

Hearing Statement

Hounslow Local Plan Examination

Matter 4: Employment

Document EX48b - Affordable Workspace

Prepared on behalf of Robert Wiseman & Sons Limited

April 2026

Hearing Statement, Matter 2

1 Introduction

- 1.1 This Statement has been prepared on behalf of Robert Wiseman & Sons Limited in respect of Hounslow Local Plan, which has been submitted to the Secretary of State for Examination.
- 1.2 This document provides additional commentary on Examination Document EX48b that relates to Affordable Workspace.
- 1.3 This document has been prepared on behalf of the London Borough of Hounslow to respond to issues raised during the Stage 1 Hearings.

Hearing Statement, Matter 2

2. Commentary on Document EX48b - Affordable Workspace Payment In Lieu Methodology & Spatial Need Assessment Interpretation of Viability Results

- 2.1 It is noted in section 1.5 of document EX48b, that there several parties engaged in the Examination have raised concerns about the approach to considering viability for the proposed affordable workspace policy.
- 2.2 These concerns have been raised as a result of the information presented in the viability testing. The tables presented illustrate that when the affordable workspace policy is applied to development proposals for the general employment market (i.e. those that only include operations across use classes B2 and B8), this result in an adverse impact on viability.
- 2.3. Despite the results of the viability testing, no changes are proposed to the approach to securing affordable workspace and no amendments are proposed to the draft policy approach.
- 2.4 Paragraph 1.5.3 of document EX48b provides some context to explain why it is considered that general employment development will continue to be viable with the application of the affordable workspace policy.
- 2.5 However, no updated viability testing has been undertaken to demonstrate that, even when applying contextual considerations, general employment sites will indeed be viable.
- 2.6 The evidence base to support the Local Plan is therefore not sufficiently robust, as no testing has been provided to demonstrate that such development will indeed be viable.
- 2.7 Whilst the Planning Authority may seek to rely on the preparation of viability assessments to support applications for new development, however this is not in accordance with Planning Practice Guidance.
- 2.8 Guidance relating to Viability is clear in noting that viability testing should be undertaken robustly at plan making stage and should not relay on the provision of viability assessments at decision making stage (*Planning Practice Guidance: Viability - Paragraph: 002 Reference ID: 10-002-20251216*).
- 2.9 As there is a lack of clear and robust evidence to demonstrate that development to meet general employment needs across B2 and B8 operations has been undertaken, then the draft Plan should not be considered to be sound.