

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

IIA Report (accompanying Regulation 19 consultation)

London Borough of Hounslow

August 2024

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Prepared by	Checked by	Verified by	Approved by
EH: Environmental Planner CB: Principal Environmental Planner	NCB: Technical Director	IM: Associate Director	IM: Associate Director

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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

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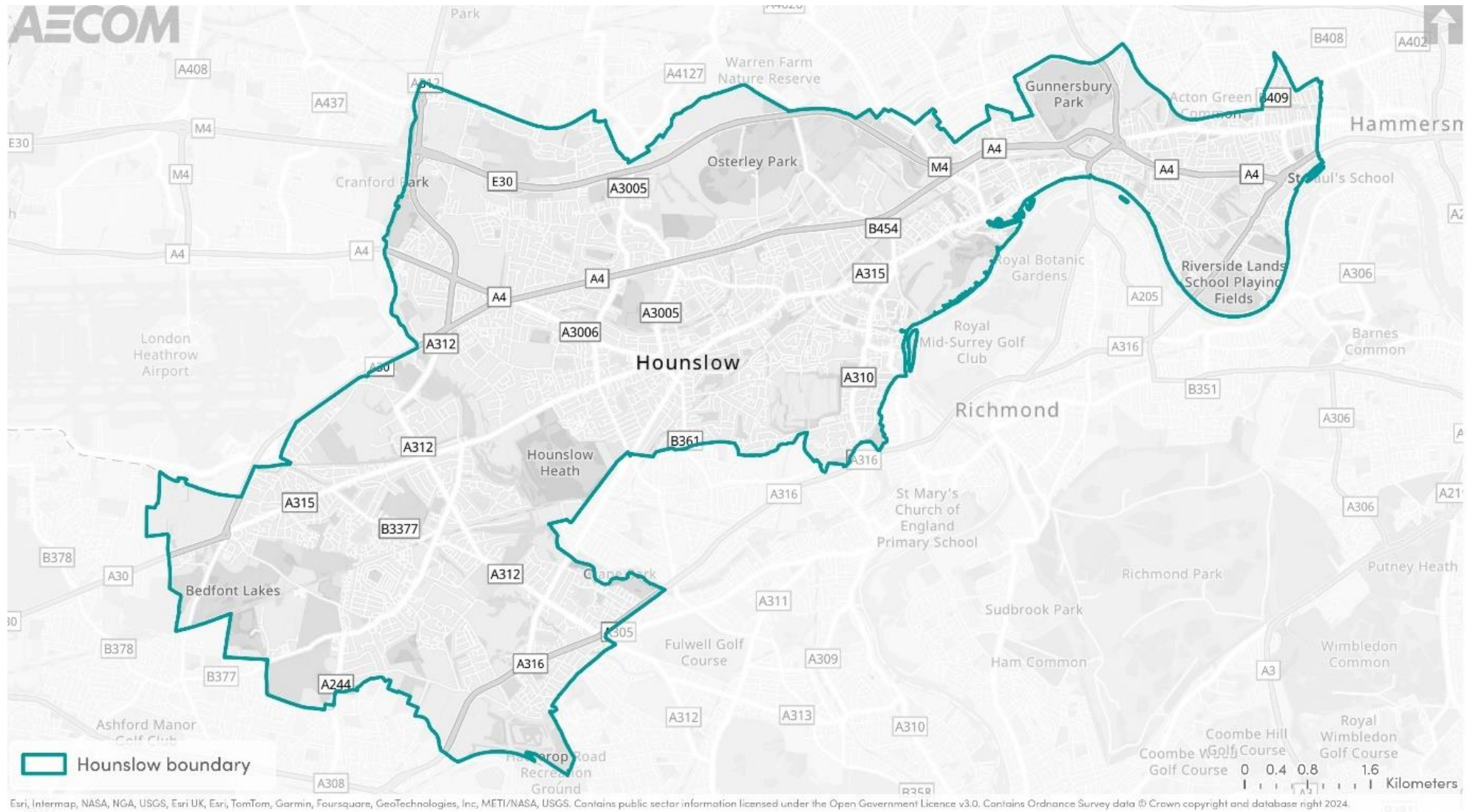
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Appendix A – Regulatory requirements

IIA Technical Annex (separate document)

IIA site assessments

Figure 1.1: The London Borough of Hounslow



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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.
- 1.1.2. Work on the Local Plan Review commenced following the adoption of the Local Plan in September 2015. As part of the Local Plan Review, IIA work to date has focused predominantly on the West of the Borough and Great West Corridor Development Plan Documents (DPDs), which were focused growth strategies required by the Planning Inspectorate after an independent review of the Local Plan in 2015. These DPDs were progressed and submitted for examination in December 2020, but in late 2022 the Inspectors examining the plans raised some potential procedural and legal issues which could cause significant delays. At this point, the most effective way for the Council to progress the Local Plan Review was to withdraw the plan documents from examination with a view to consolidating the work to date in a comprehensive borough-wide plan – the emerging HLP.
- 1.1.3. Recognising that the London Plan was also finalised and published in 2021, the comprehensive HLP takes account of the Mayor of London's directions for growth in the borough.
- 1.1.4. It is anticipated that the HLP will undergo examination in 2025.

1.2. IIA explained

- 1.2.1. IIA fulfils the requirements for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)¹ and discharges the duties for Equalities Impact Assessment (EqIA)² and Health Impact Assessment (HIA)³. A Habitats Regulations Assessment (HRA) is also being undertaken for the LPR, the findings of which have been reported separately from, but will inform, the IIA.
- 1.2.2. 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 LPR seeks to maximise the plan's contribution to sustainable development and the quality of life of residents.

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

² 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.

³ 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.

1.3. This IIA Report

- 1.3.1. It is a requirement that the IIA process is undertaken in line with the Environmental Assessment of Plans and Programmes Regulations 2004, ‘the SEA Regulations’.
- 1.3.2. 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*”.⁴ The report must then be considered when finalising the plan.
- 1.3.3. This report is the IIA Report for the HLP. 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.
- 1.3.4. The report has been structured in three ‘parts’ to address the key requirements stipulated by the SEA Regulations by answering the following three questions:
1. What has plan-making/ IIA involved up to this point? (including in relation to ‘reasonable alternatives’)
 2. What are the IIA findings at this stage? (i.e., in relation to the current draft plan).
 3. What happens next?
- 1.3.5. The report answers the three questions outlined above in turn, as discrete ‘parts’ of the report.⁵

1.4. Hounslow Local Plan vision and objectives

- 1.4.1. The HLP takes forward the vision for the borough set out in Opportunity Hounslow.⁶ 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.
- 1.4.2. 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.
- 1.4.3. 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

⁴ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

⁵ See **Appendix A** for further explanation of the regulatory basis for answering certain questions within the Environmental Report, and a ‘checklist’ explaining more precisely the regulatory basis for presenting certain information.

⁶ [Opportunity Hounslow](#)

- 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

Part 1: What has plan-making/ IIA involved up to this point?

2. The Scope of the IIA

2.1. Scope of the IIA

- 2.1.1. The SEA Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England, and Natural England.
- 2.1.2. These authorities were consulted on the scope of the IIA in July 2016, when the Council consulted on a Scoping Report for the LPR. The Scoping Report set out a review of the sustainability context and baseline for the IIA. Drawing on this review, it subsequently identified a range of sustainability problems / issues that should be a particular focus of IIA, ensuring it remains targeted at the most important sustainability issues. These issues were then translated into an IIA ‘framework’ of objectives and appraisal questions. The IIA Framework provides a way in which the sustainability effects of the Local Plan and alternatives can be identified and analysed based on a structured and consistent approach.
- 2.1.3. Given the timeframe which elapsed between the release of the Scoping Report for the Local Plan and the current IIA process and emerging HLP, the Council viewed it appropriate to revisit the scope for the IIA in 2023. On this basis, an IIA Scoping Paper was consulted upon in October 2023. The IIA Scoping Paper reviewed the evidence base for the IIA with a focus on the key changes to the policy context and baseline which have taken place in the interim.
- 2.1.4. A summary of the IIA framework (identifying the IIA themes and objectives that are a focus of the assessment) is presented in **Table 1.1**.

Table 1.1: 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.
	Improve the health and wellbeing of the population.
	Reduce crime and the fear of crime.

IIA theme	IIA objective
Equalities, community, and wellbeing	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
	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.

2.1.5. The key issues that underpin these objectives are detailed below.

Air quality and noise:

- The entire borough is designated as an AQMA due to levels of NO₂.
- Road transport is the major source of NO₂ emissions.
- In some locations noise levels are particularly high as a result of the presence of Heathrow Airport. The A4 and M4 are also key contributors to noise issues present locally.
- Green infrastructure is a key moderator of air and noise pollution in the borough.

Biodiversity and green infrastructure:

- A range of important habitats and species are present in the borough.
- The borough contains a number of sites nationally and locally designated for their importance to biodiversity.
- The waterways of the borough act as important components of regional ecological networks.
- A number of designated sites, including SSSIs and SINCs, have the potential to be further improved for their biodiversity value.
- There are large quantities of open space in many parts of the borough, much of which is of a multi-functional nature.
- Areas of brownfield land in the borough are of importance to biodiversity.

- There are significant opportunities for biodiversity enhancements in the borough.
- There are significant opportunities for enhancements to green and blue infrastructure networks across the borough, and improve linkages with neighbouring boroughs.

Climate change:

- A Climate Emergency was declared by the London Borough of Hounslow in June 2019.
- Despite recent falls, CO₂ emissions per capita in the borough remain above regional levels.
- Emissions from transport have seen some recent increases.
- Average domestic gas and electricity consumption per customer in the borough is high compared to regional averages.
- Some areas of the borough are poorly served by public transport, particularly in the west and out of centre.
- Hounslow is at risk of flooding from multiple sources including tidal (caused by surges in the Thames Estuary), fluvial (from other rivers, such as the rivers Brent and Crane) and surface water, sewers, and groundwater. Significant flooding took place across the borough in July 2021.
- As highlighted by the SFRA and LFRMS, future developments and climate change are the two key factors that are increasing the risk of flooding events in the borough.

Equalities, community, and wellbeing:

- The population of the borough has been rising and is projected to continue to do so in future.
- Older people are expected to become an increasingly large proportion of the population.
- There are significant pockets of deprivation in the borough. The West of Borough suffers from notable areas of persistent deprivation compared with other parts of the borough.
- The life expectancy of the wider borough residents has been rising, but health inequalities persist.
- Obesity is a concern, particularly amongst children.
- There are low levels of physical activity amongst residents.
- There are rising numbers of students in the borough which will need to be accommodated within the catchment area.
- Educational attainment is mixed, as the borough has a regionally high proportion of residents with higher qualifications and no qualifications.
- Rates of crime in the borough have declined over the past ten years.

Cultural heritage and landscape:

- The borough has a rich and diverse historic environment.
- Numerous features are nationally designated for their historic environment interest.
- Numerous undesignated features are of local importance of the historic environment.
- A number of heritage assets have been established at being 'at risk'.
- There are a range of landscape character types across the borough.
- The borough has 28 conservation areas. Each of these has up-to date conservation area appraisals which can provide an important contributor to defining the design and layout of development.
- Inappropriate development in the Great West Corridor has significant potential to have impacts on the setting of key heritage assets in the wider area. This includes the internationally designated Kew Gardens World Heritage Site, the Grade II* Registered Park and Garden of Gunnersbury Park, a significant number of listed buildings (including the Grade I listed Chiswick House), conservation areas and key views from the River Thames corridor.

Economy and employment:

- The COVID-19 pandemic has changed the economic roles of town and local centres in the borough. This includes an increase in vacancy rates.
- Traditional industry has declined, with a move to service sector opportunities.
- The economy of parts of the West of Borough is dominated by Heathrow.
- The majority of businesses in the West of Borough are small and young, with strong local supply chains.
- There is significant demand for workspace for start-ups and SMEs in parts of the borough (including in the Great West Corridor). However, the existing office space for these businesses is frequently unsuited for their purposes.
- There are significant vacancies in the office stock and the underuse of some of the buildings has led to inappropriate conversion of office to residential use through permitted rights. Borough residents are more likely to work in lower order occupations, with higher level workers employed from outside the borough.
- Household incomes are slightly lower than the London average.

Housing:

- There is strong demand for housing, with the number of households in the wider borough increasing at a faster rate than the population.
- Property prices in the borough are well above the national average, but below the average for London.
- Overcrowding is a concern in the borough, with dwellings generally smaller than average.

- There is a relatively small amount of social housing in the borough, high waiting lists, and increasing need.
- There are high levels of affordable housing need in the borough, particularly to the west and in central Hounslow.
- BME groups are proportionately more likely to be in housing need.
- The West of Borough provides a large proportion of London's Gypsy, Traveller and Travelling Showpeople accommodation needs.

Soil contamination and sustainable land use:

- The borough's industrial past has led to significant areas of land requiring remediation.
- A large proportion of recent new housing in the borough has taken place on brownfield land.

Water quality and water resources:

- The borough is in an area considered to be considerably water stressed.
- Rates of water consumption need to fall if 2030 targets are to be met.
- Water quality is important to the borough's biodiversity.
- Only one of the borough's watercourses is in good ecological condition.
- Climate change is likely to increase water stresses regionally and impact on both the frequency and the severity of flood events.

3. Approach to alternatives assessment

3.1. Introduction

- 3.1.1. 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.
- 3.1.2. The regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the SEA Environmental Report (an integral element of this integrated assessment) should present an appraisal of the “*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*”.⁷
- 3.1.3. This part of the IIA Report therefore describes 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.
- 3.1.4. The part of the report is structured as follows:
- **Chapter 3** establishes the options for assessment based on the latest evidence underpinning the plan.
 - **Chapter 4** presents a summary of the appraisal of the various options established in Chapter 3.
 - **Chapter 5** provides the Council’s reasoning behind the preferred approach for the HLP.

⁷ Environmental Assessment of Plan and Programmes Regulations 2004.

4. Establishing reasonable alternatives

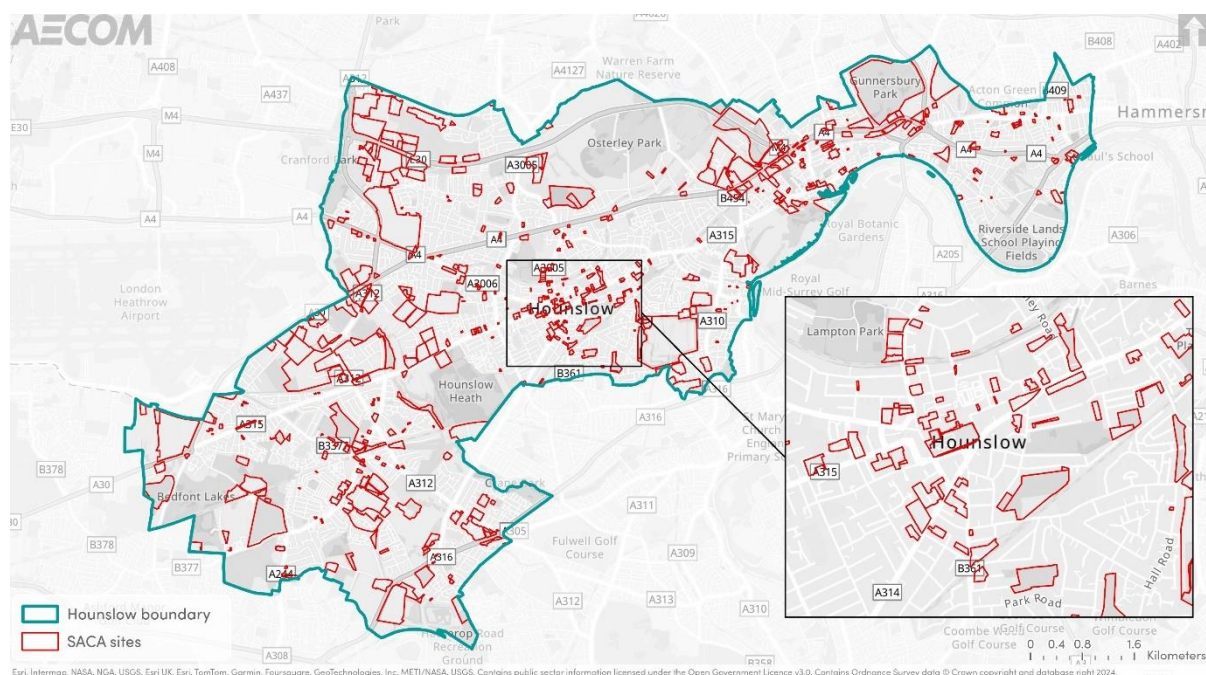
4.1. Background

4.1.1. Working with the Council, options were explored around the following themes: sites for potential growth; 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). Wider thematic policies will be explored further in subsequent sections of the IIA (Chapter 6 onwards).

4.2. Site options

- 4.2.1. A range of potential sites for allocation in the LPR were previously identified by the Council from a range of sources (including Strategic Housing Land Availability Assessment work undertaken by the GLA for the London Plan, various Call for Sites exercises, planning application data, previous plan allocations, and a review of land in council ownership).
- 4.2.2. In early 2019, a Site Allocations and Capacity Assessment (SACA) of the identified sites was undertaken by the Council to update and review capacity across the borough. The sites were tested to ensure they are available, suitable, and (in the case of short-term sites) deliverable over the plan period.
- 4.2.3. To support these considerations, all sites were also previously appraised as part of the IIA processes for the West of the Borough and the Great West Corridor Local Plan documents. This appraisal sought to evaluate the constraints and opportunities on each site based on a set of consistent criteria developed specifically for the IIA process. Based on these criteria, a 'red/ amber/ green' (RAG) rating was then applied to each site for each criterion to provide an indication of the relative sustainability merits of the sites.
- 4.2.4. In the period since, new sites have been identified and assessed through an updated SACA, with amendments made to sites to reflect the latest evidence in terms of availability, planning permissions, and whether approved schemes have undergone construction.
- 4.2.5. An updated 'long-list' of sites has therefore been identified (see **Figure 4.1**), with all sites again subject to IIA appraisal using up to date baseline information.
- 4.2.6. The outcomes of this assessment are provided in **a separate technical annexe**. The technical annexe provides the methodology for the assessment and proforma outputs for each site. This analysis has been used to inform the site selection process as well as subsequent IIA appraisals.

Figure 4.1: 'Long-list' of site options



4.3. Housing growth options

- 4.3.1. Housing growth options were originally explored through the IIA Reports for the West of the Borough and Great West Corridor Development Plan Documents (2020). These options focused on defined locations and explored options for the level of growth in these areas.
- 4.3.2. Housing growth options were then subsequently appraised as part of the IIA Report Addendum (Sept 2022). These options explored different growth levels over the plan period, informed by the parameters of the adopted London Plan (2021) and NPPF.
- 4.3.3. Housing growth options have now been revisited and explored on a borough-wide basis, consolidating earlier work undertaken for the Local Plan Review. At this stage, and in the context of a single consolidated Local Plan, the options being explored seek to identify how different levels of growth could be met with the land available for development over the plan period 2020 to 2041.
- 4.3.4. Five options have been identified for appraisal as follows.

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).

- 4.3.5. This option would deliver the most homes over the plan period. The spatial implications for this higher level of growth would likely be:
 - Higher levels of brownfield intensification at existing Opportunity Areas.⁸

⁸ Opportunity Areas are defined by the adopted London Plan (2021) and include both the Great West Corridor and Heathrow. Just north of the Borough, Opportunity Areas are also identified at Southall and Hayes.

- Higher levels of densification in town centres and around key transport nodes.
 - Densification in other more ‘suburban’ locations.
 - Extensive release of Green Belt land for housing development.
 - Less mixed-use development/ land identified to meet employment needs.
- 4.3.6. At this level of housing growth, it is considered unlikely that the identified employment land needs for the plan period could be met alongside given the land requirement for housing.

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).

- 4.3.7. This option also seeks to deliver a high level of growth. The spatial implications are considered similar to those outlined under Option H1, but under this option the following would apply:
- It is more likely that identified employment land needs could be met, including important warehousing and logistics uses.
 - Less Green Belt land release for housing development would be required.

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).

- 4.3.8. Under this option, brownfield intensification would be expected at existing Opportunity Areas, alongside densification in town centres and around key transport nodes. Employment land needs would be met through both mixed-use development and Green Belt land releases. Green Belt land release would be limited to land for employment development only.

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).

- 4.3.9. Option H4 explores a strategy that excludes any Green Belt land adjustments through the local plan process. The implications for this approach include either significant shortfalls against identified employment land needs, or reduced housing delivery elsewhere in the borough to compensate for higher levels of mixed-use development/ employment development outside of the Green Belt.

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).

- 4.3.10. Under this option, housing delivery over the remainder of the plan period (2029-2041) would not be plan-led or would be reliant on a further Local Plan Review within five years of adoption.

4.4. Employment growth options

- 4.4.1. Employment growth options were explored through the IIA Reports for the West of the Borough and Great West Corridor (2020). These options explored the level of employment growth.
- 4.4.2. Employment growth options are being revisited in the context of a consolidated HLP, the adopted London Plan, and an updated Employment Land Review.
- 4.4.3. Five options have been identified for appraisal which identify the combined industrial and office floorspace requirement over the plan period, allowing for completions and permissions:

Option E1: The Local Plan seeks to deliver the full requirement for additional employment land (identified as being 664,907 (gross) m2 in the Employment Land Review Update), including through the release of Green Belt land.

- 4.4.4. The option would seek to meet a higher level of employment land need. From a spatial perspective, the option would include more Green Belt land releases for employment land, intensification of existing sites, and more employment development on brownfield sites (thus reducing land for housing).

Option E2: The Local Plan seeks to deliver the full requirement for additional employment land (identified as being 664,907 m2 (gross) in the ELR Update), whilst avoiding any releases of Green Belt land.

- 4.4.5. Under this option there would be no release of land from the Green Belt and delivery of additional employment land would instead rely on a very significant intensification of existing employment sites, including town centres. It would also involve allocating more employment floorspace on brownfield sites, including through the utilisation of a significant number of potential housing allocations for employment uses.

Option E3: The Local Plan seeks to optimise the delivery of new employment land (providing approximately 556,600 m2 (gross) of floorspace⁹) including through the release of Green Belt land.

- 4.4.6. This option would include delivery of land through an intensification of existing sites utilising a design-led approach, co-location of employment and housing development where suitable, and through limited release of Green Belt land (close to Heathrow). The option will not deliver the forecasted employment land needs for the plan period in full. There would also be less need for new employment on brownfield sites (i.e. more land available for housing).

Option E4: The Local Plan seeks to optimise the delivery of new employment land (providing approximately 426,270 m2 (gross) of floorspace¹⁰) but avoids any release of Green Belt land.

⁹ Net figure of 262,000m2

¹⁰ Net figure of 155,238m2

- 4.4.7. Under this option, there would be no release of Green Belt land and the Local Plan would instead rely on the significant intensification of existing employment sites and allocating more employment floorspace on brownfield sites, including using some proposed housing allocations for employment uses. The options will not deliver the forecasted employment land needs for the plan period in full.
- 4.4.8. Under this option needs are confined to the existing employment sites with significant intensification. This includes through significant co-location and use of 'stacking', located closer to/within existing settlements. It would also lead to more employment development on brownfield sites (thus further reducing land for housing)

Option E5: Hounslow does not allocate any land for employment development purposes (a 'do nothing' scenario).

- 4.4.9. This option would not seek to allocate any land for employment development.
- 4.4.10. This is relevant to test where a similar housing option was not as, given the lack of a London Plan employment target, there is less strategic steer for the Local Plan concerning employment land.

4.5. Options relating to tall buildings

- 4.5.1. In line with the London Plan there is a need to identify appropriate locations for tall buildings as well as define tall buildings in the context of the borough.
- 4.5.2. The IIA has considered options for tall buildings in the context of the delivery of a single consolidated Local Plan, the adopted London Plan and the further evidence that has arisen from a new Tall Buildings Study undertaken by the London Borough of Hounslow.¹¹ This study recognises that to date, the GWC has been more rigorously tested than other areas of the borough, and as such it seeks to explore alternative locations across the borough to a similar level of scrutiny.
- 4.5.3. Three options have therefore been identified for appraisal relating to the tall buildings issue:
- **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 the 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.**

¹¹ LBH (2024) Tall Buildings Study

4.6. Transport options

4.6.1. A number of proposed rail schemes have the potential to improve accessibility in the borough. The schemes are at different stages of development and include the following three proposals:

- **West London Orbital:** The scheme comprises an extension of the Overground line from Acton to Hounslow, the route of which would go via Chiswick and GWC. The scheme has the potential to unlock significant growth, and to date station design, level crossings and other initial development work has taken place. A report setting out the next stage of development work is due in 2024.
- **Brentford-Southall rail link:** The scheme involves the reuse of the existing freight line from Southall. The scheme would provide an important transport link to the Great West Corridor, acting as a passenger shuttle service to connect the area to the Elizabeth line with a new station along the Golden Mile.
- **Southern rail access route to Heathrow:** The scheme would comprise a new link to Heathrow via a new station at Bedfont. This would comprise an alternative to a new link proposed to Heathrow Airport via Spelthorne and Staines. Given the various alignment options still being considered by DfT and the fact that this scheme is still in the early stages of development, there remains a degree of uncertainty around whether this could be delivered within the plan period.

4.6.2. Recognising the opportunities provided by these proposals for enhancing accessibility in the borough and unlocking growth. three options have been identified for appraisal. These are as follows:

- **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.**

5. Assessing reasonable alternatives

5.1. Methodology

- 5.1.1. 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.
- 5.1.2. 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 preferred from an SA perspective with '1' being the highest ranking. '=' has been used to highlight where options perform equally or cannot be differentiated between.

5.2. Housing growth options assessment

- 5.2.1. Five options have been identified for appraisal:
- **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).

IIA theme	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	4	3	2	1	5

5.2.2. The options propose varying levels of planned housing delivery over the period 2020 to 2041 and the higher the level of growth, the greater the road traffic impacts are considered likely to be (with associated impacts for both air quality and noise). This is reflected in the ranking of the options, making the lowest growth option rank most favourably. This is with the exception of Option H5, which plans for growth in the early plan period only and could see unplanned development emerge in the latter part of the plan period. The option is therefore not reflective of the likely overall growth level and unplanned development over the latter part of the plan period could result in development in less accessible areas of the borough and is less likely to take a strategic approach to addressing air quality and noise impacts (which would be dealt with through the development management process). For this reason, Option H5 ranks last.

5.2.3. With the whole of Hounslow being a declared Air Quality Management Area (AQMA), the impacts for air quality could be of significance under any option. Development will need to carefully consider mitigation and the priorities of the Air Quality Action Plan (AQAP). In the latest AQAP (2023), the Council have identified twelve priorities for the borough which, of note, include: improving walking and cycling infrastructure, improving air quality at schools, regular car free days in high footfall areas, and the installation of Ultra-Low Emission Vehicle (ULEV) infrastructure.

5.2.4. Whilst a lower level of growth could be considered to have better potential to mitigate effects (with effects of a lesser degree), it is also recognised that larger-scale growth (supported by large-scale strategic growth options) also provide good opportunities (by economies of scale) for strategic interventions that improve air quality and noise. This includes active travel and sustainable transport enhancements.

5.2.5. It is expected that under any option (except Option H5), most growth will be directed towards the most accessible areas of the borough with measures delivered alongside to improve access to sustainable transport options, increase uptake of active travel opportunities, and ensure the necessary highways interventions are delivered to support growth.

5.2.6. As the level of growth increases, so too does the level of brownfield intensification and urban densification, and more Green Belt land release would be expected. The expansion of development into Green Belt land is likely to reduce air quality in these locations, and by nature these locations are more peripheral from the main centres (i.e., less accessible), which is a contributing reason as to why Options H1 and H2 are ranked lower. Higher levels of intensification and densification are considered more likely to reduce air quality impacts associated with transport, assuming that development areas are largely accessible areas with good public transport connections.

IIA theme	Outcomes	Option H1	Option H2	Option H3	Option H4	Option H5
Biodiversity and green infrastructure	Significant effect?	Yes - negative	Yes - negative	Uncertain	Uncertain	Uncertain
	Rank	5	4	2	1	3

- 5.2.7. The options propose varying levels of planned housing delivery over the period 2020 to 2041. The higher the level of growth, the greater the cumulative pressures for biodiversity are considered likely to be, including through increased recreational pressures at key designated sites and greater impacts on air quality and water resources (within and outside the borough). Policy mitigation may be required, and the impacts for key sites (European designated sites) is explored in greater detail through the Habitats Regulations Assessment (HRA) process.
- 5.2.8. The higher growth levels include expansion into the Green Belt where there are known biodiversity constraints relating to key biodiversity sites. Green Belt release is likely to be focused around the Heathrow Opportunity Area and is therefore likely to affect the extensive network of Sites of Importance for Nature Conservation (SINCs) and Local Nature Reserves present in these areas. Options H3, H4, and H5 avoid housing development within the Green Belt and (considered alongside a lower growth level) are thus more likely to avoid impacts arising at these sites. Avoiding development within the Green Belt will also retain existing countryside/ green infrastructure access for residents.
- 5.2.9. Higher levels of brownfield intensification and urban densification has the potential to reduce the available space for biodiversity and green infrastructure enhancements, and policy mitigation would be required to avoid impacts arising. Mandatory biodiversity net gain will ensure biodiversity enhancements are delivered in development, but onsite delivery will be an important consideration in the context outlined above.
- 5.2.10. Given these considerations, Option H1 followed by Option H2, which propose the highest growth levels and include housing development within the Green Belt, are considered to have greater potential for biodiversity impacts of significance and are ranked last accordingly.
- 5.2.11. The lower growth levels are considered to have increased potential to mitigate localised impacts and improve and extend the biodiversity and green infrastructure network. These options also have greater potential to avoid cumulative impacts of significance though this is uncertain at this stage until informed by further HRA work.
- 5.2.12. However, exception is made for Option H5, which only plans for development early in the plan period and is thus not reflective of the likely overall level of growth. The option could give way to unplanned development in the latter part of the plan period. Unplanned development is considered to less likely to bring forward strategic biodiversity improvements and impacts would need to be considered through the development management process. For these reasons, Option H5 ranks less favourably than Options H3 and H4. However, given Option H5 is still likely to avoid development within the Green Belt that would affect the network of habitats

here (with no adjustments being made through the local plan process), it still ranks marginally better than Options H1 and H2.

5.2.13. Option H4 is likely to result in slightly fewer homes being delivered than Option H3 and is therefore ranked marginally higher (as the best performing option overall).

IIA theme	Outcomes	Option H1	Option H2	Option H3	Option H4	Option H5
Climate change	Significant effect?	Yes - negative	Yes - negative	No	No	Yes - negative
	Rank	3	3	2	1	4

5.2.14. The options propose varying levels of planned housing delivery over the plan period, and higher levels of growth are considered for a range of implications.

5.2.15. With regard to adaptation, higher levels of growth (Options H1 and H2) have greater potential to extend into areas of existing or future flood risk and could increase the level of hard surfacing and impede drainage in this respect, increasing flood risk in the borough. The borough is at risk of flooding from multiple sources, including tidal (caused by surges in the Thames Estuary), fluvial, surface water, sewers, and groundwater. Sequential testing should assist in reducing this risk, in so far as prioritising lower risk areas for development, but policy mitigation is likely to be required alongside to reduce the potential for effects of significance; some uncertainty is noted in the absence of precise locations. Lower levels of growth informed by a capacity-led approach (Option H3 and H4) has greater potential to avoid negative effects of significance in this respect.

5.2.16. With regard to climate resilience, higher levels of growth could potentially have greater impacts for ecosystems by affecting habitats and green infrastructure, soil resources, and water resources to a greater degree. This is particularly an issue associated with housing development within the Green Belt (Options H1 and H2) given the loss of high-quality soil resources and green infrastructure in these locations. Green Belt development also has implications for climate change mitigation, given these areas are generally less accessible than town centres or transport nodes which would be a focus for alternative densification and intensification/ lower growth options (Options H3 and H4) and thus likely to lead to increased levels of emissions associated with transport.

5.2.17. Of note, Option H5 only plans for development in the early plan period, with the potential for speculative development in the latter part of the plan period. In this scenario the potential for negative effects is considered greater given the increased need for strategic planning in the context of a climate emergency. For this reason, the option ranks last.

5.2.18. Given the climate priorities for the next couple of decades, Options H1, H2, and H5 are considered to do less to support the required actions to increase climate resilience and are thus ranked least favourably.

5.2.19. With regard to Option H3 and H4, both are considered to have greater potential to support climate objectives and avoid significant effects arising, by utilising a capacity-led approach to inform the overall level of growth and

locating most development in accessible urban areas of the borough. Option H4 is considered to rank best given it entirely avoids development within the Green Belt supporting the retention of areas of land with the potential to support the resilience of the borough to the effects of climate change and facilitate carbon sequestration in these locations.

IIA theme	Outcomes	Option H1	Option H2	Option H3	Option H4	Option H5
Equalities, community, and wellbeing	Significant effect?	Yes - positive	Yes - positive	Yes - positive	Yes - positive	No
	Rank	4	3	1	2	5

- 5.2.20. The options propose varying levels of planned housing delivery over the plan period. The delivery of new housing is likely to positively affect communities and health and wellbeing, particularly through the delivery of a range of housing types and tenures, including affordable housing, which will contribute to reducing deprivation in certain areas. Medium and large-scale development sites also have good potential to integrate community benefits such as new green spaces, community services, and improvements to the public realm.
- 5.2.21. Options H1 and H2 would extend housing development into the Green Belt which has implications for communities. Notably, Green Belt land is generally less accessible than the main urban centres in the borough and development would reduce green infrastructure access to some degree for existing residents. Development would also reduce the current landscape gap between settlement areas.
- 5.2.22. Option H5 would only plan for development in the early part of the plan period and could result in speculative development in the latter part of the plan period. This could result in negative effects for local communities, as speculative development often leads to piecemeal development that delivers fewer community benefits. Overall effects are uncertain given they would largely be determined through the development management process.
- 5.2.23. Options H3 and H4 are likely to support community and wellbeing objectives given both options adopt a capacity-led approach to determining the overall level of growth. The options have greater potential to consider and deliver supporting community infrastructure alongside high-quality design and mixed-use development. Option H3 includes an element of employment development within the Green Belt, this is notably connected to the Heathrow Opportunity Area and likely to support communities with an increase in economic and employment opportunities in key sectors. For this reason, alongside a higher overall level of growth and housing delivery, Option H3 is considered to rank marginally better than Option H4. Both Options H3 and H4 are also considered to rank better than Options H1 and H2 given the options avoid less accessible housing development in the Green Belt and avoid the loss of green infrastructure and countryside access in these locations.

IIA theme	Outcomes	Option H1	Option H2	Option H3	Option H4	Option H5
Cultural heritage and landscape	Significant effect?	Yes – negative	Yes – negative	Uncertain	Uncertain	Yes – negative
	Rank	5	4	2	1	3

- 5.2.24. The options propose varying levels of planned housing delivery over the plan period, and the higher the level of growth, the greater the potential implications for cultural heritage and landscape/ townscape, by nature of more development, in more areas of the borough. This is reflected in the ranking of the options, except for Option H5. Option H5 only plans for development in the early part of the plan period and could lead to unplanned development in the latter part of the plan period. It is therefore not representative of the likely overall growth figure over the plan period but is considered likely to be lower growth than under Options H1 and H2 in the absence of Green Belt adjustments through the local plan process.
- 5.2.25. Options H1 and H2 would extend housing development into the Green Belt, which has implications for the countryside character of the landscape here and areas of historic significance. It is assumed that development could avoid areas of highest sensitivity, but this is uncertain in the absence of detailed locations and proposals. The cumulative impact of development within the Green Belt could also lead to significant effects.
- 5.2.26. Options H3 and H4 focus development within existing urban areas, prioritising urban intensification and densification. This has implications for sensitive heritage settings in settlements but given both options seek to adopt a design-led approach to determining site capacities and ultimately the overall level of growth, the options are considered to have greater potential to avoid significant effects arising. However, this remains uncertain in the absence of precise locations and detailed development proposals. With regard to townscape impacts, it is assumed that under a capacity-led approach, high-quality development can be delivered that contributes to townscape settings and public realm improvements.
- 5.2.27. Option H5 is also noted for the potential to affect townscape settings through speculative development in the latter part of the plan period, with speculative development often associated with piecemeal development that delivers less benefits than plan-led development (such as associated infrastructure development like green infrastructure and landscape buffers).

IIA theme	Outcomes	Option H1	Option H2	Option H3	Option H4	Option H5
Economy and employment	Significant effect?	Yes – negative	Yes – negative	Yes – positive	Uncertain	Yes – positive
	Rank	5	4	1	3	2

5.2.28. The options propose varying levels of planned housing growth over the plan period. Given the identified constraints to land supply, higher levels of growth may see housing development on land that would otherwise be allocated for employment purposes, and in this way, could undermine employment land delivery, leading to significant negative effects under Options H1 and H2, making these options rank least favourably accordingly.

5.2.29. Option H3 adopts a capacity-led approach, which is considered more likely to support economic growth and employment land needs, and lead to significant positive effects. By allowing limited employment development on Green Belt sites in the Heathrow Opportunity Area, the option also has increased potential to capitalise on the economic benefits associated with growth in this area, particularly for key sectors such as warehousing and distribution whose needs are more difficult to meet in the existing urban areas.

5.2.30. Option H4 seeks to avoid any development (housing or employment) within the Green Belt. With all development needs concentrated in the main built up areas of the borough under this option, it is unlikely that the required level of mixed-use development/ employment growth could be achieved.

5.2.31. By planning for a lower level of growth overall (over a shorter period), Option H5 could see more of the available sites given over to employment development needs, which is likely to be of benefit to this particular theme, but the option would be less likely to capitalise on strategic economic growth associated with the Heathrow Opportunity Area, making it rank less preferably than Option H3 overall.

IIA theme	Outcomes	Option H1	Option H2	Option H3	Option H4	Option H5
Housing	Significant effect?	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive
	Rank	1	2	3	4	5

5.2.32. The options propose varying levels of planned housing delivery over the plan period. Whilst significant positive effects are considered likely under all options in relation to this theme, the higher the planned housing delivery the more significant the effects are likely to be, and this is reflected in the ranking of the options.

5.2.33. This relates to the positive implications of higher levels of affordable housing being delivered, increased housing delivery across more areas of the borough meeting local needs and contributing to a reduction in deprivation, and the potential for a broader range of housing types, tenures, and sizes to be delivered.

5.2.34. Despite this, it is recognised that higher levels of growth may be more difficult to achieve given constraints to land supply, however, it is assumed

that higher density development will not be at a cost of/ a detriment to housing quality, and that high-quality design can still be embedded as a key consideration for future growth.

IIA theme	Outcomes	Option H1	Option H2	Option H3	Option H4	Option H5
Soil contamination and sustainable land use	Significant effect?	Yes - negative	Yes - negative	No	No	Yes-negative
	Rank	5	4	2	1	3

- 5.2.35. With regard to sustainable land use, Options H3 and H4 clearly perform better than the remaining options given their focus on urban intensification and densification, and avoidance of development within the Green Belt (maintaining the landscape gap between settlements). Under these options, most development would be in the urban centres and identified brownfield opportunity areas, promoting mixed-use development in these areas (except for Option H3 which also extends employment development into the Green Belt).
- 5.2.36. Options H1 and H2 both extend housing development into the Green Belt, promoting higher levels of greenfield development and reducing the space between settlement areas.
- 5.2.37. Option H5 only plans for growth 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 therefore not reflective of the likely overall level of growth and speculative development is likely to undermine the prioritisation of more sustainable areas for growth.
- 5.2.38. Furthermore, by likely including more greenfield land development, Options H1, H2, and H5 have greater potential to lead to soil contamination. On the other hand, the focus on brownfield intensification under Options H3 and H4 have greater potential to remediate any contaminated sites within the urban areas. It is considered likely that development in the Green Belt will not occur under Option H5 given that no adjustments would be made through the Local Plan process.
- 5.2.39. Cumulatively, the effects under Options H1, H2, and H5 are considered more likely to be of significance than the effects under Options H3 and H4. This is also reflected in the ranking of the options, and Option H4 ranks first given the exclusion of any development within the Green Belt.

IIA theme	Outcomes	Option H1	Option H2	Option H3	Option H4	Option H5
Water quality and water resources	Significant effect?	No	No	No	No	No
	Rank	5	4	2	1	3

5.2.40. The options differ by varying levels of growth and the greater the level of growth, the greater the anticipated effects for water resources and water quality are likely to be (as reflected in the ranking of options). This relates to more development placing greater pressure on water resources and more development areas potentially affecting water quality and drainage. Given that Hounslow is in an area considered to be relatively 'water stressed', higher growth levels have implications for water companies and resource planning, though effects are unlikely to be of significance (given the duty placed on water resource companies to provide for future growth and potential to plan for this growth).

5.2.41. With a greater focus on urban intensification and densification, Options H3 and H4 notably have good potential to remediate brownfield land in urban areas, to the benefit of water quality.

Table 4.1: Summary findings for the assessment of housing growth options

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
	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

Summary:

5.2.42. 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.

- 5.2.43. 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.
- 5.2.44. 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.

5.3. Employment growth options assessment

5.3.1. Five options have been identified for appraisal:

- **Option E1:** The Local Plan seeks to deliver the full requirement for additional employment land (identified as being 664,907 m² (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 m² (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 m² (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 m² (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).

IIA theme	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

5.3.2. The whole of Hounslow has been designated as an Air Quality Management Area (AQMA). Options E1 and E2, through taking forward higher levels of employment growth across the borough, have the potential to lead to additional air and noise quality impacts. This includes through increasing traffic flows from employment uses. Option E2 is considered to perform slightly more favourably than Option E1 as it will deliver an increased proportion of employment growth in town centres. This means that more residents will be able to access employment opportunities by public transport or methods of active travel. The remaining options are ranked according to the level of employment growth they seek to deliver, also considering the location of growth.

5.3.3. It is recognised that under any option, most growth will be directed towards the most accessible areas of the borough, with measures delivered alongside growth to improve access to sustainable transport options; increase uptake of active travel opportunities; and ensure the necessary highways interventions are delivered to support growth. However, taking a precautionary approach, the potential for negative effects of significance under all options is noted at this stage.

IIA theme	Outcomes	Option E1	Option E2	Option E3	Option E4	Option E5
Biodiversity and green infrastructure	Significant effect?	Yes – negative	No	No	No	No
	Rank	5	3	4	2	1

- 5.3.4. The additional level of employment growth proposed under Options E1 and E2 has the potential to lead to increased impacts on habitats and biodiversity networks. This is due to these options requiring additional levels of development, which may impact on the existing biodiversity resource of the borough.
- 5.3.5. The options which involve Green Belt release (Options E1 and E3) also have implications for biodiversity. Employment growth in the Green Belt is largely linked to the proximity of Heathrow as a key driver of economic growth. However, this area has significant biodiversity constraints associated with the extensive network of Sites of Importance for Nature Conservation (SINCs) and Local Nature Reserves. However, it is recognised that in line with the NPPF, compensatory improvements from Green Belt release sites to offset impacts would be required. Under Option E1, the higher levels of growth within the Green Belt would be more difficult to offset on fewer remaining parcels of Green Belt land, with the potential to lead to significant effects. Whereas Option E3, involving limited release of Green Belt land close to Heathrow, has greater potential to leverage improvements to the remaining Green Belt land through compensatory measures, including through habitat creation and enhancement. It is assumed that the Council would have a policy seeking to capture compensatory improvements from sites released via a Green Belt Review to improve the environmental quality and accessibility of remaining Green Belt land. By utilising a design-led approach, this option has the potential to reduce the impacts on biodiversity and deliver positive enhancements.
- 5.3.6. It is recognised that the options which promote development on previously developed land / the intensification of developed land (Options E2 and E4) also have implications for biodiversity. Whilst some brownfield sites are of little biodiversity value, others can hold significant biodiversity value. Intensification has the potential to reduce the space available for biodiversity, and whilst the requirement for biodiversity net gains in development will help to mitigate this, it will be important to ensure that net gains are delivered on-site (including on smaller sites) wherever possible.
- 5.3.7. Whilst Option E5, the ‘do nothing’ scenario, does not offer any opportunities to add biodiversity value, since it does not deliver any employment growth, it is the least likely to impact key features and areas of biodiversity interest and for this reason, the option ranks most favourably.
- 5.3.8. Ultimately, the significance of the effects from each option on features and areas of biodiversity interest largely depends on the location, scale and nature of development and the incorporation of biodiversity enhancement measures. Hence, the nature and significance of effects will be dependent on the compensatory measures secured from Green Belt release sites, the design and layout of new development; the integration of infrastructure which

supports ecological networks; and the extent to which biodiversity net gain (BNG) is incorporated onsite within new development areas.

5.3.9. Options E2 and E4 are considered to have increased potential to avoid significant effects arising (by avoiding development within the Green Belt) making these options rank more favourably than Options E1 and E3. With lower levels of intensification, Option E4 is considered to rank more favourably than Option E2 (by allowing more space onsite for delivery of biodiversity net gains). Options E1 and E3 rank less favourably given the development around Heathrow which would require compensatory measures, particularly under the higher growth level (Option E1) where significant negative effects are considered more likely with a reduced potential for effective offsetting measures.

IIA theme	Outcomes	Option E1	Option E2	Option E3	Option E4	Option E5
Climate change	Significant effect?	No	No	No	No	No
	Rank	4	2	3	2	1

5.3.10. Options E1 and E2, through taking forward higher levels of employment growth across the borough, have the potential to lead to an overall increase in greenhouse gas (GHG) emissions. This includes through increasing traffic flows from employment uses and increasing the built footprint of Hounslow.

5.3.11. Given the types of employment uses in demand, including distribution and warehousing in the Heathrow Opportunity Area, development under Option E1 could increase the use of Heavy Goods Vehicles (HGVs) in the borough and could involve extensive greenfield development/ Green Belt release. Greenfield development/ Green Belt release is expected to be more limited under Option E3 but is still likely to promote similar uses in this area.

5.3.12. However, it should be noted that the level of transformational change that would be required for Options E1 and E2 has the potential to support limitations in GHG emissions on a per capita basis in other sectors. This is given the potential for these options to improve the viability and deliverability of additional public transport and pedestrian / cycle infrastructure, and potentially for reducing the carbon intensity of new development.

5.3.13. In terms of climate change adaptation, Options E1-E4 offer opportunities for the delivery of new infrastructure, including green infrastructure provision, which will help the borough adapt to the likely impacts of climate change. Given the increased level of transformational change likely to be stimulated through Options E1 and E2, there may be further potential for the integration of significant new green and blue infrastructure within new employment growth areas. This could help increase the borough’s resilience to the likely impacts of climate change, including extreme weather events and the urban heat island effect. However, it is recognised that growth ultimately has the potential to increase impermeable surfaces borough-wide, particularly where it involves Green Belt release (Options E1 and E3) and contribute to the urban heat island effect (particularly through intensification which is likely to be most prominent under Option E2).

- 5.3.14. In relation to the fluvial flood risk present in the borough associated with the River Brent, Longford River and Crane River, the options are unlikely to lead to development within flood risk areas or development which increases the risk of flooding in these areas. This is in part due to the provisions of the NPPF and national policy, which will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented.
- 5.3.15. Overall, development within the Green Belt under Options E1 and E3 is considered more likely to promote more carbon-intensive uses such as distribution and warehousing (and to a greater extent under Option E1), but these remain accessible locations with proximity to the airport and strategic motorway network. Options E2 and E4 promote urban intensification which will likely see more employment development in the most accessible areas of the borough but with evidence suggesting a market preference for warehousing and logistics, this could see more of these uses coming forward on brownfield sites closer to town centres or through more intensive co-location on existing employment sites. As such, HGV movements may not necessarily decrease under these options, but could shift to more populated areas. By avoiding any further significant employment growth, Option E5 is ranked most favourably in relation to this IIA theme.
- 5.3.16. No significant effects are considered likely under any of the options due to the global nature of climate change, and the provisions of the NPPF and national policy with regard to flood risk.

IIA theme	Outcomes	Option E1	Option E2	Option E3	Option E4	Option E5
Equalities, community and wellbeing	Significant effect?	Yes – negative	Yes – negative	Yes – positive	Yes – negative	No
	Rank	4	5	1	3	2

- 5.3.17. Options E1 and E2 have implications for communities. Given the constraints to land supply in the borough, it is likely that delivering the level of employment growth required under these options would undermine housing delivery by significantly reducing the available space for housing provision. These options are therefore less likely to contribute to reducing deprivation and inequalities in the borough, with the potential for significant negative relating to this IIA theme effects. This is particularly true for Option E2 which has no opportunity to expand into the Green Belt, as reflected in the ranking of the options.
- 5.3.18. Development within the Green Belt (under Options E1 and E3) will likely promote increased delivery of distribution and warehousing development, which has implications for local communities in terms of heavy goods vehicles on local roads, and noisy, unsightly development that is not readily integrated and can impact upon the public realm. More limited growth in the Green Belt under Option E3 has better potential to limit these impacts whilst providing appropriate location for these sectors.
- 5.3.19. Option E3 also places emphasis on appropriate growth within the urban areas, supporting local communities with job opportunities in accessible locations. As Option E3 has the greater potential to deliver against the wider

range of development needs (including housing needs), this option is considered to have better potential to realise significant positive effects and contribute towards reducing inequalities and deprivation in the borough, making it rank most favourably.

5.3.20. Option E4 would focus all development within existing urban areas and at brownfield opportunities. Whilst this has the benefits of accessible development, it again has the potential to impact upon the housing delivery strategy and would intensify integrated employment development and co-location which could impact upon local communities. The potential for significant negative effects is also therefore recognised under this option. Conversely, as Option E5 does not deliver any employment growth, it is unlikely to make use of the significant economic opportunities locally and support communities with sustainable economic growth and accessible job opportunities. This option is therefore less likely to lead to benefits for those of working age, or support training and vocational opportunities, including for younger people or those who are socio-economically disadvantaged, and lead to minor negative effects in this respect.

IIA theme	Outcomes	Option E1	Option E2	Option E3	Option E4	Option E5
Cultural heritage and landscape	Significant effect?	Yes – negative	Yes - negative	Uncertain	Uncertain	No
	Rank	4	3	2	2	1

5.3.21. Options E1 and E2, through delivering an increased level of employment growth, have increased potential to impact on the fabric and setting of the historic environment and landscape and townscape character in Hounslow. Inappropriate development (including through intensification and densification) in particularly sensitive areas has the potential to lead to significant impacts on the settings of key heritage features and areas of interest, as well as views and vistas which contribute to landscape and townscape character.

5.3.22. It is recognised that higher density urban development (particularly under Options E2 and E4), including taller buildings, has the potential to lead to significant impacts on the settings of key heritage features and areas of interest, as well as views and vistas in sensitive townscapes, whilst Green Belt development would be likely to deliver more distribution and warehousing with implications for the landscape/townscape and sensitive heritage features in these locations. The options which involve Green Belt release (Options E1 and E3) are more likely to lead to impacts on the fabric and setting of the historic environment and landscape and townscape character in these areas. Whilst these options are less likely to lead to higher density development, the release of Green Belt land could have associated impacts on the historic environment and landscape and townscape character, including on key views and vistas (dependent on precise location). However, it is recognised that compensatory measures could avoid impacts in this respect. In addition, these options will do less to support enhancements to the quality of the public realm through the regeneration of existing land, and limit opportunities for enhancements to townscapes which supports the setting of the historic environment.

5.3.23. Option E5, the ‘do nothing’ scenario, has less potential to impact on the fabric and setting of the historic environment and landscape and townscape character. However, by not delivering any employment growth, it is also unlikely to lead to any improvements to the setting of heritage assets which may currently be adversely impacted by underutilised, unattractive brownfield sites.

5.3.24. Ultimately, the significance of the effects from each option on the historic environment and landscape and townscape character depends on the location, scale, and nature of development. Therefore, the design and layout of development will play a key role in ensuring adverse impacts on the historic environment and landscape and townscape character are minimised.

IIA theme	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

5.3.25. Whilst Options E1-E4 would all enable an element of transformational growth to take place in Hounslow, Options E1 and E2 have the greatest potential to deliver transformational growth as they seek to deliver an increased level of employment growth. These options therefore have the potential to deliver enhanced economic opportunities and support the economic vitality of existing centres nearby. More broadly, a more transformative approach facilitated through these options will enable the wider regeneration of the borough. This will promote Hounslow as a place to invest; support the significant number of small and midsize enterprises (SMEs) present locally; and enhance employment opportunities. It also offers opportunity for the diversification of the economic offer of the borough through promoting the delivery of a range of employment spaces which reflects local and sub-regional economic needs, and to deliver employment land which can make use of the opportunities afforded by the borough’s proximity to Heathrow. Options which extend into the Green Belt also have greater potential to deliver against the wider range of employment land needs, catering for distribution and warehousing needs as well as office development and development of creative industries in urban areas.

5.3.26. Option E5, the ‘do nothing’ scenario, is unlikely to make use of the significant economic opportunities available locally. This option is therefore unlikely to support significant enhancements to the borough’s economic vitality. It may even result in the borough falling behind other parts of the country in economic terms and could also lead to an increase in unemployment locally.

IIA theme	Outcomes	Option E1	Option E2	Option E3	Option E4	Option E5
Housing	Significant effect?	Yes – negative	Yes – negative	No	Yes – negative	No
	Rank	4	5	1	3	2

5.3.27. The increased level of employment growth proposed through Options E1 and E2 has the potential to reduce land availability for housing, thereby reducing the scope for delivering a range of homes which will meet housing needs in the borough with the potential for negative effects of significance.

This is particularly true of Option E2 which would focus all employment development on available urban and brownfield sites with no extension into the Green Belt.

- 5.3.28. Option E3 would deliver a lower level of employment growth that includes expansion into the Green Belt, meaning the option has greater potential to ensure sufficient land is given over to meeting housing needs within the borough and avoid significant effects arising.
- 5.3.29. Whilst Option E4 would deliver a lower level of employment growth it focuses all employment land needs within existing urban areas and brownfield opportunities, which is again likely to undermine the housing strategy by reducing the amount of land available for housing development (though to a lesser degree than Options E1 followed by E2).
- 5.3.30. Meanwhile, Option E5, the ‘do nothing’ scenario, will allow for the highest level of housing growth by not allocating any land for employment development. However, it is recognised that by not delivering any employment growth, demand for housing in the area may fall as a result of a lack of employment opportunities in the borough.

IIA theme	Outcomes	Option E1	Option E2	Option E3	Option E4	Option E5
Soil contamination and sustainable land use	Significant effect?	Yes – negative	No	Yes – negative	No	No
	Rank	3	1	3	1	2

- 5.3.31. Options E2 and E4, through seeking to deliver development on previously developed land / through the intensification of developed land, will support the efficient use of land. These options also provide additional opportunities for the remediation of underutilised and contaminated land.
- 5.3.32. Options E1 and E3, which involve Green Belt release, will ultimately lead to the loss of greenfield land and associated soil resources with the potential for negative effects of significance, particularly given that land use within the Green Belt would likely focus on distribution and warehousing which often require significant land-take.
- 5.3.33. Whilst Option E5, the ‘do nothing’ scenario, will not lead to the planned loss of any greenfield land, or any significant impacts on soil health or availability, it is recognised that it also does not provide any opportunities for the regeneration and intensification of previously developed land.

IIA theme	Outcomes	Option E1	Option E2	Option E3	Option E4	Option E5
Water quality and water resources	Significant effect?	Yes – negative	No	Yes – negative	No	Uncertain
	Rank	3	1	3	1	2

- 5.3.34. Options E2 and E4, through seeking to deliver development on previously developed land / through the intensification of developed land, have increased potential to support the remediation of contaminated land, which

could support water quality. The options are considered most likely to avoid significant negative effects arising.

- 5.3.35. Options E1 and E3, which involve Green Belt release, will ultimately lead to the loss greenfield land. This has the potential to lead to adverse impacts on water quality by reducing drainage capacity and the role of the landscape and townscape in supporting water quality regulation. Meanwhile, Option E5, the 'do nothing' scenario, may give way to unplanned economic growth with uncertain impacts for water quality.

Table 4.2: Summary findings for the assessment of employment growth options

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
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

Summary

5.3.36. 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.

- 5.3.37. 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.
- 5.3.38. 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.

5.4. Assessment of options relating to tall buildings

5.4.1. Three options have been identified for appraisal:

- **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.

IIA theme	Outcomes	Option TB1	Option TB2	Option TB3
Air quality and noise	Significant effect?	No	Yes - positive	No
	Rank	2	1	3

5.4.2. Air pollution is a significant issue relating to heavy traffic along the A4 / M4. The issue is particularly apparent along the combined A4/ M4 (elevated section) corridor and at Kew Bridge.

5.4.3. Options TB1 and TB2 seek to identify appropriate locations for the development of tall buildings, for which it is assumed that due consideration will be given to factors such as a ‘street canyon effect’ that could limit the dispersal of pollutants and affect air quality. Tall buildings (appropriately located in accessible areas) positively contribute to limiting travel by private vehicle (with limited parking opportunities) and promote more sustainable means of travel that can indirectly benefit air quality – whether purposed for housing or employment.

5.4.4. Option TB3 proposes a presumption against the delivery of tall buildings. Whilst this may ensure negative impacts for air quality relating to tall buildings are avoided, it will promote the wider dispersal of development, given the lower densities that result from low to mid-rise developments. Lower densities and wider dispersal of development is linked to higher levels of private vehicle usage, which could have negative consequences for air quality. For these reasons, Option TB3 is ranked less favourably than Options TB1 and TB2. With Option TB2 promoting more ‘appropriate’ high density locations it ranks first overall with the potential for positive effects of significance.

5.4.5. Despite the implications outlined above, it is assumed that all options would promote development in the most accessible areas of the borough and seek to improve active travel opportunities and sustainable transport connections. Where necessary, it is assumed that development under any option would also deliver the necessary highways mitigation to avoid significant impacts arising. On this basis, no significant negative effects are considered likely.

IIA theme	Outcomes	Option TB1	Option TB2	Option TB3
Biodiversity and green infrastructure	Significant effect?	No	No	No
	Rank	2	1	3

5.4.6. The significance of the effects from each option on features and areas of biodiversity interest largely depends on the location, scale and nature of development and the incorporation of biodiversity enhancement measures. As such all options have the potential to lead to impacts on biodiversity if development is not undertaken to support and enhance the habitats and species which may be present. However, it is assumed that development under any option would avoid the most sensitive biodiversity sites in the borough (especially under Options TB1 and TB2 given appropriate locations are being sought) and with a national requirement for biodiversity net gain, it is assumed that consideration will be given to enhancing biodiversity under any option and significant effects are likely to be avoided. Options TB1 and TB2 are considered to rank better than Option TB3 as they avoid a wider dispersal of lower density development affecting the network of habitats in the borough. With Option TB2 promoting the highest density levels it ranks first.

IIA theme	Outcomes	Option TB1	Option TB2	Option TB3
Climate change	Significant effect?	No	No	No
	Rank	2	1	3

5.4.7. In relation to climate change mitigation, Options TB1 and TB2 have the potential to lead to clustering of taller buildings at appropriate locations which will support sustainable transport use, and support energy efficient design and the incorporation of renewable energy or community energy provision which will help limit per capita greenhouse gas emissions. Minor positive effects could be anticipated in this respect. Option TB2 has increased potential to support the clustering of taller buildings at more locations accessible by sustainable transport (including walking, cycling and public transport) and in proximity to key services and facilities and ranks first accordingly. With Option TB3 promoting a wider dispersal of lower density development it is considered to rank least favourably.

5.4.8. In relation to flood risk, it is difficult to differentiate between the options given that this depends on the precise location of development and the incorporation of mitigation measures such as sustainable urban drainage systems (SuDS). Options TB1 and TB2 seek to identify ‘appropriate’ locations so it is assumed development within areas of high flood risk would be avoided. It is also considered that the provisions of the NPPF and national policy will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented, which should avoid significant negative effects arising under any option.

5.4.9. In terms of the wider elements relating to climate change, for example relating to the urban heat island effect, this also depends on the provision of high-quality design and appropriate infrastructure alongside new housing or employment uses, which it is assumed could be delivered under any option.

IIA theme	Outcomes	Option TB1	Option TB2	Option TB3
Equalities, community, and wellbeing	Significant effect?	Yes - positive	Yes - positive	Yes - positive
	Rank	=	=	=

- 5.4.10. Options TB1 and TB2 have increased potential to support the clustering of taller buildings at appropriate locations accessible by sustainable transport (including walking, cycling and public transport) and in proximity to key services and facilities. A coordinated approach to the location of tall buildings will also help to ensure that the relevant infrastructure can be provided alongside the development.
- 5.4.11. On the other hand, Option TB3 promotes a wider dispersal of lower density development. This could include less accessible areas of the borough, but it would contribute to meeting housing needs and reducing inequalities within more areas of the borough.
- 5.4.12. It is therefore difficult to meaningfully rank the options and given all options provide continued housing, employment, and infrastructure development to support communities, significant positive effects are likely.

IIA theme	Outcomes	Option TB1	Option TB2	Option TB3
Cultural heritage and landscape	Significant effect?	Uncertain	Uncertain	Uncertain
	Rank	=	=	=

- 5.4.13. The eastern part of the Great West Corridor is of significant sensitivity in terms of historic environment. Inappropriate development here has the potential to have impacts on the integrity of a range of historic environment assets, with tall buildings having the potential to lead to significant impacts on the settings of key features and areas of interest. These could include the internationally designated Kew Gardens World Heritage Site, the Grade II* Registered Park and Garden of Gunnersbury Park, a significant number of listed buildings (including the Grade I listed Chiswick House), conservation areas (including the Strand on the Green Conservation Area, Kew Green Conservation Area and Wellesley Road Conservation Area) and key views from the River Thames corridor.
- 5.4.14. Options TB1 and TB2 seek to identify ‘appropriate’ locations (supported by dedicated evidence base development) for tall buildings where it is assumed that effects of significance in relation to cultural heritage and townscape would be avoided but it is recognised that the clustering or concentration of tall buildings can have significant implications for the townscape and sensitive heritage settings.
- 5.4.15. A wider dispersal of lower density development under Option TB3 could help to minimise the effects of tall buildings in sensitive heritage settings, but it would also spread development across more areas of Borough, potentially affecting more heritage settings cumulatively.
- 5.4.16. It is therefore difficult to rank the options at this stage, in the absence of precise development locations. Uncertainty also remains in relation to the significance of the effects arising from each option, though it is considered

that each option has the potential to avoid significant effects arising by careful planning and policy mitigation.

IIA theme	Outcomes	Option TB1	Option TB2	Option TB3
Economy and employment	Significant effect?	Yes - positive	Yes - positive	Yes - positive
	Rank	1	1	2

5.4.17. Options TB1 and TB2 would promote the clustering of tall buildings at locations identified as appropriate for such use. This would predominantly target the Great West Corridor and extend to additional town centres under Option TB2. Such sites would be considered prime, accessible locations for continued economic growth with good potential to support significant positive effects in relation to this IIA theme. For example, the Great West Corridor is a key location in the borough where demand for flexible office space and space for creative industries is high.

5.4.18. Option TB3 promotes a wider dispersal of lower density development, which still has the potential to support a range of different sectors in continued economic growth across more areas of the borough, and significant positive effects in this respect.

5.4.19. However, by maximising economic growth in the most accessible areas of the borough, Options TB1 and TB2 are ranked marginally better than Option TB3.

IIA theme	Outcomes	Option TB1	Option TB2	Option TB3
Housing	Significant effect?	Yes - positive	Yes - positive	Yes - positive
	Rank	2	2	1

5.4.20. All options have the potential to deliver significant housing growth in the borough. However, a wider spread of lower density development (Option TB3) has increased potential to deliver a broader range of housing types and tenures to meet local housing needs in more areas of the borough. On this basis, Option TB3 is ranked more favourably than Options TB1 and TB2.

IIA theme	Outcomes	Option TB1	Option TB2	Option TB3
Soil contamination and sustainable land use	Significant effect?	No	No	No
	Rank	1	1	2

5.4.21. Both Options TB1 and TB2 would support the efficient use of land through enabling the provision of taller buildings within existing urban areas and limiting the spread of development across the borough, including, potentially, on greenfield land. For these reasons, the options are considered to rank better than Option TB3 which promotes a wider dispersal of lower density development.

5.4.22. The extent to which either option leads to the remediation of contaminated land depends on the location and approach to development and under all options it is assumed that significant negative effects could be avoided.

IIA theme	Outcomes	Option TB1	Option TB2	Option TB3
Water quality and water resources	Significant effect?	No	No	No
	Rank	1	1	2

5.4.23. All options are likely to place similar demands upon water resources, and wastewater capacity would need to be a consideration under all options, considering either concentrated effects in higher density areas under Options TB1 and TB2 (where impacts may be greater but addressed through fewer solutions), or dispersed effects in lower density development under Option TB3 (where impacts may be lower but spread across more areas of the borough).

5.4.24. In terms of water quality, it is assumed that all options would avoid development that would significantly impact upon water quality, either in the immediate vicinity of waterbodies or by impacting drainage rates.

5.4.25. All options are considered to have good potential to avoid significant effects arising but Option TB3 is ranked marginally lower than Options TB1 and TB2 given the greater dispersal of development has greater potential to impact upon water quality, particularly if this option were to include more greenfield land development.

Table 4.3: Summary findings for the assessment of options relating to tall buildings

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

Summary:

- 5.4.26. 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.
- 5.4.27. 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.

5.5. Transport options assessment

5.5.1. Three options have been identified for appraisal:

- **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.

IIA theme	Outcomes	Option T1	Option T2	Option T3
Air quality and noise	Significant effect?	Yes – positive	Yes – positive	No
	Rank	1	2	3

5.5.2. The provision of major new rail access improvements under Option T1, as well as sustainable transport access improvements more broadly and active travel opportunities, will promote the use of sustainable modes of transport, limiting impacts of growth in the borough on air and noise quality.

5.5.3. Whilst Option T2 would also seek to enhance sustainable transport options, including through bus service improvements and demand management measures, Option T1 offers more scope to offer a longer-term solution to existing air and noise quality issues in the borough, and to limiting the potential impacts from growth. It is also considered that Option T1 will do more to enable a transformative approach to the development of the borough, which will enable enhancements to air and noise quality to arise through the integration of green infrastructure improvements, which may help reduce air and noise pollution.

5.5.4. As Option T3 will not deliver any transport improvements, other than those necessary as determined through the development management process, it is unlikely to lead to any significant changes to the baseline with regard to air and noise quality.

IIA theme	Outcomes	Option T1	Option T2	Option T3
Biodiversity and green infrastructure	Significant effect?	Uncertain	No	No
	Rank	3	1	2

5.5.5. Without knowing the details of the major new rail access improvements likely to be delivered under Option T1, the potential impacts on biodiversity and green infrastructure are uncertain. However, it is recognised that extensions to existing railway lines and the delivery of new stations will likely take place on existing lines/ brownfield land. Impacts on biodiversity because of the loss and fragmentation of existing habitats and ecological networks, as well as disturbance to habitats and species during the construction phase are

most likely to occur with Southern Access to Heathrow. Nevertheless, by encouraging the use of public transport, this option will likely discourage driving in the parts of the borough benefiting from rail access improvements, therefore reducing traffic and congestion, and associated adverse impacts on wildlife, such as from road kills, fragmentation, noise, and air pollution. Similar benefits are anticipated under Option T2, which also encourages the use of public transport.

- 5.5.6. It should be noted however that the delivery of new transport infrastructure offers significant potential for the enhancement of biodiversity networks if high quality multifunctional green infrastructure provision is incorporated. This provides the opportunity to support and enhance existing ecological networks in the borough. Whilst both Options T1 and T2 offer this opportunity, it is considered that Option T1 will provide for more transformative improvements to the transport network, which will enable greater enhancements to existing ecological networks. Ultimately, the nature and significance of effects under both options will be dependent on the design and layout of new transport infrastructure and the degree to which it integrates measures such as green infrastructure.
- 5.5.7. Whilst Option T3, which will not deliver any transport improvements, is unlikely to lead to any direct impacts on biodiversity, by not supporting sustainable transport improvements it is less likely to reduce traffic and congestion and associated adverse impacts on wildlife. Due to this, Option T2 is ranked higher than Option T3.

IIA theme	Outcomes	Option T1	Option T2	Option T3
Climate change	Significant effect?	No	No	No
	Rank	1	2	3

- 5.5.8. Options T1 and T2 will support modal shift to more sustainable modes of transport than the private car. As such, these options have potential to support a limitation of GHG emissions from transport. Conversely, Option T3, which will not deliver any transport improvements, will likely support a continuation of the baseline and therefore a decrease in GHG emissions from transport under this option is unlikely.
- 5.5.9. However, it is also recognised that the extent to which the options would lead to increases in GHG emissions is also dependent on the extent to which 1) each option stimulates growth in the built footprint of the borough; and 2) new development is supported by sustainable transport infrastructure.
- 5.5.10. In this respect, Option T1 will support a higher level of growth when compared to Options T2 and T3. However, it should be noted that some transformational growth in the borough will also be enabled through Option T2. Whilst Option T1 is likely to lead to an element of increased overall GHG emissions by promoting a larger increase in the built footprint of the borough, through offering major new rail access improvements, as well as sustainable transport access improvements more broadly and active travel opportunities, this option has increased potential to limit GHG emissions on a per capita basis. Option T1 also offers more significant opportunities for green

infrastructure enhancements across Hounslow. This has the potential to increase the ability of the borough to act as a carbon sink.

- 5.5.11. In terms of climate change adaptation, development of areas of existing open space in the borough has the potential to lead to a reduction of the capacity of existing land to limit fluvial flooding and surface water run-off. This may have implications for flood risk. However, as noted above, Option T1 provides opportunities for green infrastructure enhancements across the borough. Given the increased level of transformational change likely to be stimulated through this option, there may be some further potential for the integration of significant new green and blue infrastructure. This could help increase the borough’s resilience to the likely impacts of climate change, including extreme weather events and the urban heat island effect.
- 5.5.12. In relation to the fluvial flood risk present in the borough associated with the River Brent, Longford River and Crane River, the options are unlikely to lead to development within flood risk areas or development which increased the risk of flooding in these areas. This is in part due to the provisions of the NPPF and national policy, which will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented.
- 5.5.13. Overall, given the global nature of climate change, and the provisions of the NPPF and national policy with regard to flood risk, no significant effects are considered likely under any of the options.

IIA theme	Outcomes	Option T1	Option T2	Option T3
Equalities, community, and wellbeing	Significant effect?	Yes – positive	Yes – positive	No
	Rank	1	2	3

- 5.5.14. Whilst both Options T1 and T2 would enable an element of transformational growth to take place in the borough, of the two options, Option T1 is more likely to deliver transformational growth. This could deliver enhanced economic opportunities as well as increased housing provision and community infrastructure. It also offers additional opportunities to facilitate enhancements to the public realm and the quality of townscapes, and for facilitating green infrastructure enhancements. This will support residents’ quality of life and promote health and wellbeing.
- 5.5.15. The delivery of major new rail access improvements through Option T1 will promote the use of sustainable modes of transport, enhancing accessibility to services, facilities, and employment opportunities for all groups (including those with ‘protected characteristics’). Option T2 will also promote the use of sustainable modes of transport by delivering bus service improvements and implementing demand management measures. However, as this option does not include major rail schemes, the associated benefits will likely not be as significant as under Option T1.
- 5.5.16. Option T3, which will not deliver any transport improvements, would do less to help address the key socio-economic and quality of life issues influenced by transport in Hounslow. Hence, a range of issues are less likely to be

addressed without appropriate interventions, including accessibility and severance issues which can contribute to social exclusion.

IIA theme	Outcomes	Option T1	Option T2	Option T3
Cultural heritage and landscape	Significant effect?	Uncertain	Uncertain	No
	Rank	2	2	1

- 5.5.17. Without knowing the details of the major new rail access improvements likely to be delivered under Option T1, the potential impacts on heritage assets and landscape and townscape character are uncertain. Nevertheless, it is recognised that extensions to existing railway lines and the delivery of new stations may lead to impacts on the setting of heritage assets and landscape and townscape character, but these effects are minimised as most rail schemes target existing lines or brownfield land for station development. Nevertheless, by encouraging the use of public transport, this option will likely discourage driving in the parts of the borough benefiting from rail access improvements, therefore reducing traffic and congestion, and associated adverse impacts on the historic environment and landscape and townscape character. Similar benefits are anticipated under Option T2, which also encourages the use of public transport.
- 5.5.18. Whilst the significance of the impacts under each option on features and areas of historic environment interest and landscape and townscape character depend on the location, scale and nature of development, Option T1 – and to a lesser degree T2 – have the potential to stimulate transformational change in the borough, which could increase the likelihood (and potential magnitude) of impacts. However, it is also recognised that well sited development, coupled with high quality design and layout, can support enhancements to heritage assets and their setting and landscape and townscape character. Likewise, new development areas offer significant opportunities to rejuvenate disused and underutilised heritage assets and enhance their settings, also contributing to improvements in townscape.
- 5.5.19. As such, 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.
- 5.5.20. Whilst Option T3, which will not deliver any transport improvements, is unlikely to lead to direct impacts on features and areas of historic environment interest and landscape and townscape character, it will not support a modal shift away from the private car. Therefore, traffic and congestion are unlikely to improve, and the associated adverse impacts of traffic and congestion on the historic environment and landscape and townscape character are likely to persist.

IIA theme	Outcomes	Option T1	Option T2	Option T3
Economy and employment	Significant effect?	Yes – positive	Yes – positive	No
	Rank	1	2	3

5.5.21. Whilst both Options T1 and T2 will enable an element of transformational growth to take place in the borough, of the two options, Option T1 is more likely to deliver transformational growth. This is because Option T1 will deliver a more comprehensive expansion of accessibility through the delivery of major new rail access improvements. As such, this option has increased potential to boost economic vitality through promoting the borough as a place to invest, as well as supporting the significant number of SMEs present locally by enhancing local supply chains and enhancing employment opportunities.

5.5.22. As Option T3 will not deliver any transport improvements, other than those necessary as determined through the development management process, it is unlikely to lead to any improvements to the economy and employment.

IIA theme	Outcomes	Option T1	Option T2	Option T3
Housing	Significant effect?	Yes – positive	Yes – positive	No
	Rank	1	2	3

5.5.23. Option T1 – and to a lesser degree Option T2 – will support housing growth in the borough by delivering improvements to the transport network, with a particular focus on sustainable modes of transport. This will enable residents of new developments to easily access services, facilities, and employment opportunities both locally and further afield with ease, increasing the attractiveness of the borough as a place to live, thus stimulating demand for housing.

5.5.24. As Option T3 will not deliver any transport improvements, other than those necessary as determined through the development management process, it is less likely to support housing growth in the borough.

IIA theme	Outcomes	Option T1	Option T2	Option T3
Soil contamination and sustainable land use	Significant effect?	Uncertain	No	No
	Rank	3	1	2

5.5.25. Options T1 and T2 both provide an opportunity to remediate contaminated land through the delivery of growth. They also provide an opportunity to regenerate and rejuvenate previously developed and underutilised land in the borough. This will support the efficient use of land. In this respect Option T1, through offering additional potential for the delivery of significant growth in the borough, could also increase the potential for an intensification of land uses. However, it is recognised that extensions to existing railway lines and the delivery of new stations, which could take place under Option T1, has the potential to lead to the loss of greenfield land. However, this is uncertain at this stage.

5.5.26. As Option T3 will not deliver any transport improvements, other than those necessary as determined through the development management process, it will not result in the loss of greenfield land. However, this option does not provide an opportunity to regenerate and rejuvenate previously developed and underutilised land in the borough. In this respect, Option T2 – which will also not result in the loss of greenfield land – is considered to perform more favourably than Option T3.

IIA theme	Outcomes	Option T1	Option T2	Option T3
Water quality and water resources	Significant effect?	Yes – positive	Yes – positive	No
	Rank	1	2	3

5.5.27. In terms of water quality, it is difficult to reach a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place. For example, sustainable drainage systems (SuDS) are an effective means of minimising surface water runoff and hence pollution to waterbodies.

5.5.28. Nevertheless, Options T1 and T2 both have the potential to support the remediation of contaminated land, with benefits for water quality. Due to the higher level of growth likely to be facilitated through Option T1, it has increased potential to remediate significant areas of contaminated land. The option may also facilitate more comprehensive green infrastructure enhancements. This has the potential to increase the capacity of the townscape to support improved water quality.

5.5.29. It is also recognised that by supporting modal shift away from the private car, Options T1 and T2 have the potential to reduce pollution to waterbodies from vehicles, including from tire and pavement wear, engine and brake wear, and exhaust emissions.

Table 4.4: Summary findings for the assessment of transport options

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
Water quality and water resources	Significant effect?	Yes – positive	Yes – positive	No
	Rank	1	2	3

Summary

5.5.30. 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.

5.5.31. 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.

6. Developing the preferred approach

6.1.1. The following overview presents an overview of LBH's reasons for selecting the preferred approaches for the HLP in light of the alternatives considered.

Housing

6.1.2. 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.

6.1.3. 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.

6.1.4. 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

6.1.5. 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.

6.1.6. 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).

- 6.1.7. 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

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

- 6.1.9. 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.

- 6.1.10. 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

- 6.1.11. 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.

- 6.1.12. 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.

- 6.1.13. 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.

Part 2: What are the IIA findings at this stage?

7. Approach to assessing the HLP

7.1. Overview

- 7.1.1. Chapters 7, 8 and 9 present an appraisal of the HLP, as currently published under Regulation 19 of the Planning Regulations.

7.2. Methodology

- 7.2.1. 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 1.1**) as a methodological framework.
- 7.2.2. Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is nonetheless possible and helpful to comment on merits (or otherwise) of the HLP in more general terms.
- 7.2.3. Within the appraisal narrative below 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).
- 7.2.4. Finally, it is important to note that effects are predicted taking account of the effect characteristics and 'significance criteria' presented within Schedules 1 and 2 of the SEA Regulations.¹² 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.

7.3. Policies

- 7.3.1. There are 67 policies in the draft Local Plan, which are listed in **Table 7.1** overleaf.

¹² Environmental Assessment of Plans and Programmes Regulations 2004

Table 7.1 Policies in the draft Local Plan

Policy Reference	Policy Name
SV1	Great West Corridor Plan
SV2	West of the Borough Plan
P1	Great West Corridor
P1(a)	Great West Corridor West
P1(b)	Great West Corridor Central
P1(c)	Great West Corridor East
P2	Cranford and Heston Neighbourhoods
P3	Feltham
P4	Land at Hatton Fields
TC1	Town and Neighbourhood Centre Network
TC2	Ensuring the Future Vitality of Town Centres
TC3	Managing the Growth of Retail and other Main Town Centre Uses
TC4	Managing Town Centre Uses
TC5	Managing Neighbourhood Centres and Isolated Local Shops
ED1	Promoting Employment Growth and Development
ED1.1	West of the Borough (Heathrow Opportunity Area)
ED1.2	Great West Corridor
ED2	Maintaining the Borough's Employment Land Supply
ED3	Hotels and Visitor Accommodation
ED4	Enhancing Local Skills
SC1	Increasing Housing Supply
SC2	Maximising the Provision of Affordable Housing
SC3	Meeting the Need for a Mix of Housing Size and Type
SC4	Scale and Density of New Housing Development
SC5	Ensuring Suitable Internal and External Space
SC6	Managing Building Conversions and Sub-division of the Existing Housing
SC7	Residential Extensions and Alterations
SC8	Specialist and Supported Housing for Older People and Vulnerable People
SC9	Gypsy and Traveller and Travelling Showpeople
SC10	Housing in Multiple Occupation, Hostels, Bed & Breakfast, Temporary and Emergency Accommodation
SC11	Other Forms of Housing
CC1	Context and Character

Policy Reference	Policy Name
CC2	Urban Design and Architecture
CC3	Tall Buildings
CC4	Heritage
CC5	Advertisement Panels, Hoardings and Structures
GB1	Green Belt and Metropolitan Open Land
GB2	Open Space
GB3	Open Space in Education Use
GB4	The Green Infrastructure Network
GB5	Blue Ribbon Network
GB6	Residential Moorings
GB7	Biodiversity
GB8	Allotments, Agriculture and Local Food Growing
GB9	Play Space, Outdoor Sports Facilities and Burial Space
CI1	Providing and Protecting Community Facilities
CI2	Education and School Places
CI3	Health Facilities and Healthy Places
CI4	Culture and Leisure Facilities
CI5	Places of Worship
EQ1	Energy and Carbon Reduction
EQ2	Sustainable Design and Construction
EQ3	Flood Risk and Surface Water Management
EQ4	Air Quality
EQ5	Noise
EQ6	Lighting
EQ7	Sustainable Waste Management
EQ8	Contamination
EQ9	Hazardous Substances
EQ10	Minerals
EC1	Strategic Transport Connections
EC2	Developing Sustainable Transport Network
EC3	Heathrow Airport
EC4	Telecommunications
IMP1	Sustainable Development
IMP2	Delivering Site Allocations
IMP3	Implementing and Monitoring the Local Plan

8. Appraisal of the HLP

8.1. HLP overview

- 8.1.1. The HLP guides future development across the borough over the plan period 2020 – 2041. It brings together the previous work on the Local Plan Review to create a comprehensive single document that will replace the existing suite of planning documents.
- 8.1.2. The plan is guided by both the parameters of the NPPF and the London Plan. The London Plan identifies a minimum housing target to be met in the period up to 2029 (a proportion of which must be delivered on small sites) as well as a strategic target for the percentage of trips undertaken using active travel or public transport methods. It also places emphasis on the role of the Local Plan in defining tall buildings and identifying appropriate areas for their development. The London Plan also identifies the Heathrow Opportunity Area (shared with the London Borough of Hillingdon) as an area to accommodate significant new housing and employment growth. However, it strongly opposes any further expansion of Heathrow that would increase aircraft movements. The London Plan further identifies the Hounslow (Great West Corridor) Strategic Outer London Development Centre for employment use and another Opportunity Area within the Great West Corridor.
- 8.1.3. The policies in the plan (as set out in **Table 6.1**) are divided into ten themes providing guidance for development that will deliver against the forecasted housing and employment needs of the borough whilst protecting the borough's key assets and improving its infrastructure provisions.
- 8.1.4. The spatial strategy for the plan focuses most housing growth towards areas that have capacity for change, including the borough's town centres and the Great West Corridor and the West of the Borough Opportunity Areas. Employment land needs will also be met through development at these same locations, including through mixed-use development and development at the Heathrow Opportunity Area (which will require minor Green Belt adjustments). A total of 123 allocation sites are identified.

8.2. Air quality and noise

- 8.2.1. The entire borough was declared an Air Quality Management Area (AQMA) in 2006 due to high levels of nitrogen dioxide (NO₂). The highest concentrations of NO₂ in the borough (>45) can be found along the path of the M4 motorway across the north of the borough, particularly where it meets the A4 (Great West Road). The following sites are adjacent to the M4:

- **Site 19 (The Mille Building)**
- **Site 21 (Enterprise, Boston Park Road)**
- **Site 22 (1020 Great West Road)**
- **Site 23 (Texaco Filling Station)**
- **Site 25 (Layton Road Car Park)**
- **Site 26 (Phoenix Business Park)**

- **Site 27 (Kew Bridge Distribution Centre)**
- **Site 28 (27 Great West Road)**
- **Site 29 (EMC Tower)**
- **Site 30 (Vantage West)**
- **Site 32 (Brentford Fountain Leisure Centre)**
- **Site 33 (Esso Filling Station, Chiswick Roundabout)**
- **Site 34 (Former Natwest Bank Site, Chiswick)**
- **Site 35 (B&Q Chiswick)**
- **Site 77 (Land south of Western International Market)**
- **Site 113 (69-77 Boston Manor Road)**
- **Site 118 (GSK)**
- **Site 120 (Land north of Church Road, Cranford)**

8.2.2. Concentrations of NO₂ reduce rapidly with increasing distance from these roads and their larger junctions. However, they are elevated above the 25-28 µg range in two areas: in the west of the borough in proximity to Heathrow Airport and south of the centre of the borough around Mogden Sewage Works.

8.2.3. The highest levels of noise pollution in Hounslow are associated with Heathrow Airport, which is adjacent to the borough. The following site allocations are within a noise contour of over >65 dBA Leq:

- **Site 48 (Vacant Land at Dick Turpin Way)**, which has a noise contour of 72 dBA Leq.
- **Site 49 (Site at Faggs Road)**, which has a noise contour of 72 dBA Leq.
- **Site 57 (Airport Business Park)**, which has a noise contour of 69 dBA Leq.
- **Site 43 (Heathrow International Tradign Estate)**, which has a noise contour of 66 dBA Leq.
- **Site 45 (Land at Green Lane)**, which has a noise contour of 66 dBA Leq.
- **Site 50 (Tesco Dukes Green Avenue)**, which has a noise contour of 66 dBA Leq.
- **Site 122 (Rectory Farm)**, which has a noise contour of 66 dBA Leq.

8.2.4. Air quality is primarily addressed through Policy EQ4 (Air Quality), which expects development proposals to, amongst other things, a) be air quality neutral as a minimum, in line with the London Plan; b) carry out Air Quality Assessments (AQAs) where major developments or proposals involving a change of use to air quality sensitive uses are proposed; and c) demonstrate that design measures have been used to minimise new or existing users' exposure to air pollution where the proposal is located within either an Air Quality Focus Area (AQFA) or the Great West Corridor Opportunity Area.

- 8.2.5. Also of relevance, Policy EC1 (Strategic Transport Connections) seeks to achieve the Council's environmental objectives, including tackling climate change and air quality and improving public health locally. Adding to this, Policy EC2 (Developing Sustainable Transport Network) seeks to facilitate improvements to air quality and health and wellbeing. Policy CC2 (Urban Design and Architecture) also expects development proposals to be designed to mitigate noise and air quality issues.
- 8.2.6. Focusing on Feltham, which is a town in the southwest of the borough adjacent to Heathrow Airport, Policy P3 highlights that proposals should, amongst other things, support health and wellbeing by promoting interventions that improve air quality; ensure sensitive uses are located away from pollution sources; and ensure that new development sufficiently mitigates the impacts of noise and air pollution (in line with Policy EQ4). Place Policy P1 (Great West Corridor) also includes air quality requirements for proposals that ensure any new residential development is designed to fully mitigate any noise and air quality issues and implements strategies to improve air quality along the A4/M4 corridor. Furthermore, for site allocations that are located in areas where poor air quality has been identified as an issue, specific requirements to mitigate the impact of reduced air quality are set out within the allocation text. These include requirements that development must incorporate design solutions to minimise exposure to air pollution. For all other allocation sites, requirements set out that proposals must be at least air quality neutral, be accompanied by an Air Quality Assessment and be in accordance with Local Plan Policy EQ4 and the London Plan.
- 8.2.7. Air and noise is also a focus of Objective 7 (Ensuring Environmental Quality), which seeks to reduce the detrimental effects of noise, poor air quality and general environmental pollution on all sensitive users through strong environmental standards, the design and positioning of buildings, and greening. In addition, Objective 8 (Enhancing Connectivity) of the plan seeks to reduce unnecessary car travel and congestion and improve air quality and health and wellbeing through the delivery of targeted highway improvements, electric vehicle infrastructure, better car-sharing options and limiting car-parking offers. The plan performs well in this respect.
- 8.2.8. Notably, all future development will need to conform to these policy provisions, including at the many site allocations proposed in the plan. With most growth focused at the most accessible areas of the borough (e.g., town centres), opportunities to maximise access to sustainable transport modes are bolstered through the plan. Given that most areas where growth is planned in the borough are well served by public transport, it is considered development has good potential to avoid significant effects arising in relation to air quality.
- 8.2.9. Overall, 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. On this basis, **broadly neutral to minor positive effects** are considered most likely. The air quality

mitigation requirements for site in the Great West Corridor are also most stringent, along with sites within AQFAs. In the Great West Corridor the public transport improvements and walking and cycling connections should have a positive impact and contribute to more sustainable travel patterns and a reduction in private car use over the plan period. The HLP is considered most likely to lead to **neutral effects** in relation to noise.

Table 8.1 Likely effects – air quality and noise

Likely effects	Effect dimensions	Recommendations / mitigation
Limitation of the effects of employment and housing growth on existing air quality issues in the borough.	Direct, long-term, and positive.	No further action proposed.
Limitation of the effects of employment and housing growth on existing noise quality issues in the borough.	Direct, long-term, and positive.	No further action proposed.
Increased absorption of air pollutants from a greening of the built environment and the delivery of green infrastructure.	Direct, long-term, and positive.	No further action proposed.
Enhanced air and noise quality from improvements to sustainable transport networks.	Direct and indirect, long-term, and positive.	No further action proposed.

8.3. Biodiversity and green infrastructure

8.3.1. Hounslow contains a designated area within the South West London Waterbodies Special Protection Area (SPA) and Ramsar site, which is also designated as the Kempton Park Reservoirs Site of Special Scientific Interest (SSSI). Only one of the site allocations within the draft Local Plan is within 1km of this SPA, Ramsar site and SSSI. This is **Site 70 (Royal Naval Association Club)**, which is ~880m north of the designated site. However, this site is previously developed land that is currently in use, and therefore a change of use to housing is unlikely to result in a significant change to the baseline. Nevertheless, it is recognised that there could be some disturbance to the internationally and nationally designated site during the construction phase. The Habitats Regulations Assessment (HRA) accompanying the HLP has explored the potential for the HLP to affect the integrity of these sites, and concludes no likely significant effects either alone or in combination with other plan and projects.

8.3.2. The borough also contains the nationally designated Syon Park SSSI. Several of the site allocations are within 1km of this SSSI; these are:

- **Site 103 (West Middlesex Hospital)**, which is ~320m west of the SSSI.
- **Site 96 (Europa House)**, which is ~400m southwest of the SSSI.
- **Site 101 (Brentford Group Practice)**, which is ~740m north of the SSSI.
- **Site 16 (Brentside Park)**, which is ~920m northwest of the SSSI.

8.3.3. Similarly to the above, these sites are all previously developed land that is currently in use, and therefore a change of use to housing is unlikely to result

in a significant change to the baseline. Nevertheless, it is recognised that there could be some disturbance to the SSSI during the construction phase.

8.3.4. Notably, the Impact Risk Zone (IRZ) for the Syon Park SSSI impacts the above site allocations in the following ways:

- **Site 103 (West Middlesex Hospital)**, which is allocated for 250 homes, is in an IRZ that impacts residential development of 100 units or more.
- **Site 96 (Europa House)**, which is allocated for 20 homes, is in an IRZ that impacts residential development of 100 units or more.
- **Site 101 (Brentford Group Practice)**, which is allocated for 60 homes, is in an IRZ that impacts residential development of 100 units or more.
- **Site 16 (Brentside Park)**, which is allocated for 390 homes, is partially in an IRZ that impacts residential development of 100 units or more.

8.3.5. In light of the above, the developers of **Site 103 (West Middlesex Hospital)** and **Site 16 (Brentside Park)** will need to consult with Natural England.

8.3.6. The borough also contains nine Local Nature Reserves (LNRs) and 47 Sites of Importance for Nature Conservation (SINCs). The following sites are within 50m of an LNR:

- **Site 96 (Europa House)**, which is ~50m west of Isleworth Ait LNR.
- **Site 107 (Sainsbury's Chiswick)**, which is ~50m east of Gunnersbury Triangle LNR.

8.3.7. The following sites contain, or contain part of, a SINC:

- **Site 57 (Airport Business Park)** contains a SINC of borough importance (grade I).
- **Site 46 (Ron Smith Recycling, Green Lane)** contains part of a SINC of metropolitan importance (The Crane Corridor).
- **Site 37 (Gunnersbury Station Car Park)** contains part of a SINC of borough importance (grade II).
- **Site 120 (Land north of Church Road, Cranford)** contains part of a SINC of local importance.

8.3.8. In addition to the above, eight sites are adjacent to a SINC of metropolitan importance; eight sites are adjacent to a SINC of borough importance (grade I); four sites are adjacent to a SINC of borough importance (grade II); and one site is adjacent to a SINC of local importance.

8.3.9. Again, these sites are all previously developed land that is currently in use, and therefore a change of use to housing is unlikely to result in a significant change to the baseline. Nevertheless, it is recognised that there could be some disturbance to these LNRs and SINCs during the construction phase, and where these are onsite it will be important to ensure they are retained and enhanced through environmental net gains in development.

8.3.10. Hounslow contains several Biodiversity Action Plan (BAP) priority habitats, including large areas of woodpasture and parkland. The borough also contains notable areas of good quality semi-improved grassland, lowland

heathland, and lowland fens, as well as a substantial network of deciduous woodland. The following sites overlap with a priority habitat:

- **Site 57 (Airport Business Park)** has a 74% overlap with good quality semi-improved grassland and a 3% overlap with deciduous woodland.
- **Site 55 (Scout Hut Bedfont Lane)** has a 59% overlap with deciduous woodland.
- **Site 29 (EMC Tower)** has a 6% overlap with deciduous woodland.
- **Site 46 (Ron Smith Recycling, Green Lane)** has a 4% overlap with deciduous woodland.
- **Site 77 (Land south of Western International Market)** has a 4% overlap with deciduous woodland.
- **Site 27 (Kew Bridge Distribution Centre)** has a 1% overlap with deciduous woodland.

8.3.11. In response to the above, Policy GB7 (Biodiversity) of the draft Local Plan outlines that it will promote the conservation, restoration and enhancement of priority habitats and ecological networks.

8.3.12. Policy GB7 also outlines that development will only be permitted where it can be shown that significant adverse impacts on biodiversity has been avoided, mitigated, or as a last resort, compensated for. In addition, the policy expects development proposals to, amongst other things, achieve at least 10% biodiversity net gain (BNG), in line with the requirements set out in the Environment Act 2021, and to incorporate biodiversity supporting green and blue infrastructure and other habitat features into scheme design.

8.3.13. Also of relevance, Policy GB4 (The Green Infrastructure Network) identifies and protects the green infrastructure network. The policy outlines that development proposals will be expected to make a positive contribution to the green infrastructure network by improving its quality, functions, linkages, accessibility, design, biodiversity value and management.

8.3.14. Biodiversity is also a focus of Objective 5 (Maximising the benefits of our green and blue infrastructure) of the draft Local Plan, which seeks to *“protect, maintain and improve the quality, openness, accessibility, amenity, biodiversity, function and recreational value of the borough’s green and blue spaces”* and *“ensure an overall net gain in biodiversity”*. It also seeks to *“contribute to biodiversity and wider environmental resilience”*.

8.3.15. Overall, the draft Local Plan is predicted to lead to **minor positive effects** on biodiversity and green infrastructure. 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 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. Development will also be expected to deliver 10% BNG in line with the Environment Act 2021.

Table 8.2 Likely effects – biodiversity and green infrastructure

Likely effects	Effect dimensions	Recommendations / mitigation
Enhancements to the borough’s multifunctional green infrastructure networks.	Direct, long-term, and positive.	None proposed.
Enhancements to local and sub-regional ecological networks.	Direct and indirect, long-term, and positive.	None proposed.
Impact to locally designated SINC’s.	Direct, long-term, positive and negative.	Green infrastructure enhancements and sensitive design. Provision of buffers to areas of SINC and other on-site mitigation where feasible. Where impact is unavoidable, compensation towards habitat improvements on other local sites.
Facilitation of a net gain in biodiversity.	Direct and indirect, long-term, and positive.	None proposed.
Improved ecological resilience.	Direct and indirect, long-term, and positive.	None proposed.

8.4. Climate change

- 8.4.1. With regard to greenhouse gas (GHG) emissions, per capita emissions (tCO₂e) in Hounslow decreased from 7.9 to 3.5 between 2005 and 2021. The figure for 2021 is notably lower than the national average (5.5 tCO₂e). Transport was the largest emitting sector in Hounslow in 2021, contributing 322.3 ktCO₂e. In response to this, Policy EC2 (Developing Sustainable Transport Network) of the draft Local Plan promotes ‘car-free’ or ‘low car’ development and seeks to rebalance the transport system towards walking and wheeling, cycling and public transport. To do this, the policy expects development proposals to demonstrate they are located appropriately with public transport access and capacity, road capacity and access to good quality walking, wheeling, and cycling networks.
- 8.4.2. In addition to the above, it is recognised that the site allocations are predominantly in locations with good access to public transport and key services and facilities, with associated positive effects for climate change mitigation.
- 8.4.3. With regard to flood risk, Hounslow is at risk from multiple sources including tidal (caused by surges in the Thames Estuary), fluvial (from other rivers, such as the rivers Brent and Crane), surface water, sewers, and groundwater. Significant flooding took place across the borough in July 2021. The northeastern part of the borough overlaps with an area of Flood Zone 3 associated with the River Thames. The following site allocations overlap with Flood Zone 2 / 3:
- **Site 46 (Ron Smith Recycling, Green Lane)**, more than 50%.
 - **Site 95 (Tesco Mogden Lane)**, more than 50%.
 - **Site 96 (Europa House)**, more than 50%.

- **Site 97 (Rugby Road)**, more than 50%.
- **Site 105 (Chiswick Telephone Exchange)**, more than 50%.
- **Site 106 (Royal Mail, Chiswick Delivery Office)**, more than 50%.
- **Site 107 (Sainsbury's Chiswick)**, more than 50%.
- **Site 116 (1 Burlington Lane)**, more than 50%.
- **Site 17 (Great West Plaza)**, less than 50%.
- **Site 43 (Heathrow International Trading Estate)**, less than 50%.
- **Site 103 (West Middlesex Hospital)**, less than 50%.
- **Site 110 (Albany Riverside)**, less than 50%.
- **Site 111 (Brentford Policy Station)**, less than 50%.

8.4.4. In addition to the above, some of the site allocations overlap with areas of medium-high risk. However, it is considered that national planning policy, including sequential and exception tests supported by the Strategic Flood Risk Assessment (SFRA), will mean that development does not lead to an increase in fluvial or surface water flood risk. In addition, sustainable drainage systems (SuDS) will likely be utilised where appropriate to minimise any on-site surface water flood risk.

8.4.5. Flood risk is addressed through Policy EQ3 (Flood Risk and Surface Water Management) of the draft Local Plan, which expects development proposals to prepare flood risk assessments, consistent with the requirements of the Environment Agency and the Strategic Flood Risk Assessment (SFRA) and apply the sequential approach within site boundaries to ensure the development remains safe for its lifetime and that flood risk is not increased elsewhere. The plan performs well in this respect.

8.4.6. Also of relevance is Policy GB5 (Blue Ribbon Network), as a functional Blue Ribbon Network (as part of the wider green and blue infrastructure network) will have a crucial role in meeting the challenges of climate change, particularly the increased likelihood of extreme weather events which will lead to more frequent and severe tidal, fluvial and surface water flooding.

8.4.7. With regard to climate change mitigation, Policy CC2 (Urban Design and Architecture) expects development proposals to, amongst other things, adapt to and mitigate against the effects of climate change and consider sustainable design and construction strategies from the outset.

8.4.8. In addition, Policy EQ1 (Energy and Carbon Reduction) proposes higher benchmark improvement targets than the London Plan 2021 and extends these requirements to minor residential developments as well as major development. The policy also increases the carbon offset price to ensure that off-site carbon reductions can be secured. In addition, all major developments must prioritise low temperature communal heating systems within Heat Network Priority Areas, as per the heating hierarchy set out in the London Plan.

8.4.9. Policy EQ2 (Sustainable Design and Construction) expects development proposals to incorporate established principles for sustainable design and

construction as set out in the London Plan and associated guidance, including passive design, water efficiency standards, SuDS, the reuse and recycling of construction materials, reducing overheating and reliance on air conditioning systems, the incorporation of green roofs and urban greening, and energy planning and monitoring.

- 8.4.10. Climate change is also a focus of Objective 7 (Ensuring Environmental Quality), which seeks to promote the mitigation of, and adaptation to, climate change through requirements for sustainable design and construction; green infrastructure provision; reduced carbon emissions; the management of flood risk; and conservation of resources.
- 8.4.11. Overall, the draft Local Plan is predicted to lead to broadly **neutral effects** with regard to climate change mitigation. The policy framework seeks to ensure that future development is associated with low embodied carbon emissions 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. Due to this, **minor positive effects** are considered likely with regard to climate change adaptation.

Table 8.3 Likely effects – climate change

Likely effects	Effect dimensions	Recommendations / mitigation
Limitation in GHG emissions resulting from growth through reducing the need to travel and promoting modal shift.	Direct and indirect, long-term, and positive.	None proposed.
Reduction in per capita emissions.	Direct and indirect, long-term, and positive.	None proposed.
Enhancements to the resilience of the borough to the effects of climate change.	Direct and indirect, short, medium, and long-term, and positive.	None proposed.

8.5. Equalities, community, and wellbeing

- 8.5.1. According to the overall Index of Multiple Deprivation (IMD) (2019), only one Lower layer Super Output Area (LSOA) in Hounslow is amongst the 10% most deprived neighbourhoods in the country. This is **Hounslow 020E**, which falls within Isleworth ward. However, there are eleven LSOAs amongst the 20% most deprived neighbourhoods in the country, these are found within the wards of Brentford, Heston West, Syon, Isleworth, Cranford, Bedfont, Feltham West, Hanworth, and Hanworth Park.
- 8.5.2. In light of the above, the spatial strategy of the draft Local Plan distributes growth relatively evenly across Hounslow. This is likely to benefit those groups with ‘protected characteristics’ by ensuring that the benefits associated with growth are delivered across the entire borough, including those areas which currently experience the highest levels of deprivation.
- 8.5.3. Good accessibility to services and facilities is central to the quality of life of residents, for sustaining vital communities and improving health and wellbeing, in addition to reducing noise and air pollution, carbon emissions and traffic congestion related to heavy dependence on car travel. In this context, the draft Local Plan has a strong focus on enhancing sustainable transport networks across the borough, and the focus of this is Policy EC2 (Developing Sustainable Transport Network).
- 8.5.4. Community infrastructure is primarily addressed through Policy CI1 of the draft Local Plan, which seeks to ensure that existing community facilities continue to be used for the benefit of the community where they are still providing the intended community service. The policy also promotes the delivery of new and enhanced community facilities in areas of growth.
- 8.5.5. Whilst discussed in detail under the housing IIA topic below, it is noted that the plan seeks to deliver a range of housing tenures, types and sizes that deliver mixed and inclusive communities and provide a range of unit sizes for market and affordable housing in proportions that reflecting a demonstrated local need. This will help meet the needs of different groups, including families, young people and older people.
- 8.5.6. Education is addressed through Policy CI2, which outlines the council’s plans to invest in early years’ provision, family support and school improvements, amongst other things. Notably, the policy aims to improve SEND provision, which will make schools more inclusive. This is likely to

benefit those groups with 'protected characteristics' as access to high-quality education often correlates to better employment prospects in adulthood.

- 8.5.7. Whilst discussed in detail under the economy and employment IIA topic below, employment growth in the borough is likely to benefit those groups with 'protected characteristics' through increasing the range of job opportunities available to existing residents. This should benefit those who are of working age or are approaching working age. The creation of new jobs will also lead to the increase of skills training for the local population.
- 8.5.8. Policy CI3 (Health Facilities and Healthy Places) supports the delivery of new health facilities in areas of need and the improvement and modernisation of existing health facilities. The policy expects development proposals to contribute to the health and wellbeing of the local community by incorporating Active Design Principles to create healthier places.
- 8.5.9. Policy CI4 (Culture and Leisure Facilities) seeks to promote, safeguard, and improve leisure, recreation, arts, and cultural facilities in the borough where they meet local and wider needs. It also supports the delivery of new cultural infrastructure and leisure facilities and expects development proposals to locate leisure and cultural facilities in accessible places and ensure they are designed to enable access to all potential users.
- 8.5.10. More broadly, Policy GB8 (Allotments, Agriculture and Local Food Growing) seeks to retain existing allotments, whilst Policy GB9 (Playspace, Outdoor Sports Facilities and Burial Space) promotes the provision of high-quality play and informal recreation spaces that cater for a range of age groups and help meet the needs of the borough's growing child population. Finally, Policy GB9 supports high-quality sports facilities to meet demands for a range of sports and active pursuits across the borough.
- 8.5.11. The draft Local Plan also has a strong focus on green and blue infrastructure enhancements across the borough through Policy GB4 (The Green Infrastructure Network). These enhancements will have significant benefits for the quality of life of residents, and for health and wellbeing, including through improving leisure and recreational opportunities, promoting active lifestyles, supporting improvements to air and noise quality, and enhancing the satisfaction of residents with the neighbourhoods as a place to live.
- 8.5.12. Overall, the draft Local Plan is considered likely to lead to long-term **significant positive effects**. 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. This is important given that growth will ultimately lead to a strain on existing facilities, particularly schools and health facilities.

Table 8.4 Likely effects – equalities, community, and wellbeing

Likely effects	Effect dimensions	Recommendations / mitigation
Increased use of sustainable transport modes, including public transport and walking and cycling.	Direct and indirect, long-term, and positive overall.	None proposed.
Improved access to services, facilities, and employment opportunities, including for those with protected characteristics.	Direct and indirect, long-term, and positive overall.	None proposed.
Enhancements to the quality and liveability of existing neighbourhoods.	Direct and indirect, long-term, and positive overall.	None proposed.
Delivery of a high-quality townscape which meets the needs of all equalities groups, including of all genders, those with disabilities, and those groups who may feel more vulnerable from a poorly designed and less secure public realm.	Direct and indirect, long-term, and positive overall.	None proposed.
Delivery of housing of a range of types and tenures appropriate for a range of groups, including older people, younger people with families and those with disabilities.	Direct, long-term, and positive overall.	None proposed.
Improvements to health and wellbeing from a high-quality public realm, improvements to green infrastructure networks, enhanced walking and cycling linkages and limiting exposures to air and noise pollution.	Direct and indirect, long-term, and positive overall.	None proposed.

8.6. Cultural heritage and landscape

8.6.1. Hounslow overlaps with the buffer zone of the Royal Botanic Gardens, Kew World Heritage Site (WHS), which is located 35m from the borough in neighbouring borough Richmond upon Thames. Only one of the site allocations fall within the buffer zone: **Site 96 (Europa House)**. Whilst this site is previously developed land that is currently in use, the site's impact on the setting of the WHS will be largely dependent on the design and layout of development, which is unknown at this stage.

8.6.2. Hounslow contains 517 listed buildings (32 grade I, 29 grade II* and 456 grade II). The following sites contain a listed building(s):

- **Site 3 (Gillette Factory)** contains grade II listed 'Front block and return wings of main Gillette building' and 'Four lamp standards with lanterns outside the main entrance to the Gillette Factory on the corner of Syon Lane (Great West Road)'.
- **Site 64 (MOD Feltham)** contains grade II listed 'Feltham House'.
- **Site 72 (St. Catherine's House and Car Park)** contains grade II listed 'Tower and spire of former Church of St Catherine'.
- **Site 74 (Hounslow West Station)** contains grade II listed 'Ticket hall and shops at Hounslow West Underground Station'.
- **Site 84 (Hounslow Cavalry Barracks)** contains eleven grade II listed buildings associated with the Hounslow Cavalry Barracks.

- **Site 98 (Osterley Station Car Park)** contains grade II listed 'Osterley London regional transport station (including platforms)'.
- **Site 113 (69-77 Boston Manor Road)** contains grade II listed '73 and 75, Boston Manor Road', 'Nos. 69 and 71, Boston Manor Road' and 'Prospect House'.

8.6.3. Hence, these site allocations have the potential to impact the integrity of a listed building. However, this is largely dependent on the design and layout of development, which is unknown at this stage, as well as the existing condition of the listed building as development has the potential to improve the condition of buildings which may currently be in poor condition. It is also recognised that many sites have the potential to impact the setting of listed buildings in their vicinity, particularly when considering the development of tall buildings.

8.6.4. Hounslow contains six scheduled monuments, however none of the site allocations are within 50m of a scheduled monument. Therefore, the site allocations are unlikely to disturb archaeological remains associated with nearby scheduled monuments.

8.6.5. Hounslow contains six registered parks and gardens (two grade I, two grade II* and two grade II). The following sites are within proximity (<50m) of a registered park and garden:

- **Site 29 (EMC Tower)**, which is adjacent to grade II* listed 'Gunnersbury Park'.
- **Site 30 (Vantage West)**, which is adjacent to grade II* listed 'Gunnersbury Park'.
- **Site 103 (West Middlesex Hospital)**, which is ~10m southwest of grade I listed 'Syon Park'.
- **Site 27 (Kew Bridge Distribution Centre)**, which is ~40m south of grade II* listed 'Gunnersbury Park'.
- **Site 28 (27 Great West Road)**, which is ~40m south of grade II* listed 'Gunnersbury Park'.

8.6.6. Hence, these site allocations have the potential to impact the setting of a registered park and garden. However, these sites are all previously developed land that is currently in use, and therefore a change of use to housing is unlikely to result in a significant change to the baseline. Nevertheless, this is largely dependent on the design and layout of development, which is unknown at this stage.

8.6.7. There are also 28 conservation areas in Hounslow. Since 2016, conservation area appraisals or updated conservation area appraisals have been prepared for all of the conservation areas in the borough. The following sites fall within, or are adjacent to, a conservation area:

- **Site 59 (Tesco Feltham)** falls within Feltham Town Centre Conservation Area.
- **Site 116 (1 Burlington Lane)** falls within Chiswick House Conservation Area.

- **Site 72 (St. Catherine's House and Car Park)** falls within Feltham Town Centre Conservation Area.
- **Site 84 (Hounslow Cavalry Barracks)** falls within Hounslow Cavalry Barracks Conservation Area.
- **Site 100 (Osterley Park Hotel)** falls within Osterley Park Conservation Area.
- **Site 101 (Brentford Group Practice)** falls within St Paul's, Brentford Conservation Area.
- **Site 105 (Chiswick Telephone Exchange)** falls within Turnham Green Conservation Area.
- **Site 106 (Royal Mail, Chiswick Delivery Office)** falls within Turnham Green Conservation Area.
- **Site 111 (Brentford Policy Station)** falls within St Paul's, Brentford Conservation Area.
- **Site 116 (1 Burlington Lane)** falls within Chiswick House Conservation Area.
- **Site 25 (Layton Road Car Park)** is adjacent to St Paul's, Brentford Conservation Area.
- **Site 62 (Manor Park, Feltham)** is adjacent to Feltham Town Centre Conservation Area.
- **Site 64 (Mod Feltham)** is adjacent to Feltham Town Centre Conservation Area.
- **Site 74 (Hounslow West Station)** is adjacent to St Paul's Church Conservation Area.
- **Site 77 (Land south of Western International Market)** is adjacent to Cranford Village Conservation Area.
- **Site 96 (Europe House)** is adjacent to Isleworth Riverside Conservation Area.
- **Site 99 (Feltham Coachworks)** is adjacent to Spring Grove Conservation Area.
- **Site 103 (West Middlesex Hospital)** is adjacent to Isleworth Riverside Conservation Area.
- **Site 107 (Sainsbury's Chiswick)** is adjacent to Turnham Green Conservation Area.
- **Site 118 (Former GSK Site)** is adjacent to the Grand Union Canal and Boston Manor Conservation Area.
- **Site 122 (Rectory Farm)** is adjacent to Cranford Village Conservation Area.

8.6.8. In light of the above, a significant number of the site allocations have the potential to impact the setting of a conservation area. However, these sites are all previously developed land that is currently in use, and therefore a change of use to housing is unlikely to result in a significant change to the

baseline. They also in many cases have the potential to enhance the setting of the conservation area. Nevertheless, this is largely dependent on the design and layout of development, which is unknown at this stage. In this respect, Policy CC4 (Heritage) of the draft Local Plan outlines that any development within or affecting a conservation area must conserve and take opportunities to enhance the character of the area, and respect the grain, scale, form, proportions and materials of the surrounding area and existing architecture.

8.6.9. A Certificate of Immunity (COI) prevents a building from being listed for five years. It is a useful mechanism for ascertaining the listed status of a building and can help inform development proposals for a site. Hounslow contains one building with a COI. This is 'Homebase, Brentford', however the COI expires on 2nd December 2024. **Site 9 (Syon Lane Industrial Estate)** is ~30m northeast of Homebase, Brentford.

8.6.10. Hounslow contains 19 buildings and structures, one place of worship, two archaeology sites, one park and garden, and two conservation areas listed on Historic England's Heritage at Risk Register 2023.¹³ The following site allocations contain, or fall within, one or more of these entries:

- **Site 84 (Hounslow Cavalry Barracks)** contains grade II listed building 'The keep (armoury) to Hounslow Cavalry Barracks, Beavers Lane, Hounslow', which is in 'very bad' condition.
- **Site 29 (EMC Tower)** is adjacent to grade II* listed 'Gunnersbury Park', which is 'generally satisfactory but with significant localised problems'.
- **Site 30 (Vantage West)** is adjacent to grade II* listed 'Gunnersbury Park', which is 'generally satisfactory but with significant localised problems'.
- **Site 27 (Kew Bridge Distribution Centre)** is ~40m south of grade II* listed 'Gunnersbury Park', which is 'generally satisfactory but with significant localised problems'.
- **Site 28 (27 Great West Road)** is ~40m south of grade II* listed 'Gunnersbury Park', which is 'generally satisfactory but with significant localised problems'.
- **Site 35 (B&Q Chiswick)** is ~220m southeast of grade II* listed 'Gunnersbury Park', which is 'generally satisfactory but with significant localised problems'.
- **Site 36 (110 Power Road)** is ~240m southeast of grade II* listed 'Gunnersbury Park', which is 'generally satisfactory but with significant localised problems'.
- **Site 118 (Former GSK Site)** is adjacent to the Grand Union Canal and Boston Manor Conservation Area, which is in 'very bad' condition.

8.6.11. Heritage is primarily addressed through Policy CC4, which seeks to conserve both designated and non-designated heritage assets within the borough. It also promotes heritage-led regeneration and the appropriate re-use of vacant or underused historic buildings, heritage assets and settings, as well as the conservation of views. Notably, it is proposed that the council

¹³ Historic England (2023): 'Heritage at Risk – London & South East Register 2023', [online] available to access via [this link](#)

work with the WHS, the London Borough of Richmond and Historic England to conserve and enhance the outstanding universal value of the WHS. This includes its buffer zone and its setting, including views to and from this asset.

- 8.6.12. With regard to archaeology, Policy CC4 expects development proposals to submit an Archaeological Evaluation Report if the proposal falls within or adjacent to an Archaeological Priority Area, with advice on the appropriate mitigation measures in the cases where excavation is justified.
- 8.6.13. In addition, Policy CC1 (Context and Character) expects development proposals to have due regard to the Hounslow Characterisation and Growth Study and Character, Sustainability and Design Codes SPD or any subsequent update. Development must also demonstrate, amongst other things, how the proposal understands and responds to the wider context and history of the area; conserves and takes opportunities to enhance particular features or qualities that contribute to an area's character; and respects and enhances the area's distinctive character and historic environment.
- 8.6.14. Whilst not a landscape designation, a significant proportion of Hounslow overlaps with areas of the London Green Belt. The following site allocations are within the Green Belt:
- **Site 44 (Central Park Trading Estate)** is within the Green Belt; it was assessed in the Green Belt Review Stage 2 and is proposed to be released from the Green Belt.
 - **Site 46 (Ron Smith Recycling, Green Lane)** is within the Green Belt; it was assessed in the Green Belt Review Stage 2 and is proposed to be released from the Green Belt.
 - **Site 48 (Vacant Land at Dick Turpin Way)** is within the Green Belt; it was assessed in the Green Belt Review Stage 2 and is proposed to be released from the Green Belt.
 - **Site 49 (Site at Faggs Road)** is partially within the Green Belt; it was assessed in the Green Belt Review Stage 2 and is proposed to be released from the Green Belt.
 - **Site 57 (Airport Business Park)** is within the Green Belt; it was assessed in the Green Belt Review Stage 2 and part of the site (19.3ha) is proposed to be released from the Green Belt.
 - **Site 77 (Land south of Western International Market)** is within the Green Belt; it was assessed in the Green Belt Review Stage 2 and is proposed to be released from the Green Belt.
 - **Site 120 (Land north of Church Road, Cranford)** is within the Green Belt; it was assessed in the Green Belt Review Stages 1 and 2 and is proposed to be inset from the Green Belt to meet the specialist housing needs of Gypsies and Travellers in Hounslow.
 - **Site 121 (Land south of Bedfont Road)** is within the Green Belt; it was assessed in the Green Belt Review Stages 1 and 2 and is proposed to be inset from the Green Belt to meet the specialist housing needs of Gypsies and Travellers in Hounslow.

In addition:

- **Site 122 (Rectory Farm)** is within the Green Belt and was assessed in the Green Belt Review Stages 1 and 2. Whilst the site is not proposed to be released from the Green Belt for housing, the site is allocated for minerals extraction followed by restoration to parkland.
- **Site 45 (Land at Green Lane)** is a greenfield site currently adjoining Green Belt land comprising Local Open Space.
- **Site 119 (Convent Way Estate)** contains Green Belt land but does not propose Green Belt release to facilitate the housing estate regeneration proposed here. The Green Belt portion of the site is included for open space improvements.

8.6.15. In response to the above, Policy GB1 (Green Belt and Metropolitan Open Land) outlines the council’s plan to establish a Green Belt boundary and the extent of Metropolitan Open Land in line with the Mayor of London’s designation. It also seeks to protect Green Belt and Metropolitan Open Land by ensuring that any development is not inappropriate. The policy also sets out requirements for compensatory improvements in terms of improving access and environmental quality as per the provisions of the NPPF. This will help mitigate impacts on landscape character and support enhancements.

8.6.16. More broadly, Policy CC2 (Urban Design and Architecture) expects development proposals to understand, integrate, protect and enhance, restore or introduce natural landscape, and create green and amenity spaces. In addition, Policy GB2 (Open Space) designates and protects Local Open Space (LOS), addressing deficiencies in quality, quantity and access. It also aims to maintain the supply of LOS to meet the needs of the borough’s growing population. Moreover, Policy GB4 identifies and protects the existing green infrastructure network. The policy expects development proposals to make a positive contribution to the green infrastructure network and retain mature trees where possible. Finally, Policy GB5 (Blue Ribbon Network) seeks to protect the borough’s blue infrastructure network.

8.6.17. Importantly, in line with the requirements of the London Plan, the HLP also identifies areas that would be appropriate for tall buildings, supported by detailed evidence base work around this.

8.6.18. Overall, 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. Due to this, **uncertainty** is noted under this IIA topic. Nevertheless, it is recognised that the policy framework seeks to mitigate adverse impacts on heritage assets and landscape character as a result of development and secure enhancements.

Table 8.5 Likely effects – cultural heritage and landscape

Likely effects	Effect dimensions	Recommendations / mitigation
Enhanced townscape character, public realm, and local distinctiveness.	Direct and indirect, long-term, and positive	None proposed.

Likely effects	Effect dimensions	Recommendations / mitigation
Protection and enhancement of heritage assets, including repair and reuse where appropriate.	Direct, long-term, and positive.	None proposed.
Revitalisation of features and areas of historic environment value in the borough.	Direct and indirect, long-term, and positive.	None proposed.
Increase understanding and awareness of the borough's historic environment resource.	Direct and indirect, long-term, and positive.	None proposed.
Loss of greenfield land.	Direct, long-term, and negative.	Mitigation can include sensitive design, requirement to provide open spaces in allocations, compensatory improvements to remaining Green Belt land and other elements.

8.7. Economy and employment

- 8.7.1. In Hounslow 5.2% of people aged 16 years and over are economically inactive and unemployed, which is higher than the national average (3.5%). The most prevalent occupation in Hounslow is professional (20%), which is in line with the national average (20.3%). This is followed by elementary occupations (13.4%), managers, directors and senior officials (12.9%) and associate professional and technical occupations (12.7%).
- 8.7.2. In response to this, Objective 2 (Promoting Economic Growth and Inward Investment) of the draft Local Plan aims to encourage inward investment and facilitate job growth; create an environment conducive to entrepreneurs; provide a mix of employment spaces; support and encourage economic development; and foster an environment where existing, new, innovative, cultural and creative enterprises can prosper.
- 8.7.3. Existing key office locations in Hounslow are located in Bedfont, Feltham, Hounslow, Brentford, Great West Road, and Chiswick. Locally Significant Industrial Sites (LSISs) are more widespread and are generally located out of town on the settlement edge.
- 8.7.4. With regard to the Great West Corridor, Policy P1 of the draft Local Plan supports proposals for the intensification of designated and undesignated employment sites for uses suitable for broad industrial type activities as defined in the new draft London Plan policy and/or guidance. This is in addition to the net additional floorspace proposed during the plan period.
- 8.7.5. The plan commits to supporting the local economy and creative industries by delivering a range of high-quality workspaces and seeking a proportion of affordable workspaces for start-ups, small and medium-sized enterprises. This is in addition to promoting the growth and expansion of further and higher education, such as the University of West London, to improve skills and act as a driver of growth and enterprise in the local economy.
- 8.7.6. With regard to the West of the Borough, the plan allocates land for at least 114,500 sqm net additional industrial floorspace within key locations as identified in the site allocations, and places policies including new Locally

Significant Employment Sites at Hatton Cross (Land at Hatton Road and vacant land at Dick Turpin Way) and adjacent to the Western International Market site at Cranford and an extension to the North Feltham Trading Estate.

- 8.7.7. Policy P4 allocates Land at Hatton Fields for the delivery of a logistics and industrial business park comprising 63,450 sqm floorspace to the north of the site, combining modern warehousing with high quality infrastructure.
- 8.7.8. More broadly, Policy TC2 (Ensuring the Future Vitality of Town Centres) seeks to maintain Chiswick town centre’s diverse roles in terms of shopping, the evening economy and business activity. Heathrow Airport is addressed through Policy EC3, which expects development proposals to have a positive impact on the local economy. This is important given the airport plays a major role in the local economy, employing more than 11,000 of the borough’s workforce and many others indirectly.
- 8.7.9. Overall, the draft Local Plan is considered likely to lead to long-term **significant positive effects**. 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.

Table 8.6 Likely effects – economy and employment

Likely effects	Effect dimensions	Recommendations / mitigation
Facilitating the growth and expansion of existing businesses and the encouragement of new businesses to locate in the borough through appropriate employment land provision.	Direct, long-term, and positive.	None proposed.
Enabling the economic opportunities realised by proximity to Heathrow to be realised in the borough.	Direct, indirect, long-term, and positive.	None proposed.
Promoting the economic vitality of key centres in the area, including Feltham town centre.	Direct, indirect, long-term, and positive.	None proposed.
Diversification of the borough’s economy.	Direct, indirect, long-term, and positive.	None proposed.
Support for business start-ups and SMEs.	Direct, indirect, long-term, and positive.	None proposed.

8.8. Housing

- 8.8.1. In Hounslow, the population size has increased by 13.5% from around 254,000 in 2011 to 288,200 in 2021. This is higher than the overall increase for England (6.6%) and London (7.7%) during this time period. Notably, Hounslow has experienced the fifth highest increase in population of the local authority areas in London between 2011 and 2021.
- 8.8.2. In order to meet the identified housing needs and deliver the borough’s London Plan set housing target, Policy SC1 (Increasing Housing Supply) outlines that the council aims to deliver a minimum of 28,840 homes by 2041. This includes the delivery of at least 7,500 new homes in the Great West Corridor Opportunity Area and at least 6,500 new homes in the part of

the Heathrow Opportunity Area within the West of the Borough. Therefore, the draft Local Plan performs well by meeting the identified housing need of the borough.

- 8.8.3. The most common household size in Hounslow is four or more people (30.1%), which is significantly higher than the national average (19.9%). In addition, the most prevalent number of bedrooms of households in Hounslow is three (31.9%), which is significantly lower than the national average (40%). In response to this, Policy SC3 (Meeting the Need for a Mix of Housing Size and Type) seeks a mix of new housing to meet evidenced local need, based on the latest and/or most specific available evidence, and applying the general housing need mix requirements set out in the latest Local Housing Needs Assessment (LHNA).
- 8.8.4. The majority of households in Hounslow rent privately or live rent free (31.2%), which is significantly higher than the national average (20.6%). In response to this, Policy SC11 (Other Forms of Housing) supports Build to Rent accommodation subject to meeting the criteria for Build to Rent proposals in this policy and other relevant policies in the plan.
- 8.8.5. In 2023, the ratio of median house price to median gross annual workplace-based earnings in Hounslow was 12.74. This means that full-time employees could typically expect to spend around 12.74 times their workplace-based annual earnings on purchasing a home. This is higher than the ratio for England in the same year, which stood at 8.26, as well as the ratio for London, which stood at 11.95. In response to this, affordable housing is addressed through Policy SC2 (Maximising the Provision of Affordable Housing), which seeks the maximum reasonable amount of affordable housing to be negotiated on a site-by-site basis on all sites with a capacity to provide ten or more homes (gross) with reference to the strategic target of 50% affordable housing.
- 8.8.6. Also of relevance is Policy SC4 (Scale and Density of New Housing Development), which seeks to ensure the scale and density of new housing development is appropriate, and Policy SC5 (Ensuring Suitable Internal and External Space), which seeks to ensure new housing development contributes to achieving excellent quality and design of housing in the borough.
- 8.8.7. In Hounslow there has been an increase of 26.6% in people aged 65 years and over; an increase of 11.1% in people aged 15 to 64 years; and an increase of 15.3% in children aged under 15 years between 2011 and 2021. Hence, the borough is experiencing an aging population. In response to this, Policy SC8 supports the provision of suitable and well-designed purpose-built specialist older persons housing to contribute to meeting the borough's identified need for 73 additional specialist older persons homes per annum over the plan period. It also seeks to address the need for 17 care and nursing home bedspaces per annum in the borough.
- 8.8.8. Finally, the needs of gypsies and travellers and travelling showpeople are addressed under Policy SC9, which sets out the identified specialist housing needs of both communities over the plan period, and the borough's approach to meeting a significant proportion of this specialist housing needs over the plan period.

8.8.9. Overall, the draft Local Plan is considered likely to lead to long-term **significant positive effects**. 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.

Table 8.7 Likely effects – housing

Likely effects	Effect dimensions	Recommendations / mitigation
Delivery of housing of a range of types and tenures, taking full account of housing need.	Direct, long-term, and positive overall.	None proposed.
Delivery of high quality and well-located affordable housing.	Direct, long-term, and positive overall.	None proposed.
Delivery of flexible and accessible homes appropriate for a wide range of groups, including those with 'protected characteristics'.	Direct, long-term, and positive overall.	None proposed.
Delivery of high-quality residential neighbourhoods.	Direct and indirect, long-term, and positive overall.	None proposed.
Delivery of high-quality pitches and plots for Gypsies, Travellers and Travelling Showpeople.	Direct, long-term, and positive overall.	None proposed.

8.9. Soil contamination and sustainable land use

8.9.1. The majority of Hounslow is in urban or non-agricultural use. However, according to Natural England's Agricultural Land Classification (ALC)¹⁴ there are some small areas in the borough that are underlain by Grade 1 ('excellent') agricultural land. In response to this, Policy GB8 (Allotments, Agriculture and Local Food Growing) seeks to protect Best and Most Versatile (BMV) agricultural land in line with the NPPF.

8.9.2. As highlighted in the 2021/22 Annual Monitoring Report¹⁵, the total land take from inappropriate development on land designated Green Belt and Metropolitan Open Land over the last 5 years is 2.18 ha. As noted under the cultural heritage and landscape IIA topic above, 13 of the site allocations are either within or adjoining the Green Belt. Policy GB1 (Green Belt and Metropolitan Open Land) outlines the council's plan to establish a Green Belt boundary and the extent of Metropolitan Open Land in line with the Mayor of London's designation. It also seeks to protect Green Belt and Metropolitan Open Land by ensuring that any development is not inappropriate.

8.9.3. The following sites are either entirely or partially greenfield land:

- **Site 45 (Land at Green Lane)**, which is entirely greenfield.
- **Site 48 (Vacant Land at Dick Turpin Way)**, which is entirely greenfield.
- **Site 49 (Site at Faggs Road)**, which is a mix of greenfield and previously developed land.

¹⁴ Natural England (2010): 'Agricultural Land Classification map London and the South East (ALC007)', [online] available to access via [this link](#)

¹⁵ LBH (2021): 'Hounslow's Local Plan Authority Monitoring Report 2021/22', [online] available to access via [this link](#)

- **Site 57 (Land at Hatton Fields)**, which is entirely greenfield.
- **Site 73 (Land at Nene Gardens)**, which is entirely greenfield.
- **Site 77 (Land south of Western International Market)**, which is entirely greenfield.
- **Site 89 (Land at James Street)**, which is entirely greenfield.
- **Site 120 (Land north of Church Road, Cranford)**, which is entirely greenfield.
- **Site 121 (Land south of Bedfont Road)**, which is entirely greenfield.
- **Site 122 (Rectory Farm)**, which is entirely greenfield.
- **Site 64 (MOD Feltham)**, which is a mix of greenfield and previously developed land.
- **Site 84 (Hounslow Cavalry Barracks)**, which is a mix of greenfield and previously developed land.
- **Site 119 (Convent Way Estate)**, which is a mix of greenfield and previously developed land.

- 8.9.4. In this respect, the spatial strategy of the draft Local Plan will result in the loss of some greenfield land. Nevertheless, it is recognised that this is largely unavoidable to meet the identified development needs, including most notably the borough's employment land need, as well as its housing need, and need for sites for extraction of minerals. In addition, the majority of site allocations made within the draft Local Plan are on previously developed land, and therefore the plan performs well in this respect. While allocations for strategic sites such as MOD Feltham and Hounslow Cavalry Barracks require delivery of open space, so it is not expected that there would be significant changes to the amount of greenfield land affected in these locations. Furthermore, Rectory Farm is allocated for temporary minerals extraction to help meet Hounslow's London Plan minerals apportionment (as per Policy EQ10 of the HLP), followed by the site's restoration to parkland within the Green Belt (meaning there will be no long-term loss of greenfield land at Rectory Farm).
- 8.9.5. A substantial amount of land in Hounslow is at risk of being contaminated as the borough has an extensive industrial history. Factories, landfill sites, gas works and the military have all operated in Hounslow and these industries have sometimes polluted the land where they operated. This pollution, or contamination, where present has the potential to harm human health, water supplies, natural habitats and property.
- 8.9.6. In response to the above, Policy EQ8 (Contamination) promotes the remediation of contaminated or potentially contaminated land, and the improvement of land conditions and water quality in all areas. It expects development proposals to effectively treat, contain, or control any contamination. Developers will be required to provide Preliminary Risk Assessments (PRAs) where contaminated land is suspected.
- 8.9.7. In addition, Policy EQ9 (Hazardous Substances) expects development proposals to ensure that proposals involving hazardous substances do not cause potential health and safety risks to neighbouring uses.

8.9.8. Overall, the draft Local Plan is predicted to lead to **minor negative effects**. 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 development needs, in particular employment land, for the borough as Hounslow is largely built-up. In addition, the policy framework appropriately addresses soil contamination and seeks to mitigate this where possible.

Table 8.8 Likely effects – soil contamination and sustainable land use

Likely effects	Effect dimensions	Recommendations / mitigation
Loss of previously undeveloped greenfield land.	Direct, permanent, and negative.	None proposed: plan sets out a range of provisions for enhancing the quality of such land, including through compensatory measures.
Efficient use of land through a significant intensification of land uses and a focus on the use of previously developed land.	Direct, long-term, and positive.	None proposed.
Remediation of land contamination.	Direct, long-term, and positive.	None proposed.

8.10. Water quality and water resources

8.10.1. Thames Water is the borough’s water provider. Their revised draft Water Resources Management Plan 2024 (WRMP24)¹⁶ outlines that the London Water Resource Zone (WRZ), which Hounslow falls within, is a large, conjunctive use zone, involving both surface water and groundwater abstraction. The vulnerability assessment shows that the London WRZ has a high vulnerability to the impacts of climate change.

8.10.2. Growth in the borough will ultimately lead to an increased strain on water resources. However, the council will be required to work with water companies, and adhere to national policy, which will likely ensure that water resources are suitably upgraded to accommodate any new development.

8.10.3. According to the Environment Agency’s Catchment Data Explorer¹⁷, the Lower Brent Water Body has as ‘moderate’ ecological status. The stated reasons for not achieving ‘good’ status are diffuse source pollution from urbanisation and contaminated waterbody bed sediments and point source pollution from intermittent sewage discharge and misconnections. A further stated reason relates to the physical modification of watercourses.

8.10.4. The other waterbody in the borough, the Crane Water Body, has a ‘moderate’ ecological status. The stated reasons for not achieving ‘good’ status are diffuse source pollution from urbanisation and Heathrow Airport and point source pollution from continuous and intermittent sewage discharge, incidents and misconnections. A further stated reason relates to physical modification of the watercourses.

¹⁶ Thames Water (2024): ‘Revised Draft Water Resources Management Plan 2024’, [online] available to access via [this link](#)

¹⁷ Environment Agency (2024): ‘Lower Brent Water Body’, [online] available to access via [this link](#)

- 8.10.5. In response to the above, Policy GB5 seeks to protect and enhance the borough’s Blue Ribbon Network by promoting the improvement of water quality in the network, including through the naturalisation of rivers and other appropriate measures consistent with the Thames River Basin Management Plan. This is in addition to working with the Environment Agency and other partners to deliver measures which safeguard and improve watercourses in line with the Water Framework Directive (WFD).
- 8.10.6. With a focus on specific parts of the borough, Policy P2 (Cranford and Heston Neighbourhoods) outlines that proposals should enhance the river corridors and the quality and the condition of watercourses in line with the WFD objectives. Policy P3 (Feltham) requires proposals to improve water quality in line with the WFD, whilst Policy P4 (Land at Hatton Fields) encourages proposals to enhance the river corridors and the quality and condition of watercourses, such as the River Crane, the Duke of Northumberland’s River and the Longford River, in line with the WFD objectives.
- 8.10.7. More broadly, Policy GB6 (Residential Moorings) is in place to ensure that moorings do not cause detriment to water quality.
- 8.10.8. Overall, the draft Local Plan is predicted to lead to broadly **neutral effects**. This is because, whilst growth may increase pressures on water resources, water quality is largely driven by water companies and national policy. Nevertheless, it is recognised that the policy framework provided by the HLP seeks to protect local waterbodies by protecting and enhancing the Blue Ribbon Network.

Table 8.9 Likely effects – water quality and water resources

Likely effects	Effect dimensions	Recommendations / mitigation
Enhancements to water quality from a remediation of contaminated land, the implementation of SuDS and green infrastructure network enhancements.	Direct and indirect, long-term, and positive.	None proposed.

9. Conclusions and recommendations

9.1. Conclusions

- 9.1.1. **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.
- 9.1.2. **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 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.
- 9.1.3. **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.
- 9.1.4. **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.
- 9.1.5. 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.

- 9.1.6. **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.

9.2. Cumulative effects

- 9.2.1. 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.
- 9.2.2. 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.
- 9.2.3. 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
- 9.2.4. 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.
- 9.2.5. 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;¹⁸
- 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.

9.2.6. 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 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.

9.2.7. 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.

¹⁸ 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.

9.3. Recommendations

- 9.3.1. 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.

Part 3: What are the next steps?

10. Next steps and monitoring

10.1. Next steps

- 10.1.1. This IIA Report accompanies the Regulation 19 consultation version of the HLP for subsequent examination.
- 10.1.2. 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).
- 10.1.3. 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.

10.2. Monitoring programme

Monitoring in IIA

- 10.2.1. The SEA Directive states that '*member states shall monitor the significant environmental effects of the implementation of plans and programmes.....in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action*' (Article 10.1). In addition, the Environmental Report (or IIA Report) should provide information on a '*description of the measures envisaged concerning monitoring*' (Annex I (i)). To limit the potential burdens related to monitoring associated with the IIA process, monitoring should be undertaken smartly. For this reason, the proposed monitoring framework should focus on those aspects of the environment that are likely to be negatively impacted upon, where the impact is uncertain or where particular opportunities for improvement might arise.

Proposed monitoring programme

- 10.2.2. **Table 10.1** outlines suggestions for a monitoring programme for measuring the HLP's implementation in relation to the areas where the IIA has identified significant opportunities for an improvement in sustainability performance to arise. It also seeks to monitor where uncertainties relating to the appraisal findings arose and suggests where monitoring is required to help ensure that the benefits of the HLP are achieved through the planning process.
- 10.2.3. 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 LB of Hounslow and its partner organisations, or whose collection is already planned. It should also be noted that monitoring can provide useful information for future plans and programmes, including future reviews of the Local Plan.

Table 10.1: Proposed monitoring programme for the HLP

Focus of monitoring	Indicator	Data source	Suggested frequency
Air quality	<ul style="list-style-type: none"> • Concentrations of NO₂ and PM₁₀ at monitoring locations • Number of days exceeding air quality objectives for NO₂ and PM₁₀ 	LB Hounslow	Daily/ annual
Effect of housing, employment and infrastructure on greenhouse gas emissions.	<ul style="list-style-type: none"> • Percentage of new developments meeting net zero carbon standards as defined in Policy SI2 of the London Plan 	LB Hounslow	Annual
Local and strategic green infrastructure provision	<ul style="list-style-type: none"> • Developments granted planning permission for new green infrastructure assets. • Planning applications granted for loss of TPO trees without replacement. • Compensatory measures delivered. 	LB Hounslow	Annual
Population and distribution of key biodiversity species	<ul style="list-style-type: none"> • Area, condition, and connectivity of target priority habitats. • Population and distribution of priority species. • Developments granted planning permission within designated wildlife sites or Biodiversity Action Plan Priority Habitats. • Compensatory measures delivered. 	LB Hounslow	Annual
Flood risk	<ul style="list-style-type: none"> • Developments granted planning permission contrary to the advice of the Environment Agency in Flood Risk Zones 2 and 3 	LB Hounslow	Annual
Equalities	<ul style="list-style-type: none"> • Developments granted planning permission for new community infrastructure • Changes in deprivation domains and overall Indices of Multiple Deprivation 	LB Hounslow	Annual
Affordable housing delivery	<ul style="list-style-type: none"> • Number of affordable dwellings completed (net), broken down by tenure and type of site. 	LB Hounslow	Annual

Appendices

Appendix A – Regulatory requirements

As discussed in **Chapter 1** of the main report, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the IIA Report; however, interpretation of Schedule 2 is not straightforward. **Tables A, B and C** link the structure of this report to an interpretation of Schedule 2 requirements and explains this interpretation.

Table A: Questions answered by the IIA Report, in accordance with an interpretation of regulatory requirements

Report section	Questions answered	Regulatory requirement met
Introduction	What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan, and relationship with other relevant plans and programmes.
	What is the scope of the IIA?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance. Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Key environmental problems/ issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.
Part 1	What has plan-making/ IIA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach). The likely significant effects associated with alternatives. Outline reasons for selecting the preferred approach in light of the alternatives assessment/ a description of how environmental objectives and considerations are reflected in the Plan.
Part 2	What are the IIA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the Plan. The measures envisaged to prevent, reduce, and offset any significant adverse effects of implementing the Plan.
Part 3	What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged.

Table B: Questions answered by the IIA Report, in accordance with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
1. an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
2. the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'context'?</i>
3. the environmental characteristics of areas likely to be significantly affected;		
4. any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
5. the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
6. the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>
7. the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
8. an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
9. a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Table C: ‘Checklist’ of how (throughout the IIA process) and where regulatory requirements are or will be met.

Regulatory requirement	Discussion of how the requirement is met
Schedule 2 requirements:	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapter 1 (vision and objectives of the HLP) presents this information and an overview of the contents of the plan is provided in Chapter 8. The relationship with other plans and programmes is also set out in the Scoping Report (2016) and Scoping Update (2023).
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report published in 2016. The outcome of scoping was an ‘IIA Framework’, and this is presented within Chapter 3 (‘What’s the scope of the IIA’). More detailed messages from the Scoping Report - i.e., messages established through context and baseline review - are presented within Chapter 2.
3. The environmental characteristics of areas likely to be significantly affected.	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	
5. The environmental protection objectives established at international, national, or community level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	The Scoping Report (2016) presents a detailed context review and explains how key messages from the context review (and baseline review) were then refined to establish an ‘IIA framework’. The scoping information is presented in Chapter 2 and includes any relevant updates. The context review informed the development of the IIA framework and topics, presented in Chapter 2, which provide a methodological ‘framework’ for appraisal. With regard to explaining “how... considerations have been taken into account” - <ul style="list-style-type: none"> • Chapter 4 explains how reasonable alternatives were established in-light of available evidence. • Chapter 5 sets out the detailed appraisal of borough-wide spatial options for housing and employment growth. • Chapter 6 explains the Council’s ‘reasons for supporting the preferred approach’, i.e., explains how/ why the preferred approach is justified in-light of alternatives appraisal (and other factors). • Chapter 8 sets out the findings of the appraisal of the draft plan and Chapter 9 provides a summary of the findings and any recommendations.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets,	<ul style="list-style-type: none"> • Chapter 4 explains how reasonable alternatives were established in-light of available evidence. • Chapter 5 sets out the detailed appraisal of borough-wide spatial options for housing and employment growth.

Regulatory requirement

Discussion of how the requirement is met

cultural heritage including architectural and archaeological heritage, landscape, and the interrelationship between the above factors. (Footnote: these effects should include secondary, cumulative, synergistic, short-, medium-, and long-term, permanent and temporary, positive and negative effects).

- Chapter 8 sets out the findings of the appraisal of the draft plan and Chapter 9 provides a summary of the findings and any recommendations.

As explained within the various methodology sections, as part of appraisal work, consideration has been given to the IIA scope, and the need to consider the potential for various effect characteristics/ dimensions.

7. The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.

Where necessary, mitigation measures are identified within the alternatives appraisal (in Chapter 6) and appraisal of the Draft Local Plan (Chapters 8 and 9).

8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

Chapter 4 deals with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues/ options.

Also, Chapter 6 explains the Council's 'reasons for selecting the preferred option' (in light of alternatives appraisal). Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations/ assumptions are also discussed as part of appraisal narratives.

9. A description of the measures envisaged concerning monitoring in accordance with Article 10.

Suggested monitoring measures are detailed in Chapter 10. It is also anticipated that monitoring measures will be detailed in the SA Adoption Statement.

10. A Non-Technical Summary of the information provided under the above headings.

A Non-Technical Summary (NTS) is provided separately.

The IIA Report must be published alongside the Draft Plan, in accordance with the following regulations: Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying IIA Report before the adoption of the plan or programme (Art. 6.1 and 6.2).

At the current time, this IIA Report is being published alongside the Regulation 19 Local Plan for public consultation.

The IIA Report must be taken into account, alongside consultation responses, when finalising the Plan. The IIA Report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6, and the results of any transboundary consultations entered into pursuant to Article 7, shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

The Council will take into account this IIA Report and consultation responses when preparing the Local Plan for submission.

