

# Integrated Impact Assessment (IIA) for the Hounslow Local Plan Review

**IIA Report Non-Technical Summary (accompanying Regulation 19  
consultation)**

London Borough of Hounslow

August 2024

## Quality information

<b>Prepared by</b>	<b>Checked by</b>	<b>Verified by</b>	<b>Approved by</b>
CB: Principal Environmental Planner	NCB: Technical Director	IM: Associate Director	IM: Associate Director

## Revision History

<b>Revision</b>	<b>Revision date</b>	<b>Details</b>	<b>Name</b>	<b>Position</b>
V1.0	August 2024	Consultation version	CB	Principal Environmental Planner

Prepared for:

London Borough of Hounslow

Prepared by:

AECOM Limited  
3rd Floor, Portwall Place  
Portwall Lane  
Bristol BS1 6NA  
United Kingdom

T: +44 117 901 7000  
aecom.com

© 2024 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited (“AECOM”) for sole use of our client (the “Client”) in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.

## Table of Contents

1.	Introduction .....	1
1.1	Background .....	1
1.2	The IIA Report and this Non-Technical Summary (NTS) .....	1
1.3	Vision and objectives of the HLP .....	2
2.	Plan-making and IIA work to date.....	3
2.1	The scope of the IIA .....	3
2.2	Assessment of alternatives.....	4
2.3	Options for housing growth.....	5
2.4	Options for employment growth.....	7
2.5	Options for tall buildings .....	8
2.6	Options for transport.....	10
2.7	Developing the preferred approach .....	11
3.	Assessment findings at this stage .....	14
3.1	Assessing the pre-submission version of the HLP .....	14
3.2	Conclusions .....	14
3.3	Cumulative effects .....	15
3.4	Recommendations.....	17
4.	Next steps and monitoring .....	18
4.1	Next steps.....	18
4.2	Monitoring.....	18

# 1. Introduction

## 1.1 Background

- 1.1.1 AECOM has been commissioned to lead an Integrated Impact Assessment (IIA) in support of the emerging Hounslow Local Plan 2020-2041 (HLP). The HLP will replace the current adopted Local Plan and guide future development within the London Borough of Hounslow in the period up to 2041. It is anticipated that the HLP will undergo examination in 2025.
- 1.1.2 IIA fulfils the requirements for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)<sup>1</sup> and discharges the duties for Equalities Impact Assessment (EqIA)<sup>2</sup> and Health Impact Assessment (HIA)<sup>3</sup>. A Habitats Regulations Assessment (HRA) is also being undertaken for the HLP, the findings of which have been reported separately from, but will inform, the IIA.
- 1.1.3 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 effects and maximising opportunities for positive effects. Through this approach, the IIA for the HLP seeks to maximise the plan's contribution to sustainable development and the quality of life of residents.

## 1.2 The IIA Report and this Non-Technical Summary (NTS)

- 1.2.1 The SEA Regulations stipulate that a report (the IIA Report) must be published for consultation alongside the draft plan that “*identifies, describes, and evaluates*” the likely significant effects of implementing “*the plan, and reasonable alternatives*”. The report must then be considered when finalising the plan.
- 1.2.2 This is a Non-Technical Summary (NTS) of the IIA Report for the HLP (the IIA Report is available separately). It is published alongside the ‘pre-submission’ version of the Plan, under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2.3 The IIA report has been structured in three ‘parts’ to address the key requirements stipulated by the SEA Regulations. Each part seeks to answer the following three questions:
  - 1. What has plan-making/ IIA involved up to this point? (including in relation to ‘reasonable alternatives’)

---

<sup>1</sup> As prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (The SEA Regulations). SA is a legal requirement for Local Plans.

<sup>2</sup> As a public sector organisation, the Council has a duty under the Equality Act 2010 and the associated Public Sector Equality Duty (PSED) to ensure that the objectives and policy options within the LPR eliminate unlawful discrimination and advance equality of opportunity, fostering good relations between those with protected characteristics (age, sex, marital status, disability, gender reassignment, ethnicity, religion, pregnancy and maternity, sexual orientation, and deprived/ disadvantaged groups). An EqIA is used to demonstrate how this duty has been met.

<sup>3</sup> National Planning Practice Guidance identifies that Local Planning Authorities should ensure that health and wellbeing, and health infrastructure, are considered through the Local Plan process.

2. What are the IIA findings at this stage? (i.e., in relation to the current draft plan).
3. What happens next?

1.2.4 These three parts/ questions are summarised within this NTS.

## **1.3 Vision and objectives of the HLP**

1.3.1 The HLP takes forward the vision for the borough set out in Opportunity Hounslow.<sup>4</sup> Opportunity Hounslow sets out a 'Prosperity and Place' framework identifying a vision of long-term transformation of Hounslow's places. The vision is set out under the following priorities:

- Retain Hounslow's economic activity.
- Re-skill and re-employ Hounslow's residents.
- Reimagine Hounslow's future economy.
- Regenerate Hounslow.

1.3.2 It also takes forward the vision set out in the Corporate Plan which sets the priorities for a greener, healthier, cleaner, thriving, safer, and liveable Hounslow.

1.3.3 To support this, the HLP identifies eight objectives, which are as follows:

- Objective 1: Supporting our town centres
- Objective 2: Promoting economic growth and inward investment
- Objective 3: Delivering sustainable mixed communities
- Objective 4: Reinforcing local character and context
- Objective 5: Maximising the benefits of our green and blue infrastructure
- Objective 6: Delivering community infrastructure
- Objective 7: Ensuring environmental quality
- Objective 8: Enhancing connectivity

---

<sup>4</sup> [Opportunity Hounslow](#)

## 2. Plan-making and IIA work to date

### 2.1 The scope of the IIA

2.1.1 In line with regulatory requirements, the scope of the IIA has been consulted upon and agreed with the Environment Agency, Historic England, and Natural England (in October 2023). The main output from scoping (following a review of the sustainability context and baseline) is a range of sustainability problems/ issues that should be a particular focus of the IIA. These issues are translated into an IIA ‘framework’ of themes and objectives which provide a methodological framework for the subsequent assessment (providing a way in which the sustainability effects of the HLP and alternatives can be identified and analysed based on a structured and consistent approach). A summary of the IIA framework is presented below.

**Table 2.1: IIA framework**

IIA theme	IIA objective
Air quality and noise	Improve and protect air, land, and water quality in the borough.
	Reduce noise pollution.
	Minimise the need to travel, increase the use of sustainable transport modes (walking, cycling, and public transport).
Biodiversity and green infrastructure	Support the integrity of designated sites.
	Protect and enhance habitats and species.
	Improve ecological networks across Housing and regionally.
	Enhance green and blue infrastructure networks across the borough.
Climate change	Reduce the contribution to climate change made by activities in Hounslow.
	Minimise the need to travel, increase the use of sustainable transport modes (walking, cycling, and public transport).
	Support the resilience of the borough to the potential effects of climate change, including flooding.
Equalities, community, and wellbeing	Improve the health and wellbeing of the population.
	Reduce crime and the fear of crime.
	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.
	Ensure that the needs of groups with ‘protected characteristics’ are fully considered.
Cultural heritage and landscape	Conserve and enhance the borough’s historic environment.
	Promote high quality urban design and the use of sustainable construction.
Economy and employment	Provide opportunities and benefits to the local economy, especially in town centres

IIA theme	IIA objective
	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.
Housing	Provide everyone with the opportunity to live in good quality, sustainably constructed, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.
Soil contamination and sustainable land use	Promote the efficient use of land and protect and improve land and soil quality in the borough.
Water quality and water resources	Use and manage water resources in a sustainable manner.  Improve and protect water quality in the borough.

## 2.2 Assessment of alternatives

- 2.2.1 A key element of the IIA process is the appraisal of ‘reasonable alternatives’ for the HLP. In line with regulatory requirements, there is a need to explain how work has been undertaken to develop and then appraise reasonable alternatives, and how the Council considers the appraisal findings when developing the preferred approach for the plan.
- 2.2.2 Chapters 4, 5, and 6 of the IIA Report describe how the IIA process to date has informed the Regulation 19 version of the HLP, including potential locations for proposed development. Focus is paid to how the emerging HLP has been developed in terms of a consideration of the sites available for potential allocation and the distribution and approach to future development. To this end, the sites available for development have been assessed through the IIA process. The findings are presented in the Technical Annex accompanying the IIA Report.
- 2.2.3 Options were also explored around the following themes: housing growth, employment growth, the location of tall buildings, and transport. These themes were chosen given their direct links to core HLP objectives and their potential for significant effects (noting that Planning Practice Guidance is clear that SA (and thus IIA) should focus on matters likely to give rise to significant effects).
- 2.2.4 With regards to methodology, for each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see section 1.3) as a methodological framework. Green shading is used to indicate significant positive effects, whilst red shading is used to indicate significant negative effects, and significant effects are indicated in the text. Where appropriate neutral effects, or uncertainty will also be noted. Uncertainty is also highlighted with grey shading.
- 2.2.5 Where there is a need to rely on assumptions to reach a conclusion on a ‘significant effect’ this is made explicit in the appraisal text. Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This

is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of ‘significant effects’. Numbers are used to highlight the options that are most favourably performing from an IIA perspective with ‘1’ being the highest ranking. ‘=’ has been used to highlight where options perform equally or cannot be differentiated between.

## 2.3 Options for housing growth

2.3.1 The following five options for housing growth have been identified and assessed:

- **Option H1:** Hounslow seeks to meet housing needs derived by the NPPF Standard Methodology over the period 2020-2041 (in the region of 66,108 new homes).
- **Option H2:** Hounslow seeks to meet the London Plan 10-year target for housing delivery in the period up to 2029; needs over the remainder of the plan period to 2041 would be derived by the NPPF Standard Methodology (approximately 53,813 new homes over the plan period).
- **Option H3:** Hounslow seeks to meet the London Plan 10-year target for housing delivery in the period up to 2029; housing delivery over the remainder of the plan period would be informed by a capacity-led approach (in the region of 28,840 new homes).
- **Option H4:** Hounslow seeks to meet the London Plan 10-year target for housing delivery in the period up to 2029 and housing delivery over the remainder of the plan period would be informed by a capacity-led approach, with no Green Belt land release for employment (approximately 25,800 new homes).
- **Option H5:** Hounslow seeks to identify land to meet the London Plan 10-year target for housing delivery in the period up to 2029 only (in the region of 16,038 new homes).

2.3.2 The summary of the assessment of these options is provided below.

IIA theme	IIA outcomes	Option H1	Option H2	Option H3	Option H4	Option H5
Air quality and noise	Significant effect?	Yes - negative	Yes - negative	Yes - negative	Yes - negative	Yes - negative
	Rank	5	4	3	2	1
Biodiversity and green infrastructure	Significant effect?	Yes - negative	Yes - negative	Uncertain	Uncertain	Uncertain
	Rank	5	4	2	1	3
Climate change	Significant effect?	Yes - negative	Yes - negative	No	No	Yes - negative
	Rank	3	3	2	1	4
Equalities, community, and wellbeing	Significant effect?	Yes - positive	Yes - positive	Yes - positive	Yes - positive	No

IIA theme	IIA outcomes	Option H1	Option H2	Option H3	Option H4	Option H5
	Rank	4	3	1	2	5
Cultural heritage and landscape	Significant effect?	Yes - negative	Yes - negative	Uncertain	Uncertain	Yes - negative
	Rank	5	4	2	1	3
Economy and employment	Significant effect?	Yes – negative	Yes – negative	Yes – positive	Uncertain	Yes – positive
	Rank	5	4	1	3	2
Housing	Significant effect?	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive
	Rank	1	2	3	4	5
Soil contamination and sustainable land use	Significant effect?	Yes - negative	Yes - negative	No	No	Yes-negative
	Rank	5	4	2	1	3
Water quality and water resources	Significant effect?	No	No	No	No	No
	Rank	5	4	2	1	3

2.3.3 The options propose varying levels of growth and identify how/ where this growth could be delivered. A key difference relating to Options H1 and H2 is that higher levels of growth would need to extend housing development into the established Green Belt. This has implications for the IIA themes of air quality and noise, biodiversity and green infrastructure, climate change, community wellbeing, cultural heritage and landscape, economy and employment, sustainable land use and soil resources, and water quality and water resources. These implications suggest that these options rank less favourably against these themes. The benefits of this expansion relate solely to housing delivery and conversely the options rank highly against this theme.

2.3.4 Option H5 notably only plans for development in the early part of the plan period, with the potential for speculative development in the latter part of the plan period. The option is not reflective of the likely overall level of growth over the entire plan period and in the absence of a plan-led approach fewer benefits are likely to be realised. However, this option would avoid development in the Green Belt (in the absence of adjustments through the local plan process) and as such, would help avoid some impacts associated with the release of such land for development.

2.3.5 Options H3 and H4 focuses primarily on urban intensification and densification and utilises a capacity-led approach to determine the overall level of growth. The focus on brownfield development in the most accessible areas of the borough frequently leads to more favourable rankings for these options. However, it is noted that it would be unlikely that full employment land needs could be met under Option H4 (avoiding employment and housing development within the Green Belt) which has implications for the

economy and employment IIA theme. Option H3 by allowing limited employment growth on Green Belt sites within the Heathrow Opportunity Area has better potential to deliver against the full range of employment land needs.

## 2.4 Options for employment growth

2.4.1 The following five options for employment growth have been identified and assessed:

- **Option E1:** The Local Plan seeks to deliver the full requirement for additional employment land (identified as being 664,907 m<sup>2</sup> (gross) in the Employment Land Review Update), including through the release of Green Belt land.
- **Option E2:** The Local Plan seeks to deliver the full requirement for additional employment land (identified as being 664,907 m<sup>2</sup> (gross) in the ELR Update), whilst avoiding any releases of Green Belt land.
- **Option E3:** The Local Plan seeks to optimise the delivery of new employment land (providing approximately 556,600 m<sup>2</sup> (gross) of floorspace) including through the release of Green Belt land.
- **Option E4:** The Local Plan seeks to optimise the delivery of new employment land (providing approximately 426,270 m<sup>2</sup> (gross) of floorspace) but avoids any release of Green Belt land.
- **Option E5:** Hounslow does not allocate any land for employment development purposes (a 'do nothing' scenario).

2.4.2 The summary of the assessment of these options is provided below.

IIA theme	IIA outcomes	Option E1	Option E2	Option E3	Option E4	Option E5
Air quality and noise	Significant effect?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	5	4	3	2	1
Biodiversity and green infrastructure	Significant effect?	Yes – negative	No	No	No	No
	Rank	5	3	4	2	1
Climate change	Significant effect?	No	No	No	No	No
	Rank	4	2	3	2	1
Equalities, community, and wellbeing	Significant effect?	Yes – negative	Yes – negative	Yes – positive	Yes – negative	No
	Rank	4	5	1	3	2
Cultural heritage and landscape	Significant effect?	Yes – negative	Yes – negative	Uncertain	Uncertain	No
	Rank	4	3	2	2	1

IIA theme	IIA outcomes	Option E1	Option E2	Option E3	Option E4	Option E5
Economy and employment	Significant effect?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – negative
	Rank	1	2	3	4	5
Housing	Significant effect?	Yes – negative	Yes – negative	No	Yes – negative	No
	Rank	4	5	1	3	2
Soil contamination and sustainable land use	Significant effect?	Yes – negative	No	Yes – negative	No	No
	Rank	3	1	3	1	2
Water quality and water resources	Significant effect?	Yes – negative	No	Yes – negative	No	Uncertain
	Rank	3	1	3	1	2

2.4.3 Whilst Option E5 ranks favourably under four IIA themes, unlike Options E1-E4, no significant positive effects are predicted under any of the IIA themes for this option. In addition, Option E5 is the only option where significant negative effects are predicted under the economy and employment IIA theme. Ultimately, as this option does not deliver any planned employment growth in Hounslow, it is less likely to deliver against the forecasted employment land needs for the plan period.

2.4.4 Significant positive effects are predicted under the equalities, community and wellbeing and economy and employment IIA themes for Option E3 recognising that this option has the potential to support housing development land needs alongside employment land needs. Significant negative effects are predicted under the communities and housing IIA themes for Options E1, E2, and E4. This is because these options reduce the land available for potential housing allocations and are likely to undermine the housing strategy in this respect.

2.4.5 In addition, significant negative effects are predicted under the soil contamination and sustainable land use and water quality and water resources IIA themes for Options E1 and E3, whilst significant negative effects are also predicted under the biodiversity and green infrastructure and cultural heritage and landscape IIA themes for Options E1 and E2. Therefore, Option E1 is less favourable, despite performing well under some IIA themes.

## 2.5 Options for tall buildings

2.5.1 The following three options for tall buildings have been identified and assessed:

- **Option TB1:** Focus the development of tall buildings within areas identified as potential appropriate locations as identified through existing tall buildings work in the Great West Corridor.

- **Option TB2:** Facilitate the development of tall buildings at potential appropriate locations identified through a borough-wide tall buildings study. This would include locations such as the Great West Corridor, Brentford, Chiswick, Hounslow, Feltham town centres.
- **Option TB3:** Seek to spread development over a wider area through low to mid-rise densification, with a presumption against the delivery of tall buildings.

2.5.2 The summary of the assessment of these options is provided below.

IIA theme	IIA outcomes	Option TB1	Option TB2	Option TB3
Air quality and noise	Significant effect?	No	Yes - positive	No
	Rank	2	1	3
Biodiversity and green infrastructure	Significant effect?	No	No	No
	Rank	2	1	3
Climate change	Significant effect?	No	No	No
	Rank	2	1	3
Equalities, community, and wellbeing	Significant effect?	Yes - positive	Yes - positive	Yes - positive
	Rank	=	=	=
Cultural heritage and landscape	Significant effect?	Uncertain	Uncertain	Uncertain
	Rank	=	=	=
Economy and employment	Significant effect?	Yes - positive	Yes - positive	Yes - positive
	Rank	1	1	2
Housing	Significant effect?	Yes - positive	Yes - positive	Yes - positive
	Rank	2	2	1
Soil contamination and sustainable land use	Significant effect?	No	No	No
	Rank	1	1	2
Water quality and water resources	Significant effect?	No	No	No
	Rank	1	1	2

2.5.3 Most notably, Options TB1 and TB2 have increased potential to support the clustering of taller buildings at appropriate locations in the most accessible areas of the borough close to existing key services and facilities. This is likely to more positively affect the IIA themes of air quality and noise, biodiversity and green infrastructure, climate change, economy and employment, sustainable land use, and water quality, with significant positive effects considered likely in relation to community wellbeing and economy and employment.

2.5.4 Option TB3 through promoting a wider dispersal of lower density development, has increased potential to deliver a broader range of types and tenures of housing across a wider area.

## 2.6 Options for transport

2.6.1 The following three options for tall buildings have been identified and assessed:

- **Option T1:** Delivery of major new rail access improvements to serve the borough alongside wider measures to improve sustainable transport access and active travel opportunities.
- **Option T2:** An enhanced package of focused transport improvements in the absence of major rail schemes (e.g., increased bus service improvements, demand management measures, and junction improvements).
- **Option T3:** No planned transport improvements. Necessary transport improvements will be determined through the development management (planning application) process.

2.6.2 The summary of the assessment of these options is provided below.

IIA theme	IIA outcomes	Option T1	Option T2	Option T3
Air quality and noise	Significant effect?	Yes – positive	Yes – positive	No
	Rank	1	2	3
Biodiversity and green infrastructure	Significant effect?	Uncertain	No	No
	Rank	3	1	2
Climate change	Significant effect?	No	No	No
	Rank	1	2	3
Equalities, community, and wellbeing	Significant effect?	Yes – positive	Yes – positive	No
	Rank	1	2	3
Cultural heritage and landscape	Significant effect?	Uncertain	Uncertain	No
	Rank	3	2	1
Economy and employment	Significant effect?	Yes – positive	Yes – positive	No
	Rank	1	2	3
Housing	Significant effect?	Yes – positive	Yes – positive	No
	Rank	1	2	3
Soil contamination and sustainable land use	Significant effect?	Uncertain	No	No
	Rank	3	1	2

IIA theme	IIA outcomes	Option T1	Option T2	Option T3
Water quality and water resources	Significant effect?	Yes – positive	Yes – positive	No
	Rank	1	2	3
2.6.3	<p>Option T1 performs the most favourably overall, ranking first under six IIA themes and with significant positive effects predicted under five IIA themes. Option T2 also performs well, ranking first or second under every IIA theme and with significant positive effects also predicted under five IIA themes. Whilst these options – particularly Option T1 – have increased potential to impact on key biodiversity, heritage, landscape, soil and land resources, they support improvements to air and noise quality, climate change mitigation and adaptation, equalities, community and wellbeing, housing and water quality and resources to a greater degree than Option T3. In addition, impacts on environmental resources can be minimised through the implementation of good design and mitigation measures.</p>			
2.6.4	<p>Option T3 ranks least favourably under six of the IIA themes. Whilst this option is less likely to lead to direct impacts on biodiversity, heritage and landscape, it also does not deliver the significant sustainable transport improvements essential for the delivery of growth that helps limit impacts on air and noise quality and greenhouse gas emissions. It will also do less to support access to services, facilities and employment opportunities for all members of the community.</p>			

## 2.7 Developing the preferred approach

2.7.1 The following presents an overview of the London Borough of Hounslow Council's reasons for selecting the preferred approaches for the HLP in light of the alternatives considered.

### Housing

2.7.2 Having reviewed the reasonable options assessment, LBH consider that Option H3 performs the best overall against the nine of the IIA themes and objectives. It is the only option to achieve positive significant effects within three of the appraisal themes (equalities, community, and wellbeing; economy and employment; and housing), and therefore performs strongly against the economic and social dimensions of sustainable development. Whilst a likely negative significant effect is noted against the air quality and noise theme, it should be noted that all options are assessed as having a potential negative effect, with H3 ranked 2nd (below H4 which includes slightly fewer homes to be delivered). The appraisal also notes that larger-scale growth options provide good opportunities for strategic interventions to improve air quality and noise due to economies of scale, and that options which promote higher levels of intensification and densification are considered more likely to reduce air quality impacts associated with transport.

2.7.3 No significant effects (positive or negative) are noted against the themes of climate change, soil contamination and sustainable land and water quality and water resources. The assessment concludes that there remains uncertainty around whether or not there would be significant effects for biodiversity and green infrastructure and cultural heritage and landscape

themes, however options H1 and H2 are assessed as having significant negative effects for both themes, and H5 for cultural heritage and landscape themes. It is anticipated that detailed policy will address these issues sufficiently.

- 2.7.4 In light of the above, LBH consider that Option H3 represents the most balanced approach to meeting our housing need whilst delivering sustainable development, and is thus the preferred Housing Growth option.

### **Employment**

- 2.7.5 Having reviewed the reasonable options assessment, LBH consider that Option E3 performs the best overall against the nine IIA themes and objectives. It is the only option found to have significant positive effects against two themes: equalities, community, and wellbeing; and economy and employment. This is in recognition that has the potential to balance housing delivery alongside a significant proportion of identified needs for employment land. As such, E3 performs the most favourably in terms of balancing the social and economic dimensions of sustainable development.

- 2.7.6 All options are considered to have a negative effect of significance against the air quality and noise theme, with E3 ranked the middle option of the five assessed. Whilst H3 performs less favourable against the themes of soil contamination and sustainable land use and water quality and water resources than E2, E4 and E5 (given negative effects of significance due to land take on green belt greenfield land) it should be noted that this options performs better than E1 and there is uncertainty over Option E5's effect on water quality due to the unplanned nature of growth under this option. It would be anticipated that an appropriate policy framework could be devised to mitigate against these significant effects to reduce their severity to acceptable levels. It is also noted there are uncertainties around the effect of E3 upon biodiversity and green infrastructure (associated with greenfield land take but potentially mitigated by compensatory improvements to remaining GB land, including habitat creation and enhancement, and uncertainties around final design of sites) and cultural heritage and landscape (which will depend upon final design and layout, and the potential for compensatory improvements to offset impacts).

- 2.7.7 Overall LBH consider that Option E3 represents the most balanced approach to meeting our employment need whilst delivering sustainable development, and is thus the preferred Employment Growth option.

### **Tall Buildings**

- 2.7.8 Having reviewed the reasonable options assessment, LBH consider that Option TB2 performs the best overall against the nine IIA themes and objectives. It is the only option to be assessed as having significant positive effects in against four themes: Air quality and noise (the only option to do so); Equalities, community, and wellbeing; Economy and employment and Housing. This is because TB2 increases the potential to support the clustering of taller buildings at appropriate locations in the most accessible areas of the borough close to existing key services and facilities. Whilst TB1 would also facilitate this, given the concentration of tall buildings would be solely within the Great West Corridor, this option scores less favourably then

TB2 which seeks a wider spread of appropriate locations backed by evidence base findings.

- 2.7.9 It is noted that the appraisal concludes that there is some uncertainty about the potential for significant effects for the Cultural heritage and landscape theme given the potential for various impacts under each option, it is acknowledged that each option has the potential to avoid significant effects arising by careful planning and policy mitigation.
- 2.7.10 Overall LBH consider that Option TB2 represents the most balanced approach to planning for tall buildings whilst delivering sustainable development, and is thus the preferred tall buildings option.

### **Transport Options**

- 2.7.11 Having reviewed the reasonable options assessment, LBH consider that Option T1 performs the best overall against the nine IIA themes and objectives. Whilst T1 and T2 have the same number of positive significant effects recorded against the same themes (Air quality and noise; Equalities, community, and wellbeing; Economy and employment; Housing; and Water quality and water resources), T1 ranks highest overall.
- 2.7.12 There are uncertainties around the effects of T1 against Biodiversity and green infrastructure; Cultural heritage and landscape; and Soil contamination and sustainable land use. For Biodiversity, it is acknowledged that the main potential for impact would be from habitat loss/fragmentation caused by Southern Access to Heathrow, however the specifics of this are not known at this time. The appraisal concludes that the effects on the historic environment have the potential to be both positive and negative under Options T1 and T2, and an additional level of growth facilitated through Option T1 will not necessarily lead to increased negative effects on the historic environment of the borough. Finally, the appraisal concludes that whilst there is the potential for T1 to support the efficient use of land / intensify land uses, there is also the potential for the loss of Greenfield land to facilitate new rail extensions and new stations, although this remains uncertain at this time. It is anticipated that all of these issues could be resolved by having an effective policy framework in place to ensure impacts and suitably mitigated.
- 2.7.13 In light of the above, LBH consider that Option T1 represents the most balanced approach to enhancing accessibility in the borough and unlocking growth whilst delivering sustainable development, and is thus the preferred transport option.

## 3. Assessment findings at this stage

### 3.1 Assessing the pre-submission version of the HLP

- 3.1.1 Chapters 7, 8 and 9 of the IIA Report present an appraisal of the HLP, as currently published under Regulation 19 of the Planning Regulations. The HLP presents a total of 67 policies that include site allocations across the borough.
- 3.1.2 In terms of methodology, the appraisal identifies and evaluates the 'likely significant effects' of the HLP on the baseline, drawing on the nine IIA objectives identified through scoping (see **Table 2.1**) as a methodological framework.
- 3.1.3 Within the appraisal narrative (in the IIA Report) specific policies are referred to only as necessary and relevant to each IIA theme (i.e. it is not the case that systematic consideration is given to the merits of every plan policy in terms of every sustainability objective).
- 3.1.4 Effects are predicted taking account of the effect characteristics and 'significance criteria' presented within Schedules 1 and 2 of the SEA Regulations.<sup>5</sup> So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects.
- 3.1.5 The overall conclusions of this appraisal, cumulative effects, and recommendations are presented within this NTS.

### 3.2 Conclusions

- 3.2.1 **Significant positive effects** are predicted under the equalities, community, and wellbeing, economy and employment and housing IIA topics. With regard to equalities, community, and wellbeing, this is because the spatial strategy distributes growth relatively evenly across the borough, which means that the most deprived areas of Hounslow should benefit from growth. In addition, the policy framework seeks to protect existing, and deliver new, community facilities. With regard to economy and employment, this is because it delivers new employment sites, which will support new jobs and boost the local economy. In addition, the policy framework supports the enhancement of town centres across the borough, which will help increase footfall and spending locally. With regard to housing, this is because the spatial strategy meets the identified housing need of the borough, whilst the policy framework seeks to deliver a suitable mix of housing, including provision for affordable housing and specialist housing for older persons.
- 3.2.2 **Minor positive effects** are predicted under the biodiversity and green infrastructure IIA topic. This is because the spatial strategy focuses on the development of previously developed land and largely directs development away from the vicinity of internationally, nationally and locally designated

---

<sup>5</sup> Environmental Assessment of Plans and Programmes Regulations 2004

sites for biodiversity. This is strengthened by the policy framework, which seeks to protect and enhance both biodiversity and the green infrastructure network identified across the borough.

- 3.2.3 **Minor negative effects** are predicted under the soil contamination and sustainable land use IIA topic. Whilst the majority of site allocations made within the draft Local Plan are on previously developed land, some Green Belt and/or greenfield land has been allocated for development. However, it is recognised that this is largely unavoidable to meet the identified employment, minerals and housing needs of the borough as Hounslow is largely built-up. In addition, the policy framework appropriately addresses soil contamination and seeks to mitigate this where possible.
- 3.2.4 **Neutral to minor positive effects** are considered likely with regard to air quality, which falls under the air quality and noise IIA topic. This is because the air quality mitigation requirements and measures in the proposed policies, which include requirements for development to be at least air quality neutral (and air quality positive in the case of strategic developments), alongside planned new public transport infrastructure and the continued uptake of electric vehicles will collectively help the borough maintain or improve air quality over the plan period. The HLP is considered most likely to lead to neutral effects with regard to noise.
- 3.2.5 Broadly **neutral effects** are considered likely under the climate change and water quality and water resources IIA topics. With regard to climate change, whilst growth in the borough will ultimately lead to an increase in GHG emissions, this is largely unavoidable and when considering the global scale of climate change, relatively insignificant. Moreover, the policy framework seeks to ensure that future development is net zero carbon in operation and is resilient to the impacts of climate change, such as increasing flooding. In addition, the spatial strategy sufficiently avoids the areas of the borough at greatest risk of flooding. With regard to water quality and water resources, this is because, whilst development may increase strain on water resources, water quality is largely driven by water companies and national policy. Nevertheless, it is recognised that the policy framework seeks to protect local waterbodies by protecting and enhancing the Blue Ribbon Network.
- 3.2.6 **Uncertainty** is noted under the cultural heritage and landscape IIA topic. This is because it is difficult to predict effects with regard to the draft Local Plan as impacts on cultural heritage and landscape are largely dependent on the design and layout of development, which is unknown at this stage. Nevertheless, it is recognised that the policy framework seeks to mitigate adverse impacts on heritage assets and landscape character as a result of development.

### 3.3 Cumulative effects

- 3.3.1 Cumulative effects occur from the combined impacts of policies and proposals on specific areas or sensitive receptors. In the context of the IIA, cumulative effects can arise as a result of the in-combination and synergistic effects of a plan's policies and proposals.
- 3.3.2 Cumulative effects can also result from the combined impacts of a plan with impacts of another plan, or the 'inter-plan' effects. These can affect the

same receptor, resulting in in-combination or synergistic effects. The HLP therefore has the potential to combine with other planned or on-going activities in the vicinity of the borough to result in cumulative effects.

3.3.3 Whilst the geographic scope of the HLP only addresses the area covered by Hounslow, the in-combination effects of new development proposed through the plans for the Local Planning Authorities adjoining or in close proximity to the borough have the potential to lead to cumulative effects. This includes relating to adopted or emerging Local Plan documents for:

- Ealing;
- Hammersmith and Fulham.
- Hillingdon;
- Richmond upon Thames (particularly with regard to the Royal Botanical Gardens, Kew WHS); and
- Spelthorne

3.3.4 In addition, whilst the HLP is being prepared to be in conformity with the published London Plan (2021), the London Plan takes forward a range of proposals in the wider area which have the potential to lead to cumulative effects. Other plans in London, including the Mayor's Transport Strategy, also have the potential to take forward proposals which may lead to cumulative effects.

3.3.5 Furthermore, the combination of HLP proposals and other proposals and activities being taken forward in the wider area has the potential to lead to cumulative effects. Examples include:

- Potential future expansion of Heathrow Airport;<sup>6</sup>
- Proposals associated with Opportunity Areas in the wider area, including, for example, the part of the Heathrow Opportunity Area in Hillingdon, the Hayes Opportunity Area and the Southall Opportunity Area; and
- Proposed transport schemes, such as linked to the Elizabeth Line, HS2 and London Overground enhancements.

3.3.6 In this context, potential effects (both positive and negative) which may occur as a result of the in-combination effects of the HLP and other plans and proposals in the area include the following:

- Increases in traffic flows and congestion from the in-combination effects of development and, with potential impacts on air and noise quality and townscape character.
- Cumulative impacts on ecological networks. This includes from the in-combination effects of new development and associated infrastructure on habitats and biodiversity corridors. However, enhancements to green

---

<sup>6</sup> It should be noted that this is currently uncertain. In February 2020, the Court of Appeal ruled the decision to allow the expansion of Heathrow Airport was unlawful because it did not take climate commitments into account. The ruling suggested that in future, a third runway could go ahead if it is demonstrated that it aligns with the UK's climate policy. The Supreme Court subsequently overturned this decision on 16/12/20. However COVID19 related issues ultimately led to the Third Runway proposals being left in abeyance.

infrastructure provision facilitated through the new London Plan, Local Plan proposals and green and blue infrastructure enhancement projects in the area (including associated with the London Environment Strategy) have significant potential to support local, and sub-regional ecological networks.

- Impacts on employment land demand from the in-combination effects of the HLP and other Local Plan documents in the sub-region delivering significant employment land.
- Impacts on flood risk from the in-combination effects of new development, including relating to surface water and fluvial flooding. However, the provisions of the NPPF and measures and policy approaches implemented through the relevant plans and proposals will limit the significance of effects.
- Improvements to accessibility resulting from the in-combination effects of enhancements to public transport and walking and cycling networks.

3.3.7 As highlighted above, for many potential cumulative effects, the policy approaches proposed by the HLP will help reduce the significance of these in-combination impacts. However, monitoring for the various Local Plans will be a key means of ensuring that unforeseen adverse environmental effects are highlighted, and remedial action can be taken where adverse environmental effects arise, where possible.

## 3.4 Recommendations

3.4.1 Whilst no specific recommendations are made at this stage, it is recognised that there is a need for careful monitoring to ensure that development is delivered in line with the policy framework and objectives of the plan.

## 4. Next steps and monitoring

### 4.1 Next steps

- 4.1.1 The IIA Report and this NTS accompanies the Regulation 19 consultation version of the HLP for subsequent examination. At examination, the Inspector will consider representations (alongside the IIA Report) before then either reporting back on the soundness of the HLP or identifying the need for modifications. If the Inspector identifies the need for modifications to the plan these will be prepared (and undergo IIA) and then be subject to consultation (with an IIA Report Addendum published alongside).
- 4.1.2 Once found to be ‘sound’, the HLP will be formally adopted by the London Borough of Hounslow. At the time of Adoption, an IIA ‘Statement’ must also be published.

### 4.2 Monitoring

- 4.2.1 The table below outlines suggestions for a monitoring programme which will be refined and finalised in the IIA Statement when the HLP is adopted. The purpose of monitoring is to measure the significant sustainability effects of a plan, as well as to measure success against the plan’s objectives. It is therefore beneficial if the monitoring strategy builds on monitoring systems which are already in place. To this end, the indicators of progress chosen for the IIA require data that is already being routinely collected at a borough level by the London Borough of Hounslow and its partner organisations, or whose collection is already planned.

**Table 4.1: Proposed monitoring programme for the HLP**

Focus of monitoring	Indicator	Data source	Suggested frequency
Air quality	<ul style="list-style-type: none"> <li>Concentrations of NO<sub>2</sub> and PM<sub>10</sub> at monitoring locations</li> <li>Number of days exceeding air quality objectives for NO<sub>2</sub> and PM<sub>10</sub></li> </ul>	LB Hounslow	Daily/ annual
Effect of housing, employment and infrastructure on greenhouse gas emissions.	<ul style="list-style-type: none"> <li>Percentage of new developments meeting net zero carbon standards as defined in Policy SI2 of the London Plan</li> </ul>	LB Hounslow	Annual
Local and strategic green infrastructure provision	<ul style="list-style-type: none"> <li>Developments granted planning permission for new green infrastructure assets.</li> <li>Planning applications granted for loss of TPO trees without replacement.</li> <li>Compensatory measures delivered.</li> </ul>	LB Hounslow	Annual

Focus of monitoring	Indicator	Data source	Suggested frequency
Population and distribution of key biodiversity species	<ul style="list-style-type: none"> <li>• Area, condition, and connectivity of target priority habitats.</li> <li>• Population and distribution of priority species.</li> <li>• Developments granted planning permission within designated wildlife sites or Biodiversity Action Plan Priority Habitats.</li> <li>• Compensatory measures delivered.</li> </ul>	LB Hounslow	Annual
Flood risk	<ul style="list-style-type: none"> <li>• Developments granted planning permission contrary to the advice of the Environment Agency in Flood Risk Zones 2 and 3</li> </ul>	LB Hounslow	Annual
Equalities	<ul style="list-style-type: none"> <li>• Developments granted planning permission for new community infrastructure</li> <li>• Changes in deprivation domains and overall Indices of Multiple Deprivation</li> </ul>	LB Hounslow	Annual
Affordable housing delivery	<ul style="list-style-type: none"> <li>• Number of affordable dwellings completed (net), broken down by tenure and type of site.</li> </ul>	LB Hounslow	Annual

