

Hounslow Local Plan 2020-2041 – Schedule of Suggested Modifications.

(Last updated 23/06/2025)

A table is provided for each chapter and appendix where modifications are suggested/agreed with. A separate table is provided for Policy Map modifications in a separate document.

Text additions are made in Green as follows: additions in green underline and text deletions are made in red, with a strikethrough, as follows ~~deletions in red strikethrough~~.

The suggested modifications below each has its own reference number (e.g. HLP_C1_01) and the policy and paragraph numbering/clause refer to the text included in the Reg 19 Local Plan Submission Document. A reason for each suggested change is also provided. Chapters which aren't shown do not have any suggested modifications.

TITLE / CONTENTS / CHAPTER 1 – INTRODUCTION

Modification code	Policy/clause	Paragraph	Page	Modification	Reason for modification
<i>e.g. [HLP_C1_01]</i>					
HLP_C1_01	Contents Page	N/A	3	P1 (a) – Great West Corridor East <u>West</u> P1 (c) – Great West Corridor West <u>East</u>	Correction to contents page required

CHAPTER 2 – SPATIAL STRATEGY *(including Vision, Objectives, Place Policies, Neighbourhood Visions etc)*

Modification code <i>e.g. [HLP_C2_01]</i>	Policy, Map/Figure	Paragraph/Clause	Page	Modification	Reason for modification
<i>HLP_C2_01</i>	Spatial Strategy	2.5	12	Growth will be balanced and directed to appropriate locations to ensure that the many great landscape, natural and built heritage assets and distinctive residential characters found across the borough will be protected conserved and enhanced.	Historic England’s representation seeks a correction that the terms conserve and enhance should replace the terms protect, preserve, respect, safeguard in line with the NPPF and London Plan.
<i>HLP_C2_02</i>	Spatial Strategy	2.30	17	The quality of life and health of residents will be improved by the provision of supporting infrastructure and high quality and responsive design that respect and enhance local character. The vision and growth strategy is to direct growth into areas that have capacity for change, while protecting conserving and enhancing the many great landscape, natural and built heritage assets, and the distinctive established residential characters found across the borough.	Historic England’s representation seeks a correction that the terms conserve and enhance should replace the terms protect, preserve, respect, safeguard in line with the NPPF and London Plan.
<i>HLP_C2_03</i>	Spatial Strategy	2.31	17	The rich and varied heritage of the borough includes many very important designated heritage	Historic England’s representation seeks a correction that the terms conserve and enhance should replace the terms

			<p>assets. There are 28 conservation areas (mostly concentrated in the east of borough, in Chiswick, Brentford and Isleworth, and over 500 statutorily listed properties, both commercial and domestic. The borough also contains some of west London's remaining Great Estates at Chiswick, Gunnersbury, Boston Manor, Osterley and Syon, a unique and distinct aspect of the borough which contributes significantly to the environmental and cultural wealth of the borough. These assets have a considerable influence on the townscape of the borough, but so too do many non-designated assets, including locally listed buildings of townscape character and a wide variety of other assets important to local communities. Further designations will be made as appropriate and non-designated assets documented to the Heritage Environment Record so that their significance is properly understood and responded to in all development proposals impacting on them. Archaeological heritage will be protected and respected <u>conserved</u> according to its significance.</p>	<p>protect, preserve, respect, safeguard in line with the NPPF and London Plan.</p>
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HLP_C2_04	Figure SS1: Spatial Strategy for Ten Districts	N/A	23	Mapping modification to better clarify OA boundaries within Spatial Strategy for Ten Districts map.	For clarity As requested by The Mayor of London (Reg19 rep).
HLP_C2_05	Figure SS1: Spatial Strategy for Ten Districts	N/A	23	The indicative public transport connections in figure SS1 need to be amended to include West London Orbital to ensure consistency with Policy EC1 and Figure EC1.2.	For clarity as requested by TfL (Reg 19 rep)
HLP_C2_06	Fig P1.1: Great West Corridor Place Policy	N/A	25	Change label 'Brent River <u>& Grand Union Canal</u> Walk'	For accuracy and consistency As requested by the Canal & River Trust (Reg19 rep).
HLP_C2_07	Fig P1.1: Great West Corridor	N/A	25	Amend 'Brent River Walk' route to follow the existing towpath route where this crosses over Gallows Bridge to the north/east side of the river, and remove route which extends along the south/west side of the river North of Gallows Bridge (as existing).	For accuracy and consistency
HLP_C2_08	P1 Great West Corridor	A	25	Promoting the Great West Corridor as a strategic employment growth area, capable of the delivery of new homes and jobs , seeking to deliver a fundamental change in the accessibility of the areathrough increasing pedestrian permeability and through improving public transport;	For accuracy.
HLP_C2_09	P1 Great West Corridor	O	27	'Requiring development in this area to be car free or as close to car-free	Representations from TfL and others suggesting that car free should be the

				<u>as possible</u> in order to promote active and sustainable travel.’	starting point for development in the GWC where possible.
HLP_C2_10	P1 Great West Corridor	2.40	28-29	The area has a rich heritage, ranging from former industrial building to great estates. <u>The Great West Corridor, also known as t</u> The Golden Mile’ <u>stretches from Gillette Corner to Chiswick and</u> itself is peppered with significant listed art deco buildings including the landmark former Gillette factory and the JC Decaux offices.	Representation from Historic England seeking clarification on what the Golden Mile is.
HLP_C2_11	P1 Great West Corridor	2.41	29	Potential developments will need to account <u>conserve and enhance for</u> these <u>significance of</u> important heritage assets and their <u>including contribution made by</u> setting in any proposals <u>in and around the Great West Corridor Area.</u> , giving great weight to the assets’ conservation.	Representation from Historic England seeking clarification that heritage is mentioned to align with policy and that the term significance or significance including contribution made by setting should replace other terms such as character, architectural appearance, architectural/ historical/ special interest, value, and sole references to setting (because setting is not separate to significance)
HLP_C2_12	P1 (a) Great West Corridor West	A	32	Supporting the transformation <u>conservation and enhancement</u> of Boston Manor Park, including conserving the grade II listed structures of the park, appropriately improving the landscaping to the grade I listed Boston Manor House,	Representation from Historic England seeking clarification on the terminology in this policy.

				increasing biodiversity, and providing facilities for the local community;	
<i>HLP_C2_13</i>	P1 (a) Great West Corridor West	D	32	Preserving and enhancing the <u>significance of</u> listed Art Deco buildings and structures in the area, including their setting and distinctive frontages, to bring them back into use, to give them due prominence and to improve the surrounding public realm;	Historic England's representation should state that the term significance or significance including contribution made by setting should replace other terms such as character, architectural appearance, architectural/ historical/ special interest, value, and sole references to setting (because setting is not separate to significance)
<i>HLP_C2_14</i>	P1 (b) Great West Corridor Central	G	34	Supporting the delivery of the West London Orbital line <u>which would serve connection to</u> Brentford Station in order to increase the PTAL <u>improve the connectivity</u> of the River Brent Quarter and the London Gateway area.	Representation from TfL which provides more accurate wording that gives better clarity to the Policy clause.
<i>HLP_C2_15</i>	P1 (c) Great West Corridor East	H	35	Insert below point: <u>Supporting enhancements to Kew Bridge Station to improve accessibility at the station and ensure connectivity with new public realm to encourage usage of the rail network</u>	In response to representation from Network Rail that clarity is required around station accessibility needs

HLP_C2_16	P1 (c) Great West Corridor East Chiswick	Diii	36	New West London Orbital rail link from Hounslow <u>station</u> to Hendon/West Hampstead via the proposed west London transport interchange at Old Oak Common (links to Crossrail Elizabeth L line and High Speed 2)	Representation from TfL which provides more accurate wording that gives better clarity to the Policy clause.
HLP_C2_17	P1 (c) Great West Corridor East: Chiswick	E	36	Protecting <u>Conserving</u> and enhancing the much-loved low to medium-rise Victorian and Edwardian townscape of two to three storey terraced housing and promoting this type as a cue for future developments;	Historic England's representation seeks a correction that the terms conserve and enhance should replace the terms protect, preserve, respect, safeguard in line with the NPPF and London Plan
HLP_C2_18	P1 (c) Great West Corridor East: Brentford	B III	38	Ensuring that new development respects <u>the significance, including any contribution made by setting</u> , of the historic environment, the character of existing neighbourhoods , integrates archaeological remains, and is sensitive to the setting of assets outside the Borough boundary including the Royal Botanical Gardens, Kew World Heritage Site;	Historic England's representation should state that the term significance or significance including contribution made by setting should replace other terms such as character, architectural appearance, architectural/ historical/ special interest, value, and sole references to setting (because setting is not separate to significance)
HLP_C2_19	P1 (c) Great West Corridor East: Brentford	F	38	Promoting the provision of public transport improvements for Brentford, including links to the Elizabeth line at Southall via a new station along the Golden Mile, <u>and the new West London Orbital rail link</u> from Hounslow station to	Representation from TfL which provides more accurate wording that gives better clarity to the Policy clause.

				Hendon/West Hampstead via the proposed West London Orbital transport interchange at Old Oak Common (links to Elizabeth line and High Speed 2)	
HLP_C2_20	P1 (c) Great West Corridor East: Osterley and Spring Grove	D	41	Promoting Osterley House and Park as <u>a</u> key heritage and green assets;	Grammatical correction
HLP_C2_21	P1 (c) Great West Corridor East: Osterley and Spring Grove	E	41	Protecting <u>Conserving</u> views to Osterley Park and from within and across existing areas of Metropolitan Open Land;	Historic England's representation seeks a correction that the terms conserve and enhance should replace the terms protect, preserve, respect, safeguard in line with the NPPF and London Plan.
HLP_C2_22	P1 (c) Great West Corridor East: Osterley and Spring Grove	F	41	Securing improved public transport provision through a <u>the new West London Orbital</u> rail link from Hounslow station to Hendon/West Hampstead via the proposed west London transport interchange at Old Oak Common (links to the Elizabeth l ine and High Speed 2)	Representation from TfL which provides wording that gives better clarity to the Policy clause.
HLP_C2_23	P1 (c) Great West Corridor East: Isleworth	B	43	Maintaining and improving the riverside village character through preserving, protecting <u>conserving</u> and enhancing the varied townscape;	Historic England's representation seeks a correction that the terms conserve and enhance should replace the terms protect, preserve, respect, safeguard in line with the NPPF and London Plan
HLP_C2_24	P1 (c) Great West Corridor East: Isleworth	B VII)	45	Embrace the delivery of contemporary and exemplary new buildings and landmarks in the town centre, whilst protecting <u>conserving</u> and enhancing existing historic elements <u>the historic character and</u>	Historic England's representation seeks a correction that the terms conserve and enhance should replace the terms protect, preserve, respect, safeguard in line with the NPPF and London Plan

				<u>the significance of the heritage assets from which that from which that is derived.</u>	It also seeks further clarification from the policy text.
HLP_C2_25	P2 West of Borough	G	48	Supporting businesses of all sizes by ensuring availability of a range of workspaces and unit sizes, start-up space, co-working space and 'grow-on' space g . Amend subsequent paragraph numbering as needed.	Separation of merged policy points as a formatting issue.
HLP_C2_26	P2 West of the Borough	L	48	Delete and in particular, small business units.	In response to representation from SEGRO, and to clarify that the policy is aimed at ensuring the reversion of existing small business units currently on the site.
HLP_C2_27	P2 West of Borough	2.55	49	The West of Borough is one of the greenest areas in Greater London, with three rivers, <u>a canal</u> , a significant country park at Bedfont Lakes, the historic Hanworth Park and large areas of semi-rural land to the north and southwest. The River Crane corridor is an important north to south strategic link in the All London Green Grid. Hounslow Heath and Hanworth Park are significant open spaces in the area. All of the Borough's existing Metropolitan Green Belt is located in the West of Borough area. A key aim of the plan is to improve the quality of the natural and built environment, by	Correction to include a canal that is present as suggested in the Canal and River Trust's representation

				tackling the causes and impacts of pollution and climate change, conserving and where opportunities arise, enhancing the heritage assets and their setting; securing high quality architecture that responds sensitively to the local context; improving woodland and important habitats and increasing access to open space.	
HLP_C2_28	P2 West of the Borough: Hounslow West	F	51	Continuing to protect <u>conserve and enhance the significance of the special architectural and</u> historic buildings at Cavalry Barracks;	Historic England's representation seeks a correction that the terms conserve and enhance should replace the terms protect, preserve, respect, safeguard in line with the NPPF and London Plan Historic England's representation should state that the term significance or significance including contribution made by setting should replace other terms such as character, architectural appearance, architectural/ historical/ special interest, value, and sole references to setting (because setting is not separate to significance)
HLP_C2_29	P2 (a) Cranford and Heston Neighbourhoods	A	55	Enhancing walking and cycle routes, which can connect the existing river corridor, to other green spaces, such as Airlinks Golf Course and Osterley	Factual correction to text as suggested by representation from Canal and River Trust.

				Park and to the national cycle route along the Grand Union Canal;	
HLP_C2_30	P2 (a) Cranford and Heston Neighbourhoods	D	55	Strengthening local identity and character of Cranford Neighbourhood Centre by investigating the feasibility of relocating <u>options for the optimal viable use of</u> the historic “lock up” Grade II Listed building <u>are explored</u> to the important landmark location at the junction of Bath Road and the Avenue. The lockup should be reactivated with communal, social and/or retail uses;	Representation from Historic England seeking further clarity from the policy that options for its optimal viable use are explored
HLP_C2_31	P2 (a) Cranford and Heston Neighbourhoods	G	56	Delivering a high-quality public realm with active frontages and/or elevations that relate positively to Cranford Neighbourhood Centre and removing traffic barriers and initiating <u>working with TfL to investigate the potential for Healthy Streets improvements</u> traffic calming measure to roads including the Great West Road (A4/ A30), Bath Road (A4), and Parkway (A312)	Representation from TfL which provides wording that gives better clarity to the Policy clause.
HLP_C2_32	P2 (a) Cranford and Heston	B	57	Protecting <u>Conserving the significance of</u> surviving historic	Historic England’s representation seeks a correction that the terms conserve

	Neighbourhoods: Bedfont			fabric <u>and any contribution made by their settings</u> in locations such as Bedfont Green;	and enhance should replace the terms protect, preserve, respect, safeguard in line with the NPPF and London Plan and correction that the significance of heritage assets can be derived from their setting
HLP_C2_33	P2 (a) Cranford and Heston Neighbourhoods: Feltham	P	60	Protecting <u>Conserving the significance of</u> surviving historic fabric <u>and any contribution made by their settings</u> in locations such as Old Feltham and ensuring new development enhances its setting;	Historic England's representation seeks a correction that the terms conserve and enhance should replace the terms protect, preserve, respect, safeguard in line with the NPPF and London Plan and correction that the significance of heritage assets can be derived from their setting
HLP_C2_34	P2 (b) Feltham	G	62	Preserving <u>Conserving and enhancing the significance of</u> Feltham Town Centre Conservation Area and protecting-conserving and enhancing and contributing to local views of the spire of <u>the Grade II listed St Catherine's Church tower, in particular its landmark status which requires development proposals to be subservient in height and massing and maintain or enhance key views in which the tower's significance can be understood;</u>	Historic England's representation seeking clarification that it is the significance (including the contribution of setting) of the grade II church tower that needs conserving and enhancing, in particular, its landmark status,
HLP_C2_35	P2 (b) Feltham West of Borough	G	63	Preserving <u>Conserving</u> and enhancing the Feltham Town Centre Conservation Area	Historic England's representation seeks a correction that the terms conserve and enhance should replace the terms

				and protecting <u>conserving</u> and contributing to local views of the spire of St Catherine's Church;	protect, preserve, respect, safeguard in line with the NPPF and London Plan
<i>HLP_C2_36</i>	P2 (c) Land at Hatton Fields	Figure P2.4	64	Amend 5 th item in the legend to remove the following wording shown in red: Vegetated Buffer between Industrial and Nature Uses	In response to representation from JCAL, and for clarification that the green buffer and planted tree margin will extend to the north of Hatton Road and east of Myrtle Avenue as shown in Figure P2.4
<i>HLP_C2_37</i>	P2 (c) Land at Hatton Fields	D	65	Protecting and enhancing the landscape character, environmental quality and the biodiversity value of the adjacent Site of Importance for Nature Conservation and supporting the delivery of landscaping, a green buffer and tree planted margins along the <u>site</u> boundaries with neighbouring open space to provide corridors for habitats;	In response to representation from JCAL, and for clarification that the green buffer and planted tree margin will extend to the north of Hatton Road and east of Myrtle Avenue as shown in Figure P2.4

CHAPTER 4 – ECONOMIC DEVELOPMENT

Modification code <i>e.g. [HLP_C4_01]</i>	Policy; map/ figure	Paragraph/Clause	Page	Modification	Reason for modification
<i>HLP_C4_01</i>	ED1 Promoting Employment Growth and Development	H (III)	84	Add extra bullet point to Policy ED1 Part H (III) to state: <u>'Any proposal for development on land assessed to be grey belt under the terms of the 2024 National Planning Policy Framework'</u>	For clarification, to reflect the new grey belt designation introduced under national policy.
<i>HLP_C4_02</i>	ED2 Maintaining the Borough's Employment Land Supply	H	90	Correct formatting of use class reference to delete ' e.g. i, ii, iii ' and replace with ' <u>E(g)(i), (ii), (iii)</u> '	To correct an unintended auto correction to formatting.
<i>HLP_C4_03</i>	Fig ED1: Economic Development land in the Borough	N/A	98	Amend chapter map to clearly show new LSIS designations on Green Belt release sites and on existing employment sites.	GLA Reg19 rep request to ensure new employment designations are clearly identified within the HLP.

CHAPTER 5 – SUSTAINABLE MIXED COMMUNITIES

Modification code <i>e.g. [HLP_C5_01]</i>	Policy; map/ figure	Paragraph/Clause	Page	Modification	Reason for modification
HLP_C5_01	SC1 Increasing Housing Supply	"Our Approach"	99	<p>We will meet and exceed our London Plan derived target of 1,782 homes per annum over the period 2020-2029, delivering more than the 16,038 homes required by 2029².</p> <p>² <u>As well as an additional 257 homes to be delivered by 2029, to account for previous under delivery against the London Plan set target in monitoring year 2019-20. Housing supply figures, including completions, from 2019-20 are set out in the Housing Background Paper (2025).</u></p>	To clarify that an additional 257 homes will also be added to the housing target, in addition to the 1,782 homes per year from 2020-2029, to take account of under-delivery against the target of 1,782 homes during the monitoring year 2019-20. As per representation from the Mayor of London.
HLP_C5_02	SC1 Increasing Housing Supply	5.2	101	<p>5.2 To deliver the homes needed in the borough, the Council will apply Hounslow's London Plan derived target of 1,782 homes per annum from 2020 to 2029, which is 16,038 homes³.</p> <p>³ <u>As well as an additional 257 homes to be delivered by 2029, to account for previous under delivery against the London Plan set target in monitoring year 2019-20.</u></p>	To clarify that an additional 257 homes will also be added to the housing target, in addition to the 1,782 homes per year from 2020-2029, to take account of under-delivery against the target of 1,782 homes during the monitoring year 2019-20. As per representation from the Mayor of London.
HLP_C5_03	SC1 Increasing Housing Supply	5.2	101	The Local Plan housing target for the plan period 2020 to 2041 is therefore 28,040 <u>28,295</u> homes.	For clarification. To clarify that with 257 homes included to take account of under-delivery against the

					target of 1,782 homes during the monitoring year 2019-20, the housing target for the plan period 2020 to 2041 is 28,295 homes, rather than 28,040 homes. As per representation from the Mayor of London.
HLP_C5_04	SC1 Increasing Housing Supply	Figure SC 2.1	103	Figure SC 2.1: Housing Trajectory 2020 – 2041 to be superseded with an updated version of Figure SC 2.1 that amends the housing target per annum in the column labelled 2020/21 from 1,782 to 2,039, and amends the cumulative housing target in the column labelled 2020/21 from 1,782 to 2,039 and to amend the cumulative housing target for each subsequent monitoring year to reflect that it is 257 homes higher.	For clarification, to include 257 additional homes as part of the housing target in 2020/2021 to take account of under-delivery against the target of 1,782 homes during the monitoring year 2019-20. As per representation from the Mayor of London.
HLP_C5_05	SC9 Accommodation for Gypsies, Travellers and Travelling Showpeople	A	126	A. Allocating sites to meet a significant proportion of our identified specialist housing needs for the Gypsy and Traveller and Travelling Showpeople communities over the plan period; A. <u>Setting a 10 year target to deliver 26 Gypsy and Traveller pitches and 12 Travelling Showpeople plots by 2030 to meet the identified specialist housing needs set out in the Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTTSANA) (2019).</u>	To include the borough's 10 year pitch and plot target for Gypsy, Traveller and Travelling Showperson accommodation, in Policy SC9. As per representation from the Mayor of London.
HLP_C5_06	SC9 Accommodation	B	126	B. <u>Identifying two new sites to provide 20 additional pitches to meet the future</u>	For clarification, moving Part C to Part B of Policy SC9 to

	for Gypsies, Travellers and Travelling Showpeople			<p><u>needs of Gypsies and Travellers and 12 additional plots to meet the future needs of Travelling Showpeople;</u></p> <p>C. Identifying two new sites to provide additional pitches to meet the future needs of Gypsies and Travellers and additional plots to meet the future needs of Travelling Showpeople;</p>	set the scene for meeting the 10 year pitch and plot target and including the number of pitches and plots that will be delivered on site allocations. As per representation from the Mayor of London.
HLP_C5_07	SC9 Accommodation for Gypsies, Travellers and Travelling Showpeople	C	126	<p>B. C. Safeguarding and supporting the enhancement of the borough's existing Gypsy and Traveller and Travelling Showperson sites and, where appropriate feasible, intensifying and/or expanding the existing Hartlands sites in the West of the Borough to contribute to meeting the remainder of the borough's 10 year pitch target and supporting their enhancement;</p>	To explain further requirements that will be undertaken to meet the borough's 10 year pitch and plot target. As per representation from the Mayor of London.
HLP_C5_08	SC9 Accommodation for Gypsies, Travellers and Travelling Showpeople	Part D	126	Considering proposals for additional pitches or plots on alternative sites in the medium-long term beyond 2030 , where there is an identified unmet need and the use of the site would have no serious adverse impact on the amenity of occupiers of adjoining land, and no serious adverse impact on the visual amenity of the locality;	For clarification, to provide a specific point in time from which Part D of Policy SC9 will apply, which is beyond the 10 year pitch and plot target. As per representation from the Mayor of London.
HLP_C5_09	SC9 Accommodation for Gypsies, Travellers and Travelling Showpeople	5.38	127	5.38 Gypsy and Traveller accommodation is a specialist form of housing suitable for meeting the needs of qualifying people, for which adequate provision should be made to meet evidenced need in accordance with national planning policies and the London Plan. <u>The London Plan requires the Local Plan to include a 10-year target for permanent Gypsy and</u>	For clarification, to explain why a 10 year pitch and plot target is required. As per representation from the Mayor of London.

				<u>Traveller pitches and Travelling Showpeople plots, based on a needs assessment.</u>	
HLP_C5_10	SC9 Accommodation for Gypsies, Travellers and Travelling Showpeople	5.40	127	5.40 The GTTSANA 2019 identifies a need of 33 Gypsy and Traveller pitches, and 26 Travelling Showpeople plots in Hounslow over the plan period 2020 to 2041. This includes 11 existing plots at the Baber Bridge Yard in Feltham that will be protected as a Travelling Showpeople site, which therefore reduces Travelling Showpeople housing needs to 15 plots in the borough. <u>The GTTSANA 2019 informs the borough's 10 year target to deliver 26 Gypsy and Traveller pitches and 12 Travelling Showpeople plots by 2030.</u>	For clarification, to explain Hounslow's 10 year pitch and plot target. As per representation from the Mayor of London.
HLP_C5_11	SC9 Accommodation for Gypsies, Travellers and Travelling Showpeople	5.42	127	<u>5.42 To contribute to meeting the remaining 6 pitches of the 10 year Gypsy and Traveller pitch target, where feasible, the existing Hartlands Gypsy and Traveller site in the West of the Borough will be intensified and/or expanded.</u>	To add further explanation for the approach that will be taken to meet the borough's 10 year pitch and plot target. As per representation from the Mayor of London.
HLP_C5_12	SC10 Housing in Multiple Occupation, hostels, bed and breakfast, temporary emergency accommodation	I	130	I. For purpose built or retrofitted temporary emergency accommodation proposals, have regard to the Morris + Company Family Emergency Accommodation Guidance document;	Correction

CHAPTER 6 – CONTEXT AND CHARACTER

Modification code <i>e.g. [HLP_C6_01]</i>	Policy/ map/ figure	Para grap h/Cl ause	Page	Modification	Reason for modification
HLP_C6_01	CC1 Context and Character	B	140	Insert clause H of CC4 after B (and remove from CC4): H. Conserving and enhancing the strategic and local views identified in the Hounslow Characterisation and Growth Study and the Tall Buildings Study, or any subsequent update, that give the borough its character, visual richness and coherence; and by maintaining and updating a schedule of views;	Move to policy CC1 is in response to comments from RBGK and Historic England that views are not of themselves heritage assets and the management of them is more to do with their context, and therefore would better sit in CC1 to enhance clarity of the policy.
HLP_C6_02	CC1 Context and Character	E	140	Optimising redevelopment opportunities, whilst respecting conserving and enhancing the area's distinctive character and historic environment including designated and non-designed heritage assets and their setting; and	Historic England's representation seeks a correction that the terms conserve and enhance should replace the terms protect, preserve, respect, safeguard in line with the NPPF and London Plan.
HLP_C6_03	CC1 Context and Character	F	140	Monitoring and updating the historic environment evidence base , Hounslow Characterisation and Growth Study and Character, Sustainability and Design Codes SPD	Response from RBGK that the monitoring commitment is extended to the historic environment evidence base. Clarification to refer to all relevant evidence base.
HLP_C6_04	CC1 Context and Character	G III	141	Insert clause CC of CC4 after G) III) (and remove from CC4) and amend wording as follows for consistency with the rest of CC1. CC1 G) IV. Conserve and enhance any strategic or local views identified in the Hounslow	Response from Richmond and Kew that the phrasing 'adverse impacts' does not reflect the NPPF and should instead read as 'demonstrate no harmful impacts'

				<p>Characterisation and Growth Study and Character, Sustainability and Design Code SPD and undertake a visual impact assessment to demonstrate no adverse <u>harmful</u> impacts on the designated view or on views from Royal Botanic Gardens Kew World Heritage Site <u>or the buffer zone</u>. Avoid any further harm to the setting and views of the Thames, ensuring any identified significant linear and panoramic views of the Thames are tested to understand the impact of development.</p> <p>Amend clause lettering to match formatting.</p>	<p>Move to policy CC1 is in response to comments from RBGK and Historic England that views are not of themselves heritage assets and the management of them is more to do with their context, and therefore would better sit in CC1 to enhance clarity of the policy.</p>
<i>HLP_C6_05</i>	CC1 Context and Character	G IV	141	<p>Makes best use of redevelopment opportunities whilst respecting <u>conserving</u> and enhancing the <u>significance of the area's historic environment and respecting the area's</u> distinctive character and historic environment <u>as</u>-set out in the Hounslow Characterisation and Growth Study and Character, Sustainability and Design Codes SPD, or any subsequent update.</p>	<p>Historic England's representation seeks a correction that the terms conserve and enhance should replace the terms protect, preserve, respect, safeguard in line with the NPPF and London Plan.</p>
<i>HLP_C6_06</i>	CC1 Context and Character	G VIII	141	<p>Insert clause N) X of CC3 after VIII (and remove from CC3) and amend wording as follows for consistency with the rest of CC1</p> <p>IX) Clearly demonstrates <u>s</u> through appropriate townscape analysis and verified views, how <u>the</u> proposals enhance the townscape, the setting of surrounding heritage assets and local landmarks and positively contribute to the overall skyline and views and protect short, mid and long range views in addition to significant linear and panoramic views and the setting of the Thames;</p>	<p>Responses by LB Richmond and Historic England states that this policy should explain the way views contribute to character and context to enhance clarity of the policy. To avoid repetition this is moved from CC3.</p>

HLP_C6_07	CC2 Urban Design and Architecture	E	143	Working with developers, local communities and other partners to understand and improve the urban design and sustainability of their areas through, for example design codes, design guidance, Supplementary Planning Documents and neighbourhood plans and promote the use of our Design Review Panel to encourage high quality, creative and contemporary design solutions to deliver liveable and connected places with their own strong characters and identities, which are sympathetic to conserve and take opportunities to enhance the area's existing heritage and character;	Historic England's representation seeks a correction that the terms conserve and enhance should replace the terms protect, preserve, respect, safeguard in line with the NPPF and London Plan.
HLP_C6_08	CC2 Urban Design and Architecture	O	144	Create, connect and improve places and the public realm to ensure that they are easy and pleasant to get to and through, foster active lifestyles, are easy to understand and navigate and feel safe (and are perceived to be safe) during the day and night, with a particular focus on walking and cycling pedestrians and cyclists .	Representation from TfL which gives greater clarity on the Policy clause and emphasizes the need for safe spaces.
HLP_C6_09	CC2 Urban Design and Architecture	U	145	Ensure buildings and spaces (including car parks) are designed to stand the test of time and are easily adaptable and resilient to social, economic, technological and climate change, and can accommodate movement, cycle parking and car parking (including alternative uses for car parking) in a safe and useable way.	Representations from TfL which clarifies that the buildings and spaces which are adaptable include car parks.
HLP_C6_10	CC2 Urban Design and Architecture	BB	146	Make well-designed, high-quality provision for bicycles, and the acceptable storage of recycling and refuse, having regard to policies EQ7 and EC2, the Character, Sustainability and Design Codes SPD, relevant London Plan Policy, London Cycling	Representation from TfL which provides text that gives the Policy greater clarity by providing relevant London Plan references.

				Design Standards and any other relevant guidance. Enclosures should be robust, well ventilated and attractively integrated with the site and screened for privacy and security.	
<i>HLP_C6_11</i>	CC3 Tall Buildings	Fig CC3.1	152	Amendment to the Map at Figure CC3.1: Extend Lower Scale Tall Building Definition (green mask) to cover all areas of the borough not covered by the Higher Scale Tall Building Definition. Move the Brentford Label to sit on top of Brentford Town centre instead of over the GWC.	Response from GLA that the mapped definitions should cover the whole borough (including open spaces). Historic England's rep expresses some confusion, saying that Brentford appears in the lower scale definition in the text, however in the higher scale on the map. This is because the Brentford label is placed on the GWC.
<i>HLP_C6_12</i>	CC3 Tall Buildings	Table CC3.2	152	Amend title for table CC3.2 as follows: CC3.2: Maximum permissible Appropriate heights for each location Reformatting of table to highlight header rows.	Response from the GLA that the plan should use the term 'appropriate heights' as per policy D9 Historic England representation seeking clearer presentation of table.
<i>HLP_C6_13</i>	CC3 Tall Buildings	Table CC3.2	152	Amend heading in table CC3.2 as follows: Maximum Appropriate Building Height	Response from the GLA that the plan should use the term 'appropriate heights' as per policy D9
<i>HLP_C6_14</i>	CC3 Tall Buildings	Table CC3.2	152	Swap labels for F3 and F4 around. Browells lane is F4 and Shopping Centre is F3.	To correct a mistake in tall building table.
<i>HLP_C6_15</i>	CC3 Tall Buildings	Fig CC3.3	155-157	Amend Map at Figure CC3.3 as follows:	Response from GLA that requests that a single borough-wide map illustrating areas that may be suitable for tall buildings is

				Map of the full borough with all tall building sites indicated (ie. Figs 3.4-3.8 will be deleted and included on this map) with site boundaries, tall building cluster outlines, focal buildings and local landmarks. Online version to be interactive. Map will also only include the cluster/site codes (removing the height ranges & AOD labels).	more practical than the series of individual maps, and that the maps should avoid identifying detailed indicative layouts and massing scenarios. Response from LB Richmond and Historic England in reference to clarity of mapping
HLP_C6_16	CC3 Tall Buildings	Fig CC3.3	155-157	Removal of existing tall building dots, views and approach views from the tall building maps for clarity and consistency.	For clarity – presentational change.
HLP_C6_17	CC3 Tall Buildings	A	149	Supporting a limited number of tall buildings in Feltham town centre. Tall buildings in this location should be carefully designed to avoid impacting <u>conserve and enhance</u> the setting-significance <u>including any contribution made by setting</u> of St. Catherine’s Church tower and should improve the arrival experience into and the legibility and permeability of the town centre;	Historic England’s representation stated that the term significance should replace other terms, such as character and appearance, architectural/historic/special interest, value and sole references to setting. Historic England’s representation seeking clarity that that it is the significance (including the contribution of setting) of the grade II church tower that needs conserving and enhancing, in particular, its landmark status.
HLP_C6_18	CC3 Tall Buildings	B	149	Supporting a limited number of tall buildings in Brentford town centre. These should be designed carefully and placed <u>sensitively located and designed so as to avoid</u> so as not to have a significant adverse impact on <u>harm to</u> the <u>significance, including any contribution made by</u> setting of views from and between heritage assets including particularly the Royal Botanic	Representations from RBGK, HE and LB Richmond which requested that harm should be referred to instead of significant adverse impact to align with the NPPF. Requests to clarify wording to make meaning clearer

				<p>Gardens Kew World Heritage Site, Syon Park and the Thames foreshore landscape. They should also respect conserve and respond to the area's special townscape and heritage value and protect conserve protected views across the Thames, <u>including those from Richmond;</u></p> <p>C. Supporting tall buildings along sections of the A4 Golden Mile frontage. These should be carefully placed sensitively located and designed so as not to create a wall of tall buildings, ensuring they relate sensitively to surrounding residential areas and do not have a avoid harm to the significance ce, including any contribution made by setting, adverse impact on the setting of, or views from of heritage assets including Gunnersbury Park, Royal Botanic Gardens Kew World Heritage Site, Syon Park and Osterley Park. <u>The remainder of the Corridor has set shoulder heights to protect the significance of heritage assets, as outlined in the Great West Corridor Masterplan;</u></p>	<p>Historic England's representation stated that the term significance should replace other terms, such as character and appearance, architectural/historic/special interest, value and sole references to setting.</p> <p>LB Richmond's representation seeks clarity on the terms shoulder height which are set out in the GWC masterplan and how this relates to the policy.</p>
HLP_C6_19	CC3 Tall Buildings	D and J	149-150	<p>Supporting tall buildings in Hounslow Town Centre that deliver a coherent skyline, aid in legibility and wayfinding and respects and responds to the existing built context;</p> <p>Tall buildings are defined based on their location, taking into consideration the local built context. There are two definitions of tall buildings in the Borough</p>	<p>Historic England's representation stating that to conform with D9 the reference to built should be removed to ensure all context is considered.</p>

HLP_C6_20	CC3 Tall Buildings	F	149	Preserving the predominantly 2 to 3 storey (less than 10m) building heights across the rest of the borough with some limited scope for 4 to 6 storey (up to below 20m <u>including plant and lift overrun</u>) buildings/ elements in identified locations <u>where it is considered they would complement local context</u> , to assist with way-finding <u>and where informed by a full HIA from the applicant</u>	Amendment to provide clarity to the policy in response to reps from HE, RBGK and LB Richmond. Ecoworld make the point that this will align with London Plan and this is agreed.
HLP_C6_21	CC3 Tall Buildings	H	149	H. Undertaking more detailed design analysis including a study to identify spatial sensitivities; and	In response to LB Richmond response for correction to the policy to align with the existing evidence base.
HLP_C6_22	CC3 Tall Buildings	K	150	Be located in the areas identified as having potential for tall buildings, as shown in Fig CC3.1 <u>CC3.3-3.8</u> ;	To correct a mistake in the Reg 19 version which referenced the incorrect figure.
HLP_C6_23	CC3 Tall Buildings	M	150	Add to policy after M and re-letter clauses in turn: <u>N) Be informed by the guidance contained in the ICOMOS method of HIAs, in addition to the London Plan and London Plan Planning Practice Note on Heritage Impact Assessment and the Setting of Heritage Assets;</u>	Response from RBGK requesting that it is made clear that references to these guidance documents are made.
HLP_C6_24	CC3 Tall Buildings	N VIII	150-151	VIII) Demonstrate that development does not harm adversely impact , either individually or cumulatively, on the microclimate of the surrounding area, including wind vortices, noise, the urban heat island effect and over-shadowing-impacts, which should not have an adverse impact on the development site , adjacent sites and public space. Changes to wind microclimate resulting from the development should not be such that the development site, adjacent sites and adjacent public spaces are no longer comfortable	In response to LB Richmond response that requests text clarifications.

				<p>for their intended use. Developers should refer to the Character, Sustainability and Design Codes SPD for further guidance related to microclimate;</p> <p>XI) Carefully consider the façade and overall detailing to ensure visual interest, vertical and horizontal rhythms, an indication of how the building is inhabited, internal thermal comfort and the visual break-up of the building-visually at varying scales;</p>	
HLP_C6_25	CC3 Tall Buildings	N X	151	<p>Clearly demonstrate through appropriate townscape analysis, and verified views <u>and, where applicable heritage impact assessment</u>, how proposals <u>conserve and</u> enhance the townscape, <u>the significance including any contribution made by</u> setting, of surrounding heritage assets and local landmarks and positively contribute to the overall skyline and views and protect <u>conserve and enhance</u> short, mid and long range views in addition to significant line</p>	<p>Amendments in response to reps from HE, RBGK and LB Richmond that policy is amended to separate out the assessment requirements for each topic (townscape, visual and heritage assessment) for clarification.</p> <p>Historic England's representation stated that the term significance should replace other terms, such as character and appearance, architectural/historic/special interest, value and sole references to setting.</p>
HLP_C6_26	CC3 Tall Buildings	N XI	151	<p>Add below X: XI) <u>Undertake a visual impact assessment to ensure all relevant views are examined as part of the application.</u></p> <p>Amend the lettering of following clauses</p>	<p>Amendments in response to reps from HE, RBGK and LB Richmond that policy is amended to separate out the assessment requirements for each topic (townscape, visual and heritage assessment)</p>

HLP_C6_27	CC3 Tall Buildings	N	150	Amend N to part M I)	Correction in response to LB Richmond response that noticed a formatting error.
HLP_C6_28	CC3 Tall Buildings	O	151	Buildings that do not meet the tall building definition, but which are still considered prominent in their surrounding context, for example two to three times the contextual reference height (local scale tall building), must respond appropriately to local contextual building heights and be compatible to their surroundings and the character of the area.	In response to reps from LB Richmond and Historic England seeing clarity.
HLP_C6_29	CC3 Tall Buildings	P	151	Add new point to end of list: <u>Demonstrate consideration of public safety requirements as part of the overall design.</u>	Omission in reg 19 version
HLP_C6_30	CC3 Tall Buildings	6.11	158	6.11 The borough is predominantly low rise, characterised by two to three storey buildings giving a general building height of up to 10m. The majority of medium rise buildings can be found in and around town centres or along main routes such as the London Road. The tall buildings definition in Hounslow is based on local context, with the majority of the Borough being covered by a lower scale tall building definition, which is defined as any building or structure which is over 21m <u>or over</u> in height measured from the ground plane to the roof including the height of any rooftop plant. In parts of the borough where the existing building context height is greater (typically areas with context heights above 15m) there is a higher scale tall building definition, which is defined as any building or structure which is over 30m in height as measured from the	Amendment to provide clarity in response to reps from HE, RBGK and LB Richmond.

				<p>ground plane to the roof, including the height of any rooftop plant. Some parts of the Borough are more sensitive to tall buildings, such as within Chiswick and Brentford town centres where there are many heritage designations and within the Thames Policy Area. Whilst the building context height in these areas exceeds 15m, the lower scale tall building definition applies. <u>The Tall Building definitions are underpinned by the evidence in the Tall Buildings Study, which takes into consideration the Great West Corridor Masterplan when defining tall buildings in this area.</u></p>	
HLP_C6_31	CC3 Tall Buildings	6.15	159	<p>6.15 Where buildings are proposed that do not meet the definition of higher or lower scale tall buildings, but are still taller than their surroundings, proposals should be informed by an understanding of the surrounding built context <u>and a full HIA</u>, referring to other relevant policies in the Local Plan, the Character, Sustainability and Design Codes SPD and the Tall Buildings Study for an understanding of context heights. Tall buildings can be classified into different height categories based on the context height ratio. The following tall buildings classification is established in relation to the context height:</p> <ul style="list-style-type: none"> ☐ Local Scale Tall Building — 2 to 3x context height; ☐ District Scale Tall Building — 3 to 5x context height; and ☐ Metropolitan Scale Tall Building — 5x and above context height. 	<p>Amendment to provide clarity in response to reps from HE, RBGK and LB Richmond.</p> <p>Historic England’s representation stating that to conform with D9 the reference to built should be removed to ensure all context is considered.</p>

				<p>6.16 The area used to establish the context height and the context height ratio will need to reflect the extent of the tall building's impact. Local scale tall buildings can use the context height of their immediate local and wider surroundings, while district scale tall buildings will need to consider heights across a wider area.</p>	
HLP_C6_32	CC3 Tall Buildings	6.17	159	<p>Views, <u>including those from outside the borough boundary</u>, are identified within relevant sections of the Great West Corridor Masterplan, the Tall Buildings Study, the Character, Sustainability and Design Codes SPD and the Royal Botanic Gardens, Kew World Heritage Site Management Plan (2020-2025). All proposals for tall buildings must <u>include an assessment of</u> consider the individual and cumulative visual impacts of proposal in identified views and other locally important views deemed relevant to the proposal, <u>in addition to full leaf winter versions of all views, that include 3D massing models.</u></p>	LB Richmond response which asks the text to refer to views from outside LBH for clarity.
HLP_C6_33	CC3 Tall Buildings	Supporting facts	159-160	<p>The Character, Sustainability and Design Codes SPD (2024), within part A4, provides design guidance relating to tall buildings, presenting design principles for tall building form, <u>including guidance for form, clusters, local character, visualisation, consideration of the natural environment,</u> their relationship to public realm <u>design</u> and how their design should address micro-climatic and sustainability aspects <u>considerations.</u></p>	LB Richmond's representation seeks text that brings in the greater nuance from the tall buildings section of the CSD
HLP_C6_34	CC3 Tall Buildings	Support	160	<p>Add after last bullet: <u>The building shoulder height, is the sheer height of a building at the back of the footway up to the eaves or parapet</u></p>	LB Richmond's representation seeks clarity on the terms shoulder height which are set

		ing facts		<u>height. It is recognised that many buildings may have one or more additional storeys above this height as a set-back element.</u>	out in the GWC masterplan and how this relates to the policy.
HLP_C6_35	CC4 Heritage	B	161	Conserving and taking opportunities to enhance the significance, <u>including any contribution made by setting,</u> made of the borough's network of designated and non-designated heritage assets and their settings , identifying new assets where appropriate and recognising the cumulative positive impact of heritage assets in a given area in consultation with the borough's local history societies and residents. We will use Article 4 directions where appropriate to enhance conservation of character or fabric;	Historic England's representation should state that the term significance or significance including contribution made by setting should replace other terms such as character, architectural appearance, architectural/ historical/ special interest, value, and sole references to setting (because setting is not separate to significance)
HLP_C6_36	CC4 Heritage	D	161	Working with Royal Botanic Gardens Kew World Heritage Site, London Borough of Richmond and Historic England <u>and the Thames Landscape Strategy</u> to conserve and enhance the outstanding universal values of The Royal Botanical Gardens Kew World Heritage Site, its buffer zone and its setting, including views to and from this asset. This includes assisting in the <u>drafting and implementation of the World Heritage Site Management Plan and its provisions, giving appropriate weight to the provisions of the Management Plan in the decision making process, asking developers to consult and meet with Kew during formulation of their proposals both before and during any pre-application process and following any eventual submission of a proposal for consideration for planning</u>	Comments from RBGK and LB Richmond that the policy should support early meaningful pre-app engagement by the applicant with appropriate levels of details where there is the potential for the WHS to be impacted. The representations also request that the policy states that appropriate weight is given to the provisions in the Management Plan during the decision making process.

				<u>permission, to ensure the OUV of Kew is not harmed unless there are wholly exceptional circumstances in accordance with the NPPF;</u>	
HLP_C6_37	CC4 Heritage	E	161	Promoting the appropriate re-use of vacant or underused historic buildings, heritage assets and settings , including improvements to open spaces and public realm and supporting schemes that conserve the significance of, and provide the heritage asset with a sustainable, long-term use;	Historic England's representation should state that the term significance or significance including contribution made by setting should replace other terms such as character, architectural appearance, architectural/ historical/ special interest, value, and sole references to setting (because setting is not separate to significance)
HLP_C6_38	CC4 Heritage	F	161	Bring heritage assets back into meaningful use where they have been left empty, abandoned or underused, including using enabling development where appropriate <u>as a final option</u> and consistent with their conservation;	Historic England's response asking that reference to enabling development where appropriate is removed as it should only be as a last resort- policy changes clarify this approach.
HLP_C6_39	CC4 Heritage	K	162	Conserve <u>the significance of heritage assets, giving great weight (and the more important the asset, the greater the weight should be) to a designated heritage asset's conservation and balanced weight to the conservation of a non-designated heritage asset.</u> , safeguard and take opportunities to enhance any heritage asset, its historic integrity, character, appearance and its setting in a manner appropriate to its significance, giving great weight to the assets conservation and avoid any further harm to the setting, views and significance of designated heritage assets;	Historic England's representation seeking clarity that the policy also includes non-designated heritage assets. Deletion of O to avoid repetition.

				O. Have full regard to any harm to, or loss of, the significance of a non-designated heritage asset, including from both direct and indirect effects. Non-designated heritage assets include locally listed buildings, Archaeological Priority Areas and areas of special local character.	
HLP_C6_40	CC4 Heritage	L	162	Retain, conserve. Restore and reuse a heritage asset in a manner appropriate to its value and significance	Historic England's representation should state that the term significance or significance including contribution made by setting should replace other terms such as character, architectural appearance, architectural/ historical/ special interest, value, and sole references to setting (because setting is not separate to significance)
HLP_C6_41	CC4 Heritage	M	162	Demonstrate that substantial harm to or loss of a heritage asset, <u>its significance</u> is avoided in the first instance...	Historic England's representation should state that the term significance or significance including contribution made by setting should replace other terms such as character, architectural appearance, architectural/ historical/ special interest, value, and sole references to setting (because setting is not separate to significance)
HLP_C6_42	CC4 Heritage	R	162	CC4.R Have full regard to the significance of the heritage assets including the setting of, and views to and from, such assets; and Amend policy numbering to align with this	Historic England's representation requesting clarification as to why this is included as a separate criterion when it is the key metric and should be clear throughout.

HLP_C6_43	CC4 Heritage	S and Z	162, 164	<p>Consult the historic environment record, whoever is administering it, <u>Greater London Historic Environment Record (GLHER)</u> when developing proposals.</p> <p>CC4.Z We will require any nationally important remains and their settings to be preserved permanently in situ, subject to consultation with Historic Englandthe <u>Greater London Archaeological Advisory Service</u> as the borough's archaeological adviser. If preservation in situ is required the development proposal will need to accommodate this, <u>including an appropriate setting, public access and interpretation</u> in the design.</p>	<p>Historic England's representation seeks a correction to the name of the historic environment record.</p> <p>Historic England advise correction to the text that conserving a setting in situ is not meaningful and should further clarify this statement.</p>
HLP_C6_44	CC4 Heritage	T	163	<p>I. It is in keeping with the character of the building and harmonious with its surroundings and the wider character of the area; and, with particular respect to listed buildings or identified aspects of locally listed buildings, it preserves <u>conserves</u> their special architectural or historic character and any features they may possess.<u>significance;</u></p> <p>CC4.T III. Opportunities to mitigate or adapt to climate change through the retention, retrofit, reuse or adaptation are maximised as long as this is not to the detriment of important aspects of character;<u>significance;</u></p> <p>CC4.T IV That it maintains the character <u>significance</u> of interiors...</p>	<p>Historic England's representation should state that the term significance or significance including contribution made by setting should replace other terms such as character, architectural appearance, architectural/ historical/ special interest, value, and sole references to setting (because setting is not separate to significance)</p> <p>Historic England's representation seeking clarity that any</p>

HLP_C6_45	CC4 Heritage	U	163	Any development within or affecting a Conservation Area must conserve and take opportunities to enhance the character <u>significance</u> of the area and respect the grain, scale, form....	Historic England's representation should state that the term significance or significance including contribution made by setting should replace other terms such as character, architectural appearance, architectural/ historical/ special interest, value, and sole references to setting (because setting is not separate to significance)
HLP_C6_46	CC4 Heritage	W	163	<p>Conserve and enhance and safeguard the historic integrity, character and appearance and avoid any further harm to the internationally recognised <u>the</u> Outstanding Universal Value, <u>authenticity and integrity</u> of the Royal Botanic Gardens Kew World Heritage Site, its Buffer Zone and its significance, setting, including views to and from the site.</p> <p><u>World Heritage sites are of the highest significance and their conservation should be given the greatest weight.</u></p> <p>Add to 6.20: We will expect heritage statements to accompany all proposals affecting heritage assets and Heritage Impact Assessments to accompany all major proposals affecting heritage assets. These should include a description of the significance of any heritage assets and their settings affected and an analysis of the resultant impact of the development on the significance of the heritage asset and its setting. The level of detail of this material should be proportionate to</p>	In response to reps from LB Richmond and Historic England that the policy text is aligned with the terminology used in the PPG in relation to WHS and their OUV. Supporting text added to clarify the policy text additions.

				<p>the significance of the asset affected. <u>Applications for development proposals likely to have an impact on the Royal Botanic Gardens Kew World Heritage Site or its Buffer Zone will be required to provide 3D massing models to enable assessment of cumulative impact of development where relevant. It is expected that there will be meaningful engagement with the London Borough of Richmond upon Thames and Royal Botanic Gardens Kew early in the process, and with an appropriate amount of detail accompanying an application, where development is likely to impact on the Royal Botanic Gardens Kew World Heritage Site or its buffer. Developers are strongly encouraged to engage in pre-application discussions early in their thinking prior to submitting a planning application likely to impact on the Royal Botanic Gardens Kew World Heritage Site and its Buffer Zone. This process should involve engagement in a planning performance agreement (PPA) that sets a framework for the Council's consideration of a proposal and engagement with an appropriate Design Review Panel.</u></p>	
HLP_C6_47	CC4 Heritage	X-Z	163	<p>CC4 x-z: SITES OF ARCHAEOLOGICAL IMPORTANCE <u>HERITAGE ASSETS OF ARCHAEOLOGICAL INTEREST</u></p>	Historic England's rep seeking correction to the title for consistency and accuracy.
HLP_C6_48	CC4 Heritage	X and BB	163-164	<p>X: We will expect the development proposal to submit an Archaeological Evaluation Report <u>Desk Based Assessment (DBA)</u> is the proposal falls</p>	Historic England's representation seeking correction to terminology of a desk based assessment and to amend terminology of

				<p>within or adjacent to an Archaeological Priority Area, with advice on the appropriate mitigation measures in cases where excavation <u>further investigation</u> is justified.</p> <p>CC4.BB Conserve and enhance a scheduled monument and its setting if affected. Proposals must assess and submit an evaluation report a <u>Desk Based Assessment (DBA)</u> if the proposal affects a scheduled monument, with advice on the appropriate mitigation measures in cases where excavation <u>further investigation</u> is justified.</p>	evacuation to further investigation for clarity.
HLP_C6_49	CC4 Heritage	BB	163	<p>Conserve and enhance <u>the significance, including any contribution made by setting, of</u> a scheduled monument and its setting.</p>	Historic England's representation should state that the term significance or significance including contribution made by setting should replace other terms such as character, architectural appearance, architectural/ historical/ special interest, value, and sole references to setting (because setting is not separate to significance)
HLP_C6_50	CC4 Heritage		164	<p>REGISTERED HISTORIC PARKS AND GARDENS CC4.DD. <u>Where appropriate, non-designated historic parks are required to be assessed for registration or local listing.</u> Consider adding to the list and encouraging pConservation and enhancement <u>are required</u> through appropriate management measures.</p>	<p>Representation from Historic England that seeks a correction to the title and clarification that there is one criterion requiring that non-designated parks are assessed for registration</p> <p>Historic England's representation seeks a correction that the terms conserve and enhance should replace the terms protect,</p>

					preserve, respect, safeguard in line with the NPPF and London Plan.
HLP_C6_51	CC3 Tall Buildings	6.14	158-159	The sites identified as appropriate for tall buildings have been informed by a detailed local urban design assessment, which took into account a variety of considerations including public transport accessibility levels, green and blue infrastructure, planned growth and <u>locations of heritage assets</u> amongst other factors to understand areas where there is potential for tall buildings. The remit of this study did not include assessment of all the potential impacts of a tall buildings, such as sunlight and daylight impacts, therefore tall buildings are not automatically acceptable on the identified sites in Table CC 3.2 and will be required to justify their approach towards height and built form and evaluate the benefits and justification for a tall building in relation to surrounding context, <u>impacts on significance, including any contribution made by setting of heritage assets</u> , views and townscape.	Historic England's representation stated that the term significance should replace other terms, such as character and appearance, architectural/historic/special interest, value and sole references to setting. Historic England's representation seeking clarity on wording on the scope of the Tall Building's Study's assessment of historic assets.
HLP_C6_52	CC4 Heritage	6.19	164	Listed Buildings <u>Heritage</u> at Risk Add new para below 6.19: <u>Archaeological Priority Areas (APAs) are defined areas where there is a significant known archaeological interest or potential for new discoveries. A total of 28 new Archaeological Priority Areas have been identified within the London Borough of Hounslow. These comprise five Tier 1 APAs, twenty-one Tier 2 APAs and two Tier 3 APAs. The tiers vary depending on the archaeological</u>	Representation from Historic England seeking correction to title to include all heritage assets. Representation from Historic England seeking clarification in the supporting text on what the APAs are and how they are tiered.

				<p><u>significance and potential of that area and indicate when there is a need to understand the potential impact of the proposed development on the heritage asset's significance. The type of planning application and the tier level it is in indicate the likelihood that archaeology will be a consideration in reaching a planning decision. Information on the APAs and their heritage significance can be found in the Hounslow Archaeological Priority Areas Appraisal (2023).</u></p>	
HLP_C6_53	CC4 Heritage	6.18 – 6.20	164- 165	<p>6.18 The borough enjoys a network of heritage assets and aspects that defines its origins and illustrates distinctiveness. A heritage asset can be a landscape, place, building, monument or feature that has been identified as having special architectural or historic interest. Within the borough, these range from Grade I statutorily Listed Buildings such as Syon House, located with other listed buildings in registered Syon Park and lying within Isleworth Riverside's designated conservation area, to individual or groups of buildings that are locally listed for their contribution to an area's character.</p> <p>Break for new para:</p> <p><u>6.19</u> Outside the borough, the Royal Botanic Gardens, Kew World Heritage Site lies in the London Borough of Richmond. Its international importance is set out in the Statement of Outstanding</p>	<p>Comments from RBGK that reference to the ICOMOS guidance on HIAs is added to supporting text.</p> <p>Historic England's representation that the supporting text should be expanded to explain the other designated assets that cover particular aspects of the WHS and an overview of elements of setting that contribute to the OUV of the WHS both within and beyond the buffer zone and what the arcadian Thames is and its relationship to Kew. They state that this would be in line with London Plan Policy HC2.A.</p>

			<p>Universal Value and part of its buffer zone falls within the London Borough of Hounslow; <u>Buffer Zones are identified in the Operational Guidelines for the Implementation of the World Heritage Convention (2017) as an optional measure for protecting the OUV of World Heritage Sites. Not all World Heritage Sites have a Buffer Zone nor do all sites require them. The buffer zone of the RBG Kew WHS encompasses areas of land with strong historical relationships to the Gardens (the Old Deer Park, Syon Park and Kew Green), some locations that are important to the protection of significant views (e.g. Syon Park); and areas that have a bearing on the character and setting of the gardens (the River Thames and its islands between Isleworth Ferry Gate and Kew Bridge; and approaches to the Gardens from the east). These assets, including RBGK, all form part of the Arcadian Thames Landscape (itself a heritage asset), whose character is further detailed in the Thames Landscape Strategy. Development in and outside this Buffer Zone may threaten the setting and significance of RBGK. Furthermore, the buffer zone does not encompass all of the setting of the WHS and change outside of the buffer zone could affect the setting of the WHS.</u></p> <p>New paragraph:</p> <p><u>6.20</u> Syon Park is specifically mentioned as being the focus of one of the garden vistas on the opposite banks of the Thames. Its setting includes,</p>	
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				<p>affects and contributes to the borough, including Syon Park. We have a duty to assist in preserving Royal Botanic Gardens Kew's Outstanding Universal Value which includes a rich and diverse historic landscape and an iconic architectural legacy, which in turn provides benefit in <u>significance, including contribution made by setting to</u> views and character to, and recognition of the assets of the London Borough of Hounslow. <u>The International Council on Monuments and Sites (ICOMOS) method of Heritage Impact Assessment for World Heritage Sites as well as the London Plan and the Mayor of London's SPG on London's World Heritage Sites will be taken into account when assessing proposals. Proposals will be carefully scrutinised for their likely effect on the Royal Botanic Gardens, Kew World Heritage Site or its setting where these occur within the defined buffer zone and wider and more extensive setting of the World Heritage Site, including views to and from the site.</u></p> <p>Amend paragraph numbering to fit format</p>	<p>Historic England's representation should state that the term significance or significance including contribution made by setting should replace other terms such as character, architectural appearance, architectural/ historical/ special interest, value, and sole references to setting (because setting is not separate to significance)</p>
HLP_C6_54	CC4 Heritage	6.20	165	<p>These should include a description of the significance of any heritage assets, <u>including contribution made by setting, and their settings</u> affected and an analysis of the resultant impact of the development on the significance of the heritage asset and its setting...</p>	<p>Historic England's representation should state that the term significance or significance including contribution made by setting should replace other terms such as character, architectural appearance, architectural/ historical/ special interest, value, and sole references to setting (because setting is not separate to significance)</p>

HLP_C6_55	CC4 Heritage	6.20	165	<p>We will expect heritage statements to accompany all proposals affecting heritage assets and Heritage Impact Assessments to accompany all major proposals affecting heritage assets. These should <u>be undertaken by qualified heritage professionals</u> and include a description and understanding of the significance of any heritage assets and their settings affected and an analysis of the resultant impact of the development on the significance of the heritage asset and its setting. The level of detail of this material should be proportionate to the significance of the asset affected, <u>sufficient to understand the potential impact on significance and consider cumulative effects.</u></p>	<p>Historic England's representation which seeks clarification that the HIAs should be undertaken by qualified professionals and understand cumulative impacts.</p>
HLP_C6_56	CC4 Heritage	Notes	166	<p>The Royal Botanic Gardens Kew has published a range of guidance to inform planning decisions relating to heritage, including the Royal Botanic Gardens Kew World Heritage Site Management Plan (2020-2025) <u>and the CBA Royal Botanic Gardens Kew World Heritage Site Setting Study (2019). The UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022) should be referred to for conducting and reviewing impact assessment for all World Heritage properties.</u> and the Statement of Outstanding Universal Value. <u>Other relevant documents include the Thames Strategies and documents that are part of the Council's</u></p>	<p>Representation seeking correction of the primary source for the statement of OUV and that for clarity the CBA <i>Royal Botanic Gardens Kew World Heritage Site Setting Study</i> (2019) and the UNESCO (2022) <i>Guidance and Toolkit for Impact Assessments in a World Heritage Context</i> are included, along with the APA and Thames Strategies documents and any relevant LBH strategies.</p>

				<u>evidence base including Conservation Areas Appraisals, the Great West Corridor Masterplan and the Tall Buildings Study.</u>	
<i>HLP_C6_57</i>	CC5 Advertiseme nt Panels, Hoardings and Structures	B	167	Ensuring that advertisements do not adversely impact on the setting <u>significance</u> of heritage assets, <u>including any contribution made by setting</u> , the skyline or the amenity of residential properties. Any impact will be assessed in terms of its significance;	Historic England’s representation should state that the term significance or significance including contribution made by setting should replace other terms such as character, architectural appearance, architectural/ historical/ special interest, value, and sole references to setting (because setting is not separate to significance)
<i>HLP_C6_58</i>	CC5 Advertiseme nt Panels, Hoardings and Structures	J	168	Demonstrate that the advert is sensitively placed and designed to not adversely impact sensitive heritage locations , the significance <u>setting</u> of heritage assets, <u>including any contribution made by setting</u> , and strategic or local views;	Historic England’s representation should state that the term significance or significance including contribution made by setting should replace other terms such as character, architectural appearance, architectural/ historical/ special interest, value, and sole references to setting (because setting is not separate to significance)
<i>HLP_C6_59</i>	CC5 Advertiseme nt Panels, Hoardings and Structures	L	168	Demonstrate that the advertisement, its illumination, and associated structure makes a positive contribution to amenity and will not adversely impact (or cumulatively impact) on the amenity of residential areas or pedestrians and vehicle movement and safety by being sensitively designed in terms of their size, location and degree of illumination, their impact on the local	Historic England’s representation should state that the term significance or significance including contribution made by setting should replace other terms such as character, architectural appearance, architectural/ historical/ special interest, value, and sole references to setting

				context, street-scene, the building on which some are displayed, the significance of designated and non- designated heritage assets including contribution made by their settings and wider townscape;	(because setting is not separate to significance)
<i>HLP_C6_60</i>	Heritage Designation Map	Fig CC1	170	<p>Include the APA tiers coloured to their importance</p> <p>Amend key to say Scheduled Monuments</p> <p>Amend key to say Registered Parks and Gardens</p> <p>Add tall building higher and lower definition zones.</p>	Historic England's representation seeking a correction in reference to 'Scheduled Ancient Monuments', which should be amended to 'Scheduled Monuments' and to clarify that the map is showing just Registered Parks and Gardens. Representation also seeks that listed and locally listed buildings are shown on the map
<i>HLP_C6_61</i>	CC3	L	150	Not exceed there (replace maximum with appropriate building heights for that site or area, as set out Table CC 3.2.	Comment from Gillette site and to align with London Plan policy.

CHAPTER 7 – GREEN AND BLUE INFRASTRUCTURE

Modification code <i>e.g. [HLP_C7_01]</i>	Policy/ map/ figure	Paragraph/Clause	Page	Modification	Reason for modification
HLP_C7_01	GB4 The Green Infrastructure Network	7.15	179-180	<p>The borough’s green infrastructure network includes its open spaces and nature conservation areas, as well as residential gardens which play an important role in connecting green spaces across urban areas. Green links in the borough include the River Thames, River Brent and Grand Union Canal, the Crane Corridor and Duke of Northumberland’s River, which connect with adjoining boroughs and districts. The quality of access to and along green links, chains and corridors varies across the borough, from the relatively well-maintained Thames Path (a National Trail) to less well maintained areas in the west of the borough and around the River Brent and Grand Union Canal. The Council will continue to promote initiatives to improve sustainable travel and maximise the use of green links, chains and corridors to improve access and connectivity in line with the GBIS. Guidance on actions to promote climate and environmental resilience (including adaptation measures and other nature based solutions) will be set out in the emerging Hounslow Climate Change Resilience Plan.</p>	Consistency and clarity, as per Canal & River Trust representation.

CHAPTER 8 – COMMUNITY INFRASTRUCTURE

Modification code <i>e.g. [HLP_C8_01]</i>	Policy/ map/ figure	Paragraph/Clause	Page	Modification	Reason for modification
HLP_C8_01	CI 1 Providing and Protecting Community Facilities	8.1	196	<p>Accessible community facilities offering a wide range of uses in sustainable locations increase the opportunity for our residents to lead healthy, prosperous and socially cohesive lives. By protecting against the loss of existing community facilities that serve the community, these uses can continue to operate alongside wider regeneration or redevelopment, or have the opportunity to benefit from upgraded, accessible and co-located facilities through new development schemes. The council must be sufficiently assured that a given community use is not appropriate to continue on a site, or that an equivalent is being provided elsewhere, to permit a change of use which would result in a loss of a community facility. This should be demonstrated either by the submission of evidence of sufficient marketing <u>and other robust evidence that the use is no longer required by the operator and the catchment area. Where agreed, or by the inclusion within the development proposal of the</u> details of <u>the</u> re-provision of the existing community use elsewhere at an equivalent capacity <u>should be provided with the development proposal.</u> The</p>	For clarity and consistency, as per Sport England representation.

				<p>marketing evidence should include the following to be considered sufficient:</p> <ul style="list-style-type: none"> · Agent(s) and media used (press articles and advertisements); · Interest in the site/premises (including reasons for prospective tenants not taking up space and how these problems have been addressed); · Evidence that the rental levels offered have been competitive (including the offer of renewal of lease to existing tenants at a reasonable rate); and · Flexibility in space offered including dividing up large areas of floorspace where this is possible. 	
HLP_C8_02	CI5 Places of Worship	B V		<p>There will be sufficient off-street car parking to accommodate the anticipated users of the place of worship at both normal and peak times of use, while Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite') in accordance with the standards set out in Policy T6 of the London Plan.</p>	<p>Alteration to the Policy wording in accordance with representation received from TfL to ensure that car free development should be the starting point where sites are well connected with car-lite elsewhere.</p>

CHAPTER 9 – ENVIRONMENTAL QUALITY

Modification code <i>e.g. [HLP_C9_01]</i>	Policy, clause / map/ figure	Paragraph	Page	Modification	Reason for modification
HLP_C9_01	EQ10 Minerals	9.28	230	<p>Following a search for suitable locations, two sites have been allocated for potential aggregate extraction: Rectory Farm and Land South of Western International Market in the borough’s west. The Minerals Background Report 2011 also identifies other sites with mineral reserves and a railhead used for aggregate distribution and associated operations (namely, the site at Transport Avenue) which will be safeguarded. This safeguarding will not necessarily preclude other forms of development, rather establishing the presence of mineral resources <u>in the case of safeguarded minerals sites</u>, or <u>the rail head infrastructure and</u> associated distribution/processing facilities in the case of the railhead.</p> <p><u>9.29 In the context of the Transport Avenue site, safeguarding for the bulk transport and handling of minerals, the manufacture of concrete and the handling, processing and distribution of recycled and secondary aggregate material is required by both the NPPF and Policy SI10 Aggregates of the London Plan on the basis that this is vital to the sustainable movement of such materials. By safeguarding the Minerals Railhead</u></p>	<p>Clarity.</p> <p>As per Day Group Ltd representation.</p>

			<p><u>facility, the Council will ensure that any development either within the site or in the surrounding area does not prejudice the existing or future operation of the safeguarded site and the operations it supports.</u></p> <p>9.30 Should extraction take place at Rectory Farm, Land South of Western International Market, or indeed any other sites, negative impacts, such as transport movements, should be mitigated. Legacy should be considered through aftercare, restoration and reuse.</p>	
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CHAPTER 10 – ENHANCING CONNECTIVITY

Modification code <i>e.g. [HLP_C10_01]</i>	Policy/ map/ figure	Paragraph/Clause	Page	Modification	Reason for modification
HLP_C10_01	EC1 Strategic Transport Connections	Table EC1.1	234	<p><u>Improving Orbital and Overground Rail Connections</u></p> <p>‘This proposed scheme would provide a connection to Crossrail <u>the Elizabeth line and HS2 could be completed by the early 2030s, providing improved transport capacity and connectivity to the strategic Old Oak Common area</u> and is connected to the wider business case for High Speed Two, though the connection could be implemented earlier.’</p> <p><u>Improving Surface Level Access to Heathrow Airport</u></p> <p>‘Proposed southern public transport improvements to Heathrow Airport, with services originating from London Waterloo <u>Clapham Junction</u> using the South West Railway network and serving stations within the borough.</p>	As requested by TfL rep these proposed modifications give greater clarity.
HLP_C10_02	EC2	A	236	Promoting ‘car-free’ or ‘low car’ development where appropriate , as well as car clubs and car sharing schemes <u>where appropriate</u> in line with London Plan Policy T6 and T6.1 – <u>T6.5</u> .	As requested by TfL rep these proposed modifications give greater clarity.

HLP_C10_03	EC2	C	236	Preparing site specific development briefs where relevant, for strategic sites that include existing publicly accessible car parks, to ensure that where justified public sufficient car parking is retained to meet essential local needs.	As requested by TfL rep these proposed modifications give greater clarity.
HLP_C10_04	EC2	I	236	‘Developments should provide a minimum number of cycle parking spaces and an appropriate maximum number of car parking spaces consistent with the standards in the London Plan, London Cycling Design Standards and the WestTrans West London Cycle Parking Guidance and any subsequent guidance.’	As requested by TfL rep these proposed modifications give greater clarity.
HLP_C10_05	EC2	P	237	Add in the words ‘or equal equivalent’ to Policy EC2 (P) to give further clarity on CLOCS. “Construction Logistics Plans should be submitted for larger schemes or sites in sensitive locations and the developers and contractors are expected to follow CLOCS (Construction Logistics and Community Safety) or equal equivalent; ”	As requested by SEGRO in rep.
HLP_C10_06	EC2	N	237	‘Prepare Travel Plans, Healthy Streets Checks and Assessments and Active Travel Zone assessments and Parking Design and Management Plans in accordance with latest guidance from Transport for London or any subsequently adopted guidance.’	As requested by TfL rep these proposed modifications give greater clarity.

HLP_C10_07	EC3	C	239	Giving due consideration to the International Civil Aviation Authority's <u>Organisation (ICAO)</u> Guidance on the Balanced Approach to Aircraft Noise Management when making decisions regarding the airport or those parts of the borough affected by the airport;	To give correct reference to the "International Civil Aviation Organisation (ICAO)" as per Tfl's rep.
HLP_C10_08	EC3	E	239	Promoting increased surface access provision to Heathrow Airport, by working with partners to improve public transport connections, walking and cycle infrastructure, and utilising the road network more efficiently.	To give greater clarity in regards to journey trips to Heathrow as per Tfl's rep.
HLP_C10_09	EC4	E	242	Demonstrate that adverse impacts <u>to the significance of</u> on heritage assets, conservation areas, archaeological sites, <u>and to</u> open spaces and Green Belt, areas of landscape importance and biodiversity are avoided <u>and minimised</u> ; and	In response to Historic England's representation which seeks correction of terminology related to impacts on the significance of heritage assets.
HLP_C10_10	Enhancing Connectivity	Fig EC1	243	The map of strategic transport connections and improvements could be enhanced to clearly illustrate the Council's aspirational walking and cycling network in line with the Sustainable Transport, Walking and Cycling London Plan Guidance, published in November 2022.	In response to GLA Rep in order to improve clarity and consistency of EC1.1
HLP_C10_11	Enhancing Connectivity	Fig EC1	243	Change label 'Brent River <u>& Grand Union Canal</u> Walk'	For accuracy and consistency

					As requested by the Canal & River Trust (Reg19 rep).
<i>HLP_C10_12</i>	Enhancing Connectivity	Fig EC1	243	The map of strategic transport connections and improvements needs to be updated to better illustrate the West London Orbital rail link (eg remove spur to Kew Bridge station, add and label station locations). It would also be helpful if strategic cycleway improvements could be shown more clearly. The map should show the aspirational walking and cycling networks including strategic and cross boundary links and existing routes that need upgrading to meet new quality criteria from TfL.	Amend map as per TfL rep.

CHAPTER 11 – IMPLEMENTING STRATEGY

Modification code <i>e.g. [HLP_C11_01]</i>	Policy/ map/ figure	Paragraph/Clause	Page	Modification	Reason for modification
HLP_C11_01	IMP	K	248	Mitigate the impacts of the development on the area through a section 106 agreement, where necessary or appropriate, having regard to the Planning Obligations and CIL supplementary planning document; and	Correction
HLP_C11_02	IMP	N	248	Mitigate the impacts of development on the transport highway network, including through securing any necessary <u>public transport and active travel infrastructure, service improvements to provide capacity or improved accessibility and connectivity, and/or</u> highways works in agreement with the appropriate highways authority.	For clarification and consistency, in line with TfL representation.

CHAPTER 12 – SITE ALLOCATIONS

Modification code	Site Allocation	Section	Page no.	Modification	Reason for modification
<i>e.g.</i> [HLP_SAXX_01]					
HLP_SA1_01	1- SKY CAMPUS BRENTFORD	Final sentence of "Heritage Constraints" section	258	Development is required to conserve/preserve, and/or seek opportunities to enhance the historic environment where potential impacts upon heritage have been identified.	For correction – to remove duplicated text.
HLP_SA3_01	3 – GILLETTE FACTORY	Key Proposal	262	Gillette Corner will become a major new creative hub drawing on its unique heritage to deliver flexible creative film, digital and media including studios and their supporting uses making the most of the building's large floorplates and attractive features. <u>The site is a mixed use allocation which as a result removes the Strategic Industrial Location (SIL) designation from part of the site which therefore becomes non-designated, as shown on the Hounslow Local Plan 2020-2041 Policies Map.</u>	Wording to be added after the first sentence of the key proposal section for clarification. To provide clarity regarding how the previous Strategic Industrial Location (SIL) designation at the site will change. As per representation from the Mayor of London.
HLP_SA5_01	5 – WEST CROSS CAMPUS	Key Proposal	266	The West Cross Campus will become a high-quality mixed-use quarter of industrial and other employment uses, in a range of unit sizes, co-located with housing and shared amenities creating a sense of an 'industrial life'. <u>The site is a mixed use allocation which as a result removes the Strategic Industrial Location (SIL) designation from part of the site which therefore becomes non-designated,</u>	Wording to be added after the first sentence of the key proposal section for clarification. To provide clarity regarding how the previous Strategic Industrial Location (SIL) designation at the site will change. As per representation from the Mayor of London.

				<p><u>as shown on the Hounslow Local Plan 2020-2041 Policies Map.</u> It is a major opportunity for transformation and intensification to take forward the Mayor of London's Policy for industrial intensification and co-location with residential uses.</p>	
HLP_SA6_01	6 - BSS BRENTFORD	Planning designations	267	<p><u>Strategic Industrial Location (SIL): Part of the site is designated SIL. Proposals within SIL should, where feasible, intensify uses suitable for broad industrial-type activities and make consideration of impact of development on existing occupiers in accordance with the agent of change principle. Colocation of residential development with industrial development is supported in the allocation outside the boundary of the SIL.</u></p> <p>Site is <u>also</u> adjacent to SIL and access route; consideration of impact of development on existing occupiers in accordance with the agent of change principle and regard had to the impact of traffic movements servicing these.</p>	Wording to be added at the start of the Planning designations section to clarify that part of the site is a Strategic Industrial Location (SIL) designation, to set out requirements that will be expected for proposals within SIL and to provide clarity that the area of the site located outside of SIL is suitable for colocation development. As per representation from the Mayor of London.
HLP_SA6_02	6 - BSS BRENTFORD	Key Proposal	268	<p>The BSS Brentford Site will be redeveloped and intensified to support a broader range of uses. <u>The site is a mixed use allocation which as a result removes the Strategic Industrial Location (SIL) designation from part of the site which therefore becomes non-designated, as shown on the Hounslow Local Plan 2020-2041 Policies Map.</u></p>	Wording to be added after the first sentence of the key proposal section for clarification. To provide clarity regarding how the previous Strategic Industrial Location (SIL) designation at the site will change. As per representation from the Mayor of London.
HLP_SA7_01	7 – PROFILE WEST BRENTFORD CAR PARK	Key Proposal	270	<p>The Profile West Car Park will form a key link between Boston Manor Park and the Golden Mile Station and an attractive entrance to Transport Avenue. <u>The Strategic Industrial Location (SIL) designation is removed from the site, which</u></p>	Wording to be added after the first sentence of the key proposal section for clarification. To provide clarity regarding how the previous Strategic Industrial Location (SIL) designation at the site will change.

				<u>therefore becomes non-designated, as shown on the Hounslow Local Plan 2020-2041 Policies Map.</u>	As per representation from the Mayor of London.
HLP_SA9_01	9 – SYON LANE INDUSTRIAL ESTATE	“Key proposal” section	274	The Syon Lane Industrial Estate will be redeveloped to increase industrial uses on the site while protecting <u>conserving</u> the Grade II listed Syon Clinic building.	For correction – to remove the term ‘protect’ from allocation wording and replace this with conserve, in line with the NPPF and London Plan. As per Historic England’s representation.
HLP_SA13_01	13 – HARLEQUIN AVENUE SUB STATION	Key Proposal	280	Harlequin Avenue sub-station will be redeveloped to provide a number of residential units with modern and flexible business floorspace which integrates with the surrounding business uses. <u>The Strategic Industrial Location (SIL) designation is removed from the site, which therefore becomes non-designated, as shown on the Hounslow Local Plan 2020-2041 Policies Map.</u>	Wording to be added after the first sentence of the key proposal section for clarification. To provide clarity regarding how the previous Strategic Industrial Location (SIL) designation at the site will change. As per representation from the Mayor of London.
HLP_SA27_01	27 - KEW BRIDGE DISTRIBUTION CENTRE	Movement and Access	301	<u>‘Development is to conform to the maximum parking standards in the London Plan while maximising access by walking, cycling and public transport’</u>	Wording to be added in the Movement and Access section for clarity and consistency as per the representation from TFL.
HLP_SA27_02	27 - KEW BRIDGE DISTRIBUTION CENTRE	Existing Use	301	Research and Product Development (B1(b) E(g)ii) Light industrial (B1(C) E(g)iii); General Industrial (B2) and Warehousing (B8)	For correction. To reflect the use classes order (as amended in 2020).
HLP_SA27_03	27 - KEW BRIDGE DISTRIBUTION CENTRE	Land Uses	302	Light Industrial (B1(C) E(g)iii), Industrial (B2/8), Business (B1a/b E(g)i/ii) , Residential (C3)	For correction. To reflect the use classes order (as amended in 2020).
HLP_SA43_01	43 - HEATHROW INTERNATIONAL	Movement and Access	322	Access to the site should be maintained from Green Lane, with any proposed vehicular access to the A312 to be agreed with TfL. <u>Access should not increase road danger and</u> should be designed to minimise impact on active travel modes. Access	Wording to be added in the Movement and Access section for clarity and consistency as per the representation from TFL.

	TRADING ESTATE			should also contribute towards meeting the modal shift targets in the London Transportation Plan by providing safe and pedestrian friendly walking and cycling accesses and routes to and from nearby centres and public transport hubs, and rebalancing design in favour of pedestrians and cyclists to the site through features such as pavement width, separated routes, landscaping, lighting and other measures.'	
HLP_SA48_01	48 – VACANT LAND AT DICK TURPIN WAY	Movement and Access	329	Appropriately designed vehicular access to the site should be provided from the A30 Great South West Road or Faggs Road . Vehicular access should be designed to minimise impact on active travel modes. Pedestrian and cycle access should be provided to the Great South West Road, Dick Turpin Way and Faggs Road. It should also contribute towards meeting the modal shift targets in the London Transportation Plan by providing safe and pedestrian friendly walking and cycling accesses and routes to and from nearby centres and public transport hubs, and rebalancing design in favour of pedestrians and cyclists to the site through features such as pavement width, separated routes, landscaping, lighting and other measures.'	Wording to be added to give greater flexibility to determine safest access on to the site in accordance with TfL rep.
HLP_SA49_01	49 – SITE AT FAGGS ROAD	Key Proposal	332	The site at Faggs Road will be extended to provide additional industrial business space and units to support the borough's future employment needs. <u>The western area of the site which was previously designated part of the Metropolitan Green Belt has been released for employment development and is no longer part of the Green Belt, as shown in</u>	Wording to be added after the first sentence of the key proposal section for clarification. To provide clarity that part of the proposed site allocation is located within the Metropolitan Green Belt and will be released from the Green Belt so

				Appendix 2 (Land Proposed to be Released from the Green Belt to Meet Development Needs) of the Hounslow Local Plan 2020-2041 and on the Hounslow Local Plan 2020-2041 Policies Map.	that the allocation falls entirely outside of the Green Belt designation. As per representation from the Mayor of London.
HLP_SA50_01	50 – TESCO DUKES GREEN AVENUE	First paragraph of Site Requirements section	334	Development should apply the agent of change principle in relation to adjacent industrial land, including proposals for site ref 57 – Land at Hatton fields the Airport Business Park to ensure the development does not prejudice uses proposed on these sites, and should ensure it protects the continued operation of the office and law court uses to the south of Dukes Green Avenue.	Correction.
HLP_SA57_01	57 – LAND AT HATTON FIELDS	Illustrative diagram for Land at Hatton Fields	342	Amend Illustrative diagram for Land at Hatton Fields to include new Public Safety Zone boundary	Correction and clarification.
HLP_SA57_02	57 – LAND AT HATTON FIELDS	Illustrative diagram for Land at Hatton Fields	342	<i>Amend Illustrative diagram for Land at Hatton Fields to include parcel of land between Faggs Road and eastern site boundary within site redline</i>	Correction and clarification.
HLP_SA57_03	57 – LAND AT HATTON FIELDS	4 th paragraph in Planning Designations section	341	Development would need to accord with the Airport Business Park Place Land at Hatton Fields Policy P2 (c) which requires developments to be in compliance with DfT circular 01/2010 (including any subsequent updates) regarding control of development in airport public safety zones.	Correction. As per representation from SEGRO.
HLP_SA57_04	57 – LAND AT HATTON FIELDS	Site size section	341	56.4 Ha 55.3 Ha	For correction and clarification purposes.

HLP_SA57_05	57 – LAND AT HATTON FIELDS	5 th paragraph in Planning Designations section	341	Part of the site (19.3 <u>17.25</u> hectares) is proposed to be released from the Green Belt to be developed for industrial use, with some of the area to be released being retained for the continued use of National Air Traffic Services.	For correction clarification purposes.
HLP_SA64_01	64 – MOD Feltham	Movement and Access section	353	'The layout should support the creation of legible streets, which follow the Healthy Streets approach, minimise the impacts of traffic generation on the surrounding streets, do not provide through routes across the site <u>for vehicles (apart from buses)</u> , and enhance wayfinding and the overall character of the urban form and which will allow the future extension of bus routes into the site.'	To add clarity as per representation from TfL.
HLP_SA65_01	65 – LEISURE WEST	Minimum Development Quantum Table	355	Add "leisure" to the minimum development quantum for site 65 – Leisure West that currently states "Health/Community (Sqm)", so it reads: " <u>Leisure/</u> Health/Community (Sqm)"	Correction and clarification.
HLP_SA67_01	67 – UPS HOUSE	Site Requirements	358	<u>The site is home to non-designated industrial uses and as such, London Plan (2021) Policy E7 (Industrial intensification, co-location and substitution) Part C should be followed.</u>	For clarification, to include reference to Part C of Policy E7 of the London Plan, in a standalone paragraph as the final sentence of the site requirements section. As per representation from the Mayor of London.
HLP_SA72_01	72 ST. CATHERINE'S HOUSE AND CAR PARK	"Site requirements" section	364	Development should protect <u>conserve</u> and enhance the spire and its setting and provide a high quality design which is equivalent to the tower's importance at the end of key views in Feltham	For correction – to remove the term 'protect' from allocation wording and replace this with conserve, in line with the NPPF and London Plan. As per Historic England's representation.

HLP_SA74_01	74 – HOUNSLOW WEST STATION	Site Requirement Section		And appropriate level of short term car parking provision to serve the station and the local centre.	To delete text from the Site Requirements section in line with representation from TfL.
HLP_SA84_01	84 – HOUNSLOW CAVALRY BARRACKS	“Key proposal” section	384	Hounslow Cavalry Barracks will be redeveloped to provide a new residential area which protects conserves and enhances the historic buildings, and introduces a range of new uses to the site to support new homes.	For correction – to remove the term ‘protect’ from allocation wording and replace this with conserve, in line with the NPPF and London Plan. As per Historic England’s representation.
HLP_SA87_01	87 – EURO HOUSE	Site Requirements	388	The site is bounded by Prince Regent Road and the Kingsley Academy site opposite to the north, residential dwellings on Prince Regent Road and Cecil Road to the north-east, a mixed use residential and commercial block on High Street to the east, and Hounslow High Street to the south and Laurence Road to the west.	For correction.
HLP_SA90_01	90 – INWOOD BUSINESS PARK	Site Requirements	394	<u>The site is home to non-designated industrial uses and as such, London Plan (2021) Policy E7 (Industrial intensification, co-location and substitution) Part C should be followed.</u>	For clarification, to include reference to Part C of Policy E7 of the London Plan, in a standalone paragraph as the final sentence of the site requirements section. As per representation from the Mayor of London.
HLP_SA91_01	91- HOUNSLOW BUS GARAGE	Site requirements	395	<u>The operation of the bus garage and bus station should not be compromised by the position of, design and layout of the residential dwellings and amenity spaces. The agent of change principle will need to be applied to ensure that the rest of the development provides appropriate mitigation to address any impacts arising from the 24/7 operational needs of the bus garage and bus station.</u>	For clarification, text added to site requirements to make it clear that the operation of the bus garage and bus station must not be compromised by the site allocation as per the representation received from TfL.

HLP_SA92_01	92 – UPSTAGE	Site Requirements	398	<u>The site is home to non-designated industrial uses and as such, London Plan (2021) Policy E7 (Industrial intensification, co-location and substitution) Part C should be followed.</u>	For clarification, to include reference to Part C of Policy E7 of the London Plan, in a standalone paragraph as the final sentence of the site requirements section. As per representation from the Mayor of London.
HLP_SA92_02	92 - UPSTAGE	Site requirements	398	<u>For any development proposals that come forward, TfL and the bus operator should be involved in early discussions to identify alternative provision for the bus servicing facility to help provide the same level of service in line with Policy T3 of the London Plan and the Sustainable Transport, Walking and Cycling LPG</u>	Text to be added to the Movement and Access statement to ensure bus operator is involved in discussions for alternative provision as per the representation received from TfL.
HLP_SA97_01	97 - 30 RUGBY ROAD	Site Requirements	406	<u>The site is home to non-designated industrial uses and as such, London Plan (2021) Policy E7 (Industrial intensification, co-location and substitution) Part C should be followed.</u>	For clarification, to include reference to Part C of Policy E7 of the London Plan, in a standalone paragraph as the final sentence of the site requirements section. As per representation from the Mayor of London.
HLP_SA98_01	98 – OSTERLEY STATION CAR PARK	“Heritage Considerations” section	408	Any development should <u>conserve</u> protect and enhance the existing listed station building and its setting through a high-quality design which <u>conserves</u> protects views of the station tower.	For correction – to remove the term ‘protect’ from allocation wording and replace this with conserve, in line with the NPPF and London Plan. As per Historic England’s representation.
HLP_SA98_02	98 – OSTERLEY STATION CAR PARK	“Site requirements” section	408	Any development should protect and enhance the existing listed station building and its setting through a high-quality design which protects views of the station tower.	For correction – to remove duplicated text.

HLP_SA98_03	98 – OSTERLEY STATION CAR PARK	Movement and Access	408	Disabled <u>persons</u> ' car parking <u>and</u> parking for the station users should be retained	For clarification as per representation received from TfL.
HLP_SA100_01	100 – OSTERLEY PARK HOTEL	Movement and Access	412	Movement and Access Section is to be updated to include: <u>Appropriately designed vehicular access to the site is to be provided.</u> From Wood Lane and/or the A4 Great West Road'	For clarification to Movement and Access section as per TfL representation.
HLP_SA101_01	101 – THE BRENTFORD GROUP PRACTICE	Site Name and address	413	Rename allocation 101 from The Brentford Group Practice to ' <u>The Brentford Health Centre</u> ', as a correction. Rename the site address as follows: The Brentford Group Practice <u>Health Centre</u> , Boston Manor Road, TW8 8DS	Correction. As per representation from NHS Property Services.
HLP_SA102_01	102 Victory Business Centre	Movement and Access	416	Following text to be added to Movement and Access section. <u>Development is to conform to the maximum parking standards in the London Plan while maximising access by walking, cycling and public transport.</u>	For clarification to Movement and Access section as per TfL representation.
HLP_SA103_01	103 – WEST MIDDLESEX HOSPITAL	Existing Site map and Site Oblique	417	Amend site allocation redline boundary to include an additional strip of land south of O Block Therapy Centre, east of 32-37 White Lodge Close, and north of Mill Plat. Redline boundary also separated to exclude road. As shown in proposed mapping modification HLP_PM_13.	Minor correction to site allocation boundary. As per representation from the Chelsea and Westminster NHS Trust.
HLP_SA103_02	103 – WEST MIDDLESEX HOSPITAL	Movement and Access	417	The site is a functioning hospital with large amounts of parking and access routes on site, these the <u>hospital</u> uses must be supported and enhanced	Minor correction for clarity as per representation from TfL.
HLP_SA113_01	113 - 69 TO 77 BOSTON MANOR ROAD	"Site requirements" section	430	Redevelopment of site to introduce residential uses alongside protection <u>conservation</u> and enhancement of Listed Buildings for business use or further education use.	For correction – to remove the term 'protection' from allocation wording and replace this with conservation, in line with the NPPF

					and London Plan. As per Historic England's representation.
HLP_SA117_0 1	117 – THE TREATY CENTRE	“Site requirements” section	439	Creative, decorative lighting and focal points of urban art and similar will protect conserve and enhance the character of the town centre where appropriate.	For correction – to remove the term ‘protect’ from allocation wording and replace this with conserve, in line with the NPPF and London Plan. As per Historic England's representation.
HLP_SA118_0 1	118 – FORMER GSK SITE	Site requirements – second sentence of paragraph 3	442	Given the scale of the site, proposals should aim to conform to the highest standard of sustainability, with assessments of both operational and embodied carbon undertaken prior to commencement.	To reflect the position in the London. As per representation from Brentside Developments Ltd.
HLP_SA118_0 2	118 – FORMER GSK SITE	Site requirements – second sentence of paragraph 4	442	Site is designated as a Key Existing Office Location. Development which results in the loss of offices should normally accord with Local Plan Policy ED2 or any subsequent policy, however, given the immediate challenges for the office market that are acknowledged in the Employment Land Review update evidence, marketing evidence will be considered for departing from the requirement not to lose any employment floorspace in this locality.	For clarification that the 2-year marketing requirement that applies to sites in Key Existing Office Location designations is not waived in the case of allocation site ref 118. In response to representation from Brentside Developments Ltd.
HLP_SA121_0 1	121 – LAND SOUTH OF BEDFONT ROAD	Site requirements – paragraph 3	448	Having regard to the costs of required ground works needed to prepare the site for the development of Travelling Showpeople plots, it is considered this would necessitate the need for an enabling development on the surrounding Greenham Triangle site in the area to the south of this allocation site, north of the railway line and east west of Bedfont Road, to ensure the viable delivery of the Travelling Showpeople plots allocated.	For correction. A modification is required to correct one of the cardinal directions referred to in the Site Allocation. The third paragraph of the “site Requirements” section of the allocation should state ‘west of Bedfont Road’ rather than east of Bedfont Road. As per

					representation from Chrisfys Properties Ltd.
HLP_SA121_02	121 – LAND SOUTH OF BEDFONT ROAD	Site requirements – paragraph 3	448	The enabling development should be for a demonstrated need that is suitable to be delivered at the site, which may include a B8 industrial Storage and Distribution use. The enabling development would need to <u>be in compliance with paragraphs 153-156 of the NPPF (December 2024 version)</u> demonstrate Very Special Circumstances exist to justify the development within the Green Belt, outside of this allocation boundary inset.	For clarification. A modification will be presented as set out in Appendix A, to amend the last sentence in the site requirements section of the proposed allocation by removing reference to the need for the enabling development to demonstrate Very Special Circumstances specifically, and instead state that the enabling development would need to be in compliance with paragraphs 153-156 of the NPPF (December 2024 version). As per representation from Chrisfys Properties Ltd.
HLP_SA121_03	121 – LAND SOUTH OF BEDFONT ROAD	Site size section in allocation table	447	Amend site size from 0.8 hectares to <u>0.7</u> hectares	Correction. As per representation from Chrisfys Properties Ltd.
HLP_SA123_01	123 - 1-83 HIGH STREET	Movement and Access	452	“Development should <u>seek to limit car parking on the site to the minimum necessary and any pre-provided parking should be clearly justified as public parking to serve the town centre as a whole.</u> maintain an appropriate level of car parking to serve the town centre based on current levels of use of all town centre car parks and expected levels of demand.	To further clarify the councils stance in regards to car parking especially in relation to Retail use in this location, as per the representation received from TfL.

				Residential development is to be car free except for provision of disabled <u>persons</u> parking and <u>necessary operational parking</u> .	
HLP_SA1-123_01	The following Site Allocation refs: 1,2,3,4,5,6,7, 8,9,10,11,13, 14,16,17,18, 19,21,22,23, 25,26,27,28, 29,30,32,33, 34,35,36,37, 51,52,59,62, 63,64,65,67, 69,70,72,74, 77,80,81,82, 83,84,90,96, 98,99,100 101,102,103, 105,106,107, 110,111,113, 114,115,116, 117,118,122, 123	“Heritage Constraints ” section	258-452	Development is required to conserve/ preserve , and/or seek opportunities to enhance the historic environment where potential impacts upon heritage have been identified.	For correction – to remove the term ‘preserve’ from allocation wording and retain conserve and enhance in line with the NPPF and London Plan, as per Historic England’s representation.
HLP_SA51-72_01	The following Site Allocation refs:	“Site source”, “movement and access”,	335-364	Change references to ‘Feltham Masterplan (2017)’ to ‘Feltham Masterplan (2017) <u>or any subsequent update</u> ’	For clarification and to ensure the ongoing accuracy of the Plan.

	51, 52, 55, 59, 61, 62, 63, 64, 65, 67, 69, 72	and/or "site requiremen ts" sections			
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APPENDIX 2 – LAND PROPOSED TO BE RELEASED FROM THE GREEN BELT TO MEET DEVELOPMENT NEEDS

Modification code <i>e.g. [HLP_A2_01]</i>	Map /Site	Page	Modification	Reason for modification
<i>HLP_A2_01</i>	Ron Smith Recycling and Land at Green Lane GB release		Update site polygon to reflect area that is to be released from GB. Specifically, removing the ‘spur’ in the NW corner of the site which is not currently designated as GB but is included as release. Update the hectarage to reflect new GB release area. Area change from 6.76Ha to 6.65Ha	To correct a factual mapping error.
<i>HLP_A2_02</i>	Land South of Western International Market		Update GB release polygon to reflect the correct site allocation, removing the area of warehousing in the north-west corner of the site. Update the hectarage to reflect new GB release area. Area change from 12.78Ha to 12.25Ha	To accurately reflect the correct site allocation boundary
<i>HLP_A2_03</i>	Overall map		Apply updated GB release polygons to overall map. Update GB release area figure to reflect changes in polygons. Area change from 44.81Ha to 44.17Ha	To reflect the changes made to individual GB release polygons

