



**London Borough
of Hounslow**

Hounslow Local Plan 2020-2041

Statement of Common Ground

Between

London Borough of Hounslow

And

London Borough of Hammersmith & Fulham

Version no. 2

30/09/2025

1. Introduction

- 1.1. This Statement of Common Ground (SoCG) has been prepared between the London Borough of Hounslow (LBH) and London Borough of Hammersmith & Fulham (LBH&F). It seeks to inform the independent examination of the proposed submission version of the Hounslow Local Plan 2020-2041 and will be submitted to the examining Inspector ahead of the examination hearing sessions.
- 1.2. LBH adopted their Local Plan 2015-2030 Volumes 1 & 2 in 2015. As instructed by their Inspector at that time, LBH went on to undertake a partial review of the local plan focusing on 2 key growth areas: the Great West Corridor and Heathrow (known as the 'West of Borough') opportunity areas. Following extensive consultation, LBH submitted three development plan documents (DPDs, one for each area and an update to the Vol.2 Site Allocations DPD) for examination in December 2020, with examination hearing sessions taking place in November/December 2021. Following the hearing sessions, a number of procedural issues were identified which led LBH to withdraw these DPDs and pause work on a Focused Issues Review of the Local Plan Vol.1.
- 1.3. LBH undertook a Regulation 18 consultation between 1st November and 17th December 2023 focusing on a proposal to consolidate the emerging DPDs into a single Local Plan document, and to update emerging policies in line with relevant considerations. Following this, LBH prepared updates to key evidence base documents and developed the proposed submission version of the Hounslow Local Plan 2020-2041, undertaking a Regulation 19 consultation on the draft Local Plan between 6th September and 28th October 2024. LBH is now in the process of analysing and collating responses received and preparing any additional work required (including agreeing SoCG with relevant parties) prior to submission to the Secretary of State for examination.
- 1.4. LBH&F adopted their Local Plan in February 2018. LBH&F are currently in the early stages of preparing a new Local Plan and an updated Local Development Scheme (LDS). The new plan will cover the period from 2027 to 2042 and the council is gathering evidence and preparing a draft local plan, aiming to undertake a Regulation 18 consultation in autumn 2025. LBH&F have undertaken extensive engagement with LBH throughout the various stages of the production of the emerging Hounslow Local Plan. A full record of engagement to date is provided in section 2 below.
- 1.5. The SoCG sets out both parties' agreed positions in relation to strategic cross boundary matters identified during duty to cooperate meetings and subsequent correspondence.

2. Background

- 2.1. LBH and LBH&F 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 LBH&F signing up to the [LB Hounslow Joint Statement of Common Ground](#) (September 2020).
- 2.3. The most recent engagement under the duty to cooperate has been set out in the table below:

Date	LBH&F Local Plan engagement	LBH Local Plan engagement
01/11/2023	-	<i>LBH Regulation 18 Consultation begins</i>
13/12/2023	-	Duty to Cooperate Meeting to discuss LBH's proposed submission draft Local Plan (Reg18). Key matters discussed: <ul style="list-style-type: none"> • Discussion around approach to the single Local Plan and procedural points • Likely strategic points to cover at Reg19 around any boundary sites, river-related issues and town centres • Discussion around how new plan would approach Biodiversity Net Gain and Urban Greening Factor
17/12/2023	-	<i>LBH Regulation 18 Consultation closes</i>
06/09/2024	-	<i>LBH Regulation 19 Consultation begins</i>
07/10/2024	-	Duty to Cooperate Meeting to discuss LBH's proposed submission draft Local Plan (Reg19). Key matters discussed: <ul style="list-style-type: none"> • Housing • Green Spaces • Heathrow Opportunity Area • Biodiversity Net Gain • Economic Development • Net Zero and Climate Policy • LBH&F Local Plan Update
28/10/2024	-	<i>LBH Regulation 19 Consultation closes</i>
March 2025	-	<i>Email exchange between both parties agreeing to enter into a SoCG on the following matters: housing, employment, open space/environment and infrastructure.</i>
27/08/2025	Informal DtC Meeting to discuss LBH&F's upcoming Regulation 18 consultation on the Local Plan. Key matters discussed: <ul style="list-style-type: none"> • Presentation of the H&F Reg 18 draft Local Plan main changes • Update on LBH&F evidence base work (completed and outstanding) • LBH&F updated plan production timeline (LDS update) • Update on emerging strategic sites near boundary • SoCG arrangements 	-

2.4. It should also be noted that LBH and LBH&F are members of the West London Alliance (WLA) Planning Policy Officers Group. This forum provide additional opportunities for cooperation on strategic matters relating to the West London sub-region.

3. Strategic Geography

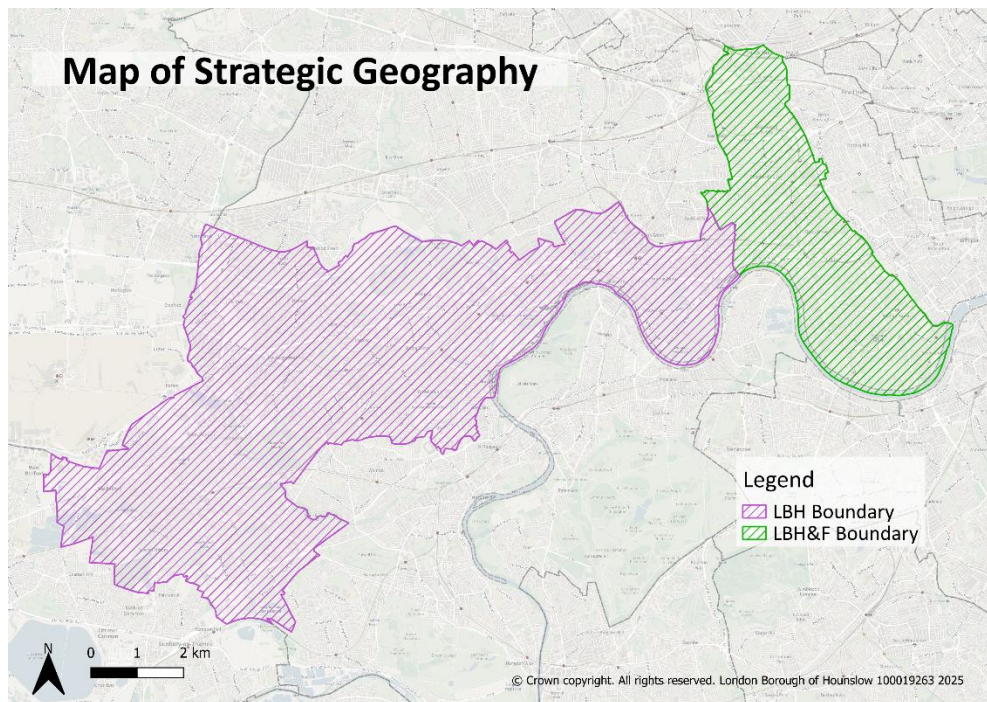


Figure 1: Map of strategic geography

- 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 Hammersmith & Fulham.

4. Strategic Matters and Record of Agreement

- 4.1. Through ongoing duty to cooperate engagement between LBH and LBH&F, the following key strategic matters have been identified:
 - **Housing (including Gypsy, Traveller and Travelling Showpeople accommodation)**
 - **Employment**
 - **Open Space/Environment**
 - **Infrastructure (including Transport)**
- 4.2. These matters are set out in more detail below, with a description of the relevant background to the matter in question and a record of agreement provided.
- 4.3. **Housing (including Gypsy, Traveller and Travelling Showpeople accommodation)**

Background

- 4.3.1. LBH&F 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 at Table 4.1:
 - LBH&F: 16,090 dwellings (or 1,609 per annum/dpa)
 - LBH: 18,720 dwellings (or 1,872 per annum/dpa)
- 4.3.2. 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.
- 4.3.3. Both parties have produced housing evidence to support their adopted or emerging plans, which seek to ensure that the housing provided meets the needs of the population in terms of tenure, type and size. LBH&F has produced an updated Local Housing Needs Assessment (LHNA) to inform the emerging Local Plan, which also considers new typologies such as co-living accommodation and build to rent. The current Local Housing Need figure for Hammersmith and Fulham is 2,769 dwellings per annum under the May 2025 Standard Method target. The LHNA bases its findings on this number, noting however that this figure would only apply to Hammersmith and Fulham if the London Plan was not extant. The LHNA also notes that the new capacity targets for each Borough are not yet determined and that the current H&F housing target of 1,609 under the London Plan is unlikely to be the final capacity target for the borough. The Local Housing Need Figure under the Standard Method for Hammersmith and Fulham as a whole includes the area covered by the Old Oak and Park Royal Development Corporation (OPDC). Policy HO1 sets out how local housing needs will be met -this does not include reliance on L B Hounslow.
- 4.3.4. The LBH&F LHNA projects a net increase of 31,600 households in the borough over the plan period 2027-2042. It projects a total housing need of 41,535 dwellings over the plan period, of which 22,519 are to be affordable housing.

- 4.3.5. LBH has produced the Hounslow Local Housing Needs Assessment update (2024).
- 4.3.6. In terms of meeting Gypsy, Traveller and Travelling Showperson (GTTS) accommodation needs, both parties have undertaken evidence to identify the level of need over the plan period.
- 4.3.7. LBH commissioned a Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTTSANA) (2019) to establish objectively assessed housing needs for these groups.
- 4.3.8. 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 Plan¹.
- 4.3.9. LBH has demonstrated exceptional circumstances to release two sites from the green belt in order to fully meet its targets for Gypsy and Traveller and Travelling Showpeople accommodation: Land North of Church Road, Cranford; and Land South of Bedfont Road, Feltham.
- 4.3.10. LBH&F has a shared site with RBKC and produced a Joint Needs Assessment with RBKC in 2022 which confirms that LBH&F has no outstanding need.

Record of agreement

- 4.3.11. 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 LBH&F in meeting its unmet needs.
- 4.3.12. In their adopted Local Plan (2018) LBH&F set out a strategic housing target based on the London Plan 2016 10-year housing target of 10,310 homes to 2025. The council's current housing target in the London Plan (2021) is 1,609 additional homes a year in the period up to 2029. As part of their emerging Local Plan, LBH&F will seek to exceed the London Plan (2021) minimum target of 1,609 additional dwellings a year up to 2029 and to continue to seek at least 1,609 additional dwellings a year in the period up to 2042. LBH&F does not have any spare housing capacity to assist LBH in meeting its unmet needs.
- 4.3.13. LBH is planning to meet its targets for Gypsy and Traveller and Travelling Showpeople accommodation. LBH does not have any spare capacity to assist LBH&F in meeting its unmet GTTS needs.

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

- 4.3.14. LBH&F is planning to meet all of its GTTS accommodation needs. LBH&F does not have any spare capacity to assist LBH in meeting its unmet GTTS needs.
- 4.3.15. Both parties acknowledge the robustness of one another's evidence base for housing and GTTS.
- 4.3.16. Both parties note the early work being undertaken to review the London Plan and will continue to engage with the review process.

Outstanding Matters?

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

4.4. Employment

Background

- 4.4.1. Both parties have shared the findings of their respective employment evidence base studies during duty to cooperate meetings.
- 4.4.2. 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).
- 4.4.3. 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.
- 4.4.4. LBH&F has commissioned an updated Employment Land Study which considers needs, provides sector and property market analysis and projections for office and industrial land with the plan period (5 years) and looking up to 20 years ahead. It forecasts an additional 133,310 sqm of office floorspace over the period 2023-41, rising to 160,241 sqm once a replacement for losses is factored in, equivalent to 14.2% of the current supply of office floorspace in the Borough. The industrial land forecast identifies a limited decrease in the need for industrial land in Hammersmith and Fulham to 2041, taking account of the constraints posed by Hammersmith and Fulham being an inner

London Borough with limited vacant development land and industrial development opportunities outside of the OPDC area.

Record of agreement

4.4.5. 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 LBH&F in meeting its unmet needs.

4.4.6. LBH&F does not have any spare employment floorspace capacity to assist LBH in meeting its unmet needs.

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

Outstanding Matters?

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

4.5. Open Space/Environment

Background

4.5.1. Both parties discussed potential cross-boundary strategic open space/green infrastructure matters at a duty to cooperate meeting on 02/10/2024.

4.5.2. LBH undertook a Green Belt review in 2015, followed by a Stage 2 review in 2019. Whilst the now withdrawn Local Plan Review included proposals to redesignate some Green Belt sites as Metropolitan Open Land (MOL), this has not been pursued within the emerging Hounslow Local Plan.

4.5.3. LBH clarified that adjustments to green belt boundaries are proposed in some limited cases where exceptional circumstances have been demonstrated to release sites to meet employment needs.

4.5.4. LBH&F confirmed that they are only concerned with changes to MOL and as such do not object to the release of green belt sites.

4.5.5. The River Thames passes through both borough boundaries, and as such both parties are subject to the Thames Landscape Strategy.

4.5.6. 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

4.5.7. 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.

4.5.8. Both parties will continue to cooperate on the Thames Landscape Strategy refresh.

4.5.9. Both parties will continue to cooperate on the production of the London LNRS.

Outstanding Matters?

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

4.6. Infrastructure (including Transport)

Background

4.6.1. LBH presented an overview of the approach to transport infrastructure provision set out in the emerging Hounslow Local Plan.

4.6.2. LBH&F do not raise any issues in relation to infrastructure at this time.

4.6.3. The West London Orbital (WLO) is a proposed 11-mile-long extension of the Transport for London Overground rail network that will link Hendon to the north-east with Kew and Hounslow in the south-west via South Acton and Acton Central. Both parties have been working together and with Transport for London and other West London authorities to develop the business case for the WLO, particularly in identifying development capacity around WLO stations. The Strategic Narrative (October 2021) produced jointly by the West London Alliance and TfL suggests that it will help generate 15,800 new homes.

Record of agreement

4.6.4. Both parties note continued support for the WLO extension and will engage with key stakeholders through the established channels.

4.6.5. 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.

4.6.6. 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.

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

Outstanding Matters?

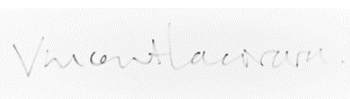
4.6.8. There are no outstanding issues related to this matter at this time.


5. Governance Arrangements

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

6. Signed confirmation

- 6.1. The contents of this Statement of Common Ground are agreed for the purposes of the examination of the proposed submission version of the LB Hounslow Local Plan 2020-2041.

Signed on behalf of LB Hounslow		
Name and position	Signature	Date
Vincent Lacovara Director of Planning & Building		30.09.25

Signed on behalf of LB Hammersmith & Fulham		
Name and position	Signature	Date
David Gawthorpe Team Leader, Policy and Spatial Planning		29.09.25