



**London Borough  
of Hounslow**

**Hounslow Local Plan 2020-2041  
Duty to Cooperate Statement**

**June 2025**

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# Duty to Cooperate Statement: Hounslow Local Plan 2020-2041

## 1. Introduction

- 1.1. This statement sets out how LB Hounslow has complied with the duty to cooperate in the preparation of the proposed submission version of the Hounslow Local Plan 2020-2041. As such, the statement focuses on duty to cooperate engagement at the following stages:
- activity undertaken at Regulation 18 stage (when the draft Local Plan was referred to as the 'Hounslow Single Local Plan')
  - activity undertaken at Regulation 19 consultation stage (on the proposed submission version of the 'Hounslow Local Plan 2020-2041') and the post-Regulation 19 period in the run up to submission.
- 1.2. This document briefly sets out the legislative requirements before providing an overview of how LB Hounslow has worked with our duty to cooperate partners in order to identify and address strategic cross-boundary matters to date, as well as setting out the next steps for engagement with each party.
- 1.3. The document also signposts to any statements of common ground (SoCG) that have been completed with duty to cooperate partners, and provides update on those SoCG which are still in the process of being agreed with parties ahead of the examination hearings.

## 2. Maintaining Effective Cooperation and the Duty to Cooperate

### *Planning and Compulsory Purchase Act 2004*

- 2.1. Section 110 of the Localism Act inserted section 33A into the Planning and Compulsory Purchase Act 2004 ("PCPA 2004") imposes a duty on local planning authorities and a range of "prescribed bodies" in England to engage constructively, actively and on an on-going basis with each other to maximise the effectiveness with which a range of strategic planning activities are undertaken.
- 2.2. The duty under section 33A(3) applies to the preparation of development plan documents - and activities which can reasonably be considered to prepare the way for, and which support, the preparation of development plan documents - in so far as they relate to a strategic matter. "Strategic matters" are defined in section 33A(4) of the 2004 Act as being:

*"... sustainable development of land that has or would have a significant impact on at least two planning areas including (in particular) sustainable development*

*or use of land for or in connection with infrastructure that would have a significant impact on at least two planning areas”*

- 2.3. Section 33A(6) sets out particular examples of what the requirement to engage might include when considering whether to consult on and prepare, and enter into and publish, agreements on joint approaches to the defined activities, and whether it is appropriate to agree to prepare joint local development documents.
- 2.4. LB Hounslow is a London Borough and is therefore within the area covered by the Spatial Development Strategy for London (the London Plan). Section 24 (1)(b) of the PCPA 2004 requires borough plans to be in general conformity with the London Plan.

*NPPF*

- 2.5. The National Planning Policy Framework (NPPF) sets out the national planning policy with regards to maintaining effective cooperation. Paragraph 27 (28 in NPPF 2024) states that strategic policy-making authorities should prepare and maintain one or more statements of common ground (SoCG) in order to demonstrate effective and on-going joint working with duty to cooperate partners. Further guidance on the approach to take in the production of SoCGs is set out in national planning guidance.

### 3. Who Have We Engaged With

#### ***Neighbouring Authorities***

3.1. The local planning authorities which directly adjoin LB Hounslow are:

- LB Richmond upon Thames (LBRuT)
- LB Hammersmith and Fulham (LBHF)
- LB Ealing (LBE)
- LB Hillingdon (LBHi)
- Spelthorne BC (SBC)
- Surrey CC (SCC)

#### ***Prescribed bodies***

3.2. The prescribed bodies stipulated at 33A(1)(c) of the PCPA 2004 are those identified in Regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012:

- The Environment Agency
- The Historic Buildings and Monuments Commission for England (Historic England)
- Natural England
- The Mayor of London
- The Civil Aviation Authority
- The Homes and Communities Agency (\*Greater London Authority in London)
- each integrated care board established under Chapter A3 of Part 2 of the National Health Service Act 2006
- NHS England
- The Office of Rail and Road
- Transport for London (TfL)
- Integrated Transport Authority (\*TfL in London);
- each highway authority (National Highways);
- The Marine Management Organisation (MMO)

Further to the above, legislation stipulates that local planning authorities must also cooperate with:

- Local Enterprise Partnerships; and
- Local Nature Partnerships (for Hounslow this is made up of the Greater London Authority's London Nature Recovery team and the London Wildlife Trust)

#### ***Other Partnerships***

3.3. In addition to our engagement with neighbouring authorities and prescribed bodies, LB Hounslow is a member of two key partnerships which undertake joint strategic planning work in a number of areas. Engagement with these groups takes place on a semi regular basis and often provides members with the ability to provide informal updates to one

another on development plan and evidence base preparation. The key partnerships for the purposes of the duty to cooperate are:

*West London Alliance (WLA)*

3.4. The WLA is made up of LB Ealing, LB Harrow, LB Hillingdon, LB Brent, LB Barnet, LB Hounslow, and LB Hammersmith and Fulham. Quarterly meetings are held at Officer and Chief Officer levels to coordinate and discuss strategic planning work across the West London area. The WLA also produces joint plans and evidence base documents with some or all of these LPAs, including:

- West London Waste Plan (2015)
- West London SFRA Level 1 (2024 – LB Hounslow update)
- West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2019)
- West London Strategic Housing Market Assessment (and Addendum Report) (2018)

*Heathrow Spatial Planning Group (HSPG)*

3.5. The HSPG was established in 2015 to build collaborative working between Heathrow Airport Limited (HAL) and all the authorities and bodies responsible for the areas most affected by the Airport. Members share a range of views and engage in a range of capacities (from full members to ‘observers’), but all are united in the view that collaborative work is essential to best mitigate and compensate the negative impacts and maximise the benefits of the Airport to local residents, businesses and environment. HSPG full members are set out below:

- Heathrow Airport Ltd
- Elmbridge Borough Council
- London Borough of Ealing
- London Borough of Hounslow
- Royal Borough of Windsor and Maidenhead
- Runnymede Borough Council
- Slough Borough Council
- Spelthorne Borough Council
- Surrey County Council

Other organisations participate in many of the activities of the HSPG, many with ‘Observer’ status, including:

- Buckinghamshire Council
- Colne Valley Regional Park
- Council for the Independent Scrutiny of Heathrow Airport
- Department for Transport (Aviation Team) and other Government Departments
- Environment Agency
- Heathrow Transport Area Forum
- National Highways
- London Borough of Hillingdon
- London Borough of Richmond
- Natural England

- Strategic Aviation Special Interest Group (of the Local Government Association)
- Transport for London
- West London Alliance (of West London Boroughs)
- West London Business

3.6. The HSPG is independent, but works closely with, the airport operator Heathrow Airport Limited (HAL).

3.7. HSPG has produced a range of joint evidence base, strategic planning documents, and position statements, including the Heathrow Joint Spatial Planning Framework (2020) and HSPG Position Statement (2020).

### **Other SoCG**

3.8. LBH has also sought to enter into SoCG with other organisations which are not themselves subject to the duty to cooperate. This includes landowners and developers where such engagement has been considered necessary.

3.9. Currently LBH has sought to enter into SOCG with the following organisations:

- Chrisfys Properties Ltd (*still in progress*)

3.10. Should any further SoCG with other organisations be required – including any requested by the examining Inspector - these can be entered into to support the examination.

## 4. Duty to Cooperate Engagement Summary

4.1. This section provides a summary of the engagement with neighbouring authorities and prescribed bodies, including who has responded to requests for engagement at the various stages of plan production and where statements of common ground (SoCG) are being pursued. Information relating to the dates of duty to cooperate meetings and descriptions of what was discussed are provided in the following sections:

- engagement during the Regulation 18 stage is provided in section 5; and
- engagement at the Regulation 19 to submission stages is provided at section 6.

4.2. Completed SoCG are available to view on the Local Plan Review website:

<https://www.hounslow.gov.uk/localplanexamination>. Where a SoCG is still in progress, this will be added to the examination library once agreed with the examining Inspector.

### ***Duty to Cooperate Engagement Summary Table***

Name	Reg 18 Stage		Reg19/Submission Stage		Agreed to produce SOCG?	SoCG status
	Request sent?	Meeting date	Request sent?	Meeting date		
LB Richmond upon Thames	Y	No meeting	Y	08/10/24	Y	In progress
LB Hammersmith and Fulham	Y	13/12/23	Y	02/10/24	Y	In progress
LB Ealing	Y	No meeting	Y	07/10/24	Y	Completed
LB Hillingdon	Y	15/11/23	Y	01/10/24	Y	In progress
Spelthorne BC	Y	22/11/23	Y	11/10/24	Y	In progress
Surrey CC	Y	No meeting	Y	17/10/24	Y	Completed
The Environment Agency	Y	21/11/23	Y	04/10/24	Y	Completed
Historic England	Y	07/11/23	Y	15/10/24	Y	In progress
Natural England	Y	No meeting	Y	No meeting	N	N/A
Mayor of London	Y	22/11/23	Y	30/09/24	Y	In progress
Transport for London (TfL)	Y	22/11/23	Y	01/10/24	Y	In progress
Civil Aviation Authority	Y	No meeting	Y	No meeting	N	N/A
ICB/HUDU	Y	No meeting	Y	22/10/24	N	N/A
Office of Rail and Road	Y	No meeting	Y	No meeting	N	N/A
National Highways	Y	05/12/23	Y	22/11/24	Y	In progress
Marine Management Organisation	Y	No meeting	Y	No meeting	N	N/A
Local Nature Partnership (GLA and London Wildlife Trust)	Y	No meeting	Y	No meeting	N	N/A

Local Enterprise Partnership (London Enterprise Panel, GLA)	Y	No meeting	Y	No meeting	N	N/A
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## 5. Duty to Cooperate Engagement - Regulation 18 Stage

The following Tables display a summary of engagement with duty to cooperate partners at Regulation 18 consultation stage and up to launch of the Regulation 19 consultation (October 2023 – August 2024). Table 1 summarises engagement with adjoining planning authorities and Table 2 summarises engagement with prescribed duty to cooperate bodies.

**Table 1 Neighbouring Authorities**

Authority	Engaged at Reg 18 Stage? (Y/N)	Meeting held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
Spelthorne BC (SBC)	Y	22/11/23	<p><b>N.B.</b> Both parties have worked on a draft SoCG in 2023 and a highways specific SoCG in early 2024 to support the SBC local plan examination. This work will be revisited and updated following LBH's Reg19 stage.</p> <ul style="list-style-type: none"> <li>Local Plan process/timetable</li> <li>LBH provided an overview of Local Plan Review to date and the reasons for progressing a consolidated 'single' Local Plan, and taking this to Reg18.</li> <li>SBC provided overview of their Local Plan review to date, including an update on their examination timetable (at time of meeting, examination is paused awaiting publication of new NPPF).</li> </ul>	No actions required at this stage – both parties agreed that it would be appropriate to review strategic matters once the proposed submission version of the Hounslow Local Plan is published.	Both parties to engage further on strategic matters at Reg19 stage. LBH will share evidence base findings with SBC, and both parties will seek to agree a single SoCG prior to submission/ examination (if required).

Authority	Engaged at Reg 18 Stage? (Y/N)	Meeting held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
			<ul style="list-style-type: none"> <li>• Transport/highways – noted A30 impact continues to be a matter of interest. LBH confirmed transport/highways evidence will be refreshed to take account of passage of time/updated site allocations. LBH will share at Reg19 stage.</li> <li>• Gypsies, Travellers and Travelling Showpeople (GTTS) accommodation – LBH will not be updating own evidence but will share GLA evidence base when published.</li> <li>• Green Belt – LBH confirmed Green Belt Review Assessment will not be updated but cannot confirm GB release position at this time.</li> <li>• Southern Rail Access and Mayfield Farm allocation – parties discussed position on infrastructure scheme and allocation in light of Heathrow expansion position, but agreed it would be best to revisit once Reg19 draft Plan published.</li> </ul> <p><b>Note:</b> Reg18 representation received 04/12/23.</p>		
LB Hammersmith and Fulham	Y	13/12/23	<ul style="list-style-type: none"> <li>• Local Plan process/timetable</li> <li>• LBH provided an overview of Local Plan Review to date and reason for progressing a</li> </ul>	No actions required at this stage – both	Both parties to engage further on strategic matters at Reg19 stage,

Authority	Engaged at Reg 18 Stage? (Y/N)	Meeting held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
(LBHF)			<p>consolidated ‘single’ Local Plan, and taking this to Reg18. Parties discussed possible general election impacts to timetable and status of previous consultations/DtC engagement.</p> <ul style="list-style-type: none"> <li>• LBHF confirmed no commitment on their plan production timetable given uncertainties around proposed changes to the planning process. Also discussed SPDs in production. LBHF suggested further DtC discussions around boundary sites, river-related issues and town centres at Reg19. LBHF also noted issues around energy and electricity.</li> <li>• LBHF asked about approach to Urban Greening Factor (UGF) and Biodiversity Net Gain (BNG). LBH intending to provide local BNG policy approach to complement statutory framework and include Mayor’s UGF scores until local approach can be established.</li> </ul>	<p>parties agreed that it would be appropriate to review strategic matters once the proposed submission version of the Hounslow Local Plan is published.</p>	<p>and will seek to agree SoCG prior to submission/ examination (if required)</p>

Authority	Engaged at Reg 18 Stage? (Y/N)	Meeting held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
LB Hillingdon (LBHi)	Y	<p>LBH Reg18 meeting: 15/11/2023</p> <p>Meeting for LBHi Reg18 consultation: 13/06/2024</p>	<p><b>LBH Reg18 Meeting (15/11/2023)</b></p> <ul style="list-style-type: none"> <li>• Local Plan process/timetable</li> <li>• LBH provided an overview of the Local Plan Review to date and the reasons for progressing a consolidated 'single' Local Plan, and taking this to Reg18. LBHi agreed with principle of consolidating and updating.</li> <li>• LBHi confirm representation will be submitted and request previous comments also be taken into account (agreed).</li> <li>• LBHi confirm that matters relating to Green Belt release and Heathrow will likely form part of future duty to cooperate engagement at Regulation 19 stage. Parties discussed approach to Integrated Impact Assessment, specifically reasonable alternatives being assessed.</li> <li>• LBHi provided update on their own local plan review timetable.</li> </ul>	<p>No actions required at this stage – both parties agreed that it would be appropriate to review strategic matters once the proposed submission version of the Hounslow Local Plan is published.</p>	<p>Both parties to engage further on strategic matters at Reg19 stage, and will seek to agree a single SoCG prior to submission/examination (if required).</p>

Authority	Engaged at Reg 18 Stage? (Y/N)	Meeting held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
			<p><b>Note:</b> Reg18 representation received 08/12/2023</p> <p><b><i>LBHi Reg18 Meeting (13/06/2024)</i></b>            LBHi are undertaking a local plan review and are at Regulation 18 consultation stage, with Regulation 19 due to take place in early 2025.            Further matters discussed including:</p> <ul style="list-style-type: none"> <li>• Housing</li> <li>• GTTS Accommodation</li> <li>• Employment</li> <li>• Green Belt</li> <li>• Infrastructure (electrical capacity, transport, health, education etc).</li> <li>• Flood risk &amp; SFRA</li> <li>• Aggregates</li> <li>• Both parties discussed how to approach SoCG, agreeing to pursue a single SoCG document rather than a joint document with other partners.</li> </ul>		

Authority	Engaged at Reg 18 Stage? (Y/N)	Meeting held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
LB Ealing (LBE)	Y	<p>No meeting held at Reg18 stage</p> <p>Subsequent meeting held during LBE's Reg19 consultation on 05/04/24</p>	<p><b>N.B.</b> No meeting held at LBH Reg18 stage.</p> <p>A duty to cooperate meeting to discuss LBE's Reg19 draft local plan took place on 05/04/24. The following matters were discussed:</p> <ul style="list-style-type: none"> <li>• Employment</li> <li>• Housing</li> <li>• GTTS accommodation</li> <li>• Green Belt / Metropolitan Open Land releases</li> <li>• Transport and highways issues</li> <li>• Potential for cooperation on Ealing Regional Park proposal</li> <li>• Site Allocations</li> </ul>	<p>LBH provided representation to LBE's Reg19.</p> <p>No actions required at this stage – both parties agreed that it would be appropriate to review strategic matters once the proposed submission version of the Hounslow Local Plan is published.</p>	<p>Both parties to engage further on strategic matters at Reg19 stage, and will seek to agree a SoCG prior to submission/ examination (if required).</p>

Authority	Engaged at Reg 18 Stage? (Y/N)	Meeting held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
LB Richmond upon Thames (LBRuT)	Y	<p>No meeting held at Reg18 stage</p> <p>Various DtC meetings re. LBRuT draft local plan in 2023/24</p>	<p>LBRuT confirmed no duty to cooperate meeting required on Hounslow Local Plan Reg18 at this time. Both parties will engage at Reg19 stage.</p> <p>LBH and LBRuT agreed a <a href="#">SoCG on 11/06/2024</a> to support LBRuT's local plan examination (with hearings due to take place Summer 2024). The strategic matters covered in the SoCG include:</p> <ul style="list-style-type: none"> <li>• Housing</li> <li>• GTTS accommodation</li> <li>• Employment floorspace</li> <li>• Historic Environment (including Royal Botanic Gardens Kew World Heritage Site)</li> <li>• Transport and highways impacts</li> <li>• Site Allocations at the borough boundary</li> <li>• Protection of open spaces and land for biodiversity</li> </ul>	<p>No actions required at this stage – both parties agreed that it would be appropriate to review strategic matters once the proposed submission version of the Hounslow Local Plan is published.</p>	<p>Both parties to engage further on strategic matters at Reg19 stage, and will seek to agree an updated SoCG prior to submission/examination (if required).</p>

Authority	Engaged at Reg 18 Stage? (Y/N)	Meeting held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
Surrey CC (SCC)	Y	No meeting held at Reg18 stage	<p>SCC confirmed no meeting required at this time.</p> <p>Both parties will engage at Reg19 stage.</p> <p>Previous duty to cooperate engagement has focused on strategic transport and highways matters.</p> <p><b>Note:</b> Reg18 representation received 14/12/23.</p>	No actions required at this stage – both parties agreed that it would be appropriate to review strategic matters once the proposed submission version of the Hounslow Local Plan is published.	Both parties to engage further on strategic matters at Reg19 stage, and will seek to agree an updated SoCG prior to submission/ examination (if required).

**Table 2 Prescribed Bodies**

Prescribed Bodies	Engaged at Reg 18 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
The Environment Agency (EA)	Y	Reg18 DtC meeting: 21/11/2023  Follow up meeting: 21/02/24	<p><b>LBH Reg18 DTC Meeting (21/11/23):</b></p> <ul style="list-style-type: none"> <li>• Local Plan process/timetable.</li> <li>• LBH provided an overview of the Local Plan Review to date and the reasons for progressing a consolidated ‘single’ Local Plan, and taking this to Reg18.</li> <li>• EA confirmed technical teams will review Reg18 consultation document and respond on each topic area.</li> <li>• EA confirmed technical teams will also review IIA Scoping Paper.</li> <li>• EA provided overview of environmental context, areas of concerns and expectations for the update of various green &amp; blue infrastructure and environmental quality policies.</li> <li>• EA provided update on Thames Estuary 2100 Plan, Riverside Strategies, and BNG.</li> <li>• Both parties briefly discussed Strategic Flood Risk Assessment (SFRA) requirements, including whether a partial update would be acceptable. EA agreed to come back on this point.</li> </ul>	LBH will undertake a SFRA level 1 and SFRA level 2 update and will review detailed policy comments. EA will review Reg19 draft Local Plan and supporting documents and will engage further at this stage.	Both parties to engage further on strategic matters at Reg19 stage, and will seek to agree a SoCG prior to submission/ examination (if required).

Prescribed Bodies	Engaged at Reg 18 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
			<p><b>Note:</b> Reg18 representation received 14/12/23. IIA Scoping Paper response received 30/11/23.</p> <p><b>Follow up Meeting (21/02/24)</b> Follow up meeting held on to discuss representation. Discussion focused on:</p> <ul style="list-style-type: none"> <li>• Need for a new SFRA level 1 and SFRA Level 2 (including the availability of modelling that would be required to undertake this and EA role in confirming this).</li> <li>• Discussion around what is required with regards to undertaking a Riverside Strategy and Water Cycle Study.</li> <li>• LBH still processing detailed comments re. policy development – we will make necessary changes and EA will review at Reg19.</li> </ul>		
Historic England (HE)	Y	07/11/2023	<ul style="list-style-type: none"> <li>• Local Plan process/timetable.</li> <li>• LBH provided an overview of the Local Plan Review to date and the reasons for progressing a consolidated ‘single’ Local Plan, and taking this to Reg18.</li> <li>• Discussion around evidence base to be updated and what will happen to existing/new</li> </ul>	Both parties agreed to continue engagement and to review strategic matters once	Further engagement on heritage matters required at Regulation 19 stage. LBH to share evidence base when available.

Prescribed Bodies	Engaged at Reg 18 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
			<p>site allocations (final list to be shared when Reg19 is published).</p> <ul style="list-style-type: none"> <li>• HE maintain that it is important to do a Heritage Impact assessment for Hounslow sites/areas to support certain allocations, and this can be done as part of a literature review/topic paper (including the grouping of sites if necessary).</li> <li>• HE advised new guidance will be available and should be considered: <ul style="list-style-type: none"> <li>○ Wild heritage site guidance</li> <li>○ Climate change guidance</li> <li>○ ICOMOS – Heritage Impact Assessment guidance</li> <li>○ Archaeological database for Hounslow priority areas</li> </ul> </li> </ul> <p><b>Note:</b> Reg18 representation received 14/12/23. IIA Scoping Paper response received 27/11/23.</p>	the proposed submission version of the Hounslow Local Plan has been published.	
Natural England	Y	No	<p>No response to meeting request at Reg18 stage.</p> <p><b>Note:</b> IIA Scoping Paper response received 20/11/23.</p>	N/A	LBH to contact again at Reg19 stage to request engagement under duty to cooperate.
Mayor of London (GLA)	Y	22/11/23 (Joint	<ul style="list-style-type: none"> <li>• LBH provided an overview of the Local Plan Review to date and the reasons for progressing</li> </ul>	Both parties agreed to	Both parties to engage further on strategic

Prescribed Bodies	Engaged at Reg 18 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
		meeting with TfL)	<p>a consolidated 'single' Local Plan, and taking this to Reg18. Parties also discussed plan preparation process and timetable.</p> <ul style="list-style-type: none"> <li>• GLA asked about status of previous comments and whether scope has been extended beyond that consulted at Focused Issues Review (FIR) of Local Plan Vol.1 Reg18. LBH confirmed all previous comments considered and scope has been extended to cover all policy areas. GLA requested that consultation does not occur within pre-election period for Mayoral elections.</li> <li>• GLA asked for confirmation re. full amalgamation of GWC and WoB plans into new Local Plan - LBH confirmed a full review and consolidation process, along with necessary updates to policies where required.</li> <li>• GLA provided update on Planning for London programme to inform London Plan review, including various engagement events. GLA also provided updates on emerging LPGs covering industrial development, affordable housing, digital connectivity and parking.</li> <li>• LBH requested update on London SHLAA, and GLA responded that work on a new digital platform is underway.</li> </ul>	<p>continue engagement and to review strategic matters and general conformity issues once the proposed submission version of the Hounslow Local Plan has been published.</p>	<p>matters/general conformity at Reg19 stage, and will seek to agree a SoCG prior to submission/ examination (if required).</p>

Prescribed Bodies	Engaged at Reg 18 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
			<ul style="list-style-type: none"> <li>• Discussion of key general conformity matters: <ul style="list-style-type: none"> <li>○ Housing - LBH to follow London Plan 2021 approach toward identifying housing need beyond 10yr target at para 4.1.11 (GLA support this)</li> <li>○ Tall Buildings - LBH note GLA previous comments re. tall buildings policy and will be introducing London Plan compliant policy (GLA to review policy when ready)</li> <li>○ Employment – LBH undertaking update to Employment Land Review (ELR) which will inform policies which will also seek to be in general conformity with London Plan (GLA to review policies when ready).</li> </ul> </li> <li>• TfL ask about approach to Metropolitan Open Land (MOL) and Green Belt (GB), including releases – LBH are reviewing position of Southern Rail Access and what this means for Bedfont GB release sites. LBH will look to amend approach to be in general conformity, particularly with regard to GB release for housing.</li> <li>• GLA also enquired as to possible impact of the introduction of National Development</li> </ul>		

Prescribed Bodies	Engaged at Reg 18 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
			<p>Management Policies (NDMPs) – LBH will monitor this.</p> <ul style="list-style-type: none"> <li>• LBH confirmed position with regards to site allocations – GLA/TfL will review when Reg19 plan is published.</li> </ul> <p><b>Note:</b> GLA provided representation on 15/12/23</p>		
Transport for London (TfL)	Y	22/11/23 (Joint meeting with GLA)	<p><b>N.B.</b> Joint meeting with GLA – see above</p> <ul style="list-style-type: none"> <li>• TfL stated they will provide a one pager of policy expectations by way of representation.</li> <li>• TfL ask about approach to Metropolitan Open Land (MOL) and Green Belt (GB), including releases – LBH are reviewing position of Southern Rail Access and what this means for Bedfont GB release sites. LBH will look to amend approach to be in general conformity, particularly with regard to GB release for housing</li> <li>• TfL discuss changes in post-Covid context for the funding of key transport infrastructure projects since previous iteration of local plan documents (GWC and WoB). Will new strategy reflect latest position?</li> </ul>	Both parties agreed to continue engagement and to review strategic matters once the proposed submission version of the Hounslow Local Plan has been published.	Both parties to engage further on strategic matters at Reg19 stage, and will seek to agree a SoCG prior to submission/ examination (if required).

Prescribed Bodies	Engaged at Reg 18 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
			<ul style="list-style-type: none"> <li>• LBH are updating evidence base with special regard to post-Covid impacts, changes to site allocations &amp; etc. This will be set out in the updated Infrastructure Delivery Strategy (IDP) and corresponding policies/proposals.</li> <li>• TfL suggest Transport Study may need to look further at active travel proposals as this area is more advanced – LBH have agreed scope with TfL colleagues and will begin update following Reg18.</li> <li>• TfL suggest engagement with National Highways (NH) as evidence is being refreshed – LBH confirm engagement with NH is taking place.</li> </ul> <p><b>Note:</b> TfL provided representation on 15/12/23</p>		
Civil Aviation Authority	Y	No	No response to meeting request at Reg18 stage.	N/A	LBH to contact again at Reg19 stage to request engagement under duty to cooperate.
Integrated Care Board (ICB)/ London Healthy Urban	Y	No	No response to meeting request at Reg18 stage.	N/A	LBH to contact again at Reg19 stage to request engagement under duty to cooperate.

<b>Prescribed Bodies</b>	<b>Engaged at Reg 18 Stage? (Y/N)</b>	<b>Meeting Held?</b>	<b>Summary of matters discussed (including strategic matters)</b>	<b>Actions taken to address issues identified at Reg 18 stage</b>	<b>Duty to cooperate next steps</b>
Development Unit (HUDU)					
Office of Rail and Road	Y	No	No response to meeting request at Reg18 stage.	N/A	LBH to contact again at Reg19 stage to request engagement under duty to cooperate.
National Highways (NH)	Y	05/12/2023	<ul style="list-style-type: none"> <li>• LBH provided an overview of the Local Plan Review to date and the reasons for progressing a consolidated 'single' Local Plan, and taking this to Reg18. Parties also discussed plan preparation process and timetable (confirming Local Development Scheme will be updated following Cabinet approval in December 2023)</li> <li>• NH provided overview of key updates: <ul style="list-style-type: none"> <li>○ New Circular 01/2022 focusing more closely on sustainability and decarbonisation, net emission effects (in addition to requirements to undertake a robust transport assessment of the local plan).</li> <li>○ NH suggest Mayor's Transport Strategy (MTS) should underpin direction of the transport policies of the emerging local</li> </ul> </li> </ul>	Both parties agreed to continue engagement and to review strategic matters once the proposed submission version of the Hounslow Local Plan has been published.	Both parties to engage further on strategic matters at Reg19 stage, and will seek to agree an updated SoCG prior to submission/ examination (if required).

Prescribed Bodies	Engaged at Reg 18 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 18 stage	Duty to cooperate next steps
			<p>plan, and new approach should be mindful of updates to MTS</p> <ul style="list-style-type: none"> <li>• LBH confirmed previous/ongoing engagement with Surrey CC and Spelthorne BC relating to highways impacts, specifically relating to the A30/B378 'Bulldog' (Town Lane) junction close to Ashford Hospital.</li> <li>• LBH confirm Strategic Transport Assessment will be refreshed given passage of time and changes to site allocations – NH note this and will review at Reg19 stage.</li> <li>• Both parties agree the existing SoCG from 2021 will be refreshed to take account of latest evidence base and new Local Plan policies/proposals.</li> </ul>		
Marine Management Organisation	Y	No	No response to meeting request at Reg18 stage.	N/A	LBH to contact again at Reg19 stage to request engagement under duty to cooperate.
Local Nature Partnership (GLA London Nature Recovery team,	Y	No	<p>No response to meeting request at Reg18 stage.</p> <p><b>Note:</b> LWT provided representation to Reg18 via consultation portal.</p>	N/A	LBH to contact again at Reg19 stage to request engagement under duty to cooperate.

<b>Prescribed Bodies</b>	<b>Engaged at Reg 18 Stage? (Y/N)</b>	<b>Meeting Held?</b>	<b>Summary of matters discussed (including strategic matters)</b>	<b>Actions taken to address issues identified at Reg 18 stage</b>	<b>Duty to cooperate next steps</b>
and London Wildlife Trust)					
Local Enterprise Partnership (London Enterprise Panel, GLA)	Y	No	No response from LEP to meeting request. Meeting held with GLA local plan team (see above).	N/A	LBH to contact again at Reg19 stage to request engagement under duty to cooperate.

## 6. Duty to Cooperate Engagement – Regulation 19 to Submission Stage

The following Tables display a summary of engagement with duty to cooperate partners at Regulation 19 consultation stage and in the run up to the submission of the emerging Hounslow Local Plan (September 2024 – June 2025). Table 1 summarises engagement with adjoining planning authorities and Table 2 summarises engagement with prescribed duty to cooperate bodies.

**Table 1 Neighbouring Authorities**

Authority	Engaged at Reg 19 Stage? (Y/N)	Meetings held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 19 stage	Duty to cooperate next steps
Spelthorne BC (SBC)	Y	DtC meeting (Reg 19): 11/10/2024  Follow up meeting: 18/12/2024	<b>DtC meeting (Reg 19) 11/10/2024</b> LBH and SBC Regulation 19 duty to cooperate meeting takes place. Key matters discussed: <ul style="list-style-type: none"> <li>• General overview of emerging Local Plan</li> <li>• Housing – including discussion of housing need/London Plan target</li> <li>• Gypsies, Traveller and Travelling Showpeople – including emerging allocation 121 capacity</li> <li>• Economic Development</li> <li>• Greenbelt, Green and Blue Infrastructure</li> <li>• Transport / highways – including potential impacts of proposed levels of growth on highways network (A30/B378</li> </ul>	Both parties agreed an update to SBC’s Joint Statement Of Common Ground (SoCG) (January 2025) which is appended to the SBC <a href="#">Duty to Cooperate Compliance Statement Addendum UPDATED Jan 2025</a> .  No further issues raised at Regulation 19 stage.	Both parties to complete a LBH-SBC bilateral SoCG prior to LBH’s examination hearings to support the examination of the Hounslow Local Plan 2020-2041.

Authority	Engaged at Reg 19 Stage? (Y/N)	Meetings held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 19 stage	Duty to cooperate next steps
			<p>Bulldog Junction), and Southern Rail Access to Heathrow proposals</p> <ul style="list-style-type: none"> <li>• Energy and Carbon Reduction Policy</li> <li>• Spelthorne’s local plan review progress update</li> </ul> <p><b>N.B.</b> No representation received from SBC to LBH’s Regulation 19 consultation.</p> <p><b>Follow up meeting 18/12/2024</b> A follow up meeting took place at which both parties agreed on the process for demonstrating joint working through producing/updating statements of common ground:</p> <ul style="list-style-type: none"> <li>• Parties agreed to update SBC’s Joint SoCG to support Spelthorne’s local plan examination first</li> <li>• Parties agreed to then produce a LBH-SBC bilateral SoCG to support Hounslow’s emerging Local Plan examination.</li> </ul>		
LB Hammersmith and Fulham	Y	DtC meeting (Reg 19):	<b>DtC meeting (Reg 19) 02/10/2024</b> LBH and LBH&F Regulation 19 duty to cooperate meeting takes place.	No issues identified at Regulation 19 stage but parties have	Both parties to complete a LBH-LBH&F bilateral SoCG prior to LBH’s

Authority	Engaged at Reg 19 Stage? (Y/N)	Meetings held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 19 stage	Duty to cooperate next steps
(LBHF)		02/10/24	<p>Key matters discussed:</p> <ul style="list-style-type: none"> <li>• General overview of emerging Local Plan</li> <li>• Housing and Gypsies, Traveller and Travelling Showpeople – including discussion of evidence used</li> <li>• Economic development – ELR findings and approach to releasing GB to meet demand</li> <li>• Playing Pitch Strategy - LBH ambition to update PSS and this to inform future IDP updates</li> <li>• GB and MOL - LBH GB Review evidence base and approach to MOL in light of changing national policy. LBH&amp;F confirm only concerned with changes to MOL and LBH not proposing this.</li> <li>• Heathrow Opportunity Area – including discussion of potential impact of Heathrow expansion on plan strategy</li> <li>• BNG – local policy approach</li> <li>• Net Zero policy – discussion of emerging approaches</li> <li>• Transport</li> <li>• LBH&amp;F plan review progress update</li> </ul>	<p>agreed to complete a SoCG to agree updated positions on matters set out in existing <a href="#">Joint Statement of Common Ground (2020)</a>.</p>	<p>examination hearings to support the examination of the Hounslow Local Plan 2020-2041.</p>

Authority	Engaged at Reg 19 Stage? (Y/N)	Meetings held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 19 stage	Duty to cooperate next steps
			<b>N.B.</b> No representation received from SBC to LBH's Regulation 19 consultation.		
LB Hillingdon (LBHi)	Y	LB Hounslow DtC meeting (Reg 19): 01/10/2024	<p><b>LB Hounslow DtC meeting (Reg 19) 01/10/2024</b></p> <p>LBH and LBHi Regulation 19 duty to cooperate meeting takes place.</p> <p>Key matters discussed:</p> <ul style="list-style-type: none"> <li>• General overview of emerging Local Plan</li> <li>• Housing - including approach to target and Green Belt releases.</li> <li>• Gypsies, Travellers and Travelling show people (GTTS) accommodation needs and sites.</li> <li>• Employment (including data centres).</li> <li>• Proposed Green Belt releases to meet employment needs (including review of sites).</li> <li>• Highways network impacts.</li> <li>• Heathrow policy approach to runway expansion.</li> <li>• Hillingdon Plan Review Update.</li> </ul> <p><b>N.B.</b> LB Hillingdon responded to LBH Reg19 consultation on 28/10/24. Key matters raised:</p>	<p>Parties agreed to enter into a new SoCG to update previous <a href="#">LBH-LBHi SoCG (2020)</a>.</p> <p>LBH sent draft SoCG for LBHi to review on 25/03/25 and chased 23/05/25. No response received at point of submission.</p>	<p>Both parties to complete LBH-LBHi SoCG prior to LBH's examination hearings to support the examination of the Hounslow Local Plan 2020-2041.</p>

Authority	Engaged at Reg 19 Stage? (Y/N)	Meetings held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 19 stage	Duty to cooperate next steps
			<ul style="list-style-type: none"> <li>• Objection to site allocations and green belt release at Airport Business Park (Site Ref: 57 – Policy P4) and Land South of Western International Market (Site Ref: 77).</li> <li>• Support for removal of site allocations and green belt release at Heathrow Gateway.</li> <li>• Hillingdon Council notes the improvements made to the Hounslow Local Plan by the reduction of Green Belt area proposed for de-designation.</li> <li>• Commitment to further engagement on cross-boundary strategic matters.</li> </ul>		
LB Ealing (LBE)	Y	<p>LB Hounslow DtC meeting (Reg 19): 07/10/2024</p> <p>Joint Duty to cooperate meeting: 31/01/2025</p>	<p><b><i>LB Hounslow DtC meeting (Reg 19) 07/10/2024</i></b></p> <p>LBH and LBE Regulation 19 duty to cooperate meeting takes place.</p> <p>Key matters discussed:</p> <ul style="list-style-type: none"> <li>• LBH provided an overview of the Local Plan Review to date and the reasons for progressing a consolidated ‘single’ Local Plan</li> <li>• Brentford-Southall Link</li> <li>• Ealing Regional Park</li> <li>• Housing Targets &amp; London Plan Review</li> </ul>	<p><a href="#">LBH and LBE SoCG (March 2025)</a> completed 06/03/2025.</p>	Continued cooperation in line with completed SoCG.

Authority	Engaged at Reg 19 Stage? (Y/N)	Meetings held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 19 stage	Duty to cooperate next steps
			<ul style="list-style-type: none"> <li>• Great West Corridor &amp; Heathrow Opportunity Area</li> <li>• Greenbelt Releases</li> <li>• Transport (including the West London Orbital (WLO) and alignment on cycling networks)</li> <li>• Both councils expressed appreciation for ongoing collaboration and acknowledged the value of these discussions for strengthening their respective local plans.</li> </ul> <p><b>Joint Duty to cooperate meeting: 31/01/2025</b> Both parties confirmed strategic matters discussed in previous meetings for inclusion in an updated SoCG.</p>		
LB Richmond upon Thames (LBRuT)	Y	LB Hounslow DtC meeting (Reg 19): 08/10/2024  Combined DtC meeting with Historic England,	<p><b>LB Hounslow DtC meeting (Reg 19) 08/10/2024</b> LBH and LBRuT Regulation 19 duty to cooperate meeting takes place. Key matters discussed:</p> <ul style="list-style-type: none"> <li>• General overview of emerging Local Plan</li> <li>• Approach to housing</li> <li>• Approach to employment</li> </ul>	Draft LBH-LBRuT bilateral SoCG (non-design/heritage matters) sent to LBRuT for review on 07/05/2025.  Draft Joint LBH-RBGK-LBRuT SoCG (design/heritage)	Both parties to complete: <ul style="list-style-type: none"> <li>• LBH-LBRuT bilateral SoCG, and</li> <li>• Joint LBH-RBGK-LBRuT SoCG</li> </ul> <p>... prior to LBH's examination hearings to</p>

Authority	Engaged at Reg 19 Stage? (Y/N)	Meetings held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 19 stage	Duty to cooperate next steps
		Royal Botanic Gardens Kew and LBRuT: 08/01/2025	<ul style="list-style-type: none"> <li>• Proposed context and character policies, including engagement on potential tall buildings and heritage impacts affecting Royal Botanic Gardens, Kew WHS</li> <li>• Green Belt and Green and Blue infrastructure</li> <li>• Transport connectivity</li> <li>• Energy and Carbon Reduction Policy</li> <li>• LBRuT updated on Richmond Local Plan progress.</li> </ul> <p><b>N.B.</b> LBRuT submitted their representation to the Reg19 consultation in 2 parts:</p> <ul style="list-style-type: none"> <li>• Part 1 sent 28<sup>th</sup> October 2024 relates to the plan as a whole, with broadly supportive comments on each policy chapter other than Chapter 6.</li> <li>• Part 2 sent 8<sup>th</sup> November 2024 focusing on Chapter 6 (Context and Character) and strategic, cross-boundary issues in relation to tall buildings and the impact on views and settings of key heritage assets, especially on the Royal Botanic Gardens Kew World Heritage Site (Kew WHS) and its buffer zone, raising various soundness concerns related to policies P1 (a-c), CC1, CC3 and CC4,</li> </ul>	matters) sent to both parties on 23-06-25.	support the examination of the Hounslow Local Plan 2020-2041.

Authority	Engaged at Reg 19 Stage? (Y/N)	Meetings held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 19 stage	Duty to cooperate next steps
			<p>and suggested modifications to address these.</p> <p><b>Combined DtC meeting with Historic England, Royal Botanic Gardens Kew and LBRuT: 08/01/2025</b></p> <p>A combined duty to cooperate meeting was held on 8<sup>th</sup> January 2025 between LBH, LBRuT, Historic England (HE) and Royal Botanic Gardens, Kew (RBGK). Key matters discussed:</p> <ul style="list-style-type: none"> <li>• Potential common ground in relation to: <ul style="list-style-type: none"> <li>○ Corrections to Policy CC3 wording and figures for accuracy and consistency</li> <li>○ Mapping amendments for clarification</li> <li>○ Clarifications around the status of the GWC Masterplan &amp; Tall Buildings Study, and definitions</li> <li>○ Minor correction to references to significant adverse impacts, and to heritage impact assessments and townscape analysis</li> <li>○ Amendments to the HIA in the Tall Buildings study appendix</li> <li>○ Additional references to HIAs and ICOMOS guidance in Policy</li> </ul> </li> </ul>		

Authority	Engaged at Reg 19 Stage? (Y/N)	Meetings held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 19 stage	Duty to cooperate next steps
			<p>CC4, and engagement with RGBK and LBRuT</p> <ul style="list-style-type: none"> <li>○ General policy formatting points</li> <li>● Key matters where common ground was not considered to exist at this time: <ul style="list-style-type: none"> <li>○ HE request for detailed HIAs for site allocations</li> <li>○ Various updates to GWC Masterplan</li> <li>○ Amendments to tall buildings heights in GWC to reflect differing views on harm to Outstanding Universal Value (OUV) of Kew WHS</li> </ul> </li> <li>● General discussion on approaches to agreeing positions within a single or multiple SoCG/s to update <a href="#">SOCCG6 Royal Botanical Gardens Kew &amp; LBRuT (2020)</a>.</li> </ul> <p><b>N.B.</b> Subsequent email correspondence with parties determined that the best approach to demonstrating joint working on design/heritage matters would involve a separate bilateral LBH</p>		

Authority	Engaged at Reg 19 Stage? (Y/N)	Meetings held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 19 stage	Duty to cooperate next steps
			<p>and HE SoCG, and a joint SoCG between LBH, RBGK and LBRuT.</p> <p>All non-design/heritage matters between LBH and LBRuT would be considered in a bilateral SoCG.</p>		
Surrey CC (SCC)	Y	LB Hounslow DtC meeting (Reg 19): 17/10/24	<p><b><i>LB Hounslow DtC meeting (Reg 19) 17/10/2024</i></b></p> <p>LBH and LBRuT Regulation 19 duty to cooperate meeting takes place.</p> <p>Key matters discussed:</p> <ul style="list-style-type: none"> <li>• Transport Policy Update;</li> <li>• Transport Modelling;</li> <li>• Highways Impact Assessment;</li> <li>• Cross-boundary mitigation approach; and</li> <li>• Walking &amp; cycling links between LBH and SCC.</li> </ul> <p><b>N.B.</b> SCC submitted a representation for the Reg19 consultation which was supportive of proposed Policy EC1 relating the consideration of transport mitigation measures beyond the borough boundary where appropriate. SCC also agreed to produce an updated SoCG in advance of the examination of the draft Hounslow Local Plan.</p>	<p><a href="#">LBH and SCC SoCG (2025)</a> completed 28/04/2025.</p>	Continued cooperation in line with completed SoCG.



**Table 2 Prescribed Bodies**

Prescribed Bodies	Engaged at Reg 19 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 19 stage	Duty to cooperate next steps
The Environment Agency (EA)	Y	LB Hounslow DtC meeting (Reg 19): 04/10/24  Follow up meeting 1: 01/11/24  Follow up meeting 2: 24/01/25	<b>LB Hounslow DtC meeting (Reg 19): 04/10/24</b> LBH and EA Regulation 19 duty to cooperate meeting takes place. Key matters discussed:	<a href="#">LBH and EA SoCG (April 2025)</a> completed 07/04/2025.	Continued cooperation in line with completed SoCG.

			<ul style="list-style-type: none"> <li>• LBH update on SFRA level 1 and level 2 reports as agreed previously (Reg18);</li> <li>• Site allocations updates (to reflect SFRA);</li> <li>• Updates to Green &amp; Blue Infrastructure and Environmental Quality chapter policies;</li> <li>• Policy support for a Riverside Strategy by 2030;</li> <li>• EA to provide detailed environmental considerations for site allocations in their rep.</li> </ul> <p>Following this meeting, the EA contacted LBH to raise a soundness concern relating principally to the lack of a document clearly setting out how the sequential and exceptions test had been applied as part of the site selection process. This led to a follow up meeting being arranged.</p> <p><b><i>Follow up meeting 1: 01/11/24</i></b></p> <p>Both parties agreed that a consultation deadline extension could be granted to the EA which would allow LBH to produce the sequential and exceptions test document for the EA's review prior to the submission of their representation.</p> <p>LBH produced the Sequential and Exceptions Test report (2024) and shared this with the EA on 28/11/24. Following their review of this additional information, the EA submitted their Reg19 representation on 05/12/24 (confirming submission version is sound). EA also notified LBH</p>		
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Prescribed Bodies	Engaged at Reg 19 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 19 stage	Duty to cooperate next steps
			<p>that new modelling and mapping data for the River Crane had been made available.</p> <p><b>Follow up meeting 2: 24/01/25</b></p> <p>LBH sought a number of points of clarification in relation to the status of various advice provided in the EA's regulation 19 representation, specifically relating to:</p> <ul style="list-style-type: none"> <li>• Comments around cross-boundary flooding and the LBH SFRA Level 2</li> <li>• Inclusion of Site Allocation 110 - Albany Riverside in the LBH SFRA Level 2</li> <li>• The status of new River Crane Modelling (December 2024)</li> <li>• The status of policy and site allocation comments</li> <li>• Agreement on process for SoCG</li> </ul> <p>Both parties subsequently entered discussions on the production of a SoCG.</p>		
Historic England (HE)	Y	LB Hounslow DtC meeting (Reg 19): 15/10/2024	<p><b>LB Hounslow DtC meeting (Reg 19): 15/10/24</b></p> <p>LBH and HE Regulation 19 duty to cooperate meeting takes place.</p> <p>Key matters discussed:</p>	Draft LBH-HE SoCG (2025) sent for review on 19/06/25. This will update the previously	Both parties to complete SoCG prior to LBH's examination hearings to support the examination of the

Prescribed Bodies	Engaged at Reg 19 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 19 stage	Duty to cooperate next steps
		<p>Combined DtC meeting with Historic England, Royal Botanic Gardens Kew and LBRuT: 08/01/2025</p> <p>Follow up meeting 1: 12/02/2025</p>	<ul style="list-style-type: none"> <li>• LBH provided an overview of the draft Local Plan policies focusing on housing, economic development, green belt, green &amp; blue infrastructure and conservation &amp; design.</li> <li>• Approach taken toward identification of tall building locations, Heritage Impact Assessments, the approach to tall buildings evidence base (including changes to the baseline given recent heritage-related inquiries), the use of archaeological assessments for sites (in particular for green belt release sites), and proposals for the re-location of the ‘Cranford Lock-Up’.</li> <li>• Both parties also agreed to a follow-up meeting once HE’s representation has been submitted, including a joint meeting with representatives from LB Richmond upon Thames and Royal Botanic Gardens, Kew.</li> </ul> <p><b>N.B.</b> HE submitted a representation to the Regulation 19 consultation 06/11/2024 (including a submission related to the IIA). HE raised a number of objections re. soundness of draft policies CC1 - Context and Character, CC2 -</p>	<p>agreed <a href="#">LBH-HE SoCG dated December 2020</a>.</p>	<p>Hounslow Local Plan 2020-2041.</p>

Prescribed Bodies	Engaged at Reg 19 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 19 stage	Duty to cooperate next steps
			<p>Urban Design and Architecture, CC3 - Tall Buildings and CC4 – Heritage, as well as comments relating to the clarity of certain site allocations and the completeness and legibility of the Policy Map amongst other points.</p> <p><b>Combined DtC meeting with Historic England, Royal Botanic Gardens Kew and LBRuT: 08/01/2025</b></p> <p>A combined duty to cooperate meeting was held on 8<sup>th</sup> January 2025 between LBH, LBRuT, Historic England (HE) and Royal Botanic Gardens, Kew (RBGK). Key matters discussed:</p> <ul style="list-style-type: none"> <li>• Potential common ground in relation to: <ul style="list-style-type: none"> <li>○ Corrections to Policy CC3 wording and figures for accuracy and consistency</li> <li>○ Mapping amendments for clarification</li> <li>○ Clarifications around the status of the GWC Masterplan &amp; Tall Buildings Study, and definitions</li> <li>○ Minor correction to references to significant adverse impacts, and to heritage impact assessments and townscape analysis</li> </ul> </li> </ul>		

Prescribed Bodies	Engaged at Reg 19 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 19 stage	Duty to cooperate next steps
			<ul style="list-style-type: none"> <li>○ Amendments to the HIA in the Tall Buildings study appendix</li> <li>○ Additional references to HIAs and ICOMOS guidance in Policy CC4, and engagement with RGBK and LBRuT</li> <li>○ General policy formatting points</li> <li>● Key matters where common ground was not considered to exist at this time: <ul style="list-style-type: none"> <li>○ HE request for detailed HIAs for site allocations</li> <li>○ Various updates to GWC Masterplan</li> <li>○ Amendments to tall buildings heights in GWC to reflect differing views on harm to Outstanding Universal Value (OUV) of Kew WHS</li> </ul> </li> <li>● General discussion on approaches to agreeing positions within a single or multiple SoCG/s to update <a href="#">SOCG6 Royal Botanical Gardens Kew &amp; LBRuT (2020)</a>.</li> </ul> <p><b>N.B.</b> Subsequent email correspondence with parties determined that the best approach to demonstrating joint working on design/heritage matters would involve a separate bilateral LBH and</p>		

Prescribed Bodies	Engaged at Reg 19 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 19 stage	Duty to cooperate next steps
			<p>HE SoCG, and a joint SoCG between LBH, RBGK and LBRuT.</p> <p><b>Follow up meeting 1: 12/02/25</b></p> <ul style="list-style-type: none"> <li>• Focussed on the issue of Historic Impact Assessments.</li> <li>• Discussion of LBH’s current approach to assessing the impacts on the significance of heritage assets as demonstrated through the Great West Corridor Evidence base.</li> <li>• Discussion of possible options to reformulate the existing evidence base into a format in line with the UNESCO guidance.</li> <li>• HE advised on compliance with the latest UNESCO WHS HIA guidance.</li> </ul> <p><b>N.B.</b> a follow up email was sent by HE to LBH on 28/02/25 with their screening assessment on the site allocations outlining which allocations should have the development principles strengthened in the allocation wording and the allocations where a strategic HIAs of varying levels of detail are required.</p>		

Prescribed Bodies	Engaged at Reg 19 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 19 stage	Duty to cooperate next steps
Natural England (NE)	Y	No	<p>No response to DtC meeting request at Reg19 stage (email request sent 06/09/2024, and chased 03/10/2024).</p> <p><b>N.B.</b> NE submitted a representation for the Reg19 consultation on 03/10/24 confirming 'no comment' on the consultation for the Local Plan - Reg 19.</p>	N/A	LBH remain open to engaging NE in line with the duty to cooperate as part of future plan-making activity.

<p>Mayor of London (GLA)</p>	<p>Y</p>	<p>LB Hounslow DtC meeting (Reg 19): 30/09/24</p> <p>Follow up meeting 1: 24/10/24</p> <p>Follow up meeting 2: 21/01/25</p>	<p><b>LB Hounslow DtC meeting (Reg 19): 30/09/24</b></p> <p>The following strategic and general conformity matters were discussed:</p> <ul style="list-style-type: none"> <li>• Approach to housing (specifically the approach to establishing housing need beyond 2029 and the application of guidance at London Plan 2021 paragraph 4.1.11);</li> <li>• Approach to employment (specifically discussion around Classes E and B, appropriate employment designations, meeting industrial floorspace demand, and approach to green belt releases for employment sites);</li> <li>• Approach to green belt changes;</li> <li>• Approach to energy policies;</li> <li>• Approach to tall buildings (specifically reference to ‘maximum heights’, the interaction of policy approach with Royal Botanic Gardens, Kew World Heritage Site (WHS) and the interpretation of ‘Outstanding Universal Value’); and</li> <li>• Approach to Gypsies, Travellers and Travelling Showpeople accommodation.</li> </ul> <p><b>Follow up meeting 1: 24/10/24</b></p> <p>A follow up meeting was held to discuss the emerging approach to green belt releases to meet employment floorspace demand, future housing need and further discussion of tall buildings and the WHS in more detail.</p>	<p>Parties agreed to enter into a new SoCG to update previous <a href="#">LBH and the Mayor of London SoCG (May 2021)</a></p> <p>A draft SoCG (V1) was sent to GLA officers on 11/04/25.</p> <p>Further information was provided on 11/06/25 and 12/06/25.</p>	<p>Both parties to complete an updated SoCG prior to LBH’s examination hearings to support the examination of the Hounslow Local Plan 2020-2041.</p>
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Prescribed Bodies	Engaged at Reg 19 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 19 stage	Duty to cooperate next steps
			<p><b>N.B.</b> The Mayor submitted a representation to the Reg 19 consultation on 25/10/24 (and a further corrected version was received on 21/01/25). A separate response to LBH’s request for The Mayor’s opinion on the general conformity of the proposed draft Local Plan with the London Plan 2021 (as per Reg 21) was received on 15/11/24.</p> <p><b>Follow up meeting 2: 21/01/25</b> Meeting held to discuss the Mayor’s representation in more detail and to agree next steps to complete a SoCG between both parties.</p> <p>Subsequent email correspondence between both parties took place in May and June 2025 to provide answers to GLA queries in relation to the proposed content of the draft SoCG (including a short meeting on 09/06/25).</p> <p>In response to a request made by GLA on 09/06/25, LBH provided additional information on Gypsy and Traveller accommodation, the approach to Strategic Industrial Land (SIL) designation changes in the GWC, and the approach to the proposed tall buildings location in Brentford Town Centre on 11 &amp; 12/06/25.</p>		

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Transport for London (TfL)	Y	<p>LB Hounslow DtC meeting (Reg 19): 01/10/24</p> <p>Follow up meeting 1: 22/05/25</p>	<p><b>LB Hounslow DtC meeting (Reg 19): 01/10/24</b>            LBH and EA Regulation 19 duty to cooperate meeting takes place.            Key matters discussed:</p> <ul style="list-style-type: none"> <li>• Transport Policies: LBH updated transport policies EC1 and EC2, focusing on climate change targets, Vision Zero, prioritising active travel and Healthy Streets, carbon reduction, air quality improvements, and the inclusion of SPDs to enhance infrastructure quality;</li> <li>• Developer Considerations including TfL highlighting the need for additional land for the WLO project. LBH clarified that the current policy promotes WLO development without safeguarding land and confirmed that workplace parking levies are not being considered.</li> <li>• discussed upcoming consultations on active travel routes, and addressed the potential inclusion of new routes in the transport strategy</li> <li>• Transport Infrastructure and Connectivity Maps discussion.</li> <li>• Car-Free Development and Site Allocations discussion</li> </ul>	<p>Parties agreed to enter into a new SoCG to update previous <a href="#">LB Hounslow Joint Statement of Common Ground</a> (2020).</p> <p>A draft SoCG (V1) was sent to TfL on 10/04/25.</p> <p>Following TfL review, an updated SoCG (V3) was provided for TfL review on 19/06/25.</p>	<p>Both parties to complete a SoCG prior to LBH's examination hearings to support the examination of the Hounslow Local Plan 2020-2041.</p>

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			<ul style="list-style-type: none"> <li>Piccadilly Line Upgrade and Bus Infrastructure</li> <li>Bus Garages and Alternative Sites</li> </ul> <p><b>N.B.</b> A Reg19 representation was received from TfL on 21/10/24.</p> <p>A first draft of the SoCG was sent to TfL for review on 10/04/25.</p> <p>A follow up meeting between both parties was held on 22/05/25 to discuss the first draft of this SoCG and to agree next steps.</p>		
Civil Aviation Authority	Y	No	No response to DtC meeting request at Reg19 stage (email request sent 06/09/2024 and chased 03/10/2024).	N/A	LBH remain open to engaging CAA in line with the duty to cooperate as part of future plan-making activity.
Integrated Care Board (ICB)/ London Healthy Urban	Y	22/10/2024	<p><b>LB Hounslow DtC meeting (Reg 19): 22/10/24</b></p> <p>LBH and ICB/HUDU Regulation 19 duty to cooperate meeting takes place.</p> <p>Key matters discussed:</p> <ul style="list-style-type: none"> <li>Discussion on Health Impact Assessments (HIA), including validation requirements</li> </ul>	LBH emailed ICB/HUDU with a request to enter into a SoCG on 27/01/25, and chased a response on 12/03/25.	LBH remain open to engaging with ICB/HUDU as part of the current plan examination if required, and for any future plan-

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Development Unit (HUDU)			<ul style="list-style-type: none"> <li>Concerns raised about service accessibility for vulnerable Gypsy and Traveller communities, particularly on Greenbelt land, with LBH setting our allocation process for sites</li> <li>Discussion on Specialist Housing and Co-Living, including importance of adaptable housing for older people and targets for provision</li> <li>Community infrastructure including potential objections to health infrastructure within allocations</li> <li>Discussion around site allocations including health/community floorspace</li> </ul> <p><b>N.B.</b> ICB/HUDU submitted a representation for the Reg19 consultation on 28/10/25.</p>	No response to request has been received at the point of submission.	making activity.
Office of Rail and Road	Y	No	No response to DtC meeting request at Reg19 stage (email request sent 06/09/2024, and chased 03/10/2024).	N/A	LBH remain open to engaging ORR in line with the duty to cooperate as part of future plan-making activity.
National Highways	Y	Reg19 DtC meeting	NH were invited to a DtC meeting by email on 06/09/2024 and were chased on 03/10/2024.	Parties agreed to enter into a new SoCG to	Both parties to complete a SoCG prior

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(NH)		22/11/2024	<p>NH submitted a representation to the Reg19 consultation on 25/10/24. NH raised issues around insufficient evidence to demonstrate that the Local Plan growth can be accommodated in transport terms on the Strategic Road Network (SRN), and requested additional evidence to demonstrate either that the Local Plan will not have any severe or unacceptable safety impacts on the strategic road network, or that suitable mitigation is included within the Plan with a reasonable prospect of delivery at appropriate junctures in the Plan period.</p> <p><b>LB Hounslow DtC meeting (Reg 19): 22/11/24</b> LBH and NH arranged a duty to cooperate meeting to discuss the content of their Reg19 representation.</p> <p>Key matters discussed:</p> <ul style="list-style-type: none"> <li>• Background to engagement thus far (including SoCG 2021);</li> <li>• LBH described approach to updating transport and highways evidence to support the proposed submission version of the emerging Local Plan (Local Transport Impact Assessment Update (LTIA) 2024) and how this relates to previous evidence</li> </ul>	<p>update previous <a href="#">LBH and Highways England SOCG (June 2021)</a>.</p> <p>Engagement re. additional information requests from NH, with LBH providing all information requested by 17/06/25.</p> <p>A draft LBH-NH SoCG (2025) is being drafted and will be shared with NH for review.</p>	<p>to LBH's examination hearings to support the examination of the Hounslow Local Plan 2020-2041.</p>

Prescribed Bodies	Engaged at Reg 19 Stage? (Y/N)	Meeting Held?	Summary of matters discussed (including strategic matters)	Actions taken to address issues identified at Reg 19 stage	Duty to cooperate next steps
			<p>to support the withdrawn Local Plan Review (including WoB and GWC Transport Impact Assessments);</p> <ul style="list-style-type: none"> <li>• NH requested LTIA references previous TIA work – LBH agreed to undertake minor update to provide clarification;</li> <li>• Parties discussed need to define the reference case/do-minimum scenarios</li> <li>• Parties discussed comparison of emerging and previous Local Plan Growth (residential and employment), including overall numbers, spatial distribution, plan period/housing trajectory, approach to promoting car-free development etc.</li> <li>• Parties discussed changing travel behaviour and how this has impacted transport strategy (with additional information to be provided by LBH);</li> <li>• Parties discussed the consistency of approach NH take to local plan consultations when assessing the potential impact on the SRN;</li> <li>• Parties agreed next steps for engagement. LBH reiterated that no further modelling will be undertaken, however additional information and clarifications will be</li> </ul>		

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			<p>provided to address NH's concerns as part of an addendum to the LTIA;</p> <ul style="list-style-type: none"> <li>• Parties agreed to a follow-up meeting once this work is completed if required.</li> </ul> <p>Following this meeting both parties have corresponded by email to address the points raised and progress toward agreeing positions on transport and highways matters through a SoCG:</p> <ul style="list-style-type: none"> <li>• Email from NH 03/12/24 confirming information being requested.</li> <li>• Email from LBH 09/05/25 responding to NH with LTIA Addendum.</li> <li>• Email from NH 29/05/25 with further comments following review of LTIA Addendum.</li> <li>• Email from LBH 02/06/25 responding to further comments and confirming further info to be provided.</li> <li>• Email from LBH on 17/06/25 providing further information to NH request, and requesting confirmation that all outstanding information requests have now been addressed to allow draft SoCG to be drafted for NH review.</li> </ul>		

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Marine Management Organisation	Y	No	No response to DtC meeting request at Reg19 stage (email request sent 06/09/2024, and chased 03/10/2024).	N/A	LBH remain open to engaging MMO in line with the duty to cooperate as part of future plan-making activity.
Local Nature Partnership (GLA London Nature Recovery team, and London Wildlife Trust)	Y	No	No response to DtC meeting request at Reg19 stage (email request sent 06/09/2024, and chased 03/10/2024).  <b>N.B.</b> Engagement has taken place with GLA officers as part of engagement with The Mayor of London (see above).	N/A	LBH remain open to engaging those groups which make up the LNP for Hounslow in line with the duty to cooperate as part of future plan-making activity.
Local Enterprise Partnership (London Enterprise Panel, GLA)	Y	No	The GLA's website confirms that London's LEP closed in 2023: <a href="https://www.london.gov.uk/who-we-are/london-partnership-board/londons-local-enterprise-partnership-2012-2023">https://www.london.gov.uk/who-we-are/london-partnership-board/londons-local-enterprise-partnership-2012-2023</a> . As such, no response has been received to requests for engagement (on 06/09/2024 or 03/10/2024).  <b>N.B.</b> Engagement has taken place with GLA officers as part of engagement with The Mayor of London (see above).	N/A	N/A

