



**London Borough  
of Hounslow**

**Hounslow Local Plan 2020-2041**

**Statement of Common Ground**

**Between**

**London Borough of Hounslow**

**And**

**London Borough of Richmond upon Thames**

**Version 2  
30/05/2025**

## 1. Introduction

- 1.1. This Statement of Common Ground (SoCG) has been prepared between the London Borough of Hounslow (LBH) and London Borough of Richmond upon Thames (LBRuT). LBH and LBRuT are neighbouring local authorities, and therefore subject to the duty to cooperate.
- 1.2. This SoCG seeks to inform the independent examination of the proposed submission version of the Hounslow Local Plan 2020-2041 and will be submitted to the Planning Inspector alongside the local plan and other supporting documents.
- 1.3. 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 in July 2023 and indefinitely pause work on a Focused Issues Review of the Local Plan Vol.1.
- 1.4. LBH undertook a Regulation 18 consultation between 1<sup>st</sup> November and 17<sup>th</sup> 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, undertaking a Regulation 19 consultation on the draft Local Plan between 6<sup>th</sup> September and 28<sup>th</sup> 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 to the Secretary of State for examination.
- 1.5. LBRuT submitted its emerging 'Publication' Richmond Local Plan on the 19<sup>th</sup> January 2024. Examination hearings were held in June and July 2024, and a Main Modifications consultation was held from 31<sup>st</sup> January to 17<sup>th</sup> March 2025. The new Local Plan is due to be adopted in October 2025.
- 1.6. This SoCG sets out both parties' agreed positions in relation to strategic cross boundary matters relating to LBH's emerging Local Plan which have been identified through formal representations, and during duty to cooperate meetings and subsequent correspondence.

## 2. Background

- 2.1. LBH and LBRuT 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 initiating the current draft of the Hounslow Local Plan, engagement took place on the now-withdrawn Local Plan Review for the Great West Corridor, West of Borough, and Site Allocations DPDs. This process resulted in LBRuT signing up to two SoCGs: the [LB Hounslow Joint Statement of Common Ground \(September 2020\)](#) (relating to general strategic matters) and the [LB Hounslow, Royal Botanical Gardens Kew & LBRuT SoCG](#)

[\(December 2020\)](#) (relating specifically to matters relating to heritage and tall buildings within the Great West Corridor plan area).

- 2.3. More recently, LBH has engaged with LBRuT on the production of the emerging Richmond Local Plan. This led to the production of a [Statement of Common Ground between London Borough of Richmond upon Thames and London Borough of Hounslow \(June 2024\)](#) which focuses primarily upon engagement between both parties on strategic matters with a focus on the emerging Richmond Local Plan.
- 2.4. Both parties have also engaged on the production of LBH's single Local Plan, now known as the Hounslow Local Plan 2020-2041.
- 2.5. LBH contacted LBRuT on 20th October 2023 to request engagement on the Regulation 18 consultation on the consolidated single Local Plan (which ran between 1<sup>st</sup> November and 17<sup>th</sup> December 2023). LBRuT confirmed by email that officers had reviewed LBH's Regulation 18 Statement, and noted the summary of the proposed changes to bring together as a single consolidated Local Plan. LBRuT confirmed that no duty to cooperate meeting was required at this stage, and that both parties would engage further at Regulation 19 stage when a draft version of the emerging Plan was available for review. LBRuT also confirmed that, as per previous engagement, housing and the historic environment remain strategic, cross-boundary issues, with site allocations, transport impacts, the River Thames, protection of designated open spaces and land for biodiversity discussed previously as being important issues in the vicinity of the shared boundary. LBRuT did not submit a representation to the Regulation 18 consultation.
- 2.6. LBH contacted LBRuT on 6<sup>th</sup> September 2024 to request engagement on the Regulation 19 consultation on the proposed submission version of the Hounslow Local Plan 2020-41. The Regulation 19 consultation ran between 6<sup>th</sup> September and 28<sup>th</sup> October 2024.
- 2.7. A duty to cooperate meeting was held on 8<sup>th</sup> October 2024. The key matters discussed at the meeting related to:
  - Approach to housing
  - Approach to employment
  - Proposed context and character policies, including engagement on potential tall buildings and heritage impacts affecting Royal Botanic Gardens, Kew WHS
  - Green Belt and Green and Blue infrastructure
  - Transport connectivity
  - Energy and Carbon Reduction Policy
  - LBRuT updated on Richmond Local Plan progress.
- 2.8. LBRuT submitted 2 representations to the Regulation 19 consultation of the draft Hounslow Local Plan. The representation sent by email on 28<sup>th</sup> October 2024 relates to the plan as a whole, with broadly supportive comments on each policy chapter. A further representation was submitted by email on 8<sup>th</sup> November 2024 (in line with an agreed extension to the deadline) focusing on Chapter 6 (Context and Character) and strategic, cross-boundary issues in relation to tall buildings and the impact on views and settings of key heritage assets, especially on the Royal Botanic Gardens Kew World Heritage Site (Kew WHS) and its buffer zone, as well as Conservation Areas and river views, within the London Borough of Richmond upon Thames. The latter representation raised various soundness concerns

related to policies P1 (a-c), CC1, CC3 and CC4, and proposes various suggested modifications to address these.

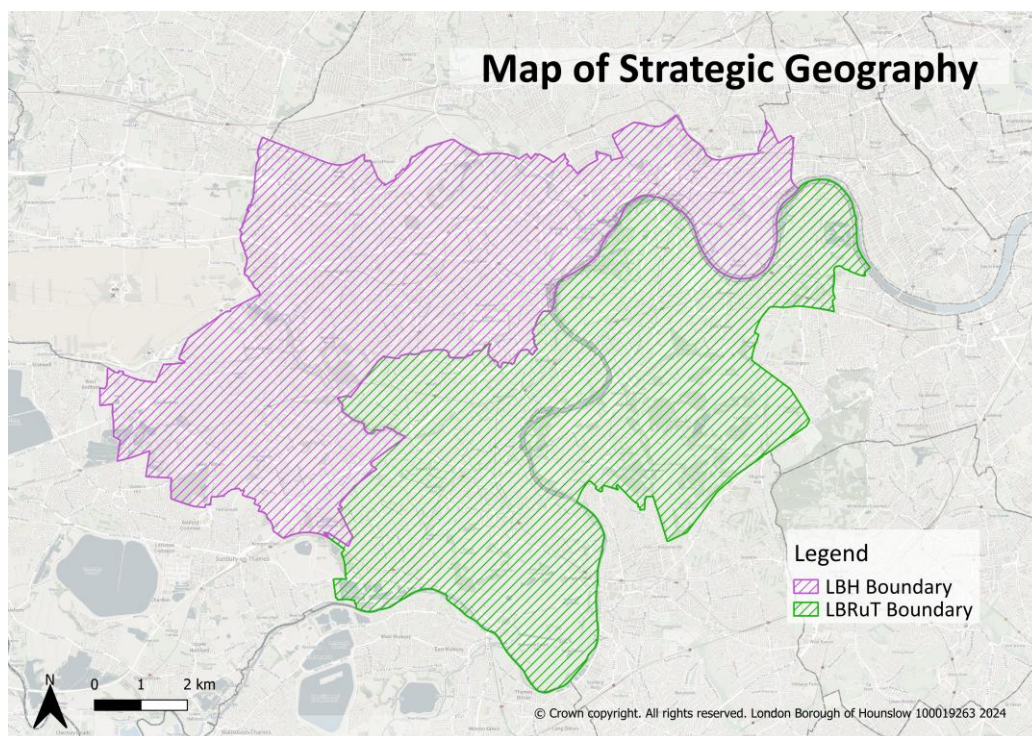
2.9. Following the Regulation 19 consultation, a combined duty to cooperate meeting was held on 8<sup>th</sup> January 2025 between LBH, LBRuT, Historic England (HE) and Royal Botanic Gardens, Kew (RBGK) to discuss cross boundary strategic matters relating to the approach to tall buildings and the impact on views and settings of the Royal Botanic Gardens Kew World Heritage Site and its buffer zone. Note LBH displayed online during the meeting a working table with comments and modifications, but the details were not made available to attendees from other organisations. Key matters presented by LBH included:

- Key matters and potential modifications where common ground was perceived to exist at this time, as put forward by LBH, particularly in relation to:
  - Corrections to Policy CC3 wording and figures for accuracy and consistency
  - Mapping amendments for clarification
  - Clarifications around the status of the GWC Masterplan & Tall Buildings Study, and definitions
  - Minor correction to references to significant adverse impacts, and to heritage impact assessments and townscape analysis
  - Amendments to the HIA in the Tall Buildings study appendix
  - Additional references to HIAs and ICOMOS guidance in Policy CC4, and engagement with RBGK and LBRuT
  - General policy formatting points
- Key matters where common ground was not perceived to exist at this time, as put forward by LBH:
  - HE request for detailed HIAs for site allocations
  - Various updates to GWC Masterplan
  - Amendments to tall buildings heights in GWC to reflect differing views on harm to Outstanding Universal Value (OUV) of Kew WHS
- General discussion on approaches to agreeing positions within a single or multiple SoCG/s.

2.10. Following the meeting, both parties corresponded via email to discuss the most effective way to demonstrate engagement on strategic matters through a SoCG, especially in light of the need to coordinate with other parties (HE and RBGK) on tall buildings and heritage matters. In light of HE's desire to pursue a bilateral LBH & HE SoCG with LBH, it was decided that LBH, LBRuT and RBGK should enter into a Joint LBH, LBRuT & RBGK SoCG (to be finalised later in 2025) to agree positions on tall buildings and heritage (including the impact on Kew WHS), and that LBH and LBRuT should enter into this bilateral SoCG to agree positions on all other strategic matters (see section 4 below).

2.11. In the intervening period, a draft Joint LBH, LBRuT & RBGK SoCG (relating to heritage matters) has been shared with LBRuT and RBGK, including a schedule of suggested modifications to be agreed with these parties (as originally discussed at the joint Duty to Cooperate meeting on 8<sup>th</sup> January 2025). As set out in the [Duty to Cooperate Compliance Statement \(S10\)](#), this was sent to LBRuT & RBGK in late June 2025.

### 3. Strategic Geography



**Figure 1:** Map of strategic geography

3.1. The map above (Figure 1) describes the strategic geography considered for cooperation on strategic matters as part of this Statement of Common Ground. The area contains the administrative areas of LB Hounslow and LB Richmond upon Thames.

#### 4. Strategic Matters and Record of Agreement

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

- **Spatial Strategy**
- **Town Centres & Retail**
- **Economic Development**
- **Housing (including Gypsy, Traveller and Travelling Showperson accommodation)**
- **Green and Blue Infrastructure**
- **Transport and Highways**
- **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. In cases where there are matters which cannot be agreed at this time, these are set out as outstanding matters under each matter below. As noted at paragraph 2.2 above, the Historic Environment has also been recognised as a strategic matter, but is covered in a separate Statement of Common Ground.

##### 4.3. Spatial Strategy

###### ***Background***

4.3.1. In their Regulation 19 representation LBRuT reiterate previous agreements relating to neither party being able to accommodate any unmet housing and employment needs from the other, whilst noting that there should be continued liaison on strategic matters going forward. LBRuT note the spatial strategies for the ten study areas linked to the Hounslow Characterisation and Growth Study, and that other policies within the emerging plan consider implications beyond the borough boundary through the decision-making process on planning applications.

###### ***Record of agreement***

4.3.2. Both parties agree to continued liaison on strategic cross-boundary matters identified within this SoCG.

###### ***Outstanding Matters?***

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

##### 4.4. Town Centres & Retail

###### ***Background***

4.4.1. In their Regulation 19 representation LBRuT note Site Allocation 95: Tesco Mogden Lane which proposes a mixed retail/residential scheme in this location close to the shared boundary. LBRuT note the existing Tesco has a significant role to play in meeting Richmond borough residents' weekly shopping needs, particularly those living in the west of our borough, however LBRuT confirm that they continue to not raise any objection to the proposed site allocation.

- 4.4.2. LBRuT wish to be kept informed of any proposal coming forward so that officers can assess implications of changes in retail provision for our borough residents.

***Record of agreement***

- 4.4.3. Both parties acknowledge the robustness of one another's evidence base for retail needs.
- 4.4.4. LBH will seek to consult LBRuT on any future planning application on the Tesco Mogden Lane site given its proximity to the shared borough boundary.

***Outstanding Matters?***

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

**4.5. Economic Development**

***Background***

- 4.5.1. Both parties have shared the findings of their respective employment evidence base studies during duty to cooperate meetings.
- 4.5.2. The Richmond Employment Land and Premises Needs Assessment 2021 and 2023 Update identifies a shortfall of both office and industrial floorspace, recognising that there are few options to address the latter due to constraints on delivering additional industrial floorspace.
- 4.5.3. LBH's most up to date employment land evidence (the Employment Land Review Update 2024, or ELR 2024) identifies a requirement for 255,600 sqm of additional industrial floorspace (255,300 sqm allowing for completions and permissions) in the West of the Borough area during the period 2020-41, and 208,200 sqm of net additional industrial floorspace (194,400 sqm allowing for completions and permissions) in the remainder of the borough. In terms of office floorspace (comprising offices and workshop floorspace), the ELR 2024 identifies a requirement for 204,621 sqm of additional floorspace over the period 2019-43 (197,240 sqm once completions and permissions are taken into account).
- 4.5.4. LBH has undertaken a capacity assessment of available sites across the borough. LBH has allocated existing sites for industrial intensification and has also needed to allocate additional new sites for additional employment development through selective releases from the Green Belt (in line with LBH green belt review evidence). Overall, LBH are seeking to allocate 138,600 sqm of net additional industrial floorspace (163,600 sqm gross floorspace) in the West of the Borough area; 86,300 sqm of net additional industrial floorspace (210,900sqm gross floorspace) in the remaining areas of the borough; and 61,200 sqm of net additional office floorspace (182,700 sqm gross floorspace) across the borough.
- 4.5.5. In their Regulation 19 representation LBRuT note LBH's approach toward providing land for employment development in emerging Policy ED1, and toward safeguarding existing employment supply in Policy ED2. LBRuT notes the findings of the ELR 2024 with respect to the identification of substantial unmet need for employment

floorspace over the plan period. LBRuT also note the designation of a new LSIS at Twickenham Trading Estate and Hampton Business Park which is close to the shared boundary.

4.5.6. Through previous duty to cooperate cooperation, both parties have established that neither authority is able to help meet the other's unmet employment floorspace needs, however it is considered appropriate to continue to liaise on matters relating to employment land.

#### ***Record of agreement***

4.5.7. LBH is seeking to meet a significant proportion of its employment floorspace needs as identified through the ELR Update 2024. LBH does not have any spare employment floorspace capacity to assist LBRuT in meeting its unmet needs.

4.5.8. LBRuT safeguards land for additional office and industrial floorspace, but new sites are difficult to identify due to constraints. LBRuT does not have any spare employment floorspace capacity to assist LBH in meeting its unmet needs.

4.5.9. Both parties acknowledge the robustness of one another's evidence base for employment needs.

#### ***Outstanding Matters?***

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

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

#### ***Background***

4.6.1. LBRuT and LBH are London boroughs, and as such their strategic housing targets are established through the London Plan. The London Plan (2021) Policy H1 'Increasing housing supply' sets the following 10-year targets for net housing completions to 2029 at Table 4.1:

- LBRuT: 4,110 dwellings (or 411 dwellings per annum/dpa)
- LBH: 18,720 dwellings (or 1,872 dpa)

4.6.2. Both parties are seeking to meet their 10-year London Plan housing targets, and have derived housing targets for the remainder of their plan periods which they are also planning to meet. LBH are ultimately planning to deliver 28,840 homes by 2041 through the emerging Plan, and LBRuT are planning to deliver 5,928 homes over the Local Plan period from 2024 and by 2039.

4.6.3. Both parties have produced housing evidence to support their draft plans, which seek to ensure that the housing provided meets the needs of the population in terms of tenure, type and size. LBRuT has produced its Local Housing Needs Assessment (2021 and 2023 update). LBH has produced the Hounslow Local Housing Needs Assessment update (2024).

- 4.6.4. In terms of meeting Gypsy, Traveller and Travelling Showperson (GTTS) accommodation needs, both parties have undertaken evidence to identify their level of need over the plan period.
- 4.6.5. LBH commissioned a Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTTSANA) (2019) to establish objectively assessed housing needs for these groups.
- 4.6.6. LBH has a demonstrated need for 26 Gypsy and Traveller pitches and 12 Travelling Showpeople plots over the period from 2018-2033. This forms the basis of LBH's GTTS housing target in the emerging Hounslow Local Plan<sup>1</sup>.
- 4.6.7. LBH has demonstrated exceptional circumstances to release two sites from the green belt in order to fully meet the its targets for Gypsy and Traveller and Travelling Showpeople accommodation: Land North of Church Road, Cranford; and Land South of Bedfont Road, Feltham.
- 4.6.8. LBRuT have produced updated research on Gypsies and Travellers (2023) which does not identify a need for additional pitches or any cross-boundary issues. In their response to LBRuT's Regulation 19 plan consultation, LBH noted the findings of LBRuT's Research on Gypsies and Travellers and the associated policy position within Policy 12C.

***Record of agreement***

- 4.6.9. LBH is planning to meet its London Plan 2021 10-year housing target, and its capacity-based target for the remaining years of the plan period to 2041 (in line with London Plan paragraph 4.1.11). LBH does not have any spare housing capacity to assist LBRuT in meeting any unmet needs.
- 4.6.10. LBRuT is planning to meet its London Plan 2021 10-year housing target to 2029, and has set an indicative target beyond 2032 of 306 net housing completions per annum, based on rolling forward in accordance with the London Plan identified capacity for large sites and the small sites figure. LBRuT does not have any spare housing capacity to assist LBH in meeting any unmet needs.
- 4.6.11. LBH is planning to meet its targets for Gypsy and Traveller and Travelling Showpeople accommodation. LBH does not have any spare capacity to assist LBRuT in meeting its unmet GTTS needs.
- 4.6.12. LBRuT does not have any spare capacity to assist LBH in meeting its unmet GTTS needs.
- 4.6.13. Both parties acknowledge the robustness of one another's evidence base for housing and GTTS accommodation.

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<sup>1</sup> In accordance with Policy H14 of the London Plan, which states boroughs must include ten-year GTTS targets in their Development Plan Documents.

- 4.6.14. Both parties note the early work being undertaken to review the London Plan and will continue to engage with the review process.

***Outstanding Matters?***

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

**4.7. Green and Blue Infrastructure**

***Background***

- 4.7.1. In their Regulation 19 representation LBRuT note the continued cooperation on the approach to the River Thames (which defines a significant extent of the shared boundary), and note that protection of designated open spaces and land for biodiversity are cross-boundary issues. LBRuT note the emerging policy framework supports cross-boundary working, including through the Thames Landscape Strategy. LBRuT also notes a number of proposed green grid and travel links at the borough boundary which the mapping shows as coming into LBRuT, noting these have been set out in the Hounslow Green and Blue Infrastructure Strategy, and confirms that there are shared aspirations to enhance green and blue infrastructure provision in these locations.
- 4.7.2. As London boroughs, both parties are feeding into the production of the London Local Nature Recovery Strategy (LNRS) which is being prepared by the Mayor of London in order to fulfil the requirements of the Environment Act 2021. The LNRS will build upon existing local biodiversity strategies and evidence to provide a strategic plan for nature recovery across the London region.

***Record of agreement***

- 4.7.3. Both parties will continue to cooperate on the development of opportunities for cross-boundary green and blue infrastructure improvements where these are identified through borough strategies and/or development proposals.
- 4.7.4. Both parties will continue to cooperate on the Thames Landscape Strategy refresh.
- 4.7.5. Both parties will continue to cooperate on the production of the London LNRS.

***Outstanding Matters?***

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

**4.8. Transport and Highways**

***Background***

- 4.8.1. In their Regulation 19 representation LBRuT note previous engagement with LBH on transport and highways matters relating to the emerging Richmond Local Plan as set out in the existing [Statement of Common Ground between London Borough of Richmond upon Thames and London Borough of Hounslow \(June 2024\)](#).
- 4.8.2. LBRuT confirm that these principles are also considered to be captured in LBH's emerging Policies EC1 – Strategic Transport Connections and IMP3 – Implementing and Monitoring the Local Plan. LBRuT suggest a modification could be made to introduce a cross-reference between the policies for clarity.
- 4.8.3. LBRuT also suggest it may be useful to propose a modification to reference the continued joint working with neighbouring authorities and TfL in relation to establishing impacts of development proposals on the road and transport networks beyond the borough boundary, and to ensure consistency with the wording agreed in the Statement of Common Ground.
- 4.8.4. LBRuT note a number of active travel links that cross the borough boundary in Figure EC1: Strategic Transport Connections and Improvements, and suggest that the development of cross-boundary active travel links should be subject to detailed discussions with LBRuT transport planners as there is a shared aspiration to improve these routes.

***Record of agreement***

- 4.8.5. LBH consider that it is not necessary to present any further modifications to policies EC1 or IMP3 to introduce a cross-references between the policies as this would not address any fundamental matters of soundness, however if the Inspector considers it necessary we would be open to discussing this further through the examination.
- 4.8.6. LBH consider Policy EC1 provides a robust approach to working with neighbouring boroughs and TfL to deliver necessary strategic transport improvements, including beyond the borough boundary. LBH consider that this SoCG further supports continued joint working in relation to establishing and mitigating the impacts of development proposals beyond the borough boundary. TfL are a prescribed body and statutory consultee, and LBH are in the process of agreeing a separate SoCG with TfL which will include positions on continued joint-working on transport matters. LBH consider it is therefore not necessary to present any further modifications as suggested by LBRuT at this time, however if the Inspector considers it necessary we would be open to discussing this further through the examination.
- 4.8.7. LBRuT note the consideration by LBH that such a modification is not necessary. The suggestion was made on the basis that part N of Policy IMP3 is focused on Implementation and Monitoring, whereas Policy EC1 is the key policy that developers/applicants would need to address in terms of strategic transport connections, and part P only references beyond the borough boundary in terms of mitigation. However, it is recognised that this relates to clarity and LBRuT are not raising as a matter of soundness. Through the decision-making process there is a framework to assess cross-boundary impacts including with TfL and other boroughs. LBRuT recognise this is a matter that can be considered by the Inspectors if necessary.

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

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

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

#### ***Outstanding Matters?***

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

### **4.9. Site Allocations**

#### ***Background***

4.9.1. In their Regulation 19 representation, LBRuT note the proposed allocation of the following sites in proximity to the shared boundary: Site 95 - 'Tesco Mogden Lane', Site 97 - '30 Rugby Road', and Site 110 – 'Albany Riverside'. LBRuT note these sites have been allocated in previously adopted and proposed development plan documents.

4.9.2. LBRuT confirm that there is a policy framework to ensure future liaison on any major development proposals that could have implications beyond the borough boundary - for example to take account of retail, transport or heritage impacts – through the decision-making process on planning applications. LBRuT confirm that they raise no further comments on the details of any proposed site allocations.

#### ***Record of agreement***

4.9.3. Both parties agree to engage and consult one another on major planning applications which may have cross-boundary implications through the development management process.

#### ***Outstanding Matters?***

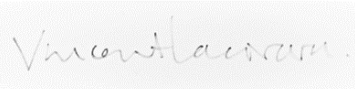
4.9.4. There are no outstanding issues related to this matter at this time.


**5. Governance Arrangements**

- 5.1. It is agreed that informal discussions will occur between both parties on the cross boundary issues and strategic matters referred to in this Statement of Common Ground in the form of officer level meetings, ideally at least once every twelve months, with reporting of matters to Member level if necessary.
- 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 ideally 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.

<b>Signed on behalf of LB Hounslow</b>		
<b>Name and position</b>	<b>Signature</b>	<b>Date</b>
<b>Vincent Lacovara Director of Planning and Buildings</b>		<b>30/09/2025</b>

<b>Signed on behalf of LB Richmond-Upon-Thames</b>		
<b>Name and position</b>	<b>Signature</b>	<b>Date</b>
<b>Adam Hutchings Spatial Planning and Design Team Manager</b>		<b>30/09/2025</b>