH and the NH (formerly Highways England) have engaged with one another to discuss duty to cooperate matters during the preparation of the draft Hounslow Local Plan 2020-2041.
- 2.2. Prior to commencing the current draft Hounslow Local Plan, this included engagement on the now withdrawn Local Plan Review for the Great West Corridor, West of Borough and Site Allocations DPDs, which led to the production of a [EX004 SOCG LBH and Highways England \(June 2021\).pdf](#).
- 2.3. NH also engaged in the development of the Focussed Issues Review of the Local Plan Vol.1, providing a Regulation 18 response on 23rd July 2022 (late response).

- 2.4. More recently, NH have engaged with LBH on the production of the single Local Plan, now known as the Hounslow Local Plan 2020-2041, providing representations to the Regulation 19 consultation and attending various meetings under the duty to cooperate.
- 2.5. NH attended a Regulation 18 stage duty to cooperate meeting on 5th December 2023. The key matters discussed are listed below:
- The Local Plan process and LBH's plan production timetable;
 - LBH provided an overview of the Local Plan Review to date and the reasons for progressing a consolidated 'single' Local Plan, and taking this to Reg18;
 - NH discussed new Circular 01/2022 and potential implications in the context of The Mayor's Transport Strategy and the new Plan;
 - LBH provided update on engagement to date with Surrey County Council (SCC) including pursuing a SoCG to agree positions on impacts of the road networks in their area – specifically relating to A30/B378 'Bulldog' (Town Lane) junction close to Ashford Hospital; and
 - Both parties discussed continued cooperation on strategic matters relating to the highways network, including option the option of refreshing the SoCG 2020 at a future duty to cooperate meeting at Reg19 stage.
- 2.6. NH did not submit a representation to the Regulation 18 consultation.
- 2.7. NH submitted a representation to the Regulation 19 consultation on the proposed submission version of the Hounslow Local Plan 2020-2041 on 25th October 2024. NH raised issues around insufficient evidence to demonstrate that the Local Plan growth can be accommodated in transport terms on the Strategic Road Network (SRN), and requested additional evidence to demonstrate either that the Local Plan will not have any severe or unacceptable safety impacts on the strategic road network, or that suitable mitigation is included within the Plan with a reasonable prospect of delivery at appropriate junctures in the Plan period.
- 2.8. LBH arranged a duty to cooperate meeting with NH on 22nd November 2024 to discuss the content of their representation. The key matters discussed are listed below:
- Background to engagement thus far (including SoCG 2021);
 - LBH described approach to updating transport and highways evidence to support the proposed submission version of the emerging Local Plan (Local Transport Impact Assessment Update (LTIA) 2024) and how this relates to previous evidence to support the withdrawn Local Plan Review (including WoB and GWC Transport Impact Assessments);
 - NH requested LTIA references previous TIA work – LBH agreed to undertake minor update to provide clarification;
 - Parties discussed need to define the reference case/do-minimum scenarios
 - Parties discussed comparison of emerging and previous Local Plan Growth (residential and employment), including overall numbers, spatial distribution, plan period/housing trajectory, approach to promoting car-free development etc.
 - Parties discussed changing travel behaviour and how this has impacted transport strategy (with additional information to be provided by LBH);

- Parties discussed the consistency of approach NH take to local plan consultations when assessing the potential impact on the SRN;
- Parties agreed next steps for engagement. LBH reiterated that no further modelling will be undertaken, however additional information and clarifications will be provided to address NH's concerns as part of an addendum to the LTIA;
- Parties agreed to a follow-up meeting once this work is completed if required.

2.9. Following this meeting both parties have corresponded by email to address the points raised and progress toward agreeing positions on transport and highways matters:

- Email from NH 03/12/24 confirming information being requested.
- Email from LBH 09/05/25 responding to NH with LTIA Addendum.
- Email from NH 29/05/25 with further comments following review of LTIA Addendum.
- Email from LBH 02/06/25 responding to further comments and confirming further info to be provided.

2.10. Following this extensive correspondence and cooperation between LBH and NH, NH sent an email to LBH on 08/07/2025. Within this email it was confirmed that NH were satisfied that the parking standards within the Plan are robust and that Forecasts used for transport modelling were in accordance with ONS estimates and didn't exceed previous growth models. As a result of this, NH confirmed that further highways modelling would not be required and that development that would occur as a result of the Local Plan would not unduly impact the SRN.

2.11. This SoCG has been undertaken in order to demonstrate the cooperation between both parties, and to set out the agreements reached on the relevant strategic matters relating to the production of the proposed submission version of the Hounslow Local Plan 2020-2041.

3. Strategic Geography

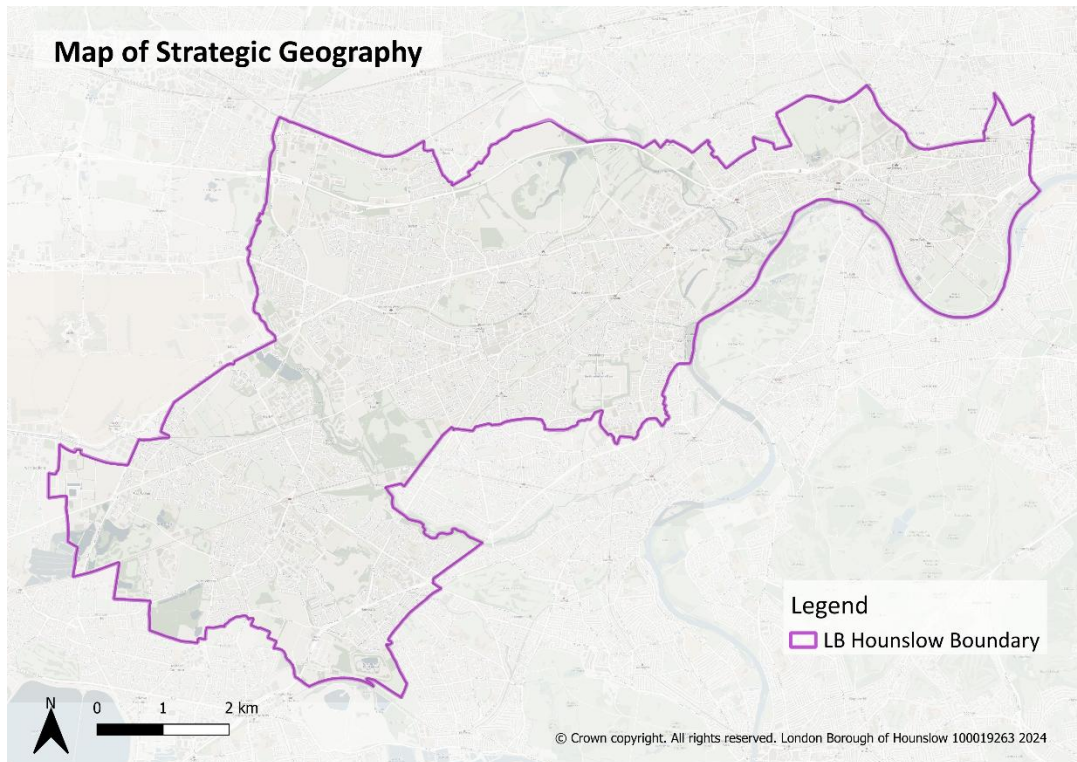


Figure 1: Map of strategic geography

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.

4. Strategic Matters and Record of Agreement

4.1. Through ongoing duty to cooperate engagement between LBH and the NH, the following key strategic matters have been identified:

- **Impacts on the Strategic Road Network (SRN)**
- **Continued Engagement on Highways Matters**

4.2. These matters are set out in more detail below, with a description of the relevant background to the matter in question and a record of agreement provided.

4.3. Impacts on the Strategic Road Network (SRN)

Background

4.3.1. Both parties have engaged on the development of key transport evidence base documents, including LTIA Update (2024) and LTIA Update Addendum (2025), both required to support the proposed submission version of the Hounslow Local Plan 2020-2041.

Record of agreement

4.3.2. In their Regulation 19 Response, NH stated that they had concerns regarding the transport evidence as the modelling previously used had not been extended to 2041. They also raised concerns with the Reference Case and Forecasts used. Since then, LBH have provided an Addendum to the LTIA addressing these concerns.

4.3.3. NH have also confirmed that the parking standards in the emerging plan are sufficiently robust.

4.3.4. NH have now confirmed that the Forecasts used in the LTIA are broadly in accordance with estimates reported by ONS.

4.3.5. Both parties agree that the background growth forecasts for the submitted draft Local Plan do not exceed the background growth modelled previously and that the current housing and employment allocations are sufficiently similar to those modelled previously. Therefore, NH confirm that they are content that further highway modelling is not required for the submitted Local Plan.

4.3.6. Both parties agree that the Strategic Road Network will not be unduly impacted as a result of the proposals set out in the draft submission version of the Hounslow Local Plan.

Outstanding Matters?

4.3.7. There are currently no outstanding issues relating to this matter.

4.4. Continued Engagement on Highways Matters

Background

4.4.1. Both parties have engaged on the Local Plan to date including at Regulation 18 and Regulation 19 where NH have been given the opportunity to comment on the Local Plan 2020-2041 and the supporting evidence base.

4.4.2. Both parties have fulfilled their duty to cooperate throughout the Plan making process and have engaged when necessary.

Record of agreement

4.4.3. London Borough of Hounslow and National Highways will continue to engage and collaborate on highways matters relating to the SRN in relation to the implementation of the emerging Local Plan, and as part of any future plan-making activity.

Outstanding Matters?

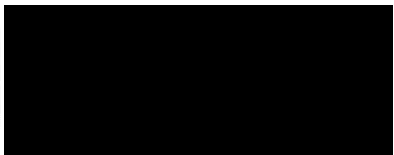
4.4.4. There are currently no outstanding issues relating to this matter.

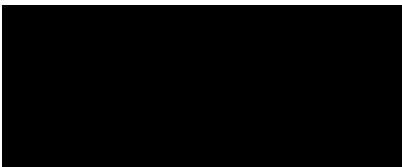
5. Governance Arrangements

5.1. It is agreed that both parties will continue to liaise, as necessary on strategic transport matters within LB Hounslow.

6. Signed confirmation

6.1. The contents of this Statement of Common Ground are agreed for the purposes of the examination of the proposed submission version of the LB Hounslow Local Plan 2020-2041.

Signed on behalf of LB Hounslow		
Name and position	Signature	Date
Vincent Lacovara Director of Planning and Buildings		27-08-25

Signed on behalf of National Highways		
Name and position	Signature	Date
Janice Burgess Spatial Planner		27 August 2025