



**London Borough
of Hounslow**

Hounslow Local Plan 2020-2041

Statement of Common Ground

Between

London Borough of Hounslow

And

Environment Agency

Version no. 4

07/04/25

1. Introduction

- 1.1. This Statement of Common Ground (SoCG) has been prepared between the London Borough of Hounslow (LBH) and the Environment Agency (EA). It seeks to inform the independent examination of the proposed submission version of the Hounslow Local Plan 2020-2041 and will be submitted to the Planning Inspector alongside the local plan and other supporting documents/ahead of the examination hearing sessions.
- 1.2. LBH adopted their Local Plan 2015-2030 Volumes 1 & 2 in 2015. As instructed by their Inspector at that time, LBH went on to undertake a partial review of the local plan focusing on 2 key growth areas: the Great West Corridor and Heathrow (known as the 'West of Borough') opportunity areas. Following extensive consultation, LBH submitted three development plan documents (DPDs, one for each area and an update to the Vol.2 Site Allocations DPD) for examination in December 2020, with examination hearing sessions taking place in November/December 2021. Following the hearing sessions, a number of procedural issues were identified which led LBH to withdraw these DPDs and pause work on a Focused Issues Review of the Local Plan Vol.1.
- 1.3. LBH undertook a Regulation 18 consultation between 1st November and 17th December 2023 focusing on a proposal to consolidate the emerging DPDs into a single consolidate Local Plan document, and to update emerging policies in line with relevant considerations. Following this, LBH prepared updates to key evidence base documents and developed the proposed submission version of the Hounslow Local Plan 2020-2041, undertaking a Regulation 19 consultation on the draft Local Plan between 6th September and 28th October 2024. LBH is now in the process of analysing and collating responses received and preparing any additional work required prior to submission to the Secretary of State for examination.
- 1.4. The EA are a prescribed body under the Town and Country Planning (Local Planning) (England) Regulations 2012 with responsibilities for the protection and enhancement of the environment in England. The EA have undertaken extensive engagement with LBH throughout the various stages of plan-production to this point. A full record of engagement to date is provided in section 2 below.
- 1.5. The SoCG sets out both parties' agreed positions in relation to strategic matters identified during duty to cooperate meetings and as set out in the EA's Regulation 19 representation received 5th December 2024, and subsequent meetings and correspondence.

2. Background

- 2.1. LBH and the EA have engaged with one another to discuss duty to cooperate matters during the preparation of the draft Hounslow Local Plan 2020-2041.
- 2.2. Prior to commencing the current draft Hounslow Local Plan, this included engagement on the now withdrawn Local Plan Review for the Great West Corridor, West of Borough and Site Allocations DPDs, which led to the production of a [LBH-EA SoCG dated 3rd December 2020](#).
- 2.3. The EA also engaged in the production of the Focussed Issues Review of the Local Plan Vol.1, providing a Regulation 18 response on 18th November 2022.

- 2.4. More recently, the EA have engaged with LBH on the production of the single Local Plan, now known as the Hounslow Local Plan 2020-2041, providing representations to the Regulation 18 and Regulation 19 consultations and attending various meetings under the duty to cooperate.
- 2.5. The EA attended a Regulation 18 stage duty to cooperate meeting on 21/11/2023. The key matters discussed are listed below:
- The Local Plan process and LBH's plan production timetable;
 - 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;
 - The EA confirmed technical teams will review Reg18 consultation document and respond on each topic area;
 - The EA confirmed technical teams will also review IIA Scoping Paper;
 - The EA provided overview of environmental context, areas of concerns and expectations for the update of various green & blue infrastructure and environmental quality policies;
 - The EA provided an update on Thames Estuary 2100 Plan, Riverside Strategies, and BNG; and
 - Both parties briefly discussed Strategic Flood Risk Assessment (SFRA) requirements, including whether a partial update would be acceptable. The EA agreed to come back on this point.
- 2.6. The EA submitted a representation to the Regulation 18 consultation on 14/12/23. A separate response to the IIA Scoping Paper consultation was received 30/11/23 and this was forwarded on to the consultants preparing the IIA.
- 2.7. A follow up duty to cooperate meeting was held on 21/02/24 to discuss the EA's Regulation 18 representation in detail. The discussion focused on:
- The need for a new SFRA level 1 and SFRA Level 2;
 - The availability of modelling that would be required to undertake this, and clarification of the EA's role in confirming this had been undertaken correctly;
 - Discussion around requirements with regards to undertaking a Riverside Strategy and Water Cycle Study; and
 - LBH commitment to review detailed comments relating to policy development, and to make necessary changes for the EA to review at Regulation 19 stage.
- 2.8. LBH agreed to undertake a SFRA level 1 and SFRA level 2 update to support the proposed submission version of the Local Plan, and to review detailed policy comments ahead of updating key policies of interest. Both parties agreed to engage further on strategic matters at Regulation 19 stage when the proposed submission version of the local plan and the supporting evidence base documents were ready to review.
- 2.9. During the Regulation 19 consultation on the proposed submission version of the Hounslow Local Plan 2020-2041, LBH invited the EA for a meeting on 04/10/24. At the meeting, a number of matters relating to the proposed submission draft policies were discussed, as well as confirmation around the work that had been undertaken to update the SFRA level 1 and level 2 reports as agreed previously. The EA agreed to provide detailed comments

within a representation to the consultation once their technical teams had completed their review of the draft plan and supporting documents.

2.10. Following this meeting, the EA contacted LBH to raise a soundness concern relating principally to the lack of consultation on a document clearly setting out how the sequential and exceptions test had been applied as part of the site selection process. LBH confirmed this work had been done to inform the SFRA and site selection, and that an additional technical paper was due to be published prior to submission, however the EA stated that without this being evidenced at Regulation 19 stage they would have to find the plan unsound. A short 'follow-up' meeting was held on 01/11/24, at which 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.

2.11. 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 representation on 05/12/24. The EA's representation confirmed that following their review of the draft Local Plan, as well as the SFRA Level 2 and Sequential and Exceptions Test report, the submission is sound. The representation also contained various advice relating to the draft local plan chapters and policy, and the evidence base. Information was also provided on site allocations, and detailed advice relating to a number of areas. On the same day (05/12/25) the EA also notified LBH that new modelling and mapping data for the River Crane had been made available.

2.12. At a 'follow-up' duty to cooperate meeting on 24/01/24, 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:

- Comments around cross-boundary flooding and the LBH SFRA Level 2
- Inclusion of Site Allocation 110 - Albany Riverside in the LBH SFRA Level 2
- The status of new River Crane Modelling (December 2024)
- The status of policy and site allocation comments

2.13. This SoCG has been undertaken in order to demonstrate the cooperation between both parties, and to set out the agreements reached on the relevant strategic matters relating to the production of the proposed submission version of the Hounslow Local Plan 2020-2041.

3. Strategic Geography

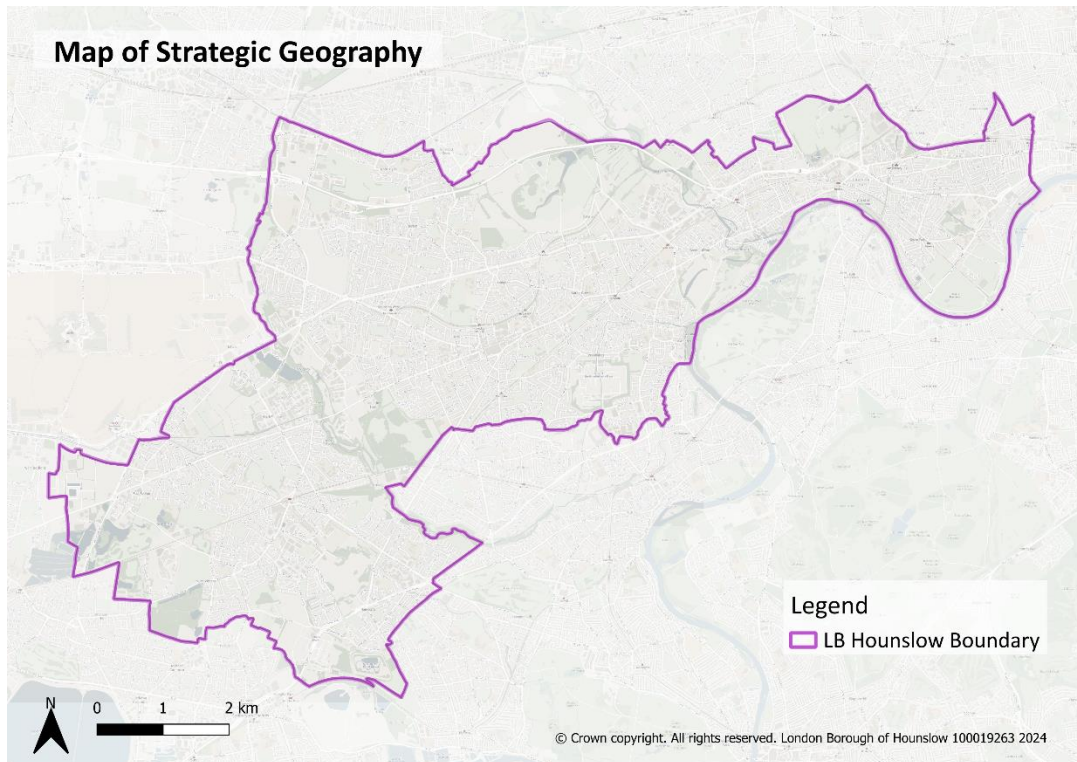


Figure 1: Map of strategic geography

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

4. Strategic Matters and Record of Agreement

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

- **The status of LBH’s SFRA Level 1 and Level 2 evidence base**
- **The status of advice contained in the EA’s Reg19 representation**

4.2. These matters are set out in more detail below, with a description of the relevant background to the matter in question and a record of agreement provided (with any agreed modifications set out in the table at Appendix A below). In cases where there are matters which cannot be agreed at this time, these are set out as outstanding matters under each matter below (with further details provided in the table at Appendix B).

4.3. The status of LBH’s SFRA Level 1 and Level 2 evidence base

Background

4.3.1. Both parties have engaged on the development of key flood risk evidence base documents, including an updated SFRA Level 1 and Level 2 (2024) and the Sequential and Exceptions Test report (2024), required to support the proposed submission version of the Hounslow local Plan 2020-2041.

Record of agreement

4.3.2. The EA confirms that the comments set out in their Regulation 19 representation (dated 05/12/24) relating to whether the SFRA has considered cross-boundary flooding and/or flood alleviation, and the recommendation that this be included as an addendum to the SFRA, are made in relation to future updates to the SFRA. The EA confirms that changes to the SFRA are not required to support the emerging Local Plan.

4.3.3. Both parties agree that the SFRA should be treated as a ‘living document’ and updated regularly to reflect new modelling or changes to policy.

4.3.4. In their Regulation 19 representation (dated 05/12/2024), the EA raised concerns that “*Site 110 Albany Riverside should have also undergone site-specific analysis*”. In light of this comment and subsequent to the agreement reached between the Council and the EA as detailed in Paragraph 4.3.3 above, the Council completed a site specific Level 2 SFRA Site Assessment for Site 110 Albany Riverside in late February 2025. This Site Assessment has been published as an addendum to the already published SFRA Level 2 and shared with the EA. The addendum will be submitted alongside the proposed submission version of the Local Plan.

4.3.5. The EA confirms that the SFRA Level 1 and Level 2 (2024) utilised the best available modelling data at the time of the proposed submission (Regulation 19) consultation to inform site selection and assessment, and that the SFRA Level 1 and Level 2 (2024) documents do not need to be updated again with new modelling (including the River Crane Modelling shared on 05/12/24) to support the emerging Local Plan.

4.3.6. LBH agrees to take the EA's recommendations relating to future updates of the SFRA into account when updating the SFRA in future, and will coordinate with West London Alliance partners to update the West London SFRA Level 1 (in particular where this relates to the new mapping and modelling for the River Crane).

Outstanding Matters?

4.3.7. There are currently no outstanding issues relating to this matter.

4.4. The status of advice contained in the EA's Reg19 representation

Background

4.4.1. The EA submitted their representation to the LBH's Regulation 19 consultation on the proposed submission version of the Hounslow Local Plan 2020-2041 on 05/12/24. The EA's representation confirms that, in their view, the submission is sound.

Record of agreement

4.4.2. Both parties agree that following engagement on the production of key evidence base documents and the development of emerging policies, the proposed submission version of the Hounslow Local Plan 2020-2041 is sound and legally compliant. This was confirmed at the duty to cooperate meeting on 24/01/24.

4.4.3. The EA confirm that the advice relating to emerging Local Plan policies (under the heading 'Chapters and Policies', pp.2-5) and site allocations (under the heading 'Appendix One – Site Allocations', pp.5-18) provided in their Regulation 19 representation does not relate to addressing any points of soundness. The EA confirm that the comments and suggested amendments are purely advisory and are presented by way of improving the policies or providing additional information, rather than being presented as modifications required to ensure these policies or site allocations would pass the tests of soundness set out in the NPPF (para 36).

4.4.4. LBH notes that the suggested amendments and comments are advisory only. LBH considers it is not necessary to present the EA's suggested policy amendments to the Inspector for their consideration as main or additional modifications to the proposed submission version of the Hounslow Local Plan 2020-2041 at this time (please see 'Appendix A: Table of Detailed Comments...' for more details).

4.4.5. Both parties agree that if the Inspector deems it necessary to propose any modifications in line with the EA's advice then we would be amenable to discussing this further at the appropriate examination hearing sessions.

Outstanding Matters?


4.4.6. There are currently no outstanding issues relating to this matter.


5. Governance Arrangements

- 5.1. It is agreed that informal discussions will occur between both parties on the strategic matters referred to in this Statement of Common Ground in the form of officer level meetings at least once every twelve months.
- 5.2. It is agreed that this Statement of Common Ground will be reviewed by both parties at a joint duty to cooperate meeting which will be held on an annual basis.

6. Signed confirmation

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

Signed on behalf of LB Hounslow		
Name and position	Signature	Date
Vincent Lacovara Head of Planning and Buildings		07/04/2025

Signed on behalf of Environment Agency		
Name and position	Signature	Date
Harry Scott Planning Advisor		04/04/2025

APPENDIX A: Table of Detailed Comments in Response to EA Advice Contained in Reg19 Rep

EA Re19 rep advice	LBH comments
<p>Policy GB4 – Green Infrastructure Network</p> <p>Point F. We reiterate that Point F of this policy should be strengthened to include active wording around the use of SuDS. The policy currently states that ‘this could include provision of green roofs, sustainable drainage systems’. We expect to SuDS to be encouraged on all developments so the wording of this policy should be updated, for example ‘this must/should include provision of green roofs, sustainable drainage systems’.</p>	<p>Comments noted.</p> <p>This textual amendment would be overly proscriptive in terms of the specific means of complying with the policy, and the proposed full clause F wording is considered to be suitably strong.</p> <p>The EA have confirmed that this amendment is not required to make the policy sound or legally compliant, therefore LBH do not propose to present this as a modification.</p>
<p>Policy GB5 – Blue Ribbon Networks</p> <p>We are pleased to see that the recommendation to prioritise efforts to remove culverts where possible has been taken on board and are therefore supportive of this policy.</p> <p>We are also pleased to see that point K of this has included our recommendation to include the wording on natural and undeveloped buffer zones.</p> <p>We are supportive of the reference to the Thames Estuary 2100 (TE2100) Plan within this Policy. <i>“Recognising the role the Blue Ribbon Network plays in flood and surface water management, by safeguarding access to flood defences, creating spaces for water and working with the Environment Agency and other partners to implement the actions of the Thames Estuary 2100 (TE2100) plan”;</i></p> <p>However, we would like to see further information in relation to point E detailing how the TE2100 plan would be implemented in Hounslow. It would also be beneficial to provide some further detail on how you aim to re-naturalise rivers.</p> <p>It is good to see the inclusion of appropriate buffer zones for all rivers, in relation to the 16m buffer to the Thames Tidal Defence, it may be worth mentioning that we measure this 16m from not just the defence itself, but any buried elements e.g. tie rods that may structurally support the defences.</p>	<p>Comments noted.</p> <p>Support welcomed.</p> <p>This level of detail would not be expected in a strategic policy. Please see response to comments for ‘Chiswick Approach’ below for more details. The EA have confirmed that this amendment is not required to make the policy sound or legally compliant, therefore LBH do not propose to present this as a modification.</p>
<p>Policy GB7 – Biodiversity</p>	

EA Re19 rep advice	LBH comments
<p>We are pleased to see Biodiversity Net Gain incorporated into this policy.</p>	<p>Support welcomed.</p>
<p>Policy EQ 2 - Sustainable Design and Construction We note that this policy promotes the use of Sustainable Drainage Systems (SuDS).</p> <p>We recommend that the following guidance be referenced with respect to SuDS:</p> <ul style="list-style-type: none"> (i) The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13; (ii) The CIRIA C753 SUDS Manual; (iii) The Susdrain website (iv) The Sustainable Drainage Systems: Non-Statutory Technical Standards guidance on gov.uk and the Recommendations To Update these. 	<p>Comments noted.</p> <p>The EA have confirmed that the inclusion of references to guidance is not required to make the policy sound or legally compliant, therefore LBH do not propose to present this as a modification. Please note some of this guidance is already contained in the LBH Character, Sustainability and Design Codes SPD.</p>
<p>Policy EQ 3 – Flood Risk and Surface Water Management</p> <p>We are pleased to see that Policy EQ3 includes all sources of flooding, considering the impacts of climate change.</p> <p>We support the ambition to enhance corridors (<i>Policy EQ3(c) and Policy 1(a) – Great West Corridor</i>) and are pleased to see inclusion of the watercourse within the policy details. However, the inclusion of '<i>where feasible</i>' can be ambiguous, and therefore should be removed. A decision whether to allow a development to have a smaller buffer zone can be made during the planning application process following a site-specific assessment. This also contradicts with points within GB5, that does not use the 'feasibility' wording. As standard we assess all developments with the intention of having a strong buffer zone.</p> <p>We would recommend utilising our pre-application service to discuss any improvements and see how they may be incorporated into site specific planning applications or as separate Flood Risk Activity Permits (FRAPs).</p> <p><u>Property Flood Resilience</u> EQ3(h) mentions 'Property Flood Resilience' measures. It is unclear if this something that the borough has as a project to help protect more homes. If so, links to further advice and guidance should be included.</p>	<p>Comments noted.</p> <p>Clause C. reads: <i>'[We will achieve this by:] Promoting the opening up of river corridors and increasing floodplain connectivity to make space for water through the creation of buffer zones to water courses with 8m for fluvial watercourses and 16m for tidal watercourses. Where feasible, these buffer zones should remain undeveloped or natural'</i>. Hence the reference to '<i>where feasible</i>' relates here to the condition/type of the buffer, not the requirement for, or size of, the buffer itself, as is suggested here.</p> <p>LBH do not understand why EA consider this to be unclear. This is a strategic policy clause and even provides some examples of PFR measures that could be utilised.</p>

EA Re19 rep advice	LBH comments
<p><i>[‘Chiswick Approach – Page 37...’ is not part of Policy EQ3 – see separate response below]</i></p> <p><u>Thames Estuary 2100 (TE2100)</u> We are pleased to see direct reference to the Thames Estuary 2100 Plan (TE2100 Plan), and the requirement for the raising of tidal flood defences in this Policy. EQ3(e) commits to creating a riverside strategy by 2030. We highly recommend doing so as soon as possible to help in achieving TE2100 Policy requirements. Please note, our comments regarding SuDS [on Policy EQ2] should also be applied to this policy.</p>	<p>The EA have confirmed that these changes are not required to make the policy sound or legally compliant, therefore LBH do not propose to present these as modifications.</p> <p>Support welcomed.</p>
<p>Chiswick Approach – Page 37</p> <p><i>- I. Promoting the area's connection with and to the River Thames by protecting and enhancing river-related facilities, improving legibility, accessibility, continuity and quality of the Thames Path, in addition to introducing greenery and encouraging the growth of wildlife habitats along the River Thames; and</i> <i>- J. Supporting measures to reduce flood risk in the area including upgrading defences.</i></p> <p>We are supportive of point I of this policy. However, in relation to point J, we believe it could be strengthened to include detail on the specific measures required to reduce flood risk. Further, more detail on how you will be upgrading the defences would be useful. We recommend that this is in line with the requirements of the TE2100 Plan.</p>	<p>Comments noted.</p> <p>This is a place vision for the Chiswick area within the spatial strategy section of the draft Plan. It is not appropriate to go into this level of detail here. As agreed previously with the EA, LBH have committed in Policy EQ3 (E.) to produce a Riverside Strategy by 2030 to assist in implementing actions in the TE2100. This will inform specific flood defence measures/upgrade projects which would then be set out in the Infrastructure Delivery Plan. As such we do not intend to propose any further modifications at this time.</p>
<p>Policy EQ 7 – Sustainable Waste Management</p> <p>We are supportive of this policy and are pleased to see that there is reference made to the West London Waste Plan.</p> <p>Please be aware that misconnections are high within urban areas such as Hounslow, therefore working with Thames Water should also include aiming to reduce misconnections from new development.</p>	<p>Comment noted and support welcomed. No modification proposed.</p>
<p>Policy EQ 8</p> <p><i>Our Approach</i> We support the guidance and legislation promoted in this section however we recommend that the Land Contamination Risk Management (LCRM) guidance is referred to here.</p>	<p>Comments noted.</p> <p>We do not consider the omission of a reference to guidance would make this policy unsound. No modification proposed.</p>

EA Re19 rep advice	LBH comments
<p><i>We will achieve this by</i> Point C. We recommend that this section is clarified to explain what infrastructure is being provided, by whom and at what stage of the planning process this is taking place.</p> <p><i>We will expect development proposals to</i> Point E. We suggest that the wording is strengthened here to promote high quality site investigation data from developers. The word “adequate” should be changed to “suitable”.</p> <p>Bullet point 4. The word “<i>normally</i>” should be replaced with “<i>always</i>”. Desk-based investigations should always identify historic site uses.</p> <p>Bullet point 7. We recommend that the sentence is strengthened to state <i>Demonstration of successful remediation must be demonstrated by the production of a verification report</i></p>	<p>This is a high-level strategic policy clause. The policy wording therefore needs to be flexible and concise. No modification proposed.</p> <p>“Adequate” and “suitable” are synonyms. No modification proposed.</p> <p>This is not accurate as purely desk-based investigation will not always identify all historic uses. No modification proposed.</p> <p>This is a note in supporting text rather than policy. Policy EQ8 is suitably strong and unambiguous on this point, and the EA confirm this represents a sound approach. No modification proposed.</p>
<p>Policy EQ 10 – Minerals</p> <p>We are supportive of this policy and reiterate that the impacts to groundwater quality and quantity must be considered.</p>	<p>Comments noted and support welcomed. No modification proposed.</p>
<p>Appendix One - Site Allocations</p> <p>Please find our comments on the ‘Hounslow Local Plan 2020 – 2041, Chapter 12: Site Allocations’ below. We have provided advice on environmental constraints within our remit. If a site is not mentioned, it has no constraints in our remit.</p> <p>Please note that all advice given is made based on guidance available at the time of writing. This is not approval in principle, comments may differ when applications are made officially for each development site.</p> <p><i>[see EA Reg19 rep for detailed comments]</i></p>	<p>Comments noted.</p> <p>The EA have confirmed that the comments provided for each emerging allocation are for information/advice only and no further modifications are required to the site allocations. Should development come forward, LBH will consult EA at application stage to receive the most up to date guidance/information relating to each site.</p>