



Examination of the Hounslow Local Plan

Historic England, Hearing Statement

Stage 1 Post Hearing Notes

April 2026

Historic England is the principal Government adviser on the historic environment, advising it on planning and listed building consent applications, appeals and other matters generally affecting the historic environment. Historic England is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice.

The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft Local Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development.

Historic England Hearing Statement

1 Introduction

1.1. This Hearing Statement summarises Historic England's response to the Council's [Tall Building and Heritage Note](#) (EX56) and [Post Stage 1 Schedule of Modifications](#) (EX57) and provides an update on our position on Matter 8 as previously set out in our [Statement of Common Ground \(EX5h\)](#) and [Hearing Statement](#), dated December 2025 (WS8.2).

Notes

2 Policy CC3: Tall Buildings**Response:**

- 1.2. We are broadly content with the changes to Policy CC3 many of which have been discussed with the Council since the Stage 1 hearings. Other proposed modifications have previously been agreed between Historic England and the Council through the SoCG to **Clauses A, B, C, D, F, O (VII)** as set out in EX56. We have reviewed EX56 and EX57 and have the following comments:
- 1.3. We have some concerns about the proposed removal of clauses where they are considered to duplicate those in the London Plan. This is because of the current uncertainty about whether London Plan Policy D9 will be carried forward into the new plan and in what form.
- 1.4. **Clause L / Figure CC3.4:** We suggest that the Figure CC3.4 and new part L are excluded in favour of robust cross referencing to the Policies Map and to the more detailed analysis contained in the Local Plan evidence base. This evidence forms the basis for the 'suitable locations' that will be identified in figure CC3.3. While in theory a constraints map would provide an additional layer of protection, we question how helpful this would be. This is firstly because many of these matters are constraints to all forms of development and would be best included on the Policies Map rather than specifically in relation to tall buildings. Secondly, as it is not possible to map the settings of heritage assets, or equally to layer on the many heritage assets that exist, it could have the effect of directing developer interest to sensitive locations. We welcome, however, reference to heritage assets and their settings in the title, which partly addresses our concern.
- 1.5. **Clause M:** Metropolitan scale tall buildings should not be promoted in the plan unless this is justified by the evidence base. It is unclear whether the evidence base identified potential for buildings this tall in Hounslow.
- 1.6. **Clause Q:** While in theory Part O provides an additional layer of protection for heritage in cases where contextually tall buildings are proposed, this is a lengthy sub clause and we are uncertain of the interaction with other policies for tall buildings and design. We are also uncertain of how likely it is that buildings of three or five times the context height would *not* be considered a tall building. However, provided it is clear how policies would interact we have no objection to its inclusion.
- 1.7. **Table CC3.2:** We support the inclusion of a reference to site specific assessment of impacts within the table's title. This has gone some way to address our previous comments. However, to ensure that the relationship between information presented in this table and the evidence base is clear, we consider the title needs to be amended to: "***Potentially appropriate heights for each location, subject to detailed, site specific assessment of impacts:***"

Notes

3 Policy CC4: Heritage

- 1.8. We note and support the inclusion within (EX56) of many of the proposed modifications agreed between the Council and Historic England through the Statement of Common Ground to **Clauses B, F, L, O, Q, R**.
- 1.9. The Council is proposing to supersede modifications previously agreed in the SoCG with Historic England. In relation to **Clauses K, M, S**, as set out in EX56, (EX57 ref: *EIP_C6_64, EIP_C6_65, EIP_C6_67, superseding HLP_C6_39, HLP_C6_41, HLP_C6_45*) we confirm we support these as they improve consistency with national policy. EX57 should be updated so it is clear HLP_C6_45 is superseded by EIP_C6_67.
- 1.10. In relation to **Clause N**, while the Council has not incorporated the proposed modification agreed within the SoCG (ref: HE39) into the Schedule of Modifications (EX57), we accept this as in combination with the changes to Clause K it better aligns with national policy regarding less than substantial harm.
- 1.11. We note Clause H is proposed to be retained in Policy CC4. Our view remains that this would sit better in Policy CC1 as per our SoCG.