



Integrated Impact Assessment (IIA) for the new Hounslow Local Plan

IIA Scoping Paper

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1. Introduction

Background

- 1.1 The London Borough of Hounslow (LBH) is currently preparing a new Local Plan for the borough.
- 1.2 The existing Hounslow Local Plan was adopted by LBH in September 2015. In response to the recommendations of the Planning Inspector who examined the plan, the Council made a commitment through policies SV1 and SV2 to undertake a Local Plan Review focusing on two key areas of the borough, the Great West Corridor and the West of Borough, in order to further unlock growth in the borough.
- 1.3 In November 2020, the Council approved the Volume 2: Site Allocations and Volume 3: West of Borough Plans, Volume 4: Great West Corridor development plan documents for examination by independent Inspectors. The first stage of examination hearings was held in November 2021, and a month later the Inspectors issued their “Post Hearings Letter” (December 2021). In their letter, the Inspectors instructed the Council to seek the advice of a separate Planning Inspector at PINS regarding how the Council could progress with implementing a limited number of changes to the Volume 1 Local Plan (2015), a proposal described by officers as a ‘Focussed Review’ of Volume 1. This was considered necessary to ensure that Volume 1 was in general conformity with the recently published London Plan (2021), was consistent with any relevant changes to national policy and guidance, and appropriately aligned with the emerging Volumes 2, 3 and 4 of the Local Plan.
- 1.4 The independent PINS Inspector advised that the Council would need to take any proposed amendments to the Volume 1 Local Plan (however minor) through a Local Plan examination process. In order to begin this process, Hounslow conducted a ‘Regulation 18’ consultation on the focussed changes to the Volume 1 Local Plan in October-November 2022. However, the Inspectors examining the Local Plan Review Vol. 2, 3 & 4 subsequently raised procedural and potential soundness issues with progressing the examination of Volumes 2, 3 and 4 before examining and adopting the Focussed Review of Volume 1.
- 1.5 Having reviewed the options available, the Council decided to withdraw the volumes currently at examination before progressing the Local Plan Review as a consolidated document that combines the four volumes of the emerging Plan into a single Local Plan document, incorporating a limited number of necessary amendments, for review. To this end, Hounslow Council formally agreed to withdraw Volumes 2, 3 and 4 of the Local Plan from Examination on 11th July 2023.
- 1.6 On 5th September 2023, the Council agreed to the commencement of a focused consultation (Regulation 18) on the Council’s approach to consolidating the Local Plan Review documents into a single Local Plan, with limited changes and updates. The Regulation 18 consultation will be focused on the Council’s proposal to consolidate the emerging development plan documents (DPDs), consisting of the Volumes 2, 3 and 4 together with the focused review of Volume 1, into a new single emerging Local Plan, with necessary updates and changes to reflect the passage of time (hereafter referred to as the ‘new Local Plan’), as well as providing a brief summary of some of the changes to be made to the content of the Plan.
- 1.7 This IIA Scoping Paper accompanies the focused consultation.

Purpose of this Scoping Paper

Integrated Impact Assessment for the new Hounslow Local Plan

- 1.8 To accompany the development of the now withdrawn Local Plan Volumes 2, 3 & 4, an Integrated Impact Assessment (IIA) was undertaken. IIA fulfils the requirements for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)¹ and discharges the duties for Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA).
- 1.9 IIA is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of IIA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts. Through this approach, the IIA for the Volumes 2-4 sought to maximise the developing plan's contribution to sustainable development and the quality of life of residents.
- 1.10 To mirror the approach undertaken previously, the development of the new Local Plan will also be accompanied by an IIA process. Given the significant overlaps between the work contained in Volumes 2, 3 & 4 and the new Local Plan, much of the previous IIA work undertaken for Volumes 2, 3 & 4 will inform plan development. However, in light of the decision to prepare a consolidated version of the Local Plan, LBH have viewed it appropriate to revisit the scope for the IIA.

Revisiting scoping for the IIA

- 1.11 The SEA Regulations require that: *“When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”*. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.
- 1.12 These authorities were consulted on the scope of the IIA in July 2016, when LBH consulted on a Scoping Report for the Local Plan Review.
- 1.13 The Scoping Report set out a review of the sustainability context and baseline for the IIA. Drawing on this review, it subsequently identified a range of sustainability problems / issues that should be a particular focus of IIA, ensuring it remains targeted at the most important sustainability issues. These issues were then translated into an IIA ‘framework’ of objectives and appraisal questions. The IIA Framework provides a way in which the sustainability effects of the Local Plan and alternatives can be identified and analysed based on a structured and consistent approach.
- 1.14 Given the timeframe which has elapsed between the release of the Scoping Report for the Local Plan and the current IIA process, LBH have viewed it appropriate to revisit the scope for the IIA. In light of this, the evidence base for the IIA has been reviewed, with a focus on the key changes to the policy context and baseline which have taken place in the interim. This has been undertaken in conjunction with the identification of an updated set of key sustainability issues for the borough.

¹ IIA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)

Structure of this Scoping Paper

1.15 The Scoping Paper has been presented as follows:

- **Chapter 2** presents a review of the key policies, plans and programmes that have been introduced since scoping was initially carried out for the IIA of the Local Plan Review of Volumes 2, 3 & 4.
- **Chapter 3** considers the key changes to the baseline that have taken place since scoping was initially carried out.
- **Chapter 4** presents the updated IIA Framework of objectives and appraisal questions against which the new Local Plan will be assessed. These objectives and appraisal questions are presented in conjunction with the key sustainability issues identified for the borough.
- **Chapter 5** sets out the next steps for plan making and the accompanying IIA process.

2. Review of key recent plans, policies and programmes

- 2.1 The IIA should consider the relationships between the Local Plan and other relevant policies, plans and programmes (PPPs) and associated environmental objectives. In this context, the contents of the Local Plan will be partially influenced by, and will also have some influence over, objectives presented within other PPPs that are produced.
- 2.2 The 2016 Scoping Report presented an overview of the relevant PPPs that are likely to influence the Local Plan. However, in the period since, a range of new PPPs have been introduced and adopted.
- 2.3 Where appropriate, the objectives of these more recently introduced PPPs should be reflected by the scope of the IIA process. In light of this, the following summary presents an overview of the key national, regional (i.e. London) and local PPPs which have been introduced in these intervening years.

National PPPs

- 2.4 The [National Planning Policy Framework \(NPPF\)](#), the latest version of which was published on 5th September 2023, sets out the government's planning policies for England and how these are expected to be applied. It is the key document that must be considered when preparing development plans, and is a material consideration in planning decisions. The NPPF is supported by [Planning Practice Guidance \(PPG\)](#), which is a suite of policy papers covering a broad range of topics. This includes the [National Model Design Code](#), published in July 2021, sets out clear design parameters to help local authorities and communities decide what good quality design looks like in their area. It also includes the [National Design Guide](#) (published in 2021), which sets out the characteristics of well-designed places, and demonstrates what good design means in practice, and how beautiful, healthy, greener, enduring and successful places can be achieved.
- 2.5 The [UK Climate Change Risk Assessment 2022](#) is the third five-year assessment of the risks climate change poses to the UK, as required by the Climate Change Act (2008). It identifies 61 climate risks that will impact upon multiple areas of society, and identifies eight priority risk areas for action. These include (but are not limited to) risks to soil health, risks to human health, wellbeing and productivity, and risks to the viability and diversity of habitats and species.
- 2.6 The [Net Zero Strategy: Build Back Greener](#), published in October 2021, sets out policies and proposals for decarbonising all sectors of the UK economy in order to meet the net zero by 2050 target. It outlines four key principles that will contribute to this target: working with the grain of consumer choice, ensuring the biggest polluters pay the most, protecting the most vulnerable, and deliver deep cost reductions in low carbon technology.
- 2.7 [Decarbonising Transport: A Better, Greener Britain](#) (published July 2021) sets out the government's commitments to decarbonise the entire transport system in the UK, and actions needed to achieve this. This includes an outline of the pathway to net zero transport in the UK, the wider benefits net zero transport can deliver, and the principles that underpin the approach to delivering net zero transport. The [Decarbonising Transport: One Year On](#) (published July 2022) summarises what has been achieved to reduce emissions from transport, and the next steps the government will take to support further decarbonisation of the sector.

- 2.8 The [Waste Management Plan for England](#), published in January 2021, is an analysis of the current waste management situation in the country, with the aim of bringing current waste management policies together under one national plan.
- 2.9 The [Environment Act 2021](#) seeks to halt the decline of species by 2030, clean up the air and protect the health of rivers in the UK, as well as reform the way in which waste is dealt with and resources are used. It also seeks to tackle deforestation overseas, and will require new development to improve or create habitats as part of the design.
- 2.10 The [National Infrastructure Strategy](#), published in November 2020, sets out the government's plans to deliver an improvement to the UK's infrastructure to help level up the country and support the journey to net zero emissions by 2050.
- 2.11 [Health Equity in England: The Marmot Review 10 Years On](#) was published in February 2020. The report highlights that people can expect to spend more of their lives in poor health, that improvements to life expectancy have stalled (and declined for women in the 10% most deprived areas), the health gap between healthy and deprived areas has grown, and that place does have an impact on health.
- 2.12 [Future of Mobility: Urban Strategy](#), published in March 2019, outlines the government's approach to urban transportation – especially for urban mobility linked to freight movements, passengers and services. It seeks to maximise the benefits from transportation innovation in more urban areas, and sets out principles that will guide the government's response to emerging technologies and business models.
- 2.13 The [Clean Air Strategy 2019](#) sets out the governmental plans for dealing with all sources of air pollution to improve the health and quality of air. It also seeks the protection of nature and the boosting of the economy. The strategy sets out comprehensive actions required for the government and society to improve air quality across the country.
- 2.14 [A Green Future: Our 25 Year Plan to Improve the Environment](#), adopted in 2018, places importance on improvements to the natural environment, such as achieving clean air and water, reducing environmental hazard risk, and encouraging sustainable resource use. This will be accomplished through a variety of actions including implementing sustainable land management, engaging in nature recovery, and connecting people to the environment. The [Environmental Improvement Plan 2023](#) is the first revision of the 25 Year Environment Plan. It sets out a new plan on how the government will work with landowners, communities and businesses to deliver the ten goals for improving the environment, matched with interim targets to measure progress.
- 2.15 [Healthy High Streets: good place making in an urban setting](#), published in 2018, is a key source of evidence for the implementation of inclusive, safe and healthy high streets – especially in more deprived areas. It highlights the importance of understanding how people and places interact in order to fully realise the potential of high streets.
- 2.16 The [National Infrastructure Assessment](#) is published every five years (the last published in 2018), and analyses the UK's long term economic infrastructure needs – outlining a strategic vision over the next 30 years and setting out recommendations for how identified needs should be met. The first assessment includes recommendations on digital connectivity, low carbon energy, drought and flood risk management, towns and urban transport, design, and funding.
- 2.17 [The Conservation of Habitats and Species Regulations 2017](#) translates the EEC Council Directive 92/43/EEC (Habitats Directive) into UK legislation. It protects habitats and species, specifically European Protected Species (EPS). The [Changes to the Habitats Regulations 2017 Policy Paper](#), published in 2021, explains changes that

have been made to these regulations, specifically around transferring functions from the European Commission to the most appropriate authorities in England and Wales.

- 2.18 [The Clean Growth Strategy: Leading the way to a low carbon future](#), published in October 2017, sets out a comprehensive set of policies and proposals that aim to accelerate the pace of clean growth. It sets two guiding objectives for reducing emissions, and recognises the need to nurture low carbon technologies, processes and systems that are as low cost as possible.
- 2.19 The [UK plan for tackling roadside nitrogen dioxide concentrations: An overview](#) was published in July 2017. It outlines the government's ambition for a better environment and cleaner air, and the actions it will take to achieve this. This includes investment into the cycling and walking network, green buses and the national road network.
- 2.20 The [Space for people: Targeting action for woodland access](#) policy paper, published May 2017, provides analysis on access levels of people in the UK to woodland areas close to their homes. Access to woodlands provides benefits to physical and mental health and wellbeing – as such, the policy paper is a useful resource for policy makers, health professionals, and planners. The policy paper also highlights the Woodland Trust's vision for increasing access to woodland areas.
- 2.21 Historic England champions England's heritage. The key high-level principles for the conservation and enhancement of the historic environment are as follows:
- The historic environment is a shared resource.
 - Everyone should be able to participate in sustaining the historic environment.
 - Understanding the significance of places is vital.
 - Significant places should be managed to sustain their values.
 - Decisions about change must be reasonable, transparent, and consistent; and
 - Documenting and learning from decisions are essential.

The key strategies contributing to these principles are:

- [Heritage and Climate Change: A strategy for Historic England's response to the climate, energy and biodiversity crisis](#) (published 23rd March 2022).
- [Statements of Heritage Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12](#) (published October 2019).
- [Conservation Area Appraisal, Designation and Management Historic England Advice Note 1 \(Second Edition\)](#) (published February 2019); and
- [The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 \(Second Edition\)](#) (published December 2017).

Regional (London) PPPs

- 2.22 The [London Plan 2021](#) is the latest version of the Spatial Development Strategy for the Greater London Authority. It forms a key part of the individual development plans for each local planning authority in London. The London Plan sets out an integrated framework for economic, environmental, transport and social development for the next 20 to 25 years (from 2019 until 2041). It also ensures a consistent approach is taken across London when it comes to implementing strategies, including those linked to health and health inequalities, economic development and housing. The London Plan is supported by [London Plan Guidance \(LPG\)](#) documents, which provide further information on how the current London Plan should be implemented. This also includes Supplementary Planning Guidance (SPG) documents from earlier London

Plans that have been saved and carried forward into this planning period. These LPG and SPG documents cover a variety of themes, including (but not limited to) economy, transport, and green infrastructure and natural environment.

- 2.23 The [draft Thames Water Water Resources Management Plan 2024 \(WRMP24\)](#) is an emerging strategic plan. Once adopted, it will set out how Thames Water (the company responsible for managing water resources and wastewater for London) will achieve a secure supply of water for consumers, and will also outline how the company will protect and enhance the environment. The plan forecasts that an additional one billion litres of water every day will be needed for customers by 2075, linked to climate change and a growing population.
- 2.24 [An Economic Framework for London](#) was adopted in December 2022, and is a refresh of a document published in November 2021. It identifies gaps in London's activity and encourages collaboration to tackle identified challenges across five key areas (known as pillars): jobs, businesses, thriving neighbourhoods, connected city, and global London. Each pillar includes four key issues to focus collective efforts; however, there are two cross-cutting priorities across the five pillars: achieving net-zero and building the green economy, and narrowing social, economic and health inequalities. The framework also identifies key opportunities for central government to support recovery activities and levelling up.
- 2.25 [London's Police and Crime Plan 2022-25](#), adopted in March 2022, is the Mayor's plan for policing and keeping Londoners safe. This will contribute to making the city safer for everyone. To deliver improvements that make the city feel safer, the Police and Crime Plan sets out four key themes: reducing and preventing violence, increasing trust and confidence, better supporting victims, and protecting people from being exploited or harmed.
- 2.26 Whole life-cycle carbon emissions are the carbon emissions resulting from the materials, construction phase and use of a building over its entire life. This includes its demolition and disposals. Under the London Plan there is a requirement for development proposals to calculate and reduce whole life-cycle carbon emissions (Policy SI 2). [Whole Life-Cycle Carbon Assessments - London Plan Guidance](#) was published in March 2022, and provides guidance on how to prepare a whole life-cycle carbon assessment, and how and when to submit it.
- 2.27 The [London City Resilience Strategy](#), adopted in February 2020, aims to ensure London is able to remain resilient and prepared for future challenges. It highlights the long-term resilience challenges facing the city up to 2050, which includes (but is not limited to) climate change, urbanisation, social inequalities, and risks associated with economic integration. It also outlines actions to build the city's resilience, which are grouped into actions linked to people (e.g., food security), place (e.g., resilient and zero carbon infrastructure) and process (e.g., preparing for a cashless society).
- 2.28 The [Culture for all Londoners: Mayor of London's Culture Strategy](#), adopted December 2018, recognises that culture in the city is varied and wide-reaching. The strategy introduces an ambitious vision and priorities that will contribute to safeguarding and enhancing London's existing culture. It also works to make culture in London more accessible for residents and visitors alike, and sets out how cultural opportunities will be taken advantage of across London.
- 2.29 [Sport for all of us: The Mayor's strategy for sport and physical activity](#), adopted in December 2018, examines the current state of sport in the capital to identify how successes can be built upon, and future opportunities made the most of. In this strategy the Mayor commits to using sport to tackle problems in the city, enhance community connectivity, and improve the lives of Londoners.

- 2.30 [The London Health Inequalities Strategy](#), adopted September 2018, sets out the Mayor's plans to tackle unfair differences in health across the city to make London a healthier and fairer city. Five key aims have been identified to tackle inequalities over the next ten years – these focus on children, mental health, creating healthier places (linked to the environment and economy), supporting communities and diversity, and promoting healthier choices. The [Health Inequalities Strategy Implementation Plan 2021-24](#) outlines the priority actions that the Mayor has committed to taking forward to help execute the London Health Inequalities Strategy for the stated time period.
- 2.31 [Inclusive London: The Mayor's Equality, Diversity and Inclusion Strategy](#), adopted May 2018, sets out how work will be undertaken to create a fairer, more equal and integrated city where all people feel welcome. It is made up of 39 individual objectives that span six key strategy areas. This includes (but is not limited to) focuses on young people, work and business, and accessibility.
- 2.32 [London Environment Strategy](#), adopted May 2018, sets out the ambition to make London the greenest global city in the world. This ambition focuses on making the city greener, cleaner, and ready for the future. The strategy focuses on seven key areas, each of which contribute to the functioning and improvement of life in London in important ways. These seven areas are: air quality, green infrastructure, climate mitigation and energy, waste, adapting to climate change, ambient noise, and low carbon circular economy. By addressing these seven areas, the strategy will help to create a better environment for London and help the city work better for everyone.
- 2.33 The [London Housing Strategy](#) was adopted in May 2018. It provides detail on the Mayor's plans to tackle the housing crisis in London, and his vision to provide all residents of London with a good quality home they can afford. Five priorities are included in the strategy which will help fight housing issues in the city: building homes for Londoners, delivering genuinely affordable homes, high quality homes and inclusive neighbourhoods, a fairer deal for private renters and leaseholders, and tackling homelessness and helping rough sleepers. The strategy looks to ensure all parts of the city host their fair share of new homes.
- 2.34 The [Mayor's Transport Strategy](#) was adopted in March 2018, and sets out the policies and proposals that will help reshape transportation in London. The strategy sets out three key themes that will inspire changes to the city's transport infrastructure: healthy streets and healthy people, a good public transport experience, and new homes and jobs. These themes are inspired by the [Healthy Streets for London](#) approach, adopted in 2017, which prioritises human health and experience in London, and inspires residents and visitors to walk, cycle and use public transport more. The [Addendum to the Mayor's Transport Strategy \(MTS\): Proposal 24.1](#) was made in 2022 following consultation with Transport for London (TfL) – adding further information in relation to air pollution, the climate emergency, and traffic congestion. This addendum has contributed to the expansion of the Ultra Low Emission Zone across London.
- 2.35 [Culture and the night-time economy SPG](#), adopted November 2017, offers guidance and case studies to inform the protection and enhancement of culture and the night-time economy in the city. This includes making culture and the night-time economy more inclusive and accessible, and promoting increased engagement whilst achieving a balance with the needs of local residents.
- 2.36 [Homes for Londoners: Affordable housing and viability SPG](#) focuses on affordable housing and viability. It also provides additional information in relation to the London Plan 2021. Local planning authorities are strongly encouraged to follow the approach outlined in this document for all schemes providing a minimum of ten new homes.

Local PPPs

- 2.37 [Delivering Net Zero: An evidence study to support planning policies which deliver Net Zero Carbon developments](#), published May 2023, provides an evidence base in relation to the delivery of net zero carbon development. The study considers two main indicative policy options that could be adopted by LBH, which would help ensure the delivery of net zero development in conformity with the London Plan.
- 2.38 [Ambitious for Hounslow](#) is the borough's key corporate plan for 2022-2026, setting out the Council's vision for the borough and how this will be funded and delivered. It focuses on six priority ambitions which would help create a better Hounslow – a greener, healthier, cleaner, thriving, safer and liveable borough. The Council outlines indicators that will be tracked to demonstrate whether these ambitions are being met, and actions that will be undertaken to contribute to the sustainability of the borough.
- 2.39 The [Recycling and Refuse guidance](#) was updated in August 2022. It provides guidance regarding collection, storage capacity requirements, storage areas, and vehicle access for applicants when preparing planning applications.
- 2.40 [Hounslow: Prosperity and Place](#) was approved by LBH Cabinet on 11th January 2022, and provides a framework for regeneration and growth in the borough. It sets out the council's approach and ambitions for building on the strong pre-covid economic baseline. The four core objectives connect with and build upon the green economy and growth plans, and grow the existing inclusive and enabled communities approach the council already takes.
- 2.41 The [Housing Delivery Plan 2022-2026](#) sets out how Hounslow Borough Council intends to deliver 1,000 new council homes and purchase 1,000 new council homes by May 2026. This will help residents in the borough face the housing crisis that is felt across London.
- 2.42 The [Local Flood Risk Management Strategy](#) for Hounslow outlines how the local authority and other stakeholders will manage local flood risk in the borough from 2022 to 2028. It sets out four local strategic objectives and an action plan to ensure flood risk is managed in a way that delivers the greatest benefit to the residents, businesses and environment in the borough.
- 2.43 The [London Borough of Hounslow Green and Blue Infrastructure Strategy](#) was adopted in October 2021. It aims to support a green recovery in the borough by providing a vision and framework for green and blue infrastructure (GBI), and establishes GBI as of equal importance to 'grey' infrastructure and the built environment. The key aims of the strategy includes:
- Identify and provide an assessment of the green and blue infrastructure network.
 - Set out key drivers and 'needs' for GBI in the borough.
 - Identify areas of deficiency in terms of quality, value and accessibility.
 - Identify priority areas and areas of opportunity. To include improvements to existing GBI and new GBI; and
 - Set out mechanisms for delivery. To include priority projects, actions and partnership working.
- 2.44 This is supported by the [Hounslow Nature Recovery Action Plan \(NRAP\)](#) which was approved by Cabinet in July 2023.
- 2.45 The [Surface Water Management Plan \(SWMP\)](#) was written in 2021, and outlines the preferred methodology for managing the risk of flooding in the borough linked to local

- sources. This includes sewer flooding, groundwater flooding, and surface water flooding. The SWMP identifies 15 hotspots in the borough that have a 'high' flood risk rating – and indicates these areas should be the priority for investigation by Hounslow Borough Council.
- 2.46 [Hounslow's Allotments Strategy 2020-2025](#) indicates allotments are a vital component of the Corporate Plan as they contribute to green infrastructure. They also contribute to the cultural development of the borough, and improve the quality of life for local communities. The plan presents a number of actions on the short, medium and long term actions scales that will help ensure the status of allotments are maintained and enhanced.
- 2.47 Following the declaration of a climate emergency in June 2019, Hounslow Borough Council adopted the [Climate Emergency Action Plan 2020-2030](#) on 14th July 2020. Seven programmes have been developed to enable Hounslow Borough Council to reduce council direct carbon emissions and achieve the net zero target by 2030. In addition to these seven programmes, the Climate Emergency Action Plan 2020-2030 highlights six programmes that Hounslow Borough Council will work towards with its strategic partners, businesses and communities to further reduce emissions in the borough. The [Climate Emergency Action Plan Annual Report 2023](#) sets out progress made by Hounslow Borough Council to reduce carbon emissions in the borough.
- 2.48 The [Hounslow Transport Strategy - Third Local Implementation Plan](#) was adopted in February 2019 and describes how Hounslow Borough Council will implement the policies and proposals included in Mayor's Transport Strategy (MTS) on the local level. This is both independently and alongside Transport for London (TfL). It also outlines how the borough will contribute to other local and sub-regional goals.
- 2.49 The [Thriving Communities Strategy 2019-2023](#) is the latest programme setting out how Hounslow Borough Council will work to deliver positive and lasting benefits for communities across the borough. It includes four key outcomes which guides how the council connects communities and the voluntary and community sector with appropriate resources in order to respond to the needs of everyone that lives and / or works in Hounslow.
- 2.50 The [London Borough of Hounslow: Air Quality Action Plan 2018-2023](#) was adopted on 27th September 2018, and outlines actions the council will take to improve air quality in the borough. The actions fall broadly under seven topics, including cleaner transport, public health and awareness raising, and emissions from developments and buildings. The consultation on the [draft Hounslow Air Quality Action Plan 2023-2028](#) closed on the 4th October 2023; it is anticipated the Air Quality Action Plan 2023-2028 will be adopted later in 2023.
- 2.51 The [Future Borough Strategy 2018-2035](#), published in June 2018, is the community strategy for Hounslow. It outlines a long-term vision, and presents the key challenges the borough will face whilst working to achieve this vision. It also develops priorities to help the borough overcome these challenges. The vision is "the borough of Hounslow will be a destination where people choose to live, remain, work, play and visit. It will remain a borough made up of distinct and prosperous places, each retaining its own unique character, function and history. Our communities and the individuals within will be safe, healthy, happy, connected and able to achieve their ambitions by being in the borough".
- 2.52 The [West London Strategic Flood Risk Assessment \(SFRA\)](#) was adopted in March 2018, and was commissioned by the West London Boroughs of Barnet, Brent, Ealing, Harrow, Hillingdon and Hounslow. It is a Level 1 SFRA, and provides evidence to ensure development is steered away from those areas identified most at risk from various flood sources.

- 2.53 The [Feltham MOD Planning Brief SPD](#) was adopted on 8th August 2017. It sets out planning guidance for landowners and prospective developers in relation to the 14 hectare MOD site that the Ministry of Defence is seeking to release. This site will contribute to the Housing Zone that Hounslow Borough Council had designated by the Mayor of London in 2016. A [revised Feltham Masterplan](#) was produced and approved in 2017 to update and develop the previous vision and masterplan from 2015. This will guide development up to 2032.
- 2.54 The [Adopted planning brief for the Cavalry Barracks site](#) was adopted on 22nd July 2019. It provides landowners and prospective developers with planning guidance to ensure high quality residential-led development is achieved on this 14.85 hectare site once the Ministry of Defence releases it.
- 2.55 The [Houses in Multiple Occupation SPD](#) was adopted on 21st November 2017. It provides guidance on houses in multiple occupation (HMOs) – outlining the expected standards for HMOs, and how planning applications requiring planning permission will be considered and determined.
- 2.56 The [Residential Extension Guidelines SPD](#) was adopted in 2017. It provides information on what the Hounslow Borough Council consider to be acceptable forms of extension to residential properties. The information set out in the SPD ensures that a balance is struck between protecting neighbours' interests, keeping a good quality and attractive street scene, and meeting applicants' reasonable expectations for increase accommodation. It also ensures development achieves the highest possible standards of design. The SPD is due to be superseded by the Residential Extension Guidelines section of the emerging Character, Sustainability and Design Codes SPD
- 2.57 The [West London Cycle Parking Guidance](#) was published in 2017 and adopted by six West London boroughs, including Hounslow. It outlines the need for cycle parking to be considered as early as possible in the planning and design process to ensure appropriate provision is achieved. In particular, it highlights the need for cycle parking to be as convenient, easy to use, and secure as possible.
- 2.58 The [Draft Climate Change Mitigation and Adaptation Supplementary Planning Document \(SPD\)](#) offers guidance for developers who build homes, offices and other buildings within the borough, which helps ensure new and refurbished buildings have net zero carbon emissions and can adapt to future climate change effects. It was first consulted on between 16th June 2023 and 14th August 2023. A second consultation on the emerging SPD will take place in early 2024.
- 2.59 The [Emerging Character, Sustainability and Design Codes SPD](#) is an update to the existing 2014 Urban Context and Character Study. This document updates the character assessment of Hounslow, and proposes design codes for the borough. A final adoption consultation was undertaken between 16th June and 14th August 2023, and the aims of this SPD are as follows:
- Updating the character assessment to provide an up to date understanding of built and socio-economic character.
 - Updating the character area boundaries to form an understanding of local character and to underpin area-based design code recommendations.
 - Proposing area-based recommendations and visions to guide the transformation, enhancement and conservation of each of the character areas; and
 - Developing design codes that ensure the delivery of the area-based recommendations and high quality, characterful and sustainable design in development.

3. Key updates to the baseline

- 3.1 The following summary provides an overview of the key updates to the baseline information since 2016. This overview is presented through the nine themes through which the information was presented for the IIA of the Local Plan Review.
- 3.2 The overview below is not intended to be a comprehensive baseline for the IIA; instead it identifies key updates to the existing baseline information (and sources) which should be considered through the IIA.

Theme 1 - Air quality and noise

- 3.3 According to the latest Air Quality Action Plan prepared for Hounslow (2023-2028)², borough-wide, Hounslow is meeting the existing national objectives for annual mean levels of the gas Nitrogen Dioxide (NO₂) as well Particulate Matter (PM₁₀ and PM_{2.5}).
- 3.4 The UK's existing national air quality objectives are significantly higher than World Health Organisation's (WHO) recommended guideline values, revised in 2021. As such, in the 2018 London Environment Strategy, the Mayor committed to meeting the WHO's previous recommended guideline values, published in 2005, across London by 2030.
- 3.5 Additionally, in September 2021, prior to the World Health Organisation's revision of its recommended guideline limits, Hounslow Council committed to working towards the 2005 WHO guidelines for all three pollutants, which 2022 data shows is being exceeded slightly.

Table 3.1: Air quality in Hounslow

Pollutant	Hounslow 2022 Annual Mean	UK National Legal Objective	WHO 2021 Guideline	WHO 2005 Guideline
Nitrogen Dioxide (NO ₂)	27.9µg/m ³	40 µg/m ³	10 µg/m ³	40 µg/m ³
Particulate Matter (PM ₁₀)	21.4 µg/m ³	40 µg/m ³	15 µg/m ³	20 µg/m ³
Particulate Matter (PM _{2.5})	10.8 µg/m ³	20 µg/m ³	5 µg/m ³	10 g/m ³

- 3.6 Following the revision of the WHO guidelines to much more stringent levels, pollution levels in Hounslow are exceeding the new guidelines and so a key area of the action plan's focus is to help the Mayor meet the 2030 target and work towards the new WHO guidelines.
- 3.7 The highest concentrations of NO₂ in the borough (>45) follow the path of the M4 motorway across the north of the borough, in particular where it meets the A4 (Great West Road), but these concentrations reduce quickly moving away from these roads and larger junctions.

² LBH (2023) Draft Hounslow Air Quality Action Plan https://www.hounslow.gov.uk/downloads/file/3986/view_and_download_the_air_quality_action_plan_2023

- 3.8 Away from major road network pollution levels fall, but are elevated above the 25-28 µg band in two other areas:
- The west of the borough closest to Heathrow Airport
 - South of the centre of the borough around Mogden Sewage Works.
- 3.9 An air quality Focus Area is a location that has been identified as having both high levels of air pollution and human exposure. Air quality Focus Areas have been selected by the GLA as areas where there is the most potential for improvements in air quality in London.
- 3.10 There are five Focus Areas in Hounslow. These are:
- Chiswick Town Centre (A315)
 - Chiswick (A4) Cedars Road/Hogarth Lane
 - Heston A4 Great West Rd/Heston Rd/Lampton Road
 - Hounslow A4 Great West Rd/Vicarage Farm Road
 - Hounslow Town Centre area.

Theme 2 - Biodiversity and green infrastructure

- 3.11 Hounslow includes the following designations:
- Kempton Nature Reserve, which has been designated as a special protection area (SPA)
 - Two sites of special scientific interest (SSSI): These are Syon Park Tide Meadow and parts of Kempton Nature Reserve
 - Ten local nature reserves; and
 - 47 sites dedicated to the importance of nature conservation (SINC)
- 3.12 Some baselining using desktop resources was carried out to aid the development of the Green and Blue Infrastructure Strategy (2021), and further survey work of borough SINC is due to commence in early 2024. This information will inform the IIA for the new Local Plan.

Theme 3 - Climate change

- 3.13 In 2019, Hounslow Council declared a climate emergency and committed to achieving a net zero carbon borough by 2030. The following overview provides a summary of the latest baseline relating to climate change mitigation and adaptation in the borough.

Climate change mitigation

- 3.14 The London Energy and Greenhouse Gas Inventory (LEGGI) is an emissions inventory which quantifies greenhouse gas (GHG) emissions released to the environment. It also quantifies emissions removed through Land Use, Land Change and Forestry sector activities.
- 3.15 According to the LEGGI, borough-wide emissions in Hounslow changed between 2016 and 2019 as set out in the table below. These indicate that whilst total emissions decreased by 8.15%, emissions from transport increased in the same period.
- 3.16 Whilst the latest overview available is from 2020, emissions in this year these were affected significantly by the effects of the COVID-19 pandemic, and as such have not been replicated below.

Table 3.2: Greenhouse gas emissions in Hounslow

Year	Domestic (CO ₂ e)	Industrial and Commercial (CO ₂ e)	Transport (CO ₂ e or CO ₂)	TOTAL
2016	334	405	414	1,154
2019	317	308	423	1,060

Source: <https://data.london.gov.uk/dataset/leggi>

Climate change adaptation

- 3.17 The West London Boroughs of Barnet, Brent, Ealing, Harrow, Hillingdon, and Hounslow produced a joint Level 1 Strategic Flood Risk Assessment (SFRA) in 2018.³ The overarching aim of the SFRA is to provide the evidence base for ensuring development is steered away from areas identified most at risk from all sources of flood risk, reducing the risk of flooding to residents and buildings. This is required to provide an update to existing borough-specific SFRAs, which were predominantly completed in 2008.
- 3.18 The SFRA provides an overview of the flood risk from all sources across the study area, including climate change implications where this information is available. This is supported by a series of web maps to present the flood risk information. It also provides guidance for undertaking Flood Risk Assessments at the site specific and strategic levels. Borough-specific guidance is included where any key differences exist. This is supported by checklists to assist applicants in completing compliant submissions for Flood Risk Assessments and Drainage Strategies.
- 3.19 To provide additional detail to the SFRA for the borough, the Local Flood Risk Management Strategy (LFRMS) for Hounslow was completed in 2022.⁴ This outlines how LBH and other stakeholders will manage local flood risk in the borough in forthcoming years.
- 3.20 The SFRA and the LFRMS highlights that Hounslow is at risk of flooding from multiple sources including tidal (caused by surges in the Thames Estuary), fluvial (from other rivers, such as the rivers Brent and Crane) and surface water, sewers, and groundwater. Significant flooding took place across the borough in July 2021.
- 3.21 As highlighted by the SFRA and LFRMS, future developments and climate change are some of the key factors that are increasing the risk of flooding events. Several key drivers, including urban development expansion, could see an increase in flood risk from various sources. The pressure of accommodating more developments may mean a larger number of developments being proposed for sites within higher risk Flood Zone areas, placing them at greater risk of flooding. The impact of development and projected future population growth may not only have an impact on the flood risk presented by different flood sources, but present a greater overall flood risk to people and properties due to the accumulative risk from each source.
- 3.22 A Surface Water Management Plan was completed in April 2021⁵. As highlighted by the plan, the main sources of surface water flooding are from sewers, drains, groundwater, and runoff from land, small watercourses and ditches, as a result of

³ Metis Consultants Ltd on behalf of West London Boroughs of Barnet, Brent, Ealing, Harrow, Hillingdon, and Hounslow (West London Strategic Flood Risk Assessment Level 1) <https://westlondonsfra.london/>

⁴ Metis Consultants Ltd (August 2022) Local Flood Risk Management Strategy for Hounslow https://www.hounslow.gov.uk/info/20006/environment/2482/flooding_in_hounslow/11

⁵ Metis Consultants on behalf of the London Borough of Hounslow (April 2021) Surface Water Management Plan for London Borough of Hounslow https://www.hounslow.gov.uk/info/20006/environment/2482/flooding_in_hounslow/11

heavy rainfall. In 2021 there were 3,863 properties predicted to be at risk from the 1 in 100-year surface water flood event in the borough

Theme 4 – Equalities, Community and Wellbeing

- 3.23 The Hounslow Data Hub presents comprehensive and up-to-date information on the quality of life and health and wellbeing of Hounslow's residents and communities. This includes information relating to children and young people, crime and community safety, deprivation, health and social care and population statistics.
- 3.24 In association with the Equalities Act 2010, it also presents comprehensive information on equalities, including relating to each of the nine groups with protected characteristics.
- 3.25 The Hounslow Data Hub can be accessed at: <https://stats.hounslow.gov.uk/>

Theme 5 - Cultural heritage and landscape

- 3.26 The Urban Context and Character Study prepared in 2014⁶ comprised a comprehensive borough-wide evaluation of townscape and landscape character in Hounslow. The study identified and analysed the urban character of the borough in order to inform planning policy, design and conservation and future development management. The Emerging Character, Sustainability and Design Codes SPD is an update to the study.⁷ This updates the character assessment, and proposes borough-wide and area-wide design codes. In this respect it will be a key source of information for the IIA.
- 3.27 There are currently 28 conservation areas in Hounslow. These are as follows:
- Bedfont Green
 - Bedford Park
 - The Butts
 - Chiswick High Road
 - Chiswick House
 - Cranford Village
 - Feltham Green & Town Centre
 - Grand Union Canal & Boston Manor
 - Grove Park
 - Gunnersbury Park
 - Hanworth Park
 - Heston Village
 - Hounslow Cavalry Barracks
 - Isleworth Riverside
 - Kew Bridge
 - Old Chiswick

⁶ London Borough of Hounslow (2014) Urban Context and Character Study
https://www.hounslow.gov.uk/info/20034/planning_policy/1097/urban_context_and_character_study

⁷ London Borough of Hounslow (June 2023) Emerging Character, Sustainability and Design Codes SPD
https://www.hounslow.gov.uk/info/20034/planning_policy/2301/emerging_borough_character_and_design_study_spd

- Osterley Park
- Spring Grove
- Stamford Brook
- St Dunstons
- St Paul's Brentford
- St Paul's Hounslow West
- St Stephens
- Strand on the Green
- Thorney Hedge
- Turnham Green
- Wellesley Road
- Woodlands Grove

3.28 Since 2016, conservation area appraisals or updated conservation area appraisals have been prepared for all of the conservation areas in the borough.

3.29 These conservation area appraisals, through defining the special interest of the conservation area that merits its designation, and describing and evaluating the contribution made by the different features of its character and appearance, are key sources of baseline information for each conservation area. The conservation area appraisals can be accessed at:

https://www.hounslow.gov.uk/info/20010/planning_and_building/1868/conservation_area_appraisals_and_maps

Theme 6 - Economy and employment

3.30 The Hounslow Data Hub presents comprehensive and up to date information relating to the economy of the borough and employment. This includes data about the labour market in Hounslow and measures of overall economic activity and levels of worklessness.

3.31 The Hounslow Data Hub, which presents information to the ward level, can be accessed at:

<https://stats.hounslow.gov.uk/economy-and-employment/>

3.32 The Hounslow Employment Land Review assessed the future demand and need for employment land in the borough. According to the Hounslow Employment Land Review 2020 Update⁸:

- In relation to industrial space (including warehousing), the gross demand for development is some 253,000 sq m of floorspace over the plan period 2019-34. For the extended plan period 2019-39, the forecast demand is 299,000 sq m. These figures assume that no existing industrial space is lost in addition to the current pipeline of planning permissions.
- In relation to offices, the gross demand for development as 186,000 sq m of floorspace over the plan period 2019-34 is forecasted, and 209,000 sq m over the

⁸ Stantec on behalf of LBH (July 2020) Hounslow Employment Land Review 2020 Update <https://www.hwa.uk.com/site/wp-content/uploads/2020/11/Core38-Local-Plan-Examination-Library-3.pdf>

extended period 2019-39. This assumes that no existing office space is lost in addition to the current pipeline of planning permissions.

Theme 7 – Housing

3.33 The Hounslow Data Hub presents comprehensive and up to date information relating to housing in the borough. This includes information associated with the following:

- number of properties;
- dwelling counts by type;
- vacant properties;
- property price by type;
- property sales by type;
- properties by council tax band;
- households by accommodation type;
- ownership and tenancy by type;
- household size and number of rooms;
- residents of communal establishments and the type of establishment they reside in; and
- household projections.

3.34 This information can be accessed at:

<https://stats.hounslow.gov.uk/housing>

Theme 8 - Soil contamination and sustainable land use

3.35 As highlighted in the 2020/21 Annual Monitoring Report⁹, the total land take from inappropriate development on land designated Green Belt and Metropolitan Open Land over the last 5 years is 2.17 ha.

3.36 A substantial amount of land in Hounslow is at risk of being contaminated as the borough has an extensive industrial history. Factories, landfill sites, gas works and the military have all operated in the borough and these industries have sometimes polluted the land where they operated. This pollution, or contamination, where present has the potential to harm human health, water supplies, natural habitats and property.

3.37 Whilst a recent borough-wide evaluation of contaminated land has not been carried out, all planning applications (including prior approval and permitted development applications) have to be considered for potential contamination issues to ensure compliance with the Town and Country Planning Act 1990 and the National Planning Policy Framework (NPPF).

⁹ LBH: Hounslow's Local Plan Authority Monitoring Report 2020/21
https://www.hounslow.gov.uk/info/20167/local_plan/1108/local_plan

Theme 9 - Water quality and water resources

- 3.38 According to the Environment Agency's Catchment Data Explorer¹⁰ the Lower Brent Water Body has been assessed as 'moderate' ecological status.
- 3.39 The stated reasons for not achieving 'good' status are diffuse source pollution from urbanisation and contaminated waterbody bed sediments, and point source pollution from intermittent sewage discharge and misconnections. A further stated reason relates to the physical modification of watercourses.
- 3.40 With regards to the Crane Water Body, the Catchment Data Explorer¹¹ highlights a 'moderate' ecological status.
- 3.41 The stated reasons for not achieving 'good' status are diffuse source pollution from urbanisation and Heathrow Airport, and point source pollution from continuous and intermittent sewage discharge, incidents and misconnections. A further stated reason relates to physical modification of the watercourses.

¹⁰ Environment Agency (2023) Catchment Data Explorer <https://environment.data.gov.uk/catchment-planning/WaterBody/GB106039023590>

¹¹ Environment Agency (2023) Catchment Data Explorer <https://environment.data.gov.uk/catchment-planning/WaterBody/GB106039023030>

4. Updated IIA Framework

- 4.1 Drawing on the review of the sustainability context and baseline, the IIA process for the Local Plan Review of Volumes 2, 3 & 4 identified a range of sustainability problems / issues that should be a particular focus of the appraisal, ensuring that it dealt with the most important sustainability issues. These issues were then translated into a 'framework' of objectives and appraisal questions.
- 4.2 Following the review of the updated evidence base for the IIA, the IIA Framework for the Local Plan Review has been revisited. This is with a view to ensuring that the IIA Framework utilised for the new Local Plan is up to date and fit for purpose.
- 4.3 The updated IIA Framework, which is presented below, provides a benchmark or yardstick against which the sustainability effects of the new version of the Local Plan and alternatives can be identified and evaluated based on a structured and consistent approach. In this context, the objectives and appraisal questions which comprise the IIA Framework provide a methodological framework for the appraisal of likely significant effects on the baseline.

Table 4.1: IIA Framework for the new Local plan

IIA Objectives	Appraisal questions. Will the option / proposal help to...	Key issues and opportunities for the borough
Theme 1 - Air quality and noise		
Improve and protect air, land and water quality in the borough	<ul style="list-style-type: none"> • Reduce emissions from key sources of air pollution, including transport? • Contribute to improvements in air quality within the AQMA? • Promote enhancements to green infrastructure networks to facilitate increased absorption and dissipation NO₂ and other pollutants? 	<ul style="list-style-type: none"> • The entire borough is designated as an AQMA due to levels of NO₂. • Road transport is the major source of NO₂ emissions. • In some locations noise levels are particularly high as a result of the presence of Heathrow Airport. The A4 and M4 are also key contributors to noise issues present locally.
Reduce noise pollution	<ul style="list-style-type: none"> • Seek to mitigate the impact on areas likely to be affected by noise, and reducing the noise generated at source and/or containing the noise generated? 	<ul style="list-style-type: none"> • Green infrastructure is a key moderator of air and noise pollution in the borough.
Minimise the need to travel, increase the use of sustainable transport modes (walking, cycling, and public transport)	<ul style="list-style-type: none"> • Encourage a modal shift to more sustainable transport? • Improve sustainable transport access and infrastructure? 	
Theme 2 - Biodiversity and green infrastructure		
Support the integrity of designated sites	<ul style="list-style-type: none"> • Avoid negative impacts, and where possible improve the condition of SSSIs in and around the borough? • Manage pressures on locally designated sites for biodiversity and geodiversity in Hounslow? 	<ul style="list-style-type: none"> • A range of important habitats and species are present in the borough. • The borough contains a number of sites nationally and locally designated for their importance to biodiversity.
Protect and enhance habitats and species	<ul style="list-style-type: none"> • Protect and enhance semi-natural habitats? • Protect and enhance priority habitats, and the habitat of priority species? • Achieve a net gain in biodiversity? • Increase the resilience of Hounslow's biodiversity to the potential effects of climate change? 	<ul style="list-style-type: none"> • The waterways of the borough act as important components of regional ecological networks. • A number of designated sites, including SSSIs and SINCS, have the potential to be further improved for their biodiversity value. • There are large quantities of open space in many parts of the borough, much of which is of a multi-functional nature.
Improve ecological networks across Hounslow and regionally	<ul style="list-style-type: none"> • Contribute to the creation of coherent and resilient ecological networks? 	<ul style="list-style-type: none"> • Areas of brownfield land in the borough are of importance to biodiversity.
Enhance green and blue infrastructure networks across the borough	<ul style="list-style-type: none"> • Facilitate the incorporation of green and blue infrastructure within new development? • Support the provisions of the borough's Green and Blue Infrastructure Strategy? • Improve the quality and quantity of publicly accessible greenspace? 	<ul style="list-style-type: none"> • There are significant opportunities for biodiversity enhancements in the borough. • There are significant opportunities for enhancements to green and blue infrastructure networks across the borough, and

IIA Objectives	Appraisal questions. Will the option / proposal help to...	Key issues and opportunities for the borough
	<ul style="list-style-type: none"> Increase access to open space, parks and parks, woodlands? 	<ul style="list-style-type: none"> improve linkages with neighbourhood boroughs.
Theme 3 - Climate change		
Reduce the contribution to climate change made by activities in Hounslow	<ul style="list-style-type: none"> Reduce the number of journeys made and the need to travel? Promote the use of sustainable modes of transport, including walking, cycling and public transport? Increase the number of new developments meeting or exceeding sustainable design criteria? Generate energy from low or zero carbon sources? Reduce energy consumption from non-renewable resources? 	<ul style="list-style-type: none"> A Climate Emergency was declared by the London Borough of Hounslow in June 2019. Despite recent falls, CO₂ emissions per capita in the borough remain above regional levels. Emissions from transport have seen some recent increases. Average domestic gas and electricity consumption per customer in the borough is high compared to regional averages.
Minimise the need to travel, increase the use of sustainable transport modes (walking, cycling, and public transport)	<ul style="list-style-type: none"> Encourage alternatives to travel by private motor vehicle? Improve sustainable transport access and infrastructure? 	<ul style="list-style-type: none"> Some areas of the borough are poorly served by public transport, particularly in the west and out of centre.
Support the resilience of the borough to the potential effects of climate change, including flooding	<ul style="list-style-type: none"> Ensure that inappropriate development does not take place in areas at higher risk of flooding? Reduce vulnerability to climate change impacts? Improve and extend green and blue infrastructure networks in the borough to support adaptation to the potential effects of climate change? Sustainably manage water runoff, reducing surface water runoff (either within borough or downstream)? Ensure the potential risks associated with climate change are considered through new development? 	<ul style="list-style-type: none"> Hounslow is at risk of flooding from multiple sources including tidal (caused by surges in the Thames Estuary), fluvial (from other rivers, such as the rivers Brent and Crane) and surface water, sewers, and groundwater. Significant flooding took place across the borough in July 2021. As highlighted by the SFRA and LFRMS, future developments and climate change are the two key factors that are increasing the risk of flooding events in the borough.
Theme 4 – Equalities, Community and Wellbeing		
Improve the health and wellbeing of the population	<ul style="list-style-type: none"> Promote healthy lifestyles? Increase levels of physical activity? Reduce health inequalities? Minimise fuel poverty? 	<ul style="list-style-type: none"> The population of the borough has been rising and is projected to continue to do so in future. Older people are expected to become an increasingly large proportion of the population.
Reduce crime and the fear of crime	<ul style="list-style-type: none"> Reduce levels of crime and fear of crime? Protect people and property against crime and disorder? Design out crime? 	<ul style="list-style-type: none"> There are significant pockets of deprivation in the borough. The West of Borough suffers from notable areas of

IIA Objectives	Appraisal questions. Will the option / proposal help to...	Key issues and opportunities for the borough
Ensure equality of opportunity through fair and equal access to services (health care, education, skills training, employment, shopping, transport), culture, leisure and recreation for all residents	<ul style="list-style-type: none"> Promote accessibility to a range of leisure, health and community facilities, for all age groups? Improve access to high quality green infrastructure networks? Encourage more shops, better services in town centres? Promote services that address the needs of the elderly? Promote services that support the needs of younger people? Encourage and promote social cohesion and encourage active involvement of local people in community activities? 	<p>persistent deprivation compared with other parts of the borough.</p> <ul style="list-style-type: none"> The life expectancy of the wider borough residents has been rising, but health inequalities persist. Obesity is a concern, particularly amongst children. There are low levels of physical activity amongst residents. There are rising numbers of students in the borough which will need to be accommodated within the catchment area.
Ensure that the needs of groups with 'protected characteristics' are fully considered	<ul style="list-style-type: none"> Ensure quality for opportunity for all, regardless of age, disability gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, gender, sexual orientation or socio-economic status? 	<ul style="list-style-type: none"> Educational attainment is mixed, as the borough has a regionally high proportion of residents with higher qualifications and no qualifications. Rates of crime in the borough have declined over the past ten years.
Theme 5 - Cultural heritage and landscape		
Conserve and enhance the borough's historic environment	<ul style="list-style-type: none"> Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting? Conserve and enhance the special interest, character and appearance of locally important features and their settings? Support the integrity of the historic setting of key buildings of cultural heritage interest? Support access to, interpretation and understanding of the historic evolution and character of the borough? Conserve and enhance archaeological remains? Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies? 	<ul style="list-style-type: none"> The borough has a rich and diverse historic environment. Numerous features are nationally designated for their historic environment interest. Numerous undesignated features are of local importance of the historic environment. A number of heritage assets have been established at being 'at risk'. There are a range of landscape character types across the borough. The borough has 28 conservation areas. Each of these has up-to date conservation area appraisals which can provide an important contributor to defining the design and layout of development. Inappropriate development in the Great West Corridor has significant potential to have impacts on the setting of key heritage assets in the wider area. This includes the internationally designated
Promote high quality urban design and the use of sustainable construction	<ul style="list-style-type: none"> Enhance local character, streetscape and townscape to strengthen sense of place? Conserve and enhance and local distinctiveness and diversity? 	

IIA Objectives	Appraisal questions. Will the option / proposal help to...	Key issues and opportunities for the borough
	<ul style="list-style-type: none"> Conserve and enhance locally important townscape and landscape features in the borough, including distinctive character types and areas? 	<p>Kew Gardens World Heritage Site, the Grade II* Registered Park and Garden of Gunnersbury Park, a significant number of listed buildings (including the Grade I listed Chiswick House), conservation areas and key views from the River Thames corridor.</p>
Theme 6 - Economy and employment		
<p>Provide opportunities and benefits to the local economy, especially in town centres</p>	<ul style="list-style-type: none"> Diversify the economy, increase resilience to external shocks? Generate diverse new jobs for the area? Support and encourage the growth of small and medium size business? Increase the competitiveness of the borough? Enhance the role and position of the town centres? Promote access to local shopping centres and protects them? 	<ul style="list-style-type: none"> The COVID-19 pandemic has changed the economic roles of town and local centres in the borough. This includes an increase in vacancy rates. Traditional industry has declined, with a move to service sector opportunities. The economy of parts of the West of Borough is dominated by Heathrow. The majority of businesses in the West of Borough are small and young, with strong local supply chains.
<p>Maintain and enhance the importance of the key centres in the borough as employment centres in the west London and London-wide context through attracting new economic development that provides a range of jobs in appropriate locations</p>	<ul style="list-style-type: none"> Encourage entrepreneurial activity in disadvantaged areas? Create opportunities for the unemployed? Provide a satisfying job or occupation for everyone who wants one? Encourage the provision of more locally based skills and facilities? 	<ul style="list-style-type: none"> There is significant demand for workspace for start-ups and SMEs in parts of the borough (including in the Great West Corridor). However, the existing office space for these businesses is frequently unsuited for their purposes. There are significant vacancies in the office stock and the underuse of some of the buildings has led to inappropriate conversion of office to residential use through permitted rights. Borough residents are more likely to work in lower order occupations, with higher level workers employed from outside the borough. Household incomes are slightly lower than the London average.
Theme 7 - Housing		
<p>Provide everyone with the opportunity to live in good quality, sustainably constructed, affordable housing, and ensure an appropriate mix of</p>	<ul style="list-style-type: none"> Encourage provision of a mixture of housing types and tenure to meet the needs of different groups, including families and young people? 	<ul style="list-style-type: none"> There is strong demand for housing, with the number of households in the wider borough increasing at a faster rate than the population.

IIA Objectives	Appraisal questions. Will the option / proposal help to...	Key issues and opportunities for the borough
dwelling sizes, types and tenures.	<ul style="list-style-type: none"> Support enhancements to the current housing stock? Provide quality and flexible homes that meet people's needs? Promote the use of sustainable building techniques, including use of sustainable building materials in construction? Provides for the needs of Gypsies, Travellers and Travelling Showpeople? 	<ul style="list-style-type: none"> Property prices in the borough are well above the national average, but below the average for London. Overcrowding is a concern in the borough, with dwellings generally smaller than average. There is a relatively small amount of social housing in the borough, high waiting lists, and increasing need. There are high levels of affordable housing need in the borough, particularly to the west and in central Hounslow. BME groups are proportionately more likely to be in housing need. The West of Borough provides a large proportion of London's Gypsy, Traveller and Travelling Showpeople accommodation needs.
Theme 8 - Soil contamination and sustainable land use		
Promote the efficient use of land and protect and improve land and soil quality in the borough	<ul style="list-style-type: none"> Minimise the development of greenfield land? Facilitate development on land with the least environmental / amenity value? Reduce vacant buildings and bring derelict land into use? Support enhancements to environmental quality, including soil and land quality? 	<ul style="list-style-type: none"> The borough's industrial past has led to significant areas of land requiring remediation. A large proportion of recent new housing in the borough has taken place on brownfield land.
Theme 9 - Water quality and water resources		
Use and manage water resources in a sustainable manner	<ul style="list-style-type: none"> Limit water consumption to levels supportable by natural processes? Encourage the increased use of water efficiency measures? 	<ul style="list-style-type: none"> The borough is in an area considered to be considerably water stressed. Rates of water consumption need to fall if 2030 targets are to be met.
Improve and protect water quality in the borough	<ul style="list-style-type: none"> Support improvements in the water quality of rivers and groundwater supplies? Facilitate the use of sustainable urban drainage systems? 	<ul style="list-style-type: none"> Water quality is important to the borough's biodiversity. Only one of the borough's watercourses is in good ecological condition. Climate change is likely to increase water stresses regionally and impact on both the frequency and the severity of flood events.

5. Next steps

- 5.1 This IIA Scoping Paper accompanies the focused consultation (Regulation 18) on the LBH's approach to consolidating the Local Plan Review documents into a single Local Plan with necessary updates and changes to reflect the passage of time.
- 5.2 Following the receipt of consultation responses, the draft Local Plan will be prepared by LBH and released for Regulation 19 consultation.
- 5.3 The IIA Report will be presented for Regulation 19 consultation alongside the draft version of the Local Plan, and will present the information required by the SEA Regulations.
- 5.4 In line with the SEA Regulations, the IIA Report will answer the three questions:
 - What has plan-making / IIA involved up to this point?
 - Including with regards to the consideration of 'reasonable alternatives'
 - What are the appraisal findings at this current stage?
 - i.e. in relation to the policies currently proposed for the Local plan, as presented in the draft version of the Local Plan document
 - What are the next steps for plan making?
- 5.5 These questions are derived from Schedule 2 of the SEA Regulations, which set out 'the information to be provided within the [environmental] report'.
- 5.6 It is currently anticipated that Regulation 19 consultation on the Local Plan and IIA Report will take place in summer 2024.
- 5.7 Once the period for representations on the Regulation 19 version of the new Local Plan / IIA Report has finished, the main issues raised will be identified and summarised by LBH, which will then consider whether, in light of representations received, the plan can still be deemed 'sound'. If this is the case, the new Local Plan will be submitted to the Secretary of State for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the IIA Report alongside it.
- 5.8 At Examination, the Inspectors will consider representations (alongside the IIA Report) before then reporting back. If the Inspectors identify the need for modifications to the Local Plan, these will be prepared (and undergo IIA) and will then be subject to consultation (with an IIA Report Addendum published alongside).
- 5.9 Once found to be 'sound', the new Local Plan will be formally adopted by LBH. At the time of adoption, a IIA 'Statement' must be published that sets out (amongst other elements) "the measures decided concerning monitoring the Plan"

