



**London Borough
of Hounslow**

Hounslow Local Plan 2020-2041

Statement of Common Ground

Between

London Borough of Hounslow

And

**The Mayor of London
(Greater London Authority, GLA)**

**Version no. 4
06/10/2025**

1. Introduction

- 1.1. This Statement of Common Ground (SoCG) has been prepared between the London Borough of Hounslow (LBH) and The Mayor of London (The Mayor). 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 alongside the local plan and other supporting documents.
- 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 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 (henceforth known as the draft Local Plan), 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 (including agreeing SoCG with relevant parties) prior to submission of the draft Local Plan to the Secretary of State for examination.
- 1.4. The Mayor of London (as head of the Greater London Authority, GLA) is a prescribed body under the Town and Country Planning (Local Planning) (England) Regulations 2012 with responsibilities for strategic planning in Greater London – specifically the production of the spatial development strategy for London, also known as the London Plan.
- 1.5. The Mayor has undertaken extensive engagement with LBH throughout the various stages of plan-production to this point. Much of this engagement has focused around ensuring that the draft Local Plan is in general conformity with the London Plan, as per requirements set out in section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. A full record of engagement to date is provided in section 2 below.
- 1.6. The 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 The Mayor's Regulation 19 representation (originally submitted 25th October 2024, with a corrected version received 21st January 2025).

2. Background

- 2.1. LBH and The Mayor 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. This previous round of engagement culminated in the production of the [LBH and the Mayor of London SoCG \(May 2021\)](#).
- 2.3. The Mayor also engaged with LBH during the production of the Focussed Issues Review of the Local Plan Vol.1, providing a Regulation 18 response on 16th November 2022. Whilst this focussed review of Volume 1 did not progress to Regulation 19 stage due to the decision made by LBH to pursue a consolidated single Local Plan, the comments provided by The Mayor did inform early drafting of several Volume 1 policy updates which were taken forward in the emerging Local Plan.
- 2.4. More recently, The Mayor has engaged with LBH on the production of the emerging draft Local Plan, providing representations to both the Regulation 18 and Regulation 19 consultations, as well as attending various meetings under the duty to cooperate.
- 2.5. The GLA's local plan team (on behalf of The Mayor) attended a Regulation 18 stage duty to cooperate meeting on 22nd November 2023 (alongside colleagues from Transport for London, or TfL). The key matters discussed at this time included:
 - LBH's progress with its Local Plan Review to date and the reasons for progressing a consolidated 'single' Local Plan and taking this to Reg18.
 - The status of previous comments submitted to previous plan review consultations and the scope of the emerging plan. LBH confirmed all previous comments considered and scope has been extended to cover all policy areas.
 - Request that the consultation does not occur within pre-election period for Mayoral elections.
 - Confirmation of the review and consolidation process, along with necessary updates to policies where required.
 - Updates related to The Mayor's Planning for London programme which inform upcoming London Plan review, including various engagement events. The Mayor also provided updates on emerging London Plan Guidance (LPG).
 - The Mayor's new digital London SHLAA platform
 - Discussion of key general conformity matters:
 - Housing
 - Employment
 - Metropolitan Open Land (MOL) and Green Belt (GB)
 - Possible impact of the introduction of National Development Management Policies (NDMPs)

- 2.6. Both parties agreed to continue engagement and to review strategic matters once the proposed submission version of the draft Local Plan has been published. The Mayor provided a representation to the Regulation 18 consultation on 15th December 2023 confirming support for consolidating and updating the separate local plan volumes together into a single Local Plan, and for the stated updates - including those to address previously raised general conformity matters. The Mayor also appended previous comments to recent LBH local plan review consultations to his response.
- 2.7. A Regulation 19 stage duty to cooperate meeting was held on 30th September 2024. The following strategic and general conformity matters were discussed:
- Approach to housing (specifically the approach to establishing housing need beyond 2029 and the application of guidance at London Plan 2021 paragraph 4.1.11);
 - Approach to employment (specifically discussion around Classes E and B, appropriate employment designations, meeting industrial floorspace demand, and approach to green belt releases for employment sites);
 - Approach to green belt changes;
 - Approach to energy policies;
 - Approach to tall buildings (specifically reference to 'maximum heights', the interaction of policy approach with Royal Botanic Gardens, Kew World Heritage Site (WHS) and the interpretation of 'Outstanding Universal Value'); and
 - Approach to Gypsies, Travellers and Travelling Showpeople accommodation.
- 2.8. A follow up meeting was held on 24th October 2024 related to emerging approach to green belt releases to meet employment floorspace demand, but also covering future housing need and further discussion of tall buildings and the WHS.
- 2.9. The Mayor submitted a representation to the Regulation 19 consultation on the proposed submission version of the draft Local Plan on 25th October 2024. A separate response to LBH's request for The Mayor's opinion on the general conformity of the proposed draft Local Plan with the London Plan 2021 was received on 15th November 2024.
- 2.10. A follow-up meeting was held on 21st January 2025 to allow officers to discuss the Mayor's comments set out in his representation, and to agree next steps to complete a SoCG between both parties. Following this meeting an updated version of the Mayor's Regulation 19 representation with minor corrections was received 21st January 2025.
- 2.11. This SoCG has been undertaken in order to demonstrate the cooperation between both parties, and to set out the agreements reached on relevant strategic matters, and to ensure the proposed submission version of the Hounslow Local Plan 2020-2041 is in general conformity with the London Plan 2021.

3. Strategic Geography

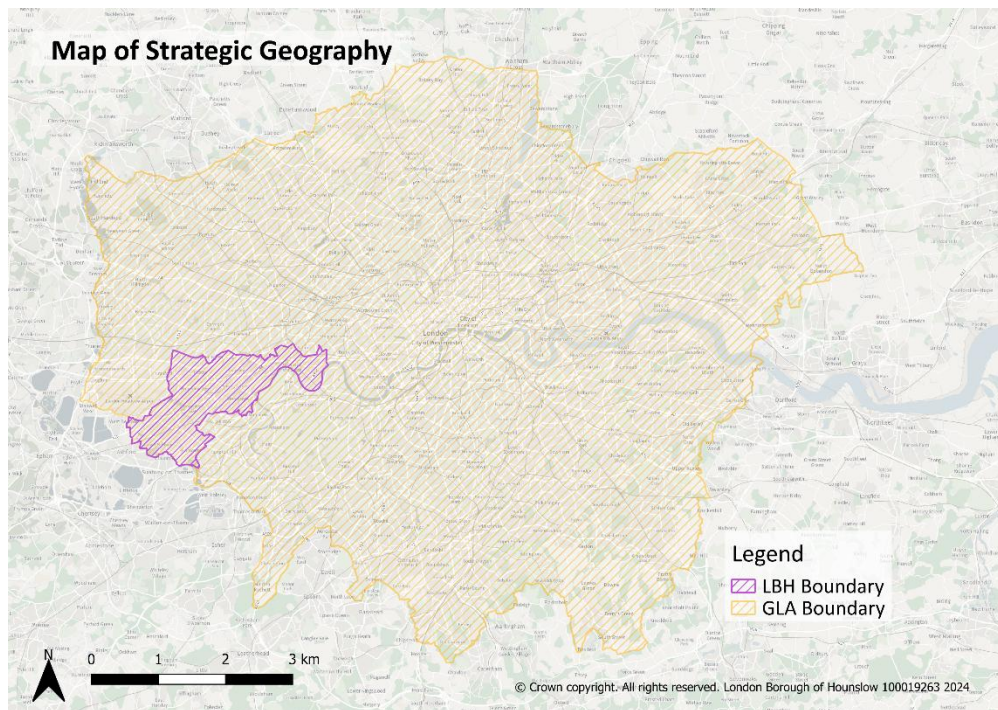


Figure 1: Map of strategic geography

- 3.1. Figure 1 contains a map of the strategic geography considered for cooperation on strategic matters as part of this Statement of Common Ground. The area contains the administrative area of LB Hounslow and the Greater London region (the strategic area covered by the London Plan).

4. Strategic Matters and Record of Agreement

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

- General Conformity
- Spatial Strategy
- Housing (including affordable housing and Gypsy and Traveller accommodation)
- Green Belt
- Industrial Capacity
- Tall Buildings
- Burial Space
- Waste and Aggregates
- Transport
- Site Allocations

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 (with any agreed modifications that Hounslow will present to the Inspector as part of the Examination process set out in the table at Appendix A below).

4.3. General Conformity

Background

4.3.1. In his Regulation 19 representation, The Mayor notes the withdrawal of the area based development plan documents (DPDs) for the Great West Corridor and West of the Borough opportunity areas, and the subsequent work to combine, into a single document, the area based documents with an updated Local Plan Volume 1 and 2. The Mayor highlighted 2 general conformity objections raised in respect of the withdrawn DPDs which were considered to be outstanding at the point of the Regulation 18 stage consultation on the single Local Plan, as set out in his December 2023 representation. The general conformity matters related to:

- The proposed approach to industrial / capacity, and
- The proposed release of Green Belt for residential and employment development.

4.3.2. The Mayor has confirmed that considerable progress has since been made and the proposed submission version of the draft Local Plan has addressed many issues raised previously. The Mayor confirms that there are a number of important concerns and these are set out in his Regulation 19 representation, however the significant progress and changes made now mean that the draft Local Plan is more closely aligned with the London Plan 2021, and it is now the Mayor's opinion that the draft Local Plan is in general conformity with the London Plan 2021.

Record of agreement

4.3.3. Both parties agree that the proposed submission version of the draft Local Plan is in general conformity with the London Plan 2021.

4.3.4. LB Hounslow has worked with The Mayor to address the concerns set out in his Regulation 19 representation, and this work is summarised in this SoCG.

Outstanding Matters?

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

4.4. Spatial Strategy

Background

4.4.1. In his Regulation 19 representation, The Mayor notes that the strategic approach is based on eight core objectives which are closely aligned with the Mayor's good growth objectives.

4.4.2. The Mayor notes the draft Local Plan adopts a spatial strategy which divides the borough into ten districts based on the borough's Characterisation and Growth Study, and emphasises that LBH is home to two Opportunity Areas (OAs): the Great West Corridor and the part of the Heathrow OA that lies within the borough. The Mayor states that the London Plan 2021 sets out indicative capacity figures for homes and new jobs at Table 2.1. The Mayor notes that the draft Local Plan at paragraph 2.57 treats the Heathrow OA indicative jobs capacity figure as a target to deliver 11,000 jobs, and states that when developing policies for Development Plans, boroughs should use these figures as a starting point, to be tested through the assessment process.

4.4.3. The Mayor states that the proposals map should be amended to show the precise boundaries of the OA as this is currently unclear. The Mayor also states that the PDF version of the draft Local Plan policies map does not clearly identify other designations such as proposed designations of new industrial areas in the Green Belt, and suggests that it would be helpful if this could be addressed.

4.4.4. Both parties met on 21st January 2025 to confirm the approach to addressing The Mayor's Regulation 19 comments.

Record of agreement

4.4.5. LBH agree to present a modification to the draft Local Plan to ensure the OA boundary is more clearly shown on the proposals map 'Figure SS1: Spatial Strategy for Ten Districts' (see Appendix A below). Furthermore, LBH agree to supply the OA boundaries layers to the GLA to input on to The Mayor's London Plan website and for use as a GIS layer in the GLA's mapping system once the draft Local Plan has been adopted.

4.4.6.LBH agree to present modifications to the draft Local Plan to correct known issues with the PDF version of the Policies Map.

4.4.7.LBH consider that amending the Policy Map to show new employment designations is not a sound approach, however we agree to present a modification to the map supporting the Economic Development chapter at 'Fig ED1: Economic Development land in the Borough' in order to identify new LSIS designations on both proposed green belt release sites and existing employment sites (see Appendix A below).

Outstanding Matters?

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

4.5. Housing (including affordable housing and Gypsy and Traveller accommodation)

Background

4.5.1.In his Regulation 19 representation, The Mayor notes and welcomes emerging Policy SC1 which conforms to LBH's housing target as set out in Table 4.1 of the London Plan 2021 for the delivery of 17,820 new homes between 2019 and 2029, and incorporates a small site housing target of 2,800 new homes. The Mayor notes the plan period starts in 2020/21 but requests that the draft Plan demonstrate what level of housing delivery has taken place from 2019/20 (when the London Plan (2021) 10 year target begins), with any additional shortfall being added to remaining years up to 2029/30.

4.5.2. The Mayor notes that LBH has followed the guidance set out in paragraph 4.1.11 of the London Plan 2021 to determine a housing target beyond the 10 year target to 2029/30, and that this provides a lower target per annum than the period up to 2029. The Mayor sets out the strategic context for considering increased future housing need in London, taking into consideration the new London-wide housing need figure generated by the updated standard method in the NPPF 2024. The Mayor highlights work to prepare the new Housing and Land Availability Assessment (SHLAA) and the next London Plan which will apportion targets across London boroughs. Given this, the Mayor states a preference that LBH roll forward their current borough housing target beyond 2029/30.

4.5.3. The Mayor states that LBH should explore all the mechanisms at their disposal to facilitate all sources of housing supply including from small housing site development, and advises that further clarity should be provided on what small housing site delivery has been in the borough since 2019. The Mayor advises LBH to follow guidance in London Plan Policy H2B, and the Small Sites Design Codes LPG1.

4.5.4. The Mayor welcomes Policy SC2 in the draft Local Plan which reflects the Mayor's strategic target that 50 percent of all housing is to be affordable, and the intention to apply a 70/30 affordable housing tenure split in favour of low-cost housing at social rent levels, consistent with the London Plan 2021 (policies H4 and H6). The Mayor also supports the inclusion of the threshold approach to affordable housing set out in his policy H5.

4.5.5. The Mayor notes LBH's evidence for Gypsy, Traveller and Travelling Showperson accommodation needs and the two sites identified to accommodate these needs, which will go some way to meeting these needs over the Plan period. The Mayor states that to be consistent with Policy H14 of the LP2021, LBH should clearly set out their ten-year pitch targets and how they plan to meet those needs in full. The Mayor states that if LBH cannot meet their ten-year pitch requirements this would be a general conformity issue.

4.5.6. At the follow up meeting on 21st January 2025, both parties discussed these matters further. LBH agreed to:

- Update housing supply figures to reflect data from 2019 instead of 2020 in the forthcoming Housing Background Paper, and to present a proposed modification to add a footnote in Policy SC1 of the Local Plan to reflect this (see appendix A).
- Present a modification to set out the 10 year target for Gypsy, Traveller and Travelling Showperson accommodation target in Policy SC9 of the Local Plan, and to set out the policy approach to meeting the target (see appendix A).

4.5.7. LBH reiterated that the approach to housing need follows the approach set out in paragraph 4.1.11 of the London Plan (2021) and noted the future housing need which will be apportioned through the new London Plan. Both parties acknowledged this might mean the draft Local Plan will need to be reviewed following the publication of the Draft new London Plan. The Draft new London Plan is currently planned to be published for consultation in Spring 2026 and adopted by early 2028¹.

4.5.8. LBH raised a point around the adopted LB Hounslow Character, Sustainability and Design Codes SPD which provides housing design codes for small sites, and this was noted by The Mayor's representative.

Record of agreement

4.5.9. LBH agree to present a proposed Modification to add a footnote in Policy SC1 to explain that Hounslow's housing supply figures, including completions during monitoring year 2019-20 are set out in the forthcoming Housing Background

¹ Timetable for the next London Plan: <https://www.london.gov.uk/programmes-strategies/planning/london-plan/next-london-plan>

Explanatory Note, and also to explain that 257 homes will be added to Hounslow's housing target to be delivered by 2029, accounting for previous under delivery in monitoring year 2019-20 (see appendix A).

4.5.10. LBH agree to present a proposed Modification to set out the borough's 10 year pitch and plot target for Gypsy, Traveller and Travelling Showperson accommodation in Policy SC9 of the Local Plan and the policy approach to meeting the target (see appendix A).

Outstanding Matters?

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

4.6. Green Belt

Background

4.6.1. In his Regulation 19 representation, The Mayor notes that there are five sites proposed for release from the Green Belt as identified in Appendix 2 of the draft Plan. These are proposed to be designated as industrial land and the resulting loss of Green Belt would be 44.81ha.

4.6.2. The Mayor notes that he previously raised objections to the proposed Green Belt release in the withdrawn version of the Local Plan (Vol.3 West of Borough DPD). The Mayor notes the approach is centred on the specific industrial needs required by Heathrow, and states that as the industrial uses proposed are considered to be inappropriate development in the Green Belt, LBH will need to establish the necessary exceptional circumstances required by national policy to justify their release.

4.6.3. At the follow-up meeting on 21st January 2025, LBH confirmed that an Exceptional Circumstances background paper is being produced to document the selection process for Green Belt release. Both parties also discussed the implications of new NPPF (2024) changes to national Green Belt policy, including the introduction of grey belt.

Record of agreement

4.6.4. LBH considers that there are exceptional circumstances to justify green belt release, including the significant shortfall in the ability to meet employment land requirements and specialist accommodation for Gypsies, Travellers and Travelling Showpeople without such releases.

4.6.5. In June 2025, LBH published a Green Belt Background Paper (incorporating Exceptional Circumstances Assessment) and Annex Report. The Mayor of London notes the exceptional circumstances advanced by LBH in these documents

Outstanding Matters?

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

4.7. Industrial Capacity

Background

4.7.1. In his Regulation 19 representation, The Mayor welcomes clarity added to emerging Policy ED1 in terms of establishing a strategic need for industrial floorspace in the west of the borough (138,600sqm) and for the remaining areas of the borough (86,300sqm). The Mayor welcomes this, but requests that LBH should establish how much of this need is for Class B uses, and to focus on this in designated industrial areas.

4.7.2. The Mayor notes Policy ED1 A proposes five new industrial areas on land to be released from the Green Belt in order to meet industrial needs in the west of the borough area, with this land to be designated as Locally Significant Industrial Sites (LSIS). The Mayor states that if exceptional circumstances can be established, these sites should be designated as Strategic Industrial Land (SIL) as that would provide a more focused mechanism to help accommodate Class B uses. The Mayor also states that further clarity be provided around how and why these sites have been selected in particular.

4.7.3. The Mayor notes that Policy ED2 Part E states that an area of the Great West Corridor SIL is proposed to be made available for co-location and is to lose its SIL designation, with compensation to be provided through SIL extension via proposed site allocation 8, 9 and 10. The Mayor states this is generally positive, but requests more details to be provided on gains and losses of SIL resulting from the proposed reconfiguration, and how the draft Local Plan will ensure that the proposed reconfiguration will not hinder LBH in meeting its industrial capacity needs over the plan period.

4.7.4. The Mayor requests the draft Plan include a clear commitment to monitor industrial capacity over the life of the Plan, consistent with the approach in London Plan Policy E4C and with a focus on monitoring Class B uses to ensure this type of capacity is increased to meet established identified need. Monitoring should be set against the evidence of potential capacities established in the evidence for specific industrial sites.

4.7.5. At the follow-up meeting on 21st January 2025, The Mayor's GLA representatives clarified the reasons for focusing on Class B rather than Class E uses – especially in SILs. LBH drew attention to the Article 4 Direction came in to force in April 2025 as a means of controlling conversions of Class E to residential in existing designated employment areas. Both parties also discussed the draft Local Plan approach to data centres, and LBH's established practice of monitoring employment floorspace and the challenges of controlling E Class uses within flexible industrial applications.

Record of agreement

4.7.6. LBH consider it is not necessary to modify the plan to establish how much of the strategic need for industrial floorspace need is for Class B uses only, or to focus on this metric in designated industrial areas, to address soundness concerns.

4.7.7. LBH consider that to ensure consistency green belt release sites should remain designated as new LSIS as these sites meet the definition of LSIS and provide appropriate level of protection, which is further supported by site requirements (specifying B2/B8 use only) in the site allocations which ensure adequate protection of the sites as LSIS designations. This is also the approach taken for existing medium-large sized industrial sites in the West of the Borough. LBH also consider that the requested change to SIL designation would not address soundness concerns, and would in any case require consultation with landowners which is not possible at this late stage in the plan making process.

4.7.8. Both parties agree that the designation of these proposed new LSIS sites as SIL could be investigated as part of the next local plan review. This would provide the opportunity for an appropriate evidence base to be compiled to ensure this would be fully justified, and to allow appropriate public consultation to be undertaken.

4.7.9. LBH will set out details on gains and losses of SIL designated land in the GWC resulting from the proposed reconfiguration in the forthcoming Employment Background Paper.

4.7.10. LBH will continue to monitor Class B uses as per adopted and proposed monitoring frameworks. We note the GLA's suggestion around monitoring against proposed employment quanta on allocated sites and will investigate ways to display this within future AMRs.

4.7.11. LBH agrees to present a modification to Policy ED1 clause G. to ensure that individual sites allocated in the plan will be delivered in a manner that will meet identified needs, and to ensure that permissions resulting from allocations do not unintentionally allow movement to other use classes by way of current or future permitted development rights (see Appendix A).

Outstanding Matters?

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

4.8. Tall Buildings

Background

4.8.1. In his Regulation 19 response, The Mayor states that whilst the emerging Policy CC3 approach to proposing two tall buildings definitions is consistent with London Plan

Policy D9, the corresponding Figure CC 3.1 map contains large blank areas where it is not clear what constitutes a tall building. The Mayor requests further clarity around tall building definitions is provided across the whole borough.

- 4.8.2. The Mayor notes that whilst the series of maps illustrating areas that may be suitable for tall buildings is broadly consistent with London Plan 2021 Policy D9B, it is recommended that broader locations should be identified. The Mayor suggests that clarity should be provided as to what harms would accrue should a building exceeding the relevant tall building definition come forward to assist with decision-making.
- 4.8.3. The Mayor notes the use of the term 'maximum permissible' heights in the locations identified as suitable for tall buildings, but advises LBH to use the term 'appropriate heights' instead as per Policy D9.
- 4.8.4. The Mayor notes the proximity to the Royal Botanic Gardens Kew World Heritage Site (WHS) in neighbouring LB Richmond upon Thames. The Mayor welcomes policy commitments to work with Royal Botanic Gardens Kew WHS, LB Richmond and Historic England to conserve and enhance the Outstanding Universal Value (OUV) of the WHS, but advises that LBH should be more specific about how they intend to meet the requirements of London Plan 2021 Policy HC2 in relation to conserving, promoting, actively protecting and interpreting the OUV of the WHS.
- 4.8.5. The Mayor notes the Tall Buildings Study 2024 has analysed views from the WHS but suggests that it is not clear how the study has informed the building height strategy in Brentford Town centre or elsewhere in the borough, specifically, in relation to OUV of the WHS.
- 4.8.6. The Mayor advises that a single borough-wide map illustrating areas that may be suitable for tall buildings would be more practical than the current series of individual maps in emerging policy CC3. The Mayor also advises that it may be more beneficial to identify a height range on the map and move the more detailed indicative layouts and massing scenarios to the site allocations to provide flexibility.
- 4.8.7. At the follow-up meeting on 21st January 2025, The Mayor's GLA representatives clarified comments in relation to mapping modification requests, the importance of providing clear evidence of potential harm to support development management officers in their decision-making, and signposted to The Mayor's regulation 19 response to the City of London's local plan in relation to the impact of tall buildings on the Tower of London World Heritage Site, which highlighted the importance of objectively defining the parameters and extent of the OUV of a WHS and how to protect it.
- 4.8.8. LBH confirmed that the Great West Corridor Masterplan addresses the potential impacts of tall buildings upon the OUV of the Kew Gardens World Heritage Site.

Record of agreement

- 4.8.9. LBH agree to present a proposed modification to figure CC3.1 that covers all the areas of the borough not covered by the High Scale tall building definition with the Lower Scale tall buildings definition. This is set out in Appendix A.
- 4.8.10. LBH consider that the tall buildings evidence base does not support identifying broader locations for tall buildings, as it tests the impacts of tall buildings based on modelling on specific sites, therefore extending the broader locations could have unintended consequences.
- 4.8.11. LBH consider that the potential harms that could arise from exceeding tall building appropriate heights can be found in the evidence base for the Tall Buildings Policy (the Tall Buildings Study and the Great West Corridor Masterplan).
- 4.8.12. LBH agree to present a modification to amend the reference to 'Maximum permissible heights' to 'Appropriate heights'. This is set out in Appendix A.
- 4.8.13. LBH agree to present a modification to include a single borough-wide map illustrating areas that may be suitable for tall buildings, however the series of individual maps will also be necessary as the detail would not be visible on one large map. LBH therefore agree to present a modification to amend the height annotations on the maps, keeping only the cluster/site codes, which cross reference with the table. This is set out in Appendix A.
- 4.8.14. LBH consider it is not necessary to present any modifications to site allocations to include layouts and massing scenarios. It is considered this would be an unnecessary repetition of the table in CC3 and the tall buildings evidence base.
- 4.8.15. LBH agree to present modifications to expand policy CC4 to include requirements to respond to London Plan policy HC2, as set out in Appendix A. The GLA acknowledges that there are ongoing heritage discussions between LBH, Historic England, Royal Botanic Gardens, Kew and London Borough of Richmond-upon-Thames which may potentially lead to further modifications being proposed.
- 4.8.16. LBH consider that the evidence base has informed the building heights strategy in relation to OUV of the RBG Kew WHS and has produced an explanatory note (see Appendix C) for the GLA to clarify the approach to the tall building site in Brentford and its relationship with the WHS; the Mayor acknowledges the note which provides helpful further context with regard to the proposed application of Policies CC3 and CC4. The tall building site heights in Brentford Town Centre have been assessed from views from Kew Gardens, but was not visible from any of the locations identified in the Royal Botanic Gardens Kew WHS Management Plan. The Great West Corridor Masterplan addresses the potential impacts of tall buildings on the OUV of the Kew

Gardens World Heritage Site. LBH therefore consider that no modifications are required to address matters of soundness.

Outstanding Matters?

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

4.9. Burial Space

Background

4.9.1. In his Regulation 19 response, The Mayor noted that while draft Local Plan Policy GB9 seeks to protect existing burial space, it does not state what the borough's burial space needs are over the Plan period. The Mayor states that to be consistent with Policy S7 of the LP2021, LBH should ensure provision is made for different burial requirements, and that the approach should be informed by a needs assessment including an audit of existing provision and opportunities for the re-use of burial space. The Mayor urges LBH to follow this guidance accordingly.

4.9.2. At the follow-up meeting on 21st January 2025, The Mayor's representatives provided some elaboration on the comment at LBH's request and explained that this issue has risen to prominence recently with the ongoing work to review the London Plan. The Mayor's representative highlighted a GLA Study on Burial Space from 2011, and confirmed that GLA are due to undertake a London-wide burial space study to support the new London Plan. The GLA representative also confirmed that comments made in the Regulation 19 representation are intended to be advisory rather than to raise a specific general conformity matter relating to this issue.

4.9.3. At the meeting, LBH confirmed the approach to burial space provision in Policy GB9 which seeks to avoid the loss of burial space provision, and drew attention to the fact that Place Policy P2(c): Land At Hatton Meadows supports a potential expansion of the Hatton Cemetery on site, and that this is also included within the corresponding Site Allocation 57 Land at Hatton Fields illustrative diagram. As such, the draft Local Plan is planning positively for burial space provision.

4.9.4. This matter was not included in The Mayor's Regulation 18 consultation response.

Record of agreement

4.9.5. Both parties agree that it would not be possible to produce this piece of evidence to inform the draft Local Plan at this late stage in the plan preparation process.

4.9.6. LBH consider that the assessment of burial needs is better conducted at either the London-wide or sub-regional levels, rather than focusing an assessment at the borough level.

4.9.7. The Mayor has committed to produce a London-wide burial space study to inform the review of the London Plan and will share findings of this piece of evidence with LBH at the earliest opportunity.

4.9.8. LBH agree, based on the London-wide burial space study findings, to raise the possibility of undertaking a sub-regional burial space needs assessment through the West London Alliance (WLA) Planning Policy Officers Group in future.

4.9.9. Both parties agree to cooperate together, and with other stakeholders, to better understand strategic burial space needs in the West London area, including through the London Plan review process.

Outstanding Matters?

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

4.10. Waste and Aggregates

Background

4.10.1. In his Regulation 19 representation, The Mayor notes that the adopted joint West London Waste Plan (WLWP) 2015 is considered to be out-of-date. The Mayor states that Policy EQ7 of the draft Plan is therefore reliant on an out-of-date waste strategy as it was based on the apportionments set out in the 2011 version of the London Plan, and that the draft Local Plan does not adequately demonstrate LBH's ability to meet its waste apportionment targets for household, commercial and industrial waste as set out in the published London Plan 2021 (Table 9.2).

4.10.2. The Mayor does note that a review of the WLWP is underway but is at an early stage of preparation, and would like to see a commitment from LBH about how its apportionment needs will be met and how they are planning to meet waste needs beyond those apportioned over the Plan period. The Mayor suggests that, as a minimum, Policy EQ7 should seek to clearly protect existing waste sites until the joint waste plan is completed, at which point it will form part of LBH's Development Plan and will set out the strategic approach for the sustainable management of waste in accordance with the London Plan 2021.

4.10.3. At the follow-up meeting on 21st January 2025, LBH explained that as the review of the West London Waste Plan was underway, it would not be appropriate to create over-lapping, and therefore potentially conflicting, strategic policies relating to waste planning within the draft Local Plan. LBH have now confirmed – alongside other WLWP

local planning authorities – an update to the WLWP plan production programme in the Local Development Scheme (2025) which seeks to target the Government’s December 2026 submission deadline, with an indicative adoption date in early 2028.

4.10.4. The Mayor’s representative acknowledged the issue, whilst suggesting that it is unlikely that West London will be able to meet its London Plan 2021 apportionment of waste. The GLA representative went on to suggest the designation of new LSIS (or other appropriate industrial employment designations as per Industrial Capacity matter above) may present opportunities for the development of waste facilities and this could at least demonstrate the potential to address local apportionment until the WLWP has been updated. The representative also stated that The East London Waste Plan may also provide surplus capacity that can be shared across London.

4.10.5. LBH are now able to confirm that initial evidence base findings suggest that the West London area will be able to meet its London Plan waste apportionment up to 2041. As such, LBH is in a good position to meet its waste needs, and it is anticipated that the current plan programme for the review of the WLWP should be able to proceed as planned. Further details will be published as part of the Regulation 18 consultation on the new West London Waste Plan in coming months.

4.10.6. LBH noted The Mayor’s position on the potential of newly designated LSIS (or SIL) land to provide further opportunities for the development of waste facilities.

Record of agreement

4.10.7. LBH will continue to progress with the review of the WLWP as this work is already in train, and will, alongside the other WLWP LPAs, continue to cooperate with The Mayor throughout plan preparation in line with the duty to cooperate, and to ensure general conformity with the London Plan (2021).

4.10.8. LBH will continue to safeguard waste sites identified in the WLWP 2015, until such time as the new WLWP is adopted and new safeguarded sites and/or waste site allocations have been confirmed. A modification is agreed to Policy EQ7 and supporting text to enhance signposting to the WLWP and the London Plan policy SI 9.

4.10.9. LBH agree to share waste evidence base findings with the Mayor at the earliest appropriate time, providing agreement to do so has been secured with the other WLWP LPAs.

4.10.10. Both parties will continue to work together on waste matters throughout the review of the London Plan.

Outstanding Matters?

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

4.11. **Transport**

Background

4.11.1. In his Regulation 19 representation, The Mayor welcomes the policies and site allocations in the draft Local Plan which aim to rebalance the transport system towards walking and wheeling, cycling and public transport; to promote car free or low car developments; and apply a Healthy Streets Approach to deliver liveable neighbourhoods. Additionally, The Mayor welcomes the broad support for public transport and active travel improvements and the specific support for West London Orbital, including the intention to secure transport improvements as mitigation for development impacts.

4.11.2. The Mayor suggests that the map of strategic transport connections and improvements could be enhanced to clearly illustrate the Council's aspirational walking and cycling network in line with the Sustainable Transport, Walking and Cycling London Plan Guidance, published in November 2022.

4.11.3. At the follow-up meeting on 21st January 2025, both parties discussed the Mayor's support for transport policies and the suggested mapping modifications. LBH advised the Mayor's representatives that no show stopping issues were highlighted by Transport for London (TfL), and that proposed mods will be agreed through a separate SoCG.

Record of agreement

4.11.4. LBH notes the supportive comments received on walking and wheeling, cycling and public transport; car free or low car developments; the healthy streets approach and on public transport and active travel improvements including specifically for West London Orbital.

4.11.5. LBH notes that within The Mayor's Regulation 19 response is an endorsement of the Regulation 19 representation received from TFL. Matters arising from TFL's representation will be agreed upon in a separate Statement of Common Ground with TFL.

4.11.6. Both parties will continue to work together on Transport matters throughout the review of the Plan.

Outstanding Matters?

4.11.7. There are no outstanding issues between LBH and The Mayor related to this matter at this time.

4.12. Site Allocations

Background

- 4.12.1. In his Regulation 19 representation, The Mayor notes that emerging site allocations set out capacity assumptions and welcomes this for allowing monitoring of site development progress (and as a requirement of London Plan 2021 Policy D1B).
- 4.12.2. The Mayor has provided detailed comments in relation to several site allocations in his representation. Some of these comments were discussed in more detail during the follow-up meeting on 21st January 2025.

Record of agreement

- 4.12.3. LBH agree to present proposed Modifications for the following site allocations set out in the table at Appendix A – Table of Agreed Modifications: Site reference IDs - 3, 5, 6, 7, 13, 49, 67, 90, 92, 97.
- 4.12.4. LBH ask that the position in respect of the site allocations set out in the table below is noted and agreed.

| Site | GLA Comment in Reg 19 Rep | LBH Comment |
|-----------------------|--|--|
| 3 Gillette Factory | The site is currently entirely designated as SIL. Fig ED1 of the draft Plan poorly illustrates that some of the area will lose its industrial designation. Clarity on this would be helpful and could be provided in the allocation images to identify clearly the area to be de-designated. | Modification to be presented – see Appendix A. |
| 5 – West Cross Campus | There is an existing waste site within this allocation. The intention should be to protect and maintain the waste capacity of the facility until at least the current review of the WLWP is completed. If the waste use is to be released before that time, compensatory capacity will need to be provided in accordance with LP2021 Policy SI9C. The allocation | LBH is aware of the safeguarded waste use operating out of Unit 8 Amalgamated Drive, West Cross Ind Park, within the site boundary. The site is referred to as 'Rentokil Initial Services Ltd' in the safeguarded sites list at Appendix 2 of the WLWP 2015 with 'Clinical Waste Transfer' given as the site activity. The site is now known as 'Initial Washrooms (Brentford) Service Centre' in the EA's Waste Data Interrogator (WDI). Recent WDI data collected for the |

| Site | GLA Comment in Reg 19 Rep | LBH Comment |
|---|---|---|
| | <p>is currently designated SIL and it should be made explicitly clear how the designation is proposed to change. As written it is not clear if the site will become LSIS or a non-designated industrial site.</p> | <p>review of the WLWP indicates that the site managed c5,500tpa HIC waste at peak in the 5 years since 2019. However as the site is classed as a transfer station its capacity was not counted towards meeting the LP apportionment in the WLWP 2015 and would not be in the new WLWP. The site also handles a small amount of hazardous waste, however as there is no expectation that waste plan areas be self sufficient for hazardous waste management capacity there is no requirement for the 725tpa of hazardous waste management capacity to be re-provided either.</p> <p>It is therefore LBH's intention to release the safeguarding of this site through the new WLWP should this be supported by evidence. However, LBH confirm that should development come forward before the new WLWP is adopted, LBH would seek to apply WLWP 2015 Policy WLWP 2 'Safeguarding and Protection of Existing and Allocated Waste Sites' to ensure compensatory and equal provision of capacity for waste is made elsewhere in the WLWP area as part of any future development of the site.</p> <p>Modification to be presented in respect of de-designation of SIL – see Appendix A.</p> |
| <p>6 BSS Brentford, 7 Profile West Brentford car park, 13 Harlequin Avenue substation, 14 2 Harlequin Avenue,</p> | <p>The site is currently designated SIL and this should be made clearer in the allocation. As written, it is not clear if the site will become LSIS or a non-designated industrial site.</p> | <p>Modification to be presented in respect of de-designation of SIL for sites 6, 7, and 13 – see Appendix A.</p> <p>Site 14 will remain designated SIL – modification not necessary.</p> |
| <p>8 - 971 Great</p> | <p>The proposed allocation</p> | <p>LBH will prepare an Employment</p> |

| Site | GLA Comment in Reg 19 Rep | LBH Comment |
|--|--|---|
| West Road, 9 - Syon Lane Industrial Estate, Road, 10 - 931 Great West Road | would result in an extension to the SIL which lies to the west of the site and this is made clear in the allocation and is noted. It would be beneficial if the site allocation was clear about the gain in SIL floorspace that would result from the proposals including through industrial intensification. In addition, the allocation should only promote Class B uses within the SIL for the reasons set out earlier. | <p>Background Paper prior to Examination. This will include figures for the existing employment floorspace of relevant site allocations as well as any net gains in floorspace based on site minimum development quantum in the proposed site allocations. The Employment Background Paper is considered the most appropriate document to include this information, and taking this approach ensures all relevant site allocations are consistent in respect of this.</p> <p>With regard to promotion of only B use classes in SIL, please see proposed modification to Policy ED1, G. in Appendix A.</p> |
| 22 1020 Great West Road | The proposal is to intensify industrial uses on the site. The site is not currently designated industrial land and as such LBH should consider the benefits of designating the site as LSIS to apply relevant policies in the development plan to development. In addition, the intention should be to focus Class B uses here for the reasons given above. | The site is a standalone allocation, not part of a directly adjacent wider employment area and is relatively small in size (0.3 hectares). It is therefore considered below the appropriate threshold for a LSIS. |
| 23 Texaco Filling Station | The proposal is to intensify industrial uses on the site. The site is not currently designated industrial land and as such LBH should consider the benefits of designating the site as LSIS to apply relevant policies in the development plan to development. In addition, the intention should be to focus Class B uses here for the reasons given above. | The site is a standalone allocation, not part of a directly adjacent wider employment area and is relatively small in size (0.22 hectares). It is therefore considered below the appropriate threshold for a LSIS. |
| 26 Phoenix Business Park | The proposal is to develop industrial uses on the site either on their own or as | The site is currently designated LSIS and is proposed to remain LSIS in the emerging Hounslow Local Plan |

| Site | GLA Comment in Reg 19 Rep | LBH Comment |
|--|---|--|
| | part of co-location mixed use development. The site is not currently designated industrial land and as such LBH should consider the benefits of designating the site as LSIS or SIL to apply relevant policies in the development plan to development. In addition, the intention should be to focus Class B uses here for the reasons given above. | 2020-2041, as identified in the Policies Map. With regard to focussing on B use classes at the site, please see proposed modification to Policy ED1, G. in Appendix A. |
| 27 Kew Bridge Distribution Centre, 36 110 Power Road | The proposal is for co-location of mixed-use development which fits the site's current LSIS designation. The focus should be on meeting non Class E uses which are not affected by permitted development rules. | With regard to focussing on non Class E uses at the site which are not affected by permitted development rules, , please see proposed modification to Policy ED1, G. in Appendix A. |
| 36 110 Power Road | The site is currently designated LSIS and is proposed for industrial intensification which is noted and welcomed. The focus should be on meeting non Class E uses which are not affected by permitted development rules. | With regard to focussing on non Class E uses at the site which are not affected by permitted development rules, , please see proposed modification to Policy ED1, G. in Appendix A. |
| 43 Heathrow International Trading Estate | The site is currently designated as LSIS and the proposed uses are for Class B ones. As such LBH could consider designating the site as SIL which could provide greater protection of industrial capacity in the long term. | To ensure consistency, sites remain designated LSIS, which is the approach taken for medium-large sized industrial sites in the West of the Borough. A change to SIL designation would require consultation with landowners which is not possible at this stage in the plan making process. With regard to focussing on non Class E uses at the site which are not affected by permitted development rights, please see proposed modification to Policy ED1, G in Appendix A. |
| 44 Central Park Trading | This site is one identified for Green Belt release and | To ensure consistency, sites are designated LSIS, which is the |

| Site | GLA Comment in Reg 19 Rep | LBH Comment |
|---|--|--|
| Estate, 46 Ron Smith Recycling, 48 Vacant land at Dick Turpin Way, 57 Land at Hatton Fields | to be designated as LSIS. See earlier comments. | <p>approach taken for existing medium-large sized industrial sites in the West of the Borough. A change to SIL designation would require consultation with landowners which is not possible at this stage in the plan making process.</p> <p>With regard to focussing on non Class E uses at the site which are not affected by permitted development rights, please see proposed modification to Policy ED1, G. in Appendix A.</p> |
| 49 Site at Faggs Road | Part of the proposed site allocation is in Green Belt and as such this should be made explicitly clear. The allocation should be amended accordingly and make it clear which part of the site is to be released from Green Belt designation. | <p>Agree to present modification to site allocation 49 Faggs Road (see Appendix A).</p> <p>Please see also proposed submission Hounslow Local Plan Appendix 2, Map 1 - Land at Hatton Fields and Dick Turpin Lane Green Belt Releases (p.460)</p> |
| 67 Ups House, 90 Inwood Business Park, 92 Upstage, 97 30 Rugby Road, | The site is home to non-designated industrial uses and as such Policy E7C of the LP2021 should be followed. The inclusion of a reference to Policy E7C of the London Plan would be welcomed. Existing industrial capacity on the site should be considered as part of a plan-led approach towards meeting the borough's industrial needs over the Plan period. | <p>Modification to be presented to refer to Policy E7C of the London Plan – see Appendix A.</p> <p>LBH will prepare an Employment Background Paper prior to Examination. This will include figures for the existing employment floorspace of relevant site allocations as well as any net gains in floorspace based on site minimum development quantum in the proposed site allocations. The Employment Background Paper is considered the most appropriate document to include this information, and taking this approach ensures all relevant site allocations are consistent in respect of this.</p> |
| 88 Land at Bridge Road Depot | The site is home to non-designated industrial uses and as such Policy E7C of the LP2021 should be | Policy E7C of the London Plan would not apply in the case of Land at Bridge Road Depot, as the red line boundary of the proposed allocation |

| Site | GLA Comment in Reg 19 Rep | LBH Comment |
|---|---|---|
| | followed. The inclusion of a reference to Policy E7C of the London Plan would be welcomed. Existing industrial capacity on the site should be considered as part of a plan-led approach towards meeting the borough's industrial needs over the Plan period. | for residential development does not include existing industrial buildings at the site. |
| 120 Land north of Church Road, 121 Land South of Bedfont Road | The site is currently designated Green Belt. The proposed use is for Gypsy and Traveller pitches / Travelling Showpeople plots which is not an appropriate use in the Green Belt. As such LBH will need to demonstrate exceptional circumstances to justify the development here. | The allocations state that the sites are proposed to be inset from the Green Belt to meet the specialist housing needs of Gypsies and Travellers/Travelling Showpeople in Hounslow. LBH has prepared an Exceptional Circumstances Background Paper. This includes the demonstration of exceptional circumstances to justify the release of land from the Green Belt for the use of Gypsy and Traveller and Travelling Showpeople accommodation. |

Outstanding Matters?

4.12.5. There are no outstanding issues between LBH and The Mayor related to this matter at this time.

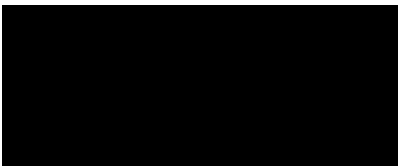
5. Governance Arrangements

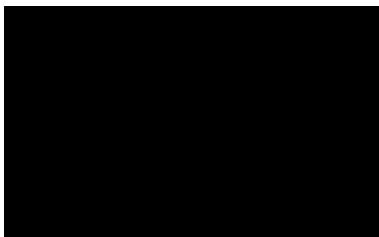
5.1. It is agreed that informal discussions will occur between both parties on the strategic matters referred to in this Statement of Common Ground in the form of officer level meetings at least once every twelve months

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 |  | 06/10/2025 |

| Signed on behalf of The Mayor Of London | | |
|---|---|-------------------|
| Name and position | Signature | Date |
| Lucinda Turner Assistant Director, Planning & Regeneration, Greater London Authority |  | 03/10/2025 |

APPENDIX A: Table of Agreed Modifications that Hounslow will present to the Inspector as part of the Examination

| Section / Policy / Paragraph | Page no. | Rep number (if applicable) | Reason for modification | Agreed modification text (tracked) | Additional comments from the GLA |
|--|----------|----------------------------|---|---|--|
| Figure SS1: Spatial Strategy for Ten Districts | 23 | REP074 | Mapping modification to better clarify OA boundaries within Spatial Strategy for Ten Districts map. | <i>(Mapping modification to be drafted)</i> | Proposed modification agreed |
| Policies Map | N/A | REP074 | To correct errors in map, clarify designation boundaries | <i>(Mapping modification to be drafted)</i> | Proposed modification agreed |
| Policy ED1 - Promoting Employment Growth and Development | 84 | REP074 | In order to ensure that individual sites allocated in the plan will be delivered in a manner that will meet identified needs, and to ensure that permissions resulting from allocations do not unintentionally allow movement to other use classes by way of permitted development rights | [We will expect development proposals to] ... G. When coming forward for employment development on allocated sites, to comply with the minimum development quantum set out in the respective site allocations. <u>The Council will use conditions to ensure that uses within Class E are for the appropriate sub-element of this use class with respect to the particular site, and that any permitted development rights to move to other uses are removed;</u> ... | Proposed modification to policy agreed |
| Fig ED1: Economic Development land in the Borough | 98 | REP074 | Amend chapter map to clearly show new LSIS designations on Green Belt release sites and on existing employment sites. | <i>(Mapping modification to be drafted)</i> | Proposed modification agreed |
| Policy SC1 – Increasing Housing Supply. “Our Approach” | 99 | REP074 | To clarify that an additional 257 homes will also be added to the housing target, in addition to the 1,782 homes per year from 2020-2029, to take account of under-delivery against the target of 1,782 homes during the monitoring year | We will meet and exceed our London Plan derived target of 1,782 homes per annum over the period 2020-2029, delivering more than the 16,038 homes required by 2029 ² . <u>² As well as an additional 257 homes to be delivered by 2029, to account for previous under delivery against the London Plan set target in monitoring year</u> | Proposed modification to policy agreed |

| Section / Policy / Paragraph | Page no. | Rep number (if applicable) | Reason for modification | Agreed modification text (tracked) | Additional comments from the GLA |
|---|----------|----------------------------|---|---|----------------------------------|
| | | | 2019-20. As per representation from the Mayor of London. | 2019-20. Housing supply figures, including completions, from 2019-20 are set out in the Housing Background Paper (2025). | |
| Policy SC1 – Increasing Housing Supply. Paragraph 5.2 | 101 | REP074 | To clarify that an additional 257 homes will also be added to the housing target, in addition to the 1,782 homes per year from 2020-2029, to take account of under-delivery against the target of 1,782 homes during the monitoring year 2019-20. As per representation from the Mayor of London. | 5.2 To deliver the homes needed in the borough, the Council will apply Hounslow’s London Plan derived target of 1,782 homes per annum from 2020 to 2029, which is 16,038 homes ³ . ³ As well as an additional 257 homes to be delivered by 2029, to account for previous under delivery against the London Plan set target in monitoring year 2019-20. | Proposed modification agreed |
| Policy SC1 – Increasing Housing Supply. Paragraph 5.2 | 101 | REP074 | For clarification. To clarify that with 257 homes included to take account of under-delivery against the target of 1,782 homes during the monitoring year 2019-20, the housing target for the plan period 2020 to 2041 is 28,295 homes, rather than 28,040 homes. As per representation from the Mayor of London. | The Local Plan housing target for the plan period 2020 to 2041 is therefore 28,040 28,295 homes. | Proposed modification agreed |
| Policy SC1 – Increasing Housing Supply. Figure SC 2.1 | 103 | REP074 | For clarification, to include 257 additional homes as part of the housing target in 2020/2021 to take account of under-delivery against the target of 1,782 homes during the monitoring year 2019-20. As per representation from the Mayor of London. | Figure SC 2.1: Housing Trajectory 2020 – 2041 to be superseded with an updated version of Figure SC 2.1 that amends the housing target per annum in the column labelled 2020/21 from 1,782 to 2,039, and amends the cumulative housing target in the column labelled 2020/21 from 1,782 to 2,039 and to amend the cumulative housing target for each subsequent monitoring year to reflect that it is 257 homes higher. | Proposed modification agreed |

| Section / Policy / Paragraph | Page no. | Rep number (if applicable) | Reason for modification | Agreed modification text (tracked) | Additional comments from the GLA |
|---|----------|----------------------------|---|---|--|
| Travellers and Travelling Showpeople – Part C | | | target. As per representation from the Mayor of London. | appropriate <u>feasible, intensifying and/or</u> expanding the existing <u>Hartlands sites in the West of the Borough</u> to contribute to meeting the remainder of the borough's 10 year pitch target and supporting their enhancement ; | |
| Policy SC9 - Accommodation for Gypsies, Travellers and Travelling Showpeople – Part D | 126 | REP074 | For clarification, to provide a specific point in time from which Part D of Policy SC9 will apply, which is beyond the 10 year pitch and plot target. As per representation from the Mayor of London. | D. Considering proposals for additional pitches or plots on alternative sites in the medium-long term <u>beyond 2030</u> , where there is an identified unmet need and the use of the site would have no serious adverse impact on the amenity of occupiers of adjoining land, and no serious adverse impact on the visual amenity of the locality; | Proposed modification to policy agreed |
| Policy SC9 - Accommodation for Gypsies, Travellers and Travelling Showpeople - Paragraph 5.38 | 127 | REP074 | For clarification, to explain why a 10 year pitch and plot target is required. As per representation from the Mayor of London. | 5.38 Gypsy and Traveller accommodation is a specialist form of housing suitable for meeting the needs of qualifying people, for which adequate provision should be made to meet evidenced need in accordance with national planning policies and the London Plan. <u>The London Plan requires the Local Plan to include a 10-year target for permanent Gypsy and Traveller pitches and Travelling Showpeople plots, based on a needs assessment.</u> | Proposed modification agreed |
| Policy SC9 - Accommodation for Gypsies, Travellers and Travelling Showpeople - Paragraph 5.40 | 127 | REP074 | For clarification, to explain Hounslow's 10 year pitch and plot target. As per representation from the Mayor of London. | 5.40 The GTTSANA 2019 identifies a need of 33 Gypsy and Traveller pitches, and 26 Travelling Showpeople plots in Hounslow over the plan period 2020 to 2041. This includes 11 existing plots at the Baber Bridge Yard in Feltham that will be protected as a Travelling Showpeople site, which therefore reduces Travelling Showpeople housing needs to 15 plots in the borough. <u>The GTTSANA 2019 informs the borough's 10 year target to deliver 26 Gypsy and Traveller pitches and 12 Travelling Showpeople plots by 2030.</u> | Proposed modification agreed |
| Policy SC9 - Accommodation for Gypsies, | 127 | REP074 | To add further explanation for the approach that will be taken to meet the borough's 10 year pitch and plot | <u>5.42 To contribute to meeting the remaining 6 pitches of the 10 year Gypsy and Traveller pitch target, where feasible, the existing Hartlands Gypsy and</u> | Proposed modification agreed |

| Section / Policy / Paragraph | Page no. | Rep number (if applicable) | Reason for modification | Agreed modification text (tracked) | Additional comments from the GLA |
|---|----------|----------------------------|--|---|--|
| Travellers and Travelling Showpeople - Paragraph 5.42 | | | target. As per representation from the Mayor of London. | Traveller site in the West of the Borough will be intensified and/or expanded. | |
| Chapter 6- Context and Character Policy CC3 Fig CC3.1 | 152 | REP074 | To address points raised by The Mayor in their Regulation 19 representation. | Amendment to the Map at Figure CC3.1 as follows: Extend Lower Scale Tall Building Definition (green mask) to cover all areas of the borough not covered by the higher scale definition. | Proposed modification agreed |
| Chapter 6- Context and Character Policy CC3 Table CC3.2 | 152 | REP074 | Response from the GLA that the plan should use the term 'appropriate heights' as per policy D9 Historic England representation seeking clearer presentation of table. | Amend title for table CC3.2 as follows: Table CC 3.2: Maximum permissible Appropriate heights for each location Amend heading in table CC3.2 as follows: Maximum Appropriate Building Height | Proposed modification agreed |
| Chapter 6- Context and Character Policy CC3 Map CC3.3 | 155 | REP074 | To address points raised by The Mayor in their Regulation 19 representation. | Amend Map at Figure CC3.3 as follows: Map of the full borough with all tall building sites indicated with site boundaries, tall building cluster outlines, focal buildings and local landmarks. Online version to be interactive. Map will also only include the cluster/site codes (removing the height ranges). Appendix to be included with zoomed in versions of the maps (i.e. removing CC3.4-CC3.8 and moving updated versions, as above, to an appendix). | Proposed modification agreed |
| Chapter 6- Context and Character Policy CC4 | 161 | REP074 | Comments from RBGK and LB Richmond that the policy should support early meaningful pre-app engagement by the applicant with appropriate levels of details where there is the potential for the WHS to be impacted. The representations also request that the policy states | D. Working with Royal Botanic Gardens Kew World Heritage Site, London Borough of Richmond and Historic England and the Thames Landscape Strategy to conserve and enhance the outstanding universal values of The Royal Botanical Gardens Kew World Heritage Site, its buffer zone and its setting, including views to and from this asset. This includes assisting in the drafting and implementation | Proposed modification to policy agreed |

| Section / Policy / Paragraph | Page no. | Rep number (if applicable) | Reason for modification | Agreed modification text (tracked) | Additional comments from the GLA |
|---|----------|----------------------------|--|--|--|
| | | | <p>that appropriate weight is given to the provisions in the Management Plan during the decision making process.</p> <p>GLA consider the reference to 'wholly exception circumstances' set out in S11 would be inappropriate and should be removed from the suggested modification wording</p> | <p>of the World Heritage Site Management Plan <u>and its provisions, giving appropriate weight to the provisions of the Management Plan in the decision making process, asking developers to consult and meet with Kew during formulation of their proposals both before and during any pre-application process and following any eventual submission of a proposal for consideration for planning permission, to ensure the OUV of Kew is not harmed.</u></p> | |
| Chapter 6- Context and Character Policy CC4 | 162 | REP074 | To address points raised by The Mayor in their Regulation 19 representation. | M. Demonstrate that substantial harm to <u>the significance of a heritage asset, either individually or cumulatively</u> , or loss of a heritage asset, its significance is avoided in the first instance, and consent will be refused, unless it can be demonstrated that the harm was necessary to achieve substantial public benefits that outweigh the harm. | Proposed modification to policy agreed |
| Chapter 6- Context and Character Policy CC4 | 163 | REP074 | In response to reps from LB Richmond and Historic England that the policy text is aligned with the terminology used in the PPG in relation to WHS and their OUV. Supporting text added to clarify the policy text additions. | <p>W. Conserve, <u>and enhance and safeguard the historic integrity, character and appearance and avoid any further harm to the internationally recognised the</u> Outstanding Universal Value, <u>authenticity and integrity</u> of the Royal Botanic Gardens Kew World Heritage Site, its Buffer Zone and its significance, setting, including views to and from the site. <u>World Heritage sites are of the highest significance and their conservation should be given the greatest weight.</u></p> <p>i) <u>Applications for development proposals that may affect the Outstanding Universal Value of the Kew World Heritage Site should be informed by an</u></p> | Proposed modification to policy agreed |

| Section / Policy / Paragraph | Page no. | Rep number (if applicable) | Reason for modification | Agreed modification text (tracked) | Additional comments from the GLA |
|--|----------|----------------------------|--|--|----------------------------------|
| | | | | <p><u>Historic Impact Assessment Undertaken in line with the Guidance and Toolkit for Impact Assessment in a World Heritage Context or any successor document.</u></p> <p>ii) <u>Appropriate weight will be given to implementing the provisions of the World Heritage Site Management Plan when considering planning applications.</u></p> <p>iii) <u>Applications for development proposals likely to have an impact on the Royal Botanic Gardens Kew World Heritage Site or its Buffer Zone will be required to provide 3D massing models to enable assessment of cumulative impact of development where relevant.</u></p> <p>ii) <u>It is expected that there will be meaningful engagement with the London Borough of Richmond upon Thames and Royal Botanic Gardens Kew early in the process, and with an appropriate amount of detail accompanying an application, where development is likely to impact on the Royal Botanic Gardens Kew World Heritage Site or its buffer.</u></p> <p>(iii) <u>Developers are strongly encouraged to engage in pre-application discussions early in their thinking prior to submitting a planning application likely to impact on the Royal Botanic Gardens Kew World Heritage Site and its Buffer Zone. This process should involve engagement in a planning performance agreement (PPA) that sets a framework for the Council's consideration of a proposal and engagement with an appropriate Design Review Panel.</u></p> | |
| Chapter 6- Context and Character Policy CC4- Supporting Text | 164-165 | REP074 | Comments from RBGK that reference to the ICOMOS guidance on HIAs is added to supporting text. Historic England's representation that the supporting text should be | 6.18 The borough enjoys a network of heritage assets and aspects that defines its origins and illustrates distinctiveness. A heritage asset can be a landscape, place, building, monument or feature that has been identified as having special architectural or | Proposed modification agreed |

| Section / Policy / Paragraph | Page no. | Rep number (if applicable) | Reason for modification | Agreed modification text (tracked) | Additional comments from the GLA |
|------------------------------|----------|----------------------------|---|---|----------------------------------|
| | | | <p>expanded to explain the other designated assets that cover particular aspects of the WHS and an overview of elements of setting that contribute to the OUV of the WHS both within and beyond the buffer zone and what the arcadian Thames is and its relationship to Kew. They state that this would be in line with London Plan Policy HC2.A</p> <p>Historic England's representation should state that the term significance or significance including contribution made by setting should replace other terms such as character, architectural appearance, architectural/ historical/ special interest, value, and sole references to setting (because setting is not separate to significance)</p> <p>Further modification agreed with GLA to add further detail around the relevant WHS attributes and buffer zone.</p> | <p>historic interest. Within the borough, these range from Grade I statutorily Listed Buildings such as Syon House, located with other listed buildings in registered Syon Park and lying within Isleworth Riverside's designated conservation area, to individual or groups of buildings that are locally listed for their contribution to an area's character.</p> <p>6.19 Outside the borough, the Royal Botanic Gardens, Kew World Heritage Site lies in the London Borough of Richmond. Its international importance is set out in the Statement of Outstanding Universal Value. Five attributes that contribute to the Outstanding Universal Value of the Royal Botanic Gardens, Kew WHS are set out in the Kew WHS Management Plan. Of these five, attributes i 'a rich and diverse historic cultural landscape providing a palimpsest of landscape design' and ii 'an iconic architectural legacy' engage the planning process. Policy CC4 (together with the other policies in the plan) are designed to protect Kew Gardens from the visual impact of tall buildings and, to a lesser extent, other impacts such as noise and traffic associated with new development.</p> <p>6.20 Part of the Royal Botanic Gardens, Kew WHS's buffer zone falls within the London Borough of Hounslow. Buffer Zones are identified in the Operational Guidelines for the Implementation of the World Heritage Convention (2017) as an optional measure for protecting the OUV of World Heritage Sites. Not all World Heritage Sites have a Buffer Zone, nor do all sites require them. The buffer zone of the RBG Kew WHS encompasses areas of land with strong historical relationships to the Gardens (the Old Deer Park, Syon Park and Kew Green).</p> | |

| Section / Policy / Paragraph | Page no. | Rep number (if applicable) | Reason for modification | Agreed modification text (tracked) | Additional comments from the GLA |
|------------------------------|----------|----------------------------|-------------------------|---|----------------------------------|
| | | | | <p><u>some locations that are important to the protection of significant views (e.g. Syon Park); and areas that have a bearing on the character and setting of the gardens (the River Thames and its islands between Isleworth Ferry Gate and Kew Bridge; and approaches to the Gardens from the east). These assets, including Royal Botanic Gardens Kew WHS, all form part of the Arcadian Thames Landscape (itself a heritage asset), whose character is further detailed in the Thames Landscape Strategy. Development in and outside this Buffer Zone may threaten the setting and significance of RBGK. Furthermore, the buffer zone does not encompass all of the setting of the WHS and change outside of the buffer zone could affect the setting of the WHS.</u></p> <p>6.21 Syon Park is specifically mentioned as being the focus of one of the garden vistas on the opposite banks of the Thames. Its setting includes, affects and contributes to the borough, including Syon Park. We have a duty to assist in preserving Royal Botanic Gardens Kew's Outstanding Universal Value which includes a rich and diverse historic landscape and an iconic architectural legacy, which in turn provides benefit in <u>significance, including contribution made by setting to</u> views and character to, and recognition of, the assets of the London Borough of Hounslow. <u>The International Council on Monuments and Sites (ICOMOS) method of Heritage Impact Assessment for World Heritage Sites as well as the London Plan and the Mayor of London's SPG on London's World Heritage Sites will be taken into account when assessing proposals. Proposals will be carefully scrutinised for their likely effect on the Royal Botanic Gardens, Kew World Heritage Site or its setting</u></p> | |

| Section / Policy / Paragraph | Page no. | Rep number (if applicable) | Reason for modification | Agreed modification text (tracked) | Additional comments from the GLA |
|---|----------|----------------------------|--|--|----------------------------------|
| | | | | <p>where these occur within the defined buffer zone and wider and more extensive setting of the World Heritage Site, including views to and from the site.</p> <p>6.202 We will expect heritage statements to accompany all proposals affecting heritage assets and Heritage Impact Assessments to accompany all major proposals affecting heritage assets. These should include a description of the significance of any heritage assets, including contribution made by setting, and their settings affected and an analysis of the resultant impact of the development on the significance of the heritage asset and its setting. The level of detail of this material should be proportionate to the significance of the asset affected.</p> | |
| Chapter 6- Context and Character Policy CC4 Notes | 166 | REP074 | Representation seeking correction of the primary source for the statement of OUV and that for clarity the CBA Royal Botanic Gardens Kew World Heritage Site Setting Study (2019) and the UNESCO (2022) Guidance and Toolkit for Impact Assessments in a World Heritage Context are included, along with the APA and Thames Strategies documents and any relevant LBH strategies. | <p>Notes</p> <ul style="list-style-type: none"> The Royal Botanic Gardens Kew has published a range of guidance to inform planning decisions relating to heritage, including the Royal Botanic Gardens Kew World Heritage Site Management Plan (2020-2025) and the Statement of Outstanding Universal Value, CBA Royal Botanic Gardens Kew World Heritage Site Setting Study (2019). The UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022) should be referred to for conducting and reviewing impact assessment for all World Heritage properties. Other relevant documents include the Thames Strategies and documents that are part of the Council's evidence base including Conservation Areas Appraisals, the Great West Corridor Masterplan, the Tall Buildings Study and any Heritage Impact Assessments. | Proposed modification agreed |

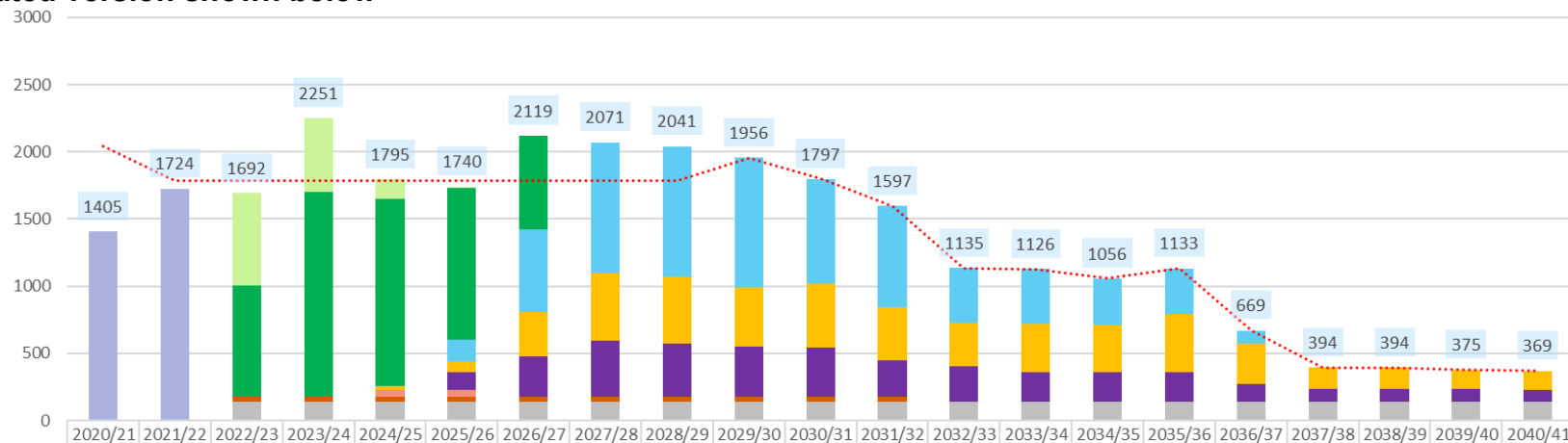
| Section / Policy / Paragraph | Page no. | Rep number (if applicable) | Reason for modification | Agreed modification text (tracked) | Additional comments from the GLA |
|--|----------|----------------------------|--|---|--|
| Chapter 9 – Environmental Quality: Policy EQ7 Sustainable Waste Management | 223 | REP074 | To address points raised by The Mayor in their Regulation 19 representation. | <p>Our approach We will work with the West London Waste Authority boroughs to meet our waste apportionment <u>through measures such as safeguarding waste sites identified within the West London Waste Plan</u>, whilst promoting the prevention, re-use, recycling and recovery of waste, consistent with the waste hierarchy and circular economy principles set out in the London Plan.</p> <p>[...]</p> <p>9.23 London is moving towards waste self-sufficiency, an aim to manage as much of its waste within London as practicable, and sending zero biodegradable and recyclable waste to landfill by 2026. The borough has adopted the West London Waste Plan (WLWP) in partnership with the West London Waste Authority boroughs of Brent, Ealing, Harrow, Hillingdon and Richmond upon Thames. This sets out how the boroughs manage their waste apportionment requirements set out in the London Plan. For Hounslow, this means managing 432,000 tonnes to 2041. The WLWP protects existing waste facilities and identifies sites for waste management in the west London boroughs. <u>London Plan Policy SI 9 ‘Safeguarded waste site’ also requires that existing waste sites should be safeguarded and retained in waste management use.</u> The WLWP will be reviewed and updated to reflect the updated policy requirements and apportionment set out in the London Plan.</p> | Proposed modification to policy agreed |

| Section / Policy / Paragraph | Page no. | Rep number (if applicable) | Reason for modification | Agreed modification text (tracked) | Additional comments from the GLA |
|---|----------|----------------------------|---|--|----------------------------------|
| Chapter 12 - Site Allocations. Allocation ref 3 – Gillette Factory | 262 | REP074 | Wording to be added after the first sentence of the key proposal section for clarification. To provide clarity regarding how the previous Strategic Industrial Location (SIL) designation at the site will change. As per representation from the Mayor of London. | Key Proposal: Gillette Corner will become a major new creative hub drawing on its unique heritage to deliver flexible creative film, digital and media including studios and their supporting uses making the most of the building's large floorplates and attractive features. The site is a mixed use allocation which as a result removes the Strategic Industrial Location (SIL) designation from part of the site which therefore becomes non-designated, as shown on the Hounslow Local Plan 2020-2041 Policies Map. [No further changes to allocation wording] | Proposed modification agreed |
| Chapter 12 - Site Allocations. Allocation ref 5 – West Cross Campus | 266 | REP074 | Wording to be added after the first sentence of the key proposal section for clarification. To provide clarity regarding how the previous Strategic Industrial Location (SIL) designation at the site will change. As per representation from the Mayor of London. | Key Proposal: The West Cross Campus will become a high-quality mixed-use quarter of industrial and other employment uses, in a range of unit sizes, co-located with housing and shared amenities creating a sense of an 'industrial life'. The site is a mixed use allocation which as a result removes the Strategic Industrial Location (SIL) designation from part of the site which therefore becomes non-designated, as shown on the Hounslow Local Plan 2020-2041 Policies Map. It is a major opportunity for transformation and intensification to take forward the Mayor of London's Policy for industrial intensification and co-location with residential uses. [No further changes to allocation wording] | Proposed modification agreed |
| Chapter 12 - Site Allocations. Allocation ref 6 - BSS Brentford | 267 | REP074 | Wording to be added at the start of the Planning designations section to clarify that part of the site is a Strategic Industrial Location (SIL) designation, to set out requirements that will be expected for proposals within SIL and to provide clarity that the area of the site located outside of SIL is suitable for colocation development. As per representation from the Mayor of London. | Planning Designations: Strategic Industrial Location (SIL): Part of the site is designated SIL. Proposals within SIL should, where feasible, intensify uses suitable for broad industrial-type activities and make consideration of impact of development on existing occupiers in accordance with the agent of change principle. Colocation of residential development with industrial development is supported in the allocation outside the boundary of the SIL. Site is also adjacent to SIL and access route; consideration of impact of development on existing | Proposed modification agreed |

| Section / Policy / Paragraph | Page no. | Rep number (if applicable) | Reason for modification | Agreed modification text (tracked) | Additional comments from the GLA |
|---|----------|----------------------------|--|--|----------------------------------|
| | | | | occupiers in accordance with the agent of change principle and regard had to the impact of traffic movements servicing these. | |
| Chapter 12 - Site Allocations. Allocation ref 6 - BSS Brentford | 268 | REP074 | Wording to be added after the first sentence of the key proposal section for clarification. To provide clarity regarding how the previous Strategic Industrial Location (SIL) designation at the site will change. As per representation from the Mayor of London. | Key Proposal: The BSS Brentford Site will be redeveloped and intensified to support a broader range of uses. The site is a mixed use allocation which as a result removes the Strategic Industrial Location (SIL) designation from part of the site which therefore becomes non-designated, as shown on the Hounslow Local Plan 2020-2041 Policies Map. [No further changes to allocation wording] | Proposed modification agreed |
| Chapter 12 - Site Allocations. Allocation ref 7 – Profile West Brentford Car Park | 270 | REP074 | Wording to be added after the first sentence of the key proposal section for clarification. To provide clarity regarding how the previous Strategic Industrial Location (SIL) designation at the site will change. As per representation from the Mayor of London. | Key Proposal: The Profile West Car Park will form a key link between Boston Manor Park and the Golden Mile Station and an attractive entrance to Transport Avenue. The Strategic Industrial Location (SIL) designation is removed from the site, which therefore becomes non-designated, as shown on the Hounslow Local Plan 2020-2041 Policies Map. [No further changes to allocation wording] | Proposed modification agreed |
| Chapter 12 - Site Allocations. Allocation ref 13 – Harlequin Avenue Sub Station | 280 | REP074 | Wording to be added after the first sentence of the key proposal section for clarification. To provide clarity regarding how the previous Strategic Industrial Location (SIL) designation at the site will change. As per representation from the Mayor of London. | Key Proposal: Harlequin Avenue sub-station will be redeveloped to provide a number of residential units with modern and flexible business floorspace which integrates with the surrounding business uses. The Strategic Industrial Location (SIL) designation is removed from the site, which therefore becomes non-designated, as shown on the Hounslow Local Plan 2020-2041 Policies Map. [No further changes to allocation wording] | Proposed modification agreed |
| Chapter 12 - Site Allocations. Allocation ref 49 – Site at Faggs Road | 332 | REP074 | Wording to be added after the first sentence of the key proposal section for clarification. To provide clarity that part of the proposed site allocation is located within the Metropolitan Green Belt and will be released from the Green Belt so | Key Proposal: The site at Faggs Road will be extended to provide additional industrial business space and units to support the borough's future employment needs. The western area of the site which was previously designated part of the Metropolitan Green Belt has been released for employment development and is no longer part of the | Proposed modification agreed |

| Section / Policy / Paragraph | Page no. | Rep number (if applicable) | Reason for modification | Agreed modification text (tracked) | Additional comments from the GLA |
|---|----------|----------------------------|--|---|----------------------------------|
| | | | that the allocation falls entirely outside of the Green Belt designation. As per representation from the Mayor of London. | Green Belt, as shown in Appendix 2 (Land Proposed to be Released from the Green Belt to Meet Development Needs) of the Hounslow Local Plan 2020-2041 and on the Hounslow Local Plan 2020-2041 Policies Map. [No further changes to allocation wording] | |
| Chapter 12 - Site Allocations. Allocation ref 67 – UPS House | 358 | REP074 | For clarification, to include reference to Part C of Policy E7 of the London Plan, in a standalone paragraph as the final sentence of the site requirements section. As per representation from the Mayor of London. | Site Requirements: The site is home to non-designated industrial uses and as such, London Plan Policy E7 (Industrial intensification, co-location and substitution) Part C should be followed. [No further changes to allocation wording following the first sentence in 'site requirements'] | Proposed modification agreed |
| Chapter 12 - Site Allocations. Allocation ref 90 – Inwood Business Park | 394 | REP074 | For clarification, to include reference to Part C of Policy E7 of the London Plan, in a standalone paragraph as the final sentence of the site requirements section. As per representation from the Mayor of London. | Site Requirements: The site is home to non-designated industrial uses and as such, London Plan Policy E7 (Industrial intensification, co-location and substitution) Part C should be followed. [No further changes to allocation wording following the first sentence in 'site requirements'] | Proposed modification agreed |
| Chapter 12 - Site Allocations. Allocation ref 92 – Upstage | 398 | REP074 | For clarification, to include reference to Part C of Policy E7 of the London Plan, in a standalone paragraph as the final sentence of the site requirements section. As per representation from the Mayor of London. | Site Requirements: The site is home to non-designated industrial uses and as such, London Plan Policy E7 (Industrial intensification, co-location and substitution) Part C should be followed. [No further changes to allocation wording following the first sentence in 'site requirements'] | Proposed modification agreed |
| Chapter 12 - Site Allocations. Allocation ref 97 - 30 Rugby Road | 406 | REP074 | For clarification, to include reference to Part C of Policy E7 of the London Plan, in a standalone paragraph as the final sentence of the site requirements section. As per representation from the Mayor of London. | Site Requirements: The site is home to non-designated industrial uses and as such, London Plan Policy E7 (Industrial intensification, co-location and substitution) Part C should be followed. [No further changes to allocation wording following the first sentence in 'site requirements'] | Proposed modification agreed |

APPENDIX B: Proposed Modification to replace Figure SC 2.1: Housing Trajectory 2020 – 2041 with an updated version of Figure SC 2.1. Updated version shown below



| | 2020/21 | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 | 2031/32 | 2032/33 | 2033/34 | 2034/35 | 2035/36 | 2036/37 | 2037/38 | 2038/39 | 2039/40 | 2040/41 |
|---------------------------------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| Net Completions | 1405 | 1724 | | | | | | | | | | | | | | | | | | | |
| Non-Phased Pipeline Schemes | | | 684 | 549 | 144 | 10 | | | | | | | | | | | | | | | |
| Phased Pipeline Schemes | | | 831 | 1525 | 1393 | 1129 | 700 | | | | | | | | | | | | | | |
| Site Allocations Great West Corridor | | | | | | 159 | 612 | 972 | 973 | 964 | 776 | 752 | 405 | 405 | 346 | 344 | 99 | 0 | 0 | 0 | 0 |
| Site Allocations West of Borough | | | | | 28 | 81 | 330 | 502 | 496 | 439 | 479 | 395 | 324 | 365 | 353 | 432 | 296 | 161 | 161 | 142 | 142 |
| Site Allocations Rest of Borough | | | | | | 132 | 300 | 420 | 395 | 376 | 365 | 274 | 264 | 215 | 216 | 216 | 133 | 92 | 92 | 92 | 85 |
| Estate Regeneration sites | | | | | 53 | 53 | | | | | | | | | | | | | | | |
| Other Brownfield Register Small Sites | | | 36 | 36 | 36 | 36 | 36 | 36 | 36 | 36 | 36 | 36 | | | | | | | | | |
| Windfall | | | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 | 141 |
| Target(Per Annum) | 2039 | 1782 | 1782 | 1782 | 1782 | 1782 | 1782 | 1782 | 1782 | 1956 | 1797 | 1597 | 1135 | 1126 | 1056 | 1133 | 669 | 394 | 394 | 375 | 369 |
| Cumulative Target | 2039 | 3821 | 5603 | 7385 | 9167 | 10949 | 12731 | 14513 | 16295 | 18251 | 20047 | 21644 | 22779 | 23905 | 24961 | 26093 | 26762 | 27157 | 27551 | 27926 | 28295 |
| Net Projection | 1405 | 1724 | 1692 | 2251 | 1795 | 1740 | 2119 | 2071 | 2041 | 1956 | 1797 | 1597 | 1135 | 1126 | 1056 | 1133 | 669 | 394 | 394 | 375 | 369 |
| Cumulative Projection | 1405 | 3129 | 4821 | 7072 | 8867 | 10607 | 12726 | 14797 | 16839 | 18795 | 20591 | 22188 | 23323 | 24449 | 25504 | 26637 | 27306 | 27701 | 28095 | 28470 | 28839 |



Appendix C: Explanatory note for GLA re Brentford Town Centre Tall Building site identified in Hounslow Tall Building Study and Local Plan Policy CC3.

Explanatory note for GLA re Brentford Town Centre Tall Building site identified in Hounslow Tall Building Study and Local Plan Policy CC3.

Local Plan Policy CC3 states:

Our approach

To contribute to regeneration and growth, we will support tall buildings of high quality in identified locations which accord with the principles of sustainable development.

B. Supporting a limited number of tall buildings in Brentford town centre. These should be designed carefully and placed sensitively so as not to have a significant adverse impact on the setting of, views from and between heritage assets including Royal Botanic Gardens Kew World Heritage Site, Syon Park and the Thames foreshore landscape. They should also respect and respond to the area’s special townscape and heritage value and protect views across the Thames;

One site is identified as suitable for a tall building, beyond that already permissioned and/or built out:

| | Tall Building (m/ft) | |
|-----------|------------------------|--------------------------------|
| Brentford | | |
| | 2-10 London Road (BR1) | up to 24m/ 7 storeys (31m AOD) |
| Chiswick | | |

With regard to defining the threshold at which a building is considered tall, the Hounslow Tall Building Study says on Page 63:

5.3.5. Some parts of the Borough are more sensitive to tall buildings than others. For instance within Brentford and Chiswick town centres where there are many heritage designations and within the Thames Policy Area. Whilst the building context height in these areas exceeds 15m the Lower Scale 21m tall building definition applies.

This does not explicitly state consideration of OUV of RBGK, but it does state consideration of all heritage considerations, including the OUV of Kew Gardens.

In each area, the Tall Buildings Study considers the impacts on townscape, heritage and views. Regarding Brentford, the Tall Building Study states, on Page 79:

7.1.4. The London Borough of Hounslow have prepared masterplans for some of the Areas of Search (Feltham, Hounslow and Brentford town centres) and these plans make recommendations on the potential for tall buildings in these centres. This is used as the starting point for the evaluation of the potential for tall buildings however testing of the impacts on the existing townscape was not carried out as part of these studies.

7.1.5. For these areas simple massing models have been prepared in order to test the visual impact of tall buildings on their context. The proposals have been modelled into the VuCity model and tested in a range of representative views. These include on the main approaches into the centres, views across open spaces and views in which heritage assets or other townscape features, that may be sensitive to, or impacted by tall buildings are located.

In respect of the Brentford tall building area search, Pages 211, 214 and 216 of the Tall Building Study state:



Figure 7.232: Brentford High Street Area of Search - heritage assets

HERITAGE ASSETS

7.8.6. The Area of Search includes parts of three Conservation Areas; the Grand Union Canal and Boston Manor CA, Butts CA and St. Paul’s Brentford CA. Syon Park, to the immediate south-west, is part of the Isleworth Riverside CA and also a Grade I Registered Park and Garden.

7.8.7. The Conservation Areas include numerous listed and locally listed buildings including the Grade II* former St. Lawrence Church on the High Street, the locally listed St. Paul’s Church on St. Paul’s Road and the locally listed former Magistrates Court on Market Square.

7.8.8. The Royal Botanic Gardens Kew WHS is located across the River Thames and its buffer includes Syon Park and the river corridor but not the Area of Search. The Area of Search is an Archaeological Priority Area.

LONDON BOROUGH OF HOUNSLOW
TALL BUILDING STUDY

-  Borough Boundary
-  World Heritage Site
-  World Heritage Site Buffer
-  Conservation Areas
-  Areas of Special Character
-  Registered Parks and Gardens
-  Archeological Priority Areas
-  Scheduled Ancient Monuments
- Listed Building
 -  Grade I
 -  Grade II*
 -  Grade II
 -  Locally Listed Building



Figure 7.239: Brentford High Street Area of Search - inappropriate areas overlay

INAPPROPRIATE AREAS

7.8.19. There are many sensitivities to tall buildings within the wider context of the Area of Search including heritage assets (Conservation Area and Registered Park and Garden designations and the WHS buffer zone), lower scale residential areas and open spaces. Three Conservation Area extends into the Area of Search. Sensitivities are overlaid in Figure 7.239 above.

-  Borough Boundary
-  Conservation Areas
-  Areas of Special Character
-  World Heritage Site
-  World Heritage Site Buffer
-  Conserve Areas (Identified in Character Study)
-  Metropolitan Green Belt
-  Metropolitan Open Land
-  Local Nature Reserves
-  Local Open Space
-  Low Scale Residential Areas (Context Height Below 10m)



Figure 7.242: Brentford High Street Area of Search - Areas with potential for tall buildings

POTENTIAL LOCATIONS FOR TALL BUILDINGS

7.8.22. Subtracting the inappropriate areas (identified in Figure 7.239) from the composite plan supporting the potential for tall buildings (identified in Figure 7.241) gives rise to a potential for tall buildings within the Area of Search.



This shows clear consideration of OUV. The next step was to consider views. Seventeen representative views have been considered for Brentford in the Tall Building Study. Views from Kew Gardens were considered, but VuCity modelling showed that the tall building in Brentford (2-10 London Road- BR1) is not visible from any of the locations identified in the Royal Botanic Gardens Kew WHS Management Plan. Brentford Views 1 and 2 test the impacts on views from Kew Bridge and the Thames Path.

A number of consented proposals on or south of Brentford High Street are visible in View 2. The most prominent is the 39.4m high (eleven storey) building proposed at 69-76 High Street 'Montgomery's Wharf'. Replacement of the tall former Brentford Police Station with a more modest scale 20m high six storey development (Site B2) removes this tall building from the skyline.

The approach taken to the OUV of RBGK throughout the Local Plan documents is one that aims to fully respect the big open sky 'otherworldliness' of Kew. This is the attribute that has the potential to be impacted by tall buildings on the Hounslow side of the river, including in Brentford.

Due to the potential to impact on the OUV of RBK WHS as a result of tall building development in the Great West Corridor, the approach to OUV is explained more clearly in the Great West Corridor Masterplan (Pages 130-164 and Appendices A and B) and Views Appendix. However, the methodology and principles used in the GWC Masterplan have informed the consideration of the proposed Brentford Town Centre tall buildings- they are written by the same consultants Urban Initiatives <https://www.urbaninitiatives.co.uk/news/hounslow-launches-consultation-on-new-local-plan/>

Their work leads to the conclusion that there is only one new site (beyond those permitted already and those built out, which have been subject to the same assessment, although material considerations re. planning benefits may have played a role in planning decisions) that is considered suitable for a tall building- 2-10 London Road, referred to as BR1 in Policy CC3.

To explain further the Council has a very clear understanding the OUV of Kew Gardens:

The following five Attributes for the Royal Botanic Gardens, Kew WHS have been defined in their Management Plan. These were identified in the 2014 Management Plan for the property and have been defined for the current Management Plan.

- i a rich and diverse historic cultural landscape providing a palimpsest of landscape design;
- ii an iconic architectural legacy;
- iii globally important preserved and living plant collections;
- iv a horticultural heritage of keynote species and collections;
- v key contributions to developments in plant science and plant taxonomy.

It is only attributes i and ii that engage the planning process and these are the driving principles for Hounslow when considering the location of tall buildings in Brentford. The policies are designed to protect Kew Gardens from the visual impact of tall buildings, and, to a lesser extent, the less visual impacts which are the noise and traffic potentially associated with these developments.

i a rich and diverse historic cultural landscape providing a palimpsest of landscape design;

Kew Gardens is a multi-phase historic designed landscape. Every phase of development has been accompanied by seminal landscape design by internationally renowned landscape architects, illustrating significant periods in garden design from the 18th to the 20th centuries.

Key surviving physical features of the property's historic cultural landscape include:

- i The Victorian garden lay-out designed as a collaboration between Sir William Hooker, William Nesfield and Decimus Burton, with its set-pieces around iconic buildings, and vistas and promenades stretching across the landscape;
- ii Remaining aspects of William Chambers 'Anglo-Chinese' garden style, particularly the Great Pagoda;
- iii Remaining aspects of 'Capability' Brown's landscape design including plantations, landform (including Rhododendron Dell) and the ha-ha connection to the Thames and Syon Park beyond;
- iv Strongly enclosed sense of 'otherworldliness' within the high walls and tree shelterbelts;
- v Its relationship with the River Thames, and in particular with surviving elements of the Arcadian landscapes of the Thames;
- vi Ability for visitors to roam freely across the landscape to encounter set key views and to develop personalised experiences of the gardens, landscape features and iconic buildings contained within;
- vii Archaeological remains of all phases of the gardens, including former Charles Bridgeman and William Kent landscape structures;
- viii Key heritage trees and plants that survive from each phase of design, and which tell particular stories, such as the wisteria that once adorned the 18th century Great Stove.

As can be seen above, the Council's policy seeks to largely prevent this 'otherworldliness' being interrupted by tall buildings (excluding extant permissions, which predate World Heritage Site designation) appearing above the treeline in Kew, principally in its' setting and buffer zone. This does not prevent the Council and other decision-makers making a decision where harm arises and is outweighed by public benefits. However, the policy remains clear that Kew Gardens is a World Heritage Site (the highest classification of heritage asset) whose significance and OUV is such that tall buildings can be harmful if visible in its' setting and such harm should be avoided or wholly exceptional.

Intrinsically linked to Attribute 1 is **Attribute 2: An iconic architectural legacy**. The architecture which is in the designed landscapes form part of those landscapes and is affected in the same way as the natural elements of those landscapes. The Council's policy therefore follows the same ethos.