



**London Borough
of Hounslow**

Hounslow Local Plan 2020-2041

Statement of Common Ground

Between

London Borough of Hounslow

And

London Borough of Hillingdon

Version no. 3

08/10/2025

1. Introduction

- 1.1. This Statement of Common Ground (SoCG) has been prepared between the London Borough of Hounslow (LB Hounslow) and London Borough of Hillingdon (LB Hillingdon). LB Hounslow and LB Hillingdon are neighbouring local authorities, and therefore subject to the duty to cooperate.
- 1.2. This SoCG 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 alongside the local plan and other supporting documents.
- 1.3. LB Hounslow adopted their Local Plan 2015-2030 Volumes 1 & 2 in 2015. As instructed by their Inspector at that time, LB Hounslow 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, LB Hounslow 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 LB Hounslow to withdraw these DPDs and pause work on a Focused Issues Review of the Local Plan Vol.1.
- 1.4. LB Hounslow undertook a Regulation 18 consultation between 1st November and 17th December 2023 focusing on a proposal to consolidate the emerging DPDs into a single Local Plan document, and to update emerging policies in line with relevant considerations. Following this, LB Hounslow 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. LB Hounslow is now in the process of analysing and collating responses received and preparing any additional work required (including agreeing SoCG with relevant parties) prior to submission to the Secretary of State for examination.
- 1.5. LB Hillingdon adopted their Local Plan Part 1 in November 2012, and the Local Plan Part 2 in January 2020. LB Hillingdon are in the process of reviewing their Local Plan, having undertaken an initial 'Call for Views' (Regulation 18) consultation between 29th April and 24th June 2024. Regulation 18 consultation on the Draft Plan version of the Hillingdon Local Plan is programmed for late 2025 / early 2026.
- 1.6. Both parties have undertaken extensive engagement throughout the various stages of plan-production to this point. A full record of engagement to date is provided in Section 2 below.
- 1.7. This SoCG sets out both parties' agreed positions in relation to strategic cross boundary matters identified during duty to cooperate meetings and as set out in subsequent correspondence.

2. Background

- 2.1. LB Hounslow and LB Hillingdon have engaged with one another to discuss duty to cooperate matters during the preparation of the draft Hounslow Local Plan 2020-2041 and Hillingdon's Local Plan Review.

- 2.2. Prior to initiating the current draft of the Hounslow Local Plan, engagement took place on the now-withdrawn Local Plan Review for the Great West Corridor, West of Borough, and Site Allocations DPDs. This process resulted in LB Hillingdon signing up to the [LB Hounslow-LB Hillingdon SoCG \(December 2020\)](#) which was supplemented by an [Updated Response letter from LB Hillingdon \(dated 19th August 2020\)](#) detailing LB Hillingdon’s view on outstanding matters at this time. Both documents were submitted alongside LB Hounslow’s area-based Local Plan Review documents in December 2020.
- 2.3. More recently, LB Hounslow has engaged with LB Hillingdon on the Local Plan Review, and LB Hillingdon has engaged with LB Hounslow on the production of LB Hounslow’s single Local Plan, now known as the Hounslow Local Plan 2020-2041. A timeline of the engagement between both parties (including key consultation stages for each plan) is set out in the table below:

Date	LB Hillingdon Local Plan engagement	LB Hounslow Local Plan engagement
01/11/2023	-	<i>LB Hounslow Regulation 18 Consultation begins</i>
15/11/23	-	DtC meeting held 15 th November 2023 to discuss LB Hounslow Regulation 18 consultation. Key matters discussed: <ul style="list-style-type: none"> • Update on progress since LB Hounslow LPR withdrawal. • Intended progression of the review of the Local Plan as a consolidated single Local Plan with necessary updates. • Review of previous key strategic matters (Green Belt, Gypsies and Travellers and Heathrow). • LB Hounslow single Local Plan timetable. • Update on LB Hillingdon Local Plan Review.
08/12/2023		LB Hillingdon submits a representation to LB Hounslow’s regulation 18 consultation. Key matters raised: <ul style="list-style-type: none"> • Support for consolidation of plan documents to create a single Local Plan. • LB Hillingdon note commitment to take previous LPR engagement into account and append previous consultation responses.
17/12/2023	-	<i>LB Hounslow Regulation 18 Consultation ends</i>
29/04/2024	<i>LB Hillingdon Regulation 18 Consultation begins</i>	-
13/06/2024	DTC Meeting to discuss new LB Hillingdon Reg18 document. Key matters discussed: <ul style="list-style-type: none"> • Housing 	-

	<ul style="list-style-type: none"> • Gypsies, Travellers, and Travelling Showpeople • Employment • Green Belt • Infrastructure (including electrical capacity issue, transport/highways, health and education) • Flooding • Aggregates • Approach to SoCG 	
14/06/2024	<p>LB Hounslow submits a representation to LB Hillingdon's Reg18 'Call for Views' consultation. Key matters raised:</p> <ul style="list-style-type: none"> • Noting of key strategic issues which will need to be addressed by the LB Hillingdon Local Plan Review, as per the consultation document. • Commitment to further engagement when a proposed submission draft Plan document is consulted upon at Regulation 19 stage. • Indication of cross-boundary strategic matters based upon prior engagement, including: <ul style="list-style-type: none"> ○ Green Belt ○ The approach to the Heathrow Opportunity Area ○ Housing growth (including Gypsies, Travellers and Travelling Showpeople needs) ○ Employment growth ○ Heathrow Airport ○ Infrastructure (including highways and transport) 	-
24/06/2024	<i>LB Hillingdon Regulation 18 Consultation closes</i>	-
06/09/2024	-	<i>LB Hounslow Regulation 19 Consultation begins</i>
01/10/2024	-	<p>DTC Meeting to discuss LB Hounslow's proposed submission draft Local Plan (Reg19). Key matters discussed:</p> <ul style="list-style-type: none"> • Housing (including approach to target and Green Belt releases).

		<ul style="list-style-type: none"> • Gypsies, Travellers and Travelling show people (GTTS) accommodation needs and sites. • Employment (including data centres). • Proposed Green Belt releases to meet employment needs (including review of sites). • Highways network impacts. • Heathrow policy approach to runway expansion. • Hillingdon Plan Review Update.
28/10/2024		<p>LB Hillingdon submits a representation to LB Hounslow's Reg19 consultation. Key matters raised:</p> <ul style="list-style-type: none"> • Support for removal of site allocations and green belt release at Heathrow Gateway. • Objection to site allocations and green belt release at Airport Business Park (Site Ref: 57 – Policy P4) and Land South of Western International Market (Site Ref: 77). • Hillingdon Council notes the improvements made to the Hounslow Local Plan by the reduction of Green Belt area proposed for de-designation. • Commitment to further engagement on cross-boundary strategic matters.
28/10/2024	-	<i>LB Hounslow Regulation 19 Consultation closes</i>

2.4. It should also be noted that LB Hounslow and LB Hillingdon are members of the West London Alliance (WLA) Planning Policy Officers Group which provide additional opportunities for cooperation on strategic matters relating to the West London sub-region. Both parties are also cooperating on the production of an update to the joint West London Waste Plan (WLWP).

3. Strategic Geography

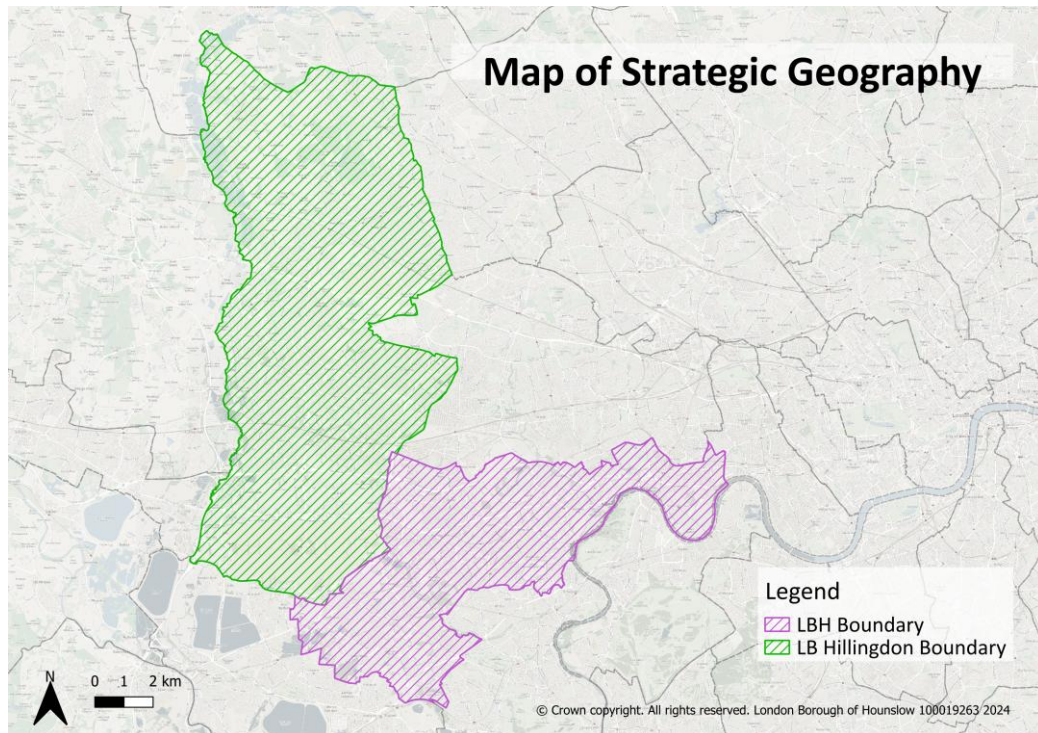


Figure 1: Map of strategic geography

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 and LB Hillingdon.

4. Strategic Matters and Record of Agreement

4.1. Through ongoing duty to cooperate engagement between LB Hounslow and LB Hillingdon, the following key cross-boundary strategic matters have been identified:

- **Green Belt**
- **The approach to the Heathrow Opportunity Area**
- **Employment growth**
- **Housing growth (including Gypsies, Travellers and Travelling Showpeople needs)**
- **Heathrow Airport**
- **Infrastructure (including highways and transport)**

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. In cases where there are matters which cannot be agreed at this time, these are set out as outstanding matters under each matter below.

4.3. Green Belt

Background

- 4.3.1. Green belt release proposals have been a strategic matter for both parties and position were last agreed through the LB Hounslow-LB Hillingdon SoCG (December 2020).
- 4.3.2. Following the withdrawal of West of Borough Local Plan Review document from examination, LB Hounslow has presented a spatial strategy in the emerging Hounslow Local Plan which relies on a limited number of green belt releases to assist in delivering specific needs for logistics/warehousing floorspace in the West of the Borough area. LB Hounslow is no longer proposing to release green belt to assist in meeting housing needs.
- 4.3.3. LB Hillingdon submitted a representation to the Regulation 19 consultation on the proposed submission version of the Hounslow Local Plan 2020-41. In their representation, LB Hillingdon state that they support the removal of the previously proposed 'Heathrow Gateway' place policy and site allocation (formerly site reference no. 38), and note the improvements made to the emerging Hounslow Local Plan by the reduction of Green Belt area proposed for de-designation.
- 4.3.4. However, LB Hillingdon maintain objections to two remaining site allocations for employment uses which would involve green belt release: 'Airport Business Park' (now known as 'Land at Hatton Fields - Site Allocation: 57, and Place Policy P2 C); and 'Land South of Western International Market' (Site Allocation: 77). The representation presents summaries of the explanations provided in their letter dated 13th October 2021 which is appended to their Regulation 19 representation.

Record of agreement

- 4.3.5. LB Hillingdon supports the removal of the Heathrow Gateway allocation and place policy as set out in the now withdrawn West of Borough DPD (2020) from the emerging Hounslow Local Plan 2020-41.
- 4.3.6. LB Hounslow will present a modification to the proposed green belt boundary mapping in the Policy Map and as shown on Map 2 within Appendix 2 – ‘Land Proposed To Be Released From The Green Belt To Meet Development Needs’ to align the area to be released from the green belt in this location with the proposed red-line boundary for emerging site allocation 77 - Land South of Western International Market.
- 4.3.7. Metropolitan Green Belt is a strategic cross boundary matter for LB Hounslow and LB Hillingdon given that areas of designated green belt land span both boroughs’ respective administrative boundaries.
- 4.3.8. If proposals to amend the green belt close to the administrative boundary between LB Hounslow and LB Hillingdon are determined to be sound through the Examination in Public of the emerging Hounslow Local Plan, opportunities will be sought to maintain a strong green belt boundary between the boroughs.

Outstanding Matters?

- 4.3.9. LB Hillingdon object to the release of Land at Hatton Fields (Site Allocation: 57, and Place Policy P2 C: Land at Hatton Fields) and Land South of Western International Market (Site Allocation: 77), and state that the allocations should be removed to make the emerging plan sound (see Appendix A for details).
- 4.3.10. LB Hounslow consider that exceptional circumstances have been demonstrated to release land at the sites known as Land at Hatton Fields and Land South of Western International Market from the green belt to meet specific needs for warehousing and logistics floorspace in the West of the Borough area. LB Hounslow do not agree that these sites should be removed to make the emerging plan sound (see Appendix A for details).
- 4.3.11. Both parties have engaged with one another on this matter as per the duty to cooperate, however no agreement has been reached on how to resolve this objection.

4.4. The approach to the Heathrow Opportunity Area

Background

- 4.4.1. Both authorities share part of a designated Opportunity Area known as the Heathrow Opportunity Area within the Heathrow/Elizabeth Line West Growth Corridor (London Plan 2021). London Plan Policy SD1 Opportunity Areas establishes an indicative capacity for 13,000 homes and 11,000 jobs in Table 2.1.

Record of agreement

- 4.4.2. LB Hounslow has defined the boundary for its part of the Heathrow Opportunity Area through the emerging Hounslow Local Plan 2020-2041.

4.4.3. Details on LB Hillingdon’s approach to the Heathrow Opportunity Area will be available when the Council undertakes the next stage of Local Plan consultation, scheduled for late 2025 to early 2026.

4.4.4. Both parties will continue to engage with one another and with the Mayor of London in relation to the Heathrow Opportunity Area.

Outstanding Matters?

4.4.5. There are no outstanding issues related to this matter at this time.

4.5. Employment Growth

Background

4.5.1. Both parties have shared the findings of their respective employment evidence base studies during duty to cooperate meetings.

4.5.2. Hillingdon’s Employment Land Review and Capacity Study (2023) estimates employment floorspace demand over the plan period is between 207,328sqm and 246,141sqm. This scenario is based on higher employment densities aligning with the London Plan evidence base. Regarding supply the Employment Land Review and Capacity Study considers the existing pipeline of development and provides intensification scenarios for future development. The moderate scenario estimates between 112,459 sqm and 53,374 sqm surplus capacity and the maximum intensification scenario estimates between 285,679 sqm and 266,594 sqm surplus capacity (Hillingdon Employment Land Review and Capacity Study 2023, page 123). Hillingdon’s adopted supply and demand target figures will be established within the draft Local Plan.

4.5.3. LB Hounslow’s Employment Land Review Update 2024 (or ELR 2024) identifies a requirement for 255,600 sqm of additional industrial floorspace (255,300 sqm allowing for completions and permissions) in the West of the Borough area¹, and 208,200 sqm of net additional industrial floorspace (194,400 sqm allowing for completions and permissions) in the remainder of the borough during the period 2020-41. In terms of office floorspace (comprising offices and workshop floorspace), the ELR 2024 identifies a requirement for 204,621 sqm of additional floorspace over the period 2019-43 (197,240 sqm once completions and permissions are taken into account).

4.5.4. LB Hounslow has undertaken a capacity assessment of available sites across the borough. LB Hounslow has allocated existing sites for industrial intensification and has also needed to allocate additional new sites for additional employment development through selective releases from the Green Belt (in line with LB Hounslow green belt review evidence). Overall, LB Hounslow are seeking to allocate 138,600 sqm of net additional industrial floorspace (163,600 sqm gross floorspace) in

¹ The West of the Borough area corresponds to that part of the Mayor’s Heathrow Opportunity Area within LB Hounslow as defined through the emerging proposed submission version of the Hounslow Local Plan 2020-41.

the West of the Borough area; 86,300 sqm of net additional industrial floorspace (210,900sqm gross floorspace) in the remaining areas of the borough; and 61,200 sqm of net additional office floorspace (182,700 sqm gross floorspace) across the borough.

Record of agreement

- 4.5.5. LB Hounslow is seeking to meet a significant proportion of its employment floorspace needs as identified through the ELR Update 2024. LB Hounslow does not have any spare employment floorspace capacity to assist LB Hillingdon in meeting its unmet needs.
- 4.5.6. LB Hillingdon is seeking to meet its employment floorspace needs. Details will be published when the Local Plan goes to Draft Plan stage late 2025 or early 2026. LB Hillingdon does not have any spare employment floorspace capacity to assist LB Hounslow in meeting its unmet needs.
- 4.5.7. Both parties acknowledge the robustness of one another's evidence base for employment needs.

Outstanding Matters?

- 4.5.8. There are no outstanding issues related to this matter at this time.

4.6. Housing Growth (including Gypsy, Traveller and Travelling Showperson accommodation)

Background

- 4.6.1. LB Hillingdon and LB Hounslow are London boroughs, and as such their strategic housing targets are established through the London Plan. The London Plan (2021) Policy H1 'Increasing housing supply' sets the following 10-year targets for net housing completions at Table 4.1:
- LB Hillingdon: 10,830 dwellings (or 1,083 per annum/dpa)
 - LB Hounslow: 17,820 dwellings (or 1,782 per annum/dpa)
- 4.6.2. LB Hounslow is seeking to meet their 10-year London Plan housing target, and has derived housing targets for the remainder of the plan periods in line with the approach set out at paragraph 4.1.11 of the London Plan (2021).
- 4.6.3. LB Hounslow has produced the Hounslow Local Housing Needs Assessment update (2024) to support their draft plan, which seek to ensure that the housing provided meets the needs of the population in terms of tenure, type and size.
- 4.6.4. Details on LB Hillingdon's approach to the meeting housing targets will be available when the Council undertakes the next stage of Local Plan consultation, scheduled for late 2025 to early 2026.
- 4.6.5. In terms of meeting Gypsy, Traveller and Travelling Showperson (GTTS) accommodation needs, both parties have undertaken evidence to identify the level of need over the plan period.

- 4.6.6.LB Hounslow commissioned a Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTTSANA) (2019) to establish objectively assessed housing needs for these groups.
- 4.6.7.LB Hounslow has a demonstrated need for 26 Gypsy and Traveller pitches and 12 Travelling Showpeople plots over the period from 2018-2033. This forms the basis of LB Hounslow's GTTS housing target in the emerging Hounslow Local Plan².
- 4.6.8.LB Hounslow has demonstrated exceptional circumstances to release two sites from the green belt in order to fully meet its targets for Gypsy, Traveller and Travelling Showpeople accommodation: Land North of Church Road, Cranford; and Land South of Bedford Road, Feltham.
- 4.6.9.LB Hillingdon is waiting for the results of the GLA's Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment, which is underway. This will set the housing need for which the Local Plan will respond.

Record of agreement

- 4.6.10. LB Hounslow is planning to meet its London Plan 2021 10-year housing target, and its capacity-based target for the remaining years of the plan period to 2041 (in line with London Plan paragraph 4.1.11). LB Hounslow does not have any spare housing capacity to assist LB Hillingdon in meeting its unmet needs.
- 4.6.11. LB Hillingdon is planning to meet its London Plan 2021 10-year housing target. LB Hillingdon does not have any spare housing capacity to assist LB Hounslow in meeting its unmet needs.
- 4.6.12. LB Hounslow is planning to meet its targets for Gypsy and Traveller and Travelling Showpeople accommodation. LB Hounslow does not have any spare capacity to assist LB Hillingdon in meeting its unmet GTTS needs.
- 4.6.13. LB Hillingdon is planning to meet its share of GTTS accommodation needs. LB Hillingdon does not have any spare capacity to assist LB Hounslow in meeting its unmet GTTS needs.
- 4.6.14. Both parties acknowledge the robustness of one another's evidence base for housing and GTTS.
- 4.6.15. Both parties note the early work being undertaken to review the London Plan and will continue to engage with the review process.

Outstanding Matters?

- 4.6.16. There are no outstanding issues related to this matter at this time.

² In accordance with Policy H14 of the London Plan, which states boroughs must include ten-year GTTS targets in their Development Plan Documents.

4.7. Heathrow Expansion

Background

- 4.7.1. Both parties have engaged on matters relating to the impact of the proposed expansion of Heathrow Airport in relation to the now withdrawn Hounslow Local Plan Reviews for the West of Borough and Great West Corridor DPDs.
- 4.7.2. Previous Heathrow expansion proposals were left in abeyance following COVID19 lockdown related impacts upon the aviation industry. LB Hounslow developed the emerging Hounslow Local Plan under the assumption that Heathrow expansion would not take place within the plan period. Emerging policy EC4 Heathrow sets the Council's strategic policy approach toward Heathrow.
- 4.7.3. On 29/01/2025 the UK Government announced renewed support for Heathrow expansion and confirmed that it will be undertaking a review of the Airports National Policy Statement (ANPS). The Government also confirmed it will be inviting proposals for a third runway at Heathrow to be brought forward by Summer 2025.
- 4.7.4. LB Hounslow is a member of the Heathrow Strategic Planning Group (HSPG) and regularly attends the Spatial Planning Group to discuss strategic planning matters relating to Heathrow Airport.
- 4.7.5. LB Hillingdon is not a member of the HSPG.

Record of agreement

- 4.7.6. Both parties will continue to monitor the situation with regards to Heathrow expansion and will revisit this statement of common ground if necessary.

Outstanding Matters?

- 4.7.7. There are no outstanding issues related to this matter at this time.

4.8. Infrastructure (including highways and transport)

Background

- 4.8.1. Both parties have previously discussed strategic matters relating to highways impacts with regard to the now withdrawn Hounslow Local Plan Reviews for the West of Borough and Great West Corridor DPDs. LB Hillingdon most recently raised this as an area of concern in their 19th August 2020 letter written alongside the previous LB Hounslow-LB Hillingdon SoCG (December 2020).
- 4.8.2. At that time, LB Hillingdon acknowledged that in an Heathrow 'expansion off' scenario the cumulative impacts upon the highway network will be lessened, however it was considered to be unclear how the proposed growth scenario can be brought forward without greater certainty on the southern rail access to Heathrow, on which much of the increase in capacity relies. LB Hillingdon stated that Southern

rail access benefits from no formal planning position which should attract weight in plan-making.

4.8.3. The emerging Hounslow Local Plan 2020-41 Spatial Strategy does not include growth in the Bedfont Lakes Neighbourhoods and Heathrow Gateway place policy areas and site allocations. As such, the previously raised area of concern has been superseded by events.

4.8.4. LB Hounslow have previously produced a Strategic Transport Study with TfL for the Great West Corridor (GWC) opportunity area, and a Highways Impact Assessment (HIA) focusing on the West of Borough area to support our previous local plan review work. This work was updated in 2024 with a borough-wide Hounslow Local Transport Impact Assessment Update (2024) which looked in particular at the potential impact of extending the plan period to 2041. The report considers the changes to site allocations since the previous HIA work was undertaken and analysis suggesting that overall travel demand in terms of households and jobs will reduce by 2041 (particularly in relation to post-COVID effects upon the latter). The report concludes that the findings of the previous assessment work remains robust and that, on balance, undertaking additional strategic transport modelling to cover the extension of the plan period to 2041 would not further inform the assessment of the Local Plan and its impact on the road network.

4.8.5. The proposed New Southern Access to Heathrow remains a key strategic transport infrastructure project as set out in emerging Policy EC1 Strategic Transport Connections, and in the Infrastructure Delivery Plan.

Record of agreement

4.8.6. Both parties agree to keep each other updated as infrastructure evidence is produced and as discussions with key stakeholders (including infrastructure and service providers) continue.

4.8.7. Both parties will engage with one another if any relevant cross boundary transport matters arise, or if further infrastructure projects are found to be necessary.

4.8.8. Both parties agree to cooperate on the prioritisation of cross-boundary sustainable transport and active travel options in order to reduce reliance on the private car and to tackle congestion.

Outstanding Matters?


4.8.9. There are no outstanding issues related to this matter at this time.

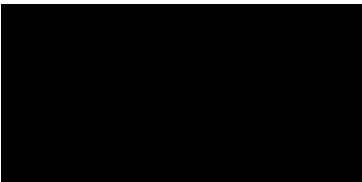
5. Governance Arrangements

- 5.1. It is agreed that informal discussions will occur between both parties on the cross boundary issues and strategic matters referred to in this Statement of Common Ground in the form of officer level meetings at least once every twelve months, with reporting of matters to Member level if necessary. This is in addition to the opportunities for further inter-borough collaboration on strategic matters through the WLA.
- 5.2. It is agreed that this Statement of Common Ground will be reviewed by both parties at a joint duty to cooperate meeting which will be held on an annual basis.

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		08/10/2025

Signed on behalf of LB Hillingdon		
Name and position	Signature	Date
Julia Johnson Director Planning and Sustainable Growth		23/09/2025

APPENDIX A: Table of Outstanding Matters

Description of matter/s which remains outstanding	LB Hounslow comments	LB Hillingdon comments	Agreed next steps
<p>LB Hillingdon object to the release of Land at Hatton Fields (Site Allocation: 57, and Place Policy P2 C: Land at Hatton Fields) for the following reasons:</p> <ul style="list-style-type: none"> • The Green Belt Review concluded that the site is still performing moderately well against the purposes of its designation. • The additional industrial floorspace was not justified as the Local Plan was planning for a significant overprovision of industrial floorspace against identified need. • Heathrow expansion does not justify an exceptional circumstance due to the uncertainty of the project progressing during the plan period, and if progressed would justify preparation of a revised Local Plan due to the scale of change needed. • The proposal fails the exceptional circumstances test for development Green Belt land. <p>LB Hillingdon state that the allocation should be removed to make the emerging plan sound.</p>	<p>LB Hounslow maintain that exceptional circumstances have been demonstrated to release this site from the green belt in line with our Green Belt Review evidence.</p> <p>LB Hounslow disagree that there is an 'overprovision of industrial floorspace against identified need' as stated. In fact, even with this site included we are still in deficit against our identified employment land needs for industrial floorspace. This is set out in the ELR Update 2024 and in emerging Policy ED1.</p> <p>LB Hounslow maintain that Heathrow expansion is not part of the justification for the release of this site from the green belt. The ELR Update 2024 need position is not predicated on Heathrow expansion.</p> <p>LB Hounslow do not consider it necessary to modify the plan to remove the site allocation.</p>	<p>LB Hillingdon maintains the objection to the release of this Green Belt land for development.</p>	<p>Both parties have engaged with one another on this matter as per the duty to cooperate, however no agreement has been reached on how to resolve this objection.</p>

<p>LB Hillingdon object to the release of Land South of Western International Market (Site Allocation: 77) for the following reasons:</p> <ul style="list-style-type: none"> • The allocation would remove a continuous extent of Green Belt from Heston to the north of Cranford Park, which currently provides a separation between built developments in the two boroughs. • Hillingdon Council does not agree that the site makes a less important contribution to the wider strategic Green Belt. • Its release would result in only a very narrow strip of remaining Green Belt land to the west of the A312, thus impacting the purposes of this land and the shared area of Green Belt that exists between the two local authorities. • The Green Belt Review concludes that the site performs moderately when viewed in isolation. <p>LB Hillingdon state that the allocation should be removed to make the emerging plan sound.</p>	<p>LB Hounslow maintain that exceptional circumstances have been demonstrated to release this site from the green belt in line with our Green Belt Review evidence.</p> <p>LB Hounslow maintain that the boundary changes proposed are fully justified by the evidence and exceptional circumstances assessment.</p> <p>LB Hounslow do not consider it necessary to modify the plan to remove the site allocation.</p>	<p>LB Hillingdon maintains the objection to the release of this Green Belt land for development.</p>	<p>Both parties have engaged with one another on this matter as per the duty to cooperate, however we have not been able to come to an agreement on how to resolve this objection.</p>
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