



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 17th October 2025

Dear Ms Ayres and Mr Wildgoose,

Examination of the Hounslow Local Plan 2020-2041 – Response to Initial Questions 4 and 5 and Question in IN02 Regarding Duty to Cooperate

Further to my previous letters of 29th August and 30th September 2025, I now write in response to initial questions 4 and 5 in your letter of 17th July 2025 (IN01) regarding employment data (Q4), and energy and carbon reduction (Q5). As requested in your letter of 15th September 2025 (IN02), I am also able to provide clarification of the approach taken with respect to the Duty to Cooperate prescribed bodies¹ where it is not intended to provide an up-to-date and signed Statement of Common Ground.

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.

LBH Response:

The Council has prepared a new Employment Background Explanatory Note which includes the information you have requested. For reference, this examination document is called **[EX9 – Employment Background Explanatory Note, October 2025](#)** and has been added to the Examination Library.

¹ As identified in the Town and Country Planning (Local Planning) Regulations 2021



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.*

LBH Response:

The Council has prepared an Energy and Carbon Reduction Topic Paper incorporating the evidence base findings which underpin the policy approach to these topic areas in the Local Plan. For reference, this examination document is called [EX10 – Energy and Carbon Reduction Topic Paper, October 2025](#) and has been added to the Examination Library.

Duty to Cooperate

I am pleased to confirm that since I last wrote to you on 30th September 2025, the following SoCGs have now been completed and have been added to the examination library:

- EX5e – [Statement of Common Ground between LB Hounslow and the Mayor of London \(October 2025\)](#)
- EX5f – [Statement of Common Ground between LB Hounslow and LB Hillingdon \(October 2025\)](#)

Follow up question in paragraph 3 of IN02 – Inspectors’ Response to LB Hounslow (15th September 2025)

In addition to the above, referring back to our initial letter dated 17 July 2025, it would assist us if the Council could supplement the responses in their previous letter with specific clarification of the approach taken with respect to the Duty to Cooperate prescribed bodies² where it is not intended to provide an up-to-date and signed Statement of Common Ground. We would be grateful if this information could be provided by not later than 17 October 2025. Following the Council submission of the documents in accordance with the dates indicated in the letter of 29 August 2025 and this requested information, we may have further questions prior to publishing our Matters, Issues and Questions for the examination hearings.

LBH Response:

As requested, we are now providing specific clarification of the approach LB Hounslow has taken with respect to the Duty to Cooperate (DtC) prescribed bodies as identified in the Town and Country Planning (Local Planning) Regulations 2021, where it is not intended to provide an up-to-date and signed Statement of Common Ground (SoCG).

As set out in submission document S10 - [Duty to Cooperate Statement](#), the prescribed bodies identified in Regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012 are those listed at paragraph 3.2 of the document. Document S10 then provides a summary of duty to cooperate engagement in a table below paragraph 4.2 of the document. This table demonstrates at which stage duty to cooperate engagement

² As identified in the Town and Country Planning (Local Planning) Regulations 2021



requests were sent to each body (i.e. at both Regulation 18 and Regulation 19 stages), and where we have or have not pursued a SoCG with each body. Those bodies who have either not responded at all to our requests for engagement under the DtC, or who have engaged but did not confirm that they wish to undertake or update a SoCG, are listed below:

- Natural England - no response to DtC meeting requests, did not respond to request to undertake a SoCG.
- Civil Aviation Authority - no response to DtC meeting requests, did not respond to request to undertake a SoCG.
- Integrated Care Board (ICB/HUDU) - responded to DtC request at Reg19 (but did not respond to request to update SoCG).
- Office of Rail and Road - no response to DtC meeting requests, did not respond to request to undertake a SoCG.
- Marine Management Organisation - no response to DtC meeting requests, did not respond to request to undertake a SoCG.
- Local Nature Partnership (GLA and London Wildlife Trust) - no response to DtC meeting requests, did not respond to request to undertake a SoCG.
- Local Enterprise Partnership (London Enterprise Panel, GLA) - no response to DtC meeting requests, did not respond to request to undertake a SoCG.

Further information is then provided in the detailed duty to cooperate engagement tables within Section 5 ('Regulation 18 Stage') and Section 6 ('Regulation 19 to Submission Stage') of document S10 - [Duty to Cooperate Statement](#), at 'Table 2 Prescribed Bodies' in both cases (pp. 18-27 and pp. 39-55, respectively). For ease of reference, information relating to these prescribed bodies has been provided in a single table covering both Regulation 18 and Regulation 19/submission stages in this letter at *Appendix 1 - Approach taken with Duty to Cooperate prescribed bodies where it is not intended to provide a Statement of Common Ground*. This content has been supplemented with minor points of clarification where appropriate, so is not a direct replication of the tables in document S10, though much of the content remains the same.

Finally, in relation to LB Hounslow's SoCG with the Historic England, I am aware that in my letter of 29th August I provided an indicative completion timeframe of 17th October 2025. Both parties have maintained a good level of communication on remaining matters to be addressed within the SoCG and I am able to confirm that significant progress has been made. There are, however, a number of matters in the SoCG that require further discussion, given the amount of material the document covers. It is therefore unlikely that the SoCG will be completed before early November. Please accept our apologies for this delay.

Should you require any further clarification in relation to LBH's responses provided within this letter and the accompanying examination documents, please do not hesitate to contact me.



London Borough of Hounslow

Yours sincerely,

Chris Kirk

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Appendix 1 – Approach taken with Duty to Cooperate prescribed bodies where it is not intended to provide a Statement of Common Ground

Prescribed Body	Regulation 18 Stage					Regulation 19 to Submission Stage				
	Engaged at Reg 18 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps	Engaged at Reg 19 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
Natural England	Y	No	No response to meeting request at Reg18 stage (email sent 20/10/2023). Note: IIA Scoping Paper response received 20/11/23.	N/A	LBH to contact again at Reg19 stage to request engagement under duty to cooperate.	Y	No	No response to DtC meeting request at Reg19 stage (email request sent 06/09/2024, and chased 03/10/2024). N.B. NE submitted a representation to the Reg19 consultation on 03/10/24 confirming 'no comment' on the consultation for the Local Plan - Reg 19.	N/A	LBH will continue to make efforts to engage with NE in line with the duty to cooperate as part of future plan making activity.
Civil Aviation Authority	Y	No	No response to meeting request at Reg18 stage (email sent 20/10/2023)..	N/A	LBH to contact again at Reg19 stage to request engagement under duty to cooperate.	Y	No	No response to DtC meeting request at Reg19 stage (email request sent 06/09/2024 and chased 03/10/2024).	N/A	LBH will continue to make efforts to engage with CAA in line with the duty to cooperate as part of future plan-making activity.
Integrated Care Board (ICB)/	Y	No	No response to meeting request at	N/A	LBH to contact again at Reg19 stage to	Y	22/10/2024	LB Hounslow DtC meeting (Reg 19): 22/10/24 LBH and ICB/HUDU	A follow up email was sent on	LBH will continue to make efforts



Prescribed Body	Regulation 18 Stage					Regulation 19 to Submission Stage				
	Engaged at Reg 18 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps	Engaged at Reg 19 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
London Healthy Urban Development Unit (HUDU)			Reg18 stage (email sent 20/10/2023).		request engagement under duty to cooperate.			Regulation 19 duty to cooperate meeting takes place. Key matters discussed: <ul style="list-style-type: none"> • Discussion on Health Impact Assessments (HIA), including validation requirements • Concerns raised about service accessibility for vulnerable Gypsy and Traveller communities, particularly on Greenbelt land, with LBH setting our allocation process for sites • Discussion on Specialist Housing and Co-Living, including importance of adaptable housing for older people and targets for provision • Community infrastructure including potential objections to health infrastructure within allocations • Discussion around site allocations including 	27/01/25 asking whether ICB/HUDU wish to enter into a SoCG. A chasing email was sent 12/03/25. No response to these requests has been received either at the point of submission or thereafter.	to engage with ICB/HUDU as part of the current plan examination if required, and for any future plan- making activity.



Prescribed Body	Regulation 18 Stage					Regulation 19 to Submission Stage				
	Engaged at Reg 18 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps	Engaged at Reg 19 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
								health/community floorspace N.B. ICB/HUDU submitted a representation for the Reg19 consultation on 28/10/24.		
Office of Rail and Road	Y	No	No response to meeting request at Reg18 stage (email sent 20/10/2023)..	N/A	LBH to contact again at Reg19 stage to request engagement under duty to cooperate.	Y	No	No response to DtC meeting request at Reg19 stage (email request sent 06/09/2024, and chased 03/10/2024).	N/A	LBH will continue to make efforts to engage with ORR in line with the duty to cooperate as part of future plan-making activity.
Marine Management Organisation	Y	No	No response to meeting request at Reg18 stage (email sent 20/10/2023).	N/A	LBH to contact again at Reg19 stage to request engagement under duty to cooperate.	Y	No	No response to DtC meeting request at Reg19 stage (email request sent 06/09/2024, and chased 03/10/2024).	N/A	LBH will continue to make efforts to engage with MMO in line with the duty to cooperate as part of future plan-making activity.
Local Nature Partnership	Y	No	No response to meeting	N/A	LBH to contact again at Reg19	Y	No	No response to DtC meeting request at Reg19 stage (email	N/A	LBH will continue to



Prescribed Body	Regulation 18 Stage					Regulation 19 to Submission Stage				
	Engaged at Reg 18 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps	Engaged at Reg 19 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
(GLA and London Wildlife Trust)			request at Reg18 stage (email sent 20/10/2023). Note: LWT provided representation to Reg18 via consultation portal.		stage to request engagement under duty to cooperate.			request sent 06/09/2024, and chased 03/10/2024). N.B. Engagement has taken place with GLA officers as part of engagement with The Mayor of London (see above).		make efforts to engage with those groups which make up the LNP for Hounslow in line with the duty to cooperate as part of future plan-making activity.
Local Enterprise Partnership (London Enterprise Panel, GLA)	Y	No	No response from LEP to meeting request (email sent 20/10/2023). Meeting held with GLA local plans team (see above).	N/A	LBH to contact again at Reg19 stage to request engagement under duty to cooperate.	Y	No	The GLA's website confirms that London's LEP closed in 2023: https://www.london.gov.uk/who-we-are/london-partnership-board/londons-localenterprise-partnership-2012-2023 . As such, no response has been received to requests for engagement (on 06/09/2024 or 03/10/2024). N.B. Engagement has taken place with GLA officers as part of engagement with The Mayor of London (see above).	N/A	N/A