



**London Borough  
of Hounslow**

**LB Hounslow Site Allocations (Vol.2),  
West of Borough (Vol.3) and Great  
West Corridor (Vol.4) Local Plan  
Reviews**

**Regulation 22 Consultation  
Statement**

December 2020

## Contents

1. Introduction.....	2
2. Timeline for adoption.....	5
3. Summary of Consultation Process and Main Issues.....	9
4. Regulation 18 Issues Consultation.....	15
5. Regulation 18 Preferred Options Consultation.....	35
6. Regulation 19 Pre-Submission Consultation.....	73

Appendix A: Regulation 18 Issues Consultation Materials

Appendix B: Regulation 18 Preferred Options Consultation Materials

Appendix C: Regulation 18 Preferred Options Consultation Detailed Summaries

Appendix D: Regulation 19 Consultation Materials

Appendix E: 'Pre-Regulation 19' workshop summary tables

## **1. Introduction**

- 1.1 This Statement sets out how LB Hounslow has involved residents, statutory and non-statutory bodies and other key stakeholders in preparing the Site Allocations (Vol.2), West of Borough (Vol.3) and Great West Corridor (Vol.4) Local Plan reviews in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It sets out the means by which consultation has been carried out and how the main issues raised by stakeholders have influenced the plan making process.
- 1.2 The Statement meets the requirements set out under Regulation 22 (1)(c) of the same Act. As such it sets out:
- (i) which bodies and persons the local planning authority invited to make representations under regulation 18,
  - (ii) how those bodies and persons were invited to make representations under regulation 18,
  - (iii) a summary of the main issues raised by the representations made pursuant to regulation 18,
  - (iv) how many representations made pursuant to regulation 18 have been taken into account;
  - (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
  - (vi) if no representations were made in regulation 20, that no such representations were made.
- 1.3 The statement therefore demonstrates that LB Hounslow have fully consulted key stakeholders throughout the preparation of the Local Plan Reviews in accordance with the relevant Regulations and the adopted LB Hounslow Statement of Community Involvement (SCI)<sup>1</sup>

---

<sup>1</sup> [https://www.hounslow.gov.uk/info/20034/planning\\_policy/1547/statement\\_of\\_community\\_involvement\\_sci](https://www.hounslow.gov.uk/info/20034/planning_policy/1547/statement_of_community_involvement_sci)

## Context

- 1.4 The Hounslow Local Plan was adopted on 15th September 2015. In order to find the Plan sound, the Inspector proposed two main modifications to the submitted plan, adding 2 policies (SV1 and SV2) requiring partial plan reviews to be undertaken in order to plan positively for the strategic scale of growth in two key areas: the Great West Corridor area (now an Opportunity Area in the emerging New London Plan) and the West of Borough area (part of the Heathrow Opportunity Area shared with LB Hillingdon).
- 1.5 Following initial evidence gathering, an 'Issues' (Regulation 18) consultation was undertaken between December 2015 and February 2016. A Sustainability Appraisal (SA) scoping update was also undertaken for the plan reviews at this time and an assessment framework was agreed with statutory bodies. A second round of Regulation 18 consultation on a 'Preferred Options' version of the Great West Corridor (GWC) and West of Borough (WoB) Local Plan Reviews took place between October to December 2017. The consultations also included amendments to Hounslow's adopted (September 2015) Local Plan, however given changes to national and regional policy (i.e. the publication of the new NPPF and consultation on the draft New London Plan) these amendments were not taken forward at this time.
- 1.6 Following both rounds of Regulation 18 consultation, the main issues raised by stakeholders were reviewed and policies were amended where appropriate. Furthermore, following some comments raised at this time, the decision was taken to re-structure the plan review documents to place the site allocations into a separate volume in order to make it easier for users to navigate the emerging development plan. Pending adoption, the development plan will include the following (in addition to the London Plan and any SPD/SPGs adopted by LB Hounslow)<sup>2</sup>:
- LB Hounslow Local Plan (Volume 1) (2015) – *adopted*
  - Draft Site Allocations (Volume 2) – *pending adoption*
  - Draft West of Borough Local Plan Review (Volume 3) - *pending adoption*
  - Draft Great West Corridor Local Plan Review (Volume 4) - *pending adoption*
- 1.7 Consultation on the Regulation 19 Pre-Submission draft Local Plan reviews (Volumes 2, 3 and 4) and supporting documents, including the SA (as part the

---

<sup>2</sup> For more details please see the LDS

Integrated Impact Assessments) and HRA, took place between July and September 2019.

- 1.8 Throughout all rounds of consultation LB Hounslow consulted specific consultation and statutory bodies, local amenity and residents' groups, businesses and individual residents. A variety of consultation techniques were used in accordance with the LB Hounslow Statement of Community Involvement.
- 1.9 The LB Hounslow Spatial Planning Team wishes to thank all those who took the time to comment during the consultation. All responses received during the consultation period have been carefully considered throughout preparation of the submission version of the Local Plan reviews, together with other relevant considerations such as national and London Plan Policies and evidence base documents.

## **Structure**

- 1.10 The statement comprises the following sections:
- Section 1: Introduction
  - Section 2: Timeline for adoption of the Local Plan Reviews (in line with the LDS)
  - Section 3: Summary of the consultation process and main issues raised by stakeholders at both Regulation 18 and Regulation 19 consultation stages, as well as details of how these issues have been taken into consideration during the preparation of the Plans
  - Section 4: Appendices – the appendices provide further detail as to how each round of consultation was undertaken (appendices A, B, and D). The appendices also contain tables setting out more detailed summarised consultation responses received at Regulation 18 consultation stage and comments received during informal pre-Regulation 19 consultation events, and details how the Council has taken these into account (appendices C and E).

## 2. Timeline for Adoption

### Procedure

- 2.1 As part of Local Plan preparation process, each of the Local Plan Reviews is subject to two stages of consultation as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012: Regulation 18 consultation and Regulation 19 consultation. For the Local Plan review process, this resulted in three rounds of consultation:
- Stage 1: (Regulation 18) Issues Consultation
  - Stage 2: (Regulation 18) Draft Local Plan Review (Preferred Options) Consultation
  - Stage 3: (Regulation 19) Draft Local Plan Review (Pre-Submission) Consultation
- 2.2 Consultation activities linked to the preparation and adoption of Local Plans are covered under the following legislation and guidance:
- The Town and Country Planning (Local Planning) (England) Regulations 2012 defines the consultation procedures local planning authorities must follow when preparing a Local Plan;
  - The Localism Act 2011 sets out the legal duty to co-operate between local planning authorities and other public bodies to maximise the effectiveness of policies covering strategic matters in Local Plans;
  - Paragraph 16 of the National Planning Policy Framework (NPPF) requires that Plans should “be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees”.
  - Hounslow Statement of Community Involvement (adopted in 2013) specifies the principles of community involvement in Hounslow. With regard to Local Plan preparation, this statement explains when we will consult the community, how we will engage with them, and who we will involve in this process.

### Integrated Impact Assessment

- 2.3 The draft Local Plan reviews were also subject to detailed appraisal through the Integrated Impact Assessment (IIA) to ensure that the reviews address the principles of sustainable development. The Integrated Impact Assessment integrates the Environmental Strategic Assessment, Health Impact Assessment and Equalities Impact Assessment) into a single appraisal tool.<sup>3</sup>
- 2.4 Sustainability Appraisal (SA) is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes

---

<sup>3</sup> The statement includes commentary on the feedback received in relation to the assessment and how this has been taken on board in terms of assessing the sustainability of the Plans. For more details of the SA process please see the Submission versions of the WoB and GWC IIAs and the IIA Technical Annex.

Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive 4. It also widens the scope of the assessment from focusing on environmental issues to further consider social and economic issues. SA is a legal requirement for Local Plans. Two key procedural requirements of the SEA Directive are that:

- When deciding on 'the scope and level of detail of the information' which must be included in the SA Report there is a consultation with nationally designated authorities concerned with environmental issues; and
- A report (the 'SA Report') is published for consultation alongside the Draft Plan that presents an assessment of the Draft Plan (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

## Timeline

2.5 In line with the Town and Country (Local Planning) Regulations 2012, and other relevant regulations, the preparation of the Local Plan has proceeded through the following rounds of consultation up to the anticipated date for adoption:

Stage	Regulation	Title	Nature of stage	Period
Consultation Stage 1	Regulation 18	Issues Consultation (plus Call of Sites)	Views were sought on what the plan should contain and the issues it should address – the scoping stage.  An initial Call for Sites exercise was also held in conjunction with the Issues consultation. Call for Sites exercise which provided an opportunity for agents, landowners and developers to submit land which they believe could be developed to meet future demand for homes and jobs.	22nd December 2015 to 22nd February 2016
SA Scoping update	Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)	SA Scoping update	Given the time elapsed between the release of the SA Scoping Report for the Local Plan (adopted 2015) and the current IIA process, the London Borough of Hounslow consulted on	July - August 2016

			a Scoping Report for the Local Plan Reviews in July 2016. Consultation responses on the Scoping Report agreed that the previous SA Framework (against which the Local Plan was appraised) was an appropriate basis for the appraisal to be carried out for the IIA of the Local Plan Reviews.	
Call for Sites	Regulation 18	LB Hounslow Call for Sites (Summer 2016)	A second independent Call for Sites exercise was held in order to provide a further opportunity for agents, landowners and developers to submit land which they believe could be developed to meet future demand for homes and jobs. The Council received 59 submissions all of which were then assessed as part of the Site Assessment and Capacity Study (SAC) against detailed criteria to determine whether they represented suitable, available and achievable development opportunities.	August to October 2016
Consultation Stage 2	Regulation 18	Preferred Options Consultation	Views were sought on the draft vision, objectives and detailed wording of the preferred and alternative options policies as well as the Council's preferred list of sites. Some respondents submitted sites to be assessed through the SAC.	23 October to 10 December 2017
Consultation Stage 3	Regulation 19	Draft Pre-Submission Version (Regs19)	Consultation on the pre-submission version of the Local Plan.	30 July until 24 September 2019
Submission	Regulation 22	Draft Submission	Submission of Local Plan to Secretary of State	Winter 2020

		Version (Regs22)		
Examination	Regulation 24	N/A	Anticipated Examination in Public of the Local Plan reviews by an independent Planning Inspector	Early/Mid 2021 (subject to availability)
Adoption	Regulation 26	N/A	Anticipated adoption date for the Local Plan Reviews	Late 2021

**Table 2.1: Consultation process**

## **Consultation on Minor Amendments to the Local Plan**

- 2.6 In light of the review of the London Plan, the Council has decided not to proceed with minor amendments to the adopted Local Plan which were originally consulted upon at Regulation 18 stage (October – December 2017). The Council has set out an indicative timetable for the review of the whole Local Plan in the Local Development Scheme (LDS) which can be found on the Council’s website. Summaries of consultation responses received relating to minor amendments to the Local Plan are provided in Appendix C for reference.

### **3. Summary of Consultation Process**

#### **Consultation Participants and Responses**

- 3.1 As part of both Regulation 18 and 19 consultation stages residents, businesses, stakeholders, statutory consultees and the wider community were invited to comment on the draft Local Plan Reviews.
- 3.2 In accordance with Regulation 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012) and the Statement of Community Involvement, the Council has undertaken consultation with:
- statutory consultees who may have an interest in the subject of the plan;
  - general consultees and other consultation bodies; and
  - individuals, residents, businesses and organisations who are registered on our planning policy database who expressed an interest in being kept informed about the progress of the Local Plan and other planning policy documents.
- 3.3 Those bodies prescribed in Regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012 and section 33A(1)(c) of the PCPA 2004 as being subject to the duty to cooperate were also consulted.
- 3.4 Details of the method by which these groups and individuals were invited to make representations to the Local Plan at Regulation 18 and Regulation 19 stage are set out in sections 4, 5 and 6 below, and examples of the consultation materials used at each stage are provided in Appendices A, B and D.

#### **Duty to Cooperate**

- 3.5 Section 110 of the Localism Act inserted section 33A into the Planning and Compulsory Purchase Act 2004 ("PCPA") imposes a duty on local planning authorities and a range of "prescribed bodies" in England to engage constructively, actively and on an on-going basis with each other to maximise the effectiveness with which a range of activities, including Local Plan preparation, as far as they relate to "strategic matters". Paragraphs 24 of the National Planning Policy Framework (NPPF) states that local planning authorities are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. The NPPF is clear that effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy, and that authorities should collaborate to identify the relevant strategic matters which they need to

address in their plans (paragraph 25 and 26). Paragraph 27 of the NPPF also requires that joint working on identified strategic cross boundary matters should be demonstrated through the preparation of one or more statements of common ground (SCG).

- 3.6 In line with the duty to co-operate, the Council has met with neighbouring boroughs and other bodies to discuss relevant strategic matters and cross-boundary issues arising from the preparation of the draft Local Plan reviews and continues to engage with these parties to agree positions.
- 3.7 LB Hounslow has produced a Duty to Cooperate Compliance Statement to accompany the submission versions of the Plans which outlines how the Council has engaged with prescribed bodies, neighbouring and partnering LPAs throughout the plan making process. LB Hounslow has also entered into various SCGs with key stakeholders to demonstrate joint working on strategic matters and these will be also passed on to the Inspector to aid the examination of the Plans (please see the LBH Duty To Cooperate Compliance Statement for more details).

### **Prescribed bodies**

- 3.8 The duty to co-operate covers a number of prescribed bodies in addition to neighbouring local authorities. These are set out below:
- The Environment Agency;
  - Historic England;
  - Natural England;
  - the Mayor of London;
  - the Civil Aviation Authority;
  - the Homes and Communities Agency (\*Greater London Authority in London);
  - each Primary Care Trust (now Clinical Commissioning Group);
  - the Office of Rail Regulation (now Office of Rail and Road);
  - Transport for London;
  - each Integrated Transport Authority (\*TfL in London);
  - each highway authority; and
  - the Marine Management Organisation
- 3.9 Further to the above, the regulations also stipulate that local planning authorities must cooperate with Local Enterprise Partnerships and Local Nature Partnerships. It should be noted that these bodies are not themselves subject to the requirements of the duty. Specifically, local planning authorities must have regard to their activities when they are preparing their local plans, so long as those activities are relevant to plan-making.

- 3.10 As part of the duty to cooperate, all relevant prescribed bodies were consulted as part of GWC and WoB Local plan review preparation.

### **Neighbouring Local Authorities**

- 3.11 In order to fulfil the duty to cooperate, LB Hounslow engaged with all local authorities which directly adjoin the borough:

- Spelthorne Borough Council
- London Borough of Hillingdon
- London Borough of Ealing
- London Borough of Hammersmith and Fulham
- London Borough of Richmond upon Thames

### **Other Strategic Partnerships**

- 3.12 Over and above our direct neighbours, members of the following strategic partnerships were consulted as part of both Regulation 18 and Regulation 19 consultation for the GWC and WoB Local plan reviews:

#### *Heathrow Spatial Planning Group (HSPG)*

- 3.13 In late 2015 the Council initiated the establishment of the Heathrow Strategic Planning Group (HSPG). The Group's objective is to build collaborative working between Heathrow Airport Limited (HAL) and all the authorities and bodies responsible for the areas most affected by the Airport. The member organisations hold a range of different views about whether or not a third runway should be built at Heathrow (and some participate in an 'observer' rather than a 'member' capacity only at present). However, all are united in the view that such collaborative work is essential to best mitigate and compensate the negative impacts and maximise the benefits of the Airport to local residents, businesses and environment.

- 3.14 The Council is a founding member of the Heathrow Strategic Planning Group (HSPG), which is made up of local authorities, Local Enterprise Partnerships and Colne Valley CIC which neighbour Heathrow Airport, and includes observers from the GLA/TfL, Government and Highways England, with Heathrow Airport Ltd an invited attendee. The Group recognises that the impact of the airport extends across administrative boundaries and that the collaborative working of Local Authorities and other bodies surrounding Heathrow Airport will result in better spatial planning and the management of impacts, together with

maximising the benefits of the airport to the local economy and community, whatever decisions are made regarding expansion of the airport in the future. Environmental, transport, spatial planning, and economic sub-groups have been established to consider these specific aspects. Essentially the Group's purpose is to fulfil duty to co-operate responsibilities in relation to planning across the area with Heathrow expansion as a focus, to shape and respond to Heathrow's Development Consent Order application for a third runway proposal, and produce a planning framework for the area to shape the DCO.

3.15 HSPG members are set out below:

- London Borough of Hounslow
- Heathrow Airport Limited
- London Borough of Ealing
- Royal Borough of Windsor and Maidenhead
- Runneymede Borough Council
- South Bucks District Council
- Spelthorne Borough Council
- Slough Borough Council
- Buckinghamshire County Council
- Surrey County Council
- Buckingham Thames Valley Local Enterprise Partnership (LEP)
- Enterprise M3 (LEP)
- Thames Valley Berkshire (LEP)
- Greater London Authority (observer)
- Old Oak Common and Park Royal Development Corporation (observer)
- Transport for London (observer)
- DCLG/ BEIS (Cities and Local Growth Unit) (observer)
- Department for Transport (observer)

3.16 At the time of writing, the future of the HEP is in doubt following the ruling handed down by the Court of Appeal on 27<sup>th</sup> February 2020 in relation to the legality of the ANPS in respect of its compliance with the UK Government's climate change commitments and the Paris Agreement on Climate Change (2016). On 31st March 2020 the HSPG released a Position Statement outlining the group's intention to publish the finalised JSPF (February 2020) and accompanying SCG. The statement also explains that HSPG members will continue with the next phase of the group's work when the situation with regards to the Court of Appeal decision and the economic impacts of COVID-19 are better known.

*West London Alliance (WLA)*

3.17 The WLA is a sub-regional partnership between seven West London local authorities - the London Boroughs of Barnet, Brent, Ealing, Hammersmith & Fulham, Harrow, Hillingdon and Hounslow – and the Old Oak and Park Royal Mayoral Development Corporation. The partnership is committed to an enduring programme of collaboration and innovation to improve outcomes for West London, covering a remit which includes: increasing economic growth, employment and skills; improving health and wellbeing; delivering increased housing supply; and delivering innovation in joint working.

3.18 It is backed by the West London Economic Prosperity Board, which is a formal joint committee of all the West London boroughs other than LB Hillingdon. This provides a formal, democratically accountable basis for the WLA's work on growth, including planning matters; it has also published a West London Vision for Growth, setting out the sub-region's priorities to ensure it remains a thriving and prosperous part of a dynamic, growing world city fit for purpose into the 2040s.

3.19 The WLA provides a forum for joint work by West London planning authorities to ensure the planning system supports the sub-region's sustainable growth. In particular:

- It convenes regular meetings of senior officers responsible for growth (economic development and planning), chief planning officers and planning policy officers at which strategic planning matters are discussed and common approaches agreed
- It has supported preparation of a range of joint evidence base studies to help inform and support emerging planning policy, including local plan reviews. Evidence base documents published to date are the:

- West London Strategic Flood Risk Assessment
- West London Strategic Housing Market Assessment (October 2018)
- West London Gypsy and Traveller Accommodation Needs Assessment (October 2018)
- West London Strategic Housing Land Availability Assessment: Small Sites (November 2018)
- An Employment Land Assessment, focussing particularly on industrial and logistics (May 2019)

The following are in preparation:

- WLA Affordable Workspace Study
- The WLA is in the course of commissioning a sub-regional Strategic Infrastructure Delivery Plan to identify priorities for physical, digital, blue, green

and social infrastructure to support sustainable growth 2020-2035. It is considering a future programme of work that may include a strategic approach to availability of land for housing and employment, barriers to housing delivery, town centres and use of the planning system to secure training and employment opportunities.

## 4. Regulation 18 Issues Consultation

### Consultation methods

4.1 A range of methods were used to engage the public in consultation on the Local Plan Reviews Issues Consultation. These measures were based on those set out in the Statement of Community Involvement (SCI). The SCI identifies a number of bodies that need to be consulted. These include specific consultation bodies (comprising various statutory authorities) and general consultation bodies. The general bodies include a large number of organisations with an interest in planning, including business and residents' groups, amenity groups, civic groups, cultural organisations, places of worship and voluntary organisations.

4.2 Hounslow Council maintains a consultation database of individuals and organisations interested in planning policies. This includes those who have previously responded to consultations on other planning documents, as well as the specific and general consultation bodies. Over 859 emails and letters were sent to consultees advising them on how to comment. They explained where the consultation documents were available and encouraged recipients to comment. Documents were made available and the consultation publicised via the council website, local libraries and at community area forum meetings.

4.3 Two questionnaires were provided to aid consultation, one for the GWC Plan review and one for the WoB Plan review. Examples of these questionnaires can be found in appendix A.

a) Website: Hounslow Council's website contained extensive information on the consultation. The Issues documents and questionnaires were made available for viewing and download. It was also explained where printed versions of these documents could be obtained.

b) Libraries: During the consultation period the Local Plan Issues version was made available for viewing at the council Civic Centre offices and all public libraries. Instructions were sent to library staff to ensure they were able to support residents to view the documents and provide comments. A table of libraries is provided below:

Beavers Library	Cranford Library	Heston Library	Osterley Library
Brentford Library	Feltham Library	Hounslow Library	
Chiswick Library	Hanworth Library	Isleworth Library	

c) Events and meetings: Officers from Spatial Planning attended the following Area Forum meetings to introduce the Local Plan Reviews and provide information on the consultation that was being undertaken. Officers presented

the GWC document to Chiswick and Isleworth and Brentford and the WoB document to Heston & Cranford and Bedfont, Feltham and Hanworth. The council received interest group meeting requests and obliged, including meeting resident community group the Brentford Community Council on the 11th January 2016 at the Griffin pub in Brentford. Officers also presented the West of Borough to Central Hounslow area forum although only a small part of the study area is likely to be within the jurisdiction of this forum. The officers outlined the process for the Local Plan Reviews including research being written and the key issues identified for the areas and how to comment. The table below sets out the Area Forum events:

<b>Area Forum</b>	<b>Date</b>	<b>Place</b>	<b>Time</b>
Central Hounslow	28th January 2016	Hounslow Jamia Masjid and Islamic Centre	7:30 pm
Chiswick	19th January 2016	Chiswick Town Hall	7.30pm
Heston and Cranford	21st January 2016	Civic Centre	7pm
Central Hounslow	28th January 2016	Hounslow Jamia Masjid and Islamic Centre	7:30 pm
Chiswick	19th January 2016	Chiswick Town Hall	7.30pm

- 4.4 Copies of the comments and notes of the public meetings are available on the Council's web site under Area Forums
- 4.5 Copies of all consultation materials, including promotional materials and the questionnaires used for the consultation, are appended to this report (Appendix A).

*Call for Sites*

- 4.6 The Council has undertaken a Call for Sites exercise which provided an opportunity for agents, landowners and developers to submit land which they believe could be developed to meet future demand for homes and jobs. This will inform the preparation of the Hounslow Local Plan Review and help to ensure that there is sufficient land available within our area to meet anticipated development needs.
- 4.7 An initial Call for Sites exercise was undertaken as part of the Issues consultation. A further Call for Sites exercise ran for eight weeks from Friday the 12th of August to Friday the 7th of October 2016. The planning policy consultation database was contacted and explanatory text added to the Council's Planning Policy webpages to promote the exercise. The Council received 59 submissions all of which will be assessed against detailed criteria to determine if they represent suitable, available and achievable development opportunities. The

Council is now assessing all of the sites to enable the most appropriate sites to be selected for inclusion as Site allocations in the Local Plan Review.

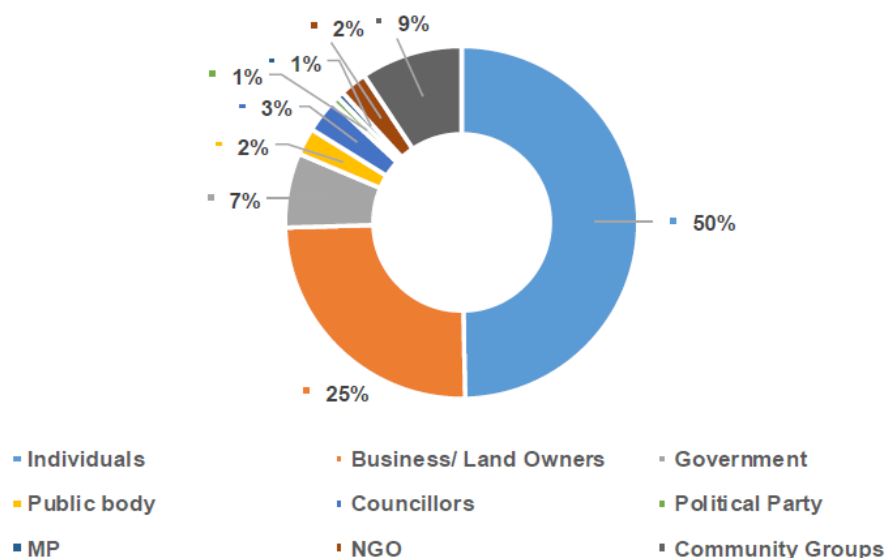
### *Sustainability Appraisal*

- 4.8 A separate SA was produced for the Local Plan which was adopted on the 15th September 2015 following a public examination. To support the GWC and WoB Local Plan Reviews a Sustainability Appraisal Scoping Report was published July 2016 followed by a five-week consultation with key statutory bodies in the UK. The scoping report forms the first stage of the Sustainability Appraisal (SA) by providing updates of relevant plan policies and programmes, updating the baseline context for Hounslow and identifies key sustainability issues to be addressed in the SA. The main purpose of the SA is to ensure that a plan or policy will have been effectively appraised for its sustainability impact.

### **Summary of main issues**

- 4.9 This section contains a summary of the main issues raised in representations received at the Regulation 18 Issues consultation stage of the Local Plan Reviews.
- 4.10 The Regulation 18 consultation (stage 1) generated formal written responses from 161 individuals or organisations; 89 for the GWC and 82 for the WoB. These generated 2462 individual responses to the questions posed in the questionnaires for both plan reviews: 1219 responses to the GWC consultation and 1243 responses to the WoB consultation. These comments were received by email and letter.
- 4.11 The following chart breaks down the diversity of consultees who provided representation:

### Breakdown of Consultation Representations



*Breakdown of Issues consultation representations*

4.12 As part of duty to co-operate the council consulted around twenty seven government organisations, local councils and public bodies of which 11 provided representations across the two local plan areas, which included:

- Sport England
- Transport for London
- Natural England
- London Borough of Richmond upon Thames
- Runnymede Borough Council
- Spelthorne Borough Council
- London Borough of Hillingdon
- Mayor of London
- Environment Agency
- Historic England
- Surrey CC

4.13 Summary tables setting out the main issues raised by respondents to the Regulation 18 Issues and Options consultation are provided below, along with the Council's response to the comments received. Detailed summaries of the Regulation 18 (Issues) consultation responses and the Council's responses to issues raised are included in Appendix B

**Table 3.1: Summary of responses to the Regulation 18 (Issues) GWC Local Plan review:**

<b>Study Area and Strategic Vision</b>	
<b>Summary of Main Issues</b>	<b>LBH Response / Action</b>
There was broad consensus among respondents that the extent of the GWC boundary need to be more clearly defined and not extend east of Chiswick roundabout/Power Road or west of Syon Lane.	The Plan Area has been more clearly defined and adjusted so that it does not extend beyond Syon Lane in the west or Chiswick roundabout/Power Road in the east.
A number of respondents want to see the removal Brentford Town Centre from the GWC plan area.	Brentford Town Centre has been excluded from the Plan Area.
The opportunity area named 'Kew Gate' was seen by the majority as an inaccurate representation of the area, 'Brentford East' has been suggested.	The name of the east of the Plan Area has been changed to Brentford East/Great West Corridor East.
<b>Economic Development</b>	
<b>Summary of Main Issues</b>	<b>LBH Response / Action</b>
Respondents were broadly in favour of supporting the digital and media sector in GWC as a catalyst for employment growth, but many felt that this sector should not be prioritised over others. There were concerns over the overreliance on one specific sector or employer and the risks that this	The Council will seek to provide a mix of employment spaces that are attractive for the entire business community in existing and potential growth sectors. It will cater for larger companies, small and medium sized enterprises, microbusinesses, as well as the large freelance workforce by working with developers and stakeholders to deliver a sustainable and robust local economy that promotes Great West Corridor as a place for enterprise and innovation.
There was general consensus that maintaining a diverse range of employment sectors in the corridor would create a more resilient and adaptable local economy, which would safeguard employment opportunities for local residents.	Policy GWC1 safeguards the functioning, attractiveness and competitiveness of the Strategic Industrial Location (SIL) and Locally Significant Industrial Site (LSIS) in the Great West Corridor and its ability to support employment and economic functions by ensuring <ul style="list-style-type: none"> <li>I. that there is an increase, or at least maintain, employment densities;</li> <li>II. retain and/or provide small business units;</li> <li>III. minimise and mitigate against any significant adverse impacts that development may have on surrounding land uses;</li> </ul>
Respondents called for a wide range of sectors be supported, including industrial uses, and companies of varying size, including SMEs.	Policy GWC1 supports businesses of all sizes, in particular start-ups, small and medium- sized enterprises particularly in the east of the corridor. The Council will work with affordable

	and shared workspace managers and providers to bring forward affordable and shared workspace as part of development proposals (Policy GWC1).
<b>Transport</b>	
<b>Summary of Main Issues</b>	<b>LBH Response / Action</b>
There was broad support for the proposed new rail stations and connections, but concerns over when these would be delivered.	The GWC Local Plan (Policy GWC5) will support the delivery of major rail infrastructure, including Brentford - Southall Crossrail Link and Golden Mile Station and the Old Oak Common - Hounslow Overground Link and Lionel Road Station. The delivery of these projects is closely linked to the designation of the GWC as an opportunity area and is dependent on funding from new development.
Respondents provided their views on how to improve access to and from the area, of which the most common suggestions were: improved bus routes and frequency, including to Brentford Town Centre, and provide priority bus routes along the Great West Road, better cycle and pedestrian access, and improved access to existing rail stations.	The Council's goal is to create a stronger more connected area with greater physical integration between the corridor, the surrounding residential neighbourhoods, and supporting business services. The Council will work with stakeholders to enhance transportation infrastructure to provide a safer walking and cycling environment, ease congestion, and enhance public transportation networks. Policy GWC5 supports the expansion of reliable public transportation options for getting to and from the area including increased bus services along the corridor. The Council will work with TfL to deliver enhanced bus service along the A4 to provide improved transportation to employment sites along the Corridor. Policy GWC5 will improve cycling infrastructure throughout the area, specifically along the A315 (Cycle Superhighway 9) and Quietway networks to promote safe streets and healthy communities. The Council will work with TfL to increase pedestrian safety along the A4 corridor by improving pedestrian crossings, especially at key intersections that provide access across the A4.
Respondents felt that the main barriers to movement in the area were poor public transport provision, lack of cycle infrastructure, the A4 creating poor pedestrian environment and acting as a barrier, and the general traffic congestion on the A4, Chiswick High Road and South Circular, which is perpetuated by large proportion employment trips being made by car.	The Council recognises that public transport accessibility into the area is poor and reliant on limited bus services, with the exception of Brentford town centre, Chiswick centre, and Brentford East. Walking and cycling networks are poorly connected, car dominated and street legibility is restricted especially along the A4/Great West Road, under the M4, and along the A315. Infrastructure barriers, such as the M4

	and A4 corridors, the South Circular Roads, rail lines, and large scale self-contained commercial development create segregation and restrict movement within and through the area. Existing infrastructure networks such as strategic road networks and rail services are nearing capacity which could impede development and growth if improvements are not made to secure sustainable transport and enhance connectivity. Air quality and noise pollution from traffic reduces the enjoyment and use of the corridor, especially along the M4/A4 route.
<b>Housing</b>	
<b>Summary of Main Issues</b>	<b>LBH Response / Action</b>
Opinions among respondents were divided as to whether the GWC area could help meet demand for housing in the borough. Some favoured the building of homes along the corridor in order to provide homes for those working locally and reduce commuting. Others questioned the suitability of the area for new homes due to concerns over air quality and noise pollution and argued that development should be non-residential only.	Evidence suggests that the Great West Corridor could contribute further to the borough's housing supply – but only provided it is supported by game changing transport infrastructure. The designation of the GWC as an Opportunity Area would help secure funding to support this new transport infrastructure.
Some respondents believed the Corridor should be considered as a last resort and that housing was only acceptable if design did not involve tall tower blocks, and incorporated mixed use development for housing and employment uses. On the mixture of residential and employment uses, most respondents welcomed a mix of uses, as long as it did not include heavy industry, and as long as businesses were located along the busy roads and homes away from them.	The Council believes that the GWC has the capacity to provide a minimum of 4,800 new homes over the plan period, but that this relies on the delivery of proposed transport and social infrastructure. The demand for housing in Hounslow has been assessed by the Hounslow Housing Market Assessment (HHMA, 2016). Hounslow's total Objectively Assessed Need (OAN) has been assessed as being 1,898 dwellings per annum (dpa) or 37,960 dwellings over the plan period 2015-2035. The OAN for the Great West Corridor has been assessed as to be 147 dpa.
There were a range of opinions on the types of homes which should be provided, including apartment blocks, smaller-scale mixed housing, family homes, and a mixture of owner-occupied and social housing. There was a broad agreement on the need for more affordable housing.	The Council recognises the need for family homes. The HHMA 2016 identifies that the greatest demand is predicted for 2 and 3 bedroom dwellings across both market and affordable housing. The supply of housing in Hounslow and across London has not been satisfying need. The London Strategic Housing Land Availability Assessment (SHLAA) (2014) identified strategic housing land availability across London. For the period 2015 to 2025 the potential for housing supply in Hounslow has been demonstrated as being 8,222 dwellings. This figure translates into a minimum housing

	supply target of 822 dpa up to 2025 (The London Plan – March 2015). The Council will continue to pursue a strategic affordable housing target of 40% through private development as well as Council-led initiatives. Negotiations on the mix and tenure will be conducted with planning and housing officers and will be subject to viability and other requirements in accordance with Local Plan Policy.
<b>Environment</b>	
<b>Summary of Main Issues</b>	<b>LBH Response / Action</b>
Respondents felt that the main environmental issues in the GWC were the proximity to Heathrow, poor air quality, noise pollution, lack of street trees, poor maintenance, quality of access to parks and the Thames.	Policy GWC4 will seek to mitigate against air and noise pollution by requiring the design and position buildings to minimise exposure to elevated levels of pollution by locating sensitive uses away from existing or planned sources of air and noise pollution, unless appropriate mitigation is provided to reduce such pollution to acceptable levels. Less sensitive non-residential uses should be sited adjacent to the Great West Road/M4, acting as a physical buffer between the road and more sensitive uses.
There was broad agreement among respondents that policies to encourage a modal shift away from cars were needed, including better public transport provision and an improved public realm with better landscaping and more trees.	Policy GWC4 will provide safe, direct and attractive pedestrian and cycle routes that connect open spaces, rivers and canals with neighbourhoods and workplaces to enhance opportunities for recreation and a healthy lifestyle.
There was broad agreement that green spaces and waterways needed to be protected and improved, including better access. Many respondents raised concerns over the impact of new development and tall buildings on the open spaces in or near the GWC plan area.	Policy GWC4 will improve the overall greenness of the area, through the planting of mature or semi-mature trees along all streets, integrating planting as part of SuDS systems, creating living roofs and walls which will help soften the harsh environment, mitigate air and noise pollution, and enhance the image of the corridor.
<b>Urban Design and Heritage</b>	
<b>Summary of Main Issues</b>	<b>LBH Response / Action</b>
Respondents expressed concern over the impact of tall buildings in the GWC and their impact on historic context and specific heritage buildings.	The Council has undertaken careful analysis of the appropriate heights of new development in the GWC and the impact of tall buildings on the surrounding area. The Council has taken the opposition against tall buildings into careful consideration. Consequently, the Council permitted heights have been significantly reduced to limit the visual impact of development in the GWC.

<p>The general consensus was that policy guidance needed to promote and protect the existing buildings of historic significance along the GWR, by encouraging proposal that will include the maintenance and reuse of existing historic buildings and can add high quality architectural design that preserves the character of the area.</p>	<p>Policy GWC3 will protect and, where possible enhance, strategic and local views from Conservation Areas, Registered Parks and Gardens and the World Heritage site (Figure). Development proposals are expected to not have any significant impact and should reinforce the significance of these views where possible, especially views from and impact on surrounding heritage assets such as Gunnersbury Park, Kew Gardens World Heritage Ste, Strand on the Green Conservation Area, Kew Green Conservation Area, Wellesley Road Conservation Area, the River Thames Corridor, and listed buildings, such as the Campanile of the Water and Steam Museum.</p>
<p><b>Community Infrastructure</b></p>	
<p><b>Summary of Main Issues</b></p>	<p><b>LBH Response / Action</b></p>
<p>Respondents suggested that in order to support growth in employment and housing a number of measures would be needed, including: improved and new public transport links before new development; provide a range of community facilities such as schools, medical centres, dentists, nursery places, and sports facilities.</p>	<p>Local Plan Policy CI1 promotes new community facilities in areas of growth and where identified in the Council’s Infrastructure Delivery Plan. New housing to support the viability of local facilities and uses and bring investment in community infrastructure and the public realm.</p>
<p>Respondents were also asked to suggest locations for new schools the most common included: Commerce Road Bus Garage; Phase 3 Griffin Park; existing business parks and brownfield sites.</p>	<p>The emerging IDP update will be used by the Council, along with its partners and stakeholders, to guide development and ensure that appropriate infrastructure and funding is secured to support growth. Areas included within the IDP include physical infrastructure, social infrastructure, and green and blue infrastructure. The goal of the IDP is to outline infrastructure that is necessary to support the growth of the Borough, deliverable within the Plan period, and complimentary to the vision set out by the GWC Local Plan Review. The IDP will:</p> <ul style="list-style-type: none"> <li>o Provide a baseline capacity measurement of current physical, social, and green and blue infrastructure throughout the Borough;</li> <li>o Analyse the future predicted capacity needed to support growth throughout the Borough;</li> <li>o Estimate funding requirements needed to provide future infrastructure;</li> <li>o Prioritize infrastructure delivery; and</li> <li>o Ensure the feasibility of development sites within the Local Plan based on infrastructure projections.</li> </ul>

<b>Making it happen</b>	
<b>Summary of Main Issues</b>	<b>LBH Response / Action</b>
<p>Commenting on what should change about specific site allocations, respondents made a number of suggestions, including:</p> <ul style="list-style-type: none"> <li>o Limiting development development at East of Chiswick roundabout to 5-6 stories.</li> <li>o Site 9 (Gunnersbury Park) is not suitable for housing due to impact of M4.</li> <li>o Site 26 is more appropriate for housing only than for mixed-use development.</li> <li>o Greater flexibility on the terms of uses for the Gillette site (site 7).</li> <li>o Too many sites being earmarked for mixed use and suggested that more should be reserved for employment.</li> </ul>	<p>The proposed development at Chiswick roundabout has been refused planning permission, partly due objections to its height. As part of this Local Plan Review, height restrictions will be proposed for the Great West Corridor.</p> <p>Any housing development at Gunnersbury Park would be sheltered from the M4 by offices. Site 26 has been excluded from the Local Plan Review area following consultation (please see comments above).</p> <p>Gillette Corner (site 7) is a unique grade II listed Art Deco building. Policy P1 (Great West Corridor West) supports the conversion of the Gillette building into a creative hub for smaller businesses and freelance workers in the digital, media and broadcasting industry.</p> <p>The Council has put in place a number of measures to protect employment sites and ensure that employment space is not lost through development in the Great West Corridor. This includes an Article 4 Direction which limits office-to-residential conversions (coming into force in January 2018) and Strategic Industrial Designations covering key employment sites in the GWC.</p>
<p>Respondents were asked which sites they would like to see added to the site allocations responses included (most of which were also submitted as part of call for sites exercise)</p> <ul style="list-style-type: none"> <li>o The West Cross Industrial Estate - mix use;</li> <li>o B&amp;Q at Chiswick roundabout - residential;</li> <li>o Osterley Park Hotel – mix use or residential;</li> <li>o 4 and 8 Harlequin Ave - mixed use;</li> <li>o 27 Great West Road - mixed use;</li> <li>o The Kew Bridge Distribution Centre – mixed use.</li> </ul>	<p>The Council will assess all sites proposed as part of the site allocation process.</p>
<p>Commenting on what additional planning 'tools' would help implement the plan, in particular transport proposals, respondents made the following suggestions:</p> <ul style="list-style-type: none"> <li>o TfL and other authorities will need to continue to review the impact of schemes individually and cumulatively, include the impact from emerging Local Plans and masterplans in neighbouring local authorities. TfL will expect to see contributions</li> </ul>	<p>The Council will undertake a Transport Impact Assessment to assess the impact of development schemes individually and cumulatively. The Council will be please to continue to work with TfL, GLA and other stakeholders on assessing transport infrastructure need and delivery. Investment in transport infrastructure will come from a range of sources, including from new development. The designation of the GWC as an</p>

<p>secured to implement the range of strategic and local transport interventions.</p> <ul style="list-style-type: none"> <li>o There were questions around the funding of infrastructure and to what degree the necessary transport improvements could be funded through development.</li> </ul>	<p>Opportunity Area will help to unlock further funding streams, including from the GLA.</p>
<p>Respondents made the following additional suggestions:</p> <ul style="list-style-type: none"> <li>o Request for policies that seek to protect, enhance and provide for sports facilities.</li> <li>o More details on proposed changes to the bus network were requested, particularly in relation to the new rail infrastructure.</li> <li>o The designation of the GWC as an Opportunity Area was questioned, on the basis that Opportunity Areas tend to be able to accommodate at least 5,000 jobs and 2,500 homes.</li> </ul>	<p>It is a Council Corporate Priority to promote active, healthy communities, and 'promoting lifestyles that improve people's wellbeing and quality of life with less need for health and social care. Supporting people taking an active part in community life and reducing loneliness and social isolation.' The Local Plan Review includes a number of policies to encourage healthy lifestyles, including Policies GWC 4 and 5 to 'Provide safe, direct and attractive pedestrian and cycle routes that connect open spaces, rivers and canals with neighbourhoods and workplaces to enhance opportunities for recreation and a healthy lifestyle', and Policy T1 'Improving cycling infrastructure throughout the area, specifically along the A315 (Cycle Superhighway 9) and quietway networks to promote safe streets and healthy communities.'</p> <p>The Council will produce an Infrastructure Delivery Plan which will assess transport needs to support forthcoming development .</p> <p>The Council is preparing a Infrastructure Delivery Plan (IDP) to support the provision of key infrastructure set out in the Local Plan. The IDP is used by the Council, along with its partners and stakeholders, to guide development and ensure that appropriate infrastructure and funding is secured to support growth. Areas included within the IDP include physical infrastructure, social infrastructure, and green and blue infrastructure. The goal of the IDP is to outline infrastructure that is necessary to support the growth of the Borough, deliverable within the Plan period, and complimentary to the vision set out by the Local Plan and West of Borough (WoB) and Great West Corridor (GWC) Local Plan Reviews.</p>

**Table 3.2: Summary of responses to the Regulation 18 (Issues) WoB Local Plan review:**

<b>Study Area and Extent</b>	
<b>Summary of Main Issues</b>	<b>LBH Response / Action</b>
There was general consensus among respondents that the extent of the WoB boundary is acceptable.	Support welcomed.
A number of respondents suggested that the proposed re-designation of green areas would undermine access to green spaces to local residents.	The inclusion of green areas and conservation areas does not suggest that these areas would be unacceptably affected. The purpose of the Local Plan Review is to ensure a strategic approach to development including the protection and enhancement of green areas and heritage assets. As regards to green spaces, new developments are currently assessed against Local Plan Policy GB1 which aims to protect Green Belt and Metropolitan Open Land by ensuring that any development is not inappropriate and meets the purposes of the Green Belt and Metropolitan Open Land. The Council however recognises that some of the existing Green Belt land no longer serves green belt purposes and is currently undertaking a review to establish whether this is the case.
Others expressed their concern that the general pro-growth vision for the WoB Plan would harm local heritage sites.	Any development affecting local heritage will be assessed against Local Plan Policy CC4 and West of Borough Policy WoB 3, which will take opportunities to conserve any heritage asset and also will ensure that new developments do not harm buildings of architectural or historic interest.
Respondents also emphasised the importance of full engagement between London Borough of Hounslow and adjoining local authorities in creating a joint vision for Heathrow Opportunity Area.	The Council has commitment to joint working with the Greater London Authority, neighbouring authorities including the London Borough of Hillingdon and other stakeholders to progress the Heathrow Opportunity Area identified in the London Plan.
<b>Strategic Vision</b>	
<b>Summary of Main Issues</b>	<b>LBH Response / Action</b>
Residents were generally supportive of the aspirational vision and clear commitment to growth. There was emphasis put on the fact that the vision needs to address each town individually and this would be best done by liaising directly with local residents associations and community groups to establish the needs of each town. Several residents highlighted the importance of protecting the distinctiveness and the character of individual	The Council recognises the distinctiveness of town centres and wider areas in the West of Borough and will thus ensure that the development proposals respond well to their unique character. The Council has taken the consultations responses into account and developed a set of place-specific policies for the followings areas, which will help to ensure that any development promotes the local

<p>towns in the West of Borough.</p>	<p>distinctiveness and the character of these places.:</p> <ul style="list-style-type: none"> <li>o Feltham;</li> <li>o Bedfont Lakes;</li> <li>o Heathrow Gateway;</li> <li>o Airport Business Park; and</li> <li>o Cranford and Heston.</li> </ul>
<p>There was general consensus that the Council should be more proactive in tackling economic and health inequalities in the borough as well as improving connectivity between individual towns in the WoB</p>	<p>The Council recognises the health inequality in the WoB as a major challenge and has taken this issue forward as one of the major policy areas in the draft WoB Local Plan Review. The Plan includes a wide range of policies in particular policy WoB 6 which seeks to improve health outcomes and encourage healthier lifestyles, measures to reduce the impact from noise and air pollution, and improve access to green spaces for recreational use. We recognise that there is limited access to public transport and significant levels of road congestion in the area. These issues will be addressed by:</p> <ul style="list-style-type: none"> <li>- supporting the proposal for Southern Rail Access to Heathrow Airport with a new station in proximity to Bedfont Lakes Business Park;</li> <li>- increasing the frequency of buses between towns, neighbourhoods, centres of employment and existing transport hubs;</li> <li>- improving access to Feltham Station;</li> </ul> <p>These investments will improve sustainable connectivity and enhance access to the West of Borough and Heathrow airport, and further will help in reducing road congestion.</p>
<p><b>Green Belt</b></p>	
<p><b>Summary of Main Issues</b></p>	<p><b>LBH Response / Action</b></p>
<p>There is general support for maintaining the current Green Belt boundaries. Residents emphasised that the Council should enhance the current Green Belt land by improving maintenance and access. Numerous residents suggested that any Green Belt land should only be re-designated if it leads to a material improvement in the natural environment and its accessibility for local residents. Other respondents identified affordable housing, health care and education as the preferred developments, if any Green Belt land is released.</p>	<p>The Council is currently undertaking a Green Belt Review, which it will consult on as part of the wider West of Borough Local Plan Review consultation. The National Planning Policy Framework requires that the function of the Green Belt is reviewed as part of the Local Plan Review process. The most recent comprehensive review of the Green Belt in Hounslow as undertaken in 1991. Development over time within and adjacent to green belt land has meant the openness and functions of parts of the green belt have been eroded. Some land currently protected as green belt no longer serves green belt purposes, however, much of it still requires protection from inappropriate development and such the open space designation needs to be changed to Metropolitan Open Land.</p>

<p>A number of respondents called for preserving the environmental values of River Crane Corridor and Bedfont Lakes Country Park.</p>	<p>WoB Plan Policy P1 (Feltham) will require development in the neighbourhood of River Crane corridor to contribute to a high-quality open space at Upper Crane Park with a well-managed nature reserve and de-culvert. Therefore, the Council's view is that the proposed changes will have a positive impact on the setting of River Crane. As regards to Bedfont Lakes Country Park, there are three sites which has classified as not meeting the Green Belt purposes by the recent Review. Nevertheless, the Council recognises the environmental value of these sites, and therefore any residential development on these sites would be required to compliment these sensitivities.</p>
<p>Respondents were concerned that no information about the Green Belt Review has been published and that there is a lack of clarity what extent of Green Belt is proposed to be released for development.</p>	<p>The Green Belt review is available to the public on the Council's website. The WoB Plan will make it clear which Green Belt land will be released for development.</p>
<p>Respondents suggested that if any Green Belt land is released, it should be compensated for by designating other areas as Green Belt. However, at the same time the re-designated Green Belt land should not be reduced significantly in terms of quantum and quality, and re-provided in well-accessible locations that would be fit for purpose.</p>	<p>The Council is reviewing its Green Belt designations against the purposes set out in the NPPF. It will recommend sites for retention as Green Belt, sites for re-designation as Metropolitan Open Land or Local Open Space, and could propose a limited number of sites for development. Enhancement will be sought for the retained Green Belt land and newly designated Metropolitan Open Land to ensure the beneficial uses of green belt are realised through increasing public accessibility and opportunities for sports and recreation, enhancing landscapes, visual amenity and biodiversity and improving derelict or damaged land. In addition, new open spaces will be provided within new developments and existing open spaces will be improved to ensure they are best serving the needs of their communities. A limited amount (8-9%) of Green Belt is recommended to be de-designated and allocated for development to help to ensure there is sufficient land available to meet the borough's challenging housing, employment and infrastructure requirements. In accordance with policy WoB 4, the Council will expect development proposals to maintain the openness, setting and visual amenity of Green Belt and Metropolitan Open Land where development is located adjacent to, in place of, or affecting the setting of the Green Belt and Metropolitan Open Land, with special regard to the location, setting, design, materials, height</p>

	and massing, boundary treatment and landscaping.
<b>Employment and Heathrow</b>	
<b>Summary of Main Issues</b>	<b>LBH Response / Action</b>
Respondents emphasised the need to create sustainable employment for local people rather than for those from outside the borough. Numerous responses suggested that there is a need to identify additional sites for industrial and office uses, due to the planned airport expansion. These sites should take opportunities of existing and planner transport links.	The WoB Plan sets a target to create 150,000m <sup>2</sup> of industrial space and 180,000m <sup>2</sup> of commercial uses. The Council will achieve this by the intensification of existing employment sites and provision of new Locally Significant Industrial Sites (LSIS) for employment activities particularly in Hatton Cross (Airport Business Park) and Cranford.
There was general support for creating training and apprenticeship opportunities for youth residents.	Local Plan Policy ED4 helps to encourage the borough's businesses to employ local residents by providing training opportunities to local residents.
Respondents felt that new hotels should be located both at or very near the Heathrow Airport and in town centres. Several residents emphasised that terminal-linked hotels are poorly represented at Heathrow and should be prioritised.	Heathrow Airport itself lies outside the boundary of Hounslow and the Council is therefore unable to comment on airport's terminal-linked hotels. The WoB policy P3 (Heathrow Gateway) proposes Hotel uses adjacent to airport but within Hounslow borough boundary.
On employment opportunities, some residents suggested that these need to support the skills and aspirations of existing local residents, whilst others emphasised the need for more high-tech jobs, which would be less polluting.	West of Borough Plan Policy WoB 2 will ensure that developments provide a range of workspaces and unit sizes, to support a wide range of businesses. Policy WoB2 will also help to ensure that employment space is protected.
<b>Transport, including Southern Rail Access</b>	
<b>Summary of Main Issues</b>	<b>LBH Response / Action</b>
Responses are generally favourable to the proposed Southern Rail Access to Heathrow as this investment will help to ease road congestion and air pollution. At the same time, respondents suggested that the new railway should complement the existing environment and infrastructure. Several respondents called for more comprehensive examination of the proposed route and locations of stations.	The Council is working with a number of stakeholders, including Network Rail, Department for Transport and Heathrow, to evaluate different route options and station locations for Southern Rail Access to Heathrow. The Council's preferred option is for a station at Clockhouse roundabout.
There was general consensus that the Council should promote cycle infrastructure and pedestrians over cars.	One of the key transport issues identified in the WoB Plan is the limited access to cycling infrastructure. The Council is committed to undertake more work on implementing the Cycle Superhighways, Quietways, and improve existing cycle networks. Given the projected development growth, the Council will secure additional funding through S106 Agreements

	and CIL payments, which will directed to funding these projects. Walkability is another major issue as it is currently significantly restricted by railway lines, water ways, developments and roads. Policy WoB 5 will expect developments to incorporate safe pedestrian access in site design. Further, the Council will work on facilitating the development of the Mayor of London and TFL funded shared-use Greenways route along the Longford River, to provide a link between Hanworth Park and Feltham Town Centre.
Respondent suggested increasing the frequency of local buses in peak times.	The Council will be working with the community and strategic partners such TfL and developers to improve overall connectivity in the Area, including bus connections.
<b>Noise and Pollution</b>	
<b>Summary of Main Issues</b>	<b>LBH Response / Action</b>
There was general consensus among respondents that the proposed Airport expansion will not bring any environmental benefits to the area. A number of respondents suggested promoting sound proofing measures in the construction of new dwellings and upgrading of existing housing stock.	The Councils recognises that the expansion of Heathrow Airport on its own will not bring improvements to air quality and noise pollution. On the other hand, the third runway, albeit of its benefits to local economy, will bring £700m into the Heathrow's noise insulation scheme. The cumulative impact of this investment and quieter aircraft and runway alternation will help in reducing the number of people affected by aircraft noise.
Residents suggested that environmental improvements such as landscaping and planting can assist in reducing noise and air pollution levels	West of Borough Policy WoB 6 will expects that developments Incorporate planting, trees, open spaces and soft surfaces wherever possible in order to secure a variety of spaces for residents, visitors or employees to use and observe. This will also help in combating air and noise pollution.
Respondents felt that the Council should be promoting use of low emission or electric cars.	The Council's role in promoting the use of electric cars is by ensuring that developments incorporate suitable measures that encourage residents to use such vehicles. Local Plan Policy EC2 requires that developments provide electric vehicle charging points, in line with London Plan.
<b>Housing</b>	
<b>Summary of Main Issues</b>	<b>LBH Response / Action</b>
Opinions among respondents were divided as to whether the WoB area should allocate additional sites for housing or increase the density of existing. Those who favoured additional housing suggested that it should be supported with additional transport, education, and community infrastructure, and that the current infrastructure would struggle to cope with the additional demand. Respondents	There is a requirement for additional housing land to be identified in the Borough in order to respond to the growing population of the Borough and meet housing targets set by the GLA. Hounslow Housing Market Assessment identified a need for 1898 dwelling per annum until 2035, whilst the London Plan requires at least 9000 new dwellings to be delivered in

<p>suggested that new housing should be built upon first on brownfield sites. There were a range of opinions on the types of homes which should be provided, including townhouses, apartment blocks, family homes, and a mixture of owner-occupied and social housing.</p>	<p>Heathrow Opportunity Area. These targets and the needs of growing population can only be met through the re-designation of new sites and intensification of existing sites. Part of the purpose of the Local Plan Review is to identify the additional infrastructure needs required to support existing and new homes. Policy WoB 3 will ensure that new houses are of appropriate height, scale and massing to respond well the character of the area.</p>
<p>There was a broad agreement on the need for more affordable housing.</p>	<p>The Council will be working on a strategic affordable housing target of 40% through private development as well as Council-led initiatives. Negotiations on the mix and tenure will be conducted with planning and housing officers and will be subject to viability in accordance with Local Plan Policy.</p>
<p>There are concerns the Feltham Masterplan may not deliver real benefits to local residents and the local community.</p>	<p>Feltham Masterplan aims to create a vibrant town centre with a strong sense of place, which will benefit from good access to employment space and be well-connected with neighbourhoods. There will be improvements to the public realm, widening of pavements, transforming Feltham Green into an attractive heart of the town centre and improving the connection with the Leisure West complex to better integrate it with the town centre. The vision will also unlock investment into the local community and improvements to the transport infrastructure.</p>
<p><b>Natural environment and open space</b></p>	
<p><b>Summary of Main Issues</b></p>	<p><b>LBH Response / Action</b></p>
<p>Many respondents suggested that the WoB benefits from quantity rather than quality of green spaces. There was broad agreement that the existing green spaces should be more accessible and better maintained. Respondents called for avoiding allocating industrial uses around close to green spaces. Numerous respondents believe that regardless of the needs for jobs and housing, there should be adequate availability of good quality green spaces. The right balance should be explored by undertaking comprehensive research, which would investigate the needs of the existing and future population.</p>	<p>A key priority area in the WoB Local Plan is to improve the natural environment and open spaces. In line with proposed changes to national policy the Council is expecting that funds from the sale or development of green belt land is invested back into green belt or metropolitan open land enhancement projects in the West of Borough. This will ensure local residents and their communities benefit from the impact of development on the selected development sites. The expected growth in the West of Borough is expected to see thousands more people call it home. These new residents, as well as those already living here, will require social infrastructure such as parks and open spaces to support them. Due to high land values and costs associated with maintaining parks the trend for local authorities is towards</p>

	enhancement on the spaces we have and the provision of additional ones where appropriate in large scale developments.
Respondents suggested that green spaces should incorporate more playgrounds, leisure and recreational public spaces.	A masterplan for Feltham Parks has been produced by the Council to enhance the existing open spaces and make the best use of them for the existing and additional residents expected to use them. Currently, 11,500 people live within a 12 minute walk of the parks with a possible additional 3,000 as a result of housing developments planned in the area. The playing pitches strategy suggested the designation of the Feltham parks as a community sports hub. The Local Plan will support the provision of this sports hub for the use of the whole community.
<b>Feltham and neighbourhood centres</b>	
<b>Summary of Main Issues</b>	<b>LBH Response / Action</b>
The general consensus amongst respondents was that Feltham is a disjointed town centre and that future development would need to create a better sense of community. Respondents consider that Feltham is a local community hub, which should focus on providing more leisure opportunities to residents and attracting small local businesses.	WoB Policy P1 (Feltham) will aim to create a well-connected, safe, and attractive network of cycle and walking routes linking the town centre and Feltham station with surrounding neighbourhoods. The Council will be working on reducing the dominance of road traffic by increasing the capacity of public transport infrastructure and providing better integrated public transport to encourage people to walk and cycle.
There was general consensus among respondents that small local centres and isolated local shops should be protected. Respondents suggested that the lack of demand is often caused by inadequate provision of car parking or unavailability of safe cycling routes.	Local Plan Policy TC5 aims to protect isolated local shops, particularly where they are located in areas more than 400m/5 minutes walking distance of a town or neighbourhood centre, or alternative local shopping provision. The Policy goes on to state that the Council will protect the retail and community functions of neighbourhood centres to meet the key day-to-day needs of local residents, by ensuring that at least 50% of units are in A1 use and avoiding the overconcentration of non-retail uses.
<b>Community Infrastructure</b>	
<b>Summary of Main Issues</b>	<b>LBH Response / Action</b>
There were a range of opinions as to what is considered to be community infrastructure. The most common answers include community halls, a sense of safety, opportunities to engage local communities in planning for the region, accessible	Local Plan Policy CI1 promotes new community facilities in areas of growth and where identified in the Council's Infrastructure Delivery Plan. The IDP is used by the Council, along with its partners and stakeholders, to guide

<p>medical services and vibrant town centres.</p>	<p>development and ensure that appropriate infrastructure and funding is secured to support growth. Areas included within the IDP include physical infrastructure, social infrastructure, and green and blue infrastructure. The goal of the IDP is to outline infrastructure that is necessary to support the growth of the Borough, deliverable within the Plan period, and complimentary to the vision set out by the WoB Local Plan Review. The IDP will:</p> <ul style="list-style-type: none"> <li>o Provide a baseline capacity measurement of current physical, social, and green and blue infrastructure throughout the Borough;</li> <li>o Analyse the future predicted capacity needed to support growth throughout the Borough;</li> <li>o Estimate funding requirements needed to provide future infrastructure;</li> <li>o Prioritize infrastructure delivery; and</li> <li>o Ensure the feasibility of development sites within the Local Plan based on infrastructure projections.</li> </ul>
<p><b>Urban design</b></p>	
<p><b>Summary of Main Issues</b></p>	<p><b>LBH Response / Action</b></p>
<p>Respondents expressed a wide range of opinions on the ways in which the local character and context should be preserved. Some respondents emphasised the need for new viable uses for historic buildings and introduction of preservation orders. Others suggested that local character is best preserved through high quality design of new buildings.</p>	<p>The Council will seek to preserve and enhance areas which are of heritage value and have high quality well established coherent characters that are sensitive to change. The Council will also seek to transform those areas where opportunities exist to establish a high quality coherent urban form and character. By working with developers and partners, the Council will strive to establish a series of local places with their own strong characters and identities that build on their strengths and special features, and also distinctively display their role and function.</p>
<p>Respondents suggested that there are several heritage assets in the WoB that the Council should do more to protect. These include the Crane corridor, Bedfont Lakes, Duke of Northumberland River and the industrial heritage of Feltham.</p>	<p>Policy WoB 3, seeks to ensure that the Council promotes the reuse of vacant or underused heritage assets and settings including improvements to open spaces and the public realm associated with historic and heritage buildings, including Bedfont Green, Longford River, Feltham Green, Bridge House Pond, Hanworth Park House, and David Henry Waring in Bedfont.</p>
<p><b>Making it happen</b></p>	
<p><b>Summary of Main Issues</b></p>	<p><b>LBH Response / Action</b></p>
<p>Numerous respondents suggested that the current levels of development in the borough are excessive, and thus Council should be seeking ways to reduce development pressure. Other respondents believe</p>	<p>The Hounslow Housing Market Assessment (HHMA, 2016) forecasts the total Objectively Assessed Need (OAN) for the entire Borough is 1898 dwellings per annum over the period 2015-</p>

<p>that the vision should be supported through the preparation of background evidence to demonstrate that it meets the objectively assessed needs of the area, taking into account the national economic importance of Heathrow irrespective of the decision on the third runway.</p>	<p>2035. The OAN for the West of Borough has been assessed as being 909 dwellings per annum. This figure represents 48% of the boroughs total OAN.</p>
<p>There was general call for more public involvement in the decision-making process.</p>	<p>This consultation represents an initial 'Issues &amp; Options' stage, wherein the Council has invited the public to comment on the early plans for the West of Borough. Further consultation is taking place in autumn 2017, when the Council will seek responses on more detailed policy proposals as part of the 'Preferred Options' stage of plan preparation.</p>

## 5. Regulation 18 Preferred Options Consultation

### Consultation Methods

5.1 The Regulation 18 Preferred Options consultation ran from 23 October to 10 December 2017. The Council used a range of consultation methods to raise awareness of the draft Local Plan Reviews (Regulation 18) consultation and to engage with the public and relevant stakeholders, including the associated public consultation events, both during and before the consultation period. This is summarised below.

5.2 Regulation 18 Consultation announcements were made via a variety of media as follows:

- Hounslow Council website
- Electronic Screens around the Council Offices
- Community and Business Groups (third party) webpage
- Social Networks– Twitter, Facebook, evolve newsletter, Invest Hounslow
- Emails and letters
- Press notices/releases
- Discussion events/workshops, Drop-in events /exhibitions
- Hounslow Matters for formal consultation

#### *Emails and Letters:*

5.3 Emails and letters were sent to all consultees on the Council's planning policy database. An example of the email/letter sent is included in Appendix C. In addition, a freepost address was made available for receiving written comments and publicised in consultation documents, e-mails, posters and leaflets.

5.4 Hounslow Council also maintains a consultation database of individuals and organisations interested in planning policies. This includes those who have previously responded to consultations on other planning documents, as well as the specific and general consultation bodies. Over 925 emails and letters were sent to consultees advising them on how to comment. They explained where the consultation documents were available and encouraged recipients to comment. Documents were made available and the consultation publicised via the Council website, local libraries and at community area forum meetings.

#### *Website:*

5.5 A dedicated webpage entitled 'Local Plan reviews' was provided throughout all stages of consultation to facilitate consultation on the development of the local plan review. This webpage was advertised on the Council's planning policy and guidance webpage on the Hounslow website

5.6 This webpage advertised all consultation activities and included a link to the Council's online consultation portal ('Survey Monkey') where the public could submit comments on the Local Plan review documents. The webpage contained extensive information including an explanation of how the public could get involved, submit comments on the documents, read all evidence supporting both consultation documents and the dates of all consultation events and exhibition (link to relevant webpage on the Council's website: [https://www.hounslow.gov.uk/info/20155/december\\_2017/1769/local\\_plan\\_review\\_-\\_ends\\_sun\\_10\\_dec\\_2017](https://www.hounslow.gov.uk/info/20155/december_2017/1769/local_plan_review_-_ends_sun_10_dec_2017)).

#### *Online form*

5.7 An online questionnaire was published on the Local Plan review webpage using the 'Survey Monkey' web tool to seek feedback on the planning policies outlined in the Regulation 18 Preferred Options consultation documents (see Appendix C).

#### *Press/media coverage:*

5.8 The draft Local Plan was publicised in local newspapers and websites including the following:

- Press Release (reference PR 8830) was published on the Council's website on 17<sup>th</sup> October 2017 (See Appendix C)

#### *E-newsletters:*

5.9 The draft Local Plan reviews were featured in 'EVOLVE', an electronic newsletter that is sent out by the Council to approx.500 recipients, including Council Members, organisations in the voluntary sector and other stakeholders in Hounslow (see Appendix C).

#### *Social media*

5.10 Twitter and Facebook were used to promote consultation events: tweets were sent through the Council's twitter account @LBofHounslow announcing that the Local Plan reviews were being consulted upon, and the Local Plan Review

consultation was featured on [www.facebook.com/hounslowcouncil](http://www.facebook.com/hounslowcouncil) (See Appendix C for extracts promotional material)

*Libraries:*

5.11 Copies of the consultation documents were made available to view at all Hounslow libraries and in the main reception area of Council offices (Civic Centre, Lampton Road) during normal opening hours.

Library	Location
Beavers Library	Salisbury Road Cranford, TW4 7NW
Bedfont library	Staines Road, TW14 8DB
Brentford Library	Boston Manor Road, TW8 8DW
Chiswick Library	Dukes Avenue, W42AB
Cranford Library	Bath Road, TW5 9TL
Feltham Library	High Street, TW13 4GU
Hanworth Library	Uxbridge Road, TW13 5EG
Heston Library	New Heston Road, TW5 0LW
Hounslow Library	B7 Bath Road, TW3 3EB
Isleworth Library	Twickenham Road, TW7 7EU
Osterley Library	St Mary's Crescent, TW7 4NB

**Table 3.3: List of libraries where Local Plan review documents were made available**

## Consultation Events and Meetings

5.12 The Council held a series of public consultation events to proactively engage with residents, local organisations, businesses and the wider community. Officers from the Council attended events in order to answer questions, promote discussion and receive comments. All comments have been reviewed and have helped to shape the proposed submission of the Draft Local Plan reviews

<b>Regulation 18 Consultation</b>	<b>West of Borough Local Plan Review Drop in sessions and workshops</b> Thursday 26 October 2017 Feltham Library, The Hub Room, The Centre, Feltham, TW13 4GU
	<b>Great West Corridor Local Plan Review Drop in Sessions and Workshops</b> Wednesday 1 November 2017 129A Ridgeway Road North, Isleworth TW7 5LX

	<b>West of Borough Local Plan Review Drop in sessions and workshops</b> Monday 6 November 2017 Feltham Library, The Hub Room, The Centre, Feltham, TW13 4GU
	<b>Great West Corridor Local Plan Review Drop in Sessions and Workshops</b> Wednesday 8 November 2017 Brentford Free Church, Boston Manor Rd, Brentford TW8 8DW

**Table 3.4: List of consultation events, including date, time and location details**

*Integrated Impact Assessment*

- 5.13 The Preferred Options consultation documents were also subject to detailed appraisal through the Integrated Impact Assessment (IIA) to ensure these met the principles of sustainable development. The IIA integrates the Environmental Strategic Assessment (SA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Habitats Regulation Assessments (HRA) into a single appraisal tool. This report includes commentary on the feedback received in relation to the IIA, and how this has been taken on board (see summary of main issues table below and Appendix D).

*Consultation on Minor Amendments to the Local Plan*

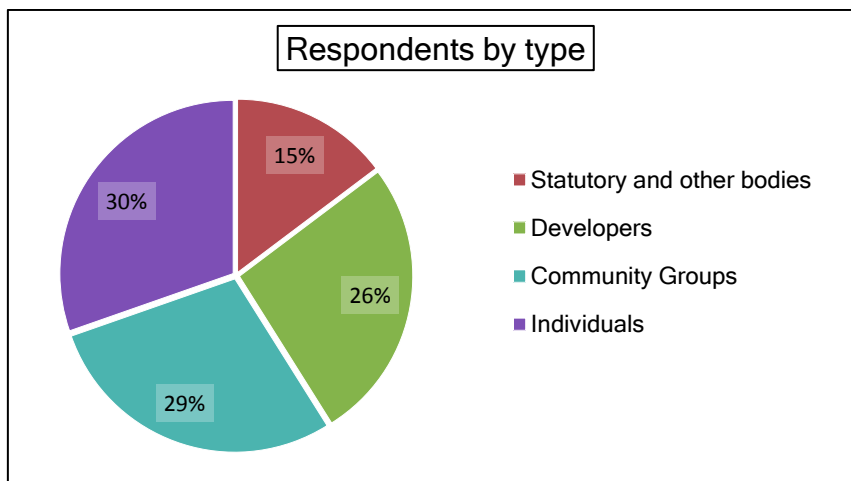
- 5.14 In light of the review of the London Plan, the Council decided not to proceed with minor amendments to the adopted Local Plan (2015) at this time. The Council has set out an indicative timetable for the review of the whole Local Plan in the Local Development Scheme (LDS) which can be found on the website. For reference, detailed summaries of consultation responses received in relation to proposed minor amendments to the Local Plan (2015) are provided in Appendix D.

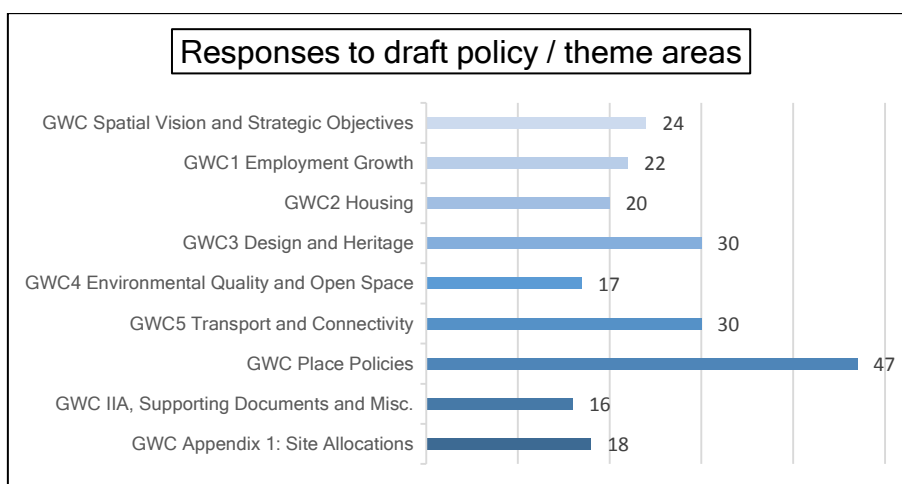
## Responses and Summary of Main Issues

- 5.15 This section contains a summary of the main issues raised in representations received at the Regulation 18 consultation Preferred Options stage of the Local Plan Reviews undertaken between October – December 2017.
- 5.16 This round of consultation generated formal written representations from 353 individuals or organisations. These responses generated 1193 responses to the content of both the GWC and WoB plans, inclusive of answers to questionnaires where these were used (see Appendix C for examples of questionnaires). In order to make it easier for the Council to respond to comments effectively, these responses were compiled by theme area to produce 692 summarised responses: 224 for the draft GWC plan and 468 for the WoB plan. These comments were received by email, letter and through the Council’s online consultation portal.
- 5.17 Response breakdowns and summary tables setting out the main issues raised by respondents, along with the Council’s response to the comments received, for both the GWC and WoB Regulation 18 Preferred Options Local Plan reviews consultation are provided below.

### Regulation 18 GWC (Preferred Options) Local Plan review

- 5.18 In total, 244 summarised responses to the Regulation 18 GWC (Preferred Options) Plan were received. The tables below break these responses down by respondent type and policy / theme area.





**Table 3.5: Summary of main issues raised in relation to the Regulation 18 GWC (Preferred Options) Local Plan review**

GWC Spatial Vision and Strategic Objectives			
Total number of responses: 24			
Summary of Main Issues	Relevant Policy Point	Respondent	LBH Response / Action
Concern over the level and type of growth set out in the preferred option vision development capacity and whether this level of development could be achieved without causing harm to heritage assets in the wider area.	<b>GWC Spatial Vision and Strategic Objectives</b>	Community groups, individuals	The draft submission version of the Plan has been prepared in line with the GWC Masterplan which sets out in detail both the location and quantum of development on various sites, as well as the approach to tall buildings and heritage impact. A heights framework has been established to inform policy.
Objection to the designation of the GWC as an Opportunity Area given the area will not be able to sustain the quantum or type of development such a designation entails	<b>GWC Spatial Vision and Strategic Objectives</b>	Community groups, individuals	The Great West Corridor has been included as an Opportunity Area (OA) in the draft New London Plan given the potential to deliver a substantial amount of new homes and jobs in the area. Opportunity Areas are set by GLA and are a key component of the Mayor's spatial strategy for London. LB Hounslow must prepare the local plan reviews in accordance with the emerging London Plan. Detailed policies have been introduced to ensure that additional growth can be accommodated whilst ensuring development represents a high quality design and mitigates any adverse impacts.
Concern raised over the	<b>GWC Spatial</b>	Community	Comment noted. The GWC plan is

potential impact of development within the GWC Opportunity Area upon the successful regeneration of Brentford Town Centre. Request that Brentford Town Centre feature more in the Plan.	<b>Vision and Strategic Objectives</b>	groups, individuals	committed to improving linkages between the Opportunity Area and Brentford Town Centre through public realm enhancements and improved connectivity. Provision of additional retail is provided as part of proposed development within the GWC area in order to service local need and is not expected to negatively affect the performance of Brentford Town Centre or impact upon its regeneration.
Further clarity sought on the relationship between the policies contained within the adopted Local Plan 2015 (Volume 1) and those within the emerging Plan reviews (Volumes 3 and 4) – specifically whether development in these areas covered will still be subject to the overarching policies in Volume 1.	<b>GWC Spatial Vision and Strategic Objectives</b>	Community groups, individuals	Further clarity has been provided in the introduction to the draft submission version of the GWC Plan. Volumes 3 and 4 are Local Plan Reviews relating specifically to the two designated opportunity areas in the borough: the GWC OA and (part of) the Heathrow OA. The Local Plan 2015 (Volume 1) will remain the main strategic planning policy document for the Borough. A matrix will be provided within the Local development Scheme setting out which policies apply in which areas.
Concern that development of housing should not undermine the functioning of designated employment areas, particularly industrial estates within SIL and LSIS. Request that LB Hounslow demonstrates how employment demand over the lifetime of the plan will be met, and how housing development will not restrict future redevelopment of employment sites.	<b>GWC Spatial Vision and Strategic Objectives</b>	Statutory bodies, developers, community groups	Comment noted and agreed. This approach has been taken forward in the draft submission version of the plan. Additional wording has been added to GWC1 Employment Growth to this effect.
Concern around focus within Spatial vision and Strategic Objectives on growth of the digital, media, broadcasting and professional sectors catering for larger companies, SMEs, microbusinesses and freelance workers rather than industrial and	<b>GWC Spatial Vision and Strategic Objectives</b>	Developers, individuals	The approach to employment articulated in the Vision and Objectives is informed by our Employment Land Review which identifies these sectors as being particularly important within the GWC area. The focus on employment is consistent with the ambitious Opportunity Area employment targets for the area as set out in the emerging London

warehousing.			Plan.
Concern over the Plan's reliance on the delivery of strategic transport infrastructure and the delivery of high density residential and commercial development before the infrastructure to support such is provided	<b>GWC Spatial Vision and Strategic Objectives</b>	Community groups, individuals	The plan has been prepared to ensure that infrastructure is delivered alongside development growth in order to deliver sustainable development. The Infrastructure Delivery Plan sets out the infrastructure required to support growth in the borough and Policy GWC7 sets out in greater detail how infrastructure will be delivered in the GWC. Housing and employment delivery has been phased in line with infrastructure delivery.
The Spatial Vision and Strategic objectives do not sufficiently cover matters relating to promoting health and wellbeing. A Strategic Objective on 'Health and Wellbeing' should be added.	<b>GWC Spatial Vision and Strategic Objectives</b>	Statutory and other bodies, community groups, individuals	Comment noted and agreed. Further emphasis has been included on health and wellbeing throughout the draft submission version of the Plan. The spatial vision and strategic objectives have been updated and new policy GWC3 Health and Wellbeing has been added. This approach has also been taken through to the three Place policies: P1, P2 and P3.
The Spatial Vision and Strategic objectives do not adequately cover the importance of existing context and character both within the GWC area and in the surrounding area, or provide adequate level of protection for designated and non-designated heritage assets	<b>GWC Spatial Vision and Strategic Objectives</b>	Historic England, community groups, individuals	The Plan has been prepared with due regard for context and character to ensure that new development both integrates, respects and enhances the area's natural environment and built heritage. Policy GWC5 requires developers to have full regard to the significance of designated and non-designated heritage assets to ensure there are no unacceptable harmful impacts.
Concern raised around the proposed level of growth set out in the Spatial Vision worsening existing health and environmental impacts relating to air quality and noise pollution, specifically through increasing congestion, increasing built form and locating sensitive uses next to strategic roads	<b>GWC Spatial Vision and Strategic Objectives</b>	Community groups, individuals	Comment noted. The Council recognises the challenge of the severely constrained availability of sites in the East of the borough to accommodate much needed housing and employment floorspace. The draft submission GWC Plan has been prepared in accordance with draft London Plan policy SI1 and aims for the area to become Air Quality Positive through implementing measures that will actively reduce air pollution within the opportunity area. New policy GWC3 seeks to ensure site

			and building design minimises exposure to elevated levels of air and noise pollution and GWC6 promotes active travel and sustainable transport to further reduce harmful emissions.
Objection to Objective 6 as this is considered to be overly prescriptive, does not represent efficient use of land and is not commercially viable. Recommend detailed design measures are adequate to mitigate noise and air pollution impacts and request that the reference to "positioning of buildings" is removed.	<b>GWC Spatial Vision and Strategic Objectives</b>	Developers	The approach taken forward is required to enable the level of housing/employment growth whilst addressing persistent air quality and noise issues along the corridor. This approach has been informed by the GWC Masterplan and is in line with emerging New London Plan Policy SI1.
<b>GWC1 Employment Growth</b>			
<b>Total number of responses: 22</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
Affordable workspace provision not suitable for all sites given scheme viability concerns and recommendations that to avoid provision stymieing development, policy should support enabling maximum densities of higher value uses (including residential) if compatible with the areas' employment function and allow for negotiation taking into account the site's development viability	<b>GWC1 Employment Growth</b>	Developers	Policy GWC1 has been redrafted to ensure that it is clear and consistent. All policies within the draft submission version of the local plan have been tested for viability, including the requirement for major development to deliver a quantum of affordable workspace.
Concern that policy approach is too inflexible to allow for employment sites to be redeveloped as mixed-use with co-location of employment and residential uses	<b>GWC1 Employment Growth</b>	Developers	Policy GWC1 has been redrafted to ensure that it is clear and consistent. The Council's position does however remain that there should be no overall reduction in employment floorspace within designated employment areas. This is consistent with emerging New London Plan policies E7 and E1.
Policy requirements for a net increase in employment floorspace on employment sites is inconsistent with adopted	<b>GWC1 Employment Growth</b>	Developers	Policy has been amended to provide additional clarity, however the Council's position remains that there should be no overall reduction in employment

Local Plan Policy ED2, which seeks to consolidate existing stock and resist loss.			floorspace within designated employment areas. This is consistent with the draft new London Plan policies E7 and E1.
Concern that employment growth would not be sustainable without the delivery of 'game-changing' transport infrastructure, in particular rail-based connectivity improvements	<b>GWC1 Employment Growth</b>	Community groups, individuals	The draft submission version of the plan has been undertaken in line with the Strategic Transport Study (STS) and proposes sufficient transport interventions to support growth and mitigate transport impacts. The Council has been working with TfL and infrastructure providers to ensure sufficient transport infrastructure is delivered.
Concern that policy approach to mix-use employment and residential development given the potential impacts of co-location on the quality of residential accommodation and amenity. Issue raised in relation to the damaging consequences of basing the location and quantity of residential development on perceived need for "enabling" other development	<b>GWC1 Employment Growth</b>	Community groups, individuals	The Council's approach to mixed-use employment and residential development is in line with London Plan policy E7 and policy GWC5 requires that schemes include good design measures to optimise land use and mitigate against potential impacts between co-location of employment and residential uses, in line with the Agent of Change principle. The Plan has been prepared to support additional capacity for employment floorspace within the GWC area
Concern that retail provision within the GWC area should be very limited to avoid any new centres competing with existing town centres (in particular Brentford Town Centre)	<b>GWC1 Employment Growth</b>	Community groups, individuals	Provision of additional retail as part of proposed development within the GWC area is included in order to service local needs and is not expected to negatively affect the performance existing Town Centre or hinder the regeneration of such.
Concern that the approach to the co-location of residential and employment uses within SIL and LSIS would undermine the overall function of these designated employment areas	<b>GWC1 Employment Growth</b>	GLA	Policy GWC1 in the draft submission version of the plan has been amended accordingly.
The policy position on no net loss of office floorspace is overly proscriptive and this should be amended so that site specific circumstances and viability considerations are	<b>GWC1 Employment Growth</b>	Developers	The Council's position remains that there should be no overall reduction in employment floorspace within designated employment areas. This is consistent with the draft new London Plan policies E7 and E1. All

acknowledged, where relevant			policies within the draft submission version of the local plan have been tested for viability.
Concern raised around the focus on supporting growth in office provision in the Plan considering existing high levels of office vacancy in the GWC area, in particular that the Employment Land Review (ELR) 2016 seems to offer contradictory findings in regards to this issue. Concern is also raised around the impacts of potential increased vacant offices on residential amenity of the area and the effect of poor economic growth forecasts	<b>GWC1 Employment Growth</b>	Community groups, individuals	The ELR 2016 is a key piece of evidence supporting the preparation of the Plan. This has assessed employment needs over the plan period based upon a robust assessment of economic trends, and has taken net loss of employment floorspace and current vacancy rates into consideration.
<b>GWC2 Housing</b>			
<b>Total number of responses: 20</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
Concerns relating to lack of genuinely affordable homes in the area and issues raised around developers reneging on commitments to provide affordable housing citing scheme viability.	<b>GWC2 Housing</b>	Community groups, individuals	The Council's most recent Strategic House Market Assessment identifies a need for 40% of housing to be delivered as affordable over the plan period. The council will seek to ensure new developments coming forward in the Great West Corridor meet the requirements of the strategic target for affordable housing. The policy approach is in line with both the approach taken by the emerging London Plan and National Planning Policy Framework, and in some cases viability assessment has indicated that ability to provide affordable housing is not viable at time of permission. However, if viability improves during the implementation and completion of the development, policy GWC2 includes a requirement for provision for a re-appraisal of viability when the scheme has been completed and largely occupied. Where viability has improved, the applicant will be expected to provide further affordable housing

			to the appropriate threshold. All policies within the draft submission version of the local plan have been tested for viability, including those relating to the provision of affordable housing.
Concern is raised over the capacity of the GWC to accommodate the scale of housing development proposed at appropriate heights and densities, together with the necessary infrastructure to support population growth	<b>GWC2 Housing</b>	Community groups, individuals	Policy GWC2 seeks to find a way to accommodate the significant housing need in the borough by securing a plan-led approach which ensures that environmental issues are identified and dealt within in the overall approach to applications coming forward on these sites. The council commissioned design-led capacity work to identify areas in the Great West Corridor which can support meeting the boroughs identified housing needs. Land of suitable size and position for residential development within the east of the borough is severely constrained, and the Plan Review seeks to find a way to accommodate housing need by securing a plan-led approach which ensure that appropriate physical, transport and social infrastructure investment is made to unlock these sites and maintain good access for existing communities along the GWC
Concern is raised around the potential for the increase in B1 office provision proposed to be converted to poor quality residential accommodation in future given permitted development rights	<b>GWC2 Housing</b>	Individuals	The loss of office accommodation has been identified as a significant threat within the Great West Corridor. The council has issued a direction (under Article 4) to restrict the permitted development right to allow conversion of offices to residential. It should be noted that Prior Approval for conversion of office to residential is restricted to properties which were used for a use falling within use class B1(a) (offices) on 29th May 2013 or before this date, so new office development would be excluded from conversion through permitted development and would therefore require full planning permission.
Concern is raised as to how the Plan envisages intensifying industrial	<b>GWC2 Housing</b>	Community groups (Brentford)	The Draft London Plan encourages the co-location of appropriate industrial uses with housing as a

estates with co-location of housing as these sites are of great importance to the area and are considered to be incompatible with residential development		Community Council)	mean to unlocking additional housing sites to meet need. The draft submission version of the Plan seeks to limit this to sites where it is appropriate, requiring sites to be intensified to deliver an increase, or at least no net loss, in employment capacity, and requires such developments to include design measures to optimise land use and mitigate against potential impacts between co-location of employment and residential uses in line with the Agent of Change principle
Policy should be amended to establish a preference for mixed use development, allowing the flexibility that where this is not appropriate due to viability or other material considerations, each proposal will be considered on its merits to allow flexibility should housing need increase and the need for employment/retail floorspace to decrease or vice versa.	<b>GWC2 Housing</b>	Developers	The policy already expects developments to be of a mixed use format, and is supported by the GWC Capacity Study which provides guidance on how this can be achieved. The plan should be read as a whole, and when taking into account the requirements set out in GWC1 is considered to provide a high level of flexibility while recognising the key aim of supporting employment and housing growth.
Objections raised to the scale of residential growth planned for given the lack of community facilities to serve the growth in population locally, especially in terms of doctor's surgeries, dentists, schools, retail and public transport provision.	<b>GWC2 Housing</b>	Individuals	Policy GWC7 of the Local Plan Review sets out how the Council will ensure the necessary supporting physical and social infrastructure will be provided as set out in the Infrastructure Delivery Plan (2019). The overall approach taken in the Places policies sets out in more detail how development will be delivered to coincide with the delivery of supporting infrastructure.
<b>GWC3 Design and Heritage</b>			
<b>Total number of responses: 30</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
The supporting evidence does not demonstrate that there has been any site-specific assessment that justifies proposed heights for taller buildings on some sites. The setting of	<b>GWC3 Design and Heritage</b>	Developers	The Council has opted for a coordinated framework based approach to the location and heights of tall buildings in the area. The Council's background work to the Local Plan for the GWC explores options for assessing proposals for

<p>maximum heights is overly proscriptive and a more flexible approach is required for tall and 'landmark' buildings</p>			<p>tall buildings. The selected option aims to strengthen the area and its character through the creation of a comprehensive and coordinated cityscape and skyline of tall buildings in identified locations with tested and identified heights. The location and heights of tall buildings have been identified through careful consideration and analysis of the impact of taller developments on adjacent heritage assets. Providing a band of acceptable heights is compliant with the Draft New London Plan and allows new development to appropriately address setting and context.</p>
<p>Plan policy does not provide adequate protections for the lower density residential streets north and south of the A4/M4 Corridor, in particular the context and character of the Victorian streets south of the A4 and north of Brentford Station (e.g. Orchard Road)</p>	<p><b>GWC3 Design and Heritage</b></p>	<p>Community groups, individuals</p>	<p>The GWC plan area includes a very limited amount of existing residential development. Nevertheless, plan policy requires any new development that comes forward to have a minimal impact on these areas. GWC5 requires that development proposals will be subject to a high quality and comprehensive design review process resulting in high quality design outcomes, and as such proposals will need to demonstrate that they have a positive relationship to the surrounding townscape context in terms of scale, streetscape and built form and have full regard to the significance of designated and non-designated heritage assets</p>
<p>The Plan does not go far enough to ensure that tall buildings do not cause harm to designated and non-designated heritage assets in the surrounding area, important views – including dynamic views – and sightlines, or to the residential amenity of existing and future residents</p>	<p><b>GWC3 Design and Heritage</b></p>	<p>Historic England, Community groups, individuals</p>	<p>Policy GWC5 seeks to provide a co-ordinated approach to tall building development, as opposed to an unmanaged and ad hoc approach, as the best way to accommodate new development whilst striving to protect adjacent heritage assets. The heights framework is based on detailed testing of heights and locations as detailed in the Great West Corridor Masterplan and appendices. The detailed views testing undertaken takes account for dynamic views. Policies in the Plan require developments to</p>

			respect adjacent heritage assets and are intended to be applied together with Policy CC4 of the existing adopted Local Plan.
The very high levels of noise and air pollution make much of the GWC area unsuitable for residential development and design mitigation outlined in policy such as sealed windows, mechanical ventilation, winter gardens and locating residential uses above a certain height will not adequately address this	<b>GWC3 Design and Heritage</b>	Community groups, individuals	The Local Plan Review recognises the challenge of the severely constrained availability of sites in the East of the borough to accommodate much needed housing and employment floorspace. New Policy GWC3 provides further detail on how sensitive non-residential uses will be used to provide a buffer between the areas of worst air and noise pollution and more sensitive residential uses. as well as a range of other design measures to minimise pollution impacts through the provision of noise and vibration insulation, winter gardens and balconies and the use of greenery to act as a buffer. Furthermore, applications will need to consider health and wellbeing during the design stages and use Best Available Techniques (BATs) to mitigate and minimise any adverse effects on health and quality of life (e.g. noise, air or light pollution, etc.). Proposals for major development schemes should also be supported by Noise Assessment, Air Quality Assessment (AQA) and Health Impact Assessment (HIA).
The Plan fails to recognise and provide adequate protection for the existing inter-war art deco buildings along the Corridor, and policy should be amended to ensure development does not harm the setting of these buildings, relates sensitively to their scale and does not interrupt views to and from them	<b>GWC3 Design and Heritage</b>	Community groups, individuals	Section 2 of the GWC document is entitled "Setting the Scene". The purpose of this section is to provide a baseline background to those features, issues and elements that currently make up the Great West Corridor plan area. It goes on to discuss some of the challenges facing the area. Whilst the comments raised regarding the setting of art deco buildings are noteworthy, these are suggestions that are in fact covered in the proposed policy GWC5 and adopted local plan policies. Policies in the Plan require developments to respect adjacent heritage assets and are intended to be applied

			together with Policy CC4 of the existing adopted Local Plan.
Plan policy fails to provide adequate control over the display of advertisement along the corridor, in particular large illuminated totem advertisements and those embedded within the built fabric of existing and proposed residential and other buildings considering the negative impacts these have upon visual and residential amenity	<b>GWC3 Design and Heritage</b>	Community groups, individuals	In determining advertisement consent applications, the Council has to behave reasonably and in accordance with Regulations, and must have due regard to appeal decisions. The Council will continue to carefully scrutinise lighting details when considering the visual amenity impacts relating to proposed advertisements.
Status of the Brentford East SPD and whether or not this has informed the approach taken forward in the GWC Local Plan Review Design and Heritage policy within the GWC Local Plan Review	<b>GWC3 Design and Heritage</b>	Community groups	The Council has decided not to take forward the SPD at this time. If and when it does decide to adopt the SPD, this will provide further guidance to GWC Plan policies.
<b>GWC4 Environmental Quality and Open Space</b>			
<b>Total number of responses: 17</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
There is no reference to reducing carbon emissions from the proposed provision of new employment spaces and homes in policy. Questions are raised as to whether all new buildings in the GWC plan will be expected to be zero carbon-emitting, designed to optimise energy performance or whether carbon off-set levies will be established.	<b>GWC4 Environmental Quality and Open Space</b>	Community groups, individuals	The Council's policies on carbon emissions are included in the current Local Plan (2015), policies EQ1 and EQ2, and will remain in force throughout the plan period. The Council has recently finalised a Carbon Offset Fund document, which details governance and allocation priorities. The Council promotes zero-carbon developments and its Carbon Offset Fund policy is consistent with the London Plan and the Mayor's Zero Carbon Homes standards.
Concern is raised in relation to the air quality impacts of both existing and future increased emissions generated by aircraft affecting residents, especially in light of Heathrow expansion	<b>GWC4 Environmental Quality and Open Space</b>	Individuals	LB Hounslow are engaging with Heathrow Airport Ltd. through the Heathrow Spatial Planning Group (HSPG) to raise issues relating to airport expansion around environmental impacts and to secure the most suitable and practical mitigation and compensation package to address any adverse impacts.
Request that developments	<b>GWC4</b>	Canal and	Further detail has been provided in

along the River Brent / Grand Union Canal contribute toward towpath and other enhancements to the blue ribbon network. Concern raised over two new Pedestrian/Cycle Bridges over the canal	<b>Environmental Quality and Open Space</b>	River Trust	new policy GWC3 Health and Wellbeing, and amendments made to Environmental policy GWC4 and GWC Place Policy P2. The bridges are an aspirational proposal to improve the connectivity of the proposed new developments within the River Brent Quarter and Brentford station. The Council will consult the relevant bodies in relation to these proposals at the earliest opportunity.
Strong objection to any development on open space in the GWC area including Gunnersbury Park, Boston Manor Park, Carville Park – and request that development fronting onto any park should be of limited height and bulk to ensure that no harm is created to the openness of these spaces or their value as heritage assets	<b>GWC4 Environmental Quality and Open Space</b>	Community groups, individuals	There are no proposals in the plan for development on designated Open Spaces found within or surrounding the GWC area. Policy GWC5 sets out detailed design policy requirements including that development be subject to a high quality and comprehensive design review process.
Concern raised in relation to the environmental impact of increased numbers of people living and working within the GWC, including air and noise pollution adversely impacting upon existing and future residents, the quality of open spaces as places of active recreation and quiet enjoyment and local ecology.	<b>GWC4 Environmental Quality and Open Space</b>	Community groups, individuals	Policy GWC3 requires developers to consider health and wellbeing during the design stages and use Best Available Techniques (BATs) to mitigate and minimise any adverse effects on health and quality of life (e.g. noise, air or light pollution, etc.). Proposals for major development schemes should also be supported by Noise Assessment, Air Quality Assessment (AQA) and Health Impact Assessment (HIA). Policy GWC4 has been updated to include more detail on measures to improve biodiversity and urban greening.
Objections to measures requiring development to buffer residential uses behind less sensitive commercial / non-residential uses as this would no enable developers to maximise the site's development potential and would affect scheme viability. Respondents suggest other	<b>GWC4 Environmental Quality and Open Space</b>	Developers	The Local Plan Review recognises the challenge of the severely constrained availability of sites in the East of the borough to accommodate much needed housing and employment floorspace. Policy GWC3 seeks to ensure site and building design minimises exposure to elevated levels of air and noise pollution through a number of means, including locating sensitive uses

<p>design measures are available to address noise and air pollution impacts</p>			<p>away from existing or planned sources of air and noise pollution through the siting of less sensitive non-residential uses to act as a physical buffer between the roads and more sensitive uses to the rear, and through the provision of noise and vibration insulation, winter gardens and balconies, and the use of greenery to act as a "buffer" along the A4/M4 corridor and other streets. This is in lien with emerging Policy SI1 of the draft new London Plan.</p>
<p>Concerns raised that the Plan does not do enough to address air and noise pollution and should focus more on reducing the volume of traffic passing through the area, enforcing speed limits on strategic roads, improving walking and cycling infrastructure, increasing the number of pedestrian crossings over the A4/M4, extending the ULEZ to cover the GWC, introducing dedicated bus lanes along the A4, enhancing rail connectivity, introducing zero emissions buses etc</p>	<p><b>GWC4 Environmental Quality and Open Space</b></p>	<p>Community groups, individuals</p>	<p>Policies within the draft submission version of the Plan has been prepared in accordance with draft London Plan policy SI1 by implementing suitable measures that enable will enable development within the opportunity area to become Air Quality Positive. Policy GWC3 and GWC6 introduce a number of measures that will actively reduce air and noise pollution, including: requiring public realm to be designed in accordance with the Mayor's Healthy Streets Approach, introducing parallel clean air routes for pedestrians and cyclists, limiting the provision of car parking where appropriate and managing the use of existing parking through the potential introduction of a Workplace Parking Levy, introducing Electric Vehicle (EV) charging spaces and the accommodation of car clubs, improving public transport connectivity, working with TfL and bus operators to develop zero exhaust emission bus services and routes along the Corridor, requiring developments to increase urban greening through scheme design. The ULEZ is part of a package of measures the Mayor and TfL are putting in place and will extend up to the North and South Circular roads from 25 October 2021.</p>

<b>GWC5 Transport and Connectivity</b>			
<b>Total number of responses: 30</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
Support for emphasis placed upon improving walking and cycling infrastructure in the area but desire for stronger policy wording promoting active travel to address issues around air pollution, traffic congestion and public health	<b>GWC5 Transport and Connectivity</b>	TfL, community groups, individuals	Support welcomed. Promoting active travel to and from home, work, schools and community facilities is an important part of supporting residents to lead healthy lives, reducing traffic congestion at peak times and improving air quality. This is reflected in draft submission plan policy GWC6 and Place policies P1, P2 and P3 which have been prepared in line with the Mayor's Healthy Streets Approach. The Council will continue to work with TfL, land owners, and local stakeholders to improve the cycling provision across the borough, including along the A4 and Boston Manor Road.
Concern that the level of growth promoted in the Plan will not be supported by adequate provision of public transport infrastructure – including the delivery of major 'game-changing' rail infrastructure projects - and active travel measures, and that the delivery of development prior to key strategic transportation improvements will exacerbate existing issues around congestion and poor air quality. Particular concern is raised in relation to the Southall Crossrail rail link and West London Orbital link projects being dependent on third parties and delivered outside of the Plan period	<b>GWC5 Transport and Connectivity</b>	Community groups, individuals	The Council has worked with TfL to produce an extensive Strategic Transport Study (STS) to support the draft submission version of the Plan. This has been prepared to address existing and projected future transport network capacity issues and proposes a comprehensive programme of recommended enhancements that will ensure that the transportation network can handle the additional capacity needed as development comes forward. Development phasing has been considered in the draft submission version of the Plan to ensure that development is delivered to coincide with improvements to public transport accessibility, as set out in the STS. The Council has assessed the deliverability of the Brentford-Southall Crossrail link and the West London Orbital link and considers them deliverable within the plan period. Funding for strategic transportation projects is a priority for the Council and funding mechanisms will be formalised as the projects progress. More details of this can be found in the IDP.

Request for more pedestrian and cycle crossings across the A4 to aid connectivity and improve pedestrian safety	<b>GWC5 Transport and Connectivity</b>	Community groups, individuals	The Plan has been prepared in line with the Mayor's Healthy Streets approach to improve air quality, reduce congestion and deliver an attractive and safe public realm that promotes active travel to better connect the Great West Corridor with surrounding stations, town centres, neighbourhoods, Kew Pier River and other key destinations. The Council will continue to work with TfL to improve and optimise crossings along the A4.
Requests that the Plan does more to promote improvements to bus services serving the GWC Corridor and surrounding areas, particularly increasing the number and frequency of service along the A4	<b>GWC5 Transport and Connectivity</b>	Community groups, individuals	The Council has been working with TfL to determine the feasibility of improved transport options along the A4 and policy GWC6 sets out how the Council will work with developers, partners and stakeholders to deliver improvements and extensions to existing bus services, routes, and infrastructure, and/or provision of new bus routes and infrastructure, including improvements to frequency and duration of services, bus priority measures, improved bus stops and real time information
<b>GWC Place Policies</b>			
<b>Total number of responses: 47</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
Comments in relation to the current status and route of the Boston Manor boardwalk scheme and Boston Manor Road cycleway	<b>GWC P1 Great West Corridor West</b>	Community groups, individuals	The Council will continue to show support for the Boston Manor Boardwalk, and will work with the stakeholders involved to plan the most effective and safe route appropriate, particularly in areas where it is to be a shared or segregated pathway. The proposed route of the Boston Manor Boardwalk shown on plans is indicative and has been proposed to give the most direct access from the Sky campus to Boston Manor tube. The Council is working with TfL to carry out improvements to the cycling facilities along the A4 and Boston Manor Road.
General concern relating to the quantum of development in the area and the impact this will	<b>GWC P1 Great West Corridor West</b>	Community groups, individuals	The Council has worked with TfL to develop the Strategic Transport Study and to incorporate the Mayor's Healthy Streets approach

have upon traffic congestion in the area, particularly around Gillette Corner. It is suggested that buildings should be set back from the A4 corridor to facilitate suggested transport and highways improvements			in Plan policies. This has informed the development of GWC Transport and Place policies in the draft submission version of the Plan, including improving street legibility, pedestrian safety, cycle infrastructure, public realm and accessibility.
Concerns around the allocation of the Tesco Osterley site for intensification of the retail use and the introduction of residential use given likely increase in traffic congestion and air pollution. Objection that this has been allocated without full consultation of local residents.	<b>GWC P1 Great West Corridor West</b>	Community groups, individuals	The inclusion of the proposed intensification of the Tesco Extra Site on Syon Lane in GWC Local Plan Review does not constitute an 'approval'. Any development on the site would be subject to planning permission, including consultation with residents and relevant Transport and Air Quality Impact Assessments. More generally, the Strategic Transport Study provides evidence to support the strategic infrastructure needed within the GWC area to support anticipated growth whilst addressing issues such as traffic congestion. The study is a key evidence document and amended policies in the draft submission version of the document have been developed in accordance with its findings. Detailed proposals for the Tesco Osterley site are set out in the Volume 2: Site Allocations document.
Place policies do not include sufficient measures to support healthy lifestyles for residents and healthy workplaces for workers	<b>GWC P1, P2 and P3</b>	LB Hounslow Public Health	Place policies have been amended to emphasise the need to better consider how regeneration of the area can best address Health and Wellbeing. Furthermore, Policy GWC3: Health and Well Being has been added to provide further detail at a strategic level.
It is suggested that GWC P1 West Place policy should include more on the provision of open space, public realm and amenities to serve local residents and workers.	<b>GWC P1 Great West Corridor West</b>	Community groups, individuals	Comments noted. Policy GWC P1 has been amended to include more detail on provision of open spaces and public squares, improvements to access, facilities and landscaping of within existing open spaces and the creation of an attractive arrival square to the south west of the proposed Golden Mile Station, with active ground floor A1 – A4 retail uses.

<p>Residents express concern over development proposals for Brentford Station, including the land adjacent to the railway line on the west side of Boston Manor Road, as this impact upon the operation of the Kings Arms Bar and Hotel, the character and setting of Victorian terraced housing along Orchard Road and adjoining roads, and local views. Objection to the inclusion of the residential streets south of the Corridor and north of the railway line at this point within the GWC (central) area.</p>	<p><b>GWC P2 Great West Corridor Central</b></p>	<p>Orchard Road Residents Group, individuals</p>	<p>Any development coming forward would be expected to mitigate any detrimental effects it may have on surrounding businesses and would have to respect local context and character. The council is not proposing tall buildings on this site, rather a low rise building that improves the arrival experience around Brentford Station, including provision of a small local shop or cafe. Building heights will be determined by design and will take into consideration the character of the area. Any development coming forward would have to conform to adopted Local Plan policy CC1 Context and Character. Besides the Brentford Station site, there is no further development planned for the Victorian streets south of the A4/M4; they are included to show the improved connectivity proposed for the area and connections to Brentford station.</p>
<p>Any proposals for a further bridge over the Grand Union Canal / River Brent between the railway bridge and the A4 will require early involvement with relevant bodies and land owners. Concerns around an additional bridge introduced into this short, uninterrupted stretch between existing bridges, and would suggest that any new bridges provide a proper connection to the towpath.</p>	<p><b>GWC P2 Great West Corridor Central</b></p>	<p>Canal and River Trust</p>	<p>The bridge shown between the A4 and the railway bridge is an aspirational proposal to improve the connectivity of the proposed new developments within the River Brent Quarter and Brentford station. The exact position has not been determined. Interaction with the waterfront is a key focus of any new development in that area, therefore a bridge spanning the River Brent would be expected to connect with the towpath. The Council will consult the relevant bodies and land owners in relation to proposals for any bridges at the earliest opportunity.</p>
<p>Objection to the draft policy which prescribes a maximum height range within the area and consider that this is inappropriate as it will undermine the ability of the area to optimise the use of land on sites such as Phoenix Trade Park.</p>	<p><b>GWC P2 Great West Corridor Central</b></p>	<p>Developers (RLAM)</p>	<p>Policy GWC5 and places policy P2 represent a reasonable and justified response to the evidence base and to the scale of development which has been coming forward, and seek to provide a comprehensive and co-ordinated masterplan-led response to managing development. Providing a band of acceptable heights is compliant with the draft Draft New London</p>

			Plan and allows new development to appropriately address setting and context. The heights proposed have been tested to ensure that the integrity of the existing uses are retained while maximising land use.
<p>Objections to the suggested height ranges proposed for tall buildings in this area which would not respect the existing low-rise context and character of the area and would result in harm to important heritage assets in the surrounding area and views from such. Particular concern is raised around the Brentford Stadium scheme being seen as a catalyst for growth rather than as a unique case approved in order to fund the new Stadium. It is recommended that the heights set out in the heights framework should be reduced in policy.</p>	<b>GWC P3 Great West Corridor East</b>	Community Groups (WCGS), individuals	<p>The Stadium scheme was approved as an exceptional case however in the intervening period the GWC has been designated as an Opportunity Area in the emerging New London Plan. The significant increase in housing targets set out in the new London Plan has also added to the need to consider further residential growth in the area. The Council recognizes that this is a challenging situation and has accordingly commissioned the GWC Masterplan in order to identify ways to facilitate growth capacity without resulting in significant harmful change to the area. The plan policies represent a comprehensive masterplanned and coordinated response to managing new growth rather than taking a scattered and ad hoc approach to development in the area, which would ultimately result in more harm. The location and heights of tall buildings have been identified through careful consideration and analysis of the impact of taller developments on adjacent heritage assets and strategic and local views. The Council also strives to establish a clear and legible cityscape for the area which is, in part, the result of testing of heights and locations for this building type through the GWC Local Plan Review.</p>
<p>Objections raised in relation to the heights framework for the area being too proscriptive and not providing the ability of select sites to maximise site capacity through tall and landmark buildings in order to achieve the aims of the plan to provide for housing and employment growth, or create an attractive</p>	<b>GWC P3 Great West Corridor East</b>	Developers	<p>The policy has been determined on a site by site basis and within a design framework, which recognizes some sites may be better suited for mid rise tall buildings and taller focal buildings. The policy is considered to be a reasonable and justified response to the evidence base and scale of development which has been coming forward, which seeks a comprehensive masterplanned co-</p>

<p>urban landscape. Questions are raised as to the robustness of the evidence base used to support this policy approach.</p>		<p>ordinated response to managing development, rather than a scattered approach. Providing a band of acceptable heights is compliant with the Draft New London Plan and allows new development to appropriately address setting and context. The Council's background work to the Local Plan for the GWC - the Great West Corridor Masterplan - explores options for assessing proposals for tall buildings. The selected option aims to strengthen the area and its character through the creation of a comprehensive and coordinated cityscape and skyline of buildings in identified locations and with tested and identified heights. The polices are based on current and forecast housing need, but this does not preclude applicants making exceptional cases, which they will be expected to justify in all respects in order to allow the Council to consider all material considerations as it would in assessing any application.</p>
--	--	--

**GWC IIA, Supporting Documents and Misc.**

**Total number of responses: 16**

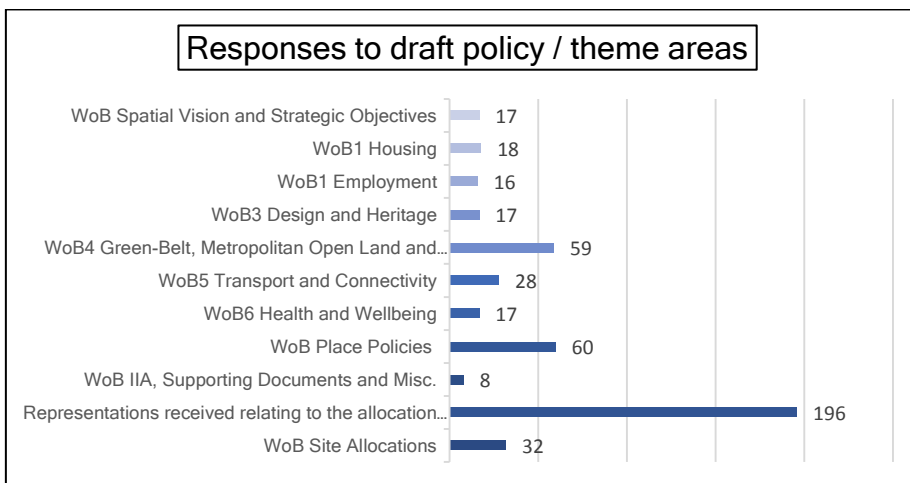
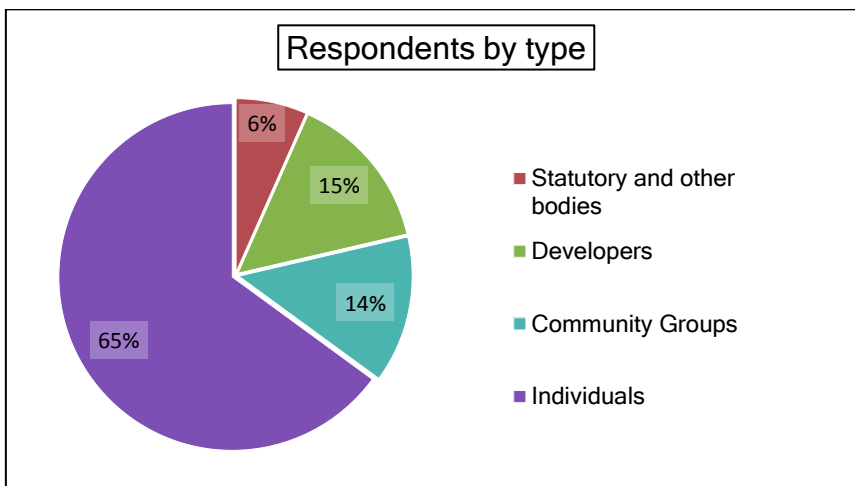
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
<p>The Plan is too focused on employment-led mixed-use redevelopment and should be amended to promote residential-led development.</p>	<p><b>GWC IIA, Supporting Documents and Misc.</b></p>	<p>Developers</p>	<p>The Council recognizes the need for the delivery of homes in the area and for this reason the policy identifies the acceptability of mixed-use re-development. However, the area still remains an important location for employment uses and includes Locally Significant Industrial Sites and Key Existing Office Locations.</p>
<p>The Plan does not go into sufficient detail as to how additional school places to support local population growth are being planned. Request that requirements for schools need to be realistically demonstrated, and the Plan should show how facilities will be</p>	<p><b>GWC IIA, Supporting Documents and Misc.</b></p>	<p>Community groups, individuals</p>	<p>The schools team have been consulted throughout Plan preparation. The Infrastructure Delivery Plan (IDP) 2019 sets out the current and future infrastructure needs to support development, including schools, and policy GWC7 sets out how the Plan will ensure that the required physical and social infrastructure will be provided in a</p>

provided close to existing and future resident's homes.			planned approach as development proposals come forward.
Further planned major development in this area will not be sustainable unless and until the necessary physical, transport and community infrastructure has been delivered.	<b>GWC IIA, Supporting Documents and Misc.</b>	Community groups, individuals	The Infrastructure Delivery Plan (IDP) 2019 sets out the current and future infrastructure needs to support development and policy GWC7 sets out how the Plan will ensure that the required physical and social infrastructure will be provided in a planned approach as development proposals come forward.
The GWC boundary should be redrawn to remove existing low-rise residential streets north and south of the A4/M4 Corridor, including the Victorian streets south of the A4 and north of Brentford Station	<b>GWC IIA, Supporting Documents and Misc.</b>	Orchard Road Residents Group, individuals	When designating an Opportunity Area in the London Plan the GLA look at potential sites to accommodate growth as set out in their Strategic Land Availability Assessment (SHLAA). The boundary was drawn and amended using this key evidence along with extensive engagement from public and members. The residential streets south of the A4 and north of the railway referred to are included to show the improved connectivity proposed for the area and the improved connections to Brentford station
The Integrated Impact Assessment (IIA) to support the draft submission version of the GWC Plan review should be amended to include more detailed assessment of flood risk, biodiversity impact and water quality and waste water infrastructure.	<b>GWC IIA, Supporting Documents and Misc.</b>	Environment Agency	The IIA has been updated in line with comments received by statutory bodies and this will support the draft submission version of the Plan.
<b>GWC Appendix 1: Site Allocations</b>			
<b>Total number of responses: 18</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
<i>Given the specific nature of comments relating to site allocations, comments have not been summarised here. See Appendix 1 of this statement for a detailed summary of consultation responses relating to this part of the Plan.</i>	<b>GWC Appendix 1: Site Allocations</b>	Statutory and other bodies, developers, community groups, individuals	<i>Given the specific nature of comments relating to site allocations, comments have not been summarised here. See Appendix 1 of this statement for a detailed summary of consultation responses relating to this part of the Plan.</i>

5.19 Detailed summaries of the GWC Regulation 18 (Preferred Options) consultation responses and the Council’s responses to issues raised are included in Appendix C.

### Regulation 18 WoB (Preferred Options) Draft Local Plan review

5.20 In total, 468 responses to the Regulation 18 WoB (Preferred Options) draft Plan were received. The tables below break down responses by respondent type and policy / theme area.



**Table 3.6: Summary of main issues raised in relation to the Regulation 18 WoB (Preferred Options) Local Plan review**

WoB Spatial Vision and Strategic Objectives			
Total number of responses: 17			
Summary of Main Issues	Relevant Policy Point	Respondent	LBH Response / Action
WoB Plan emphasises growth	WoB Spatial	Community	Comments noted. The WoB Plan is

and neglects counterbalancing environmental improvements in terms of green infrastructure improvements, the quantum and quality of open space and measures to improve the health and wellbeing of residents	Vision and Strategic Objectives	groups, individuals	considered to be balanced in its approach to meeting objectively assessed needs for homes and jobs whilst delivering enhancements to the local environment, including green infrastructure improvements, and taking measures to improve the health and wellbeing of residents. This is reflected in the spatial vision and strategic objectives, as well as the strategic and Place policies set out in the Plan.
The WoB Plan Vision must take account of the need to safeguard employment land to support balanced growth / sustainable patterns of development and, in line with Draft London Plan, retain sufficient industrial and logistics capacity by seeking, as a general principle, no overall net loss of industrial floorspace capacity in designated Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs)	WoB Spatial Vision and Strategic Objectives	Developers (SEGRO)	Comments noted and Policy WoB1 'Employment Growth' requires development proposals to provide no net loss of industrial floorspace and where feasible, intensify uses suitable for broad industrial type activities, as set out in draft new London Plan Policy E7 on Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS)
The Spatial Vision and Strategic Objectives focus too much on Heathrow airport and ignores existing needs and opportunities	WoB Spatial Vision and Strategic Objectives	Community groups individuals	Comments noted and vision and objectives have been amended to reflect the on-going engagements with the community organisations, residents, businesses , landowners and stakeholders.
<b>WoB1 Housing</b>			
<b>Total number of responses: 18</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
The initial proposed capacity for new homes in the area is premature due to the publication of the draft Replacement London Plan which will revise the existing housing delivery targets. The Council should ensure that the housing requirement can be met over the Plan period and it will be necessary to ensure sufficient sites are identified and allocated for residential use. Policy	WoB1 Housing	Developers	The plan recognises and seeks to meet the targets for the Opportunity Areas in the Draft London Plan. The Council has completed a Site Allocations and Capacity Assessment (SAC) which has sought to fully explore options and capacity for growth. Chapter 6 of the plan focuses on ensuring that the development of sites is predicated on delivery of physical and social infrastructure to support them.

should be more flexible so that it can address potential delays in delivery of some sites, including matters of development viability and ownership issues			
The initial proposed housing capacity is too high and will place pressure on already limited infrastructure, especially in Feltham. There is also little mention of specialist provision for the elderly or those in care.	WoB1 Housing	Community groups, individuals	The WoB Plan Review aims to meet the identified need in the SHMA, including that for older people and specialist housing. The council has identified several site allocations within Feltham to provide an additional school and community use floorspace as part of the regeneration of Feltham. The WoB Plan Review should be read alongside out existing Local Plan (2015). Policy SC8 in the Local Plan encourages the provision of Specialist and Supported housing in line with the results of the Strategic Housing Market Assessment (2018).
Concern raised in relation to the quantum of housing proposed on the Heathrow Gateway site being overly reliant upon the provision of strategic public transport infrastructure	WoB1 Housing	Community groups (Tidal Crane Association)	The Heathrow Gateway is identified as a broad location for growth, indicating that the council will seek to deliver the site but will considers this to be dependent on the delivery of the Southern Rail Access.
<b>WoB1 Employment</b>			
<b>Total number of responses: 16</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
Objection to policy approach of using de-designated Green Belt to help 'close the gap' between demand and supply of industrial land instead of favouring more rigorous prioritisation of brownfield land for employment uses	WoB2 Employment Growth	Community groups (FORCE)	The Council has undertaken a Green Belt Assessment in line with national policy to test options for releasing a limited number of sites from the Green Belt, and has proposed such releases for employment uses only where it considers that exceptional circumstances have been demonstrated.
Concern raised around the dependence on relying upon Heathrow, and its potential expansion, for jobs in the West of borough area and that there is little support for smaller firms employing residents	WoB2 Employment Growth	Individuals	The Local Plan review seeks to identify appropriate sites for a wide range of businesses to establish themselves or expand in the borough. The Council continues to work with employment services to provide local employment opportunities. The Local Plan seeks to identify further employment land and the approach taken is

			supported by the evidence base, namely the Employment Land Review 2016.
Concern raised around employment policy failing to ensure sufficient alternative locations for growth and development have been considered to meet growth requirements and that the Plan does not maximise the potential benefits to be achieved through the expansion of Heathrow Airport	WoB2 Employment Growth	Developers (Windowflow ers Ltd.)	The Council has followed the evidence base in the ELR in identifying and supporting opportunities for industrial intensification of existing employment sites where appropriate. Beyond this, the Council has undertaken a Green Belt Assessment in line with national policy to test options for releasing sites from the Green Belt, and has proposed such releases where it considers that exceptional circumstances have been demonstrated. This allows the plan review to deliver a very large proportion of the assessed requirements for additional floorspace for employment floorspace.
<b>WoB3 Design and Heritage</b>			
<b>Total number of responses: 17</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
The WoB Plan should take a less restrictive approach to tall buildings – including ‘landmark’ buildings - and to increasing densities on sites within the area in order to meet housing delivery targets	WoB3 Design and Heritage	Developers	The policy is considered to be a reasonable and justified response to the evidence base and scale of development which has been coming forward, which seeks a comprehensive masterplanned co-ordinated response to managing development. The policy is in line with Policy D2(d) of the Draft New London Plan. There can be confusion between the terms tall and landmark buildings, which highlights the need for the policy. That being said should exceptional tall landmark buildings come forward on other sites they will be considered on their merits.
The WoB Plan could do more to conserve and enhance designated and un-designated heritage assets, and should be informed by a sufficiently detailed evidence base	WoB3 Design and Heritage	Historic England, Individuals	Policy WoB5 has been amended and refined to better reflect the important and positive relationship between design quality and the historic environment. Comment Noted re evidence base for historic environment. The Council considers that the evidence base has been sufficiently referred to in the text.

There is strong support for the heritage-led restoration of Hanworth Park House	WoB3 Design and Heritage	Individuals	The Council has considered the proposed site allocation and has made adjustments where considered appropriate. The Council will support proposals that lead to the sensitive refurbishment of Hanworth Park House.
Concern raised in relation to the approach to tall buildings and increased densities as part of proposed regeneration of Feltham Town Centre	WoB3 Design and Heritage	Individuals	The indicative scale of development is based on a justified and reasonable approach arising from the evidence base. The Feltham Place Policy seeks to protect local character and identify suitable locations for landmark buildings as well as identify important view corridors for protection. The Design and Heritage Policy WoB5 has been amended to clarify a common misconception that landmark quality equates to height. In addition to height, landmark quality can be achieved through numerous features including building style, materials, design and window patterns, vertical or horizontal articulation amongst others.

**WoB4 Green-Belt, Metropolitan Open Land and Open Space**

**Total number of responses: 59**

<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
Objection to proposals to allocate 110 hectares of green space, including 101 hectares of Metropolitan Green Belt, for development when these parcels continue to fulfil the purposes of Green Belt. Responses note that this is in direct contradiction to London Plan policy. Questions raised over: the council's 2017 Green Belt review which is considered to be flawed and reaches erroneous conclusions; the density of development outlined in the site allocations, with capacity considered to be in excess of the stated requirement for commercial/industrial space;	WoB4 Green-Belt, Metropolitan Open Land and Open Space	GLA, CPRE, community groups, individuals	Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at a strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional

<p>the assessment of sustainable development not being adequate; the strength of arguments and evidence for exceptional circumstances; whether all brownfield land has been fully for development potential prior to the Green Belt Review taking place; a lack of transparency around how site allocations and Green Belt Review sites are related as these are not cross referenced; and the allocation of Green Belt sites for housing when it is considered that double the amount of land is being allocated for housing than is likely realistically to be used in the plan period</p>		<p>circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the</p>
--	--	--

			Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.
Objections to proposals to re-designate large sections of Green Belt to Metropolitan Open Land (MOL) as it is considered that these parcels of land continue to perform key Green Belt functions in holding back urban sprawl and stopping towns from merging. These sites should not be re-designated and should remain as Green Belt. Further concern raised that MOL does not offer the same level of protection as Green Belt and could result in some sites being developed in future.	WoB4 Green-Belt, Metropolitan Open Land and Open Space	GLA, community groups, individuals	In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL.

### WoB5 Transport and Connectivity

**Total number of responses: 28**

<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
Concerns raised in relation to Southern Rail Access (SRA) proposals including the merits of the Council's supported alignment option (via Bedfont), the potential connectivity to other rail services and the deliverability of the project. Concern also raised in relation to the safeguarding of land for development related to the SRA, including the new Station at Clockhouse Roundabout.	WoB5 Transport and Connectivity	TfL, community groups, individuals	The Council has carried out a Transport Impact Assessment to provide a strong evidence base in support of transport proposals put forward in the draft West of Borough Local Plan Review. The Council sees the SRA alignment with a station at Clockhouse Roundabout as a game-changing piece of infrastructure that will bring much needed improvements to rail connectivity in the area. The Council will continue to work with strategic partners such as TfL, DfT and rail service providers to promote the project and support delivery. The SRA alignment has not yet been confirmed so no comments on the potential loss of land can be given at this time. Initial feasibility studies have been carried

			out, however a full impact assessment will be carried forward following further support from strategic partners for the Hounslow alignment. The alignment shown in the Draft WoB Local Plan review is indicative and represents a design interpretation of the proposed SRA route. The Council will continue to consult with the community as plans for the Southern Rail Access link come to fruition.
Support for enhancements to the cycling network and walking network, including between residential and employment areas and around transport hubs / interchanges. Concern that the Council needs to do more to support active travel in this part of the borough, especially around improving walking and cycling options between the local centres and Heathrow Airport.	WoB5 Transport and Connectivity	TfL, community groups, individuals	The Council is working with TfL, developers, and the community to improve cycling infrastructure provision across the Borough which includes improved cycle lanes, increasing cycle parking infrastructure and providing cycle safety education. Policies WoB3 and WoB6 have been amended to bring them in line with the Mayor's Healthy Streets approach. The Council will continue to work with Heathrow to ensure surface access arrangements relating to active travel infrastructure have been carefully considered as part of the Heathrow expansion project.

### WoB6 Health and Wellbeing

**Total number of responses: 17**

Summary of Main Issues	Relevant Policy Point	Respondent	LBH Response / Action
Policy should place more emphasis on improving residents' health and wellbeing through promoting active travel, improving green and public space provision and limiting air pollution.	WoB6 Health and Wellbeing	TfL, community groups, individuals	Comment noted and policy WoB3 and Place policies have been amended to provide more detail how the Council intends to promote health and wellbeing through the WoB Plan. Policies have been amended to bring them in line with the Mayor's Healthy Streets approach and to reflect the need to ensure development in the area is air quality positive in line with draft New London Plan policy S11.

### WoB Place Policies

**Total number of responses: 60**

Summary of Main Issues	Relevant Policy Point	Respondent	LBH Response / Action
Feltham is an appropriate location for higher density	WoB P1 Feltham	GLA, developers	Comments noted. The proposed policies on heights and density in

re-development and policy should not set overly restrictive heights limits which might stifle development, particularly within the proposed Station Quarter			Feltham are derived from the Feltham Masterplan. Locations for taller buildings have been identified and are subject to stricter design controls, included in Tall Buildings policy CC3 in the Local Plan. The locations for taller buildings in the Station Quarter identified in the Feltham Place policy WoB P1 and Figure 5.3.
Feltham is not an appropriate location for higher density and tall building development, and should not be considered for such simply due to its designation as a London District Centre. Concern is also raised in relation to the impact of tall buildings upon local heritage assets, particularly in Station Quarter.	WoB P1 Feltham	Community groups, individuals	Comments noted. The classification of Feltham as a District Centre is made by the Mayor in the London Plan, not by the Council. However the Council supports the recognition of Feltham as a key retail and employment destination for the wider area. Place Policy WoB P1 limits new development in Feltham to six storeys, with the exception of landmark buildings in two locations indicated in the Places policy map. The proposed development in the Station Quarter was subject to an extensive masterplanning exercise which took the Conservation area and other heritage and natural assets into consideration. The plan requires proposed development to seek to protect and enhance the conservation area and ensure that any development integrates with existing character in order to form a legible change in character.
Objection to development of the Showpeople site at Station Estate Road due to the impact upon the Showpeople community, and Feltham Marshalling Yards due to the impact upon the site of importance for nature conservation (SINC)	WoB P1 Feltham	Community groups, individuals	Having completed an assessment of potential suitable alternative sites for re-provision to meet the needs of the existing community, the council will no longer be pursuing this option in the plan. Likewise, Feltham Marshalling Yards is no longer allocated for redevelopment as part of the WOB Plan. Support noted regarding the improvements proposed to the Longford River.
Objection to the de-designation of Green Belt in order to facilitate development and to the proposed density and unit mix given impacts to existing surrounding	WoB P2 Bedfont Lakes Neighbourhoods	GLA, community groups, individuals	The Council views the delivery of strategic transport infrastructure such as the SRA link an exceptional circumstance in which to release land for delivery of housing and the accommodation of rail infrastructure. Densities proposed

neighbourhoods. The importance of the Southern Rail Access (SRA) to the development potential of the site is not made clear			in the WoB Local Plan review policies have been design tested to ensure they are appropriate for the neighbourhood context. The Council views the current proposal for new housing and community space at Bedfont Lakes neighbourhoods maximises the delivery of family housing while improving the quality of open space given site constraints such as the Heathrow Logistics Park
Objection to the de-designation and development of the Heathrow Gateway site in the Green Belt. The importance of the Southern Rail Access (SRA) to the development potential of the site is not made clear	WoB P3 Heathrow Gateway	GLA, community groups, individuals	Paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. The Council views the delivery of strategic transport infrastructure such as the Southern Rail Access link an exceptional circumstance with enabling development to help meet our objectively assessed need for homes and employment. Densities proposed in the WoB Local Plan review policies have been design tested to ensure they are appropriate for the neighbourhood context.
Issues such as traffic congestion and air quality should be fully addressed, as well as the provision of community infrastructure, for health and community facilities	WoB P3 Heathrow Gateway	Community groups individuals	Place policy P1 has been amended to provide more detail on measures to address traffic congestion and air quality, including, the need to ensure development in the area is air quality positive in line with draft New London Plan policy SI1. The place policy includes provision of local amenities such as small shops and cafes, well-defined pedestrian and cycle greenways and enhanced open spaces and sports and recreational facilities.
The place policy and site allocation as currently drafted do not refer to the fact that the site has been safeguarded for mineral extraction.	WoB P3 Heathrow Gateway	Harleyford Aggregates Limited (Company)	Commented noted. The place policy and site allocation have been amended to include the need to require the extraction of aggregate resources on site before development can take place.
Concerns raised in relation to the impact of development upon important	WoB P3 Heathrow Gateway	Individuals	Any development would need to take full account of the Archaeological Priority Area

archaeological sites in this location			designation and the Scheduled Ancient Monument and be undertaken in accordance with relevant policy protecting these heritage assets.
Objection to the de-designation of the site for industrial intensification within the Green Belt, particularly given the existence of alternative sites for logistics and other airport related development elsewhere	WoB P4 Airport Business Park	GLA, individuals	The Council notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow with or without a third runway and this would be likely to cause harm to

			the local economy and to miss out on potential jobs growth opportunities. The Airport Business Park site would offer good access to the airport, the national motorway network and London's strategic road network. The adjacent Piccadilly Line tube station and local bus services would offer public transport choices for the local workforce. The site would be capable of becoming a major logistics hub, handling air cargo and freight, and it could also accommodate other light industrial businesses with a range of unit sizes providing over 3,800 new jobs
Concern that the Place policy does not do enough to protect and enhance existing open space and green infrastructure, active travel provision (including the Greenway cycle route) and local biodiversity given that part of the site is covered by a site of nature conservation (SINC)	WoB P4 Airport Business Park	FORCE, individuals	Comment noted. The Place policy has been amended to provide more clarity on open space, green infrastructure provision and active travel – including walking and cycling routes. Where development would result in the loss of part of sites of Importance for nature Conservation (SINCs), development should secure a net increase in biodiversity through provision of improvements to other local sites
The site is not appropriate for industrial intensification given congestion and air quality impacts resulting from additional freight movements. Suggestion that residential uses should be promoted on this site.	WoB P4 Airport Business Park	Individuals	The Council consider that this site is suitable for Industrial uses due to its proximity to Heathrow and its access to the national and strategic road network, as well as Heathrow Airport's Perimeter Road.
The Place policy should ensure that any development or regeneration of Cranford and Heston improves the connectivity of open spaces, in particular by solving the severance of the River Crane corridor by the A4, and by improving pedestrian and cycle links with the surrounding neighbourhoods and centres	WoB P5 Cranford and Heston Neighbourhoods	Community groups, individuals	The Cranford and Heston Place Policy identifies the need to improve the connectivity of open spaces through enhancing walking and cycle routes, which connect the existing river corridor to other green spaces, such as Airlinks Golf Course and Osterley Park and to the national cycle route along the Grand Union Canal. Practical or technical details of proposed links shown in the plan will be assessed as part of planning applications and associated masterplan studies. The Local Plan Review provides a strategic policy framework to

			support the implementation of these links
Cranford and Heston Place Policy Hounslow needs to give full consideration to the potential exposure to poor air quality when allocating housing adjacent to major roads	WoB P5 Cranford and Heston Neighbourhoods	GLA	Comment noted. Policies WoB3 and P5 have of the draft submission WoB Plan has been prepared in accordance with draft London Plan policy SI1 and aim for the area to become Air Quality Positive through implementing measures that will actively reduce air pollution within the opportunity area.

**WoB IIA, Supporting Documents and Misc.**

**Total number of responses: 8**

<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
Questions relating to the boundary of the WoB Plan area and the omission of Hanworth from the Plan	WoB IIA, Supporting Documents and Misc.	Developers, individuals	Comment noted. The boundary is set out in the main map of the WoB area in the introduction to the Plan.
The Delivery and Monitoring section should explicitly recognise that the provision and management of green infrastructure and open spaces should be funded through planning obligations (s106)	WoB IIA, Supporting Documents and Misc.	FORCE	Developer contributions will be sought to fund most of the infrastructure projects in this Plan and this is set out in amended policy WoB7 in the draft submission version of the Plan.
Concerns raised in relation to how both the Integrated Impact Assessment and Local Plan policies and allocations have taken into consideration key sustainability impacts in terms of biodiversity and nature conservation, flood risk, and the impact of development upon waste quality and waste water infrastructure.	WoB IIA, Supporting Documents and Misc.	Environment Agency	Comments noted, the draft submission version of the Plan is supported by an updated IIA and HRA and the comments raised have been taken into account during the preparation of these reports. Place policies and strategic policy WoB4 have been amended to reflect the need to ensure that development in these areas conserves biodiversity and results in a net gain in biodiversity wherever possible. The Council has been working with Thames Water to understand the potential impacts of development growth upon water quality and waste water infrastructure.

**Representations received relating to the allocation of the Travelling Showpeople Site, Station Estate Road, Feltham**

**Total number of responses: 196**

<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
196 representations were received in relation to the Travelling Showpeople site at	Representations received relating to	Individuals	Comments noted. Having completed an assessment of potential suitable alternative sites

Station Estate Road, Feltham. These largely considered the impact of Plan proposals upon this particular community, including: the strong ties between the Travelling Showpeople community and the area, the historical and cultural importance of the site, the unique requirements of Travelling Showpeople as a group, the lack of appropriate and available sites elsewhere, the effects of the proposal on the mental health of members of the affected community, amongst other issues.	the allocation of the Travelling Showpeople Site, Station Estate Road, Feltham		for re-provision to meet the needs of the existing community, the council will no longer be pursuing this option in the plan.
<b>WoB Site Allocations</b>			
<b>Total number of responses: 32</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
<i>Given the specific nature of comments relating to site allocations, comments have not been summarised here. See Appendix 2 of this statement for a detailed summary of consultation responses relating to this part of the Plan.</i>	<i>WoB Site Allocations</i>	<i>Statutory and other bodies, developers, community groups, individuals</i>	<i>Given the specific nature of comments relating to site allocations, comments have not been summarised here. See Appendix 2 of this statement for a detailed summary of consultation responses relating to this part of the Plan.</i>

5.21 Detailed summaries of the WoB Regulation 18 (Preferred Options) consultation responses and the Council's responses to issues raised are included in Appendix C.

## 6. Regulation 19 Pre-Submission Consultation

### Consultation Methods

6.1 The Regulation 19 consultation ran from 30 July until midnight on 24 September 2019. The Council used a range of consultation methods to raise awareness of the draft Pre-Submission Local Plan Reviews consultation and to engage with the public and relevant stakeholders, including the associated public consultation events, both during and before the consultation period. This is summarised below.

6.2 Regulation 19 Consultation announcements were made via a variety of media as follows:

- Hounslow Council website (link: [https://www.hounslow.gov.uk/info/20167/local\\_plan/1545/local\\_plan\\_reviews/2](https://www.hounslow.gov.uk/info/20167/local_plan/1545/local_plan_reviews/2))
- Community and Business Groups (third party) webpage
- Social Networks– Twitter, Facebook, Hounslow Matters magazine, Invest Hounslow
- Emails and letters
- Press notices/releases
- Discussion events/workshops, Drop-in events /exhibitions
- Electronic Screens around the Council Offices

#### *Emails and Letters:*

6.3 Emails and letters were sent to all consultees on the Council's planning policy database. An example of the email/letter sent is included in Appendix E. In addition, a freepost address was made available for receiving written comments and publicised in consultation documents, e-mails, posters and leaflets.

6.4 Hounslow Council also maintains a consultation database of individuals and organisations interested in planning policies. This includes those who have previously responded to consultations on other planning documents, as well as the specific and general consultation bodies. Over 1540 emails and letters were sent to consultees advising them on how to comment. They explained where the consultation documents were available and encouraged recipients to comment. Documents were made available and the consultation publicised via the Council website, local libraries and at community area forum meetings.

*Website:*

- 6.5 A dedicated webpage entitled 'Local Plan reviews' was provided throughout all stages of consultation to facilitate consultation on the development of the local plan review. This webpage was advertised on the Council's planning policy and guidance webpage on the Hounslow website
- 6.6 This webpage advertised all consultation activities and included a link to the Council's online consultation portal ('Citizen Space') where the public could submit comments on the Local Plan review documents. The webpage contained extensive information including an explanation of how the public could get involved, guidance on how responses should be submitted and what they should cover, details of where people could view draft plans and evidence base documents and advertising the dates of all consultation events. A link to the relevant webpage on the Council's website is provided here: [https://www.hounslow.gov.uk/info/20167/local\\_plan/1545/local\\_plan\\_reviews](https://www.hounslow.gov.uk/info/20167/local_plan/1545/local_plan_reviews).

*Citizen Space*

- 6.7 In addition to requests for written representations via email or letter, an online questionnaire on Citizen Space was published on the Local Plan review webpage to seek feedback on the planning policies outlined in the Regulation 19 Draft Submission consultation documents. Overall 70 responses were received via this method. The completed questionnaires and a report analysing these responses will be passed along to the Inspector.

*Press/media coverage:*

- 6.8 The draft Local Plan was publicised in local newspapers and websites including the following:
- A Press Notice was published in the 'Chronicle & Informer' newspaper on Friday 26<sup>th</sup> July 2019 (See Appendix E)

*'Hounslow Matters' magazine*

- 6.9 The draft Local Plan reviews were featured in the Hounslow Matters magazine (Summer 2019 edition), an electronic newsletter that is sent out by the Council to approx.500 recipients, including Council Members, organisations in the voluntary sector and other stakeholders in Hounslow (see Appendix E).

*Social media*

6.10 Twitter and Facebook were used to promote consultation events: tweets were sent through the Council’s twitter account @LBofHounslow announcing that the Local Plan reviews were being consulted upon, and the Local Plan Review consultation was featured on [www.facebook.com/hounslowcouncil](http://www.facebook.com/hounslowcouncil) (See Appendix E for extracts promotional material).

*Libraries:*

6.11 Copies of the consultation documents were made available to view at all Hounslow libraries and in the main reception area of Council offices (Civic Centre, Lampton Road) during normal opening hours.

Library	Location
Beavers Library	Salisbury Road Cranford, TW4 7NW
Bedfont library	Staines Road, TW14 8DB
Brentford Library	Boston Manor Road, TW8 8DW
Chiswick Library	Dukes Avenue, W42AB
Cranford Library	Bath Road, TW5 9TL
Feltham Library	High Street, TW13 4GU
Hanworth Library	Uxbridge Road, TW13 5EG
Heston Library	New Heston Road, TW5 0LW
Hounslow Library	B7 Bath Road, TW3 3EB
Isleworth Library	Twickenham Road, TW7 7EU
Osterley Library	St Mary’s Crescent, TW7 4NB

**Table 3.7: List of libraries where Local Plan review documents were made available**

*Consultation Events and Meetings*

6.12 The Council held a series of public consultation events to proactively engage with residents, local organisations, businesses and the wider community. Officers from the Council attended events in order to answer questions, promote discussion and receive comments. All comments have been reviewed and have helped to shape the proposed submission of the Draft Local Plan reviews. For this round of consultation, the Council undertook a number of non-statutory or ‘pre-consultation’ workshops and events over winter 2018/2019 in addition to events/meetings to accompany the formal Regulation 19 consultation (see Appendix F for summary tables detailing some of the matters raised at these events and how the Council has responded). These consultation events/meetings are set out in the table below:

<b><u>Pre-Consultation (Regulation 19) Engagement</u></b>	<b>Great West Corridor Masterplan Review – Developers Workshop</b> Thursday 22 <sup>nd</sup> November 2018 The Mille - 1000 Great West Road, Brentford. TW8 9DW
	<b>Equalities Group workshop</b> Thursday 13 <sup>th</sup> Dec 2018 Hounslow Council Offices
	<b>Great West Corridor Members workshop</b> Wednesday 9 <sup>th</sup> January 2019 Hounslow Council Offices
	<b>West of Borough Members Workshop</b> Thursday 17 <sup>th</sup> January 2019 Feltham Library, The Hub Room, The Centre, Feltham, TW13 4GU
	<b>Great West Corridor Residents and Community Groups pre-consultation (Regulation 19) drop-in session and workshop</b> Thursday 24 <sup>th</sup> January 2019 Brentford Free Church, Boston Manor Rd, Brentford TW8 8DW
	<b>West of Borough Residents and Community Groups pre-consultation (Regulation 19) drop-in session and workshop</b> Thursday 31 <sup>st</sup> January 2019 Feltham Library, The Hub Room, The Centre, Feltham, TW13 4GU
<b>Regulation 19 Consultation Engagement</b>	<b>Local Plan Reviews Members Workshop</b> Monday 2 <sup>nd</sup> September 2019 Hounslow Council Offices
	<b>West of Borough Local Plan Review (Regulation 19) – Community Drop-in and Workshop Session</b> Monday 9 <sup>th</sup> September 2019 The Hub Feltham Library, The Centre, Feltham, TW13 4GU
	<b>Great West Corridor Local Plan Review (Regulation 19) – Community Drop-in and Workshop Session</b> Wednesday 11 <sup>th</sup> September 2019 Holiday Inn, Brentford Lock, Commerce Rd, London TW8 8GA

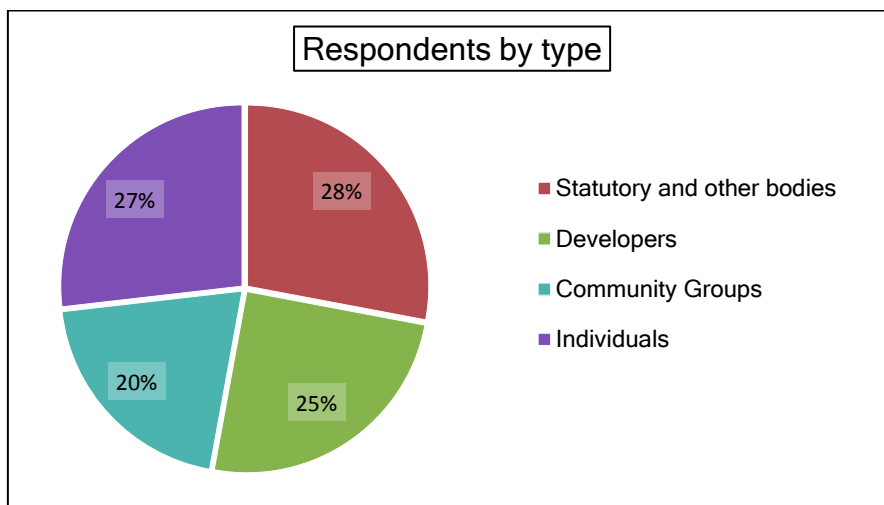
**Table 3.8: List of consultation events, including date, time and location details**

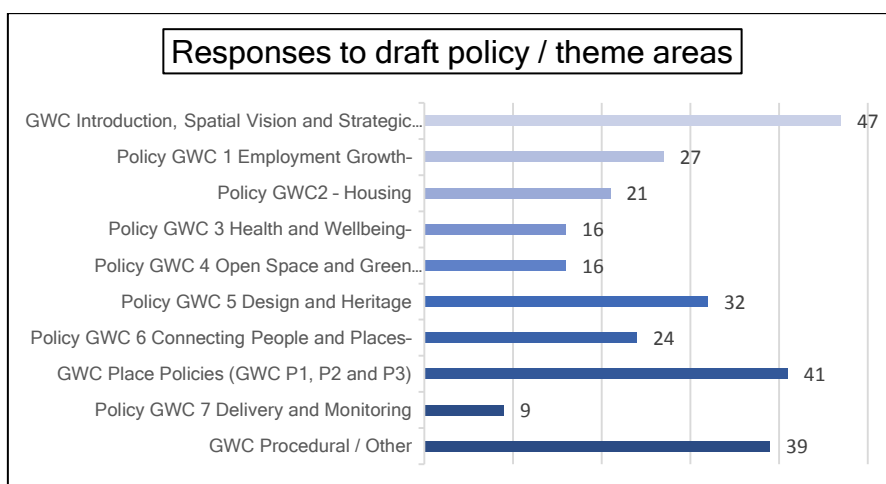
## Summary of Main Issues

- 6.13 The statement provides a summary of the representations made pursuant to Regulation 20 during the Pre-Submission (Regulation 19) consultations undertaken between July – September 2019.
- 6.14 In total, 382 formal written representations (421 including attachments and supporting documents) were received from local authorities, statutory and non-statutory bodies, community organisations, businesses, developers and individuals. In order to respond to representations effectively, comments were compiled to produce 887 responses relating to specific themes or policies contained in the Local Plan review documents: 272 for the draft GWC Plan; 453 for the draft WoB Plan; 181 for the draft Site Allocations; and 61 related to evidence base documents. Representations were received by email, letter and through the Council’s consultation online portal (‘Citizenspace’).
- 6.15 Response breakdowns and summary tables setting out the main issues raised by respondents, along with the Council’s response to the comments received, are provided below.

### Regulation 19 Pre- Submission Draft GWC Local Plan review

- 6.16 In total, 116 representations made pursuant to Regulation 20 were received which related to the Pre-Submission Draft GWC Local Plan Review, generating 272 summarised responses. The tables below break these responses down by respondent type and policy / theme area.





**Table 3.9: Summary of Regulation 20 responses to the Regulation 19 Pre-Submission Draft GWC Local Plan review:**

<b>GWC Introduction, Spatial Vision and Strategic Objectives–</b>			
<b>Total number of responses: 47</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action?</b>
Should the plan be seeking to meet the need for housing and employment assuming Heathrow expansion goes ahead, or should it merely seek to meet development requirements under the status quo?	GWC Spatial Vision and Strategic Objectives	Individuals	The plan review seeks to meet the needs identified as being needed now (our Objectively Assessed Need for housing and employment floorspace), and its strategy is not dependent upon Heathrow expansion. It is clear from the evidence that additional land will be required to support and capture the benefits of Heathrow's growth, whether expansion takes place or not. When decisions relating to Heathrow expansion are more certain LB Hounslow will address this as part of a further Local Plan Review (to be undertaken every 5 years as required by NPPF).
Concern that development will be delivered prior to the delivery of supporting infrastructure, thereby placing undue pressure on existing transport, health, social and other infrastructure	GWC Spatial Vision and Strategic Objectives	Community groups / individuals	The Plan sets out the overarching direction and vision for each place, the strategic matters such as how many homes and jobs must be delivered in each place, include site allocations which are important to delivering the spatial vision, homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of the area. Development has been phased with

			improvements to infrastructure to support growth following extensive engagement with developers and infrastructure providers.
The GWC Plan does not adequately address issues relating to climate change and is not in line with LBH's declaration of a 'climate emergency'	GWC Spatial Vision and Strategic Objectives, GWC3, GWC4	Community groups / individuals	<p>LB Hounslow declared a climate emergency on 23<sup>rd</sup> July 2019 and has been developing a Climate Emergency Action Plan to set out how the Council intends to address the climate crisis. The Local Plan Reviews have been developed following the adoption of the Local Plan 2015 and are now at an advanced stage. It is important to note that the GWC and WoB Plan reviews are both area-focused reviews seeking to guide development within 2 opportunity areas: the proposed Great West Corridor Opportunity Area and part of the Heathrow Opportunity Area within Hounslow. As such, adopted strategic policies relating to climate mitigation and adaptation within the Local Plan 2015 (policies EQ1, EQ2 and EQ3) are still in effect. It should also be noted that the Draft New London Plan is also part of the Development Plan Documents (DPD) and contains proactive policies on climate change.</p> <p>LB Hounslow will begin work on a review of all adopted strategic policies, including those related to climate change mitigation and adaptation, in 2021. Please see the LDS for further details.</p>
The importance of the Creative Enterprise Zone requires further embedding within the Great West Corridor Local Plan to ensure that the creative enterprise sector is included in strategic decision making for the Corridor.	GWC Intro, Spatial Vision, Strategic Objectives; GWC1	GLA, West London Business	Comment noted, this has been included in employment growth policy GWC1 and has been emphasised more as part of minor modifications within the introduction, spatial vision and strategic objectives section of the Plan.
<b>Policy GWC 1 Employment Growth–</b>			
<b>Total number of responses: 27</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>

<p>What is the objectively-assessed need for additional employment floorspace? (i.e. is the plan over-delivering employment floorspace?)</p>	<p>GWC1</p>	<p>GLA</p>	<p>The Employment Land Review, as updated, states that there is a requirement for 183,000 sqm of additional industrial floorspace and 148,000 sqm of additional office floorspace (both figures including pipeline losses and planning permissions outstanding). These findings are not contingent on Heathrow expansion. The plan reviews would provide for 270,618 sqm of industrial floorspace and 87,521 sqm of office floorspace.</p>
<p>Is the plan in conformity with the London Plan in relation to employment policy, and in particular the loss of industrial floorspace and co-location of industrial with residential development?</p>	<p>GWC1</p>	<p>GLA</p>	<p>The plan reviews are in conformity with the key objectives in the New London Plan for industrial intensification. The plan review would require the protection of existing uses (Policy GWC1 j and k) and would deliver an additional 96,200 sqm of SIL-compliant floorspace. The co-location proposals are in conformity with Policy E7 of the New London Plan. They would require proposals for residential development on such sites to be in compliance with the Agent of Change principles in DNLP Policy E7.</p>
<p>Do the employment policies effectively encourage the intensification of existing employment land? (particularly in the context of the 65% plot ratio requirement by the DNLP)</p>	<p>GWC1</p>	<p>GLA</p>	<p>Intensification of employment land is one of the main objectives of the plan review, particularly in the Great West Corridor. Policy GWC1 commits the Council to supporting opportunities to intensify employment land. The place policies and site allocations provide guidance for the target level of employment floorspace for each site, seeking proposals on SILs and LSISs to intensify industrial uses where feasible and to protect existing uses. Individual development proposals will be expected to demonstrate how they meet these targets for additional industrial floorspace, as set out in part (k) of policy GWC1. Much of the industrial land in the GWC is already developed to a 65% plot ratio. The GWC Plan strategy will intensify the use of key sites further, by introducing new and</p>

			intensified uses where appropriate, as well as protecting existing uses.
Has the plan adequately scrutinised the capacity of existing employment sites to deliver additional floorspace?	GWC1	GLA	The Employment Land Review carried out site assessments of existing employment sites, and this was updated in 2020. It has robustly assessed the capacity of existing employment sites to deliver additional floorspace. The GWC Masterplan and Capacity Study and the West of Borough Capacity Study have also assessed the scope for intensification of existing employment areas, and have developed a masterplanning framework for recalibrating some of the key employment areas to deliver growth.
Has the plan adequately scrutinised the role of town centres in providing for additional office floorspace?	GWC1	GLA	The ELR has scrutinised the role of town centres in providing additional office floorspace. It has concluded that additional office floorspace is not currently viable in the borough's town centres. Over the past 10 years the Council has embarked on major town centre regeneration. Further regeneration activity may change this picture in the future, however any further major growth in town centre office uses would be unlikely to be deliverable in the plan period.
Does the plan effectively set out the mechanism through which it intends to deliver affordable workspace through the planning system?	GWC1	GLA	The plan review states in Policy GWC1 part (n) how major development proposals will be expected to incorporate an appropriate quantum of: affordable workspace offered at below market rate; shared workspaces; and/or small business units. The Council will provide further detail of how much affordable workspace should be provided and how this should be delivered in a forthcoming supplementary planning document.
Do the policies in the GWC effectively demonstrate how industrial intensification could be viably achieved, in the context that some of these typologies are relatively untested in the UK market?	GWC1	Developers	The place policies of the plan outline where employment intensification will be supported, such as in the GWC West area. It is acknowledged that some of the industrial intensification typologies are relatively untested in the UK market. However, the evidence base

			supporting the plan – particularly the GWC Masterplan – outlines potential models for achieving this, and the plan is underpinned by evidence on the viability of this approach.
Do the policies in the GWC effectively demonstrate how co-location could be achieved, and in particular have they shown that they could be delivered in accordance with agent of change principles?	GWC1	Developers (particularly SUEZ re. waste transfer station)	The masterplanning work and evidence underpinning the plan has outlined how co-location could be delivered in a way which is in accordance with Agent of Change principles. It would be for individual proposals to demonstrate compliance with this approach to be compliant with Policy GWC1 (b) and other policies in the plan. We have followed the Mayor's Industrial Intensification and Co-location Study (2018) which provides guidance on design and deliverability for this form of development, incorporating agent of change principles.
Are the site and place policies overly prescriptive and do they provide sufficient flexibility in terms of the mix of proposed uses?	GWC1	Developers	The site and place policies aim to provide direction in order to achieve the main objectives of the plan, such as housing and employment growth, whilst allowing for flexibility regarding mix of uses. The policy outlines minimum floorspace targets to cover overall industrial use, rather than this being divided between industrial use classes, to allow for greater flexibility.
<b>Policy GWC2 – Housing</b>			
<b>Total number of responses: 21</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
The Plans should make provision for specialist older persons housing which would make a contribution to specialist housing options in the borough	GWC2/WOB2	NHS Hounslow CCG Developers	Comments noted, policy GWC2 and WOB2 have been amended to clarify this position in order to ensure they support a range of housing options, including for older people.
The reviews should not compromise the commitments set out in the planning system to protect and enhance the natural environment, which is increasingly subject to adverse pressures within the	GWC2/WOB2	London Wildlife Trust	Comments noted. Detailed work has been done to ensure that any impacts from development upon biodiversity are avoided, mitigated, or as a last resort, compensated for. This is reflected in the site allocations.

borough and at a regional and national scale.			
The phasing of sites allocated for housing in the GWC should be made more in line with the Mayor's strategy to protect industrial sites.	Site Allocations Nos. 1-41	Mayor of London	<p>The Council has phased sites in the Great West Corridor following detailed discussions with landowners about when sites are expected to come forward, based on provision of strategic infrastructure and other relevant matters – such as findings from the Council's Employment Land Review.</p> <p>The council considers that, on sites where industrial intensification is being applied, sites are in line with the requirements of policy E7.</p>
Hounslow should include reference to supporting housing on small sites in the Great West Corridor in line with DLnP H2.	GWC2	Mayor of London	The council has conducted extensive engagement to identify land and engage with landowners in the Great West Corridor in order to achieve opportunity area growth target, and has allocated a range of mainly large sites in the GWC. The council considers it unlikely that any additional small sites will come forward within the GWC plan boundary over the plan period however in the unlikely event of this happening the Council has made minor amendments to the policy to include reference to supporting housing on small sites.
Confirmation that the threshold approach adopted is for 35% (or more) outlined on page 69 of the Mayors Affordable Housing and Viability SPG.	GWC2/WOB2	Developers	Comments noted. Our policies seek to ensure that the affordable housing threshold approach is in line with the emerging New London Plan.
GWC2 does to consider other residential products such as large-scale purpose-built shared living (i.e. co-living).	GWC2	Developers	Comments noted. GWC has been amended to account for the need to provide a range of accommodation types to meet need, including those of older people. We do not consider 'Co-living' schemes do not have a role in meeting our housing need, however this form of housing may be best achieved in our existing Town Centres – subject to appropriateness and detailed design considerations.
Flexibility should be provided	GWC2	Developers	Comments noted. Draft London

in the affordable housing tenure split in order ensure it complies with NPPF paragraph 122 and London Plan Policies 3.11 and 3.12			Plan Policy H6 sets out minimum proportions of affordable housing while instructing boroughs to set a portion of this based on local need. The SHMA (2018) indicates an acute need for additional low cost rented homes in the borough, which indicates that the council should seek to maximise delivery in this category. Therefore, the policy is considered justified.
The 50% Strategic Requirement for affordable housing is not supported by the Viability Assessment	GWC2	Developers	The Draft London Plan sets a strategic target for London of 50% of all new homes across London to be genuinely affordable. The council supports the Mayor in these aims and is seeking to support a significant increase in affordable housing. The Viability Assessment supports this approach.
Limited scope for residential development within the GWC owing to the environmental issues, which is liable to deteriorate further if transport improvements are not forthcoming. Policy GWC2 is therefore unsound.	GWC2	Residents Groups, Individuals	Comments noted. The plan seeks to ensure that where housing is delivered, this is located and designed to address environmental issues facing the Corridor. The requirements are set out in policy GWC3 Health and Wellbeing. Furthermore, housing schemes have been phased in line with anticipated infrastructure delivery as set out in the Infrastructure Delivery Plan (IDP).
GWC2 provides for 6,800 homes, a shortfall against the target of 7500. The phasing of development is not realistic given the slow implementation of existing, outstanding planning consents in the area over the last 10-15 year.	GWC2, Allocations	Resident Associations Developers	Comments noted. The target consists of development set out in the site allocations and development within the housing pipeline, therefore the Council will be able meet its OAN and in so doing achieve the indicative capacity for the Opportunity Area. While developing the plan, the Council has worked closely with developers to ensure allocations are phased realistically, and in line with the delivery of key infrastructure as set out in the IDP, to support scheme deliverability.
The plan does not contain positive proposals to growth identified in the SHMA 2018 for family sized dwellings.	GWC2	Community Groups	Comments noted. Policy GWC2 seeks to provide a range of accommodation types to meet local need, which reflects the conclusions of the SHMA 2018 which found that

			there was a need for a significant proportion of 3 bed or more units to be delivered (as set out in table 4 in the supporting policy text).
Support for the aim to provide 3,000 affordable homes in the GWC.	GWC2	Community Groups, Individuals	Support welcomed. The plan seeks to achieve the GLA Opportunity area figure of 7,500 homes, and in doing so supports meeting the significant need for homes in the borough, as set out in the SHMA (2018), and to provide a large proportion of these as low cost rented products, in line with the Draft London Plan policy H6 and local need.
Concerns regarding the ability of the plan to deliver affordable housing and help meet housing demand.	GWC2	Individuals	Comments noted. The Plan seeks to provide 50% of all units as affordable housing with a split between 70% low cost rented and 30% intermediate tenures, and seeks to maximise the delivery of housing in order to meet objectively assessed needs. The Plan also seeks to adopt the Mayor's fast track affordable housing threshold approach as set out in the Draft New London Plan.
<b>Policy GWC 3 Health and Wellbeing</b>			
<b>Total number of responses: 16</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
Residential accommodation and associated amenities should not be located in heavily polluted areas in GWC, especially in proximity to A4 / M4	GWC3	Community groups / Individuals	The Local Plan Review recognises the challenge of the severely constrained availability of sites in the East of the borough to accommodate much needed housing and employment floorspace. Policy GWC3 requires developers to implement a range of design mitigation measures to in order to mitigate impact and these measures are supported by the Air Quality & Noise study (2020).
Development growth must be supported by necessary community infrastructure, to be planned jointly with all relevant parties.	GWC3	Community groups / Individuals	The overall approach taken in the Plan is to ensure development is delivered to coincide with the delivery of supporting infrastructure. The Council has liaised with key partners to plan the provision of infrastructure to support growth. Policy GWC7 sets out how the Council will ensure the necessary supporting

			community/social infrastructure will be provided, as set out in the Infrastructure Delivery Plan (2020) which also provides detail on funding. Additional detail is also provided in the place policies.
The policy should aim to protect people and the environment by tackling land contamination and pollution. Developers should be required to; submit a Preliminary Risk Assessment (PRA) alongside any planning application where contaminated land is suspected	GWC3	Environment Agency	Comments noted, we have made minor modifications to policy GWC3 to clarify our position on this.
Health and Wellbeing Policy seeks to protect and enhance of facilities which aligns with Sport England's Planning Policy however it does not discuss new provision. The Council's Sport Facility Strategies should set out what needs to be protected, enhanced and provided.	GWC3	Sport England	Comments noted, minor wording amendments has been added to policies GWC 3 and GWC4 to clarify our position on new sports facilities provision.
<b>Policy GWC 4 Open Space and Green Infrastructure</b>			
<b>Total number of responses: 16</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
EA note lack of strategic policies around water quality and water resources, flood risk and waste. EA request these policies be introduced, or that policies cross refer to adopted LP2015 policies in these areas, to make the Plan sound and to ensure development needs can be met and the proposed growth: 1. does not adversely impact on the biodiversity and quality of the water environment 2. it is located in areas with the lower probability of flooding	GWC4	Environment Agency	The Local Plan Reviews have been in development since the adoption of the Local Plan 2015. It is important to note that the Plan reviews are both area-focused (i.e. partial) reviews seeking to guide development within 2 opportunity areas: the proposed Great West Corridor Opportunity Area and that part of the Heathrow Opportunity Area within Hounslow. As such, adopted strategic policies relating to water quality and resources (GB5, GB6, EQ8), flood risk (EQ3) and waste (EQ7) are still in effect in these areas. Additional signposting to these policies has been included as part of minor amendments to the submission version of both Plan Reviews.

			LB Hounslow will begin work on a review of all adopted strategic policies as part of the full Local Plan review in late 2021 once the Site Allocations, GWC and WOB Local Plan Reviews have been adopted. Please see the LDS for further details.
Draft policies would benefit from strengthened wording in respect of the contribution of trees to the urban environment	GWC4	Woodland Trust	Comment noted, policy wording related to trees has been amended as part of minor modifications to plan policy.
Waterbodies should be recognised in this section as open spaces in their own right. The policy should request development adjacent to rivers are required to make improvements to help achieve Water Framework Directive (WFD) objectives and increase biodiversity.	GWC4	Environment Agency	Comments noted, we have included additional wording through minor modifications to clarify our position with regards to the WFD.

<b>Policy GWC 5 Design and Heritage</b>			
<b>Total number of responses: 32</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
Consented/existing tall buildings should not be used as precedent where these cause harm to heritage assets. There is an assumption that harm to heritage assets is acceptable and inevitable.	GWC5	Richmond, Kew Gardens Historic England, Community Groups	The existing tall buildings along the Corridor have not been used as a precedent, rather these have been taken in to account within the modelling set out in the GWC Masterplan.
There is an assumption that harm to heritage assets is acceptable and inevitable.	GWC5	Richmond, Kew Gardens Historic England, Community Groups	Noted, we have amended the supporting text to ensure the intentions of the policy are clear.
Concerns over the methodology used to assess significance of heritage assets.	GWC5	LB Richmond, Starbones Ltd	An addendum has been added to the GWC Masterplan setting out in more detail the significance of heritage assets both within and surrounding the Corridor.
The wording of site specific allocation policies do not set out adequate criteria to guide development in a way that will be consistent with national policy.	GWC5	Historic England	LB Hounslow has amended the wording of the site allocations to clearly state that development proposals are expected to conserve and enhance any affected heritage assets and carry out Heritage

			Impact Assessments as part of development proposals.
The evidence, specifically site selection methodologies and the heights set out in the GWC Masterplan/Capacity study, is insufficient in scope and detail.	Masterplan	Historic England, Kew Gardens	The site selection methodology is set out in the Site Allocations and Capacity Assessment 2019. LB Hounslow considers that this has been undertaken to a sufficiently high level of rigour in line with existing guidance.
Heritage impact assessments should have been carried out in advance of site allocations being made.	GWC5	Historic England, Community groups (Kew Society)	LB Hounslow has undertaken extensive modelling to assess the impact of the proposed heights on heritage assets. On the basis of comments received during the consultation, an addendum has been added to the GWC Masterplan outlining the significance of heritage assets in the Corridor and how our approach is consistent with guidance.
Height parameters are overly prescriptive. These should be illustrative to allow for a consideration of all material considerations at planning stage. The prescriptive heights are flawed because the evidence base and methodology used underpin these policies is not credible or robust.	GWC P3	Developers (Starbones Ltd, La Salle Investments, Ecoworld 2, Gillette Corner Holdings, L&Q, Tiger Developments, A2 Dominion)	The extensive modelling undertaken as part of the GWC Masterplan process demonstrates the heights we consider to be appropriate given heritage and other constraints. LB Hounslow consider that the evidence base and methodology used is both credible and robust, having been informed by relevant policy and guidance. Should a developer wish to exceed the stated height parameters as part of any future proposals they will need to justify this through supporting evidence.
Stating that schemes should avoid further harm to Kew does not accord with national policy as it fails to distinguish substantial and less than substantial harm and ignores the balancing test required of decision makers.	GWC5	Developers (L&Q, Starbones)	LB Hounslow have added the balancing test required by the NPPF into our policy. Stating that development should avoid harm does not negate the need for the decision maker to carry out the balancing test, however in the case of Kew the NPPF does state that harm to world heritage sites should be "wholly exceptional".
The assumption that harm equates to visibility is incorrect and is not supported by national planning policy. The policy does not accord with the draft London Plan policy as it is overly focused on visibility.	GWC5	Developers (L&Q, Berkley St Edwards, Starbones)	The GWC Masterplan has been amended to give further information on the significance of heritage assets both within and surrounding the Corridor and why they are sensitive to tall buildings.

Archaeology is under represented in the site allocations and in the plan.	GWC5	Historic England	LB Hounslow have added the requirement for a desk based assessment to be undertaken as part of any proposal on an allocated site which falls within an archaeological priority area.
<b>Policy GWC 6 Connecting People and Places–</b>			
<b>Total number of responses: 24</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
The timescales set out for delivering some of the rail-based infrastructure improvements are vague, the projects are at a very early stage, and funding is not at present fully secured.	GWC6	Developer	The Council has worked with TfL to produce an extensive Strategic Transport Study (STS) to support the draft submission version of the Plan. This has been prepared to address existing and projected future transport network capacity issues and proposes a comprehensive programme of recommended enhancements that will ensure that the transportation network can handle the additional capacity needed as development comes forward. Development phasing has been considered in the draft submission version of the Plan to ensure that development is delivered to coincide with improvements to public transport accessibility, as set out in the STS. The Council has assessed the deliverability of the Brentford-Southall Crossrail link and the West London Orbital link and considers them deliverable within the plan period. Funding for strategic transportation projects is a priority for the Council and funding mechanisms will be formalised as the projects progress. More details of this can be found in the IDP.
Bus-based improvements could be delivered earlier than the rail infrastructure. Bus services along GWR should be improved in terms of frequency, bus lanes and electronic screens	GWC6	TfL, Developers, community Groups, Individuals	Bus-based mitigation measures, and likely a Bus Rapid Transit system planned by TfL will be delivered in the interim period between the delivery of the railway improvements. The Council has been working with TfL to determine the feasibility of improved bus transport options along the A4 and policy GWC6 sets out how the Council will work with developers, partners and stakeholders to deliver

			a package of transport measures.
There is a significant funding gap in relation to the Southall Crossrail link. The Southall Rail link should be funded by CIL funds.	GWC6	Developers	Several funding sources have been secured for the Southall link, for example developer contributions, but work continues on identifying other sources of capital and revenue funding. One option being considered is a Workplace Parking Levy in the area surrounding the new station at Transport Avenue and a business case is currently being prepared for this proposal. CIL payments will likely be one of the sources of funding, however not the only one. Please refer to the Infrastructure Delivery Plan.
The proposed Lionel Road station should not undermine the commercial viability of the site in question, more information on the extent of land required is needed.	GWC6	Developer	The Council is currently undertaking a study in cooperation with TfL to determine the extent of land required to deliver Lionel Road station and these will be made available to landowners/developers.
No transport alternatives presented if the WLO cannot be delivered.	GWC6	Developers	WLO is included in Mayor's Transport Strategy and draft New London Plan, therefore it is one of the priority projects, and the likelihood of delivery is high. The STS also presents a number of other public and active transport measures which have been taken forward in plan policy GWC6 and the IDP.
The proposed Southall Rail Link should be turned into a tramway service.	GWC6	Individual	The costs of such infrastructure would be disproportionately high, as new tramway tracks and a depot would need to be constructed, while the proposed rail link would utilise currently operational rail tracks
More towpath improvements are needed, including crossings.	GWC6	Individual	Agreed, the Plan includes several improvements to towpaths along River Brent/Grand Union Canal, alongside new crossings.
Public transport improvements need to be provided prior to developments being occupied.	GWC6	Individuals, community groups (WCGS, BCC)	The Council has worked with TfL to produce an extensive Strategic Transport Study (STS) to support the draft submission version of the Plan. This has been prepared to address existing and projected future transport network capacity issues and proposes a comprehensive programme of

			recommended enhancements that will ensure that the transportation network can handle the additional capacity needed as development comes forward. Development phasing has been considered in the draft submission version of the Plan to ensure that development is delivered to coincide with improvements to public transport accessibility, as set out in the STS.
N-S walking and cycle links should be prioritised.	GWC6	Community Group	The Council is working with TfL to carry out improvements to the walking and cycling facilities along the A4 and north-south roads, and to improve pedestrian and cycle crossings on the A4 to improve permeability of the area.
The impact of the development proposal upon traffic growth has not been fully evaluated, especially in absence of confirmed plans for the public transport facilities	GWC6	Highways England, Community Group	Comments noted. The Council has undertaken an extensive Strategic Transport Study to ensure that the transportation network can handle the additional capacity that is needed as development comes forward.
It is likely that development at Heathrow and to the west of London will generate additional through traffic.	GWC6	Community Group	Comment noted, however as Heathrow expansion proposal become clearer, Heathrow will need to undertake a transport impact assessment and work with surrounding boroughs, TfL and relevant highway authorities to mitigate any impact generated.
The introduction of the ULEZ up to the North Circular Road will have impact upon traffic and this has not been evaluated	GWC6	Community Group	TfL considers that analysis of their transport modelling does not lead them to expect significant impacts at the boundary of the ULEZ in this area, however they will be monitoring the situation closely and will introduce mitigations or changes as necessary.
Consideration needs to be given to decreased capacity on Piccadilly line after the Heathrow expansion	GWC6	Community Group	Comment noted, however the Council considers that once the situation around the Heathrow expansion project becomes clearer, Heathrow Airports Ltd will need to undertake a transport impact assessment and work with surrounding boroughs, TfL and relevant highway authorities to mitigate any impact generated. Consideration also needs to be

			given to other transport improvements in the area including proposed Southern Rail Access and Elizabeth Line that will decrease the burden on Piccadilly line.
Lower than maximum parking provision in GWC West and Central and car free development in GWC East are supported.	GWC6	Statutory Consultee (TfL)	Comment noted.
<b>GWC Place Policies (GWC P1, P2 and P3)</b>			
<b>Total number of responses: 41</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
The Place Policies P1, P2 and P3, should be amended to ensure that flood risk, water quality and water resources, sustainable infrastructure and waste or contaminated land are taken into consideration when development is proposed within the Great West Corridor - including clear statement that these policies be read in conjunction with strategic policies set out in LP2015.	All GWC place policies	Environment Agency	Strategic policies relating to flood risk, water quality and water resources, sustainable infrastructure, waste and contaminated land are set out in the Green and Blue Infrastructure (GB5) and Environmental Quality (policies EQ1-EQ10 inclusive) chapters of the adopted Local Plan 2015. LB Hounslow will begin work on a review of all adopted strategic policies as part of the full Local Plan review in 2021 once the Site Allocations, GWC and WOB Local Plan Reviews have been adopted. Please see the LDS for further details.
The setting of building heights in the policy is over-prescriptive.	GWC P1 West	Developers	Comment noted. As required by draft New London Plan policy relating to tall buildings, the building heights framework has been developed to guide the appropriate heights of new development in these areas and this is supported by views testing.
Policy as currently drafted is considered to not be consistent with national policy regarding safeguarding of minerals infrastructure, and railheads or provide adequate protection for the industrial uses within it.	GWC P1 West	Developers	Comments noted. The draft policy text has been amended to reflect the status of the location as a protected railhead. However, it is considered that the policy as worded and in combination with the site allocations, provides an adequate level of protection through the Agent of Change principle to protect the function of Transport Avenue.
Proposals for Tall buildings in the corridor adjacent to listed	GWC P1 GWC West	Community Groups	Comments noted. The Masterplan has provided heritage assessment

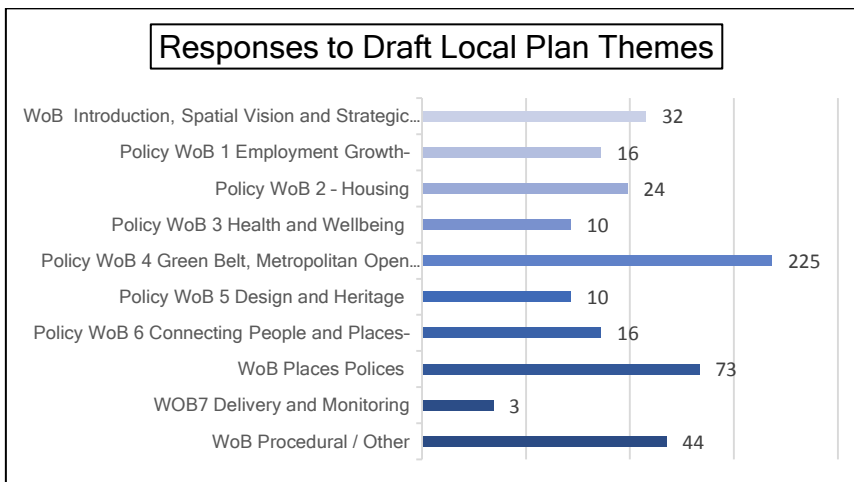
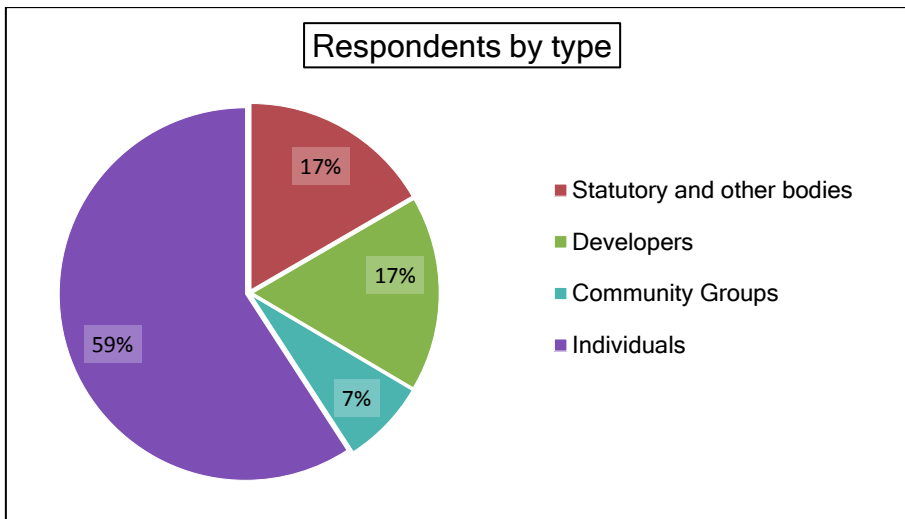
buildings would be out of character with the area and cause harm to these assets, and does not require the scale and design of buildings close to these heritage assets to be lower and subservient to them.			and extensive views testing which demonstrates that buildings of these heights can be accommodated without significant harm to heritage assets, including how additional capacity can be accommodated while conserving and enhancing listed buildings. The Plan seeks to optimise development on brownfield land in line with the requirements of the NPPF and Draft London Plan while ensuring heritage assets are conserved and enhanced.
There is no mention of health infrastructure requirements in the Great West Corridor Central area. The impact of 1,230 new homes is likely to require additional primary care capacity in this area, which could be accommodated at Brentford Health Centre.	GWC P2 Central Corridor	Hounslow CCG	LB Hounslow consider that this has been factored in sufficiently, but we have amended GWC Place policies to explicitly refer to proposed local health infrastructure projects identified in the IDP to meet rising demand following engagement with the London Healthy Urban Development Unit (on behalf of Hounslow CCG).
Objection to the inclusion of certain 'historic' streets (including Orchard Road, Glenhurst Road and York Road) within the GWC OA boundary given concerns around development pressure and adverse impact upon character/context.	GWC P2 Central Corridor	Community groups / individuals	There are no sites allocated for development on any of the streets alluded to here. The area around Orchard Road, Glenhurst Road and York Road are included within the opportunity area boundary in order to show the improved connectivity proposed for the area, including pedestrian connections to Brentford station. Proposals coming forward in the area must fully consider any impact to the character and appearance of the area as per adopted development management policies.
Site allocations in the GWC Central area should be less proscriptive in terms of the minimum quantum of non-residential floorspace requirements in order to ensure sites can be delivered	GWC P2 Central Corridor	Developers	The site allocations are based on minimum quantum for residential units and non-residential floorspace. This does not prevent applicants from proposing higher quantum, subject to detail design and impact assessment at application stage.
<b>Policy GWC 7 Delivery and Monitoring</b>			
<b>Total number of responses: 9</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
GWC Plan does not effectively join up development sites	GWC7	Community Groups /	The Plan Review seeks to find a way to accommodate housing need by

within the plan area and does not effectively co-ordinate proposed growth and the delivery of required infrastructure.		Individuals	securing a plan-led approach which ensures that the appropriate physical, transport and social infrastructure investment is made to unlock these sites, thereby providing adequate services for new and existing communities along the GWC. Development has been phased to account for anticipated infrastructure delivery through the site allocations and this is reflected in the Delivery and Monitoring Matrix (see GWC Plan chapter 6, policy GWC7 supporting text). The Plan should be read in conjunction with the Infrastructure Delivery Plan (IDP) and Site Allocations (Vol.2).
Policy should be amended to include a mechanism for early Plan review should housing delivery / growth not be achieved (as indicated through monitoring).	GWC7	Developers / Community Groups	Both the Planning regulations (Regulation 10 A of the TCP(LP) 2012 Act) and the NPPF (paragraph 33) require Local Planning Authorities to review Local Plans at least once every 5 years. Furthermore, the NPPF states that strategic policies are likely to require earlier review if local housing need is expected to change significantly in the near future. Details of LB Hounslow's local plan review schedule can be found in the updated Local Development Schedule. This currently commits the Council to commence a full review of all strategic policies contained in the adopted Local Plan 2015 following the adoption of the Site Allocations, GWC and WoB Local Plan Reviews. LB Hounslow will continue to monitor the performance of its housing policies against housing delivery as part of its annual monitoring programme and this will inform future policy development to be taken forward through regular Plan reviews.
<b>GWC Procedural / Other</b>			
<b>Total number of responses: 39</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
Highways England raise concerns around likely impact of the level of growth	GWC P1	Highways England	The Council has undertaken a Strategic Transport Study to ensure that the transportation network can

<p>proposed through the LPRs upon the safety, reliability and/ or operation of the Strategic Road Network, specifically the M4 Junction 1, 2, 3. Highways England request further engagement.</p>			<p>handle the additional capacity that is needed as development comes forward. LB Hounslow have met with officers from Highways England to discuss the potential impact of anticipated growth upon the SRN. Additional evidence has been commissioned and a statement of common ground is being entered into.</p>
---	--	--	---

## Regulation 19 Pre-Submission Draft WoB Local Plan review

6.17 In total, 299 representations made pursuant to Regulation 20 were received relating to the Pre-Submission Draft WoB Local Plan review, generating 453 summarised responses. The tables below break down these responses by respondent type and policy / theme area.



**Table 3.10: Summary of Regulation 20 responses to the Regulation 19 Pre-Submission Draft WoB Local Plan review:**

<b>WoB Introduction, Spatial Vision and Strategic Objectives–</b>			
<b>Total number of responses: 32</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
Should the plan be seeking to meet the need for housing and employment assuming Heathrow expansion goes ahead, or should it merely seek to meet development requirements under the status quo?	WoB Spatial Vision and Strategic Objectives	CPRE	The plan review seeks to meet the needs identified as being needed now, and its strategy is not dependent upon Heathrow expansion. It is clear from the evidence that additional land will be required to support and capture the benefits of Heathrow’s growth, whether expansion takes place or not. However, the Council also believes that it is prudent to plan with the contingency of Heathrow expansion in mind, and is therefore including flexibility for the plan to be able to meet need generated through an expanded Heathrow, for example Heathrow Gateway which is safeguarded to be released should strategic transport infrastructure be provided to meet both existing office floorspace need as well as any additional need that may be required.
What is the boundary of the Heathrow Opportunity Area, and is it necessary to define the split in development requirements between Hounslow and Hillingdon?	WoB Spatial Vision and Strategic Objectives	GLA	The boundary of the Heathrow Opportunity Area has not been defined in the London Plan, however the Council considers the WoB Plan boundary to reflect the OA boundary within Hounslow borough. Whilst it is acknowledged that the indicative homes and jobs targets for the Heathrow OA cover Hounslow and Hillingdon, the WoB Plan is providing for a quantum of development which has been identified in the evidence base as being required to meet our borough-wide OAN, and through this specify what quantum of the indicative capacities Hounslow could meet within its part of the OA.
LB Hillingdon do not believe the 4 issues raised in their representation (interaction of	WoB Spatial Vision and Strategic	LB Hillingdon	LB Hillingdon and LB Hounslow have met throughout the preparation of the WoB Local Plan

<p>WoB Plan with Heathrow expansion proposals; proposed loss of greenbelt; the Heathrow Opportunity area indicative capacities for homes/jobs and delivery issues relating to 2 key strategic sites; and Highways impacts) can be dealt with through modifications as these relate to overall growth strategy. Specific concern raised around Hounslow not being able to contribute sufficiently to the indicative capacity targets or the Heathrow OA and consequently not meet its own needs.</p>	<p>Objectives</p>		<p>review to discuss cross boundary matters as per the duty to cooperate and to attempt to overcome any issues arising from these discussions. Both parties have met to discuss the issues raised in LB Hillingdon's Regulation 19 representation and this work is set out in a statement of common ground to be entered into by both parties.</p>
<p>The Plan is not sound as it does not identify sufficient housing capacity to meet OAN. The Plan should therefore include additional site allocations for housing, specifically smaller sites currently within the Metropolitan Green Belt.</p>	<p>WoB Spatial Vision and Strategic Objectives</p>	<p>Developers</p>	<p>The council has fully explored the potential of brownfield sites in the borough to deliver objectively assessed needs, and has identified a limited number green belt sites as being suitable to meet our existing objectively assessed need for housing. This is set out in the Site Allocations and Capacity Assessment (SACA)(2020).</p>
<p>The Mayor questions the need for the proposed quantum of growth set out in Hounslow's employment evidence. Any growth resulting from the proposed expansion of Heathrow airport should be planned for on a regional basis based on capacity and infrastructure.</p>	<p>WoB Spatial Vision and Strategic Objectives, Evidence base</p>	<p>GLA</p>	<p>The quantum of growth for additional employment floorspace has been identified in the evidence base as being required to meet our borough-wide OAN without Heathrow expansion.</p>
<p>The WoB Plan does not adequately address issues relating to climate change and is not in line with LBH's declaration of a 'climate emergency'. Specific concern raised in relation to the cumulative impact of loss/degrading of designated open space.</p>	<p>GWC Spatial Vision and Strategic Objectives, GWC3, GWC4</p>	<p>Community groups / individuals</p>	<p>LB Hounslow declared a climate emergency on 23<sup>rd</sup> July 2019 and has been developing a Climate Change Action Plan to set out how the Council intends to address the climate crisis. The Local Plan Reviews have been developed following the adoption of the Local Plan 2015 and are now at an advanced stage. It is important to note that the GWC and WoB Plan reviews are both area-focused reviews seeking to guide development within 2 opportunity areas: the proposed Great West</p>

			<p>Corridor Opportunity Area and part of the Heathrow Opportunity Area within Hounslow. As such, adopted strategic policies relating to climate mitigation and adaptation within the Local Plan 2015 (policies EQ1, EQ2 and EQ3) are still in effect. It should also be noted that the Draft New London Plan is also part of the Development Plan Documents (DPD) and contains proactive policies on climate change.</p> <p>LB Hounslow will begin work on a review of all adopted strategic policies, including those related to climate change mitigation and adaptation, in 2021. Please see the LDS for further details.</p> <p>The impact of the loss/degrading of open space upon climate change mitigation and adaptation has been assessed through the IIA (Sustainability Appraisal). The IIA findings suggest that whilst the loss of existing open land to development has the potential to reduce at some locations the capacity of the landscape to either act as a carbon sink or adapt to climate change, the implementation of the recommendations of the Green Belt Review offers significant opportunities for green infrastructure enhancements which could increase the ability of the landscape/townscape to act as a carbon sink and increase climate change resilience. Plan policy proposes various green infrastructure enhancements within the WoB area and measures like the Urban Greening Factor (WoB4 (i)) will further aid the ability of new developments to help mitigate and adapt to changing change.</p>
<b>Policy WoB 1 Employment Growth–</b>			
<b>Total number of responses: 16</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
What is the objectively-	WoB1	GLA	The Employment Land Review, as

<p>assessed need for additional employment floorspace? (i.e. is the plan over-delivering employment floorspace?)</p>			<p>updated, states that there is a requirement for 182,770 sqm of additional industrial floorspace and 148,241 sqm of additional office floorspace (both figures including pipeline losses and planning permissions outstanding). These findings are not contingent on Heathrow expansion. The plan reviews would provide for 270,618 sqm of industrial floorspace and 87,521 sqm of office floorspace in order to meet our objectively assessed need for employment, in a way that also meets the qualitative requirements for different typologies of floorspace in different parts of the borough, and to provide a long-term provision of industrial land.</p>
<p>Is the plan in conformity with the London Plan in relation to employment policy, and in particular the loss of industrial floorspace and co-location of industrial with residential development?</p>	<p>WoB1</p>	<p>GLA</p>	<p>The plan reviews are in conformity with the key objectives in the New London Plan for industrial intensification. The plan reviews would require protection of existing uses and intensification of industrial uses on designated key sites where feasible (Policy WoB1 (I) and (j) and would deliver an additional 229,100 sqm of SIL-compliant floorspace. The co-location proposals are in conformity with Policy E7 of the Draft New London Plan. Policy requires compliance with Agent of Change principles.</p>
<p>Do the employment policies effectively encourage the intensification of existing employment land? (particularly in the context of the 65% plot ratio requirement from the NLP)</p>	<p>WoB1</p>	<p>GLA, CPRE</p>	<p>Intensification of employment land is one of the main objectives of the plan review. WOB 1 policies were amended for clarity and consistency in light of the London Plan Intend to Publish document. It should be noted that the 65% plot ratio requirement has been directed to be deleted from the plan by the Secretary of State on 13th March 2020. In the WoB, many of the businesses require significant portions of yardage space for vehicle deliveries and access; it is not clear how this would be counted in calculating plot ratio. Notwithstanding that, Policy</p>

			WoB1(Employment) requires development proposals to protect existing uses and where feasible, to intensify industrial uses on existing designated sites.
Has the plan adequately scrutinised the capacity of existing employment sites to deliver additional floorspace?	WoB1	GLA, CPRE	The Employment Land Review carried out site assessments of existing employment sites, and this was updated in 2020. It has robustly assessed the capacity of existing employment sites to deliver additional floorspace. The GWC Masterplan and Capacity Study and the West of Borough Capacity Study have also assessed the scope for intensification of existing employment areas, and have developed a masterplanning framework for recalibrating some of the key employment areas to deliver growth.
Does the plan effectively set out the mechanism through which it intends to deliver affordable workspace through the planning system?	WoB1	GLA	The plan review states in Policy WoB1 part (e) that major developments will be expected to provide new affordable workspace as part of their schemes. The Council will provide further detail of how much affordable workspace should be provided and how this should be delivered in a forthcoming supplementary planning document.
<b>Policy WoB 2 – Housing</b>			
<b>Total number of responses: 24</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
Note the challenging housing target for Hounslow and support appropriate measures to maximise housing delivery within the Borough boundary in the first instance and in the Greater London area.	GWC2/WOB2	Spelthorne BC	Support noted. The council has sought to identify and maximise development capacity with the objective of meeting our objectively assessed need for housing of 1,911 homes per annum.
The Plan should make provision for specialist older persons housing which makes a contribution to housing options for older people	GWC2/WOB2	NHS Hounslow CCG	Comments noted, policy GWC2 and WOB2 have been amended to ensure they support a range of housing options including those for older people.
The reviews should not compromise the commitments set out in the planning system to protect and enhance the	GWC2/WOB2	London Wildlife Trust	Comments noted. The Council has developed a Plan which aims to meet our OAN for housing whilst protecting and enhancing

natural environment, which is increasingly subject to adverse pressures within the borough and at a regional and national scale.			biodiversity. The site allocations ensure that any impacts on biodiversity should be avoided, mitigated, or as a last resort, compensated for.
The GLA SHLAA 2017 identifies capacity for 11,600 homes on large sites within the Opportunity Area between 2017-2041 without loss of Green Belt or Strategic Industrial Locations.	WOB2, Evidence Base	GLA	The Council has assessed all sites identified as suitable for development in the GLA SHLAA 2017 within the plan period through the SACA (2020) utilising the Housing and Employment Land Availability Assessment in National Planning Practice Guidance. This demonstrates that a number of sites within the West of Borough, (part of Heathrow OA) are no longer able to support growth, representing 4,966 units. The majority of these sites have gained planning permission and are included in the housing pipeline. However, a lack of sufficient sites to meet the London Plan Target therefore necessitate the consideration of additional capacity sites, including those in the Green Belt and how constraints can be overcome, in order to achieve the target.
The Council should consider how it can intensify existing Gypsy, Traveller and Travelling Showpeople Sites that are closer to amenities	WOB2, Allocations 78, 79	GLA	Hounslow has a single existing Traveller Site at the Hartlands, which is proposed for expansion. The Council has three existing Travelling Showpeople sites. Two of these sites, in Feltham Town Centre are constrained in terms of their ability to intensify, but a third site in the Green Belt (Baber Bridge) has capacity to be intensified and has been allocated in the plan for this purpose.
In order to reach their housing target, we consider the Council must look to release Green Belt / MOL land, in addition to Brownfield Land, as brownfield alone will not be sufficient to fulfil their challenging housing requirement.	WOB2	Developers	Comments noted. The Council has fully explored the potential of brownfield sites in the borough, and has identified a limited number green belt sites as being suitable to support additional development in order to deliver the draft New London Plan target and our objectively assessed need for housing.
Confirmation that the threshold approach adopted is	GWC2/WOB2	Developers	Comments noted. Draft London Plan H5 sets out the circumstances

for 35% (or more) outlined on page 69 of the Mayors Affordable Housing and Viability SPG.			under which the approach should be implemented, including the potential review and revision of the threshold at a future date. In order to avoid unnecessary repetition of the policy and conflict with any amended threshold, the local plan reviews defers to policy H5.
The requirement that “homes delivered are marketed to and occupied by people who live and work in Hounslow and London” has not been justified, is not in accordance with regional and national policy and is not an effective policy with respect to the tests of soundness.	WOB2	Developers	Comments noted. The policy does not explicitly require that homes are marketed to and occupied by people who live and work in London, but instead states that the council will seek to work with developers to ensure this wherever possible. The NPPF is clear that plans should seek to meet the objectively assessed needs of their area for housing, which are principally people who either live and work in the borough, or seek to do so.
The policy is not positive and should be rewritten to reference existing and planned levels of accessibility instead of limiting development to highly accessible locations.	WOB2	Developers	Comments noted. WOB2 has been amended to clarify that existing and planned levels of accessibility should be taken into account.
Support for minimum housing numbers in the place policies and site allocations with a range of housing tenures, types and sizes. However this should be altered to aim to maximise the housing density in the most sustainable locations.	WOB2	Developers	Comments noted. The policy sets a minimum housing number but is positively worded in that it ensures that it will seek to optimise housing delivery on sites as they come forward for development.
Unclear how the 10,300 target was arrived at in the West of Borough.	WOB2	Developers.	Comments noted. The figure is derived from total units on sites allocated in the West of Borough, which seeks to support meeting the London Plan Opportunity Area target of 11,000 homes (shared with LB Hillingdon) and supports meeting the borough’s OAN over the plan period. Please refer to the SACA (2020) and latest housing trajectory therein.
LB Hounslow has defined the boundaries of the OA within its administrative area and intends to deliver 11,000 homes. However, Draft Policy WOB2 plans for 10,300 and therefore	WOB2	A2Dominion	Comments noted. The OA as set out in the emerging New London Plan provides indicative capacities for homes and jobs, rather than targets. The Council, in accordance with the NPPF, has identified

falls below this in any event. It is also yet untested as to whether Hillingdon can meet the remaining 2,000 unit provision of the Draft London Plan 13,000 target for the OA. There may be an unmet need that will need to be addressed by Hounslow and in the West of Borough.			sufficient sites to meet our OAN for housing. In doing so we will meet the emerging New London Plan target for homes.
The plan should consider an approach of reducing housing growth as opposed to releasing Green Belt to accommodate this need, as this is a more sustainable approach.	WOB2	Residents Associations and Groups	Comments noted. The NPPF states that green belt should only be released in exceptional circumstances where the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. The Site Allocations and Capacity Assessment (2020) identifies that there is insufficient brownfield land within the borough to meet OAN for Housing, and so, following the results of the Green Belt review, a small number of parcels were assessed as being suitable for release to meet needs over the plan period.

**Policy WoB 3 Health and Wellbeing**

**Total number of responses: 10**

<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
Concerns that Hounslow did not place 'climate change' foremost in its management of local affairs	WoB3	Individual and Community Group	Comment noted, minor modifications have been made to WoB3 policy to place more emphasis on climate change.
The policy should aim to protect people and the environment by tackling land contamination and pollution. Developers should be required to; submit a Preliminary Risk Assessment (PRA) alongside any planning application where contaminated land is suspected	WoB3	Environment Agency	Comments noted. The Council has made minor modifications to policy WOB3 to clarify the position on this.
Health and Wellbeing Policy seeks to protect and enhance of facilities which aligns with Sport England's Planning Policy however it does not discuss new provision. The Council's	WoB3	Sport England	Comments noted, minor modifications have been made to policy WoB4 to clarify the position on new sports facilities provision.

Sport Facility Strategies should set out what needs to be protected, enhanced and provided.			
Concerns that the Council's view of open spaces appears to emphasise formality and organisation e.g. "open spaces (including playing pitches, and children's play spaces) This type of open space has its place within a diverse network of open spaces which include spaces left in their state of nature but managed to encourage access and biodiversity can promote a heightened sense of well-being among adults, achieve high levels of engagement among children, rehabilitate the lonely and mentally ill and provide educational resources to teachers.	WoB3	FORCE	Comments noted, the Council considers that open space stated in the policies also refer to these types of open spaces (such as semi-natural spaces).
<b>Policy WoB 4 Green Belt, Metropolitan Open Land and Open Space–</b>			
<b>Total number of responses: 225</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
EA note lack of strategic policies around water quality and water resources, flood risk and waste. EA request these policies be introduced, or that policies cross refer to adopted LP2015 policies in these areas, to make the Plan sound and to ensure development needs can be met and the proposed growth: 1. does not adversely impact on the biodiversity and quality of the water environment 2. it is located in areas with the lower probability of flooding	WoB4	Environment Agency	The Local Plan Reviews have been in development since the adoption of the Local Plan 2015. It is important to note that the Plan reviews are area-focused reviews seeking to guide development within 2 opportunity areas: the proposed Great West Corridor Opportunity Area and that part of the Heathrow Opportunity Area within Hounslow. As such, adopted strategic policies relating to water quality and resources (GB5, GB6, EQ8), flood risk (EQ3) and waste (EQ7) are still in effect in these areas.  LB Hounslow will begin work on a review of all adopted strategic policies as part of the full Local Plan review in late 2020 once the Site Allocations, GWC and WOB Local Plan Reviews have been adopted. Please see the LDS (July 2019) for further details.

<p>Is the plan in conformity with the London Plan in relation to the Green Belt? Is the policy in accordance with national policy?</p>	<p>WoB4</p>	<p>GLA, CPRE</p>	<p>The approach in Policy WoB4 is to protect the Green Belt from inappropriate development except in very special circumstances, in line with the approach in the DNLP Policy G2. The proposed releases of Green Belt in the plan is in accordance with paragraph 137 of the NPPF which allows for authorities to make Green Belt changes where exceptional circumstances have been demonstrated. The GLA has acknowledged during the course of the examination into the DNLP that boroughs are able to take this course of action, and the panel report into the DNLP states at para 457 that a review of the Green Belt in London should be undertaken to establish any potential for sustainable development, and para 458 states that the statement in the DNLP that de-designation of Green Belt will not be supported "ignores the NPPF reference to altering boundaries in exceptional circumstances through the preparation or review of local plans." In Hounslow's case, the Council has examined all other reasonable options for accommodating development requirements, and has found that all are insufficient to meet these requirements in full. It has therefore carried out a study to assess the performance of the Green Belt in the borough, to scrutinise any developable options for sustainable development and to assess whether these would bring benefits sufficient as to amount to exceptional circumstances for release. This is an objective, sound approach which the Council believes is in accordance with national policy.</p> <p>Minor amendments are proposed to policy WoB4 to clarify the position regarding NPPF para 138 and accompanying planning practice guidance, in relation to</p>
--	-------------	------------------	---

			compensatory improvements to the Green Belt.
Have exceptional circumstances justifying Green Belt release been adequately demonstrated? Does the exceptional circumstances argument take account of further loss of Green belt as part of the Heathrow Expansion project?	WoB4	GLA, CPRE, Hillingdon, community groups, individuals	The Council believes that exceptional circumstances have been robustly demonstrated to justify the selective Green Belt releases the WoB plan is taking forward. The exceptional circumstances are the inability to meet our development requirements without selective releases of Green Belt land, and, in the case of employment development, the need for these releases to be in proximity to Heathrow Airport to meet the need for industrial floorspace for businesses requiring close proximity to the airport and/or strategic road network. At a site level, individual parcels have been assessed for their Green Belt performance, whether they offer opportunities for developable and sustainable development, and whether this constitutes a benefit in comparison with the harm to the Green Belt, sufficient to amount to exceptional circumstances. As part of the Green Belt Assessment, an assessment was made of the wider importance of the Green Belt parcels to the strategic functioning of the Green Belt (step 4b of the Stage 2 assessment). The Council acknowledges that any future Heathrow expansion project may have major impacts on the Green Belt and its future role. However, at the current time, the exact form and timing of the proposal is unknown, and its wider strategic impacts will be considered through other processes such as the development consent order and the Heathrow Strategic Planning Group. The current Green Belt review being taken forward in the WoB Plan is critical in allowing the borough to meet its development requirements, and the Council considers that exceptional circumstances are demonstrated

			for the Green Belt changes irrespective of whether Heathrow Expansion proceeds or not.
Is the methodology underpinning the Green Belt assessment and the demonstration of exceptional circumstances sound? (e.g. in relation to size of parcels assessed, consistency of approach)	WoB4, evidence base	GLA, CPRE, various developer reps	The Council believes the methodology underpinning the Green Belt Assessment and Exceptional Circumstances Assessment is robust and sound, and follows a similar approach to a number of other such exercises which have been undertaken around the country and been found sound by inspectors. The size of parcels assessed has followed an objective and sound pattern, defined predominantly by key natural and man-made features in the landscape. A consistent approach to the scoring of the parcels was taken by the consultants and subsequently by the Council in assessing the parcels for their potential role.
Has the Plan fully considered alternatives to allocating Green Belt land for development?	WoB4, IIA	CPRE, Individuals	The plan has fully considered alternatives to allocating Green Belt land for development, including higher density development in existing built-up areas, exporting development requirements through the duty to cooperate and not meeting all of the borough's development requirements. The Council has concluded that none of these alternative options would constitute a sustainable approach.
Has the Plan fully considered sustainable development in terms of the impact of the damage to Green Belt against any potential gain from release to development land?	WoB4	CPRE, Individuals	Yes. An assessment of the sustainability of alternative options – both strategically and at a site level – has been one of the key elements of the Green Belt and Exceptional Circumstances assessment. The Sustainability Appraisal (IIA) has also been carried out in parallel, to provide an assessment of the key environmental (as well as social and economic) impacts of the policies and proposals. The Council has concluded that the selective releases of land proposed in the WoB constitute a sustainable option for meeting the development requirements of the

			<p>borough. The policies contain development requirements outlining how key constraints, such as biodiversity assets, are expected to be protected, mitigated and enhanced where development takes place. Amendments to the policy also set out how the Council will seek compensatory improvements to the Green Belt where development takes place on land released from the Green Belt. This will improve the quality and accessibility of land remaining within the Green Belt.</p>
<p>Is there a need to remove any further sites from the Green Belt to meet development requirements?</p>	<p>WoB4</p>	<p>Developers</p>	<p>As part of the Green Belt and Exceptional Circumstances assessment, the Council has concluded that any further releases of Green Belt over that proposed in the WoB Plan would tip the balance in terms of its harm to the Green Belt outweighing any benefits such releases might bring. Given that the releases proposed in the WoB Plan will allow the Council to meet the borough's development requirements, it does not believe there is a need at the present time to remove any further sites from the Green Belt.</p>
<p>Is the approach to re-designating Green Belt sites to Metropolitan Open Land (MOL) sound?</p>	<p>WoB4</p>	<p>GLA, CPRE</p>	<p>The Council believes this is a sound approach as it follows the recommendations of an objectively-prepared study. The parcels in question have been found to meet Green Belt purposes weakly, but to be continuing to perform a crucial role in relation to their open space function. The Council therefore agrees with the recommendations of the study that MOL would be an appropriate designation for these parcels, and that this would continue to provide them with robust protection against development. However, having reviewed the responses to the Regulation 19 consultation, the Council also acknowledges that there is an argument for retaining these parcels within the Green Belt. It therefore proposes this as an</p>

			option if the examination process finds that the parcels should not be redesignated as MOL.
Concern raised as to the impact of releasing parcels of green belt near to or on the boundary with neighbouring local authorities, especially where these perform strongly/moderately or form part of the strategic arc separating Greater London from Surrey	WoB4	LB Hillingdon, Spelthorne BC	The Green Belt Assessment has assessed the impact of releases on the wider Green Belt, and the Council has weighed up whether exceptional circumstances are demonstrated or not in all cases, a process which takes consideration of a range of factors. In the cases of those parcels proposed for release near or next to boundaries with neighbouring local authorities, site requirements include the need for a strengthened boundary of the site in order to provide a sufficient buffer with adjacent Green Belt.
The consultation fails to make clear the extent of changes to GB and is misleading. The assessment of site allocations within the SA (IIA) does not state which sites are in the GB currently	WoB4, IIA	CPRE, Community Groups, Individuals	The Council acknowledges the need to be clear on the proposed changes to the Green Belt boundary, but disagrees that the consultation was misleading. Regulation 19 version of the plan outlined the changes to the Green Belt in Figure 4.7a of the Plan, and background evidence also clearly sets out the details of which sites are proposed to be released/re-designated. The Council will seek to make the changes clearer in the submission version of the plan.
<b>Policy WoB 5 Design and Heritage</b>			
<b>Total number of responses: 10</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
Concerns over the impact from proposed tall buildings on the heritage assets in Feltham.	Policy WoB 5 Design and Heritage	Community Member	Development proposals will be expected to submit appropriate assessment during a planning application detailing the impact on heritage assets.
Policy could better highlight the opportunities for enhancement of the historic environment, with specific reference to Heritage at Risk.	WOB 5	Historic England	Reference to Heritage at Risk, and the diverse range of heritage assets in the WOB, has been added to the supporting text.
<b>Policy WoB 6 Connecting People and Places–</b>			
<b>Total number of responses: 16</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
Greenways route along the	WoB6(e)	Community	Comment noted. A cycle and

Longford River is supported, however a similar route should be created along lower Crane River valley that could provide a specific connectivity into Heathrow.		Group	pedestrian route along Crane River is included in the Plan, and it will provide additional connectivity to Heathrow.
There is insufficient large pieces of infrastructure rather than small interventions to remove obstacles to pedestrian and cycle routes	WoB6	Community Group	Noted, this approach has been taken forward in Transport Policy WOB6 where possible. The Council will continue to work with TfL to support smaller interventions in the borough. There are several junction improvements, cycle and pedestrian railway bridges and new/improved routes proposed as a part of the Plan.
The proposals rely heavily on the uncertain delivery of railway improvements, however no clear link has been made between the dependency of the new developments upon the transport improvements.	WoB6(b)(I)	Community Group, TfL	The Council has produced an extensive transport impact assessment to support the draft submission version of the Plan. This has been prepared to address existing and projected future transport network capacity issues and proposes a comprehensive programme of recommended enhancements that will ensure that the transportation network can handle the additional capacity needed as development comes forward. Development phasing has been considered in the draft submission version of the Plan to ensure that development is delivered to coincide with improvements to public transport accessibility, as set out in the study.
Crossrail 2 extension from Kingston to Heathrow should be considered.	WoB6	Individual	The feasibility of this link does not form part of any plans for Crossrail 2 as planned by the Mayor, and it would be unlikely to be delivered within the timescale of the Plan.
It is not clear whether the modelling used in the highways assessment has been referenced to include the proposed growth targets in the Draft London Plan particularly for surrounding boroughs and the cumulative impacts these would have on the highways capacity alongside the proposals in the WoBP.	WoB6	LB Hillingdon	The modelling used in the Highway Impact Assessment (HIA) utilises Transport for London's LTS demand model which includes full growth outside of the borough, with assumptions based on the London Plan to 2031. The model was based on the most up to date version of LTS available at the time. It should be noted that the draft New London Plan further tightens parking standards for

			<p>Outer London Opportunity Areas and as such it is anticipated that parking provision for new development in the WoB area will be lower than the assumptions in the HIA modelling.</p> <p>Policy WoB6 (n) requires development proposals to include Transport Impact Assessments as a part of the submission; therefore each development would be assessed against both its own impact, and the cumulative impact of other planned or existing developments, on the highway network. We have proposed modifications to the supporting text of policy WoB6 to clarify that development proposals will need to consider cumulative impact upon the road network within neighbouring boroughs.</p>
No account has been made to implications of expansion at Heathrow.	WoB6	LB Hillingdon + Surrey CC	Comment noted, however this is not within the scope of the Plan, as Heathrow expansion has not been approved yet, and will be a subject to a planning application that will necessitate appropriate mitigation measures.
The Transport Assessment does not mention several roads in Spelthorne	WoB6	Surrey CC	LBH has engaged with Surrey CC in order to discuss highways matters, and further evidence has been undertaken and provided to Surrey CC to support the approach taken. A SoCG is being progressed by both parties.
The Strategic Sites should be supported with Full TA that assesses the cumulative impact upon all modes.	WoB6	Surrey CC	It is not appropriate for full TAs to be undertaken or submitted at this stage in site allocation. Any conclusions would be purely speculative without the certainty of a developer on board. The approach LBH has taken looks at theoretical impacts through the strategic modelling and identifies locations where mitigation measures may be required. The Local Plan makes it clear that a full TA will be required for any major development and that is the appropriate time for a full TA to be

			submitted. LBH has engaged with Surrey CC in order to discuss highways matters, and further evidence has been provided to justify the approach taken. We have proposed modifications to the supporting text of policy WoB6 to clarify that development proposals will need to consider cumulative impact upon the road network within neighbouring boroughs. A SoCG is being progressed by both parties.
The policy assumes a significant modal shift away from car travel, evidence needs to be provided on how this will be delivered in this part of West London.	WoB6	Surrey CC	New Draft London Plan policy T1 states that development plans should support the delivery of Mayor's strategic target of 80 per cent all trips in London to be made by foot, cycle or public transport by 2041, and the Local Plan review is in compliance with such target. LBH has engaged with Surrey CC in order to discuss highways matters, and further evidence has been undertaken and provided to Surrey CC to support the approach taken. A SCG is being progressed by both parties.
<b>WoB Places Polices</b>			
<b>Total number of responses: 73</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
EA recommend WoB Place policies P1, P2, P3, P4, P5 be amended to ensure that flood risk, water quality and water resources, sustainable infrastructure and waste or contaminated land are taken into consideration when development is proposed within the West Of Borough - including clear statement that these policies be read in conjunction with strategic policies set out in LP2015.	All WoB place policies	Environment Agency	Strategic policies relating to flood risk, water quality and water resources, sustainable infrastructure, waste and contaminated land are set out in the Green and Blue Infrastructure (GB5) and Environmental Quality (policies EQ1-EQ10 inclusive) chapters of the adopted Local Plan (2015). LB Hounslow will begin work on a review of all adopted strategic policies as part of the full Local Plan review in 2021 once the Site Allocations, GWC and WOB Local Plan Reviews have been adopted. Please see the LDS for further details.
LB Hounslow should consider whether additional B1(a), B2 and B8 capacity could be	WOB P1	GLA	The evidence base has tested the scope for additional floorspace to be provided on a range of existing

<p>provided in the Feltham place area, instead of through Green Belt release.</p>			<p>employment sites in the borough, including in the Feltham place area. It has found that there is limited scope for intensification for such an approach, and that it would not deliver the scale and type of floorspace which has been found to be needed. In particular, it would not deliver the scale or type of floorspace needed to support the projected growth of the distribution and logistics sectors operating near to Heathrow Airport.</p>
<p>The Travelling Showpeople sites at Station Lane should be protected.</p>	<p>WOB P1</p>	<p>Individuals</p>	<p>Comments noted. The plan does not propose any changes to the current uses at Station Lane estate.</p>
<p>Is the safeguarding of land at Heathrow Gateway (HG) in compliance with national policy?</p>	<p>WoB P3</p>	<p>GLA, TFL, Heathrow Airports Ltd (HAL),</p>	<p>Comment noted. NPPF para 139 (part c) states that, where necessary, plans should identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. In the case of Heathrow Gateway, the land is identified as being a sustainable location for development only in the event that strategic transport improvements are delivered to serve any development here. Were such improvements to be delivered, this site would be capable of meeting additional employment development requirements, including meeting the specific qualitative need for a modern office campus identified in the ELR and ELR Update. It would also be capable of meeting longer-term development needs beyond the plan period, and some of the additional requirements which would be likely to be generated by any future airport expansion schemes at Heathrow. It would also be able to contribute to meeting some of the unmet housing requirements in London. Overall, if strategic transport infrastructure was provided to ensure that the site was made a sustainable</p>

			location (and subject to appropriate consideration of site constraints such as the SAM and the SINC designations), the Council considers that it would offer a unique opportunity for a mixed-use community including offices and homes, such that exceptional circumstances could be demonstrated justifying Green Belt release.
Does the inconsistency between the proposed Heathrow Gateway safeguarding and the uses identified in the Heathrow preferred masterplan consultation render the policy unsound?	WoB P3	GLA, HAL, LB Hillingdon, Individuals	The Heathrow Gateway site is being proposed for release from the Green Belt to be safeguarded for strategic transport infrastructure, and this is not a position that is dependent on the Heathrow Expansion project. The purpose of the safeguarding is to ensure the provision of strategic transport infrastructure to make the site sustainable for capturing the unique opportunity for a high-quality mixed community at this location, including housing, leisure and employment development. Whilst the identified uses in the Heathrow masterplan are acknowledged by the Council, it is noted that the timescales for the expansion project, and the precise form it will take, are uncertain at this stage following the Court of Appeal decision on the airports national policy statement in February 2020. The Council also notes that the response from Heathrow Airport Limited is supportive of the plan's position on Heathrow Gateway.
How deliverable is Southern Rail Access? If there is no guarantee over its delivery, what is the council's contingency plan for the Heathrow Gateway site?	WoB P2	GLA, TFL, HAL, Individuals	Comments noted. LB Hounslow continues to promote a preferred alignment for this new link which would connect Feltham to Heathrow via a new station in Bedfont. There are several other possible alignments and all are to be assessed by DfT. A meeting was held with DfT in May 2019 to outline to stakeholders how a framework for the assessment of the various proposals would be created. LB Hounslow will be

			<p>included in an engagement exercise regarding the objectives by which each alignment will be assessed. The objectives will then be used as the basis of a Strategic Outline Business Case which will be developed for each proposed alignment. This will include an investigation of the cost and benefits of each scheme as well as an indication of deliverability. This has been temporarily delayed by the need to respond to COVID-19 however all parties continue to engage with one another and will re-commence work at the appropriate time.</p> <p>The Heathrow Gateway site is safeguarded only to be release for development should Southern Rail Access or Strategic transport infrastructure be secured within or outside the plan period.</p>
<p>GLA objects to de-designation of Green Belt for the delivery of HG which is primarily a Grade A office development to support the growth of Heathrow. Office development of this nature should be directed to the CAZ (or CAZ reserve) such as Old Oak Common which will have a direct link to Heathrow. Could also direct some of this office development to Hounslow town centre, Chiswick or the GWC.</p>	<p>WoB P3</p>	<p>GLA</p>	<p>The primary purpose of releasing Heathrow Gateway from the Green Belt is to enable the delivery of strategic transport infrastructure to make the site sustainable. Regarding the alternatives for office delivery, the evidence base supporting the plan has demonstrated that major office development in the borough's town centres would not be viable in this plan period. It has also shown that the borough cannot meet its full requirement for office floorspace, and the Council does not consider it a sustainable option that this floorspace is located outside the borough, in a way that would fail to capture employment opportunities in the borough and the growth potential of a location near to Heathrow Airport. The use of Heathrow Gateway for offices would enable the borough to meet this quantitative office requirement. It would also enable the council to meet the specific qualitative need identified for a high-quality,</p>

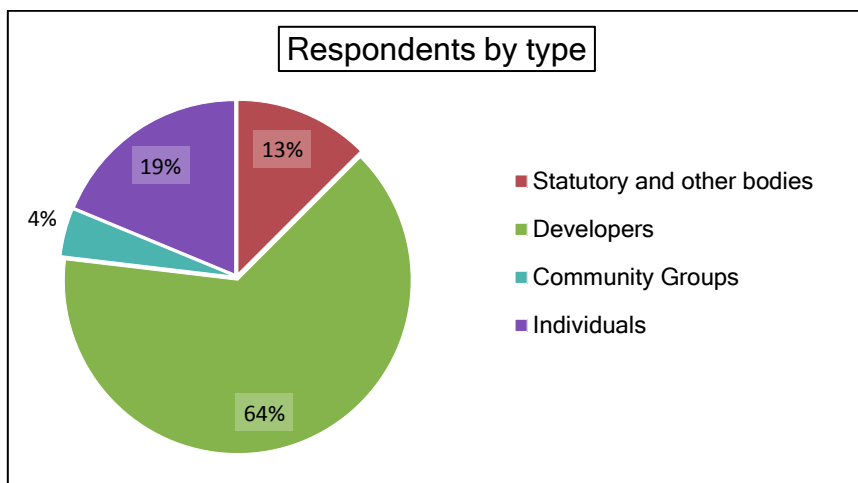
			<p>campus-style office park. The evidence base states that the site would offer a 'compelling' location for an office development were it to be supported by good public transport accessibility to both the airport and the borough's labour supply. As a mixed-use office and housing site, the evidence base says it is well placed to provide Heathrow-related opportunities for Hounslow residents without the need to travel into Zone 1 and 2.</p>
<p>Policy P3 should be amended to reference the requirement to safeguarded part of the land for extraction of minerals in accordance with Local Plan Policy EQ10(b).</p>	<p>WOB P3</p>	<p>Developer</p>	<p>Comments noted. Supporting text has been amended to include reference to the mineral safeguarding designation.</p>
<p>Is the allocation of Airport Business Park (ABP) for employment development sound?</p>	<p>WoB4</p>	<p>GLA, HAL</p>	<p>Yes. Paragraphs 137 and 138 of the NPPF allow for land to be released from the Green Belt through local plan reviews where exceptional circumstances have been demonstrated. In this case, the Council believes that the significant requirement for additional industrial floorspace, the limited scope for such extra floorspace to be delivered through existing sites and other land within the urban area, together with the qualitative requirement for additional industrial floorspace to be provided in the vicinity of Heathrow airport, represent exceptional circumstances at a strategic level. It further believes that the suitability of the site for industrial development, subject to the recognition of key constraints within the site, represents exceptional circumstances at site level for releasing the site. Overall, the Council believes that the benefits the site would bring for development when compared with the harm to the Green Belt resulting from its release, represent exceptional circumstances justifying the removal of the site from the Green Belt. This site is needed to meet our OAN for Industrial</p>

			floorspace without a third runway.
What impact does the possible relocation of the Immigration Removal Centre onto ABP have on the deliverability of the quantum of employment development on the site? How much employment capacity would be lost?	WoB4	HAL, LB Hillingdon, SEGRO	The Council notes that a final decision on the IRC location has yet to be taken, and therefore that this site is at present available for development. Were the IRC to be located at ABP, the Council believes that this would not render it unsuitable or unavailable for the quantum of employment floorspace envisaged in the plan at this site. Policy has been amended in accordance with GLA recommendations to explore the feasibility of developing the industrial floorspace in a multi-decked format
Soundness issues raised in relation to policies WOB P3 & P4 and associated site allocations relating to the potential re-location of an Immigration Removal Centre (IRC) in either location as part of the Heathrow Expansion project. Specific issues raised in relation to the green belt review process, biodiversity loss, the consultation being misleading, and other issues relating to the negative impact upon the local economy and health & wellbeing of residents.	WoB3 and WoB4, SAs	Community groups / individuals	The Council objects to the re-location of the IRC within the borough and did not include this within the Regs19 version of the Plan for this reason. The Council also considered it too late in the plan making process to include. It is acknowledged that if Heathrow Expansion does go ahead the relocation of the IRC would be done through the DCO process – over which the Council has limited control. In the event that this does take place, the Council will work with Heathrow Airports Ltd. (HAL) to try to mitigate the impact of re-location in order to protect the amenity of residents, reduce harm to biodiversity and safeguard the placemaking aspirations of the borough.
<b>WOB7 Delivery and Monitoring</b>			
<b>Total number of responses: 3</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
Policy should be amended to include a mechanism for early Plan review should housing delivery / growth not be achieved (as indicated through monitoring).	WoB7	Developers	Both the Planning regulations (Regulation 10 A of the TCP(LP) 2012 Act) and the NPPF (paragraph 33) require Local Planning Authorities to review Local Plans at least once every 5 years. Furthermore, the NPPF states that strategic policies are likely to require earlier review if local housing need is expected to

			change significantly in the near future. Details of LB Hounslow's local plan review schedule can be found in the updated Local Development Schedule. LB Hounslow will continue to monitor the performance of its housing policies against housing delivery as part of its annual monitoring programme and this will inform future policy development to be taken forward through regular Plan reviews.
Key performance indicators around net gain for biodiversity should be amended to refer to 'units of BNG/units lost' and further KPI around % area of SINC's in positive management (for biodiversity) and favourable condition	WoB7	London Wildlife Trust	Comment noted and minor amendments made to include KPI around % SINC's in positive management and favourable condition
<b>WoB Procedural / Other</b>			
<b>Total number of responses: 44</b>			
<b>Summary of Main Issues</b>	<b>Relevant Policy Point</b>	<b>Respondent</b>	<b>LBH Response / Action</b>
The consultation process was misleading (particularly relating to Green Belt and IRC re-location) and/or plan documents were not written in an accessible format	N/A	Individuals	Comments noted. The Council considers it has undertaken extensive and appropriate consultation on the WoB Plan. Issues raised in relation to consultation around Green Belt release and IRC re-location are addressed above. Efforts have been made to ensure the draft Local Plan Review documents are written in accessible language and a number of community workshops have been held throughout the plan preparation process to allow residents to discuss the contents of the Plans with officers.

## Regulation 19 Pre-Submission Draft Vol.2 Site Allocations Local Plan review

In total, 103 representations made pursuant to Regulation 20 were received which related to the Draft Vol.2 Site Allocations document, generating 181 responses. The table below breaks down these responses by respondent type.



**Table 3.11: Summary of some of Regulation 20 main responses to the Regulation 19 Pre-Submission Draft Volume 2: Site Allocations Local Plan review:**

Site Allocations			
Total number of responses: 181			
Summary of Main Issues	Relevant Policy Point	Respondent	LBH Response / Action
Early Phasing of Sites in the Great West Corridor is not realistic on the basis of required infrastructure improvements and speed of delivery due to present occupation.	Site Allocations	Individuals and Resident Groups.	The Council has engaged closely with developers and Infrastructure providers to ensure that phasing will come about in a way which is deliverable and phased with improvements to infrastructure to support growth.
Site Allocations should be amended to refer to the maximum parking standards in the emerging London Plan	N/A	Statutory Bodies	Comments noted. The council has amended references to minimum development quantum for car parking and added reference to the maximum parking standards as set out in the Draft London Plan.
206–210 Hanworth Road (82) and Vacant Land Clarence Terrace (83) should be amended to require car free development.	N/A	Statutory Bodies	Comments noted. The sites have been amended to conform to the Draft London Plan.
Site allocations should be amended to ensure they refer to the presence		Statutory Bodies	Comments noted. Wording has been amended for clarity .

on site or adjacent to the site of Sites of Importance for Nature Conservation (SINCs).			
Sites Heathrow International Trading Estate (43) and Vacant Land at Dick Turpin Way (48) should be amended to refer to their crossing or in close proximity to National Grid Infrastructure.		Statutory Bodies.	Comments noted. Amendments have been made to the planning constraints sections of these allocations to refer to the specific infrastructure.
The Citroen Site, Capital Interchange Way, should remain allocated from the current (2015) document.	N/A	Developer	Comments noted. The Citroen site has been retained as an allocation with an updated proforma (Site A1)
Gunnersbury Station Car Park (37) should be amended to include the station and platforms within the site boundary to ensure the allocation is effective in delivering the requisite improvements forming part of the site requirements; amendments should be made to require improvements to the access and public realm and remove reference to maintenance of the existing arrangement; the planning constraints should reference the public right of way across the site; reference should be made to the provision of step-free access to the station platforms should be added.		Community group	Comments noted. The requirement for step free access to the platforms is already included. Reference to the public right of way has been included and the site boundary has been amended to fully reflect the station and proposals contained in the GWC masterplan. The requirements for access have been amended to remove reference to maintenance the existing arrangement.
Tesco Osterley (2) should be updated to reflect the increased capacity for homes; greater clarity on uses proposed for site to include reference to small format retail if the current store is relocated to Homebase (11); development should refer to the number of spaces rather than area of the car park; reference to public access the Water Gardens should be removed.	N/A	Developer	Comments noted. The minimum development quantum of the site has been amended to reflect Berkley St James representation, and draft SoCG including reference to small format retail, the removal of the car parking floorspace quantum and Water Gardens restrictive covenant,
Homebase (12) should be updated to reflect the increased capacity for homes (500); make clear that the scenario involving redevelopment for a large format retail store, residential and other specified uses is the preferred option; remove reference to a minimum floorspace for the car park; and recognising that the height range is a benchmark subject to detailed design.	N/A	Developer	Comments noted. The minimum development quantum of the site has been amended to reflect Berkley St James representation, and draft SoCG including, including reference to removal of the car parking floorspace quantum, Relocation of large format Tesco, height of development and Site Requirements section.

<p>Phoenix Business Park (26) may not be deliverable owing to the proposed mixed use industrial intensification, including stacked industrial in the allocation, and therefore the plan may not be effective.</p> <p>It should be amended to remove reference to minimum development quantum; reference should be made to the suitability for a focal building and a Flagship car dealership.</p>	N/A	Developer	<p>Comments noted. The proposed minimum development quantum is required to ensure the delivery of a mix of uses on the site which protect and intensify industrial use and accord with the objectives of the GWCLPR. The Place Policy (GWCP2) and GWC5 clearly set out the height framework for sites and how these should be assessed in relation to heritage assets, including the World Heritage Site at Kew. Reference has been made to the suitability of the site for a Flagship car dealership.</p>
<p>27 Great West Road (28) should include reference to a broader range of uses to support placemaking, including leisure and other complementary uses. It should be amended to remove the minimum development quantum and prescriptions in terms of the positioning of commercial buildings fronting the Great West Road.</p>	N/A	Developer	<p>Comments noted. The proposed minimum development quantum is required to ensure the delivery of a mix of uses in accordance with the spatial strategy and places policy and accord with the objectives of the plan.</p>
<p>110 Power Road (26) should be allocated for Office use on the basis of the evidence in the Employment Land Review (2016).</p>	N/A	Developer	<p>Comments noted. The Employment Land Review provides updated evidence on employment need in the borough. This identifies that the need for offices is principally for large office parks. The site is of limited size and therefore cannot fulfil this demand. Furthermore, the study identifies that Power Road can support the delivery of industrial uses and intensified industrial floorspace.</p>
<p>Gillette Factory (3) should include reference to "commercial" uses as in order to support the aspirations for the site, and the minimum development quantum should be removed owing to the fact that Innovative creative, film, digital and media uses do not necessarily fall within specific land uses.</p>	N/A	Developer	<p>Comments noted. The proposed amendment to refer to commercial uses is considered to be too broad, particularly if amended alongside removal of the minimum development quantum. Innovative creative, film digital and media uses fall within the range of uses within classes b1c, b2 and b8 and this also provides sufficient flexibility to ensure the delivery of a mix of industrial uses in accordance with new draft Londo Plan, the need in the borough, the spatial strategy</p>

			and places policy of the plan..
The Mille Building (19) could be made deliverable and effective by broadening the range of uses allocated to the site to include residential units and supporting a taller building than is currently proposed.	N/A	Developer	Comments noted. This site is fully enclosed by the Great West Road (A4) its junction with Boston Manor Road (A3002) and raised section of the M4 as being particularly exposed to these forms of pollution, the Council has supporting evidence of this. Therefore, in order to ensure that new development complies with the objectives of the plan, the site is not considered suitable for allocation for residential uses.
Enterprise Car Rental (21) should include reference to a greater range of uses than b1c in order to support meeting OAN for employment and ensure the allocation is effective and justified.	N/A	Developer	Comments noted. The minimum development quantum and uses for the site have been amended to reference a broader range of industrial uses (b1c,b2,b8).
1-4 Capital Interchange Way (31) is generally supported, but the proposed minimum development quantum for business use should be amended to reflect the amount that the council planning committee resolved* to permit within planning application P/2018/4117. <i>*Note the application was formally approved and decision issued on 23/03/2020.</i>	N/A	Developer	Comments noted. The minimum development quantum retained in order to ensure the development comes forward in a sustainable way in advance of permission being implemented.
BSS Brentford (6) should be amended to ensure it correctly reflects the Golden Mile station is outside of the site boundary, and that development of the site is not linked to the delivery of the station. Furthermore, the site requirements should ensure they do not prejudice the operation of the rail related and minerals uses accessed via Transport Avenue.	N/A	Developer	Comments noted. The allocation has been amended to reflect the position of the proposed station outside the site, remove reference to development being linked, and to strengthen reference to the protection of access to the industrial uses within the Transport Avenue SIL.
Profile West Brentford Car Park (7) should be amended to ensure that they do not prejudice the operation of the rail related and minerals uses accessed via Transport Avenue.	N/A	Developer	Comments noted. The allocation has been amended to refer to a commercial buffer against Transport Avenue.
West Cross Campus (5) site requirements should be amended to ensure they provide sufficient restriction to protect the Transport Avenue Industrial Quarter uses and accord with the agent of change	N/A	Developer	Comments noted. The allocation has been amended to strengthen the protection of the Transport Avenue Industrial Quarter, and the revised SIL boundary will ensure any proposed residential uses are

principle in the NPPF.			not located against the boundary with Transport Avenue industrial Quarter.
Sainsbury's Chiswick (107) should be amended to increase the minimum development quantum for residential units to reflect the sites central location, and to reference provision of car parking for the residential element of the development	N/A	Developer	Comments noted. The allocation has been amended to reflect the requirements of the Draft London Plan Parking standards. The minimum development quantum are minimums and will be subject to the detailed design presented in any future planning application for the site.
Hounslow Bus Garage (91) should be amended to reference the existing use of the bus garage to Sui Generis, amend the minimum development quantum for residential units, amend reference from industrial to sui generis uses for the re-provided bus garage, and reference to the approach to height should be amended to require regard is had to the height of surrounding buildings as opposed to their use as a starting point in order to make the allocation effective. The minimum development quantum for the bus garage, and reference to a high capacity garage should be removed as it is too restrictive and may mean the development is not effective or deliverable.	N/A	Developer	Comments noted. The minimum development quantum of the site has been amended to reflect the representation from TFL Commercial Development, and draft SoCG including reference to the existing use has been amended to Sui Generis, and references to height of surrounding buildings have been amended.
Osterley Station (80) should be amended to reference an increased number of residential units; reference to protecting and enhancing the listed station building should be amended in line with national requirements for listed buildings; and reference to the approach to height should be amended to require regard is had to the height of surrounding buildings as opposed to their use as a starting point. The Site Allocation document does not provide evidence of any technical assessment that supports the proposed minimum development quantum for this site; it should be amended to make	N/A	Developer; Individual	Comments noted. The minimum development quantum of the site has been amended to reflect representation from TFL Commercial Development, and draft SoCG including reference to the requirement for development to protect and enhance the listed station is in accordance with CC4 of the Hounslow Local Plan (2015) and reference to the approach to height.

reference to the listed buildings and its role in restricting height of new development, as well as greater reference to the appropriate scale of building on the site.			
Land r/o Princes Way (94) should be allocated for development, either for residential or a mixed use development.	N/A	Developer	Comments noted. Land r/o of Princes Way is allocated in the Local Plan Review, at site 94.
Land at Bridge Road Depot (Site 88) should be amended to remove existing housing contained within the site plan, and the redline should be expanded to take in the wider centre of the works site.	N/A	Developer	Comments noted. The redline has been amended and capacity reassessed based on the exclusion of the erroneous housing included. The centre of the site is not available for redevelopment and so cannot be allocated.
Land at James Street (89) should not be designated through the plan as open space and the allocation should be amended to remove reference to public access to the site in order to ensure deliverability.	N/A	Developer	Comments noted. The site is no longer designated as open space through the plan in accordance to the Open space Strategy. The requirement for public access to the site will support meeting the objectives of the plan and placemaking by improving wayfinding and access through the area.
Brentford Group Practice (101) should be amended to remove the minimum development quantum for Assembly/Leisure (Use Class D2) as this compromises the deliverability of the allocation by impairing its commercial viability. In addition, the reference to car parking should be amended to take account of the needs of the health facility and residential units.	N/A	Developer	Comments noted. The minimum development quantum for D2 floorspace has been combined with the requirement for D1 floorspace within the minimum development quantum to ensure provision and expansion of the health facility. The requirements for carparking have been amended to conform with those in the draft London Plan.
Chiswick Health Centre (44) should be amended to remove the minimum development quantum for Assembly/Leisure (Use Class D2) as this compromises the deliverability of the allocation by impairing its commercial viability and provision of the health centre. The minimum development quantum for housing should be increased to 48 units. In addition, the reference to car parking should be amended to take account of the needs of the health facility.	N/A	Developer	Comments noted. The minimum development quantum for D2 floorspace has been combined with the requirement for D1 floorspace within the minimum development quantum to ensure provision and expansion of the health facility. The minimum development quantum for residential units has been increased to 30 units in accordance with the density by design approach to capacity assessment. The requirements for carparking have been amended to conform with those in the draft

			London Plan.
Albany Riverside and Brentford Police Station (Sites 11 and 15 in Hounslow Local Plan 2015 Volume 2) should not be deleted and should be retained in the revised volume 2.	N/A	Developer	Comments noted. Albany Riverside and Brentford Police Station have been retained as allocations with updated proforma (Sites A2 and A3). This will be presented to the Inspector for inclusion to Volume 2.
Industrial sites in the borough, known as Clock Tower Industrial Estate, National Works Business Park and Heston Industrial Mall are suitable for industrial intensification and are deliverable to help to meet OAN.	N/A	Developer	Comments noted. A Statement of Common Ground has been prepared with the developer. The sites are not available however it could come forward as part of any future Review of the Hounslow Local Plan.
Former Travis Perkins Staines Road (86) should be amended to remove reference to the provision of industrial floorspace as this is not deliverable owing to the lack of demand for the type of site, is not within an area identified for direction of industrial uses and is partially within the public safety zone.	N/A	Developer	Comments noted. The provision of a mixed use industrial and residential development is considered to be viable in this area of the borough, and would support meeting the objectives of the West of Borough Plan, specifically employment objective 2, and WOB1 by protecting the use of the and ensuring availability of a range of workspaces and unit sizes, start-up space, co-working space and 'grow on' space by protecting the existing floorspace.
Land at Cargo Service Centre, Bedfont Road should be removed from the area of Land safeguarded to be removed from the green belt at Heathrow Gateway and be proposed for release from the green belt and allocated for industrial uses in order to support the provision of employment floorspace in the West of Borough	N/A	Developer	Comments noted. The land in question forms part of parcel SA13-b of the Green Belt Review, Stage 2. The WOBLPR seeks to safeguard the land in question to deliver new strategic transport infrastructure in the form of a station at Bedfont serving a new Southern Access rail route to Heathrow Airport with 2,060 homes and 115,000 sqm of office floorspace alongside supporting uses. As the development is contingent on this transport infrastructure being delivered, the Council is proposing to safeguard the land for this development rather than allocate the site. Exceptional circumstances for the part of the site in question to be released from the Green Belt have not been demonstrated and

			therefore the site has not been allocated.
Land at Hounslow West Station (74) should be amended to provide a minimum development quantum for residential units matching that (300 units) previously published in the Draft WOBLPR, instead of the 200 units proposed at present in order to ensure that the allocation optimises development capacity and does not contribute to an undersupply of homes and is therefore positively prepared and effective. An alternative amount that would be appropriate would be 400 homes in accordance with the sites PTAL and location within the Heathrow Opportunity Area. The minimum development quantum for retail (A1-A4) uses should be returned to the level in the Draft Plan (920sqm), but this floorspace should be allocated for a broader range of flexible retail, business and community use in order to support the local centre. The minimum development quantum for car parking should be removed as it is not in compliance with Draft London Plan policy T6, and should be stated in parking spaces throughout the document as opposed to floorspace. The requirement to preserve and enhance the listed building should be amended to align with national policy by removing reference to enhancement, and reference to the approach to height should be amended to require regard is had to the height of surrounding buildings as opposed to their use as a starting point in order to make the allocation effective.	N/A	Developer	Comments noted. The minimum development quantum of the site has been amended to reflect TFL Development representation, and draft SoCG including reference to the proposed use of the retail floorspace to allow more flexible A1-A4, D1 and D2 uses; the quantum for car parking removed and replaced with reference to London Plan maximum parking standards and reference to heights.
New Road Triangle (53) should be amended to remove reference to the SINC as this is adjacent to the site, and the requirement for the height of new development to be in conformity with the Feltham Masterplan should be amended in	N/A	Developer; Individual	Comments noted. Reference to the SINC designation has been amended to indicate its adjacency to the site. Reference to the Feltham Masterplan has been amended to require regard is had to the document in order to

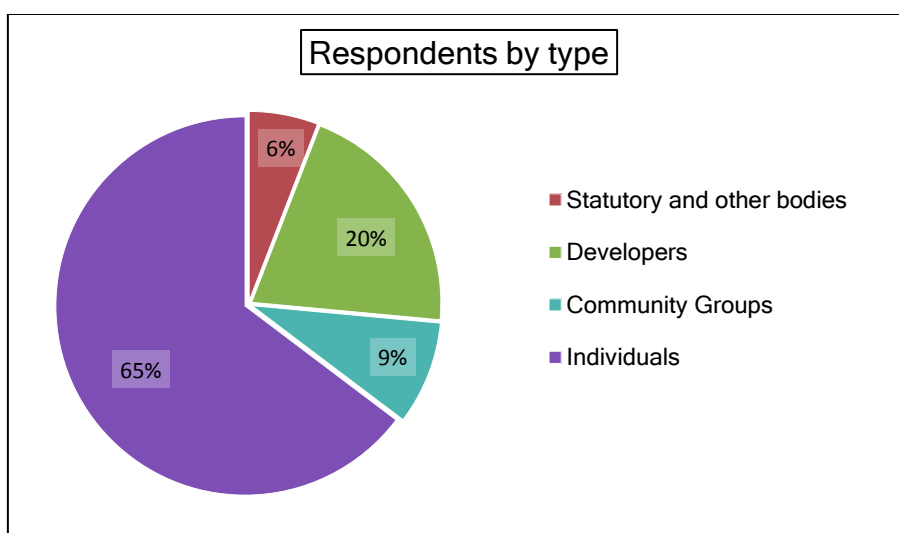
order to ensure a more flexible approach to providing landmark and tall buildings.			ensure the allocation is effective.
Land at Bedfont Lakes (West) 753 Staines Road (42) should be amended to increase the site boundary to take in the adjacent permitted hotel site to the east and de-designate the green belt between the sites, in order to support the delivery of a comprehensive development which improves public access to open space, on the site and create a sound plan.	N/A	Developer	Comments noted. The Green Belt Review, Stage 2, identified the parcel within the amended site boundary as strongly performing and recommended to remain in the Green Belt. Furthermore, the Hotel development has permission, which is considered to be deliverable, and the allocation seeks to encourage a walking and cycling access route between the site and hotel development.
Airport Business Park (57) should be amended to increase the boundary to include Hatton Farm in order to make effective use of the land to help support employment needs, on the basis that the land which in the Stage 2 Green Belt Review, is proposed for release from the Green Belt but has not been recommended for re-designation to MOL, and would be unsuitable for local open space owing to the Public Safety Zone designation. The proposed uses on the site should be amended to reference a broader range of employment uses in order to provide greater flexibility, and to make reference to the restrictions on height created in order to safeguard the functioning of the air traffic control facility within the site. Owing to the presence of playing fields within the allocation, it is not compliant with the NPPF. The proposed should make reference to the potential for a detention centre on the site clear in proposed uses.	N/A	Developer; Statutory Bodies; Individuals.	Comments noted. The allocation has been amended to include the land at Hatton farm, subject to compliance with the Public safety zone designation (DfT circular 01/2010). The site is being allocated for specific industrial uses to meet Objectively Assessed Need for employment floorspace as identified in the Employment Land Review, which specifically requires industrial land to support the transport and logistics sector. Without these sites we cannot meet this need. On this basis, the land is being allocated as part of a release of Green Belt, under exceptional circumstances, to meet this need, and it would result in a significant weakening of the circumstances if these sites were to be allocated for uses outside the scope of this specific need. Proposals for development on the site will be subject to assessment as to the effects on the air traffic control facility as part of the planning application. The site boundary does not contain a playing field, and so there is no loss of a facility owing to the development. Reference to a detention centre would not support the objectives of the plan to provide for identified need for additional industrial floorspace to serve Heathrow.

<p>Land at Dick Turpin Way (48), Land at Fagg's Road (49) and Heathrow International Trading Estate (43) should be amended to refer to reference a broader range of employment uses in order to provide greater flexibility.</p>	<p>N/A</p>	<p>Developer</p>	<p>The site is being allocated for specific industrial uses to meet Objectively Assessed Need for employment floorspace as identified in the Employment Land Review, which specifically requires industrial land to support the transport and logistics sector. Without these sites we cannot meet this need. On this basis, the land is being allocated as part of a release of Green Belt, under exceptional circumstances, to meet this need, and it would result in a significant weakening of the circumstances if these sites were to be allocated for uses outside the scope of this specific need.</p>
<p>Hounslow Cavalry Barracks (84) should be amended in order to make the allocation justified and effective. The planning designations should be amended to refer to the site's inclusion in the Cavalry Barracks Conservation Area (CA), rather than stated as being adjacent to the CA. The reference to the restriction of family housing within the 63dba Heathrow noise contour is not justified and should be removed. The minimum development quantum should be amended to only state a minimum for residential units with other uses reference in the land uses section, and in accordance with the Cavalry Barracks SPD. Site requirements should be amended to refer to the Cavalry Barracks SPD. Furthermore, the allocation should be amended to ensure there is no loss of playing pitches within the site.</p>	<p>N/A</p>	<p>Developer</p>	<p>Comments noted. Reference to the location of the development within the Conservation Area has been updated. The requirement regarding the noise contour has been amended to ensure compliance with Local Plan 2015 Policy E5. The minimum development quantum set out in the allocation are based upon the capacity assessment carried out for the site as part of the SACA (2020), with proposed non-residential uses based upon the assessment of potential non-residential uses produced to support the Cavalry Barracks SPD. The quantum are required to ensure that the development complies with the objectives of the plan to deliver high quality developments and placemaking; to respond to comments made by Historic England regarding the site, and to ensure conformity with the Draft London Plan. The site has been amended to make reference to the Cavalry Barracks SPD. The site requirements for the site have been amended to require playing pitches are retained and enhanced.</p>
<p>Site Allocations should provide additional B2/B8 capacity.</p>	<p>Site Allocations;</p>	<p>Mayor of London</p>	<p>The council has struck a balance between provision of industrial</p>

	1,2,3,4,6,7,8,9,10,11,12,13,14,26,27,33,34,35,36		floorspace and other site requirements, including meeting the need for housing and accessibility to the sites. Overall the Local Plan Reviews seek to deliver 182,770 sqm of industrial floor space.
Site Allocations should result in plot ratio of 65% for industrial development.	1,4,5,6,7,13,14	Mayor of London	Comments noted. It should be noted that the plot ratio requirements have been removed from the Draft London Plan by way of Direction issued by the Secretary of State on 13 March 2020.
Early Phasing of Sites in the Great West Corridor is not realistic on the basis of required infrastructure improvements and speed of delivery due to present occupation.	Site Allocations	Individuals and Resident Groups.	The Council has engaged closely with developers to ensure that phasing will come about in way which is deliverable and phased with improvements to infrastructure to support growth.
The Site Allocation needs to be amended to make them more effective by providing detail relating to the development envelope for each site is, in order to allow development potential of the specific site to be maximised whilst also ensuring that all the objectives of the Local Plan and LPRs is met.		Community Groups	Comments noted. The site allocations establish a minimum amount quantum of development for each site, utilising the density by design approach as outlined in the SACA. This provides an appropriate level of growth for sites in order to support meeting the objectives of the plan and provide effective allocations and certainty to site owners. Detailed discussion of the appropriate height for developments can only be considered at the application stage.

## Regulation 19 Pre-Submission Local Plan review – Evidence Base documents

6.18 In total, 61 representations made pursuant to Regulation 20 were received which related to the Local Plan Review Evidence Base. The tables below break these responses down by respondent type and policy / theme area.



**Table 3.12: Summary of Regulation 20 responses to the Evidence Base to support the Regulation 19 (Pre-Submission) Local Plan reviews:**

Evidence base			
Total number of responses: <b>61</b>			
Summary of Main Issues	Relevant Policy Point	Respondent	LBH Response / Action
The Plan is not legally compliant and does not meet all the tests of soundness as the Habitats Regulations Assessment (HRA) does not fully assess the negative impact of increased recreational pressure on Bedfont Lakes and Princes Lake (functionally linked to the South West London Water Bodies SPA). More evidence is required to show how an increase in visitor numbers will be managed to avoid disturbance to protected species.	N/A	Natural England	LB Hounslow has prepared additional information as requested. An update to the HRA has been undertaken and this has been shared with Natural England, who have confirmed that, providing the measures identified at Bedfont Lakes Country Park and Princes Lake to mitigate an increase in recreational pressure can be secured in perpetuity, there would be no Likely Significant Effect on South West London Waterbodies SPA. LB Hounslow will continue to work with Natural England to ensure future development does not impact upon protected sites or

			biodiversity.
The Sustainability Appraisal (SA) does not conclude that the proposed strategy is an 'appropriate option' when considered against reasonable alternatives for housing need.	WoB IIA	Developers	The SA forms part of the evidence base to support the Local Plan reviews. As such the SA does not have to conclude that the proposed strategy is an 'appropriate option' when considered against reasonable alternatives for housing need. The Plan itself proposes our preferred strategy to meet our housing need in accordance with sustainable development, the soundness of which will be tested by the Inspector at the Examination in Public.
The assessment of reasonable alternatives around a) re-designating weakly performing Green Belt to MOL or b) retaining this as Green Belt contained in the SA to support the WoB Local Plan Review is flawed as it fails to consider further options around: releasing to development land; and re-designation to an alternative open space designation (e.g. Local Open Space)	WoB IIA	Developers	The Council believes that releasing these parcels for development or redesignating them as local open space would not represent a reasonable alternative. The evidence base – comprising an objective assessment of the Green Belt – found that these parcels had a particular open space value which merited continued strong protection. Specifically, it recommended that these parcels should be redesignated as MOL. The Council therefore believes that the only two reasonable alternatives for these parcels are to either re-designated them as MOL, as recommended, or to retain them as Green Belt.
WoB IIA / SA references some unavoidable impact to habitats and species as a result of new development, and note impact through loss of SINC designated land in Bedfont Lakes and Heathrow Gateway areas. The IIA does not do enough to assess detrimental impact or provide for necessary mitigation / compensation.	WoB IIA	London Wildlife Trust	Whilst the IIA (SA) does note the potential for some unavoidable short term impacts to locally designated SINC as a result of development in the WoB area, the SA also concludes that new development offers significant potential for the enhancement of biodiversity networks if high quality multifunctional green infrastructure provision is incorporated within new growth areas – such as would be required by policy WoB4. As such, the overall appraisal findings conclude that the Likely Significant Effects of plan policy upon biodiversity and green infrastructure would be positive. An update has been provided to the

			SA/IIA to provide more detailed assessment of likely detrimental impacts. Where development affects designated SINC, site requirements set out that ensure that developments avoid, mitigate or compensate any significant adverse impact on biodiversity and that development secures a biodiversity net gain. The plan also requires developments in the Green Belt to contribute towards compensatory improvements to land remaining in the Green Belt/MOL.
The impact of proposed re-designation of Green Belt has not been fully assessed within the IIA in terms of the impact on landscape character and the strategic function of the metropolitan Green Belt, particularly in the context of the overall loss of Green Belt proposed in the HAL Preferred Masterplan for Heathrow expansion. The evidence prepared in support of the WoBP takes insufficient account of these strategic considerations in establishing exceptional circumstances and consequently the chosen growth option is not presently justified.	WoB IIA	LB Hillingdon	Stage 1 of the Green Belt Assessment assessed the strategic function of the Green Belt and provided commentary on the landscape character of individual parcels. Stage 2 of the assessment provided an appraisal of the contribution of sub-areas to the functioning of the wider Green Belt. The Exceptional Circumstances assessment has considered all of these factors, as well as a range of other factors, to arrive at a conclusion as to whether exceptional circumstances are demonstrated in each case. Regarding the Heathrow Expansion Project, the Council acknowledges that any future Heathrow expansion project may have major impacts on the Green Belt and its future role. However, at the current time, the exact form and timing of the proposal is unknown, and its wider strategic impacts will be considered through other processes such as the development consent order and the Heathrow Strategic Planning Group. The current Green Belt review being taken forward in the WoB Plan is critical in allowing the borough to meet its development requirements, and the Council considers that exceptional circumstances are demonstrated for the Green Belt changes irrespective of whether Heathrow Expansion

			proceeds or not.
There are discrepancies between site boundaries in the Vol2 Site Allocations and IIA Technical Annex	IIA Technical Annex, Vol2 Site Allocations	Community groups (Brentford Voice)	Comments noted. Officers have now rectified this error and the site allocation red line boundaries as shown in the IIA Technical Annex now match those given within the draft Vol2 Site Allocations Local Plan review.
The IIA/SA does not provide evidence to explain the relationship between OAN for housing or employment and the housing targets in the Plans.	GWC & WoB IIAs	Community groups (Brentford Voice)	Comments noted. Detailed information of this relationship can be found in the housing and employment section of the plans. The IIA has tested the approach to meeting OAN across the borough.
The Integrated Impact Assessment does not provide a proper justification for considering the co-location of residential and employment uses as proposed within the Plan	GWC IIA	Community groups (Brentford Voice, OWGRA)	The IIA indicates that the colocation of residential and employment uses on existing sites would – provided that a suitable design framework was met including compliance with the Agent of Change principles – represent the most sustainable option. This approach would also be in compliance with the NPPF and the New London Plan.
The Plan does not contain clear evidence that the adopted approach is the most appropriate given the reasonable alternatives. The Integrated Impact Assessment that accompanies the Plan does not provide a clear audit trail showing how and why the preferred approach was arrived at.	WoB & GWC IIA	Community groups (Brentford Voice)	The IIA has tested reasonable alternatives to the plan throughout preparation at Draft and Draft Submission stages and indicate that they represent an appropriate approach and are justified based on proportionate evidence.
The Plan should be revised to include a clear impact assessment of the GWC Plan on Brentford Town Centre and the required actions and amendments to the Plan to ensure the impact is in line with LB Hounslow's Local Plan objectives for Brentford	GWC IIA	Community groups (Brentford Voice)	The IIA tested all development proposals that are in the Local Plan Review.
Concern raised in relation to the provision of additional health facilities floorspace as outlined in the IDP to support growth. The Plan should specify where this will be provided and where funding will be found.	IDP	Community groups / individuals / Hounslow CCG	The Council has produced an Infrastructure Delivery Plan (IDP) to support development growth in the Local Plan Reviews to meet our statutory requirement/target for homes and jobs in the borough. The primary purpose of the IDP is to identify infrastructure including

			health infrastructure (such as hospital/GP surgeries) that are considered necessary to support the growth proposed in the borough over a the 15 year plan period, and to outline how and when this will be delivered. The IDP was developed by working with infrastructure providers for the borough and plays a key role in demonstrating that planned growth can be accommodated in a sustainable manner, through the timely and coordinated delivery of critical and strategic infrastructure.
Issues raised in relation to the commissioning of the Green Belt Review and the methodology undertaken for the study.	Green Belt Review, Stages 1 & 2	Individual (C. Hern)	The Green Belt Assessment was an independent study whose findings have been subject to full consultation. There is no specified methodology for undertaking Green Belt Reviews set out in national guidance, but the approach undertaken by Arup was robust and consistent with good practice elsewhere. The Council does not consider that the approach taken to the interpretation of 'neighbouring towns' is unsound. The study has recognised the some of the areas identified as weakly performing running through the centre of the borough are still areas of valued open space which merit continued protection. Similarly, the Council does not consider the retention of areas of Green Belt in Heston and Cranford is unsound. The approach has been led by the need to demonstrate exceptional circumstances for any boundary changes.

## Appendix A: Regulation 18 Issues Consultation Materials

*Press Notice text for Call for site 2016*

### **Hounslow Borough Council Local Plan Review: Call for Sites (2016)**

Hounslow Borough Council are undertaking a review of the adopted Local Plan. As part of this process we are inviting public, private, voluntary bodies and individuals to submit potential development sites for consideration in our Call for Sites (2016).

We are particularly interested in sites that:

- Would be available for development within the next 20 years.
- Where the developable site exceeds 0.2 hectares (2,000 sqm).
- Are capable of delivering five or more dwellings.

If individuals or organisations would like to submit potential development site(s) for consideration please complete a submission form for each site for which you wish to submit details. Submissions should include a site location plan at an appropriate scale, clearly showing the extent of site boundaries.

The Call for Sites 2016 submission form can be accessed from our planning policy webpages at the following location:

[http://www.hounslow.gov.uk/index/environment\\_and\\_planning/planning/planningpolicy/local\\_plan.htm](http://www.hounslow.gov.uk/index/environment_and_planning/planning/planningpolicy/local_plan.htm)

Alternatively, you can contact us via e-mail at [ldf@hounslow.gov.uk](mailto:ldf@hounslow.gov.uk) to request a copy of the submission form.

To ensure the inclusion of your site submissions should be received no later than 7th October 2016.

Submissions cannot be treated as confidential and will be made publically available. All sites that are submitted will be attributed by name and/or organisation only.

Completed forms should be returned to:

[ldf@hounslow.gov.uk](mailto:ldf@hounslow.gov.uk)

or to:

Planning Policy  
London Borough of Hounslow  
Civic Centre  
Lampton Road  
Hounslow  
TW3 4DN

For enquiries, please contact:

E-mail: [ldf@hounslow.gov.uk](mailto:ldf@hounslow.gov.uk)

Tel:020 8583 5202

## Letter to Library Staff

Dear Library Staff,

Please find included a copy of each of the Great West Corridor Plan and West of Borough Plan Issues Consultation papers. These are currently out for public consultation and the Council is inviting responses from the public until mid-February. If possible it would be great if these could be displayed in the library, however, if this is not possible they need to be provided for reference if people ask for them.

Please keep these documents until at least close of business on Friday 26 February. If people request them after this date please direct them to the Planning Policy page on the website where we will have updated our progress on the plan.

The issues consultation papers are intended to set out areas for discussion and prompt people to start thinking about what is important in the two areas. Their comments will help us develop two plans which will inform area specific reviews of the Local Plan (adopted September 2015).

### **Useful information**

- Closing date for comments is **Monday 22 February 2016 at 5pm**
- Comments can be submitted by email to [ldf@hounslow.gov.uk](mailto:ldf@hounslow.gov.uk) or by post to Local Plan Review, Planning Policy, Civic Centre, Lampton Road, Hounslow TW3 4DN
- There are questionnaires available on the website which we are encouraging people to use
- Documents can be found by using the 'Have your say – consultations' button on the Council's homepage [www.hounslow.gov.uk](http://www.hounslow.gov.uk)
- PDF copies of the Council's evidence documents referred to within the issues papers are available online  
[www.hounslow.gov.uk/index/environment\\_and\\_planning/planning/planningpolicy/local\\_plan/evidence\\_research.htm](http://www.hounslow.gov.uk/index/environment_and_planning/planning/planningpolicy/local_plan/evidence_research.htm)
- For more information contact the Planning Policy team on 020 8583 5202 or by using [LDF@hounslow.gov.uk](mailto:LDF@hounslow.gov.uk)
- These documents fulfil Council's requirements under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012
- This consultation includes a 'Call for Sites' which means people can submit sites they think should be designated for a specific use. This might include for housing, education, leisure etc.

Please also find included Hounslow's Local Plan which was adopted by Council in September 2015. This is for reference and to be retained by the library.

Please feel free to contact Louise Prew if you have any further questions on 020 8583 4526 or email [Louise.Prew@hounslow.gov.uk](mailto:Louise.Prew@hounslow.gov.uk)

Regards

**Planning Policy**

London Borough of Hounslow

**Example of letter sent to consultees:**

Sir/ Madam

XXXXXXXXXX

XXXXXX

Hounslow

Middlesex

XXXXXXXXXX

XXXXXXXXXX

**Director of Regeneration,  
Economic Development and  
Environment**

Civic Centre  
Lampton Road  
Hounslow TW3 4DN

Your contact: Planning Policy  
Direct Line: 020 8583 5202

E-Mail: LDF@hounslow.gov.uk

Our ref: Local Plan review

Date: 18 December 2015

Dear Sir or Madam

**London Borough of Hounslow Local Plan review - Great West Corridor Plan Issues Consultation and West of Borough Plan Issues Consultation**

**Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012**

The Council recently adopted the London Borough of Hounslow Local Plan which forms part of the statutory development plan for the borough and provides an over-arching planning strategy until 2030. It requires two Local Plan reviews to be quickly produced that will focus on two specific areas of the borough:

- [Great West Corridor](#)
- [West of the Borough](#)

The Council has prepared two Issues Consultation documents focusing on these two areas. They represent the first stage in the plan making process and have been produced in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Great West Corridor and West of Borough Issues Consultation documents provide the opportunity for key stakeholders to shape the content of the Plan from the outset, before policies start to be drafted. They set out some of the key issues, including the need for houses, for jobs, green belt and the importance of new transport connections affecting these areas along with questions for discussion. We want to hear your views on these issues. However if you think we have missed something important, please tell us.

As part of this consultation, the Council is carrying out a 'Call for Sites' so site owners, businesses and residents in the area can provide their own views and put forward sites on which sites should be included in the Local Plan review.

## How to get involved

This consultation is open until **Monday 22nd February 2016**. Please ensure we have received your responses by **5pm** on this day.

Comments should preferably be made using the online Word document questionnaires provided (although comments by any means will be accepted).

These should be returned by:

**E-mail:** [LDF@hounslow.gov.uk](mailto:LDF@hounslow.gov.uk)

**Post:** Planning Policy, Local Plan review, Civic Centre, Lampton Road, Hounslow, TW3 4DN

Copies of the documents can be viewed:

- On the [Council's website](#)
- at all borough libraries  
[www.hounslow.gov.uk/index/leisure\\_and\\_culture/libraries/libraries\\_local.htm](http://www.hounslow.gov.uk/index/leisure_and_culture/libraries/libraries_local.htm)
- at the Council's Reception, Civic Centre, Lampton Road, Hounslow, TW3 4DN, during normal opening hours

Copies can also be obtained by contacting the Planning Policy Team on 020 8583 5202 who will also be happy to answer any questions you may have.

Yours sincerely



**Alan Hesketh**

**Head of Regeneration, Spatial Planning & Economic Development**

**If you no longer wish to receive notifications regarding planning policy documents being prepared by the council, or wish to update your contact details, please contact us at [LDF@hounslow.gov.uk](mailto:LDF@hounslow.gov.uk).**



**London Borough  
of Hounslow**

# **QUESTIONNAIRE**

## **Great West Corridor Plan consultation**

We would like your views on the issues consultation paper for the Great West Corridor Plan, a partial review of the Local Plan. This plan will provide a vision of the area along the A4 known as the 'Golden Mile' over the next 15 years and provide for more employment and housing. At this stage we want you to have your say to help us decide what is most important in the Great West Corridor and to help us come up with solutions for the issues identified.

This consultation includes a **call for sites**. Please nominate any sites you think would be suitable for development. These may be for housing, employment, leisure or other uses.

Consultation is open until **Monday 22 February 2016**. Please ensure we receive your comments by **5pm** on this day.

Comments should be returned by email: [LDF@hounslow.gov.uk](mailto:LDF@hounslow.gov.uk)

Or post:

Local Plan consultation  
Planning Policy  
Civic Centre, Lampton Road  
Hounslow  
TW3 4DN

The issues document and further information can be found on our website:  
[www.hounslow.gov.uk/](http://www.hounslow.gov.uk/).

This consultation is being carried out in line with regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. All responses to this consultation will be considered in the drafting of the next stages of the plan.

### **Contact details<sup>4</sup>**

Name:

Organisation (if responding on behalf of):

Email:

Address:

Please tick if you would like to be:

---

<sup>4</sup> Please note comments will be published. All personal details (except your name and organisation) will be removed.

- kept informed on the progress of this plan?
- added to the council's planning consultation database?

## Questions

We have identified eleven issues which we believe are important in the Great West Corridor. Each is listed below with questions to help you respond to the plan.

### **Issue 1: The study area and the extent of the Great West Corridor**

1. Are there any other areas which you feel should be added to or removed from the plan area shown? If so, please provide a plan showing the area.
  
2. Do you agree with the areas of transformation and consolidation?

### **Issue 2: Strategic Vision and key diagram for the Great West Corridor**

3. What do you like and dislike about the area?
  
4. Are there additional priorities, the Council should be focussing on in the scope and content of the vision for the Great West Corridor?

### **Issue 3: Achieving economic and employment growth**

5. Do you think the digital and media sector should be prioritised in the Great West Corridor? If so, what can the Council do to support and encourage growth and spin off benefits?
  
6. Do you think other industrial uses, such as those along Transport Avenue, should remain a part of the employment mix in the corridor?
  
7. If you work in the Great West Corridor, in what location do you work? What do you like or dislike about working in the area?

**Issue 4: Creating new strategic transport connections and improving ease of movement around the area**

8. What should be the priorities for improving access to and from the area?
9. Which of the listed projects (or other ideas you have) should be the priority??
10. What do you think are the main barriers to movement within the area?

**Issue 5: Achieving additional housing growth**

11. Should we look at the Great West Corridor as a location that could further help meet the borough's housing supply?
12. What sort of housing would you like to see here?
13. How can we better plan for housing and employment space to coexist?

**Issue 6: Environmental quality and enhancing open space**

14. What do you consider to be the main environmental issues in the corridor?
15. Do you think development in the Great West Corridor would benefit from further policies and guidance to address environmental issues, beyond those already in the Local Plan?
16. What would the priorities for enhancing open space be if resources were available?

**Issue 7: Promoting high quality design and conserving heritage**

17. How can we respect the historic context of the Great West Road whilst providing the potential for growth?
18. What are the most significant aspects of the surrounding heritage assets and how best can these be conserved?
19. Have we identified the right constraints on sites for tall buildings (please see Design and conservation background paper with further questions)?

**Issue 8: Community infrastructure and local services**

20. What will the corridor need to support the growth in employment and housing?
21. How and where can new school places be provided?

**Issue 9: The need for an Interim Planning Framework for the Kew Gate area**

22. Do you have any comments on the Interim Planning Framework, the design principles it contains or the evidence documents it is based upon?
23. What aspects of the Interim Planning Framework should we take forward into the Local Plan review?

**Issue 10: Making it happen**

24. Do you think any of the Local Plan site allocations should be changed?
25. Do you think any further sites in the corridor should be allocated too? For each site please provide reasons and if appropriate a map.

26. What planning 'tools' would help implement the Plan, in particular the 'game changing' transport proposals?

**Thank you for taking the time to have your say**



**London Borough  
of Hounslow**

# QUESTIONNAIRE

## West of Borough Plan consultation

We would like your views on the issues consultation paper for the West of Borough Plan, a partial review of the Local Plan. This plan will provide for more houses and jobs in Cranford & Heston, Hounslow West, Hanworth, Feltham and Bedfont. At this stage we want you to have your say to help us decide what is most important to people in the West of the Borough and to help us come up with solutions for the issues identified.

This consultation includes a **call for sites**. Please nominate any sites you think would be suitable for development. These may be for housing, employment, leisure or other uses.

Consultation is open until **Monday 22 February 2016**. Please ensure we receive your comments by **5pm** on this day.

Comments should be returned by email: [LDF@hounslow.gov.uk](mailto:LDF@hounslow.gov.uk)

Or post:

Local Plan consultation  
Planning Policy  
Civic Centre, Lampton Road  
Hounslow  
TW3 4DN

The issues document and further information can be found on our website:  
[www.hounslow.gov.uk/](http://www.hounslow.gov.uk/).

This consultation is being carried out in line with regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. All responses to this consultation will be considered in the drafting of the next stages of the plan.

### Contact details<sup>5</sup>

Name:  
Organisation (if responding on behalf of):  
Email:  
Address:

---

<sup>5</sup> Please note comments will be published. All personal details (except your name and organisation) will be removed.

Please tick if you would like to be:

- kept informed on the progress of this plan?
- added to the council's planning consultation database?

## Questions

We have identified eleven issues which we believe are important in the West of the Borough. Each is listed below with questions to help you respond to the plan.

### Issue 1: The plan area boundary and the West of Borough Plan

1. Are there any other areas which you feel should be added to or removed from the proposed Plan area shown? If so please provide a plan showing the area.
2. It is proposed that the London Borough of Hounslow part of the Opportunity Area will be drafted once the scope for change and growth has been more clearly established at the next plan making state. In the meantime, do you have any comments on the definition of the Heathrow Opportunity Area?

### Issue 2: Developing a strategic vision for the West of the Borough

3. How can we tailor the borough wide vision to be specific for the West of the Borough?
4. Are there additional priorities Council should be focussing on for the vision in the West of the Borough?

### Issue 3: Reviewing the Metropolitan Green Belt

5. Do you think all the Green Belt in Hounslow is fit for purpose and meets the purposes and objectives set out on the NPPF? If not please identify the areas that do not.
6. Under what circumstances should Green Belt land be re-designated for other uses?
7. Do you think that, if some Green Belt land is released for other uses now, it should be compensated for by designating other areas as Green Belt?

## **Issue 4 Impact of Heathrow on the West of the Borough**

### **Issue 4(a): Employment related to Heathrow Airport**

8. What sort of employment and space opportunities should be created, and for which types of jobs, building and businesses?
  
9. Does the presence of the Airport provide, in itself, give sufficient justification to allow certain types of hotel to locate at or very near the Airport instead of at the preferred location in town centres?

### **Issue 4 (b): Surface access to the Airport and local movements around the area**

10. Do you support the Council's idea of the Southern Rail Access to Heathrow, with a new Station at Clockhouse roundabout? What do you think there would be the main benefits and difficulties to resolve?
  
11. Do you think there would be benefits for a major new access to the Airport from the south? If so what would they be?
  
12. How could local transport services best be designed so that local residents and businesses could benefit for their own local journeys from these improvements too?

### **Issue 4(c): Noise and Pollution**

13. What planning controls and measures would you like to see put in place to address and resolve the impacts of noise from aircraft and Airport related development in the future?
  
14. What environmental benefits could the Airport help create for the area? Do you have any ideas or proposals?

## **Issue 5: Accommodating housing needs**

15. In light of the housing need in the borough, do you think more housing land should be sought in the West of the Borough over and above that identified in the current Local

Plan? Do the Heathrow New Garden City vision and Feltham Masterplan offer useful potential to achieve this?

16. How should the need for new housing provision be balanced against considerations such as the role of the Metropolitan Green Belt and the supply of local services and utilities?

17. What sort of housing would you like to see here?

#### **Issue 6: Creating employment opportunities locally**

18. Are new jobs needed in the West of the Borough, if so what type of jobs?

19. Does the Heathrow New Garden City vision offer a sound approach to provide for the needs of growth in the area to meet new and existing businesses needs?

#### **Issue 7: Enhancing the natural environment and open space**

20. Do you feel that the level of open space available for recreation and retreat from the urban elements of the West of the Borough are sufficient for your needs? How can these spaces be improved?

21. Does the availability of local play spaces and amenity spaces for you and your family meet your needs in the community in which you live? What type of open space is needed? How can existing spaces be improved?

22. How should the need to protect our natural and open spaces be balanced with the need for jobs and homes in the future, and the demands of future residents and employees?

#### **Issue 8: Enhancing Feltham and protecting neighbourhood centres**

23. Do the Feltham Masterplan and Heathrow New Garden City vision offer sound proposals for growth?

24. What is the role of Feltham and the other local centres in the West of the Borough and how should they be promoted and secured?

25. Do you think it is important to protect our small local centres and isolated shops that meet peoples day to day needs? Where lack of demand leads to some contraction, how should this be managed?

**Issue 9: Providing community infrastructure and local services**

26. What does community infrastructure mean to you?

27. What facilities do you think the area lacks?

28. What do you think the Plan should provide?

**Issue 10 Promoting high quality urban design and conserving heritage**

29. How can we best respect the history and best of local character and context of the West of the Borough whilst providing the potential for growth?

30. What important 'designated' and 'non-designated' heritage assets do you think we should do more to celebrate?

**Issue 11 Making it Happen**

31. Do you think any of the Local Plan site allocations should be changed?

32. Do you think any other sites should be allocated? For each site please provide reasons and, if appropriate, a map.

33. What planning 'tools' would help implement the Plan?

**Anything else?**

34. Is there anything else you think it is important to mention?

**Thank you for taking the time to have your s**

## Appendix B: Regulation 18 Preferred Options Consultation Materials

### Extract of Press Release for Regulation 18 Local Plan Reviews Consultation



# News Release

PR 8830  
For Immediate Release

17 October 2017

### **Hounslow residents invited to help shape development and regeneration**

Residents are being invited to have their say on exciting plans for development and regeneration in the West of Borough and the Great West Corridor.

Hounslow Council is hosting a consultation from Monday 23 October to Sunday 10 December on the Local Plan Review and inviting the community to comment on where new homes will be built, jobs created, green areas improved and the generation of new public spaces.

The Local Plan Review will help shape the future of the Great West Corridor and West of Borough areas for the next 15 years. It includes:

- An overall vision for the West of Borough and the Great West Corridor
- Policies regarding space and addressing specific issues in the area
- Place policies for areas where regeneration and growth will be the focus
- Minor amendments to the existing Local Plan 2015
- The identification of potential development sites

The West of Borough area forms part of the Heathrow Opportunity Area and the Great West Corridor area has been identified as one of the new Opportunity Areas in the emerging London Plan - the Mayor of London, Sadiq Khan's proposal for significant business growth and housing development with improved public transport access.

This is the second stage of consultation for the Local Plan Review particularly for West of Borough and Great West Corridor areas (Preferred Options Consultation).

The aim is to support opportunities for housing delivery, job creation and the provision of new infrastructures to serve the local community and new development.

The plans also support the delivery of a new Southern Rail Access into Heathrow Airport in the West of Borough and proposes new passenger services from the Great West Corridor to Southall Crossrail station and Old

Oak Common (Crossrail and HS2).

This transport infrastructure will radically re-position these areas and enhance public transport accessibility.

There are a number of ways in which residents can find out about the plan and comment on it.

Drop-in sessions and workshops will be taking place on the following dates:

Thursday 26 October 2017- Feltham Library, The Piazza, The Centre, Feltham, TW13 4GU

- Drop in session - 5pm to 7pm
- Workshop - 6pm to 7pm

Monday 6 November 2017 - 5pm to 7pm - Feltham Library, The Piazza, The Centre, Feltham, TW13 4GU

- Drop in session- 5pm to 7pm
- Workshop - 6pm to 7pm

Councillor Steve Curran, Leader of Hounslow Council and Cabinet Member for Regeneration, said: "It's extremely important we get the views of our residents on the Local Plan Review, as we want to ensure that regeneration and development enhances local people's lives.

"We will read and analyse every comment our residents make and will use it to inform the next version of the Local Plan Review due for consultation in Summer 2018.

"We have a fantastic opportunity to grow and develop further as a borough and this is just one way of doing this.

"Please give us your views, as we look to shape a positive future for you, our residents, in the issues that matter including new homes, jobs and better transport facilities amongst others."

To view and give a comment, please visit

[https://www.hounslow.gov.uk/info/20096/consultations/1769/local\\_plan\\_review](https://www.hounslow.gov.uk/info/20096/consultations/1769/local_plan_review)

#### Media Enquiries

Laura Burkin | Senior Communications Officer  
London Borough of Hounslow  
Office: 020 8583 6590

London Borough of Hounslow  
Civic Centre  
Lampton Road  
Hounslow  
Middlesex TW3 4DN

FOR OUT OF HOURS ENQUIRIES OR EMERGENCIES PLEASE CALL  
THE DUTY COMMUNICATIONS MANAGER ON 07811 235 545

Tel: 020 8583 2000

[www.hounslow.gov.uk](http://www.hounslow.gov.uk)

Follow us online: Twitter: @LBofHounslow and Facebook:

[www.facebook.com/HounslowCouncil](https://www.facebook.com/HounslowCouncil)

[www.hounslow.gov.uk](http://www.hounslow.gov.uk)

*Published link:*

[https://www.hounslow.gov.uk/news/article/316/hounslow\\_residents\\_invited\\_to\\_help\\_shape\\_development\\_and\\_regeneration](https://www.hounslow.gov.uk/news/article/316/hounslow_residents_invited_to_help_shape_development_and_regeneration)

## Extracts of Articles/Social Media Promotion for GWC and WoB (Regulation 18) Local Plan Reviews

### ***EVOLVE Article:***



We are working on the Local Plan Reviews for the Great West Corridor and West of Borough and getting them prepared for the formal consultation in February/March-April 2019.

Prior to formal consultation, we have organised pre-consultation engagement drop in sessions to share with you:

- what you told us during the previous consultation at the end of 2017
- how we took your comments forward and what we are proposing in the draft plans.

The drop-in sessions are both a chance for you to see how we have incorporated your feedback, and also the last chance to have your say on the draft plan before the formal consultation next year.

### **The dates and details of the sessions are as follows:**

#### **Great West Corridor Residents and Community Group Drop-in session and workshop**

Thursday 24<sup>th</sup> January 2019

Brentford Free Church,

3pm –8pm

#### **West of Borough Residents and Community Group Drop-in session and workshop**

Thursday 31<sup>st</sup> January 2019

The Hub, Feltham Library


3pm –8pm

This is a wonderful opportunity for you get involved with the Local Plan and learn about the proposals coming forward, as well as giving any final feedback to us.

If you have any queries regarding the Local Plan Reviews, please contact the Spatial Planning and Infrastructure Team at [LDF@hounslow.gov.uk](mailto:LDF@hounslow.gov.uk)

**Twitter post (extract):**

**Hounslow Council** @LBofHounslow · Oct 17  
#Hounslow residents are invited to help shape development and regeneration - [goo.gl/uEXz2H](https://goo.gl/uEXz2H)



Steve Curran

1 4 2

4 Retweets 2 Likes











Steve Curran

1 4 2

Tweet your reply

**GreenFeltham project** @GreenFeltham · Oct 17  
Replying to @LBofHounslow @CllrSteveCurran  
Residents want to shape the plans. Why have large parts of West Area been excluded?

2

- Today (2 messages)
- ▶ **3:50pm**  **2 messages** Have your say on exciting plans for development & regeneration in the west of the borough & the Great West Corridor: [goo.gl/GvMrfP](http://goo.gl/GvMrfP)  
To London Borough of Hounslow +1 by hounslowcouncil
- 
- Thursday, Oct 26 (4 messages)
- ▣ **10:15am**  Applications to transfer to secondary school in September 2018 will close on 31 October 2017. Complete your child's application online - [goo.gl/Bvmvap](http://goo.gl/Bvmvap)  
by hounslowcouncil
  - ▶ **1:30pm**  **2 messages** New cycling training sessions for ages 3 and up. Training sessions take place on 30 October. Book & find out more: [goo.gl/GXAYTQ](http://goo.gl/GXAYTQ)  
To London Borough of Hounslow +1 by hounslowcouncil
  - ▣ **5:00pm**  Applications to transfer to secondary school in Sep 18 will close on 31 Oct 17. Complete your application online: [goo.gl/Bvmvap](http://goo.gl/Bvmvap)  
by hounslowcouncil
- 
- Friday, Oct 27 (4 messages)
- ▶ **9:30am**  **2 messages** New cycling training sessions for ages 3 and up. Training sessions take place on 30 October. Book & find out more: [goo.gl/GXAYTQ](http://goo.gl/GXAYTQ)  
To London Borough of Hounslow +1 by hounslowcouncil
  - ▶ **2:15pm**  **2 messages** Have your say on exciting plans for development & regeneration in the west of the borough & the Great West Corridor: [goo.gl/GvMrfP](http://goo.gl/GvMrfP)  
To LBoHounslow +1 by hounslowcouncil
- 
- Saturday, Oct 28 (2 messages)
- ▶ **5:00pm**  **2 messages** We want your views on where new homes will be built, jobs, green areas improvement for the Local Plan Review : [goo.gl/GvMrfP](http://goo.gl/GvMrfP)  
To LBoHounslow +1 by hounslowcouncil
- 
- Tuesday, Oct 31 (2 messages)
- ▶ **10:30am**  **2 messages** Have your say on exciting plans for development & regeneration in the west of the borough & the Great West Corridor: [goo.gl/GvMrfP](http://goo.gl/GvMrfP)  
To London Borough of Hounslow +1 by hounslowcouncil
- 
- Thursday, Nov 2 (2 messages)
- ▶ **9:15am**  **2 messages** We want your views on where new homes will be built, jobs, green areas improvement for the Local Plan Review : [goo.gl/GvMrfP](http://goo.gl/GvMrfP)  
To London Borough of Hounslow +1 by hounslowcouncil on Wednesday, Oct 25 2017 at 1:51pm
- 
- Sunday, Nov 5 (2 messages)
- ▶ **4:30pm**  **2 messages** We want your views on where new homes will be built, jobs & new public spaces for the Local Plan Review : [goo.gl/GvMrfP](http://goo.gl/GvMrfP)

**Facebook page (extract):**

 **London Borough of Hounslow** ...  
Published by Saadiq Cornelius (?) · 17 October at 17:30 · €

Residents are being invited to have their say on exciting plans for development and regeneration in the west of the borough and the Great West Corridor.

Hounslow Council is hosting a consultation from Monday 23 October to Sunday 10 December on the Local Plan Review and inviting the community to comment on where new homes will be built, jobs created, green areas improved and new public space created.

The Local Plan Review will help shape the future of Great West Corridor and W... [See more](#)



 2,170 people reached

[Boost Post](#)

 Like

 Comment

 Share



  Beverley Anne Slade and Saj Butt

Chronological ▾

1 share

### **Example of email sent to consultees:**

**From:** Danalee Edmund

**Sent:** 23 October 2017 18:51

**Subject:** London Borough of Hounslow Local Plan review Preferred Options Consultations and Brentford East SPD Consultation

Dear Consultees,

### **Re: Local Plan review Preferred Options consultations and Brentford East SPD Consultation**

The Council is undertaking a Local Plan Review Preferred Options consultation for the Great West Corridor and the West of Borough areas, and amendments to the existing Local Plan, in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. In addition, the Council is consulting on the Draft Brentford East Supplementary Planning Document. These consultations will run **from Monday 23<sup>rd</sup> October until midnight Sunday 10<sup>th</sup> December 2017.**

### **Local Plan review**

The Local Plan Review Preferred Options Consultation represents the next step in the plan making process following an Issues Consultation in 2016. It sets out the Council's proposals for the future development mainly in West of Borough and Great West Corridor over the next 15 years, through a suite of new policies.

The West of Borough area forms part of the Heathrow Opportunity Area and the Great West Corridor area has been identified as one of the new Opportunity Areas in the emerging London Plan. The Mayor of London has designated Opportunity Areas for significant business growth and housing development with improved public transport access. The Council is now inviting the public to have their say and help shape the plans for these areas.

The Local Plan Review consultation documents are available to view on the Council's website at the below address:

[https://www.hounslow.gov.uk/info/20034/planning\\_policy/1545/local\\_plan\\_-\\_reviews](https://www.hounslow.gov.uk/info/20034/planning_policy/1545/local_plan_-_reviews)

## **Draft Brentford East Supplementary Planning Document (SPD)**

The Draft Brentford East Supplementary Planning Document (SPD) seeks to provide more detailed planning and design guidance for new development within the 'Brentford East' area (the area on the Great West Road, around Kew Bridge station between Gunnersbury Park and the River Thames).

As the Local Plan review process follows a lengthy statutory process, Plan proposals (which will be subject to change following consultation) for the Great West Corridor are not expected to be adopted by the Council until 2019. The SPD is needed due to current development pressure to provide interim guidance to ensure that development comes forward in a coordinated manner and is of a high-quality design. Consultation on the SPD will run in parallel with the Local Plan review, **from Monday 23<sup>rd</sup> October until midnight Sunday 10<sup>th</sup> December.**

The Brentford East SPD consultation documents are available to view on the Council's website at the below address

[https://www.hounslow.gov.uk/info/20096/consultations/1778/draft\\_brentford\\_east\\_supplementary\\_planning\\_document\\_spd\\_-\\_ends\\_sun\\_1\\_nov\\_2017](https://www.hounslow.gov.uk/info/20096/consultations/1778/draft_brentford_east_supplementary_planning_document_spd_-_ends_sun_1_nov_2017)

### **How to get involved**

As stated above, these consultations will run **from Monday 23<sup>rd</sup> October until midnight Sunday 10<sup>th</sup> December.**

**On-line:** Comments should preferably be made using the online questionnaires (although comments by any means will be accepted)

- On the Council's website  
[https://www.hounslow.gov.uk/info/20096/consultations/1769/local\\_plan\\_review\\_-\\_ends\\_fri\\_1\\_dec\\_2017](https://www.hounslow.gov.uk/info/20096/consultations/1769/local_plan_review_-_ends_fri_1_dec_2017)

[https://www.hounslow.gov.uk/info/20096/consultations/1778/draft\\_brentford\\_east\\_supplementary\\_planning\\_document\\_spd\\_-\\_ends\\_sun\\_1\\_nov\\_2017](https://www.hounslow.gov.uk/info/20096/consultations/1778/draft_brentford_east_supplementary_planning_document_spd_-_ends_sun_1_nov_2017)

**E-mail:** [LDF@hounslow.gov.uk](mailto:LDF@hounslow.gov.uk)

**Post:** Planning Policy, Local Plan review, Civic Centre, Lampton Road, Hounslow, TW3 4DN

**Copies of the documents can be viewed:**

- at all Borough libraries  
<https://www.hounslow.gov.uk/libraries>
- at the Council's Reception, Civic Centre, Lampton Road, Hounslow, TW3 4DN, during normal opening hours

Yours sincerely



**Alan Hesketh**

**Head of Regeneration, Spatial Planning & Economic Development**

If you no longer wish to receive notifications regarding planning policy documents being prepared by the Council, or wish to update your contact details, please contact us at [LDF@hounslow.gov.uk](mailto:LDF@hounslow.gov.uk).

## Questionnaires

# West of Borough Local Plan Review— Preferred Options Consultation Questionnaire

---

### **Vision and Strategic Objectives (Chapter3)**

Question 1: Do you agree with the Spatial Vision for the West of Borough.

Question 2: Do you agree with the Strategic Objectives for the West of Borough.

### **Spatial Policies (Chapter 4)**

#### **Housing Growth (from page 42)**

Question 3: Do you agree with the Housing Growth preferred policy option? If not, what would you change?

Question 4: Do you agree with the initial proposed capacity for new homes? If not, do you think they are too high or too low, while still ensuring that Hounslow's housing need is met?

Question 5: In addition to the sites identified in figure4.3 of the Draft Local Plan Review, are there any further sites that could be brought forward to deliver housing in the plan period?

Question 6: Are there any additional or alternative policies that the Council should consider in relation to Housing Growth?

#### **Employment Growth (from page 48)**

Question 7: Do you agree with the Employment Growth preferred policy option? If not, what would you change?

Question 8: Do you agree with the initial proposed capacity for new jobs? If not, how could these be amended, while still ensuring that the demand for employment space is met?

Question 9: Are there any additional or alternative policies that the Council should consider in relation to Employment Growth?

#### **Design and Heritage (from page 54)**

Question 10: Do you agree with the Design and Heritage preferred policy option? If not, what would you change?

Questions 11: Do you agree with the Design and Heritage preferred policy option which aims to prevent new development from over dominating its surroundings or being out of context?

Questions 12: Do you agree with the preferred policy option for landmark buildings (figures 4.6 and 4.7)?

Question 13: Are there any additional or alternative policies that the Council should consider in relation to Design and Heritage?

### **Green Belt, MOL and Open Space (from page 62)**

Question 14: Do you agree with the Green Belt, Metropolitan Open Land (MOL) and Open Space preferred policy option? If not, what would you change?

Question 15: Do you agree with the preferred policy seeking compensation for the loss of Green Belt by enhancing other open spaces in the area?

Question 3: Are there any other policy alternatives that could replace the Green Belt MOL and Open Space preferred policies?

### **Transport and Connectivity (from page 70)**

Question 16: Do you agree with the Transport and Connectivity preferred policy options? If not, what would you change?

Question 17: Do you have any suggestions for how sustainable forms of travel (e.g., rail, bus, walking and cycling) could be developed in the future to serve the West of Borough?

Question 18: Are there any additional or alternative policies that the Council should consider in relation to Transport and Connectivity?

### **Health and Wellbeing (from page 76)**

Question 19: Do you agree with the Health and Wellbeing preferred policy options? If not, what would you change?

Question 20: Do you have any suggestions for how to encourage people to be more physically active?

Question 21: Are there any additional or alternative policies that the Council should consider in relation to Health and Wellbeing?

### **Places Policies (Chapter 5)**

Question 22: Are there any additional places that could be added to better reflect existing character areas or respond to regeneration and future development?

### **Feltham Neighbourhoods (from page 84)**

Question 23: Do you agree with the approach set out in the Feltham Neighbourhoods preferred policy option? If not, what would you change?

Question 24: Are there other land uses that could be supported in this place?

### **Bedfont Lakes Neighbourhoods (from page 92)**

Question 25: Do you agree with the approach set out in the Bedfont Lakes Neighbourhoods preferred policy option? If not, what would you change?

Question 26: Are there other land uses that could be supported in this place?

**P3 Heathrow Gateway (from page 100)**

Question 27: Do you agree with the approach set out for the Heathrow Gateway preferred policy option? If not, what would you change?

Question 28: Are there other land uses that could be supported in this place?

**Airport Business Park (from page 106)**

Question 29: Do you agree with the approach set out for the Heathrow Gateway preferred policy option? If not, what would you change?

Question 30: Are there other land uses that could be supported in this place?

**Cranford and Heston (from page 112)**

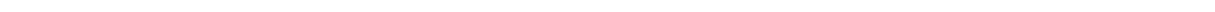
Question 31: Do you agree with the approach set out for this preferred Cranford and Heston Place policy option? If not, what would you change?

Question 32: Are there other land uses that could be supported in this place?

**Site Allocations (Appendix 1)**

Do you agree with the proposals in the site allocations? If not what would you change

In addition to the site allocations identified in Appendix 1, are there any further sites that could be brought forward?



# Great West Corridor Local Plan Review - Preferred Options Consultation Questionnaire

---

## **Vision and Strategic Objectives (Chapter 3)**

Question 1: Do you agree with the Spatial Vision for the Great West Corridor?

Question 2: Do you agree with the Strategic Objectives for the Great West Corridor?

## **Employment Growth (from page 40)**

Question 3: Do you agree with the Employment Growth preferred policy option? If not, what would you change?

Question 4: Do you agree with the initial indicative capacity for new jobs? If not, how could these be amended, while still ensuring that the demand for employment are met.

Question 5: Are there any additional or alternative policies that the Council should consider in relation to Employment Growth?

## **Housing Growth (from page 46)**

Question 6: Do you agree with the Housing Growth preferred policy option? If not, what would you change?

Question 7: Do you agree with the initial proposed capacity for new homes? If not, do you think they are too high or too low, while still ensuring that Hounslow's housing need is met.

Question 8: In addition to the sites identified in figure 4.3 of the Draft Local Plan Review are there any further sites that could be brought forward to deliver housing in the plan period?

Question 9: Are there any additional or alternative policies that the Council should consider in relation to Housing Growth?

## **Design and Heritage (from page 52)**

Question 10: Do you agree with the Design and Heritage preferred policy option? If not, what would you change?

Question 11: Do you agree with the Design and Heritage preferred policy option which aims to manage the impact of new development, including tall buildings and ensure that new development contributes positively to its surroundings?

Question 12: Do you agree with the preferred policy option for landmark buildings identified in figure 4.4.

Question 13: Are there any additional or alternative policies that the Council should consider in relation to Design and Heritage?

### **Environmental Quality and Open Space (from page 60)**

Question 14: Do you agree with the Environmental Quality and Open Space preferred policy option?

If not, what would you change?

Question 15: Do you have any suggestions for how noise and air pollution could be reduced and mitigated in the Great West Corridor?

Question 16: Are there any additional or alternative policies that the Council should consider in relation to Environmental Quality and Open Space?

### **Transport and Connectivity (from page 66)**

Question 17: Do you agree with the Transport and Connectivity preferred policy options? If not, what would you change?

Question 18: Do you have any suggestions for how sustainable forms of travel (e.g., rail, bus, walking and cycling) could be developed in the future to serve the Great West Corridor?

Question 19: Are there any additional or alternative policies that the Council should consider in relation to Transport and Connectivity?

## **Places Policies (Chapter 5)**

### **Great West Corridor – West (from page 76)**

Question 20: Do you agree with the approach set out in the Great West Corridor West preferred policy option? If not, what would you change?

Question 21: Are there other land uses that could be supported in this place?

### **Great West Corridor - Central (from page 84)**

Question 22: Do you agree with the approach set out in the Great West Corridor Central preferred policy option? If not, what would you change?

Question 23: Are there other land uses that could be supported in this place?

### **Great West Corridor – East (from page 92)**

Question 24: Do you agree with the approach set out in the Great West Corridor East preferred policy option? If not, what would you change?

Question 25: Are there other land uses that could be supported in this place?

### **Site Allocations (Appendix 1)**

Do you agree with the proposals in the site allocations? If not what would you change

In addition to the site allocations identified in Appendix 1, are there any further sites that could be brought forward?

## Appendix C: Regulation 18 Preferred Options Consultation Detailed Summaries

### Detailed summary of the consultation responses on the GWC Local Plan and our response to the issues raised

GWC Spatial Vision and Strategic Objectives		
Respondent	Representation Summary	Council Response
Port of London Authority (Government)	The PLA wish to be involved in discussions on future development/regeneration regarding areas of its ownership at the River Thames and around Brentford Marina and the Brentford Docks area.	Comment noted. The Council will actively engage with the PLA on any matters concerning its land around the River Thames, Brentford Marina and the Brentford Docks area.
Balfour Beatty Investments (Company)	Balfour Beatty support the Council's objective to optimise employment growth, foster and support SMEs and microbusinesses as part of mixed use developments and Council's ambition to deliver a step change in the environmental and high quality public realm to facilitate and sustain investment	Support welcomed.
Canal and Rivers Trust (Non-profit organisation )	"Canal and Rivers Trust (CRT) welcome references to rivers and waterways in Spatial Vision for the Great West Corridor, policies which support the waterway network (specifically the Grand Union Canal) and secure improvements to its environment. CRT are pleased to note that objective 7 refers to the borough's rivers, but request that the reference to Grand Union Canal is included here given that it provides a continuous link, and a well used open space."	Support welcomed. Reference to the Grand Union Canal and its importance for both connectivity and open space provision is made in Policy GWC4.
Sport England (Government)	Sport England acknowledge large number of houses proposed and recommends that the Council requires developers to demonstrate how the design of their development meets the 10 Active Design principles set out in Sport England's Active Design guidance. Sport England also recommends that the Council includes a further objective in the plan against each housing allocation to require open space and sport and recreation facilities provided on site (or an off-site contribution). This will contribute towards meeting the objectives set for Health & Wellbeing of the Borough's residents set out in the Council's Local Plan. Developers could help to contribute towards the delivery of the projects identified within the Action Plan of the Playing Pitch Strategy.	Comment noted. Strategic objectives have been updated. A new policy GWC3: Health & Wellbeing has been added to address issues highlighted, including GWC3 part o) requiring that developers contribute positively to creating high quality places that support healthy communities, and supports development which involves the retention and improvement of facilities that promote healthy lifestyles such as leisure facilities and open space (including playing pitches, and children's play spaces).

GWC Spatial Vision and Strategic Objectives		
Respondent	Representation Summary	Council Response
Brentford Community Council (Community organisation)	"The Brentford Community Council (BCC) considers that the Spatial vision should include a specific reference to Brentford Town Centre as development along the Great West Corridor can have an impact on the successful regeneration of the Town Centre, particularly in terms of retail provision. BCC raise concern over the Preferred Option vision of creating 4,800 new homes, with all the facilities required, and maximising employment space for up to 5,000 new jobs within the Opportunity Area in addition to preserving and respecting historic heritage as the document is not considered to demonstrate that there is the physical room to achieve this objective. "	Comment noted. The GWC plan is committed to improving linkages between the Opportunity Area and Brentford Town Centre through public realm enhancements and improved connectivity. Provision of additional retail is provided as part of proposed development within the GWC area in order to service local need and is not expected to negatively affect the performance of Brentford Town Centre or impact upon its regeneration. The draft submission version of the plan is Masterplan led. The Masterplan sets out in detail both the location and quantum of development on various sites - as well as the approach to tall buildings and heritage impact - throughout the GWC area, and forms part of the key evidence base for the Plan. Please also see the Site Allocations Vol.2 which includes detail on site constraints, proposed uses and capacity of individual sites.
Isleworth Properties & Access Self Storage (Company)	The Isleworth Properties & Access Self Storage support vision insofar as it aims to transform the Corridor. Welcome reference to providing a mix of employment spaces attractive to existing and potential growth sectors.	Support welcomed.
West Chiswick and Gunnersbury Society (Community organisation)	"Strong objection to the designation of the Great West Corridor (GWC) as an Opportunity Area as West Chiswick and Gunnersbury Society (WCGC) do not believe that the area can sustain the quantum or type of development such a designation entails. Particular concern raised over peripheral locations of Brentford East having to deliver high levels of development and the promotion of tall buildings within the Opportunity Area. WCGC recommend that a statement is provided within a revised introduction to the Local Plan to clarify that development in the areas covered by either Volume 3 or 4 is still subject to the over-arching policies in Volume 1. Strong endorsement for "Any significant employment growth is dependent on significant improvements in public transport to access the area."(2.16). WCGC do not believe that Objectives 3 and 4 (Optimising Housing Growth) can be met, and	"Comment noted. The Great West Corridor has been included as an Opportunity Area (OA) in the draft New London Plan given the potential to deliver a substantial amount of new homes and jobs in the area. Opportunity Areas are set by GLA and are a key component of the Mayor's spatial strategy for London. LB Hounslow must prepare the local plan reviews in accordance with the emerging London Plan. Detailed policies have been introduced to ensure that additional growth can be accommodated whilst ensuring development represents a high quality design and mitigates any adverse impacts. See policy GWC5 and GWC East place policy P3. Volumes 3 and 4 are Local Plan Reviews relating specifically to the

GWC Spatial Vision and Strategic Objectives		
Respondent	Representation Summary	Council Response
	<p>concerns are raised as to housing quality, dwelling type and mix (oversupply of studio and one-bedroom flats versus undersupply/acceptability of family houses in GWC) and affordability. Concern relating to Design and Heritage Objective 15 which appears to only address the historic environment and heritage assets within the GWC rather than the wider area. "</p>	<p>two designated opportunity areas in the borough: the GWC OA and (part of) the Heathrow OA. The Local Plan 2015 (Volume 1) will remain the main strategic planning policy document for the Borough. Ensuring that infrastructure is delivered to support growth remains a key objective of the submission version of the Plan. Please see Strategic Objective 19 and our Delivery and Monitoring Policy: GWC7 Ensuring that new housing is delivered to a high quality, at the right mix and type to meet demand and with a high proportion being genuinely affordable is key to the spatial strategy of the GWC Plan. Please see policy GW2 Housing Growth. The GWC plan has been prepared in order to protect and enhance heritage assets and promote good design both within the Corridor and in the wider area . Please see strategic objectives 12 , 13 and 14 and amended policy GW5."</p>
GLA (Government)	<p>GLA welcome the general ambition for growth expressed in the draft Great West Corridor Plan as this reflects designation in the draft new London Plan. However, GLA consider the development of housing should not undermine the functioning of the SIL and LSIS. Any redevelopment of the SIL or LSIS needs to be planned in line with emerging London Plan Policy E7. The co-location of housing within the Key Office Locations is likely to be more acceptable, but GLA request that Hounslow demonstrates how employment demand over the lifetime of the plan will be met, and how housing development will not restrict future redevelopment of employment sites.</p>	<p>Comment noted and agreed. This approach has been taken forward in the draft submission version of the plan. Additional wording has been added to GWC 1: Employment Growth (b) and (e).</p>
Be Living (Company)	<p>Be Living agrees with the Strategic Objectives for the Great West Corridor and key themes addressed. Increasing housing delivery in line with new London Plan whilst ensuring that the Great West Corridor continues to be an internationally renowned economic hub should remain a priority for LBH. Improvements to open space, connectivity and design/heritage are also important and the five themes should work in parallel with one another to achieve the Objectives for the</p>	<p>Support welcomed.</p>

GWC Spatial Vision and Strategic Objectives		
Respondent	Representation Summary	Council Response
	Great West Corridor.	
LaSalle Investment Management (Company)	<p>LaSalle support overall vision to secure economic growth and address housing requirements through high-density mixed use development on their client’s site (27 Great West Road). However, concern raised as some parts of the GWC Plan are not justified and have the potential to undermine the strategic objective as well as the site’s redevelopment potential. Support for approach to mixed use in the Corridor on the basis that: a) this will provide offices with access to facilities and create an attractive environment, enabling GWC to remain competitive; b) it is undertaken in accordance with emerging New London Plan’s identification of GWC as an opportunity area to accommodate housing and employment growth; and, c) it assists in securing viable development. Concern around focus on growth of the digital, media, broadcasting and professional sectors catering for larger companies, SMEs, microbusinesses and freelance workers rather than industrial and warehousing articulated in employment aspect of Spatial Vision. Suggest reference to ‘employment’ should be replaced with 'economic growth'. Concern around aspiration for new square and a station plaza around Lionel Road station needing to be facilitated through a viable and deliverable development with delivery and funding mechanisms in place. Further clarification on green boulevard with enhanced public realm vision requested. Strong objection to Objective 6 as this is considered to be overly prescriptive, does not represent efficient use of land and is not commercially viable. Claims detailed design measures are adequate to mitigate impacts and request that the reference to “position” is removed. Support for Objective 8 ('strategic and game-changing infrastructure') provided that the GWC maximises the opportunity for development capacity in the area and ensures delivery of the infrastructure itself will not undermine the deliverability and viability of allocated development sites.</p>	<p>Comment noted. Plan preparation has been supported by a detailed masterplanning exercise to provide a comprehensive approach to regeneration in the area, including land use mix, site capacity, co-location of uses, design considerations and environmental and public realm improvements. A key component of this exercise has been improving the quality and provision of services in the area in order to establish a 21st century employment hub and this is articulated in policy. The plan is in accordance with the new London Plan Opportunity Area designation. The plan has also been viability tested for deliverability. The approach to employment articulated in the Vision is informed by our Employment Land Review which identifies these sectors as being particularly important within the GWC area. The focus on employment is consistent with the ambitious Opportunity Area employment targets for the area as set out in the emerging London Plan. The proposal for a new square and station plaza around Lionel Road station has been taken forward through the masterplanning exercise and is factored into the capacity assessment within site allocations. The plan has been tested for viability. The 'green boulevard' has been removed from the Vision for the draft submission version of the plan, however a new emphasis is placed upon delivering public realm improvements in accordance with the Healthy Streets approach as set out in the new London Plan, and this is articulated in policies GWC3 and GWC5. Objection to objective 6 is noted. The approach taken forward is required to enable the level of housing/employment growth whilst addressing persistent air quality and noise issues along the corridor. Support and comment to Objected 8 is note. The</p>

GWC Spatial Vision and Strategic Objectives		
Respondent	Representation Summary	Council Response
		Council's approach is to ensure that infrastructure is delivered alongside the development growth to deliver sustainable development.
Iselworth Society (Community organisation)	Isleworth Society request that recognition be given to the fact that industrial estates, while of great importance to the area, are incompatible with residential development. A policy comment is essential to ensure achievement of objections.	Comment noted. The Plan has been prepared in accordance with the Agent of Change principle as articulated in the new London Plan. The Plan seeks to ensure that developments proposing the co-location of employment and housing will be designed and managed in a manner that safeguards the future operations of existing industrial uses.
Paradigm Land Ltd. (Company)	"Paradigm welcomes the spatial vision to create well-designed mixed-use quarters in the GWC and to transform the area into a series of local places with their own strong characters and identities. Paradigm expresses concerns about how the spatial vision will be delivered. In particular, Paradigm considers that development in the area around Lionel Road in the GWC area should be predominantly residential-led mixed use rather than employment-led. Paradigm do not consider the area to represent a viable modern office location based on market knowledge and Employment land Review not finding area within a "Key Corporate Office Locations" as identified in Figure 4.1. GWC East area is not attractive to modern office locations as a result of car reliance, relatively poor public transport access and its lack of services and amenity for occupiers. Despite major planned upgrades in public transport, it is not an area that should be seeking to provide the same scale of office buildings as currently exist. Paradigm propose revising Figure 4.1 "Overall Spatial Strategy" to show a revised spatial vision with the land to the north of the M4 in the GWC area for residential-led development."	Comment noted. The Council's approach to regeneration in the GWC is to balance the needs of delivering employment and housing, ensuring that there is no net loss of employment floorspace. The comprehensive strategy set out in the Plan includes improving access, provision of services and improved environmental quality along the Corridor to establish a 21st century employment hub. The Parkview site is allocated for mixed-use development comprising intensification of the existing B1 office use with an active commercial frontage, providing a buffer from the A4/M4 for residential uses.
Osterley & Wyke Green Residents' Association (Community organisation)	"Osterley & Wyke Green Residents' Association (OWGRA) repeat point raised by the Brentford Community Council that no development should be given consent unless the appropriate infrastructure improvements are either in place, or have consent and will be in place by the time the development in question is completed. OWGR raise concern relating to "freedoms" obtained for development when an area is designated as an	Comment noted. The plan has been prepared to ensure that infrastructure is delivered alongside development growth in order to deliver sustainable development. The Infrastructure Delivery Plan sets out the infrastructure required to support growth in the borough and Policy GWC7 sets out in greater detail how infrastructure will

<b>GWC Spatial Vision and Strategic Objectives</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	opportunity area. OWGRA recognise this could facilitate rail link proposals, however concern around commercial and housing developments being delivered at unacceptable densities before the new transport links are in place, or that these improvements never materialise. OWGRA recommend a coordinated and systematic approach to infrastructure-development. Further issues raised relating to appropriate densities for living on a human scale and new development undertaken in recognition of surrounding suburban context. Request the Council to influence and moderate the natural desire of developers to exploit to the maximum the opportunities afforded by such an opportunity area."	be delivered in the GWC. Housing and employment delivery has been phased in line with infrastructure delivery. The GWC Plan strategy balances the need for employment and housing growth within the Opportunity Area with the needs of existing residents and sets out how potential impacts will be mitigated against. The masterplanning exercise undertaken in support of the preparation of the Plan ensures that new development responds appropriately to surrounding low density areas, with general heights dropping at the interface with existing residential properties. This approach is taken forward in policy GWC5.
St John's Residents Association (Community organisation)	St John's Residents Association support the statement in para 2.4 recognising that the area is dominated by traffic and that business campuses are inward facing and relate poorly to one another. Concern raised around office campuses such as GSK being isolated and contributing very little to the local economy. Request that development proposals must radically change this.	Support welcomed. The draft submission version of the plan envisions new commercial developments which interact positively to the public realm and which contribute to the permeability of the area. This approach is followed through in policy GWC5 and the place policies P1, P2 and P3.
Friends of the Earth - Hounslow and Brentford (Community organisation)	The Friends of the Earth consider the Plan to be highly aspirational including seeking designation as an Opportunity Area in the London Plan. Friends of the Earth consider local people are unlikely to benefit from opportunities with developers and landowners likely to claim provision of social or affordable housing is not viable. Concern raised around windfall profits for landowners and developers. Request that Council work hard to capture this uplift in value to pay for affordable housing and infrastructure.	Comment noted. The Great West Corridor has been included as an Opportunity Area (OA) in the draft New London Plan as the area has been assessed as having the potential to deliver a substantial amount of new homes and jobs. Opportunity Areas are set by GLA and LB Hounslow must prepare the local plan reviews in accordance with the emerging London Plan. Provision of affordable housing and delivery of infrastructure to support growth are key objectives of the Plan. Policy GWC2 sets a target of 50% or more affordable housing on schemes of 10 or more dwellings, with early and advance stage review mechanisms to maximise the delivery of affordable housing where viability improves.
H. Mortimer (Individual)	Support for retail development in Brentford Town Centre required especially as the Ballymore development planned for the south side of the High Street includes space for this. Retail development on the GWC	Comment noted. Provision of additional retail is provided as part of proposed development within the GWC area in order to service local need and is not

<b>GWC Spatial Vision and Strategic Objectives</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	should not be planned at the expense of the High Street. The GWC should keep its important light industrial estates and these should not be re-developed for housing. Considers the draft plan to be unsatisfactory as it is unrealistic and does not resolve conflicting objectives, relying heavily upon improved transport infrastructure without a firm plan for delivering it.	expected to negatively affect the performance of Brentford Town Centre or impact upon its regeneration. The Plan has been prepared in accordance with the Agent of Change principle as articulated in the new London Plan. The Plan proposes no net loss of employment floorspace on any designated employment sites or any undesignated sites (see policy GWC1). The respondent does not clearly define in what way the plan is unsatisfactory or unrealistic and no added detail on which objectives are conflicting. The plan has been prepared to ensure that infrastructure is delivered alongside development growth in order to deliver sustainable development. The Infrastructure Delivery Plan sets out the infrastructure required to support growth in the borough and Policy GWC7 sets out in greater detail how infrastructure will be delivered in the GWC.
Hounslow Cycling (Charity)	Respondent welcomes including cycling as part of an active public realm.	Support welcomed.
K. Kahler (individual)	The respondent does not agree with the Spatial Vision for the Great West Corridor.	Comment noted.
The Kew Society (Charity)	The respondent agrees with the Spatial Vision for the Great West Corridor.	Support welcomed.
LB Hounslow Public Health (Government)	LB Hounslow Public Health do not agree with the Spatial Vision for the GWC Plan. The Vision should include the words 'health' or healthy living' (eg planning to support health/ healthy lifestyle/ healthy workplace' or similar. This document should mention health within different sections eg. in the 'Optimising Housing Growth' include reference to housing that supports healthy living. A Strategic Objective on 'Health and Wellbeing' should be added.	Comment noted and agreed. Further emphasis has been included on health and wellbeing throughout the draft submission version of the Plan. The spatial vision and strategic objectives have been updated and new policy GWC3 Health and Wellbeing has been added. This approach has also been taken through to the three Place policies: P1, P2 and P3.
D. O'Leary (Individual)	The spatial vision ignores the residential buildings which have been there for 150 years and should be treated with the respect they deserve. Concern over further deterioration of Brentford's heritage and preservation of roads north of the railway. Whilst the respondent	Comment noted. The Plan has been prepared with due regard for context and character to ensure that new development both integrates, respects and enhances the area's natural environment and built heritage. Policy

<b>GWC Spatial Vision and Strategic Objectives</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	appreciates that the area will be developed, they claim that there is plenty of room available to develop without harming the residential areas north of the railway.	GWC5 requires developers to have full regard to the significance of designated and non-designated heritage assets to ensure there are no unacceptable harmful impacts.
London Diocesan Fund (Company)	The respondent agrees with the Spatial Vision for the Great West Corridor	Support welcomed.
A. Allanach (Individual)	The respondent agrees with the Spatial Vision and Strategic Objectives for the Great West Corridor	Support welcomed.
E. Guerst (Individual)	Respondent does not agree with the spatial vision for the following reasons: increased density of commercial activity and residential properties in this area despite current transport links operating at capacity is incompatible with "London becoming a World leader in improving the environment."; concern over worsening levels of air and noise pollution and traffic congestion; and, effect of tall buildings screening noise for some areas, but will acting as soundboard for others and trap air pollution. Some support for strategic objectives but better rail transport links and electric vehicles should be delivered first given health impacts of high levels of air pollution and noise, especially for children. Concern over L B Hounslow building schools on already congested roads and under current (and possibly future) Heathrow flightpaths.	Comment noted. The plan has been prepared to ensure that infrastructure is delivered alongside housing and employment growth in order to deliver sustainable development. This is set out in Infrastructure Delivery Plan. Policy GWC7 sets out in greater detail how infrastructure will be delivered in the GWC, and delivery has been phased accordingly in site allocations. Strategic objectives around sustainable car use and the reduction of air and noise pollution are included and there are taken forward in policies GWC3, GWC5 and GWC6. It is not clear which schools are being referred to here so the Council cannot comment further on this point.

<b>GWC Employment growth</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
E. Guerst (Individual)	Respondent does not agree with the spatial vision for the following reasons: increased density of commercial activity and residential properties in this area despite current transport links operating at capacity is incompatible with "London becoming a World leader in improving the environment."; concern over worsening levels of air and noise pollution and traffic congestion; and, effect of tall buildings screening noise for some areas, but will acting as soundboard for others and trap air pollution. Some support for strategic objectives but better rail transport links and electric vehicles should be delivered first given	"Comment noted. The plan has been prepared to ensure that infrastructure is delivered alongside housing and employment growth in order to deliver sustainable development. This is set out in Infrastructure Delivery Plan. Policy GWC7 sets out in greater detail how infrastructure will be delivered in the GWC, and delivery has been phased accordingly in site allocations. Strategic objectives around sustainable car use and the reduction of air and noise pollution are included and there are

<b>GWC Employment growth</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	health impacts of high levels of air pollution and noise, especially for children. Concern over L B Hounslow building schools on already congested roads and under current (and possibly future) Heathrow flightpaths.	taken forward in policies GWC3, GWC5 and GWC6. It is not clear which schools are being referred to here so the Council cannot comment further on this point. "
Kew Bridge Distribution Centre (Company)	"Kew Bridge Distribution Centre notes that policy GWC2 Part (a) (iii) requires proposals to provide small business units and Part (e) and Part (k) (iii) also require that affordable workspace be provided within development, and considers that it should be recognised that this is not practicable in some locations and does not fit with the strategy for the site. Respondent considers that Part (b) is appropriate as it recognises the contribution employment land can make to mixed-use regeneration, and that Part (c) should be amended so as to accurately reflect an evidence-based approach to employment floorspace requirements. The respondent is of the view that Part (j) of the policy (which requires a net increase in employment floor space within designated sites) directly conflicts with Part (a) (ii) (which requires that employment densities are 'at least' maintained) and Part (k) (ii) (which requires a re-provision of existing employment floorspace as a minimum). Request clarity and claim that this is based on incorrect evidence which could render the requirement undeliverable."	Comment noted. Policy GWC1 has been redrafted to ensure that it is clear and consistent. However, the Council's position remains that there should be no overall reduction in employment floorspace within designated employment areas. This is consistent with the draft new London Plan policies E7 and E1.
Balfour Beatty Investments (Company)	"Balfour Beatty considers that although the Council acknowledges the Power Road LSIS is a mixed employment location characterised by a variety of commercial uses, the proposed policy wording in relation to LSIS Optimising Employment Growth which requires proposals comprising SIL compliant industrial type uses is too inflexible. Recommend that the policy be amended to allow for co-location with residential and other uses in accordance with emerging London Plan Policy E7. Balfour Beatty note the policy requirements for a net increase in employment floorspace on employment sites and consider this policy to be both inconsistent with adopted Local Plan Policy ED2, which seeks to consolidate existing stock and resist loss. Optimising Employment Growth, Our Approach, Paragraph (J) also undermines the Council's	Comment noted. Policy GWC1 has been redrafted to ensure that it is clear and consistent. The Council's position does however remain that there should be no net loss in employment floorspace within designated employment areas. This is consistent with the draft new London Plan policies E7 and E1.

<b>GWC Employment growth</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	ambitions to support small, owner-managed businesses and start-ups focused on the creative industries at the Power Road LSIS."	
Sport England (Government)	"Sport England wish to support further employment growth which follows standards and respects actual PTAL ratings, but consider that there are no proposals to show how these objectives could be met if the "game changing infrastructure" (see para 11 above) is not operational before 2030. Sport England await the Transport Impact Assessment which is not available during this consultation period. "	Comment noted. The draft submission version of the plan has been undertaken in line with the Strategic Transport Study (STS) and proposes sufficient transport interventions to support growth and mitigate transport impacts. This document will be available for review at Regulation 19 consultation.
Royal London Asset Management (Company)	"Royal London Asset Management note criterion (a) of the policy protects Strategic Industrial Locations (SIL) and Locally Significant Industrial Locations (LSIS) and consider the requirements of the policy are not clear and do not provide sufficient flexibility to make the most of existing LSISs where there are opportunities for intensification, co-location and possibly substitution. Respondent suggest Criterion (j) of the policy be re-worded to acknowledge that floorspace does not necessarily constitute employment capacity. Respondent supports the Council's ambition to encourage high quality office floorspace for start-ups and SME's, however express concern that the requirement to deliver this type of accommodation could stymie the prospect of redevelopment of existing sites which may be under-occupied but do not present financially feasible development opportunities. Respondent strongly recommends amending policy wording to state that where employment floorspace for SME's is proposed, the Council will support enabling maximum densities of higher value uses (including residential) if compatible with the areas' employment function."	Comment noted. Policy GWC1 has been redrafted to ensure that it is clear and consistent. The Council's position does however remain that there should be no overall reduction in employment floorspace within designated employment areas. This is consistent with the draft new London Plan policies E7 and E1.
Gillette Corner Holdings Ltd (Company)	Gillette Corner Holdings Ltd consider that part K(ii) contradicts part (i) by requiring that there is a re-provision of existing B Class floorspace, while k(i) gives flexibility on what is delivered to support employment. Gillette Corner Holdings Ltd consider the policy is too restrictive to achieve the objective and that k (ii) should be deleted.	Comment noted. Policy GWC1 has been redrafted to ensure that it is clear and consistent on this point.

<b>GWC Employment growth</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
West Chiswick and Gunnersbury Society (Community organisation)	"West Chiswick and Gunnersbury Society (WCGS) endorse the points concerning economic resilience and the need to provide flexible and affordable work space for SMEs. WCGS suggest that the document should consider the potential impact of Brexit within its Employment Growth policy, including the potential loss of large businesses should the UK leave the EU. WCGS raise concern over policy approach to mix-use employment and residential as the suitability of a site for residential use should be the determining factor in where residential development is sited rather than the need to support employment development. Respondent points to damaging consequences of basing the location and quantity of residential development on perceived need for "enabling" other development as illustrated by the Brentford Stadium scheme. WCGS consider retail provision should be very limited to avoid competing with town centres. WCGS consider it will be necessary to adopt this Alternative Policy Option as it is claimed that delivery the game-changing infrastructure projects will not be possible within the plan period. "	Comments noted. The Council's approach to mixed-use employment and residential development is in line with London Plan policy E7. The Plan has been prepared to support additional capacity for employment floorspace within the GWC area; the effects of Brexit upon development delivery cannot yet be known but are, in any case, beyond the purview of the Local Plan reviews. Provision of additional retail as part of proposed development within the GWC area is included in order to service local needs and is not expected to negatively affect the performance of Brentford Town Centre or impact upon its regeneration. The Council has been working with TfL and infrastructure providers to ensure sufficient transport infrastructure is delivered.
GLA (Government)	" GLA welcome the commitment to no net loss of office floorspace in the Key Existing Office Locations and no net loss in LSIS and SIL and the increase in employment floorspace in regeneration areas. GLA consider that SIL and LSIS employment floorspace must be industrial floorspace (comprising an appropriate mix of B1c light industrial, B2 general industrial and B8 storage and distribution uses). The Mayor is concerned regarding the extent of the mix use development or residential development designated across SIL. Emerging policy E7 does support some co-location of land uses, however Hounslow has not demonstrated how this would work in practice. GLA also note that the mix use designation covers light industrial floorspace and circulation space and ask how residential development would not undermine the overall function of the SIL and LSIS."	Comment noted. The policy has been updated accordingly.
TfL (Government)	" TfL consider conclusions drawn in relation to reduction of employment and residential development capacity should game-changing transport infrastructure not be delivered may be premature, and highlight that it is the purpose of the Strategic Transport Study,	Comment noted. This policy has been updated to reflect the outcome of the Strategic Transport Study.

GWC Employment growth		
Respondent	Representation Summary	Council Response
	jointly let by TfL and LB Hounslow and referenced in the draft plan as currently underway, to identify the appropriate package of transport measures needed to support the growth aspirations set out in the GWC Plan."	
Be Living (Company)	Be Living considers the wording of the draft Policy is too prescriptive, suggesting supporting text (H), (J), (I) predetermines no net loss of office floor space in some locations of the Borough. Be Living considers that where relevant site specific circumstances and viability considerations may also have an influence and these factors should be acknowledged within the wording of the policy.	Comment noted. The Council's position remains that there should be no overall reduction in employment floorspace within designated employment areas. This is consistent with the draft new London Plan policies E7 and E1.
LaSalle Investment Management (Company)	"LaSalle Investment Management welcome and support 27 Great West Road (and the adjoining 1053 Great West Road) being allocated for redevelopment. However, the respondent fundamentally object to 27 Great West Road continuing to be designated as a Locally Significant Industrial Site ('LSIS'). LaSalle Investment Management note Local Plan (2015) Policy SV1 requires the partial review of the Great West Corridor to LSISs designations through Employment Land Review and point to Inspector comments relating to the appropriateness of 27 Great West Corridor for continued LSIS designation. The respondent further claims that the Employment Land Review 2016 (ELR) identifies the site should be safeguarded for "existing use" but does not expressly recommend continued LSIS designation as articulated in emerging London Plan, that the site allocation is inconsistent with the policy position as currently articulated and that the LSIS designation will prevent the site contributing to meeting demand for B1 floorspace. LaSalle Investment Management ask for clarification of designations expressed in Figure 4.2 and question the non-residential frontage designation as being overly prescriptive and inconsistent with the strategic objectives of the plan and would impact development viability. The respondent suggests other detailed design measures to mitigate the noise and air pollution impacts. LaSalle Investment Management claim that the requirement for new development to provide a proportion of small micro and/or affordable workspace, or contribution towards such, should be negotiated taking into account the site's development viability and	"Comment noted. Policy GWC1 in the draft submission version of the plan has been updated to remove LSIS designation and re-designate as a KEOL to reflect the predominant B1 office uses in this area. The non-residential frontage designation has been altered however it remains the Council's position, as part of the Policy GWC3, that non-residential uses should front the A4/M4 Corridor, particularly at ground floor level, in order to safeguard the amenity of future residents. The policy relating to affordable workspace has been amended. All policies within the draft submission version of the local plan have been tested for viability, including the requirement for major development to deliver a quantum of affordable workspace. "

GWC Employment growth		
Respondent	Representation Summary	Council Response
	suggest policy should be amended accordingly"	
Hounslow Green Party (non-profit organisation)	"Hounslow Green Party raise concern as to the lack of reference to reducing carbon emissions from the proposed provision of 246,000 square metres of new office space, or on plans for locally generated electricity, in this policy - in the context of the overall vision that London becomes 'a world leader in improving the environment'. Hounslow Green Party question whether all new buildings in the GWC plan will be expected to be zero carbon-emitting, using 'Passivhaus' or equivalent standards, and whether carbon off-set levies will carry over into this project. "	Comment noted. The Council's policies on carbon emissions are included in the current Local Plan (2015), policies EQ1 and EQ2, and will remain in force throughout the plan period. The Council has recently finalised a Carbon Offset Fund document, which details governance and allocation priorities. The Council promotes zero-carbon developments and its Carbon Offset Fund policy is consistent with the London Plan and the Mayor's Zero Carbon Homes standards.
The Isleworth Society (Community organisation)	"The Isleworth Society raise concerns as to development capacity being dependent on significantly improved access and claim that this should be rail based and not solely achieved through bus service improvements. The Isleworth Society question the conclusion that people wishing to live close to their workplace would desire to live so close to major roads, point to the number of applications for studio/1/2 bedroom flats rather than family accommodation and claim that sites close to the North and South Circular Roads and the A4/M3 corridor are unsuitable for residential development. The Isleworth Society states that there are no proposals to show how employment objectives could be met if the "game changing infrastructure" is not operational before 2030."	Comment noted. The draft submission version of the plan has been undertaken in line with the Strategic Transport Study (STS) and proposes significant improvements in transport infrastructure to support growth in the area, including new and improved rail infrastructure, improvements in bus service provision and active travel (including walking and cycling network) improvements. The Plan includes sufficient transport interventions to support growth and mitigate transport impacts. Development has been carefully phased to align with delivery of transport infrastructure. Regarding residential development co-located with employment, Policy GWC1 requires that development proposals introducing residential development into employment areas would be required to comply with 'Agent of Change' principles to ensure no harm to the continuing integrity of employment operations. The policy states that industrial development would be fronting main road corridors and residential would be located behind, facing away from the main road corridors.
Paradigm Land Ltd (Company)	"Paradigm objects to the requirement articulated in part (h) that development be expected to ensure no net loss of office floor space in Key Existing Office Locations (KEOL) or industrial B Use Class floor space in Locally Significant Industrial Sites (LSISs) and Strategic Industrial	Comment noted. Draft policy GWC1(h) is in line with the draft new London Plan policy E7(e) on release of LSIS and SIL. Park View is allocated for mixed use office B1 residential C3 development. The Council has undertaken

<b>GWC Employment growth</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	Locations (SILs). The respondent is particularly concerned about how this policy will affect re-development of the Parkview site and state that they would only bring forward mixed use development if it includes a reduction in the amount of office space on the site and allows provision of new commercial floorspace designed to meet future demand for accommodation in the GWC area. Paradigm also proposes that part (e) of Policy GWC1 should be amended to avoid a requirement that affordable workspace is provided in all commercial buildings on viability grounds."	an affordable work space market assessment to identify the need for affordable workspace and to explore how more affordable workspace can be delivered, and the draft policy has been updated accordingly.
St John's Residents Association (Community organisation)	St John's Residents Association states that there are no proposals to show how employment objectives could be met if the "game changing infrastructure" is not operational before 2030.	Comment noted. The draft submission version of the plan has been undertaken in line with the Strategic Transport Study (STS) includes sufficient transport interventions to support and mitigate transport impacts. Development has been carefully phased to align with delivery of transport infrastructure.
P. Harding (Individual)	"The respondent notes general concerns about overcrowding and has questions whether the Plan is too ambitious. The respondent further questions whether the Local plan is in conflict in the Employment Land Review (ELR) in terms of office provision in the borough, specifically that the identified requirement for an additional 150,000 square meters of additional office space - plus extra 96,000 sqm additional B1 should Heathrow expansion go ahead - as set out in the ELR does not align with statements regarding existing high levels of office vacancy in the GWC area. Concern is also raised as to the Council having to subsidise affordable workspace at a time when council budgets are stretched and whether proposed office spaces would be occupied. The respondent questions whether retail expansion can be achieved successfully in the GWC in the context of failing high streets, and suggests the Plan should support smaller retail outlets that could provide a helpful service to the local community, if they can prove to be viable in this location."	"Comment noted. The Employment Land Review assessed employment needs over the plan period and takes net loss of floorspace and current vacancy rates into consideration. The Council has undertaken an affordable work space market assessment to identify the need for affordable workspace and explores how more affordable workspace can be delivered. The draft policy has been updated accordingly. The Council's Local Plan (Policy TC3) directs growth of retail uses to the borough's town centres. Provision of additional retail is provided as part of proposed development within the GWC area in order to service local need."
K. Kahler (Individual)	The respondent questions whether growth in employment will generate jobs for local residents and suggests that unless it is stipulated that jobs be taken by those living locally this does not mean anything.	Comment noted. The Plan has been prepared to support additional capacity for employment floorspace within the GWC area. Stipulations as to who employers can hire is not within the purview of Planning.

<b>GWC Employment growth</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
The Kew Society (Charity)	The respondent agrees with the Employment Growth preferred policy option	Support welcomed.
LB Hounslow Public Health (Government)	LB Hounslow Public Health request that reference to health could also be made within the existing objectives, e.g. reference to requiring planning to support healthy workplaces and active travel.	Comment noted. Active travel, including walking and cycling, is supported in the policy GWC5.
D. O'Leary (Individual)	The respondent states that half of the office buildings in the GWC stand empty and questions whether the scale of proposed employment workspace is appropriate if these remain unoccupied. Specific concern raised in relation to impact of unnecessary and redundant offices on existing residents.	Comment noted. Policy GWC1 in the draft submission version has been informed by evidence in the form of the Employment Land Review (ELR) 2016. The policy approach taken involves improving the quality, accessibility and the number of services available to new and existing offices in order to create a modern, attractive business location.
London Diocesan Fund (Company)	The London Diocesan Fund agrees with the Employment Growth preferred policy option and the initial indicative capacity for new jobs.	Support welcomed.
A. Allanach (Individual)	The respondent agrees with the Employment Growth preferred policy option and the initial indicative capacity for new jobs.	Support welcomed.
E. Guerst (Individual)	The respondent states that they agree with the Employment Growth preferred policy option only if transport links are significantly improved and air quality and noise issues are properly addressed. The respondent also states that current proposals are overly ambitious, especially given poor productivity and low economic growth forecasts, and suggests that the Council both employs more people to clean up the rubbish and waste that clutters our streets and town centres and advertise/promote better behaviour more effectively.	Comment noted. The draft submission version of the plan has been undertaken in line with the Strategic Transport Study (STS) proposes sufficient transport interventions to support growth and mitigate transport impacts. Policy GWC1 in the draft submission version has been informed by evidence in the form of the Employment Land Review (ELR) 2016. Street cleaning is not within the purview of strategic planning.

<b>GWC Housing</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
C. Dodds (Individual)	Respondent would like to see improved commitment to social housing as affordable housing as they consider that this is not generally affordable. Raises issue of developers reneging on commitments and reducing the provision of affordable housing based on viability.	Comments noted. The Council's most recent Strategic House Market Assessment Identifies at need for 40% of Housing in the borough to be Affordable over the plan period. The council will seek to ensure new developments coming forward in the Great West Corridor meet these requirements including requiring an

<b>GWC Housing</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
		increased target of 50% affordable housing on industrial land in line in order to maximise the delivery of affordable housing.
Brentford Community Council (community organisation)	Brentford Community Council (BCC) considers that the Council's obligation to provide more housing can be met in different ways and request that the Council demonstrate that suitable housing at reasonable densities can be provided before a target is set. BCC consider that plan does not demonstrate that the GWC has the capacity to house specified population growth at acceptable densities together with required infrastructure, and states that sites close to the north/south Circular Road and the A4/M4 Corridor are unsuitable for residential development even with design mitigation measures proposed. The BCC requests that a specific policy is included in the final plan to ensure that applications do not normally exceed the densities set out in the London Plan appropriate for the site's PTAL at the time an application is made. Concern is raised as to how the Preferred Options plan envisages intensifying industrial estates with co-location of housing as these sites are of great importance to the area and are incompatible with residential development. BCC consider the aim to secure housing in "appropriate locations" cannot be relied upon as government policy allows unsuccessful office schemes to convert to housing as a right, and consider use of the word "optimise" only appropriate if a balanced assessment of each site's development potential in line with Development Plan policies is made. BCC question minimum target of 4,800 new homes and request further explanation for increase in target capacity, proposed heights and densities required to achieve this, and detail on provision of educational, recreational and other needs to support development.	Comments noted. The council commissioned design-led capacity work to identify areas in the Great West Corridor which can support meeting the boroughs identified housing needs. Land of suitable size and position for residential development within the east of the borough is severely constrained, and the Plan Review seeks to find a way to accommodate housing need by securing a plan-led approach which ensure that appropriate physical, transport and social infrastructure investment is made to unlock these sites and maintain good access for existing communities along the GWC. The Draft London Plan encourages the co-location of appropriate industrial uses with housing as a mean to unlocking additional housing sites to meet need. The Plan Review seeks to limit this to sites where it is appropriate. Prior Approval for conversion of office to residential is restricted to properties which were used for a use falling within Class B1(a) (offices) on 29th May 2013 or before this date, so new office development would be excluded from conversion through the prior approval process and require full planning permission. The policy and supporting text have been amended and updated to provide further detail and clarity on issues raised. Please also see new Policy GWC3 Health and Wellbeing and updated GWC7 Delivery and Monitoring for details on infrastructure to support growth.
West Chiswick and Gunnersbury Society (Community organisation)	West Chiswick and Gunnersbury Society (WCGS) agree that office to residential conversions are a serious threat to the commercial activity of the GWC and suggest this point belongs under Economic Growth. WCGS also consider these conversions pose a very serious threat to the	Comments noted. The loss of office accommodation has been identified as a significant threat within the Great West Corridor. The council has issued direction (under Article 4) to restrict the permitted development right to

GWC Housing		
Respondent	Representation Summary	Council Response
	<p>Council's ability to control the quality of accommodation. WCGS consider approach to placing housing behind a protective barrier of commercial buildings might offer a solution on certain sites where site area and configuration permits, however it is maintained that the very high levels of noise and air pollution make much of this area unsuitable for residential development and do not agree that design mitigation measures proposed offer an acceptable solution. WCGS do not support policy GWC2 on principle, and state that the environmental constraints suggest very limited residential development should be contemplated within the GWC. WCGS consider the target of 2300 units in the East section is unrealistic and unacceptable. WCGS consider that it will be necessary to adopt the Alternative Policy Option as it is clear that it will not be possible to deliver the game-changing infrastructure projects within the time frame of the GWC Plan. WCGS believe that the housing targets of the London Plan (2.19) are unrealistic for boroughs where potentially available brown-field sites are located in heavily polluted areas.</p>	<p>allow conversion of Offices to residential. Land of suitable size and position for residential development within the east of the borough is severely constrained. GWC2 seeks to find a way to accommodate the significant housing need in the borough by securing a plan-led approach which ensures that environmental issues are identified and dealt within in the overall approach to applications coming forward on these sites. The plan seeks provision of residential development at the rear of sites, farthest from the Strategic Road network, and with additional buildings in front significantly reduces the ambient noise and air quality issues arising from residential development. The plan also seeks to ensure any new development is in conformity with the existing local plan policies and additional requirements outlined in the review document in new policy GWC3 and amended GWC4. The Plan aims to ensure that the game-changing infrastructure is secured in such a way as to allow for the development of sites identified and thereby ensure sustainable development in the Great West Corridor. London Plan housing targets are based on aiming to meet the significant need for new housing across the City, as identified in the Strategic Housing Market Assessment (2017) constrained by identified capacity in the Strategic Housing Land Availability Assessment (2017). The Draft Plan requires that Local Plans in London seek to meet their 10 year housing targets, and it is a requirement that Borough Local Plans are in general conformity with the plan. The Local Plan Review recognises the challenge of the severely constrained availability of sites in the East of the borough to accommodate much needed housing and employment floorspace. New policy GWC3 seeks to ensure that less</p>

<b>GWC Housing</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
		sensitive non-residential uses are located to provide a buffer between the areas of worst air and noise pollution, while also ensuring all developments minimise exposure to elevated levels of pollution through a number of design-led mitigation measures.
Greater London Authority	GLA state that the draft documents should reflect the Mayor's strategic housing target of 50% affordable housing and include the threshold approach starting at 35% affordable housing, without subsidy. Evidence suggests this will deliver more affordable housing overall. The draft DPDs should note that the emerging London Plan sets a 50% target, without subsidy for public land and industrial sites considered appropriate for release. GLA raise no objection in principle to housing growth but state that this should not be at the expense of employment. Housing to be of a high quality and to protect the amenity of residents.	Comments noted. The draft submission version of the Local Plan review has been updated to reflect the position in the Mayor's Housing SPD, and to ensure it is in general conformity with the changes in the Draft London Plan. The Plan Review Places Policies (P1-P3) are designed to ensure that development coming forward in the area does so in a way which supports effective placemaking, while fulfilling the requirements regarding high quality development and amenity, and provide a structure for the requirements set out in GWC2 - Housing, and the existing Local Plan (2015) to function effectively to deliver housing needed.
Be Living (Company)	Be Living supports the Council's aim to maximise housing provision whilst having regard to environmental, heritage and other constraints. Furthermore, Be Living agrees that the majority of the Borough's new housing should be directed to areas identified in the Places Policies and site allocations, which reflects the status of the area and responds to projected housing need. Be Living is also mindful of the emerging London Plan's new housing targets and the inclusion of the Great West Corridor as a London Plan Opportunity Area. Be Living notes that supporting text (c) refers to a target of 40% as affordable housing and notes that this will need to be amended to reflect the emerging London Plan and viability and site specific constraints. Be Living considers that the policy should be amended to outline a preference for mixed use development, but allow the flexibility that where this is not appropriate, due to viability or other material considerations, each proposal will be considered on its merits. Be living consider this approach would also provide LBH with flexibility in the future should housing need increase and the need for employment/retail floorspace to decrease or vice	"Comments noted. The Local Plan review has been updated to reflect the position in the Mayor's Housing SPD, and to ensure it is in general conformity with the changes in the Draft London Plan. Comments noted on point (f) of policy GWC2. The policy already expects developments to be of a mixed use format, and is supported by the GWC Capacity Study which provides guidance on how this can be achieved. The plan should be read as a whole, and when taking into account the requirements set out in GWC1 is considered to provide a high level of flexibility while recognising the key aim of employment and housing growth. The Plan has been amended to ensure it is in general conformity with the Draft London Plan including finding ways that the Great West Corridor can support meeting the potentially higher target for the borough and examine ways to meet the increased Opportunity Area target as the OA is

<b>GWC Housing</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>versa. Be Living considers that the initial proposed capacity for new homes in the area should reflect the draft London Plan which allocates 7,500 units to the Great West Corridor Opportunity Area, far in excess of the 5,200 units quotes in Policy GWC2, to determine the approach to development and density throughout the document. ""Be Living promotes a new Private Rented Sector / Build to Rent policy within the Local Plan Alterations document and welcome further discussion with the Council on this point. Be Living consider that flexibility should be provided to developers to deliver innovative housing types such as flexible, 1-person units especially where there is a significant provision of communal facilities and innovations such as this should be encouraged in planning policies to meet and exceed housing delivery targets, in accordance with the "alternative pathway" identified within Section Four of the 'Mayor's Homes for Londoners SPG'.</p>	<p>developed. The Plan approach is in line with the Mayor's Homes for Londoners SPG. "</p>
Legal and General (Company)	<p>Legal and general state that policy should Include bespoke Build to Rent and affordable housing policies for the area given the significant impact that local infrastructure requirements will have on development economics.</p>	<p>Comments noted. The Plan has been amended to include specific affordable housing requirements and the council's policy on Build to Rent in order to ensure it is in general conformity with the Draft London Plan.</p>
LaSalle Investment Management	<p>LaSalle Investment Management request that GWC policy is reviewed to take account of the increased overall borough housing target and GWC OA housing target set out in the emerging New London Plan, particularly in the context of the Council's approach to tall buildings. LaSalle Investment Management note that Figure 4.3 identifies a narrow linear strip of land along the southern boundary of 27 and 1053 Great West Road (Site 5) as residential use and raise concern as to the adjoining railway and proposed station and Brentford Community Stadium, the potential to create single aspect flats and the inability to maximise site potential and make the best and most efficient use of land as required by national policy and the emerging London Plan's objective. LaSalle Investment Management strongly object to the prescriptive approach to identifying the location of residential buildings within a site specific allocation.</p>	<p>Comments noted. The Plan has been amended to ensure it is in general conformity with the Draft London Plan. Figure 4.2 sets out indicative massing for buildings as part of site allocations. Detailed design will be considered at application stage and development proposals will have to be in accordance with policies set out in the Local Plan reviews and adopted Local Plan (2015).</p>
Hounslow Green Party	<p>Hounslow Green Party consider that there is a danger that the 'area of opportunity' will not deliver equal opportunities, because it will not</p>	<p>Comments noted. The Council recognises that there are significant affordability issues in both the borough and</p>

<b>GWC Housing</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>provide any housing at a cost that is genuinely affordable to local people on average and below average incomes. The target of 40% 'affordable' housing would be a good aspiration, except that 'affordable' is currently defined as a 20% discount on market prices, out of reach for many. Concern also raised in relation to Point 4.10 (p.49) which appears to be an unacceptable loophole around scheme viability.</p>	<p>the wider London Market. The draft submission version of the Plan has been updated to reflect the affordable housing position in the Mayor's Housing SPD, and is in general conformity with the changes in the Draft London Plan to affordable housing. It requires that where affordable housing is delivered on Schemes, this is split between 30% Intermediate Tenures (including the referred to Affordable Rent) and 70% Social Rented units for those not able to afford the discounted rates. Point 4.10 aims to ensure that, in cases where initial viability assessments at application stage demonstrate the site is unable to provide the maximum reasonable amount of Affordable Housing, where viability of these developments improves over the course of its implementation and completion this is reflected in contributions made to affordable housing at the completion of the project. It does not provide for developers to mitigate overall affordable housing delivery, and in most cases will result in additional affordable housing units and/or contributions for affordable housing.</p>
<p>The Isleworth Society (Community organisation)</p>	<p>The Isleworth Society considers that the Local Plan should include a statement that applications for sites with low PTAL ratings at the time of submission should be refused as consent for further office buildings prior to substantial improvements in public transport will lead subsequently to conversion of commercial sites to residential. The Isleworth Society raise concern around references to the GWC as an Opportunity Area (OA) or an Intensification Area as they state that neither designations are formally adopted. The Isleworth Society consider that the GWC does not have the capacity required if heritage assets are to be respected, homes provided that do not depend on artificial ventilation or that accord with densities that pay attention to PTAL. The Isleworth Society raises the need for affordable housing as it is considered that too many past permissions been permitted omitting</p>	<p>Comments noted. The Plan seeks to ensure that development in the Great West Corridor comes forward in a planned manner with the prerequisite improvement to transport infrastructure which will enable higher PTALs and better accessibility. The ability to convert commercial sites to residential would require additional full planning permission as the Prior Approval route for conversion of office to residential is restricted to properties which were used for a use falling within Class B1(a) (offices) on 29th May 2013 or before this date, so new office development would be excluded from conversion through the prior approval process. The Draft London Plan at policy SD1 includes the Great West</p>

<b>GWC Housing</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>affordable housing citing exceptional circumstances. The Iselworth Society notes Hounslow's target is in the region of 10,500 new homes but it has not been demonstrated that the Great West Corridor has the capacity to provide 45% of this housing over the plan period. The Society state that no estimate has been given of additional school population or how this will be met, and request that requirements for schools need to be realistically demonstrated, and show facilities will be provided in a way that supports residents close to their homes.</p>	<p>Corridor Opportunity Area as part of the Elizabeth Line West Area. The Plan recognises and seeks to meet the challenge of the severely constrained availability of sites in the East of the borough to accommodate much needed housing and employment floorspace. Therefore, it seeks to enable new homes to be provided and jobs growth accommodated in a planned approach which ensures infrastructure provision is met (as per policy GWC5), that developments respond sensitively to neighbouring heritage assets, and seek to make use of these buildings as a key part of place making. New policy GWC3 seeks to ensure that less sensitive non-residential uses are located to provide a buffer between the areas of worst air and noise pollution, while also ensuring all developments minimise exposure to elevated levels of pollution. The draft submission version of the Plan requires that developments provide the maximum reasonable amount of affordable housing with reference to a 50% strategic target. This policy is in line with both the approach taken by the London Plan and National Planning Policy Framework, and in some cases viability assessment has indicated that ability to provide affordable housing is not viable at time of permission. However, if viability improves during the implementation and completion of the development, policy GWC2 includes a requirement for provision for a re-appraisal of viability when the scheme has been completed and largely occupied. Where viability has improved, the applicant will be expected to make further affordable housing provision to the appropriate threshold. Sites have been assessed as part of the Local Plan reviews for schools and have been allocated where they fit with aims of the plan.</p>
Paradigm Land Ltd (Company)	Paradigm supports the approach of draft Policy GWC2 to optimise the	Comments Noted. The draft submission version of the

<b>GWC Housing</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>supply of housing in appropriate locations in the GWC. It supports the statement in part (e) of the policy to: “Make effective and efficient use of land by promoting higher density development in highly accessible locations particularly around transport nodes and in accordance with the Places Policies.” However, Paradigm considers that part (e) should reflect the approach of the DNLP that the density of residential development should be optimised around areas with good existing or planned public transport. Paradigm notes that Policy GWC2 refers to new site allocations setting out the Council’s plans for determining the location and sustainable quantum of additional employment and residential development. While the Parkview site sits within Site Allocation 16 in Figure 4.3, this area is not included the site allocations that are set out in Appendix 1 of the LPR. Paradigm requests that the LPR includes a site allocation for Site 16, which should reflect the approved PDR scheme for the site, and should propose residential-led mixed use development.</p>	<p>Plan has been amended to ensure it is in general conformity with the Draft London Plan including finding ways that the Great West Corridor can support meeting the higher target for the borough and examine ways to meet the increased Opportunity Area target. The council has reviewed the site allocations and has made appropriate changes to the size and type of these allocations to meet plan objectives, including the mix of uses on these sites.</p>
St John's Residents Association	<p>St John's Residents Association raise concerns around the proposed targets set in the London Plan for 14,000 homes should the area be designated as an Opportunity Area and state that this should not be at the expense of employment, nor compromise an urban design vision for the Golden Mile. St John's Residents Association note that the area is not currently included as an Opportunity Area in London, nor an Intensification Area and state that the area currently does not have the capacity required for this if heritage assets are to be respected, homes provided that do not depend on artificial ventilation or accord with densities that pay attention to PTAL. St John's Residents Association note the need for affordable housing but state that too many past permissions been permitted omitting affordable housing citing exceptional circumstances. St John's Residents Association note that Hounslow's target is in the region of 10,500 new homes and suggest that it has not been demonstrated that the Great West Corridor has the capacity to provide 45% of this housing over the plan period. St John's Residents Association state that no estimate has been given of additional school population or how this will be met.</p>	<p>Comments Noted. The draft London Plan sets a strategic target of 7,500 homes for the Great West Corridor OA. The Plan Review aims to ensure that development comes forward in area in a planned way which ensures job and housing growth is accommodated at the point where key infrastructure to support this growth is provided, and this development meets to requirements of the policies set out in the plan and Local Plan (2015). The Draft London Plan at policy SD1 includes the Great West Corridor Opportunity Area as part of the Elizabeth Line West Area. The draft submission version of the Plan requires that developments provide affordable homes with reference to a 50% Strategic Target, and comply with the requirements of the Draft London Plan. The policy approach is in line with both the approach taken by the emerging London Plan and National Planning Policy Framework, and in some cases viability assessment has indicated that ability to provide</p>

GWC Housing		
Respondent	Representation Summary	Council Response
		affordable housing is not viable at time of permission. However, if viability improves during the implementation and completion of the development, policy GWC2 includes a requirement for provision for a re-appraisal of viability when the scheme has been completed and largely occupied. Where viability has improved, the applicant will be expected to provide further affordable housing to the appropriate threshold. Sites have been assessed as part of the Local Plan reviews for schools and have been allocated where they fit with aims of the plan
H. Mortimer	The respondent states that Hounslow Council should make clear what its targets for additional residential housing are as this is not clear in the POC. The respondent considers that the area close to the north and south Circular roads and the A4/M4 are not suitable for housing as there are excessive pollution levels, poor public transport and traffic congestion in this area.	Comments Noted. The Council has reviewed the capacity numbers for the three places policies and the Plan Review Area in light of the proposals in the Draft London Plan for the Great West Corridor Opportunity Area and has made appropriate changes to the size and type of these allocations to meet plan objectives. The Plan recognises and seeks to meet the challenge of the severely constrained availability of sites in the East of the borough to accommodate much needed housing and employment floorspace. Therefore, it seeks to enable new homes to be provided and jobs growth accommodated in a planned approach which ensures infrastructure provision is met (as per policy GWC6), that developments respond sensitively to neighbouring heritage assets, and seek to make use of these buildings as a key part of place making (GWC5). New policy GWC3 seeks to ensure that less sensitive non-residential uses are located to provide a buffer between the areas of worst air and noise pollution, while also ensuring all developments minimise exposure to elevated levels of pollution.
P. Harding (Individual)	The respondents states that the only real affordable housing in London is council rented properties and that the plan should insist that most	Comments noted. The draft submission version of the Plan has been amended to ensure conformity with the

<b>GWC Housing</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>new homes should be of this type and, if necessary, the Council should build their own houses in order to avoid the apparently common practice whereby developers avoid their original "affordable" commitment citing commercial viability. The respondent states that the scale of housing growth would be a travesty if local residents could not afford to live in the area.</p>	<p>Draft London Plan and Mayor's Affordable Housing SPD. The Council recognises that there are significant affordability issues in both the borough and the wider London Market. The draft submission version of the Plan has been updated to reflect the affordable housing position in the Mayor's Housing SPD, and is in general conformity with the changes in the Draft London Plan to affordable housing. It requires that where affordable housing is delivered on Schemes, this is split between 30% Intermediate Tenures (including the referred to Affordable Rent) and 70% Social Rented units for those not able to afford the discounted rates. This policy is in line with both the approach taken by the emerging London Plan and National Planning Policy Framework, and in some cases viability assessment has indicated that ability to provide affordable housing is not viable at time of permission. However, if viability improves during the implementation and completion of the development, policy GWC2 includes a requirement for provision for a re-appraisal of viability when the scheme has been completed and largely occupied. Where viability has improved, the applicant will be expected to provide further affordable housing to the appropriate threshold.</p>
K. Kahler (Individual)	<p>The respondent does not agree with the Housing Growth preferred policy option and states that they would change most of it. The respondent does not agree with the initial proposed capacity for new homes and states that this is too high. The respondent states that solution would be to move the main airport off the coast of Wales and convert LHR to housing. The respondent considers that there are no further sites that could be brought forward to deliver housing in the plan period as there are no services and states that an alternative policy option should require no new housing being proposed.</p>	<p>Comments Noted. The Local Plan Review aims to respond to the significant need for new housing across the borough and wider city, as identified in the Strategic Housing Market Assessment (2018), and to do this with a planned approach which ensures the necessary physical and social infrastructure are provided to support development.</p>
The Kew Society (Charity)	<p>The Kew Society agree with the Housing Growth preferred policy option</p>	<p>Comment Noted. The draft submission version of the</p>

<b>GWC Housing</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>however concern is raised as to sites being brought forward prematurely in terms of pollution levels (in line with adopted Local Plan policies). The Kew Society also request a policy requiring the design and massing of new housing to blend carefully with adjacent areas of low rise housing, town centre developments and open space, with a particular focus on the quantity of high-rise residential developments planned for the eastern end of the GWC.</p>	<p>plan contains Policy GWC3 which seeks to ensure that less sensitive non-residential uses are located to provide a buffer between the areas of worst air and noise pollution, while also ensuring all developments minimise exposure to elevated levels of pollution through a range of mitigation measures. Policy GWC5 seeks to ensure that proposals for development in the corridor meet strict design and massing standards, protect and where possible enhance strategic and local views, and demonstrate that a robust design review process is undertaken that shows how the building impacts designated and undesignated heritage assets and that views have been tested, considered and any impacts appropriately mitigated, through the use of verified view impact studies.</p>
<p>LB Hounslow Public Health (Government)</p>	<p>LB Hounslow Public Health request reference is made to the need for housing to support the health of people of all ages, including requirements for: adequate play space, active travel networks and infrastructure, adequate private amenity space provision, minimal car parking provision, housing schemes and recreational spaces designed to increase passive surveillance, sport and leisure facilities, access to well signposted and multi-functional green and blue spaces and adequate social infrastructure provision and co-location of services where appropriate. LB Hounslow Public Health also advise that new housing development and neighbourhoods are future-proofed to be 'dementia friendly'.</p>	<p>Comment noted. Comment noted and agreed. Further emphasis has been included on health and wellbeing throughout the draft submission version of the Plan. The spatial vision and strategic objectives have been updated and new policy GWC3 Health and Wellbeing has been added. This approach has also been taken through to the three Place policies: P1, P2 and P3.</p>
<p>D. O'Leary (Individual)</p>	<p>The respondent disagrees with the preferred policy option and states that there are no facilities in Brentford to cater for more residents in terms of doctors, dentists, schools, retail (following closure of Morrisons) and transport - including existing bus services. The respondent states that Brentford is not providing affordable homes as half of the development at Kew Bridge stands empty because they are either too expensive or have been bought as an investment rather than as a home. The respondent considers that there are already too many</p>	<p>Comment noted. Policy GWC7 of the Local Plan Review sets out how the Council will ensure the necessary supporting physical and social infrastructure will be provided as set out in the Infrastructure Delivery Plan (2019). The overall approach taken in the Places policies set out in more detail how development will be delivered to coincide with the delivery of supporting infrastructure. The Council's most recent Strategic</p>

<b>GWC Housing</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	sites coming forward for new residential development and requests that the Council stop ruining Brentford and allowing property developers to make massive amounts of money at residents' expense. Specific mention is made to the site south of the high street which has stood empty for years	House Market Assessment Identifies a need for significant growth in affordable housing delivery in the borough, and the council will seek to ensure new developments coming forward in the Great West Corridor meet the requirements of the strategic target of 50% affordable housing provision in order to meet objectively assessed needs. The draft submission version of the Plan has been amended to ensure conformity with the Draft London Plan and Mayor's Affordable Housing SPD. The Council approved redevelopment of the site to the south of the High Street in 2015 (Ref: 00607/BA/P2).
London Diocesan Fund (Company)	The London Diocesan Fund agree with the Housing Growth preferred policy option however it is acknowledged that there is a gap between the need for housing and the supply of deliverable land which is set to increase following the release of the draft London Plan's Review 2017 housing targets increasing Hounslow's housing target to 21,820 over a 10 year period (2,182 dpa). The London Diocesan Fund suggest that if Hounslow are to achieve the required uplift in housing (165%) then sites such as Rectory Meadow (which is available within the 20 year timeframe, exceeds 0.2 ha and is capable of delivering 5 or more dwellings) will need to be identified and included in the Council's site allocations.	Comment noted. The council has considered the Draft London Plan target and amended capacities where it considers sites in the Great West Corridor can support this. Rectory Meadow does not fall within the Great West Corridor Plan Review Area.
A. Allanach (Individual)	The respondent does not consider that there are any additional or alternative policies that the Council should consider in relation to Housing Growth and does not propose any further sites that could be brought forward to deliver housing in the plan period. The respondent agrees with the Housing Growth preferred policy option and with the initial proposed capacity for new homes.	Support welcomed.
E. Guerst (Individual)	The respondent does not agree with the Housing Growth preferred policy option and proposes that the Council delay erecting homes in the GWC area until the environment (in particular air quality and noise levels) has been significantly improved. The respondent considers that double/triple glazing or mechanical air filtration are not	Comments noted. The Local Plan Review recognises the challenge of the severely constrained availability of sites in the East of the borough to accommodate much needed housing and employment floorspace. Therefore, it seeks to enable new homes to be provided and jobs growth

<b>GWC Housing</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>appropriate measures given the need to combine these with air conditioning in Summer which increases energy consumption. The respondent considers that initial proposed capacity is too high in terms of density, but acknowledges there needs to be a bigger proportion of social housing. Suggests that there will be a reduction in demand for housing/school places following Brexit. The respondent does not consider that there are any further sites that could be brought forward to deliver housing in the plan period or that there are any additional or alternative policies that the Council should consider in relation to Housing Growth</p>	<p>accommodated in a planned approach which ensures infrastructure provision is met (as per policy GWC7) , that developments respond sensitively to neighbouring heritage assets, and seek to make use of these buildings as a key part of place making (GWC5). Policy GWC3 seeks to ensure that less sensitive non-residential uses are located to provide a buffer between the areas of worst air and noise pollution, while also ensuring all developments minimise exposure to elevated levels of pollution. The Council's most recent Strategic House Market Assessment Identifies a need for significant growth in affordable housing delivery in the borough, and the council will seek to ensure new developments coming forward in the Great West Corridor meet the requirements of a strategic target of 50% affordable housing provision in order to meet objectively assessed needs. The draft submission version of the Plan has been amended to ensure conformity with the Draft London Plan and Mayor's Affordable Housing SPD.</p>

<b>GWC Design and Heritage</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
Orchard Road Residents Group	<p>Orchard Road Residents Group raise queries as to how some of the proposed development sites would conform to the Hounslow Local Plan's Policy CC1 Context and Character criteria, which purport to 'recognise the context and varied character of the borough's places, and seek to ensure that all new development conserves and takes opportunities to enhance their special qualities and heritage'.</p>	<p>Comments noted. Policy GWC3 (Design and Heritage) sets out detailed design and height parameters and consideration of the existing character for sites in the Great West Corridor, and have been devised taking into account heritage assets and local character in this area.</p>
G. Christian (Individual)	<p>The respondent queries how some of the proposed development sites conform to the Hounslow Local Plan's Policy CC1 Context and Character criteria, which purport to 'recognise the context and varied character of the borough's places, and seek to ensure that all new development conserves and takes opportunities to enhance their special qualities and</p>	<p>Comments noted. Policy GWC3 (Design and Heritage) sets out detailed design and height parameters and consideration of the existing character for sites in the Great West Corridor, and have been devised taking into account heritage assets and local character in this area.</p>

<b>GWC Design and Heritage</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	heritage’.	
Port of London Authority (Government)	The Port of London Authority (PLA) support reference to the River Thames as part of this policy, and request that they are consulted on any development proposals which may have an impact on the setting of the River Thames Corridor.	Support welcomed.
CBRE Global Investors (Company)	CBRE Global Investors welcome that the GWC Plan establishes strategic and local important views from heritage assets and that the site adjacent to the proposed Lionel Road Station is appropriate for a landmark building. CBRE support the delivery of corridor landmark buildings, to provide distinctiveness to the A4/M4 corridor when viewed from street level as well as dynamic views from along the route and maintain that the location adjacent to the proposed Lionel Road Station is appropriate for such a focal building, in line with both the proposed and emerging London Plan’s requirement to siting high density development close to transport hubs, and considering that further taller buildings could be accommodated within this area without a detrimental impact on the setting of heritage assets, as demonstrated within the supporting Views Appraisal document. CBRE consider that the supporting evidence for the GWC Plan does not demonstrate that there has been any site-specific assessment that justifies proposed heights. CBRE note that their site falls close to the designated heritage assets of Gunnersbury Park Register Park and Gardens and Conservation Area, and the Royal Botanic Gardens Kew World Heritage Site. CBRE maintain that their own supporting Views Appraisal document have tested the relevant strategic and local important views that either cross or fall close to the site, and claim that the emerging proposal can be accommodated without having a significant impact on important views given, and that their scheme is not visible within the majority of the important views due to the intervening built form and vegetation.	Comment Noted. The draft submission version of the plan has been updated and Design and Heritage Policy GWC3 now refers to 'focal buildings', which form the centre of clusters of taller buildings. The location and heights of tall buildings have been identified through careful consideration and analysis of the impact of taller developments on adjacent heritage assets. The Council also strives to establish, through the Local Plan Review, a clear and legible cityscape for the area which is, in part, the result of testing of heights and locations for this building type. Furthermore, intervening vegetation and other buildings cannot be relied upon as screening and this is the reason why the Council has opted for a coordinated framework based approach to the location and heights of tall buildings in the area.
Historic England	Historic England (HE) particularly welcome that the plan: recognises the benefits that a clear strategic plan can bring in avoiding harmful cumulative effects to the experience of the place and the surrounding sensitive heritage assets; provides for the corridor to be addressed as an entity, and is based on masterplanning principles across the GWC	Support welcomed. Further work has been undertaken on views which has informed the Great West Corridor Masterplan heights framework. Design and Heritage Policy CWC5 has been updated accordingly. LB Hounslow has engaged with HE throughout the

<b>GWC Design and Heritage</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>plan area; and is based on analysis of views in the GWC Masterplan and this has informed the location of individual taller buildings. HE state that work should continue to clarify specific impacts in respect of landmark buildings and, in some cases, reductions in proposed heights should be made to identify general heights which, in most areas, will assist with a more contextual relationship with the surrounding townscape, and improve the sense of place within the corridor. HE would be grateful for further discussion to understand the extent of the views analysis work in relation to the most sensitive sites.</p>	<p>preparation of both the GWC Masterplan and the draft submission version of the Plan, and welcomes the opportunity for further discussion.</p>
<p>Facilitas Technical Engineering Services Ltd (Company)</p>	<p>Facilitas Technical Engineering Services Ltd strongly disagree with the approach to building heights and are very concerned that the draft policy has the effect of unduly constraining and prescribing the form of development in the Brentford East area.</p>	<p>Comments noted. The policy is considered to be a reasonable and justified response to the evidence base and the scale of development which has been coming forward. The draft submission version of the Plan seeks to provide a comprehensive and masterplan-led approach to managing development in the GWC rather than a scattered, ad hoc approach. Providing a band of acceptable heights is compliant with the Draft New London Plan and allows new development to appropriately address setting and context.</p>
<p>Brentford Community Council (Community organisation)</p>	<p>Brentford Community Council (BCC) state that specific policies to protect the scale and character of the residential streets north and south of the Corridor should be written into the Local Plan Review. The BCC consider GSK to be a good example of development to emulate and recommend lower density development should be promoted in order to achieve this. The BCC state that they would object to any policies which promote tall buildings which could harm views out of and toward listed buildings (e.g. the Gillette Building) or Conservation Areas, and consider this should be protected by specific policies. The BCC state that a number of new buildings have been built along the A4/M4 corridor which each seek to grab the attention of passing motorists and note the excessive level of advertising built to be visible from the M4 viaduct. The BCC recommend adopting a coherent design code for new buildings in order to respect heritage and to establish an agreed design discipline. The BCC object to the concept of a Gateway Feature being an objective</p>	<p>Comments noted. It is considered that both existing policies (in the adopted Local Plan) and the new policies promoted in the GWC Local Plan Review provide appropriate protection for the residential streets referred to. Policy GWC5 seeks to provide a co-ordinated approach to tall building development, as opposed to an unmanaged and ad hoc approach, as the best way to accommodate new development in this area whilst striving to protect adjacent heritage assets. The heights framework is based on detailed testing of heights and locations as detailed in the Great West Corridor masterplan and appendices. Policies also identify advertising proliferation as an issue and aim to limit the spread and ensure new signage is appropriately designed and incorporated into the built fabric.</p>

GWC Design and Heritage		
Respondent	Representation Summary	Council Response
	in the plan. The BCC request that the Plan should include a specific policy to ensure that any development which crosses the existing skyline seen from Kew Gardens should normally be refused and do not accept either the “scattered” approach or the “co-ordinated” approach to tall buildings in these circumstances. The BCC request that the Council to adopt a more rigorous policy to control advertisements than that proposed.	
Royal London Asset Management (Company)	"Royal London Asset Management strongly support the Phoenix Trade Park site’s allocation for a focal point and focal building to respond to the taller buildings on the southern side of the A4/M4 roadway. "	Support Noted.
West Chiswick and Gunnersbury Society (Community organisation)	"The West Chiswick and Gunnersbury Society (WCGS) strongly endorse the need for promotion of high quality urban design and conserving heritage. The WCGS state that policy should emphasise that the prestigious and attractive pre-war buildings achieve their “landmark” status not by their height but by means of their restrained elegance and their nuanced designs, and request that new buildings on neighbouring sites pay full respect and be subservient to these classic buildings. The WCGS state that whilst consideration of the impact of development on important site lines and vistas from major historic open spaces is essential, consideration of impacts should not be confined to these. WCGS state that due consideration should be given to the dynamic nature of how people experience their surroundings and views assessed with respect to a particular site-line or vista provide snap-shots from a specific point despite the impacts of tall buildings being felt over a wide area. The WCGS recommend specific mention should be made to developers being expected to engage positively with the purpose and core principles of chapter 6 of the Local Plan, including policies CC1, CC4 and supporting text. The WCGS agree with key issue 2 and recommend adding detail on how the topography of the area affects the impact of tall buildings. The WCGS support the overall policy approach and recommend a number of additions and amendments to design and heritage policy around clarification of the sense of arrival given Hounslow's outer London location, additions to policy relating to advertising signage not being permitted on residential or other	"Comment re focal status noted. The plan identifies sites with potential to act as focal points and policy wording has been updated to reflect the definition of focal buildings which, whilst not necessarily taller, should stand out among other developments and enhance legibility through their distinctive form and architecture. Policies in the Plan require developments to respect adjacent heritage assets and are intended to be applied together with Policy CC4 of the existing adopted Local Plan. The consideration of proposed heights has been designed to account for dynamic views. Comment noted re. Topography of the Great West Corridor and this is considered to already be implied in the current wording of Key Issue 2. Comment noted re. proposed "Our Approach" amendments however it is considered that the purpose and principles of a policy are best addressed at Development Management stage and therefore the Council feels that there is no need to include an additional comment to this effect. Comment noted re. Hounslow being an Outer London borough, however the borough's eastern extent borders on the city's middle/inner ring and it is the intention that this 'gateway' site therefore serves the function of demarcating arrival into central London. Comment

GWC Design and Heritage		
Respondent	Representation Summary	Council Response
	<p>buildings where this would have a negative impact on residential amenity and recommend provision of an Advertising SPD. The WCGS consider the Alternative Policy Option of a “scattered approach” would be totally unacceptable as so much damage has already been done or is “consented” by using the scattered approach to tall buildings that a “tipping point” has been reached. WCGS set out the need for a strong commitment to valuing and protecting the surrounding heritage assets and the character of the surrounding area. WCGS recommend that additional tall buildings should be discouraged from much of the GWC and, with the exception of the Eastern Gateway focal and the two Corridor focals, excluded entirely from the area covered by the Brentford East SPD. WCGS note that residential development on certain sites could be adequately shielded from air and noise pollution impacts through a protective barrier of commercial buildings, however it is considered that the very high levels of noise and air pollution make much of this area unsuitable for residential development. WCGS do not agree that design “mitigation” such as sealed windows, mechanical ventilation, winter gardens and locating residential uses above a certain height offers an acceptable solution.</p>	<p>noted and agreed re. GWC3(l) as exceptional height cannot be achieved. Wording has been amended to clarify this point. Comments noted re. advertising on residential buildings. Wording has been amended accordingly to better protect amenity and occupants and neighbours living conditions. Comment noted re advertising SPD and this will be considered. In terms of tall buildings, the evidence base has been prepared in a robust manner, testing different height scenarios and capacity for growth. The policy approach chosen stems from this work and is based on situations that been demonstrate the least to no impact on important heritage assets. It is considered that the masterplan-led approach will best protect heritage and support development. The Local Plan Review recognises the challenge of the severely constrained availability of sites in the East of the borough to accommodate much needed housing and employment floorspace. New policy GWC3 provides further detail on how sensitive non-residential uses will be used to provide a buffer between the areas of worst air and noise pollution and more sensitive residential uses. as well as a range of other design measures to minimise pollution impacts through the provision of noise and vibration insulation, winter gardens and balconies and the use of greenery to act as a buffer. It is worth noting the applications will need to consider health and wellbeing during the design stages and use Best Available Techniques (BATs) to mitigate and minimise any adverse effects on health and quality of life (e.g. noise, air or light pollution, etc.). Proposals for major development schemes should also be supported by Noise Assessment, Air Quality Assessment (AQA) and Health Impact Assessment (HIA)."</p>
Greater London Authority	The GLA consider that building heights should not be unduly restrictive,	Comment noted. This is not considered to be an

<b>GWC Design and Heritage</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
(Government)	except where this is to protect heritage assets.	acceptable design rationale as height may also affect neighbours' living conditions and lead to densities and levels of intensity of development that may be inappropriate.
TfL (Government)	TfL recognises the severance caused by transport infrastructure such as the A4 or railways and will work with LB Hounslow to explore options for how local connectivity, in particular for pedestrians and cyclists, can be improved in the area. TfL welcome the approach to public realm and recommend that reference to the Healthy Streets approach and the Healthy Streets checklist should be included.	Support noted. Draft submission policies have been updated to reflect the Mayor's Healthy Streets approach.
Be Living (Company)	Be Living supports the general aims and principles of the Design & Heritage draft policy but considers that the policy is too prescriptive and greater flexibility is required to the approach to tall and landmark buildings. Be Living note the uncertainty regarding housing delivery targets and the on-going housing shortage, and consider that the approach to determining the suitability of tall buildings should be on a site by site basis supported by a thorough assessment of heritage assets and key and strategic local views in line with the alternative policy approach.	Comment noted. The policy has been determined on a site by site basis and within a design framework which recognises some sites may be better suited for taller buildings. The policy is considered to be a reasonable and justified response to the evidence base and to the scale of development which has been coming forward, and seeks to provide a comprehensive and co-ordinated masterplan-led response to managing development rather a 'scattered approach'. Providing a band of acceptable heights is compliant with the draft New London Plan and allows new development to appropriately address setting and context. The Council's background work to the Local Plan for the GWC (Great West Corridor Masterplan) explore options for assessing proposals for tall buildings. The selected option aims to strengthen the area and its character through the creation of a comprehensive and coordinated cityscape and skyline of tall buildings in identified locations with tested and identified heights. The polices are based on meeting current and forecast housing need, but this does not preclude applicants making exceptional cases, which they will be expected to justify in all respects and to allow the Council to consider all material considerations as it would in assessing any application

<b>GWC Design and Heritage</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
LaSalle Investment Management (Company)	LaSalle Investment Management note that Policy GWC3 supports the delivery of landmark buildings, including within the 27 Great West Road allocation as identified in Figure 4.4. LaSalle Investment Management requests that the Council note that their client supports the principle of the proposed Lionel Road Station being proposed adjacent to their site, however this support is subject to the GWC Plan and the site specific allocation ensuring the viability and deliverability of the redevelopment of their client's site. LaSalle Investment Management question the articulation of policy GWC3 (I) the design and height of each focal site will need to be of exceptional quality "exceptional quality" and state that such a test is ambiguous and not in accordance with national policy or the London Plan, therefore request a definition be provided for further comment. LaSalle Investment Management note policy relating to standalone totems or monolith features as well as seeking signage and advertising features to be of appropriate scale and innovatively incorporated into the built form of buildings, however maintain that such a control is beyond the scope of the Advertisement Control regime and regulations as the policy effectively predetermines that standalone totems or monolith features have an acceptable impact on visual amenity and/or highway safety. Suggest clarifying policy relating to signage incorporated into the built form of buildings to ensure that this is not imposed on all advertisement proposals.	Comment noted. Policy wording relating to tall and focal buildings has been amended and clarified. The advert regulations do allow for the consideration of the harm an advertising application may pose to visual amenity and do not presuppose all totems or monoliths are acceptable, but rather the basic principle. There is a proliferation of advertising across the GWC/M4 area as identified in draft Local Plan Review para 4.27 and the Council is seeking to encourage appropriately considered advertising and the reduction of visual clutter. While not seeking to resist all advertising, the Council considers it a justified approach to expect new applications to be considered as part of the built fabric of a development rather than as stand alone elements.
Hounslow Green Party (Non-profit organisation)	Hounslow Green Party agree that the positioning of advertising hoardings should be carefully considered due to luminosity/light clutter, impact upon residential areas and harm to wildlife. Hounslow Green Party do not agree that 'the council has consistently and successfully resisted and enforced against inappropriate advertisement installations'(p.58), and draw attention to the effect of a specific advertising hoarding on the disused 'Alfa Laval' building upon residents in Brentford (specifically residents on York Road). Hounslow Green Party request assurances that there will be detailed consultation on the exact positioning and hours of operation of illuminated advertising along the GW corridor and after-dark lighting of 'focal' buildings.	Comment noted. In determining advertisement consent applications, the Council has to behave reasonably and in accordance with Regulations, and must have due regard to appeal decisions. The Council will continue to carefully scrutinise lighting details when considering the visual amenity impacts relating to proposed advertisements. Lighting schemes for individual major developments can be considered as part of the planning application process.
Brentford East Collective	The Brentford East Collective (BEC) raises concerns regarding Policy	Comment noted. There is no reference in Policy GWC3

<b>GWC Design and Heritage</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	GW3 (Design and Heritage) in its current form. The Collective is supportive of principles of the Policy, however disagrees with the current drafting due to this being underpinned by the adoption of the draft Brentford East SPD, for which the Brentford East Collective is making separate representations.	to the Brentford East Planning and Design SPD and the policy is not framed in a way that it is dependent on the adoption of the SPD. The Council has decided not to take forward the SPD at this time. If and when it does decide to adopt the SPD, this will provide further guidance to GWC Plan policies.
Starbones Ltd (Company)	Starbones Ltd note that their client has significant concerns regarding Policy GW3 (Design and Heritage) in its current form; Starbones Ltd state that their client is supportive of principles of the Policy, particularly around delivering a landmark building to create a strengthened and identifiable character for the corridor at Chiswick Roundabout, however Starbones Ltd disagree with the way the policy is currently drafted, due to this being underpinned by the adoption of the draft Brentford East SPD, for which their client, and the Brentford East Collective, are making separate representations pursuant to.	Comment noted. There is no reference in Policy GWC3 to the Brentford East Planning and Design SPD and the policy is not framed in a way that it is dependent on the adoption of the SPD. It should be noted that the Council has decided to not take forward the SPD at this time. If and when it does decide to take this forward, the SPD will give further guidance to the GWC Local Plan policies. Support noted for the strategic vision for the area and the principle of a focal development to help strengthen local character and assist in delivering renewal of the area.
Orchard Road Residents Group (Community organisation)	The Orchard Road Residents Group (ORRG) state that the review addresses impacts affecting areas a considerable distance from the GWC but does not appear to have any concern for residential areas within the GWC. The ORRG agree with the importance of protecting these historic and World Heritage sites but state that the Victorian and Edwardian residential roads, also of historical and architectural merit within the GWC, should be offered some protection. ORRG request amendment of the GWC plan policy to give further consideration of the impact of any developments on adjacent Victorian and Edwardian roads in line with conservation area protection.	Comment noted. The GWC plan area includes a very limited amount of existing residential development. Nevertheless, plan policy requires any new development that comes forward to have a minimal impact on these areas. GWC5 requires that development proposals will be subject to a high quality and comprehensive design review process resulting in high quality design outcomes, and as such proposals will need to demonstrate that they have a positive relationship to the surrounding townscape context in terms of scale, streetscape and built form and have full regard to the significance of designated and non-designated heritage assets.
The Isleworth Society (Community organisation)	The Isleworth Society state that paras 2.27-2.29 fail to recognise that the scale and setting of existing art deco buildings are as important as their decorative features and request that new buildings should not be permitted to affect their setting. The Isleworth Society request that more protection should be afforded to maintaining views to the Art	Comment noted. Section 2 of the GWC document is entitled "Setting the Scene". The purpose of this section is to provide a baseline background to what features, issues and elements currently make up the Great West Corridor plan area. It goes on to discuss some of the

GWC Design and Heritage		
Respondent	Representation Summary	Council Response
	<p>Deco Gillette Building with its landmark clock tower from all angles but particularly from the south and south-west where high rise developments are proposed. The Isleworth Society request Figures 4.1 and 4.4 are updated accordingly and a distinction between Heritage and 'landmark' buildings be made in policy wording. The Isleworth Society acknowledge that section 2 the Plan recognises modern tall buildings can adversely affect vistas from Kew Gardens but consider that it fails to acknowledge the harm to views from Kew and Syon Park both Grade I heritage sites. The Isleworth Society maintain that no policy which promotes tall buildings which can harm views from listed buildings or Conservation Areas is acceptable. The Isleworth Society raise concern around the Plan failing to provide remedies for the challenges outlined, namely that further development will inevitably result in more vehicles along the A4/M4 which is the major west radial to Heathrow, and the west. The Isleworth Society consider a specific policy is needed to ensure that any development which crosses the existing skyline seen from Kew Gardens and Syon and to and from the River Thames should normally be refused. The Isleworth Society note that much of Brentford is in an "Open Space Deficiency Area" and request that new public open spaces need to be factored in to meet the standards set in the London Plan.</p>	<p>challenges facing the area but does not provide policy on how to achieve this. Whilst the comments raised regarding the setting of art deco buildings are noteworthy, these are suggestions that are in fact covered in the proposed policy GWC5 and adopted local plan policies. These policies are considered to be reasonable and justified responses to the evidence base and scale of development which has been coming forward, which seeks a comprehensive masterplanned co-ordinated response to managing development rather a scattered approach. Regarding recommendations for the inclusion on additional views it is not considered appropriate that every local or significant view be included in a plan of the Overall Spatial Strategy (Figure 4.1), but amendments to the plan for Design and Heritage (Figure 4.4) have been made to show views that relate to the Gillette Building. It is not considered that a distinction between heritage and focal buildings needs to be made as some heritage buildings could be focals. There is also often a misconception that focals mean height and this is not the case in the GWC Plan. A definition of focal has been added to the document for clarification purposes. The Council is committed to promoting an enhanced public transport network in the area and car-free developments where appropriate as detailed in policy GWC6. The Council understands the principle behind this comment relating to development crossing the established skyline, however it is not deemed acceptable to incorporate this into the policy approach. The Council accepts that some developments may come forward that would entail increases in height. For this reason, the evidence base has been prepared in a robust manner testing different height scenarios and the capacity for growth. The policy approach chosen</p>

GWC Design and Heritage		
Respondent	Representation Summary	Council Response
		stems from this work and is based on situations that can be demonstrated to result in the least to no impact on important heritage assets. Appropriate private and public amenity space will be sought, in accordance with policy, as part of any development proposal.
Paradigm Land Ltd (Company)	Paradigm supports the “Approach” of Draft Policy GWC3 “Design and Heritage”, particularly to deliver new places through a strong urban design-led approach, and supports the balanced way in which the plan will facilitate appropriate development (including focal buildings) in the context of the area’s heritage assets. Paradigm agrees with the inclusion of part (b) of the policy, which is consistent with the approach of the NDLP: “(b) Making best use of redevelopment opportunities whilst respecting and enhancing the area’s distinctive characters and historic environment.” While it supports the approach to delivering landmark buildings in the GWC corridor, Paradigm does not agree that Policy GWC3 should identify only three locations that are suitable for landmark buildings and consider that the policy should allow for applicants to demonstrate that a design-led approach can lead to focal buildings being located elsewhere in the GWC. Paradigm consider that, accordance with part (l) of Policy GWC3, the scale of those buildings should result from the findings of the design-led approach, rather than the LPR setting specific maximum heights within the place based polices.	Support welcomed. Comment noted. A definition clarifying focal has been added to the policy to remove any confusion. The policy is considered to be a reasonable and justified response to the evidence base and scale of development which has been coming forward, which seeks an urban design led approach which includes a comprehensive masterplanned co-ordinated response to managing development rather than a 'scattered', ad hoc approach. Providing a band of acceptable heights is compliant with the draft New London Plan and allows new development to appropriately address its setting and context. Applicants will still be entitled to submit scheme proposals that extend beyond the masterplan approach. These schemes will be considered within the policy context and tested against the Council's adopted and any emerging planning policies and guidance.
S. Grainger (Individual)	The respondent considers that an amendment of the GWC plan should be made to give further consideration of the impact of any developments within the GWC Area on adjacent Victorian and Edwardian roads, stating that this would then give some protection in line with a Conservation Area for the roads while being outside the GWC Area.	Comment noted. Any new development that comes forward should have a minimal impact on these areas. Draft submission GWC policy GWC5 requires that development proposals will be subject to a high quality and comprehensive design review process resulting in high quality design outcomes, and as such proposals will need to demonstrate that they have a positive relationship to the surrounding townscape context in terms of scale, streetscape and built form and have full regard to the significance of designated and non-designated heritage assets including their setting.

GWC Design and Heritage		
Respondent	Representation Summary	Council Response
St John's Residents Association (Community organisation)	<p>St John's Residents Association consider Section 2 fails to recognise that the scale and setting of existing Art Deco buildings are as important as their decorative features and states that new buildings should not be permitted to affect their settings. St John's Residents Association consider that more protection should be afforded to maintaining views to the Art Deco Gillette Building with its clock tower, recognised in the document as a landmark building. Views to the tower should be specifically protected from all angles but particularly from the south and south-west where high rise developments are proposed. St John's Residents Association suggest Figures 4.1 and 4.4 should illustrate this as a significant view and a distinction between Heritage and 'focal' buildings is made in policy wording and supporting text and to emphasise this point. St John's Residents Association acknowledge that the Plan recognises modern tall buildings can adversely affect vistas from Kew Gardens but consider that it fails to acknowledge the harm to views from Kew and Syon Park both Grade I heritage sites. St John's Residents Association consider that no policy promoting tall buildings which can harm views from listed buildings or Conservation Areas would be acceptable. The St John's Residents Association consider that a specific policy is needed to ensure that any development which crosses the existing skyline seen from Kew Gardens and Syon should normally be refused. St John's Residents Association states that the Plan fails to provide remedies for the challenges outlined in section 2, namely that further development will inevitably result in more vehicles movements along the A4/M4 which is the major west radial to Heathrow and the west. The St John's Residents Association note that the Plan refers to the remaining Art Deco buildings and the listed railings and entrance steps to the former to the former Firestone factory and request that policy requires any future proposals for this site should ensure that the steps and railings line up with the principal entrance to harmonise with the local surroundings. The St John's Residents Association suggest that reference should also be made to the importance of the former Pyrene building with its entrance that was restored in the early 1990s and which is on the Buildings at Risk</p>	<p>Comments noted. Section 2 of the GWC document is entitled ""Setting the Scene"". The purpose of this section is to provide a baseline background to what features, issues and elements currently make up the Great West Corridor plan area. It goes on to discuss some of the challenges facing the area but does not provide policy on how to achieve this. Whilst the comments raised regarding the setting of art deco buildings are noteworthy, these are suggestions that are in fact covered in the proposed policy GWC5 and adopted local plan policies. These policies are considered to be reasonable and justified responses to the evidence base and scale of development which has been coming forward, which seeks a comprehensive masterplanned co-ordinated response to managing development rather a scattered, ad hoc approach. Comment noted regarding recommendations for the inclusion on additional views. It is not considered appropriate that every local or significant view be included in the plan, however amendments to policy GWC5 and associated map have been made to show views that relate to the Gillette Building. Furthermore, it is considered that a distinction between heritage and focal buildings does not need to be made as some heritage buildings could be focal buildings. The Council considers that a 'focal' building does not necessarily suggest a tall building and this is not the approach taken in the GWC Plan. The Council understands the principle behind the comment relating to tall buildings, however it is not deemed acceptable to incorporate into the policy approach. The Council accepts that some developments may come forward that would entail increases in height. For this reason, the evidence base has been prepared in a robust manner, having tested</p>

GWC Design and Heritage		
Respondent	Representation Summary	Council Response
	<p>Register. Concern is also expressed at the closed Grade II listed National Westminster Bank building which is currently derelict. St John's Residents Association also draw attention to the Homebase building designed by Grimshaw Associates in 1987 which is considered to be of townscape merit and should be retained. The St John's Residents Association note that much of Brentford is in an "Open Space Deficiency Area" and request that new public open spaces need to be factored in to meet the standards set in the London Plan.</p>	<p>different height scenarios and the capacity for growth. The policy approach chosen stems from this work and is based on situations that can be demonstrated to result in the least to no impact on important heritage assets. The Council is committed to promoting an enhanced public transport network in the area and car-free developments where appropriate, as detailed in draft submission GWC Plan policy GW6. In relation to your comment re. the former Firestone Factory site, this would be best addressed as part of a site-specific planning and design brief and adopted Local Plan policy CC2(i) does provide a policy basis in this direction. Applicants will also be expected and advised to take such context in to consideration when formulating proposals. The significance of West Link House (Pyrene Building) is already acknowledged in that it is a Grade II Listed Building. Adopted Local Plan policy CC4(x) is specifically focused on Listed Buildings at Risk. Concern re the National Westminster Bank building and Homebase is noted. Appropriate private and public amenity space will be sought, in accordance with policy, as part of any development.</p>
H. Mortimer (Individual)	<p>The respondent does not believe tall buildings should be allowed where this may harm views from listed buildings or conservation areas. The respondent does not support either the "scattered" or the "Co-ordinated" approach to tall buildings in the GWC area. The respondent states that the A4 is a very busy multi-lane highway connecting central London with Heathrow and the West of England and suggests that sufficient space must be made available for cyclists, bus stops and pedestrian crossings to allow for increased use by buses, cycle users and pedestrians, and that new buildings should be set back to allow this.</p>	<p>Comments Noted. The Council accepts that some developments may come forward that would entail increases in height. For this reason, the evidence base has been prepared in a robust manner that tests different height scenarios and capacity for growth through both the Scattered and Coordinated options. The policy approach chosen (Coordinated Approach) stems from this work and is based on situations that can demonstrate the least to no impact on important heritage assets. The Council needs to conduct itself in a fair and balanced manner and growth pressures cannot be ignored outright, therefore in an effort to strike a</p>

GWC Design and Heritage		
Respondent	Representation Summary	Council Response
		balance the Coordinated Approach to tall buildings has been chosen. The GWC Plan provides a series of policy recommendations to enhance the pedestrian, cycle and public transport experience along the A4 and these are detailed in draft submission GWC plan policy GWC6.
P. Harding (Individual)	The respondent questions whether the vision, which is supported, can be delivered given the impacts of the anticipated level of growth in the area. The respondent supports the plan's proposal to improve the public realm, particularly improving the greenness of the area, tree planting, upgrading paths and walkways, repairing listed buildings, providing attractive pedestrian and cycling routes, enhancing opportunities for recreation and a healthy lifestyle, taking measures to minimise pollution, conserving and enhancing existing biodiversity habitats. However, the respondent raises concerns around how this vision will be achieved when a significant increase in building works and an influx of new residents and workers will impact on the environment in terms of: the disruption caused when building is taking place, increased traffic congestion and more pollution.	Comments noted. It is considered that the policies set out in the draft submission version of the GWC local Plan review will allow for both aims to be accommodated. The anticipated level of growth will unlock further environmental improvements in the area and policy GWC7 sets out how growth will be supported by infrastructure.
T. Henderson (Individual)	The respondent disagrees with the significance of the panoramic view identified from Osterley House in Fig 4.4.	Comment noted. It is unclear however whether this response indicates whether the view is under or overvalued. The Council has identified this view as an important view and it is difficult to consider on what grounds an amendment could be made without further detail.
The Kew Society (Charity)	The respondent agrees with the preferred policy option and support various points contained therein, but requests that policies need to better reflect the importance of design in respecting the sightlines and vistas from heritage assets.	Comments not red and agreed. The Council considers that the amended Policy GWC5 and Place policies of the draft submission version of the plan in calling on developments to protect and where possible enhance strategic and local views.
LB Hounslow Public Health (Government)	LB Hounslow Public Health recommends that reference is made to the role of design and heritage in supporting health, including a requirement that heritage is included in a well signposted network of active travel routes (e.g. walking, cycling).	Comment noted. The Council supports the relationship between good design and health. A reference to this has been added to policy GWC3(c).
D. O'Leary (Individual)	The respondent considers that the Design and Heritage preferred policy	Comment noted. Amended policy GWC5 requires that

<b>GWC Design and Heritage</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	option does not go far enough to preserve the Victorian element of the town, which should be preserved. The respondent does not agree with the preferred policy option for landmark buildings. The respondent states that Hounslow Council does not seem to have any consideration for heritage and the roads north of the railway, including Orchard Road, are unique Victorian terraces which are not even included in the conservation area.	new developments preserve and enhance heritage assets, including Victorian townscapes. This is in addition to Policy CC4 of the adopted Local Plan and London Plan policy 7.8. The scope and coverage of any Conservation Areas are not part of this consultation, however a separate consultation on the St Paul's Conservation Area was in 2019 and following consideration of responses from that consultation Orchard Rd is being considered for inclusion within the St Paul's Conservation Area boundary.
London Diocesan Fund (Company)	The London Diocesan Fund support the Design and Heritage preferred policy option which aims to manage the impact of new development, including tall buildings and ensure that new development contributes positively to its surroundings, and agrees with the preferred policy option for landmark buildings	Support welcomed.
A. Allanach (Individual)	The respondent agrees with the Design and Heritage preferred policy option and the preferred policy option for landmark buildings.	Support welcomed.
E. Guerst (Individual)	The respondent does not agree with the Design and Heritage preferred policy option as they consider that tall buildings should not be used as noise/air pollution screens. The respondent requests that the plan includes page numbers to aid reference.	Comment Noted. Tall buildings are not proposed as a design intervention to mitigate air and noise pollution in and of themselves. Policy GWC3 requires a range of measures to be used to mitigate air and noise pollution, with siting and location of buildings recommended as one option where this is appropriate. The GWC preferred options draft plan did include page numbers.

<b>GWC4 Environmental Quality and Open Space</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
Port of London Authority (Government)	Port of London Authority (PLA) welcome that the various waterways which make up the borough's blue corridors are recognised throughout the document. The PLA also welcome reference to the enhancement of green and blue infrastructure supporting enhanced links to the River Thames as this is in line with PLAs Vision for the Tidal Thames document (2016). The PLAs Thames Vision also includes a goal to increase	Support noted.

GWC4 Environmental Quality and Open Space		
Respondent	Representation Summary	Council Response
	participation in sport and recreation on and alongside the river (supported by policy 7.27 of the 2016 London Plan, on supporting infrastructure and recreational use of the Blue Ribbon Network) and the PLA would support proposals that increase sports and recreation opportunities along the boroughs waterways.	
M. Middleton-Smith (Individual)	The respondent states that sections 2.21 – 2.26 make no mention of present day Aircraft emissions from the over used approach paths directly ahead and there is no mention of the increased aircraft movements from 700 extra aircraft movements.	Comment noted. LB Hounslow are engaging with Heathrow Airport Ltd. through the Heathrow Spatial Planning Group (HSPG) to raise issues relating to airport expansion around environmental impacts and to secure the most suitable and practical mitigation and compensation package to address any adverse impacts.
Canal and River Trust (Non-profit organisation)	The Canal and Rivers Trust (CRT) welcomes policies enhancing the canal towpath as a walking and cycling route, and improving connections to it from surrounding areas and to other green and blue spaces. Further support for the allocation of developer contributions toward these improvements but also request canalside developments be required to contribute further to enhancements of the canal network. CRT suggest improving links to the canal, including safe routes and improved wayfinding to promote the resource for health and wellbeing and sustainable transport purposes. CRT welcome canal being identified as a Local Green Grid Strategic Corridor, however express concern over two new 'Pedestrian/Cycle/Railway Bridges' over the canal.	Comment noted. Further detail has been provided in new policy GWC3 Health and Wellbeing, and amendments made to Environmental policy GWC4 and GWC Place Policy P2.
Brentford Community Council (Community organisation)	Brentford Community Council (BCC) would oppose any development in Gunnersbury Park or the Brentford Parks, including proposals for school buildings, and recommend that a specific policy is included to this effect. The BCC request that development near Gunnersbury Park and the Brentford Parks should be of limited height and bulk to ensure that no harm is created.	Comment noted. There are no proposals in the plan for development on designated Open Spaces found within or surrounding the GWC area. Policy GWC5 sets out detailed design policy requirements including that development be subject to a high quality and comprehensive design review process.
West Chiswick and Gunnersbury Society (Community organisation)	The West Chiswick and Gunnersbury Society (WCGS) welcome policy GWC4, however concern is raised on a number of points. WCGS claim that encouraging people to live close to their workplace in the GWC would lead to poor living conditions given hostile environment. WCGS state that existing open spaces in and surrounding the GWC suffer from air and noise pollution from strategic roads, and this detracts from their	Comment noted. The Local Plan Review recognises the challenge of the severely constrained availability of sites in the East of the borough to accommodate much needed housing and employment floorspace. New policy GWC3 seeks to ensure that less sensitive non-residential uses provide a buffer between the areas of worst air and

GWC4 Environmental Quality and Open Space		
Respondent	Representation Summary	Council Response
	<p>role as spaces for active recreation and/or quiet enjoyment. WCGS raise concern over detrimental impact of light pollution on biodiversity/wildlife. WCGS question the practicality and viability of planting mature trees and whether external amenity can be provided without recourse to enclosed balconies/winter gardens which do not provide a substitute for outdoor spaces. WCGS acknowledge that supporting text shows how bad the environment of the GWC but claim that taking the measures described will not necessarily provide acceptable living conditions. Suggest the Council gives its support to making London a “National Park City”.</p>	<p>noise pollution and more sensitive residential uses. GWC3 also requires site and building design to minimise pollution impacts through the provision of noise and vibration insulation, locating sensitive uses away from existing or planned sources of air and noise pollution, provision of winter gardens and balconies and the use of greenery to act as a buffer along the A4/M4 corridor and other streets. GWC4 has been updated to include more detail on measures to improve biodiversity and urban greening. It is worth noting the applications will need to consider health and wellbeing during the design stages and use Best Available Techniques (BATs) to mitigate and minimise any adverse effects on health and quality of life (e.g. noise, air or light pollution, etc.). Proposals for major development schemes should also be supported by Noise Assessment, Air Quality Assessment (AQA) and Health Impact Assessment (HIA).</p>
LaSalle Investment Management (Company)	<p>LaSalle Investment Management object to criterion e) which requires less sensitive non-residential uses be sited adjacent to the Great West Road/M4, acting as a physical buffer between the road and more sensitive uses to the rear. The respondent claims that this would prevent redevelopment of 27 Great West Road being able to maximise the site’s development potential and would affect scheme viability. LaSalle suggest other design measures are available to address noise and air pollution impacts. LaSalle Investment Management raise concerns relating to proposed parallel pedestrian/cycle route cutting through the allocated 27 Great West Road site, as well as a new public space and a new pedestrian/cycle railway bridge, as it is likely to make the delivery of redevelopment of 27 and 1053 Great West Road unviable. Respondent suggests that these factors could block the development potential of the site if the feasibility and funding mechanisms are not clearly demonstrated.</p>	<p>Objection noted. The Local Plan Review recognises the challenge of the severely constrained availability of sites in the East of the borough to accommodate much needed housing and employment floorspace. Policy GWC3 seeks to ensure site and building design minimises exposure to elevated levels of air and noise pollution through a number of means, including locating sensitive uses away from existing or planned sources of air and noise pollution through the siting of less sensitive non-residential uses to act as a physical buffer between the roads and more sensitive uses to the rear, and through the provision of noise and vibration insulation, winter gardens and balconies, and the use of greenery to act as a “buffer” along the A4/M4 corridor and other streets. The proposed parallel walking and cycling routes set out in strategic policy GWC6 and place policies P1, P2 and P3 would enable residents to engage in active travel</p>

GWC4 Environmental Quality and Open Space		
Respondent	Representation Summary	Council Response
		throughout the area in a safer environment, in accordance with the Mayor's Healthy Streets approach. The routes would make sites more attractive to future employees and residents and it is considered that these would add value to developments immediately adjoining. Further details of how this will be delivered are set out in GWC7 and the IDP.
Hounslow Green Party (Non profit organisation)	Hounslow Green Party welcome the emphasis on improving the overall greenness of the area and improving accessibility to surrounding parks. Hounslow Green Party acknowledge the value of setting residential developments back from the road with 'less sensitive' buildings acting as buffers in front, however it is stated that the mitigation measures proposed for air pollution and noise are inadequate given the effects of vegetation in a very polluted area are minor, the housing will still be subject to bad air quality and people will still be working in the 'less sensitive' buildings. Hounslow Green Party state that the only real means of cutting air pollution and noise in this area is to reduce the volume of traffic and introduce lower speed limits. Hounslow Green Party note new and improved pedestrian and cycle routes proposed, but would like to see more radical measures included at the early stages of planning, including: enforced speed limits along the Golden Mile; a 'Mini-Holland' type scheme to make nearby roads unattractive to drivers and attractive to walkers and cyclists; a bus lane along the whole 'golden mile' section of the A4; more detailed plans to limit car parking, including business parking; the Ultra-Low Emission Zone and Zero Emissions Bus Zone to be extended to cover the area; and stronger representations from the council against the 3rd runway at Heathrow, as the new flight path would be directly overhead. Hounslow Green Party find it misleading that the 3rd runway is not mentioned in this section on environmental quality.	"Comment noted. The Local Plan Review recognises the challenge of the severely constrained availability of sites in the East of the borough to accommodate much needed housing and employment floorspace. Policy GWC3 seeks to ensure site and building design minimises exposure to elevated levels of air and noise pollution through a number of means, including locating sensitive uses away from existing or planned sources of air and noise pollution through the siting of less sensitive non-residential uses to act as a physical buffer between the roads and more sensitive uses to the rear, and through the provision of noise and vibration insulation, winter gardens and balconies, and the use of greenery to act as a "buffer" along the A4/M4 corridor and other streets. Planning applications will need to consider health and wellbeing at design stage and use Best Available Techniques (BATs) to mitigate and minimise any adverse effects on health and quality of life (e.g. noise, air or light pollution, etc.). Proposals for major development schemes should also be supported by Noise Assessment, Air Quality Assessment (AQA) and Health Impact Assessment (HIA). In addition, the draft submission version of the Plan has been prepared in accordance with draft London Plan policy SI1 by aiming to become Air Quality Positive through implementing measures across the area that will actively reduce air pollution, including: parallel clean air routes for

GWC4 Environmental Quality and Open Space		
Respondent	Representation Summary	Council Response
		pedestrians and cyclists, limiting the provision of car parking where appropriate and managing the use of existing parking through the potential introduction of a Workplace Parking Levy, introducing Electric Vehicle (EV) charging spaces and the accommodation of car clubs, working with TfL and bus operators to develop zero exhaust emission bus services and routes along the Corridor, and requiring developments to increase urban greening through scheme design. Heathrow expansion is not within the purview of the Plan however LB Hounslow continues to engage with Heathrow on cross-boundary strategic matters including environmental impacts and securing appropriate mitigation for such.
The Isleworth Society (Community organisation)	The Isleworth Society request that specific policies should be included to reduce traffic speeds, introduce traffic controlled pedestrian crossings, ensure schools are not built on open spaces and support completion of the Thames Path.	Comment noted. The draft submission version of the Plan has been prepared in accordance with draft London Plan policy SI1 by aiming to become Air Quality Positive through implementing measures across the area that will actively reduce air pollution, including: parallel clean air routes for pedestrians and cyclists, limiting the provision of car parking where appropriate and managing the use of existing parking through the potential introduction of a Workplace Parking Levy, introducing Electric Vehicle (EV) charging spaces and the accommodation of car clubs, working with TfL and bus operators to develop zero exhaust emission bus services and routes along the Corridor, and requiring developments to increase urban greening through scheme design. The GWC plan does not allocate any open space for schools. The Thames Path does not pass through the GWC area.
St John's Residents Association (Community organisation)	The St John's Residents Association note the reference to air pollution and noise being a significant issue along the Great West Corridor and share those concerns. St John's Residents Association suggest that the Council should not grant permission for any housing developments in	The Local Plan Review recognises the challenge of the severely constrained availability of sites in the East of the borough to accommodate much needed housing and employment floorspace. Policy GWC3 seeks to ensure

GWC4 Environmental Quality and Open Space		
Respondent	Representation Summary	Council Response
	<p>areas which currently demonstrate these [sic] such as at Chiswick roundabout. The St John's Residents Association suggest specific policies should be included to reduce traffic speeds, introduce traffic controlled pedestrian crossings, ensure schools are not built on open spaces, support completion of the Thames Path.</p>	<p>site and building design minimises exposure to elevated levels of air and noise pollution through a number of means, including locating sensitive uses away from existing or planned sources of air and noise pollution through the siting of less sensitive non-residential uses to act as a physical buffer between the roads and more sensitive uses to the rear, and through the provision of noise and vibration insulation, winter gardens and balconies, and the use of greenery to act as a "buffer" along the A4/M4 corridor and other streets. Comment noted on traffic controlled pedestrian crossings, ensure schools are not built on open spaces, support completion of the Thames Path, some of these have been included in Policy GWC4 and GWC6</p>
<p>Friends of the Earth - Hounslow and Brentford (Non-profit organisation)</p>	<p>Friends of the Earth state that the major improvements that would follow from new and renewed rail links are not guaranteed and suggest that air pollution is likely to continue at unacceptable levels for too long. Friends of the Earth advise that as the council is responsible for air pollution limits it could find itself in breach of limits so its lawyers need to look at this.</p>	<p>Comments noted. The draft submission version of the Plan has been prepared in accordance with draft London Plan policy SI1 by aiming to become Air Quality Positive through implementing measures across the area that will actively reduce air pollution, including: parallel clean air routes for pedestrians and cyclists, limiting the provision of car parking where appropriate and managing the use of existing parking through the potential introduction of a Workplace Parking Levy, introducing Electric Vehicle (EV) charging spaces and the accommodation of car clubs, working with TfL and bus operators to develop zero exhaust emission bus services and routes along the Corridor, and requiring developments to increase urban greening through scheme design.</p>
<p>T. Henderson (Individual)</p>	<p>The respondent questions why no reference is made to the potential issue of increased aircraft noise in the Great West Corridor from an expanded Heathrow airport. The respondent state that the National Air Quality Plan is calling for a feasibility study to be done for measures to achieve compliance along the M4 in Brentford and suggests that the</p>	<p>Comment noted. The draft submission version of the Plan has been prepared in accordance with draft London Plan policy SI1 by aiming to become Air Quality Positive through implementing measures across the area that will actively reduce air pollution, including: general</p>

GWC4 Environmental Quality and Open Space		
Respondent	Representation Summary	Council Response
	<p>outcome of this may affect policy. The respondent forcefully opposes Heathrow expansion and supports tougher measures to decrease diesel vehicle operation and extend the Mayor of London ULEZ proposals along the A4/M4 corridor to Heathrow and the M25 as soon as possible. The respondent recommends continuing to encourage sustainable transport of walking and cycling in the borough particularly for journeys to and from school and work, better enforcement of parking restrictions around schools and appropriate policing of the travel agreements adopted at new schools in Osterley.</p>	<p>enhancements of walking and cycling routes throughout the area, limiting the provision of car parking where appropriate and managing the use of existing parking through the potential introduction of a Workplace Parking Levy, introducing Electric Vehicle (EV) charging spaces and the accommodation of car clubs, working with TfL and bus operators to develop zero exhaust emission bus services and routes along the Corridor, and requiring developments to increase urban greening through scheme design. The ULEZ is part of a package of measures the Mayor and TfL are putting in place to address London's air pollution. The ULEZ will extend up to the North and South Circular roads from 25 October 2021. LB Hounslow continues to advocate for a 'better not bigger' Heathrow. LB Hounslow Council is in discussions with Heathrow to understand the impact of a third runway for increased aircraft traffic noise in the Great West Corridor and the borough more generally and will continue to engage with Heathrow on cross-boundary strategic matters, including environmental impacts, and to secure appropriate mitigation for such.</p>
The Kew Society (Charity)	<p>The Kew Society state that there needs to be more consideration for reducing levels of pollution that already exceed legal guidelines and recommend that a way be found to reduce the volume of traffic and light pollution associated with proposed development via measures such as the improvement in access to, and provision of, public transport; or some form of Low Emission Zone in areas of high residential concentration.</p>	<p>Comment noted. Issues relating to pollution have been addressed in updated policy GWC3 and the issue on reducing traffic volume has been addressed in Policy GWC5.</p>
LB Hounslow Public Health (Government)	<p>LB Hounslow Public Health recommend including a requirement for signposting to a joined up network of pedestrian and cycle routes, with references made to the role and requirement of open space to support health improvements and reduce health inequalities in the borough.</p>	<p>Comment noted. Draft submission policy GWC3 sets out how the Council will promote active lifestyle choices by supporting proposals that provide an enhanced walking and cycling network linking workplaces and homes with surrounding neighbourhoods, play areas, open spaces and recreational and leisure facilities, and those which</p>

GWC4 Environmental Quality and Open Space		
Respondent	Representation Summary	Council Response
		retain and improve facilities such as leisure facilities and open spaces.
D. O'Leary (Individual)	The respondent does not agree with the Environmental Quality and Open Space preferred policy option and states that Brentford air quality is seriously blighted by Heathrow from both planes and road access. The respondent recommends that the Council oppose Heathrow 3rd runway extension and campaign for a better not a bigger Heathrow. The respondent suggests more planting of trees to absorb noise and pollution.	"Comment noted. The draft submission version of the Plan has been prepared in accordance with draft London Plan policy SI1 by aiming to become Air Quality Positive through implementing measures across the area that will actively reduce air pollution, including: general enhancements of walking and cycling routes throughout the area, limiting the provision of car parking where appropriate and managing the use of existing parking through the potential introduction of a Workplace Parking Levy, introducing Electric Vehicle (EV) charging spaces and the accommodation of car clubs, working with TfL and bus operators to develop zero exhaust emission bus services and routes along the Corridor, and requiring developments to increase urban greening through scheme design - including tree planting where appropriate. Heathrow expansion is not within the purview of the Plan however LB Hounslow continues to engage with Heathrow on cross-boundary strategic matters including environmental impacts and securing appropriate mitigation for such.
London Diocesan Fund (Company)	The London Diocesan Fund agrees with the Environmental Quality and Open Space preferred policy option.	Support welcomed.
A. Allanach (Individual)	The respondent agrees with the Environmental Quality and Open Space preferred policy option.	Support welcomed.
E. Guerst (Individual)	The respondent states that Environmental Quality and Open Space preferred policy option will not be achievable until Government acts on the scandalous levels of air pollution in many parts of the UK, and especially in Hounslow. The respondent recommends that GWC is made into an Ultra Low Emissions Zone, and Heathrow expansion is stopped.	Comment noted. Air Quality is dealt with in Policy GWC3. The ULEZ is part of a package of measures the Mayor and TfL are putting in place to address London's air pollution. The ULEZ will extend up to the North and South Circular roads from 25 October 2021. Hounslow continue to advocate for a 'better not bigger' Heathrow and are engaging with the Heathrow Airport Ltd. through the Heathrow Spatial Planning Group (HSPG) to raise

<b>GWC4 Environmental Quality and Open Space</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
		issues relating to airport expansion around environmental impacts and to secure the most suitable and practical mitigation and compensation package to address any adverse impacts.

<b>GWC5 Transport and Connectivity</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
The Isleworth Society (Community organisation)	The Isleworth Society note that the Plan indicates an alternative approach if “the game-changing infrastructure” is not operating within the plan period and will be determined by “The Transport Impact Assessment”. The Isleworth Society state that as this document has not been made available the alternative approach is pure conjecture.	Comments noted. Work on the GWC Strategic Transport Study has been undertaken with TfL throughout plan preparation. This Study has now been published alongside the draft submission version of the GWC Plan as a key evidence base document.
St John's Residents Association	St John's Residents Association note that the Plan indicates an alternative approach if “the game-changing infrastructure” is not operating within the plan period and will be determined by “The Transport Impact Assessment”. St John's Residents Association state that as this document has not been made available the alternative approach is pure conjecture.	Comments noted. Work on the GWC Strategic Transport Study has been undertaken with TfL throughout plan preparation. This Study has now been published alongside the draft submission version of the GWC Plan as a key evidence base document.
H. Simpson (individual)	"The respondent supports more provision for cyclists along the A4 corridor between Isleworth and Chiswick Roundabout and raises safety and other issues with existing provision. The respondent also raises concerns around existing poor air quality given local, school-based traffic and notes that improvements to safety and attractiveness of cycle infrastructure would address this whilst supporting a healthy lifestyle for the borough's residents. "	Support noted. Promoting active travel to and from schools and community facilities is an important part of achieving healthy lifestyles and reducing traffic congestion at peak drop-off periods and this is reflected in draft submission plan policy GWC6 and Place policies P1, P2 and P3. The Council will continue to work with TfL, land owners, and local stakeholders to improve the cycling provision across the borough, including along the A4.
C. Dodds (Individual)	The respondent states that the commitment to improving transport does not seem sufficient given increases in residents following already approved development such as the Lionel Road Stadium scheme, and questions why there is no mention made of improvements to Gunnersbury station given existing capacity issues and future demand	Comments noted. The Council has undertaken an extensive Strategic Transport Study to ensure that the transportation network can handle the additional capacity that is needed as development comes forward. Gunnersbury Park Station and car park has been

GWCS Transport and Connectivity		
Respondent	Representation Summary	Council Response
	by commuters when connected to proposed enhanced bus services serving the areas. The respondent also states that the proposed CS9 takes space away from pedestrians and public transport which does not accord with the plan.	allocated as a development site in the draft submission version of the GWC Plan for enabling development to provide station capacity and accessibility improvements. The Council is working with TfL to ensure the CS9 infrastructure provides the maximum benefits to cyclists, pedestrians, and road users in the Borough
S. Lambourn (Individual)	The respondent notes that the Boston Manor Road protected cycleway was approved by councillors in January 2015 and urges the council to progress with building this important and strategic link. The respondent welcomes the proposals for a traffic free cycle link between Boston Manor Underground station and the Sky complex (The Boston Manor Boardwalk) and states that these routes need to be wide enough to be shared comfortably. The respondent states that the Lionel Road cycle route needs to both avoid conflict with pedestrians and be protected from motor vehicles and requests that Hounslow Council and the London Assembly discuss with TfL how the degraded A4 cycleways referred to in the plan can be upgraded to a continuous standard of protection with clear unobstructed routes. The respondent welcomes the emphasis on improving crossings at busy junctions and asks for protected cycle routes to be installed at these junctions.	The Council will continue to show support for the Boston Manor Boardwalk, and will work with the stakeholders involved to plan the most effective and safe route appropriate, particularly in areas where it is to be a shared or segregated pathway. The proposed route of the Boston Manor Boardwalk shown on plans is indicative and has been proposed to give the most direct access from the Sky campus to Boston Manor tube. The Council is working with TfL to carry out improvements to the cycling facilities along the A4 and Boston Manor Road, and to improve pedestrian and cycle crossings on the A4 to improve permeability.
H. Mcnestry (Individual)	The respondent states that the Council needs to make the A4 junctions much safer.	Comment noted. The Council will continue to work with TfL to improve and optimise junctions along the A4.
S. Birnie (Individual)	The respondent notes that the Boston Manor Road protected cycleway was approved by councillors in January 2015 and urges the council to progress with building this important and strategic link. The respondent welcomes the proposals for a traffic free cycle link between Boston Manor Underground station and the Sky complex (The Boston Manor Boardwalk) and states that these routes need to be wide enough to be shared comfortably. The respondent states that the Lionel Road cycle route needs to both avoid conflict with pedestrians and be protected from motor vehicles and requests that Hounslow Council and the London Assembly discuss with TfL how the degraded A4 cycleways referred to in the plan can be upgraded to a continuous standard of protection with clear unobstructed routes. The respondent welcomes	Comments noted. The Council will continue to show support for the Boston Manor Boardwalk, and will work with the stakeholders involved to plan the most effective and safe route appropriate, particularly in areas where it is to be a shared or segregated pathway. The proposed route of the Boston Manor Boardwalk shown on plans is indicative and has been proposed to give the most direct access from the Sky campus to Boston Manor tube. The Council is working with TfL to carry out improvements to the cycling facilities along the A4 and Boston Manor Road, and improve pedestrian and cycle crossings on the A4 to improve connectivity and

<b>GWC5 Transport and Connectivity</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	the emphasis on improving crossings at busy junctions and asks for protected cycle routes to be installed at these junctions, and welcomes including cycling as part of an active public realm.	permeability. The Council views improvements to cycling infrastructure as critical aspect of encouraging healthy communities and enhancing the public realm.
Port of London Authority (Government)	The Port of London Authority (PLA) state that this section should recognise that the Kew Pier River bus stop is located approximately a 10 minute walk away from Kew Bridge rail station, offering another transport option that could be utilised by existing and future residents. The PLA Vision includes a goal to double the number of people travelling by River by 2035 and this should be recognised in this review and the Draft Brentford East SPD to ensure consistency.	Comment noted this has been taken forward in Great West Corridor East Place Policy: P3
A. Moore (Individual)	The respondent notes that the Boston Manor Road protected cycleway was approved by councillors in January 2015 and urges the council to progress with building this important and strategic link. The respondent welcomes the proposals for a traffic free cycle link between Boston Manor Underground station and the Sky complex (The Boston Manor Boardwalk) and states that these routes need to be wide enough to be shared comfortably. The respondent states that the Lionel Road cycle route needs to both avoid conflict with pedestrians and be protected from motor vehicles and requests that Hounslow Council and the London Assembly discuss with TfL how the degraded A4 cycleways referred to in the plan can be upgraded to a continuous standard of protection with clear unobstructed routes. The respondent welcomes the emphasis on improving crossings at busy junctions and asks for protected cycle routes to be installed at these junctions, and welcomes including cycling as part of an active public realm.	Comments noted. The Boston Manor cycleway is proposed to be extended further. The Council will continue to show support for the Boston Manor Boardwalk, and will work with the stakeholders involved to plan the most effective and safe route appropriate, particularly in areas where it is to be a shared or segregated pathway. The proposed route of the Boston Manor Boardwalk shown on plans is indicative and has been proposed to give the most direct access from the Sky campus to Boston Manor tube. The Council is working with TfL to carry out improvements to the cycling facilities along the A4 and Boston Manor Road, and to improve pedestrian and cycle crossings on the A4 to improve connectivity and permeability. The Council views improvements to cycling infrastructure as critical aspect of encouraging healthy communities and enhancing the public realm.
Kew Bridge Distribution Centre (Company)	Kew Bridge Distribution Centre state that requirement for any scheme to integrate a pedestrian route through the site is accepted and reflected in updated masterplanning work. Kew Bridge Distribution Centre are supportive of the proposed Lionel Road Station and the Council's aspiration to deliver this, as it will likely support the overall attractiveness of the area to residents and visitors, and sustain higher density development through improving the PTAL and sustainability of	Comments noted. The Council will continue to support and promote improved connectivity across rail infrastructure at strategic points. The policy language has been revised to clarify that the Council will be promoting the delivery of this piece of infrastructure. (Policy P3)

GWC5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	<p>surrounding sites. Kew Bridge Distribution Centre state that the reference to a pedestrian link over the railway line from the site connecting it to the river should be made clear as an aspiration given the likely costs and complexities for delivery in terms of land ownership, infrastructure requirements, feasibility and viability. Kew Bridge Distribution Centre suggest that this not be included as a specific policy requirement but as a desirable feature, for which masterplanning consideration can be made so as not to prohibit future delivery should funding and land ownership be secured and resolved.</p>	
Canal and Rivers Trust (Non-profit organisation)	<p>The Canal and Rivers Trust (CRT) state that increased employment development should contribute to the provision of good quality safe walking and cycling routes, conservation and improvement of green and blue space provision and access to it. CRT request that the link between the development areas and the Grand Union Canal should be enhanced to promote the use of the canal space for wellbeing, exercise and as a sustainable transport route for walking and cycling, and that improvements to the towpath and its environment should be supported by the developments (particularly waterside sites) and that this be supported by policies. CRT welcomes all of the approaches in this policy, but suggest these could be enhanced by specifying commitment to improving the canal towpath for walking and cycling and request that the Trust would like be recognised as a strategic partner.</p>	<p>Comments noted. This approach has been taken forward in the Regulation 19 GWC Local Plan Review draft. The Council will continue to engage with CRT as a strategic partner when appropriate. Amended policy has been strengthened to clarify the improvements to pedestrian and cycle connections, including connections to and along waterways.</p>
Brentford Community Council (Community organisation)	<p>The Brentford Community Council (BCC) considers the final Local Plan should state that sites which have low PTAL ratings at the time an application is lodged should normally be refused. The BCC state that the history of under-funded or un-let commercial buildings on the A4 suggests that planning consents for further office buildings granted before public transport has been substantially improved will lead to further conversions of commercial sites for residential uses. The BCC considers that successful housing development will depend on, and must only follow after transport access has been significantly improved. The BCC note that adopted Local Plan policy TP2 specifically seeks to regenerate Brentford and suggest that connectivity proposed in this plan should radiate from Brentford Town Centre. The BCC state that the</p>	<p>Comments noted. The Council has undertaken an extensive Strategic Transport Study to ensure that the transportation network can handle the additional capacity that is needed as development comes forward. An Article 4 direction has been in place since January 18 and restricts office to residential conversions within designated employment areas. Any new office development are exempt from conversion to residential use by the provision of Class O, Part 3, Schedule 2 of the General Permitted Development Order (as amended). Development phasing has been considered in the draft submission version of the Plan to ensure that</p>

GWC5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	<p>Alternative Approach may also be impracticable if the Transport Impact Assessment leads to land use proposals which do not conform with the Planning policies set out in the London Plan and adopted Local Plan. The BCC acknowledge that it could be possible turn the A4 into a street if measures are taken to significantly reduce traffic volumes, however it is considered that those measures would be drastic and very costly and are unlikely to be achieved before 2030.</p>	<p>development is delivered to coincide with improvements to public transport accessibility. As the GWC Plan review is focused on the GWC opportunity area, connections will be shown to radiate from the GWC area, however connections to Brentford will be crucial for the successful revitalisation of this area and this has been carefully considered in the Plan. Transport policies set out in the GWC Plan review are in conformity with relevant London Plan and Local Plan (2015) policies. Policy GW6 has been amended and updated to align with the Mayor's Healthy Streets approach.</p>
<p>West Chiswick and Gunnersbury Society (Community organisation)</p>	<p>The West Chiswick and Gunnersbury Society (WCGS) agree that providing transport infrastructure is critical but consider it necessary to remedy existing transport deficiencies before any further growth is considered. WCGS note that the analysis of the current road capacities and of PTAL supports their position. WCGS note that the Council and key stakeholders have begun to assess the viability and feasibility for the first two necessary “game-changing infrastructure” projects, however it is considered that these projects, even if agreed, would not be delivered within the time frame of the GWC Plan. WCGS note that Project 2 (Lionel Road Station: Old Oak Common - Hounslow Overground Link) would not commence until at least 2025, even if it met the viability/feasibility hurdles, and state that this is essential to support any significant development within Brentford East. The WCGS state that the Council is unable to give any assurance that the major transport improvements on which the entire strategy for the GWC depends will be delivered as this is dependent on other bodies, with the Council only being able to support and facilitate delivery. WCGS recognise that delivery is often very complex with many stakeholders involved but question the Council’s track-record on supporting/facilitating. The WCGS state that the Alternative Policy Option transportation strategy would not be able to deliver a sufficient improvement to allow more than very modest levels of development, and that significant growth would not be sustainable. WCGS consider</p>	<p>Comments noted. The Council has assessed the deliverability of the Brentford-Southall Crossrail link and the West London Orbital link and considers them deliverable within the plan period. More details of this can be found in the IDP. The Council has undertaken an extensive Strategic Transport Study with TfL to ensure that the transportation network can handle the additional capacity that is needed as development comes forward, and the study has informed the development of policy GWC6. Development phasing has been carefully considered in the draft submission version of the GWC Plan review to ensure that development is delivered to coincide with improvements to public transport accessibility.</p>

GWC5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	the heavy congestion on the road network will make proposed improvements to bus services very challenging as this will depend on offering both frequent and reliable services. The WCGS state that if the Council finds it necessary to adopt this alternative policy option, it will also need to adopt the alternative policy options applicable to growth.	
TfL (Government)	<p>TfL consider that overall the transport and connectivity challenges are well summarised within the document and notably Section 2. However, TfL request that the relationship with other emerging Local Plans, most notably the West of Borough Local Plan, should be recognised for their cumulative impact and identification of strategic transport measures. TfL request that the Council clarify that the Strategic Transport Study will not determine the reduced employment or reduced housing capacity for the area, but will investigate how successful different transport options are in accommodating the total growth scenario in the area. TfL state that the GWC plan focuses on new pieces of infrastructure without necessarily taking advantage of existing infrastructure (e.g. Syon Lane and Brentford NR stations) and suggest that committed improvements, such as the frequency and capacity enhancements on the Hounslow Loop, as well as the changes to bus provision associated with Crossrail should be acknowledged in the draft GWC plan document to help address some of the existing challenges. TfL note the considerable focus in the document on two proposed rail links and state that the Strategic Transport Study will consider the role of both potential options in supporting growth along the GWC, as well as a range of alternative options. TfL note the vision to reduce car use whilst increasing the attractiveness of other modes, for example through a borough traffic reduction strategy (MTS proposal 20 and 21). TfL considers that document does not sufficiently address parking provision associated with developments and request that the Plan should identify and acknowledge the link between parking and car use, in particular for employment uses. TfL state that it is critical that the GWC, as a future growth area, does not perpetuate high levels of parking provision and request that policies should accord with the emerging London Plan, including promotion, where appropriate, of</p>	<p>Comments noted. Policy GWC6 has been amended in line with comments received from TfL and the findings of the Strategic Transport Study. The Council is committed to reducing car use in the area and has undertaken assessments to test the viability of car parking restrictions for businesses in the areas under a CPZ to encourage the use of more sustainable transport options. The introduction of a Workplace Parking Levy in the area has also been consulted upon. The Draft New London Plan has strict parking provision guidelines that are utilised in the borough. Suggested amendments to policy wording has been taken on board where appropriate in the draft submission version of the Plan. The provision of transport improvements, even in the event that strategic infrastructure is not deliverable, is a priority for the Council. Alternatives to 'game-changing' infrastructure are being considered and were tested in the Strategic Transport Study. Policies have been amended in line with the findings of the STS and on-going engagement with TfL. Funding for strategic transportation projects is a priority for the Council and funding mechanisms will be devised as the projects progress.</p>

GWC5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	<p>lower than London Plan maximum parking standards. TfL suggest that the introduction of CPZ to manage on street parking should be referenced in the plan document, in particular where parking provision is capped. TfL welcomes the Council's commitment to improve walking and cycling links and public transport provision set out in the draft GWC plan, however it is considered that this could be strengthened further through a number of amendments to policy wording. TfL considers the conclusion that the proposed Golden Mile Station linking the GWC to Southall Crossrail and the Lionel Road Station linking the GWC to Old Oak Common as the most important infrastructure provision for the GWC is premature. TfL consider the role of the STS is to identify a package of transport measures and future connections needed to support growth. TfL consider that the draft GWC plan should clarify that these stations are at this stage neither committed nor funded, and funding and deliverability challenges associated should be highlighted, and reiterate the importance of investigating and supporting alternative interventions within the plan to reduce the reliance on supporting growth through infrastructure projects that the Council may find challenging to deliver. TfL consider that developer contributions to help deliver some transport improvements should be highlighted in this section, in addition to a commitment to support the delivery of transport infrastructure in the plan area through CIL funding.</p>	
Be Living (Company)	<p>Be Living supports sustainable transport initiatives including improvements to public transport infrastructure, car clubs, cycle super highways and other initiatives to reduce car dependency. However, Be Living are also aware of local sensitivities and appreciate that many people choose to live in the area because of the proximity to the A4 and road network, and state that car parking provision should reflect current and projected demand considered on a site by site basis. Be Living consider that improvements to the existing transport network, such as Gunnersbury and Kew Bridge Stations, and proposed initiatives such as the Southall shuttle Crossrail Link and West London Orbital Link should be prioritised to help promote sustainable transport objectives whilst ensuring that the needs of residents and employees are met. Be</p>	<p>Comments noted. The policies contained in the draft submission version of the plan have been updated and amended to reflect the findings of the Strategic Transport Study. The Draft New London Plan has strict parking provision guidelines that are utilised in the borough. The approach to parking in the GWC area is in line with emerging London Plan policy. The provision of transport improvements, even in the event that strategic infrastructure is not deliverable, is a priority for the Council. Policies have been amended in line with the findings of the STS and on-going engagement with TfL. Funding for strategic transportation projects is a priority</p>

GWC5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	<p>Living supports the Council's aims to facilitate the delivery of the proposed Golden Mile Station and Lionel Road Station as these have the potential to unlock suppressed demand, support growth in the area and enhance a much-needed transport provision. Be Living has concerns about the level of over-reliance of these links in the plan and states that the alternative policies are not very established. Be Living consider the lack of committed funding for the game-changing schemes makes it difficult to treat them as anything other than aspirational. That said, given the significant political and commercial support within the Borough, Be Living would like to stress that the plans should be prioritised. Be Living supports proposed additional sustainable transport links to The Brentford Community Stadium development at Lionel Road South and considers this will offer a great opportunity to help ensure that growth in the area is sustainable and helps to reduce car dependency. Be Living supports the potential to safeguard land for future station development at Lionel Road Station. Be Living suggest the Council apply for access to additional government funding to promote electric vehicle use through charging infrastructure to assist in promoting greener cars and improving air quality in the Borough.</p>	<p>for the Council and funding mechanisms will be formalised as the projects progress. Policy GWC6 requires development to provide for active and passive charging facilities for EV or Ultra-Low Emission vehicles as required by the emerging London Plan.</p>
Hounslow Green Party (Non-profit organisation)	<p>The Hounslow Green Party consider that the whole development would be severely compromised if the proposed new rail links are not delivered, and state that in this scenario, points raised in relation to reducing car use become more relevant. The Hounslow Green Party support the plan to radically improve the bus service along the A4 as this is long overdue. The Hounslow Green Party state that a major local concern is the provision of adequate health and social services and nursery and school places, and claim that the local track record on this is bad.</p>	<p>Comments noted. The provision of transport improvements, even in the event that strategic infrastructure is not deliverable, is a priority for the Council. Policy GWC6 has been amended in line with the findings of the Sustainable Transport Study. Ensuring that social infrastructure grows alongside population growth is a key to sustainable growth in the borough.</p>
J. Weatherley (Individual)	<p>The respondent requests that the GWC Plan does not remove pavement space and bus lanes for the benefit of cyclists at the expense of pedestrians and bus users on Chiswick High Road, and that transport interventions do not isolate Chiswick Village any further by removing the few entry/exit routes into the area.</p>	<p>Comments noted. Comments for the Cycle Super Highway should be directed to TfL as they are the CS9 delivery body. There are no plans to restrict entry into Chiswick.</p>
The Isleworth Society (Community)	<p>The Isleworth Society consider that a comprehensive programme for</p>	<p>Comments noted. The Council is committed to</p>

GWC5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
organisation)	transport improvement to include inter alia a cycle superhighway for the A4, a total re-build of Gunnersbury Station with substantially improved access, increased local bus services and a two way link to Cross Rail is required. The Isleworth Society state that it is imperative new developments are not approved prior to PTAL improvements. The Isleworth Society state that evaluation of how much additional development can be accommodated is not possible until the Transport Impact Assessment is provided. The Isleworth Society acknowledge that the document suggests an incremental approach to achieving the necessary growth, it should be made clear that this must be related to achievable delivery dates for any new or updated transport infrastructure. Improvements must be step free and able to cope with increasing levels of demand including at weekends as a pre-requisite.	improving connectivity along the corridor and across the borough. The Strategic Transport Study provides detailed analysis and its findings have been used to ensure growth is phased alongside transport improvements. The study also provides evidence to support the strategic infrastructure needed along the corridor. The study is a key evidence document and amended policies in the draft submission version of the document have been developed in accordance with its findings, in order to ensure the transport network can serve the growing population. Station accessibility is a priority of the Council's Local Implementation Plan 2019-2041 (LIP).
St John's Residents Association (Community organisation)	The St John's Residents Association note para 2,16 which states "any significant employment growth is dependent on significant improvements to public transport to access the area" and consider that development should be dependent on significantly improved rail based access and not solely bus based improvements. The St John's Residents Association fully support plans for a shuttle to the Crossrail station at Southall and for a new station at Lionel Road, however concern is raised around we the target delivery dates as being too ambitious. The St John's Residents Association question the conclusion that people wishing to live close to their workplace would choose to live so close to major roads and note that many applications are for studio/1/2 bedroom flats rather than family accommodation. The St John's Residents Association claim that sites close to the North and South Circular Roads, the A4/M3 corridor are unsuitable for residential development. The St John's Residents Association raise concern around the poor accessibility levels of a number of sites and the reliance on principally the H91 bus route as the main public transport link. The St John's Residents Association recommend a comprehensive programme for transport improvements to include enhanced cycle provision by means of segregated routes protected by trees along the A4, a total re-build of Gunnersbury Station with substantially improved access,	"Comments noted. The Council is committed to improving connectivity along the corridor and across the borough. The Strategic Transport Study provides detailed analysis and its findings have been used to ensure growth is phased alongside transport improvements. The Council is promoting the delivery of mixed use accommodation in line with identified need. The draft submission version of the plan contains Policy GWC3 which seeks to ensure that less sensitive non-residential uses are located to provide a buffer between the areas of worst air and noise pollution, while also ensuring all developments minimise exposure to elevated levels of pollution through a range of mitigation measures. The Strategic Transport Study has informed the approach to phasing development so that it is delivered alongside transport improvements. Cycle infrastructure improvements, station improvements and increased and enhanced bus services are all included in policy GWC6.

GWC5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	increased local bus services and Crossrail shuttle. The St John's Residents Association state that it is imperative that new developments are not approved prior to PTAL improvements. The St John's Residents Association state that evaluation of how much additional development can be accommodated is not possible until the Transport Impact Assessment is provided.	
H. Mortimer (Individual)	The respondent notes that the POC recognises the need for material improvements in public transport accessibility to the GWC, however it is claimed that there are no concrete commitments to do this within the plan period. The respondent states that TfL are not able to provide funds or to progress the transport improvements envisaged in the POC. The respondent does not wish to see any necessary funds being provided by developers in exchange for permission to build extra tall and dense buildings. The respondent states that the effect of the changes proposed are likely to increase pollution and congestion and reduce accessibility. The respondent states that public transport accessibility level (PTAL) is poor in the GWC and East Brentford and recommends that no new development should be approved before the PTAL has been sufficiently improved. The respondent requests that they would like the opportunity to comment on the Transport Impact Assessment when it is available.	Comments noted. The Council is committed to improving connectivity along the corridor and across the borough. The West London Orbital link with a station at Lionel Road has been prioritised for delivery by the GLA in the latest MTS, and therefore delivery within the plan period is likely. The Southall Crossrail link is under going the third stage of feasibility study (GRIP 3) and is progressing in a timely manner. The Strategic Transport Study provides detailed analysis and its findings have been used to ensure growth is phased alongside transport improvements. This has being carried out in jointly with TfL and will be provided as an evidence base document for the Regulation 19 consultation.
P. Harding (Individual)	The respondent states that developments proposed depend on a significant improvement in public transport, and that these improvements are needed even without expansion. The respondent welcomes the proposed rail links and states that such improvements would be essential to support the number of new jobs and new homes proposed. The respondent notes that there are presently plans by South Western Railways to increase the frequency of trains on present routes serving the area, however the additional services are not intended to stop at either Isleworth or Syon Lane despite both stations being very busy at certain times of the day. The respondent recommends improved frequency of the 91 bus service along the Great West Road and suggests that local residents be consulted on possible new bus routes to provide a more comprehensive range of services in	Comments noted. The Council has carried out Strategic Transport Studies to advise development capacity and phasing in the Local Plan review of the GWC. The recent service changes made to services operated by South Western rail services are outside the purview of this plan. The Council has been working with TfL to determine the feasibility of improved transport options along the A4 and policy GWC6 sets out how the Council will work with developers, partners and stakeholders to deliver improvements and extensions to existing bus services, routes, and infrastructure, and/or provision of new bus routes and infrastructure, including improvements to frequency and duration of services,

GWC5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	the North Isleworth / Osterley area. The respondent also recommends more electronic bus timetables to encourage bus use and the introduction of bus lanes along the Great West Road. The respondent states that separate cycle lanes are to be encouraged where practical, however these should not involve cyclists sharing pavement space with pedestrians as proposed for CS9 given safety concerns	bus priority measures, improved bus stops and real time information. To our understanding the cycle superhighway will be a separate, if not segregated cycling route. Comments regarding the specific design of the cycle superhighway should be directed to TfL.
Hounslow Cycling (Charity)	Hounslow Cycling recommend the Council acquires land surplus to requirements from Gillette factory and the Homebase site to allow more space to be allocated to cycling to ease conflict between cyclist and pedestrians in what is currently a very narrow area to pass on the east side both north and south of the A4 (especially the bus stop near Homebase). Hounslow Cycling note that the traffic islands, given their small size are unsuitable for bicycles and large groups of pedestrians, and need to be enlarged. Hounslow Cycling note that the plans show a pedestrian cycle route across Chiswick roundabout and request this route be extended eastwards along Chiswick High Rd to provide a link with Chiswick Business Park, Gunnersbury station and CS9. Hounslow Cycling note that the Boston Manor Road protected cycleway was approved by councillors in January 2015. We urge the council to progress with building this important and strategic link. Hounslow Cycling welcome the proposals for a traffic free cycle link between Boston Manor Underground station and the Sky complex (The Boston Manor Boardwalk) and note that shared routes need to be wide enough to be shared comfortably. Hounslow Cycling the Lionel Road cycle route needs to be both avoid conflict with pedestrians and also be protected from motor vehicles. Hounslow Cycling note that the much degraded A4 cycleways are referred to in these plans and urge the Council and the London Assembly to discuss with TfL how they can be upgraded to a continuous standard of protection with clear unobstructed routes and conflict with buses and other vehicles removed. Hounslow Cycling welcome the emphasis on improving crossings at busy junctions and we ask for clear protected cycle routes to be installed at these junctions.	Comments noted. Policies have been written to ensure land for cycle and pedestrian requirements are taken into consideration during the renewal or reconfiguration of sites such as Homebase and the Gillette Building. Comments regarding the traffic circle have been passed on to Traffic and Transport. The map is indicative and only shows the direction of cycle and pedestrian routes, not the full extent, but connections to CS9 are a priority to improve connectivity. Works on the Boston Manor cycling route has been approved and has commenced. The Council is working with TfL to carry out improvements to the cycling facilities along the A4 and Boston Manor Road, and improve pedestrian and cycle crossings on the A4 to improve connectivity and permeability. Support for the Boston Manor Boardwalk link has been noted and comments taken on board. The Council will continue to work closely with TfL to improve cycling access in the area, with attention paid to the improvements along the A4
K. Kahler (Individual)	The respondent recommends incentives to buy electric cars in order to	Comment noted. Offering incentives for residents to buy

GWC5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	develop sustainable forms of travel to serve the Great West Corridor in the future.	electric vehicles (EV) is not within the purview of the Plan, however the Council will continue to provide EV infrastructure improvements to facilitate greater uptake of this technology by residents.
T. Henderson (Individual)	The respondent supports proposals for the Golden Mile Station and the Sky Boardwalk to Boston Manor Station, but states that greater attention should be taken to ensure that junction design allows for cyclists and pedestrians to easily travel along the A4 and cross it safely. The respondent states that Gillette Corner and Ealing Road present particular barriers and notes that recent work and proposals for cycle lanes along the A4 have been retrogressive with unsatisfactory and ambiguous increases in shared-space provision and a deterioration in provision of a safe, segregated route. The respondent recommends that TfL resolve the issues with the A4 identified in the GLA report ""Hostile Streets"", with more attention given to maintenance of the cycle tracks and road sweeping along the A4 by Hounslow Highways acting for TfL. The respondent recomemnds that linkages to CS9 should be properly incorporated and signposted.	Comments noted. The Council views improvements to cycling infrastructure as a critical aspect of encouraging healthy communities and enhancing the public realm. The Council will continue to work closely with TfL to improve cycling access and safety along the A4 in order to improve permeability and to address the hostile environment. The Plan envisages a more joined up cycle network with north/south cycle routes connecting the Corridor to CS9.
The Kew Society (Charity)	The Kew Society support the approach behind the Transport and Connectivity strategy set out in the Plan, particularly the encouragement of walking and cycling through the provision of an attractive public realm and the enhanced public transport access and infrastructure. The Kew Society recommends that the Council redouble its efforts for new developments to show reduction in traffic pollution levels in line with legal limits.	Support noted. The Council will work with key stakeholders to reduce traffic congestion and improve air quality and noise pollution in traffic hotspots such as the Chiswick roundabout, the M4/A4 corridor and on orbital connector routes such as Ealing Road
LB Hounslow Public Health (Government)	LB Hounslow Public Health requests that the Plan references health in the transport section, including that transport design should support the health of residents thorough supporting active travel, ensuring networks link to housing, schools and work places and are well signposted. LB Hounslow Public Health also state that they would prefer cycle paths to be physically separated from motor vehicles and request that policy refer to the Mayor of London's 'Healthy Streets for London' approach.	Comments noted. The Council has worked with TfL to implement the Mayor's Healthy Streets approach and this has informed the development of GWC transport policies in the draft submission version of the Plan, including improving street legibility and connectivity to community amenities.
D. O'Leary (Individual)	The respondent recommends that the Council provides a decent bus	Comments noted. Policy GW6 has been amended and

<b>GWCS Transport and Connectivity</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	service, siting issues with the H91 service, and notes that the cycling lane is dangerous and of a poor quality. The respondent notes that if pollution issues could be addressed they might be more tempted to walk or cycle, however the infrastructure results in traffic jams and poor air quality.	the Council will continue to work with stakeholders such as TfL and land owners to improve bus, pedestrian, and cycle access improvements along the A4 and surrounding area.
London Diocesan Fund (Company)	The London Diocesan Fund agrees with the Transport and Connectivity preferred policy options	Support noted.
A. Allanach (Individual)	The respondent states that the Brentford to Southall link will be absolutely critical in managing and reducing car dependency in the area - particularly through reducing traffic flows from the west into the area including commuting from outside the M25 - and as a result must be expedited as a top priority. The respondent notes that the rail link to Old Oak Common will expand the catchment of the Great West Corridor, however existing bus infrastructure does mitigate this already to a reasonable extent. The respondent agrees with the Transport and Connectivity preferred policy options.	Comments noted. The Council will continue to advocate strongly for the delivery of the Southall Crossrail Link and station, in addition to delivering bus, pedestrian, and cycle access improvements in line with the findings of the Strategic Transport Study.
E. Guerst (Individual)	The respondent recommends more rail connectivity and states that big reductions in air pollution are necessary. The respondent suggests that the Council should continue to oppose Heathrow expansion as an additional policy in relation to Transport and Connectivity.	Comments noted. The Council will continue to advocate strongly for the delivery of the Southall Crossrail Link and station, and the WLO Over ground extension with a new station at Lionel Road, in addition to delivering bus, pedestrian, and cycle access improvements in line with the findings of the Strategic Transport Study. Heathrow Expansion is outside the purview of the strategic transport and connectivity policies related to the GWC area.

<b>GWC P1 Great West Corridor West</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
G R Planning Consultancy Ltd (Company)	G R Planning Consultancy Ltd state that emerging policies do not recognise the important retail and employment role that the Homebase site performs or its importance in supporting and complementing the longstanding commercial function of the area; nor does it provide sufficient protection for this retail use or its role. G R Planning	Comments noted. The proposed allocation for the Homebase site recognises its existing retail function and proposes retention of reconfigured retail floorspace.

GWC P1 Great West Corridor West		
Respondent	Representation Summary	Council Response
	<p>Consultancy Ltd request that Employment policy be amended to refer to the retail use including up to 6,000 square metres of gross floorspace. This would allow consideration to be given to the inclusion, within any redevelopment scheme, of a replacement Homebase (Bunnings) store – similar to the approach taken in relation to the Tesco Extra allocation within Appendix 1 of the GWC. G R Planning Consultancy Ltd request part (d) to Policy 1 should include an additional provision confirming that existing businesses (including retail) will be relocated if it does not prove possible to incorporate them within any viable redevelopment scheme.</p>	
Canal and River Trust (Non-profit organisation)	<p>The Canal and River Trust (CRT) note the reference to a new ‘boardwalk’ over the Grand Union Canal (‘river’) and M4 to link to Boston Manor tube station. CRT state that more appropriate and attractive alternative routes and options should be considered to accommodate pedestrians and cyclists whilst avoiding the need for a new bridge. CRT state that any bridge should include access to the towpath and advise that the Council should be aware that bridge proposals would affect the Trust’s interests as landowner, requiring a separate agreement would be required with the Trust’s Estates team and the approval of the Secretary of State. CRT request they are consulted at the earliest stage for proposals relating to new bridges across their waterways.</p> <p>CRT note that figure 5.4 shows a “Preferred industrial Area” adjacent to the canal and suggest that any developments here must maintain the tree screening around the canal and enhance the vegetation to screen the industrial uses and maintain a pleasant green/blue corridor along the canal.</p> <p>CRT note a proposed new bridge connection over the Grand Union Canal halfway between the existing footbridge, and the Great West Road and advise that this would affect the Trust’s interests as landowner, requiring a separate agreement with the Trust’s Estates team and the approval of the Secretary of State. CRT ask to be consulted at the earliest stage for proposals relating to new bridges</p>	<p>Comments noted. The Council will continue to show support for the Boston Manor Boardwalk, and will work with the stakeholders involved to plan the most effective and safe route appropriate, particularly in areas where it is to be a shared or segregated pathway. The proposed route of the Boston Manor Boardwalk is indicative and has been proposed to give the most direct access from the Sky campus to Boston Manor tube. GWC West policy P1 proposes the establishment of continuous, high-quality walking and cycling routes throughout the area. A number of additional footbridges are being considered to increase connectivity in this part of the GWC area and the locations indicated are aspirational. The Council will consult the CRT in relation to proposals for any bridges crossing it's waterways at the earliest opportunity.</p>

<b>GWC P1 Great West Corridor West</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>across their waterways, however CRT would welcome the principle of an improved pedestrian and cycle route from the canal through Boston Manor Park to Boston Manor Road (and towards Boston Manor station), and welcome future desirable walking/cycling routes through the preferred industrial area to the canal. CRT note that this could provide a good sustainable commuting link once the towpath is improved.</p> <p>CRT note that the “River Brent Walking and Cycling Route” is identified along the towpath.</p>	
Gillette Corner Holdings Ltd (Company)	<p>Gillette Corner Holdings Ltd state that policy P1 (i) is overly restrictive in setting heights; building heights should be tested in heritage and townscape terms and not be specified in planning policy.</p> <p>Gillette Corner Holdings Ltd recommend provision of approx. 150 units as part of proposal for the mixed-use redevelopment of the Gillette building into a creative hub for smaller businesses SME’s and freelance workers in the digital, media and broadcasting industry including an element of residential in mixed-use blocks to the rear of the site.</p>	<p>Comment noted. The proposed policy is based on the evidence base and proposed height ranges have been tested and their impact assessed against strategic and local views and local heritage assets. The Gillette Factory site has been allocated for Business (B1) principally light industrial (B1c) with limited Residential and other supporting uses.</p>
Isleworth Properties & Access Self Storage (Company)	<p>Isleworth Properties &amp; Access Self Storage state that the boundary of the Local Plan review should include Site 25 'South of Gillette corner or justify why this is not included considering it is allocated for development. Isleworth Properties &amp; Access Self Storage note that to have excluded Site 25, the Council must have concluded that the land, and any major, mixed-use development delivered on it, is unrelated to development on the other side of the Great West Road, Syon Lane or the Golden Mile; that there is no need for comprehensive or co-ordinated thinking in the delivery of development on Site 25 and other sites on the other side of the Great West Road, and that development of Site 25 does not need to contribute, either financially or in physical delivery, to the improvement of public transport and accessibility to such transport.</p>	<p>Commented noted. Site south of Gillette Corner was allocated in the Local Plan 2015 for development, and was considered appropriate to maintain as a site allocation (See Local Plan Reviews - Amendments to Existing Local Plan document, page 21). Subsequent work to identify additional capacity has led to the site allocation being reviewed and allocated as Site 13 (Former Syon Gate Service Station) in the draft submission version of the Plan.</p>
West Chiswick and Gunnersbury Society (Community organisation)	<p>West Chiswick and Gunnersbury Society (WCGS) request further clarification of the relationship between supporting text and proposed</p>	<p>Comment noted. The place polices contained within the draft submission of the GWC Plan review have been</p>

<b>GWC P1 Great West Corridor West</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>policy, and note that policies should be applied consistently between all place policies (GWC West Place policy P1, GWC Central Place policy Place P2 and GWC East Place policy P3).</p> <p>WCGS broadly support the approach described in the West Place policy section, with the exception of the quantum of growth given. WCGS state, however, that it will be necessary to adopt the alternative policy option as it is claimed that it will not be possible to deliver the game-changing infrastructure projects within the time frame of the GWC Plan.</p>	<p>updated and amended to ensure a greater level of consistency across the Plan. Ensuring that infrastructure is delivered to support growth remains a key objective of the draft submission version of the Plan. The Council is committed to improving connectivity along the corridor, across the borough and to the wider region and delivery has been phased to ensure development is delivered alongside improvements in Transport infrastructure.</p>
The Isleworth Society (Community organisation)	<p>The Isleworth Society state that the GWC West place preferred policy option approach is unrealistic, siting requirements for lay-bys for buses to prevent congestion at each stop, cycle routes needing protection from traffic turning off the road and safety issues for pedestrians crossing the six lane highway. The Isleworth Society state that it is essential buildings are set back to make provision for these aspects, in addition to room for trees, signal controlled crossings, service access, etc.</p>	<p>Comments noted. The Council has worked with TfL to develop the Strategic Transport Study and to incorporate the Mayor's Healthy Streets approach in Plan policies. This has informed the development of GWC Transport and Place policies in the draft submission version of the Plan, including improving street legibility, pedestrian safety, cycle infrastructure, public realm and accessibility.</p>
Osterley & Wyke Green Residents' Association (Community organisation)	<p>Osterley &amp; Wyke Green Residents' Association (OWGRA) note proposals for the intensification of the TESCO site, and state that this will have implications for traffic - and any new school travel plans in the long term. OWGRA also note that similar developments at the Sky site will have knock-on effects in the OWGRA area. OWGRA state that this proposal has not been the subject of any public discussion and raise concern around the site allocation, if included in the GWC plan following consultation, being given general approval. OWGRA state this has not been discussed with residents and therefore has not been approved.</p> <p>OWGRA raise concern around the two new schools along Syon Lane being based on "optimistic" transport analyses and the effect of further development upon traffic congestion along Syon Lane and at Gillette Corner.</p>	<p>Comment noted. The inclusion of the proposed intensification of the Tesco Extra Site on Syon Lane in GWC Local Plan Review does not constitute 'general approval'. Any development on the site would be subject to planning permission, including consultation with residents and a Transport Impact Assessment. More generally, the Strategic Transport Study provides evidence to support the strategic infrastructure needed within the GWC area to support anticipated growth whilst addressing issues such as traffic congestion. The study is a key evidence document and amended policies in the draft submission version of the document have been developed in accordance with its findings.</p>
St John's Residents Association (Community organisation)	<p>St John's Residents Association state that the GWC West Place preferred policy option approach is unrealistic, siting concerns around</p>	<p>Comments noted. The Council has worked with TfL to develop the Strategic Transport Study and to</p>

GWC P1 Great West Corridor West		
Respondent	Representation Summary	Council Response
	<p>cycle routes requiring protection from traffic turning off the road and safety issues for pedestrian attempting to cross a six lane highway. St John's Residents Association consider that buildings should be set back to make provision for these aspects, in addition to room for trees, signal controlled crossings and service access (etc.).</p>	<p>incorporate the Mayor's Healthy Streets approach in Plan policy. This has informed the development of GWC Transport and Place policies in the draft submission version of the Plan, including improving street legibility, pedestrian safety, cycle infrastructure, public realm and accessibility.</p>
P. Harding (Individual)	<p>The respondent notes the ambitions to turn the present Gillette site into a media hub, but advises caution based on personal experience with the Wood Lane BBC media village, Shepherds Bush. The respondent further cautions that it will be difficult to attract media companies into the area from established centres, such as London West End.</p> <p>The respondent notes that Transport Avenue has an attractive canal on one side of the road, but the road suffers from environmental issues resulting from associated use by HGVs (etc.). The respondent recommends Transport Avenue is transformed with an attractive, safe and healthy public realm but such improvements are not mentioned in the Plan. The respondent notes the Council's position that the road suffers from a poor environment however little can be done due to the road serving a valuable and long standing economic need - but questions whether economic needs will override environmental protections and improvements when funding becomes an issue.</p> <p>The respondent notes the proposed intensification of use of the Tesco Osterley site to introduce 560 residential units and 1,500 sqm of work spaces but questions how this will be delivered given site constraints and high levels of use. In addition, the respondent raises concerns relating to the traffic congestion and atmospheric pollution at the Gillette junction and considers a traffic assessment in respect of the proposed 560 new dwellings would make interesting reading.</p>	<p>Comment noted. The Council undertook an Employment Land Review (2016) concluded that Hounslow has exceptional growth potential for emerging industries such as media and digital. The Gillette Factory site allocation aims to deliver flexible light industrial space with ancillary Office and supporting uses related to media and production, making the most of the building's large floorplates, attractive features and location.</p> <p>Transport Avenue is designated as a Strategic Industrial Location in the London Plan and serves an important function. No non-industrial development is envisaged for this area.</p> <p>Detailed proposals for the Tesco Osterley site are set out in the Volume 2: Site Allocations document.</p>
The Kew Society (Charity)	<p>The Kew Society state that they agree with the approach set out in the Great West Corridor West preferred policy option, subject to our other comments in this section.</p>	<p>Comment noted.</p>

GWC P1 Great West Corridor West		
Respondent	Representation Summary	Council Response
LB Hounslow Public Health (Government)	<p>LB Hounslow Public Health consider that the Plan does not include enough references to the need for forward planning to support healthy lifestyles for residents and healthy workplaces for workers. LB Hounslow Public Health recommend reference is made to the following:</p> <ol style="list-style-type: none"> <li>1. Movement and access: Clearly signposted, with direct walking and cycling networks; safe and accessible networks, and a public realm for all; Walking prioritised over motor vehicles, and vehicle speed managed; area-wide walking and cycling infrastructure provided; and use of residential and business travel plans.</li> <li>2. Open spaces, play and recreation: planned network of multi-functional green and blue spaces; easy-to-get-to natural green open spaces of different sizes; safe and easy-to-get-to play and recreational spaces for all, with passive surveillance; and sports and leisure facilities designed and maintained for everyone to use</li> <li>3. Healthy food: maintain and enhance opportunities for community food growing; avoid over-concentration of unhealthy food uses such as hot-food takeaways in town centres and in proximity to schools or other facilities aimed at children and young people; shops/food markets that sell a diverse offer of food choices and are easy to get to.</li> <li>4. Neighbourhood spaces and social infrastructure: community and healthcare facilities provided early as a part of new development; services and facilities co-located within buildings where feasible; and public spaces that are attractive, easy to get to, and designed for a variety of uses</li> <li>5. Buildings: adequate internal spaces for bike storage, dining and kitchen facilities; adequate private or semi-private outdoor space per dwelling; car parking spaces are minimised across the development; and well-designed buildings with passive surveillance</li> </ol>	<p>Comments noted. Policy GWC3: Health and Well Being has been added to cover some of these issues together with amended Policy GWC4: Open space and Green Infrastructure, Policy GWC1: Employment Growth, Policy GWC5: Design and Heritage and Policy GWC6: Connecting People and Places</p>

<b>GWC P1 Great West Corridor West</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>6. Local economy: enhance the vitality of the local centre by providing a more diverse retail and food offer; centres and places of employment that are easy to get to by public transport, and on walking and cycling networks; facilities are provided for people who are walking and cycling to local centres and high streets, such as street benches, toilets and secure bike storage</p> <p>LB Hounslow Public Health recommend that new housing, transport, heritage and open space developments should be 'dementia friendly'.</p>	
D. O'Leary (Individual)	The respondent does not agree with the approach set out in the Great West Corridor West preferred policy option, and states that it is too ambitious and to the detriment of everyone who lives in the area. The respondent recommends that more open spaces should be considered in this West Place area.	Comment noted. Policy GWC P1 has been amended to include more detail on provision of open spaces and public squares, as well as improvements to access, facilities and landscaping of within existing open spaces.
London Diocesan Fund (Company)	The London Diocesan Fund agrees with the approach set out in the Great West Corridor West preferred policy option.	Support welcomed.
A. Allanach (Individual)	The respondent agrees with the approach set out in the Great West Corridor West preferred policy option, however the respondent considers that there is currently a lack of 'community feel' for people who work in the area which hinders the opportunity for networks to form across companies. The respondent recommends designing buildings and public spaces to allow congregation outside of the offices, which could include cafes, restaurants and pubs, with the proposed retail frontage outside of the Golden Mile station as a potential place for this. The respondent also suggests adding retail uses near to Syon Lane Station, potentially on the corner closest to the Homebase site.	Support welcomed and comment noted. Amended GWC West Place policy q) supports the creation of an attractive arrival square to the south west of the proposed Golden Mile Station, with active ground floor A1 – A4 retail uses.
E. Guerst (Individual)	The respondent is supportive of plans to put the Gillette building to productive use, but is not supportive of proposals for the Tesco site. The respondent states that Syon Lane is a narrow country lane and suffers from daily congestion, especially in the mornings. The respondent expresses concern over the opening of two schools here.	Comment noted. Where it intersects the GWC area Syon Lane is a 2-3 lane B Road. The Council acknowledges that Syon Lane and surrounding roads can experience traffic congestion, and is promoting policies that will seek to address this through improving public transport provision and walking/cycling routes in the area to reduce car use in the area.

<b>GWC P2 Great West Corridor Central</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
Canal and River Trust (Non-profit organisation)	<p>Canal and River Trust (CRT) consider it important to ensure that there is legible and safe cycle access to the Brentford waterside via the Commerce Road junction as part of the proposed Cycle Superhighway 9 (CS9), with good wayfinding, to ensure a successful link between the two cycling routes. CRT confirm that they are currently discussing this with TfL.</p> <p>CRT note the proposed further bridge shown between the railway bridge and the A4 shown on Fig. 5.6 Spatial Strategy for Great West Corridor Central map and state that early involvement with the Trust for any new bridge proposals is required. Furthermore, CRT express concerns about an additional bridge introduced into this short, uninterrupted stretch between existing bridges, and would suggest that any new bridges provide a proper connection to the towpath as opposed to sailing over it as suggested by the artist's impression included.</p>	<p>Comments noted. The Council is committed to improving cycle and pedestrian accessibility and legibility, and this approach has been taken forward in Policy GWC6 Transport and Connectivity.</p> <p>The bridge shown between the A4 and the railway bridge is an aspirational proposal to improve the connectivity of the proposed new developments within the River Brent Quarter and Brentford station. The exact position has not been determined. Interaction with the waterfront is a key focus of any new development in that area, therefore a bridge spanning the River Brent would be expected to connect with the towpath. The Council will consult the CRT in relation to proposals for any bridges crossing its waterways at the earliest opportunity.</p>
Royal London Asset Management (Company)	Royal London Asset Management strongly object to criterion (g) of the draft policy which prescribes a maximum height range within the area and consider that this is inappropriate as it will undermine the ability of the area to optimise the use of land on sites such as Phoenix Trade Park.	Comments noted. Policy GWC5 and places policy P2 represent a reasonable and justified response to the evidence base and to the scale of development which has been coming forward, and seek to provide a comprehensive and co-ordinated masterplan-led response to managing development. Providing a band of acceptable heights is compliant with the draft New London Plan and allows new development to appropriately address setting and context. The heights proposed have been tested to ensure that the integrity of the existing uses are retained while maximising land use.
West Chiswick and Gunnersbury Society (Community organisation)	West Chiswick and Gunnersbury Society (WCGS) question whether promoting a cluster of car showrooms is an appropriate response to the car-dominated and hostile nature of the area and query whether this would detract from the key objective of promoting a modal shift away from the private car and toward more active modes of travel? WCGS	Comments noted. The Council would be open to encouraging creative use of flagship stores such as Brompton Bikes coming to the GWC area, however the current car showroom presence is operating well and providing valuable local employment. Policy P2 has been

GWC P2 Great West Corridor Central		
Respondent	Representation Summary	Council Response
	<p>suggest that Brompton Bikes could be persuaded to renew a presence in the borough with an “iconic” bike showroom perhaps displaying a golden Brompton for the Golden Mile.</p> <p>WCGS state that it will be necessary to adopt the Alternative Policy Option as it is clear that it will not be possible to deliver the game-changing infrastructure projects within the time frame of the GWC Plan.</p>	<p>amended to better reflect this.</p> <p>The traffic impacts and deliverability of the strategic infrastructure needed have been extensively tested in the GWC. The draft submission version of the Plan reflects the updated estimated delivery phasing of such infrastructure.</p>
Orchard Road Residents Group (Community organisation)	<p>The Orchard Road Residents Group (ORRG) state that the site directly next to 1 Orchard Road and opposite the Kings Arms Bar and Hotel is currently the pub’s car park and is essential for residents staying at the Hotel. ORRG consider that the Kings Arms Pub and Bar would not be able to operate as a hotel without this car park and state that developing the site would have a detrimental effect on the character of Orchard Road and adversely impact the historic view and sight lines when leaving/arriving at Brentford station. ORRG state that Orchard Road has remained largely unchanged since the 1850s and this has helped the road retain its special historic character.</p> <p>ORRG express concern over development proposals for the land adjacent to the railway line on the west side of Boston Manor Road as views of the building would be unavoidable along the whole length of Orchard Road. ORRG state that many pedestrians use Orchard Road due to its proximity to Brentford Station, and appreciate its unspoilt charm and unique character. ORRG state that apart from the office buildings fronting the A4, the approach from the A4 down Boston Manor Road to the historic St Paul’s conservation area of Brentford is characterised by low level development.</p> <p>ORRG note the range of building heights from 12 to 24 metres where appropriate as articulated in policy and state that any Tall Buildings will need to demonstrate compliance with adopted Local Plan Policy CC3. ORRG consider that a building anywhere near this height would dominate the sight line when travelling westwards towards the station and have a detrimental effect upon the character of the road. ORRG</p>	<p>Comments noted. Any development coming forward would be expected to mitigate any detrimental effects it may have on surrounding businesses and would have to respect local context and character. The council is not proposing tall buildings on this site, rather a low rise building that improves the arrival experience around Brentford Station, including provision of a small local shop or cafe. Building heights will be determined by design and will take into consideration the character of the area. Any development coming forward would have to conform to adopted Local Plan policy CC1 Context and Character. Mercury House is not a site allocated within the draft submission version of the GWC Local Plan and the Council cannot respond to comments raised in relation to an unrelated planning application here.</p>

GWC P2 Great West Corridor Central		
Respondent	Representation Summary	Council Response
	<p>suggest that any building on this site should be low level, be sympathetic to the surrounding Victorian houses and should enhance this pocket of Victorian streets.</p> <p>ORRG question how some of the proposed development sites would conform to the Hounslow Local Plan's Policy CC1 Context and Character criteria, which purport to 'recognise the context and varied character of the borough's places, and seek to ensure that all new development conserves and takes opportunities to enhance their special qualities and heritage'.</p> <p>ORRG express concerns around proposed development at Mercury House and consider that any new developments in or around Orchard Road should be in keeping with the historic architecture and heights of existing buildings.</p>	
N. Erdresser (Individual)	<p>The respondent expresses shock that rather than being in a conservation area Orchard Road had now become part of the area of potential development with the Great West Corridor, with the pub car park demarcated as a potential development site allocated for residential/mixed-use. The respondent states that, given the historic character of the area, they object to any development which does not fit in with local architecture. The respondent notes recent resident led improvements to the area in liaison with South Western Railway and states that they are keen to enhance the station entrance by adding more planting and green infrastructure to help mitigate the harmful effects of pollution from traffic and to improve the appearance of the area. We envisage this entrance on Station Road as a green and open space. The respondent states that the pub uses the car park for their guests and this enables the historic sight lines from Brentford station. The respondent objects to the building of flats beside Boston Manor cafe with an additional level adding to this row of single storey businesses as Boston Manor Road is already over a storey higher in elevation when seen from Orchard Road and anything greater than the existing height of building would be overwhelmingly disproportionate in</p>	<p>Comments noted. The site is allocated for redevelopment of Brentford Station to provide a station which better supports the local community, with new retail units to serve commuters and limited residential development on the site. Heights of new development must be in conformity with Great West Corridor Central Place Policy and Great West Corridor Masterplan, and will be determined by design, taking into consideration the character of the area. Besides the Brentford Station site, there is no further development planned for the Victorian streets south of the A4/M4; they are included to show the improved connectivity proposed for the area and connections to Brentford station.</p>

GWC P2 Great West Corridor Central		
Respondent	Representation Summary	Council Response
	<p>this historic low rise area.</p> <p>The respondent states that planners should work with communities in surrounding neighbourhoods to negotiate something that works for everyone, rather than focusing solely on what external developers wish. The respondent considers that Orchard Road and the surrounding Victorian roads in our neighbourhood should be removed from the area of potential development in the Great West Corridor.</p>	
G. Christian (Individual)	<p>The respondent considers that the Victorian and Edwardian Streets between the railway line and the A4 in the central area of the GWC Area should be removed as it is inappropriate for these streets of mostly two storey Victorian and Edwardian houses to belong in an Opportunity Area designated for high density mixed use buildings. The respondent states that this is an area of historic importance to Brentford and considers that it is important to preserve the character of these roads and protect them from future development. The respondent provides details of which parts of this area should be removed.</p> <p>The respondent states that the site directly next to 1 Orchard Road and opposite the Kings Arms Bar and Hotel is currently the pub's car park and is essential for residents staying at the Hotel. The respondent considers that developing this site would have a detrimental effect on the character of Orchard Road and result in negative impacts upon the historic view and sight lines when leaving/arriving at Brentford station and that this view is part of the road's special historic character.</p> <p>The respondent raises concern in relation to land adjacent to the railway line on the west side of Boston Manor Road as the plot is directly opposite Orchard Road and views of the building would be unavoidable along the whole length of Orchard Road. The respondent states that many pedestrians use Orchard Road due to its proximity to Brentford Station, and appreciate its unspoilt charm and unique character. The respondent notes that apart from the office buildings</p>	<p>Comments noted. Besides the Brentford Station site, there is no further development planned for the Victorian streets south of the A4/M4; they are included to show the improved connectivity proposed for the area and connections to Brentford station. Any development coming forward would be expected to mitigate any detrimental effects it may have on surrounding businesses and would have to respect local context and character. The council is not proposing tall buildings on this site, rather a low rise building that improves the arrival experience around Brentford Station, including provision of a small local shop or cafe. Building heights will be determined by design and will take into consideration the character of the area. Any development coming forward would have to conform to adopted Local Plan policy CC1 Context and Character. Mercury House is not a site allocated within the draft submission version of the GWC Local Plan and the Council cannot respond to comments raised in relation to an unrelated planning application here.</p>

GWC P2 Great West Corridor Central		
Respondent	Representation Summary	Council Response
	<p>fronting the A4, the approach from the A4 down Boston Manor Road in to the historic St Paul's conservation area is characterised by low level development.</p> <p>The respondent note the range of building heights from 12 to 24 metres where appropriate as articulated in policy and state that any Tall Buildings will need to demonstrate compliance with adopted Local Plan Policy CC3. ORRG consider that a building anywhere near this height would dominate the sight line when travelling westwards towards the station and have a detrimental effect upon the character of the road. ORRG suggest that any building on this site should be low level, be sympathetic to the surrounding Victorian houses and should enhance this pocket of Victorian streets.</p>	
P. Motion (Individual)	<p>The respondent states that the area around Orchard Hill Road and the surrounding Victorian and Edwardian Houses have not been sufficiently considered within the Plan. the respondent notes the need to protect designated heritage assets including the Kew Gardens World Heritage Site but considers this area is also of architectural and historical merit. The respondent notes the benefits of living in the area and the sense of community pride that exists.</p> <p>The respondent states that there is no need for a shop near Brentford station as commuters are already served by shops near their offices, by those directly opposite the pub on Boston Manor Road and on Windmill Road. The respondent states that further retail would take business from already struggling shops and notes the failure of a recent convenience shop nearby. The respondent suggest that this area should be altered into a landscaped garden and notes the pleasant approach by car along Windmill Road from the A4 or from Ealing entering into an historic area over the railway bridge.</p> <p>The respondent raises concern around two proposed Residential led mixed-use developments: 1) The site directly next to 1 Orchard Road and opposite the Kings Arms Bar and Hotel, given issues with the pubs</p>	<p>Comments noted. The Council acknowledges the high level of resident feeling in relation to these streets. Besides the Brentford Station site, there is no further development planned for the Victorian streets south of the A4/M4; they are included to show the improved connectivity proposed for the area and connections to Brentford station. Furthermore, with the level of growth predicted in the surrounding area, and the improved connectivity to Brentford station as proposed, the need for additional retail provision is expected to increase. If the site opposite the pub comes forward the Council is proposing a small mixed use development that improves the arrival experience around Brentford Station and which compliments the existing area. There are no tall buildings proposed on this site, and any development coming forward would be required to take the surrounding context and character into consideration.</p>

GWC P2 Great West Corridor Central		
Respondent	Representation Summary	Council Response
	<p>continuing operation, the detrimental effect on the character of Orchard Road and negative impact on the historic view and sight lines when leaving/arriving at Brentford station, and the road's special historic character; and 2) land adjacent to the railway line on the west side of Boston Manor Road given the impact on views along the whole length of Orchard Road, the effect on character and the historic St Paul's conservation area low level development context.</p> <p>The respondent notes that a range of building heights from 12 to 24 metres where appropriate and raises concerns that development of tall buildings on the sites identified would dominate the sight line when travelling westwards towards the station and have a detrimental effect to the character of the road. The respondent states that any proposed Tall Building will need to demonstrate compliance with adopted Local Plan Policy CC3.</p> <p>The respondent requests that the Council acts to protect the later Victorian housing along Orchard Road houses as rare examples of intact workers' cottages of historic value.</p>	
The Kew Society (Charity)	The respondent agrees with the approach set out in the Great West Corridor Central preferred policy option.	Support welcomed.
LB Hounslow Public Health (Government)	<p>LB Hounslow Public Health consider that the Plan does not include enough references to the need for forward planning to support healthy lifestyles for residents and healthy workplaces for workers. LB Hounslow Public Health recommend reference is made to the following:</p> <p>1. Movement and access: Clearly signposted, with direct walking and cycling networks; safe and accessible networks, and a public realm for all; Walking prioritised over motor vehicles, and vehicle speed managed; area-wide walking and cycling infrastructure provided; and use of residential and business travel plans.</p> <p>2. Open spaces, play and recreation: planned network of multi-</p>	<p>Comments noted. 1. GWC Central policy P2 proposes the establishment of continuous, high-quality walking and cycling routes throughout the area. 2. GWC Central policy P2 proposes a range of improvements to open space. Adopted Local Plan policy GB9 includes details play space and sports facilities. 3. Adopted Local Plan policy GB8 includes details on allotments and local food production. The new draft London Plan policy E9C proposes restrictions on fast-food outlets near schools. 4. Local Plan policy C1 and C3 includes details of social infrastructure provision. 5. Local Plan policy CC2(u) makes provisions for cycle storage. The London Plan specifies the maximum number of car parking spaces</p>

GWC P2 Great West Corridor Central		
Respondent	Representation Summary	Council Response
	<p>functional green and blue spaces; easy-to-get-to natural green open spaces of different sizes; safe and easy-to-get-to play and recreational spaces for all, with passive surveillance; and sports and leisure facilities designed and maintained for everyone to use</p> <p>3. Healthy food: maintain and enhance opportunities for community food growing; avoid over-concentration of unhealthy food uses such as hot-food takeaways in town centres and in proximity to schools or other facilities aimed at children and young people; shops/food markets that sell a diverse offer of food choices and are easy to get to.</p> <p>4. Neighbourhood spaces and social infrastructure: community and healthcare facilities provided early as a part of new development; services and facilities co-located within buildings where feasible; and public spaces that are attractive, easy to get to, and designed for a variety of uses</p> <p>5. Buildings: adequate internal spaces for bike storage, dining and kitchen facilities; adequate private or semi-private outdoor space per dwelling; car parking spaces are minimised across the development; and well-designed buildings with passive surveillance</p> <p>6. Local economy: enhance the vitality of the local centre by providing a more diverse retail and food offer; centres and places of employment that are easy to get to by public transport, and on walking and cycling networks; facilities are provided for people who are walking and cycling to local centres and high streets, such as street benches, toilets and secure bike storage</p> <p>LB Hounslow Public Health recommend that new housing, transport, heritage and open space developments should be 'dementia friendly'.</p>	<p>that developments should provide, having regard to the type of development and public transport accessibility.</p> <p>6. Proposed transport improvements are detailed in GWC6. Policies to ensure the vitality of town centres are detailed in Local Plan policies TC2, TC3 and TC4.</p>
D. O'Leary (Individual)	The respondent considers that the Victorian and Edwardian Streets between the railway line and the A4 in the central area of the GWC Area should be removed as it is inappropriate for these streets of	Comment noted. Any development coming forward in this area would be expected to mitigate any detrimental effects it may have on residential amenity and would

<b>GWC P2 Great West Corridor Central</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>mostly two storey Victorian and Edwardian houses to belong in an Opportunity Area designated for high density mixed use buildings. The respondent states that this is an area of historic importance to Brentford and considers that it is important to preserve the character of these roads and protect them from future development. The respondent provides details of which parts of this area should be removed.</p> <p>The respondent states that more open spaces are required in addition to what is currently proposed in the Great West Corridor Central preferred policy option</p>	<p>have to respect local context and character. The roads are included in order to show proposed connectivity enhancements between Brentford Station and the rest of the corridor. Policy P2 proposes the greening of streets and public spaces to enhance the environmental quality of the public realm, especially along the A4.</p>
London Diocesan Fund	London Diocesan Fund agrees with the approach set out in the Great West Corridor Central preferred policy option	Support welcomed
A. Allanach (Individual)	The respondent agrees with the approach set out in the Great West Corridor Central preferred policy option.	Support welcomed
S. Grainger (Individual)	The respondent states that the streets of Victorian and Edwardian houses do not fit in or belong in an Opportunity Area designated for high density mixed use buildings as this is an area of historic importance to Brentford. The respondent suggests a number of amendments to the GWC boundary in order to preserve the character of these roads and protect them from future developments.	Comments noted. Besides the Brentford Station site, there is no further development planned for the Victorian streets south of the A4/M4; they are included to show the improved connectivity proposed for the area and connections to Brentford station. Any development coming forward would be expected to mitigate any detrimental effects it may have on residential amenity and would have to respect local context and character.
A. Glynn (Individual)	The respondent would like to register their opposition to the proposed plans to include Orchard road and Glenhurst Road in the GWQ extension and states that any high density buildings would not be keeping with the area which is of great architectural interest. The respondent states that the parking bays are already struggling to cope with the existing density of building.	Comment noted. Besides the Brentford Station site, there is no further development planned for the Victorian streets south of the A4/M4; they are included to show the improved connectivity proposed for the area and connections to Brentford station. Any development coming forward would be expected to mitigate any detrimental effects it may have on residential amenity and would have to respect local context and character. The transport policies and proposals for the area aim to reduce the reliance upon

GWC P2 Great West Corridor Central		
Respondent	Representation Summary	Council Response
		private cars by improving public transport accessibility and providing more walking and cycling options.
M. Crofts (Individual)	<p>The respondent strongly suggests removing Orchard Road, TW8 from the GWC area, and states that this is a unique, early Victorian Road of historic importance in good condition, with a vibrant community. The respondent recommends directing development to commercial estates and brownfield land and promoting higher density high rise residential, commercial and 'hybrid' developments. The respondent offers the example of 'Chungking Mansions' in Hong Kong as an example to follow in terms of achieving higher density development within the GWC area.</p>	<p>Comment noted. Besides the Brentford Station site, there is no further development planned for the Victorian streets south of the A4/M4; they are included to show the improved connectivity proposed for the area and connections to Brentford station. Any development coming forward would be expected to mitigate any detrimental effects it may have on residential amenity and would have to respect local context and character. Higher density developments are proposed elsewhere within the area, however the plan takes a density by design approach as per the emerging London Plan and expects development to be built in line with the heights framework as articulated in policy GWC5.</p>
C. Peppiat (individual)	<p>The respondent considers that Orchard Road and the adjoining streets of mostly Victorian and Edwardian houses do not belong in an Opportunity Area designated for high density mixed use buildings, and states that in order to preserve the character of these roads and protect them from future developments these should be removed from the GWC Area.</p> <p>The respondent proposes an amendment to the GWC plan to give further consideration of the impact of any developments within the GWC Area on these adjacent Victorian and Edwardian roads and that these streets would then be given protection in line with a Conservation Area for the roads. The respondent recommends amendments to the GWC boundary to remove certain roads from the area.</p> <p>The respondent states that these or similar proposals have been tabled previously and rejected by the local community and considers that it is not appropriate to continue without taking residents views in to account and relying on out of date and inaccurate base information to</p>	<p>Comment noted. Besides the Brentford Station site, there is no further development planned for the Victorian streets south of the A4/M4; they are included to show the improved connectivity proposed for the area and connections to Brentford station. Any development coming forward would be expected to mitigate any detrimental effects it may have on residential amenity and would have to respect local context and character. Residents have been consulted extensively as part of the preparation of the GWC Local Plan review. In relation to the point raised regarding out of date evidence, it is not possible for the Council to comment on this point without knowing which Statement is being referred to.</p>

<b>GWC P2 Great West Corridor Central</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	justify proposals. The respondent notes that some statement documents on Orchard Road were dated 1988 and described the Housing stock as late Victorian when In fact it is very early Victorian.	

<b>GWC P3 Great West Corridor East</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
Kew Bridge Distribution Centre (Company)	Kew Bridge Distribution Centre state that the policy approach seeks to establish a new Local Centre around the new station, which may be appropriate and desirable so long as the phasing is programmed alongside the delivery of the new station, for deliverability reasons.	Comment noted. This approach has been taken forward in Place policies GWC P1 and P2, and policy GWC7 Delivery and Monitoring
Reef Estates (Company)	Reef Estates note that the Draft Great West Corridor Local Plan Review Policy GW3 (part k) recognises that the adjacent site to the west, Capital Interchange Way, would be appropriate for a 'focal' building and that this would increase the visibility of built from Kew and Strand on the Green and would be set away from the 'gateway' building identified as being appropriate at the Chiswick Roundabout site. Reef Estates consider that the identification of areas for focal buildings is appropriate, however this should be based on a robust evidence base and for the reasons set out in their representations on the draft Brentford East SPD this is not the case. Reef Estates state that their site, specifically the north-west corner, shares many of the same characteristics as the eastern corner of the Capital Interchange Way Site, and would appear further towards the area of any development at Chiswick roundabout. Reef Estates question why this site has not been identified as being suitable for a focal building or whether appropriate testing to inform the guidance has taken place at all.	Comments noted. Policy GWC5 and GWC P1 seek to provide a co-ordinated approach to tall building development, including the location of 'Focal buildings', as opposed to an unmanaged and ad hoc approach, as the best way to accommodate new development in this area whilst striving to protect adjacent heritage assets. The heights framework is based on detailed testing of heights and locations as detailed in the Great West Corridor masterplan and appendices which is a key evidence base document supporting the GWC Plan.
C. Dodds (Individual)	The respondent raises concerns around the inclusion of Power Rd as part of the plan which covers mainly industrial areas as Power Rd is surrounded by residential Thorney Hedge Rd, Oxford Rd North etc and green spaces. The respondent states that this is not industrial and notes that the document confirms this by stating 1-3 levels are the norm. The respondent states that high rise buildings should be clearly stated as inappropriate in this area.	Comment noted. The polices have been informed by a Masterplan and Capacity study both of which assess the surrounding context including height characteristics. Power Road was identified as having a strong lower rise character and informed by its industrial and commercial (non-residential) use. The policy has been updated to ensure clear policy guidance is provided for the Power

GWC P3 Great West Corridor East		
Respondent	Representation Summary	Council Response
		Road area.
Port of London Authority (Government)	The PLA in general support section P3 on the Great West Corridor East area, particularly point (p) which supports proposals that deliver a network of well-connected and varied open spaces, including to the River Thames. It is noted that the supporting diagram (figure 5.8) for the Spatial Strategy of the Great West Corridor East shows a proposed public realm area at the Thames Riverside adjacent to Kew Bridge and requests whether there is any more information as to the proposals at this location.	Support noted. While the River Thames is beyond the plan area, the proposals are to improve connections and access from the plan area to surrounding areas, including the Thames. The public realm along the riverside mentioned in your comments is the existing public space between the Kew Bridge development and the river. The map has been amended so that this is not shown as proposed.
Balfour Beatty Investments (Company)	<p>Balfour Beatty Investments welcome the Council's vision for the Great West Corridor East Place Policy and ambitions for a well-planned mixed use urban quarter and support for provision of high quality mixed use employment-led development.</p> <p>Balfour Beatty Investments acknowledge the importance of setting of local heritage assets including Gunnersbury Park, Kew Gardens and Strand on the Green, but state that the inclusion of height caps is overly prescriptive. Balfour Beatty Investments request that the guidance should be amended to state that heights should be assessed on a case by case basis and comprehensive visual impact assessment, based on verifiable view modelling, should accompany planning applications where potential impacts on the significance and setting of heritage assets is identified.</p>	Comment noted. The policy has been determined on a site by site basis and within a design framework, which recognizes some sites may be better suited for mid-rise tall buildings and taller focal buildings. The policy is considered to be a reasonable and justified response to the evidence base and scale of development which has been coming forward, which seeks a comprehensive masterplanned co-ordinated response to managing development, rather than a scattered approach. Providing a band of acceptable heights is compliant with the draft New London Plan and allows new development to appropriately address setting and context. The Council's background work to the Local Plan for the GWC - the Great West Corridor Masterplan - explores options for assessing proposals for tall buildings. The selected option aims to strengthen the area and its character through the creation of a comprehensive and coordinated cityscape and skyline of buildings in identified locations and with tested and identified heights. The policies are based on current and forecast housing need, but this does not preclude applicants making exceptional cases, which they will be expected to justify in all respects in order to allow the Council to consider all material considerations as it would in assessing any application.

GWC P3 Great West Corridor East		
Respondent	Representation Summary	Council Response
West Chiswick and Gunnersbury Society (Community group)	<p>West Chiswick and Gunnersbury Society (WCGS) request that their comments should be read in conjunction with comments submitted in relation to the draft Brentford East SPD. West Chiswick and Gunnersbury Society disagree strongly that this section of the GWC provides an opportunity for high-density, mixed-use development and state that the scale and very high density of the development associated with the Brentford Stadium was dictated by the need to pay for the stadium and that the scheme was presented as a unique case and must not be used as a catalyst for yet more large-scale development on neighbouring sites. West Chiswick and Gunnersbury Society recommend that this area should see modest development that seeks to mitigate the harm inflicted by the stadium scheme and which fully respects the sensitive, low-rise surroundings and heritage and seeks to redress the balance.</p> <p>WCGS request insertion of “extended” before “modern” in relation to Fountain Leisure Centre as simple re-provision of the current facilities will not be adequate to serve the significant recent and projected increased use of these facilities.</p> <p>WCGS request amendments are made to policy around tall buildings in this area around: reducing the general range of heights of between 12 to 16 metres at the lower end, between 16 to 24 metres at the higher end; reducing the heights of landmark buildings on sites designated within the East Brentford SPD (Corridor Landmark building maximum height 48 metres and Eastern Gateway Landmark building of not more than 60 metres); and around the design of landmark buildings being of an exemplary standard and in line with adopted policy CC3. WCGS state that these maximum heights are supported by the East Brentford Capacity Study and note the conclusion of the Capacity Study that only the lowest height scenario (59m) is judged as not having a significantly adverse impact on the heritage setting within the tested sensitive views.</p>	<p>Comment noted. The Stadium scheme was approved as an exceptional case however in the intervening period the GWC has been designated as an Opportunity Area. The significant increase in housing targets set out in the emerging New London Plan has also added to the need to consider further residential growth in the area. The Council recognizes that this is a challenging situation and accordingly commissioned the GWC Masterplan in order to identify ways to facilitate growth capacity without resulting in significant harmful change to the area. The plan policies represent a comprehensive masterplanned and coordinated response to managing new growth rather than taking a scattered and ad hoc approach to development in the area.</p> <p>Comment noted in relation to Fountain Leisure Centre and agreed. Policy wording has been amended to better reflect the future needs of the Centre.</p> <p>Comment noted re. building heights. The Plan has been prepared with consideration for the increased housing and employment targets set out in the Draft New London Plan on the one hand and the need to respect and preserve the area's existing character and scale, and valuable heritage assets.</p> <p>Comment noted re. Alternative Policy Option. The Council is working hard to meet housing and employment needs and to deliver important infrastructure developments such as the West London Orbital Link. As such the Council is keen to pursue the preferred policy option. Furthermore, the West London Orbital Line is one of the priorities in the Mayor's Transport Strategy (March 2018 -</p>

GWC P3 Great West Corridor East		
Respondent	Representation Summary	Council Response
	<p>WCGS state that it will be necessary to adopt the alternative policy option as it will not be possible to deliver the Overground Old Oak Common or other game changing infrastructure within the time frame of the GWC Plan. WCGS state that increasing bus services in this area is likely to be very challenging because the road network is at capacity and congestion will impact reliability.</p> <p>WCGS consider the scale and very high density of the development associated with the Brentford Stadium must not be used as a catalyst for yet more large-scale development on neighbouring sites and that further intensifying the “urban feel” introduced by the stadium scheme will undermine the special appeal of the wider area which provides respite and retreat from the urban environment.</p> <p>WCGS state that the benefits of outlooks over Gunnersbury Park for residents must not be at the expense of harm to the character and value of the park, especially around the Potomac Lake and southern boundary mature trees is one of the most important in terms of nature conservation and biodiversity which can be negatively impacted by loss of light/sun during the day and/or light pollution at night due to light spillage and glow created by residential development.</p> <p>WCGS do not support policy approach outlined in para 5.37 on principle as it is considered that the environmental constraints are such that only very limited residential development should be contemplated within the GWC. WCGS consider that the target of 2300 units in the East section is unrealistic and unacceptable.</p> <p>WCGS strongly endorse giving heights in metres for clarity and state that the general equivalence given in parentheses could be included for information at the beginning of any relevant section. WCGS state that in addition to commercial and/or residential storeys, the overall height of a building will depend on other elements such as undercrofts, podia and roof plant.</p>	<p><a href="https://www.london.gov.uk/what-we-do/transport/our-vision-transport/mayors-transport-strategy-2018">https://www.london.gov.uk/what-we-do/transport/our-vision-transport/mayors-transport-strategy-2018</a>) and it is therefore a top priority at the local and metropolitan level.</p> <p>The Council feels that the enhancements to the area that could be achieved through new development would increase the quality of the respite and retreat from the noise and pollution of the urban environment of the area that could be provided, for instance the creation of new squares that are shielded from the M4/A4 by built form.</p> <p>The location and heights of tall buildings including any as seen from Gunnersbury Park have been identified through careful consideration and analysis of the impact of taller developments on adjacent heritage assets. The Council also strives to establish, through the Local Plan Review, a clear and legible cityscape for the area which is, in part, the result of testing of heights and locations for this building type. Furthermore, policy GWC4 aims to protecting and enhance Sites of Importance for Nature Conservation and to improve the ecology of the area by ensuring an overall net gain in biodiversity through the delivery of new biodiversity habitats throughout the corridor and in surrounding areas. All major schemes will be expected to address impacts upon ecology and biodiversity at application stage and provide an Environmental Statement and or Nature Conservation and Ecological Statement if relevant.</p> <p>Comment noted re heights. A general explanation of heights and floor heights has been included in the Plan.</p>

GWC P3 Great West Corridor East		
Respondent	Representation Summary	Council Response
Be Living (Company)	<p>Be Living support the spirit of the Great West Corridor East Place Policy (P3) in providing an opportunity for high density, mixed-use development located around the proposed new Overground railway station at Lionel Road and consider the Brentford Community Stadium development will be at the centre of the Great West Corridor East area helping to achieve numerous policy aims of the GWC plan.</p> <p>Be Living consider that whilst the Brentford Community Stadium development scheme is the subject of an existing and implemented planning permission (Ref: 00703/A/P11 and the current application to revise the proposals (Ref: 00703/A/P17)) the continued support of the proposals should be included under 'Optimising Housing and Economic Growth', since it plays a critical role in the regeneration of the area. Furthermore, Be Living state that the opportunities that the high quality design of the Brentford Community Stadium development buildings will provide (including highlighting the approved landmark buildings), as well as public realm and connectivity and permeability improvements, should be reiterated within the East Place policy.</p>	<p>Comment noted. The Brentford Community Stadium scheme has already been approved and in construction and the Council sees no purpose in singling out approved schemes in policy in order to promote future growth. Policy P3 has been amended to better reflect the Council's position on walking and cycling and public realm improvements in this area.</p>
LaSalle Investment Management (Company)	<p>LaSalle Investment Management are supportive of the Council's vision for Great West Corridor East ('Brentford East') to become a new comprehensively well planned mixed-use quarter given the proposed new Lionel Road station will significantly benefit and maximise the area's regeneration and economic and housing growth opportunity. LaSalle Investment Management are, in principle, supportive of mixed-use employment-led development on the basis that the site will provide at least the existing Class B1a office floorspace as part of any mixed use development and also deliver housing development to ensure viability as well as meeting the strategic objective of the area.</p> <p>LaSalle Investment Management raise a number of concerns in relation to the approach set out in this section and Figure 5.8 (Spatial Strategy for Great West Corridor East) which it is claimed will undermine the development potential of the site and thereby the Plan's strategic objectives.</p>	<p>Comment noted. The Council has revised the masterplan to look at these issues and has now taken forward a set of proposals set out in the Council Revised Great West Corridor Masterplan and polices GWC5 Design and Heritage and GWC East-P3</p> <p>The plan supports part of this this site being safeguarded for new station and also providing mix use office, residential and retail. The Council's viability study considers this type of mix-use development to be viable.</p> <p>The Council consider that to ensure development in the GWC OA deals with the pollution issues and is Air Quality positive, we need to ensure site and building design minimises exposure to elevated levels of air and noise pollution by the provision of noise and vibration</p>

GWC P3 Great West Corridor East		
Respondent	Representation Summary	Council Response
	<p>LaSalle Investment Management are supportive of the Plan seeking employment-led mixed use development through the redevelopment of “Lionel Road Station Quarter” but consider Class B1 light industrial type workspace will not secure a viable development on a site which currently provides Grade A office floorspace, and that there is a significant additional demand for Class B1a office floorspace as identified in the ELR 2016. LaSalle Investment Management request reference to B1 workspaces should be amended to B1 office and/or workspaces and that the GWC Plan and the 27 and 1053 Great West Road allocations be amended to incorporate further amenities and facilities on site in order to improve development viability.</p> <p>LaSalle Investment Management consider the building heights criteria and the evidence base documents which support this are not credible or reliable and it is unclear how and whether various building heights exceeding the existing heights (such as at 27 Great West Road) have been tested. LaSalle Investment Management state that the proposed general heights for 27 Great West Road would be inconsistent with the strategic vision and objective for this area which is to secure economic and housing growth, the inability to maximise the potential site’s capacity and achieve in an attractive urban landscape, in the context of the elevated M4, the heights of surrounding buildings and the consented taller developments to the south of 27 Great West Road. LaSalle Investment Management request that the minimum height of the buildings at 27 Great West Road should be higher than 40m with landmark buildings being significantly taller than stipulated in the Plan and the evidence base for the building heights should be reviewed, taking into account the height of the existing building at 27 Great West Road is 40m.</p> <p>LaSalle Investment Management raise concerns with the Council’s evidence base on tall buildings/building heights around: the scope of the view analysis or whether this has tested massing and heights for 27</p>	<p>insulation; locating sensitive uses away from existing or planned sources of air and noise pollution, including through the siting of less sensitive non-residential uses adjacent to the A4 and M4 to act as a physical “buffer” between the roads and more sensitive uses to the rear; the provision of winter gardens and balconies; and the use of greenery to act as a “buffer” along the A4/M4 corridor and other streets.</p>

GWC P3 Great West Corridor East		
Respondent	Representation Summary	Council Response
	<p>Great West Road in all the scenarios tested and presented in the Capacity Study; the various building height scenarios tested in the Capacity Study, including whether the tall building maximum threshold in this location (59m - Eastern Gateway), with remaining sites in the Brentford East area being below this threshold, considers other factors relevant in the consideration for suitable and justifiable building heights for each site, including baseline, immediate surroundings, the urban landscape/streetscene and view from the elevated motorway and development viability; the maximum height articulated in the Capacity Study for tall buildings in Brentford East (with the exception of the Eastern Gateway building) to 48m not being fully justified or explained, especially in relation to the heights of the approved Brentford Community Stadium development which are around the same or exceed the Eastern Gateway height threshold, or whether heights above 48m have been tested; and the maximum height of buildings within 27 Great West Road threshold being set at 24m (except for proposed Corridor Landmark at the maximum height of 48m) which is 40% lower than the existing building height at 40m and lower than 50% of the consented towers at the Brentford Stadium, and the adverse impacts of the approach taken upon the urban landscape, built form and massing, views and scheme viability.</p> <p>LaSalle Investment Management note that a new local centre and a public square are proposed on the 27 Great West Road allocation but note that the delivery of such, as a piece of strategic infrastructure, must be considered in the context of its impact on the site's development viability and deliverability. LaSalle Investment Management request that a number of options for the location and extent of a public space/public open space should be explored in more detail, taking into account the detailed design of the proposed station and associated third party land take up and other infrastructure requirements.</p> <p>LaSalle Investment Management are supportive of the proposed Lionel</p>	

GWC P3 Great West Corridor East		
Respondent	Representation Summary	Council Response
	<p>Road Station adjacent to 27 Great West Road, however concern is raised around delivery as this could impact on development viability. LaSalle Investment Management note policy resists development in “safeguarded land” and expresses that they wish to work positively and collaboratively with the Council so that the proposed station can be realised without undermining development viability as it is unreasonable and unjustified to safeguard land for which detail and extent has not yet been identified.</p> <p>LaSalle Investment Management consider that the proposed streets, and new walking and cycling routes would unnecessarily limit the development potential of the site, in particular, whether the new walking and cycling route which would cut through 27 and 1053 Great West Road is necessary to improve the connectivity and accessibility. LaSalle Investment Management strongly object to the proposed foot/cycle bridge being articulated as a policy requirement, as an additional strategic infrastructure requirements linked to our client’s site which could seriously undermine the deliverability of the allocated site.</p> <p>LaSalle Investment Management do not share the view that requires non-residential development to be located along the A4/the M4 to create a buffer for residential development as the only solution for addressing noise and air pollution impacts in the context of the site location, and state that the Plan should not be prescriptive about development management matters which can adequately addressed by detailed design. La Salle Investment Management consider the Plan’s approach does not meet the need to maximise the site’s development potential or to create further commercially viable office accommodation with an attractive environment which can complete with other office locations and request that the prescriptive position of buildings should be omitted or this be be amended.</p> <p>LaSalle Investment Management state that the green buffer zone</p>	

<b>GWC P3 Great West Corridor East</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	between the Great West Road and the footway is not described in adequate detail and request that further information is prepared for this aspiration.	
Reef Estates (Company)	<p>Reef Estates raise concern around the minimum quantum of new development floorspace identified in part a. (i), (ii) and (iii) of Policy P3 Great West Corridor East given questions around the robustness of the Capacity Study (2017) that supports the draft Brentford SPD, and whether these would be optimising the potential of sites within an Opportunity Area.</p> <p>Reef Estates raise concern around the Policy height thresholds, based upon the townscape methodology in the Capacity Study (2017) and the Appendix A View Analysis (2016), as it is considered that both are flawed and do not provide an appropriate basis to inform guidance.</p> <p>Reef Estates state that the methodology used to support this policy text is based on an unverified viewpoint assessment, reliant on crude 3d models of hypothetical developments and leads to the creation of arbitrary and unjustified threshold heights. Reef Estates state that the height thresholds should be removed.</p>	<p>Comment Noted. The location and heights of mid-rise and focal buildings have been identified through careful consideration and analysis of the impact of taller developments upon adjacent heritage assets. The Council has also strived to establish a clear and legible cityscape for the area through Local Plan Review policy which is, in part, the result of testing of heights and locations for these building types. The Council has opted for a coordinated, framework led approach to the location and heights of tall buildings in the area, with policy determined on a site by site basis and within a design framework, which recognizes some sites may be better suited for taller buildings. The policy is considered to be a reasonable and justified response to the findings of the evidence base and to the scale of development which has been coming forward, and represents comprehensive masterplanned co-ordinated response to managing development rather a scattered approach. Providing a band of acceptable heights is compliant with the draft New London Plan and allows new development to appropriately address its setting and context. The polices do not preclude applicants making exceptional cases at application stage, which they will be expected to justify in all respects to allow the Council to consider all material considerations as it would in assessing any planning application.</p>
J. Weatherley (Individual)	The respondent requests that the Council does not grant planning permission for flats immediately adjacent to the M4, which need sealed windows and active air extraction because the air is so polluted, and which are built on car parking space promised to be kept in perpetuity from a previous planning review, such as the northern car park in	Comment noted. The Council agrees that residential uses would not be appropriate directly facing on to strategic roads because of noise and air pollution impacts. The Council is currently receiving applications proposing residential uses in these locations and the

GWC P3 Great West Corridor East		
Respondent	Representation Summary	Council Response
	Chiswick Village.	area is under pressure to provide more housing. In the absence of any specific policies to address the specific environmental issues relating to residential development in the GWC area it is difficult for the Council to properly safeguard the amenity of future residents or ensure adequate living conditions are provided for. Given the sensitivity of these sites, the GWC plan policies clearly set out appropriate mitigation measures including siting protective non-residential uses to buffer residential uses, site location and massing, wintergardens, ventilation and green infrastructure. Policy GWC3 and P3 already cover this but policy wording has been amended to clarify this position.
Paradigm Land Ltd (Company)	<p>Paradigm Land Ltd (Paradigm) supports the vision for the GWC East place and strongly supports the approach of the GWC East Place Policy to deliver a high density, mixed use place.</p> <p>Paradigm does not consider that the area’s development should be led by employment uses, but that the policy should give greater weight to the delivery of homes in the area, and request that policy should be amended to state that the area’s redevelopment will be “residential-led”.</p> <p>Paradigm note the requirement for the delivery of affordable workspaces, but consider that policy should state that the inclusion of affordable workspace should be considered on a site by site basis according to the circumstances of each project, including financial viability.</p> <p>Paradigm note the emphasis placed on a design-led approach in Place Policy, consistent with Policy GWC3 and other policy documents, however, Paradigm considers that references to maximum building heights for development in the area should be removed.</p>	<p>Comment noted. The Council recognizes the need for the delivery of homes in the area and for this reason the policy identifies the acceptability of mixed use. However, the area still remains a Locally Significant Industrial Site and Key Existing Office Location. Similarly the policy has been determined on a site by site basis and within a design framework, which recognizes some sites may be better suited for taller buildings. The policy is considered to be a reasonable and justified response to the evidence base and scale of development which has been coming forward, which seeks a comprehensive masterplanned co-ordinated response to managing development, including uses.</p> <p>Providing a band of acceptable heights is compliant with the draft New London Plan and allows new development to appropriately address its setting and context. The Council's background work to the Local Plan for the GWC (revised Great West Corridor Masterplan explores two options for assessing proposals for tall buildings. The selected option aims to strengthen the area and its</p>

GWC P3 Great West Corridor East		
Respondent	Representation Summary	Council Response
	<p>Paradigm note the approach to requiring non-sensitive employment buildings to be placed along the frontages to the Great West Road to provide a buffer for other more sensitive uses such as residential set behind. Paradigm agrees that the frontage buildings should be for commercial uses, however it is considered that residential buildings can be positioned above the commercial uses if satisfactory mitigation is provided and that policy should be amended to reflect this.</p> <p>Paradigm note that the spatial strategy for GWC East Place, with sites to the north of the M4 proposed for office use on the frontage to the GWR, with “office-led mixed use with residential” to the rear. Paradigm considers that this indicative spatial strategy should be amended to show residential-led development on these sites as this amendment would reflect the approved PD scheme on the Parkview site, and the suitability of the sites to provide predominantly residential uses.</p>	<p>character through the creation of a comprehensive and coordinated cityscape and skyline of tall buildings in identified locations and of tested and identified heights. The polices are based on current and forecast housing need, but this does not preclude applicants making exceptional cases, which they will be expected to justify in all respects and to allow the Council to consider all material considerations as it would in assessing any application.</p> <p>The Council feels that residential uses would not be appropriate on strategic roads because of noise and air pollution. Conversely, the Council is currently handling applications that come forward that promote residential uses in these locations and that the area is under pressure to provide more housing. Given the sensitivity of these sites, the appropriate mitigation measures that could be applied including wintergardens, ventilation and even the height at which residential uses be located - and these measures would need to be negotiated with planning officers and the Council's relevant Environmental Quality officer at the time of pre-application discussions. Policy GWC3 and P3 have been amended to clarify this position.</p>
The Kew Society (Community organisation)	<p>The Kew Society agree with the approach set out in the Great West Corridor East preferred policy option subject to the requirement that “development in this area will need to have due regard to their impact on the local heritage and its setting. The most significant vistas run through the area from the Royal Botanic Gardens at Kew” (Clause 5.29 page 92), and that “building heights [that] respond to the area’s sensitive heritage locations and important views” (Clause (f), page 95). The Kew Society also refers to their separate, earlier objections to the proposed new Brentford Stadium development as a requirement to be considered.</p>	<p>Comment noted, the location and heights of tall buildings have been identified through careful consideration and analysis of the impact of taller developments on adjacent heritage assets and strategic and local views. The Council also strives to establish a clear and legible cityscape for the area which is, in part, the result of testing of heights and locations for this building type through the GWC Local Plan Review.</p>

GWC P3 Great West Corridor East		
Respondent	Representation Summary	Council Response
LB Hounslow Public Health (Government)	<p>LB Hounslow Public Health consider that the Plan does not include enough references to the need for forward planning to support healthy lifestyles for residents and healthy workplaces for workers. LB Hounslow Public Health recommend reference is made to the following:</p> <ol style="list-style-type: none"> <li>1. Movement and access: Clearly signposted, with direct walking and cycling networks; safe and accessible networks, and a public realm for all; Walking prioritised over motor vehicles, and vehicle speed managed; area-wide walking and cycling infrastructure provided; and use of residential and business travel plans.</li> <li>2. Open spaces, play and recreation: planned network of multi-functional green and blue spaces; easy-to-get-to natural green open spaces of different sizes; safe and easy-to-get-to play and recreational spaces for all, with passive surveillance; and sports and leisure facilities designed and maintained for everyone to use</li> <li>3. Healthy food: maintain and enhance opportunities for community food growing; avoid over-concentration of unhealthy food uses such as hot-food takeaways in town centres and in proximity to schools or other facilities aimed at children and young people; shops/food markets that sell a diverse offer of food choices and are easy to get to.</li> <li>4. Neighbourhood spaces and social infrastructure: community and healthcare facilities provided early as a part of new development; services and facilities co-located within buildings where feasible; and public spaces that are attractive, easy to get to, and designed for a variety of uses</li> <li>5. Buildings: adequate internal spaces for bike storage, dining and kitchen facilities; adequate private or semi-private outdoor space per dwelling; car parking spaces are minimised across the development; and well-designed buildings with passive surveillance</li> </ol>	<p>Comments noted. 1. GWC East policy P3 proposes the establishment of continuous, high-quality walking and cycling routes throughout the area. 2. GWC East policy P3 proposes a range of improvements to open space. Adopted Local Plan policy GB9 includes details play space and sports facilities. 3. Adopted Local Plan policy GB8 includes details on allotments and local food production. The new draft London Plan policy E9C proposes restrictions on fast-food outlets near schools. 4. Local Plan policy C1 and C3 includes details of social infrastructure provision. 5. Local Plan policy CC2(u) makes provisions for cycle storage. The London Plan specifies the maximum number of car parking spaces that developments should provide, having regard to the type of development and public transport accessibility. GWC policy P3 requires development in this area to be close to car-free in order to promote active and sustainable travel 6. Proposed transport improvements are detailed in GWC6. Policies to ensure the vitality of town centres are detailed in Local Plan policies TC2, TC3 and TC4.</p>

<b>GWC P3 Great West Corridor East</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>6. Local economy: enhance the vitality of the local centre by providing a more diverse retail and food offer; centres and places of employment that are easy to get to by public transport, and on walking and cycling networks; facilities are provided for people who are walking and cycling to local centres and high streets, such as street benches, toilets and secure bike storage</p> <p>LB Hounslow Public Health recommend that new housing, transport, heritage and open space developments should be 'dementia friendly'.</p>	
D. O'Leary (Individual)	The respondent does not agree with the approach set out in the Great West Corridor East preferred policy option as they consider that no high rise buildings should be allowed.	Comment noted, the location and heights of mid-rise tall buildings and focal buildings have been identified through careful consideration and analysis of the impact of taller building development on adjacent heritage assets and strategic and local views. The Council also strives to establish, through the Local Plan Review, a clear and legible cityscape for the area which is, in part, the result of testing of heights and locations for this building type. More detail is set out in the GWC Masterplan evidence
London Diocesan Fund (Company)	The respondent agrees with the approach set out in the Great West Corridor East preferred policy option.	Support welcomed
A. Allanach (Individual)	The respondent agrees with the approach set out in the Great West Corridor East preferred policy option.	Support welcomed

<b>GWC IIA, Supporting Documents and Misc.</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
C. Dodds (Individual)	The respondent is supportive of optimising housing development however notes that there is little mention of improved numbers of schools, NHS services etc. Alongside current plans already agreed or in planning there is already significant strain in the Hounslow borough on hospitals, maternity units, school places etc. Any loss of Brentford leisure centre must include the same facilities i.e. Pool, courts etc., and	Comments Noted. The Infrastructure Delivery Plan (IDP) 2019 sets out the current and future infrastructure needs to support development and policy GWC7 sets out how the Plan will ensure that the required physical and social infrastructure will be provided in a planned approach as development proposals come forward.

<b>GWC IIA, Supporting Documents and Misc.</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	similarly have accessible entry fees and rates rather than become a private gym.	
Canal and Rivers Trust (Non-profit organisation)	<p>The Canal and Rivers Trust (CRT) note that the 'Places Policies' chapter makes no reference to the Grand Union Canal, only the River Brent, and request that the Grand Union Canal is described as such, or 'Grand Union Canal/River Brent' as described in the rest of the Local Plan documents, in order to differentiate it from the non-canal parts of the River Brent, which the Trust does not own or manage, and does not have the same public access.</p> <p>CRT requests that there be a section in the Local Plan encouraging developers to seek pre-application advice from the Canal &amp; River Trust and to consult their Code of Practice for practical advice. CRT also request that the Council refer to the Town and Country Planning Association's Policy Advice note: Inland Waterways (2009) which is still relevant to waterside development and the Trust's aims - in particular, see Appendix 1 – 'Water proofing of planning policy'. CRT state that they hope to work closely with LB Hounslow as the new Local Plan progresses toward adoption.</p>	Comments noted. Policy has been amended to clarify the name of the Canal. LB Hounslow will continue to work with CRT on matters relating to the Grand Union Canal/River Brent and will ensure proper consultation takes place when determining applications and providing pre-application advice.
Brentford Community Council (Community organisation)	Brentford Community Council (BCC) raise a number of issues relating to the demarcation of boundaries within the Plan including: the Spatial Strategy indicates that the whole of the corridor would be designated for Employment without specifying a precise boundary; Local Plan (LP) page 10 Policy SV! [sic] shows no boundary; it is stated that no explanation has been given as to why the present proposals should occupy the part of the Study Area as defined by Urban Initiatives; BCC are pleased to note that the boundary of the study area shown on Fig 4.1 on page 38 excludes all the residential streets north of the A4 but state that it was assume the boundary would follow the same line; BCC are concerned that the boundary area shown on Fig 4.1 does include similar residential streets south of the A4 and north of the railway line and states that these streets have been the subject of Character Area	Comments noted. Clarification has been made to the maps to ensure that designations and proposals are clear. The residential streets south of the A4/M4 and north of the railway referred to are included to show the improved connectivity proposed for the area and the improved connections to Brentford station, hence their inclusion here. It should be noted that besides the Brentford Station site itself, these streets are not allocated for further development within the plan.

GWC IIA, Supporting Documents and Misc.		
Respondent	Representation Summary	Council Response
	<p>studies and are candidates for Conservation Area status, being contemporary with and similar in scale and character to the terraces included in the St Pauls CA; and the BCC request that the boundary for the central section of the Local Plan Review be drawn one block south of the A4 to exclude these residential areas.</p>	
<p>West Chiswick and Gunnersbury Society (Community group)</p>	<p>The West Chiswick and Gunnersbury Society (WCGS) note typographical and editorial errors in the Delivery and Monitoring Section.</p> <p>WCGS states that the provided explanation of the eventual composition of the Local Plan once the two partial reviews are completed is helpful, however it is recommended that, when Volumes 3 and 4 are incorporated, a statement is provided within a revised introduction to the Local Plan to clarify that development in the areas covered by either Volume 3 or 4 is still subject to the over-arching policies in Volume 1 and that Volumes 3 and 4 provide supplementary policies appropriate to the specific area.</p> <p>WCGS states that para 2.0 for “Power Road” read "Chiswick Roundabout” as Power Road falls outside the core Great West Corridor. It is further stated that as a peripheral area it is not considered suitable for the type of transformation/ scale of development envisaged for the main corridor.</p> <p>WCGS agrees that there are many serious challenges to development in the GWC.</p> <p>WCGS recommends amending the plan and adding further clarification on the relationship between the Local Plan 2015 and the Local Plan Reviews (GWC Plan), ensuring consistency across the Place Policies (GWC P1, P2 and P3) and correcting typographical and editorial errors identified.</p> <p>WCGS state that the cumulative amount of recently built and consented development in and around the Brentford East area is very significant</p>	<p>Comments noted. The draft submission version of the plan has been amended to ensure consistency of approach across the three Place area policies, and clarification added in relation to the relationship between this and adopted Local Plan 2015 policies. Power Road is protected as an employment area in line with existing Local Plan Policy. The Infrastructure Delivery Plan (IDP) 2019 sets out the current and future infrastructure needs to support development and policy GWC7 sets out how the Plan will ensure that the required physical and social infrastructure will be provided in a planned approach as development proposals come forward.</p>

GWC IIA, Supporting Documents and Misc.		
Respondent	Representation Summary	Council Response
	<p>and has taken place without any real infrastructure improvements, resulting in an existing negative impact on the quality of life of those living and/or working in the area. WCGS state that the completion of the consented schemes will worsen this impact. WCGS do not support early development and request that the Council desist from yielding to the temptation to 'put the cart before the horse'; WCGS state that any further major development in this area will be unsustainable unless and until the necessary infrastructure has been delivered. WCGS note that adopted Local Plan (2015) policy IMP3 (h) states “ensuring that development does not proceed unless the delivery of critical and necessary infrastructure to support that development is assured” and request that similar commitment is required in the GWC Plan in order to deliver sustainable development, “vibrant and healthy communities”, and to safeguard these attributes of the established communities in the surrounding area and their ability to enjoy the “natural, built and historic environment”.</p>	
Brentford Gate Action Group (Community group)	<p>Brentford Gate Action Group wishes to see the Brentford Gate Bridge Project Promoted through the Plan, noting that section GWC5 on Transport and Connectivity advocates various schemes to promote sustainable connectivity, actively encourage walking and cycling, improve the cycling infrastructure, link the Great West Corridor and surrounding neighbourhoods such as Brentford Town Centre and to reduce vehicle congestion in traffic hotspots. Brentford Gate Action Group states that the Brentford Gate Bridge Project would meet all these considerations.</p>	<p>Comment noted. There is currently no feasibility evidence to suggest that this project will come forward during the plan period, however the Council will look again at the status of this project during a future review of the Local Plan.</p>
D. O'Leary (Individual)	<p>The respondent states that the streets of mostly two storey Victorian and Edwardian houses do not fit in or belong in an Opportunity Area designated for high density mixed use buildings given their historic importance to Brentford. The respondent states that in order to preserve the character of these roads and protect them from future developments these should be removed from the GWC Area. The respondent requests that an amendment is made to the GWC plan to give further consideration of the impact of any developments within the GWC Area on these adjacent Victorian and Edwardian roads in line with</p>	<p>Comment noted. When designating an Opportunity Area in the London Plan the GLA look at potential sites to accommodate growth as set out in their Strategic Land Availability Assessment (SHLAA). The boundary was drawn and amended using this key evidence along with extensive engagement from public and members. The residential streets south of the A4/M4 and north of the railway referred to are included to show the improved connectivity proposed for the area and the improved</p>

<b>GWC IIA, Supporting Documents and Misc.</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	a Conservation Area, while being outside the GWC Area. The respondent provides specific details of the proposed area to be removed from GWC Area.	connections to Brentford station. It should be noted that besides the Brentford Station site itself, these streets are not allocated for further development within the plan.
J. Harrison (Individual)	The respondent requests that Church Walk should be removed from GWC area in order to preserve this small enclave of Brentford's history.	There are no development proposals for the houses along Church Walk. This is included to show the improved connectivity proposed for the area and connections to the station.
Friends of the Earth - Hounslow and Brentford (Community organisation)	Friends of the Earth - Hounslow and Brentford raise concern around the likelihood of people moving to housing in unfit buildings converted through permitted development change of use and states that the Article 4 direction to prevent this should have been in place sooner. Friends of the Earth encourage the council to take firm action in advancing its case.	Comment noted.
H. Mortimer (individual)	The respondent considers that the GWC area should be defined as the sites directly adjacent to the A4, Brentford East and the Sky Estate and that the area should not include other parts of Brentford.	Comment noted. When designating an Opportunity Area in the London Plan the GLA look at potential sites to accommodate growth as set out in their Strategic Land Availability Assessment (SHLAA). The boundary was drawn and amended using this key evidence along with extensive engagement from public and members.
P. Harding (Individual)	<p>The respondent expresses concern over a London-wide issue around areas of London, including the Borough of Hounslow, and states that these areas are expanding at a rate that is counterproductive and are becoming too overcrowded, undermining the quality of life for residents. The respondent notes the pressure on local infrastructure and facilities and the increasing problems of traffic congestion and consequential air quality issues, and suggests that the answer is to look for expansion away from the London area including building new towns and genuinely investing in the so-called Northern Powerhouse.</p> <p>The respondent notes the worthy plans set out in the Local Plan Review worthy plans but questions how these objectives are best achieved. The respondent notes Hounslow Council's official position on Heathrow Expansion with the slogan "A better not bigger Heathrow" and suggests the same sort of criteria should apply to the future development of the</p>	Comment noted. The Council must meet the needs for housing as required by the London Plan and these targets are arrived at using evidence (see GLA Strategic Housing Market Assessment, or SHMA, 2017 and GLA Strategic Housing Land Availability Assessment, or SHLAA, 2017). Policy S6 'Public Toilets' of the draft New London Plan sets out requirements for public toilets to be provided in large-scale commercial developments, as well as changing spaces in some schemes. If adopted, this policy will form part of the development plan and thus be applicable when determining planning applications for relevant major schemes in the GWC area. Support noted and we are glad you found the workshops informative.

GWC IIA, Supporting Documents and Misc.		
Respondent	Representation Summary	Council Response
	<p>Borough - i.e. "Not to expand, but to consolidate and improve what we have".</p> <p>The respondent states that the provision of public toilet facilities is often overlooked and notes that there is no explicit mention of good quality, well maintained, free-to-use and fully accessible public toilets in the GWC Local Plan Review. The respondent suggests that this provision is an absolute necessity if there is a genuine intention to encourage people to visit the area and benefit from all the new benefits and attractions that are promised in the enhanced public realm as the lack of these facilities inhibits individuals from venturing into certain areas of the Borough. The respondent notes that the London Mayor, Sadiq Khan, will, for the first time, "give detailed policy guidance on new free-to-use public lavatories in commercial developments" and requests following this approach in the WGC Plan.</p> <p>The respondent states that they attended some of consultation workshop events and expresses gratitude toward the staff at these events for the help provided and information given. The respondent states that the events provided a useful forum for gathering information, discussing issues and expressing views.</p>	
Natural England (Government)	<p>Natural England have reviewed the Great West Corridor Plan and Integrated Impact Assessment and consider that, whilst the place policies make provisions variously for 'pocket parks', 'greening' and 'buffer zones', the policies would benefit from an additional unifying measure to ensure that development in the West, Central and East sub-areas conserve biodiversity and result in a net gain in biodiversity wherever possible, so as to be in conformity with Paragraph 109 of the NPPF.</p>	<p>Comments Noted. The IIA has been updated and this will support the draft submission version of the GWC Local Plan review. Furthermore, policy GWC4 has been amended to reflect a more comprehensive approach to open space and green infrastructure provision to support the conservation of biodiversity. The amended policy aims to ensure an overall net gain in biodiversity through the delivery of new habitats throughout the corridor and in surrounding areas such as Boston Manor Park, Gunnersbury Park, the area along the Grand Union Canal/ River Brent and a linear area along Hounslow Loop's rail sidings.</p>
Osterley & Wyke Green Residents'	Osterley & Wyke Green Residents' Association (OWGRA) agree entirely	Comment noted. We have passed this comment on to

<b>GWC IIA, Supporting Documents and Misc.</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
Association (Community organisation)	<p>with the BCC response in relation to Schools Planning, however would wish to go further by recommending a further point: that the sites chosen for new schools must be at appropriate locations for the needs of the area and of a sufficient size and quality that there can be no reasonable case for a school developer to choose another site, especially one on MOL, on the basis that it is the only one possible for the intended school, and that having done this, the Council planners should direct developers of any proposed school to the sites it has set aside in advance. OWGRA cite previous planning applications for schools on Metropolitan Open Land (MOL) in the area (Nishkam and Bolder) which, its states, were justified by saying that the schools could be built nowhere else and that, combined with the need for school places, this constituted the "very special circumstances" needed to override the seemingly strong protection given to MOL.</p> <p>OWGRA state that there is no evidence from pre-planning discussions about the two schools in question that planners tried to direct the schools to an educational site already allocated by the Council, as is their right and, OWGRA suggest, their duty. OWGRA state that the Council had not allocated sites of sufficient quality and in suitable locations thereby making it possible for the developers justify site selection despite neither of these having been allocated for educational purposes by the Council.</p> <p>OWGRA suggest that the BCC calculation offered - that on the basis of an extra 1600 extra children of school age 500 extra classrooms would be required - is probably a typo and state that assuming a class size of approximately 30, 1600 extra children would require an additional 50 classrooms.</p>	School Place Planning. More information regarding this type of infrastructure (school provision) can be found in the Infrastructure Delivery Plan 2019 which supports the Local Plan reviews.
St John's Residents Association (Community organisation)	The respondent states that school requirements need to be realistically demonstrated, and show how facilities will be provided in a way that supports residents close to their homes.	Comments Noted. Policies GWC3 and GWC7 of the plan set out the approach to delivering the necessary social and physical infrastructure. See also the Infrastructure Delivery Plan (IDP) 2019 which supports the draft submission version of the Plan.

<b>GWC IIA, Supporting Documents and Misc.</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
H. Mortimer (individual)	The respondent states that without a clear and realistic plan for additional educational and infrastructure facilities these will be insufficient for the increased population and workers, and draws attention to the impact of the large amount of development allowed in Brentford over recent years.	Comments Noted. Policies GWC3 and GWC7 of the plan set out the approach to delivering the necessary social and physical infrastructure. See also the Infrastructure Delivery Plan (IDP) 2019 which supports the draft submission version of the Plan.
P. Harding (Individual)	The respondent states that all new development requires more hospital, doctors, police, fire brigade facilities, schools (etc).	Comments Noted. Policies GWC3 and GWC7 of the plan set out the approach to delivering the necessary social and physical infrastructure. See also the Infrastructure Delivery Plan (IDP) 2019 which supports the draft submission version of the Plan.
Environment Agency (Government)	<p>The Environment Agency (EA) state that reducing flood risk should be a priority in the vision for the Great West Corridor; and that there should be a priority to work towards becoming prepared for climate change. The EA highlight the need to protect and enhance biodiversity and to create linkages between green areas and habitats should be prioritised in the Borough.</p> <p>The EA acknowledge the identification of flood risk presenting a major challenge for London, especially to boroughs like Hounslow, located on the River Thames and note that there is combination of risk from the river Thames, Brent and surface water in the area which should be referred to. The EA note that the Thames Estuary 2100 (TE2100) Plan is referred to in the policies in the Local Plan on flood risk and the Blue Ribbon Network (GB5 and EQ3) and request that reference to the TE2100 is made within the IIA. The EA note that LB Hounslow contains parts of the TE2100 Hammersmith and Twickenham policy units with the GWC area covering just the Twickenham policy unit. EA note that it is important that requirements for safeguarding land are incorporated into strategic plans, in particular site allocation documents for Thames riverside development.</p> <p>The EA are pleased some emphasis has been given to Local Wildlife Sites (LWS) in the IIA, and state that there is value in consolidating and improving green areas and preventing green areas from becoming</p>	Comments Noted. The IIA has been updated in line with comments received by the EA and this will support the draft submission version of the Plan. The flood risk of sites has been considered at part of the Strategic Flood Risk Level 2 which will assess all sites for flood risk in the GWC LPR and provide specific mitigation advice for individual allocations. The Local Plan 2015 policies will be applied to all applications to ensure the requirements for green and blue infrastructure are met.

GWC IIA, Supporting Documents and Misc.		
Respondent	Representation Summary	Council Response
	<p>fragmented or decreased in size and further linking of green areas will create valuable habitat networks. The EA request more emphasis is placed upon the importance of the Blue Ribbon Network in the plan area.</p> <p>The EA state that the presence of the River Brent requires reference be made to the Water Framework Directive and the Thames River Basin Management Plan (2015) as a key evidence base document within the IIA and as the latest measure or indicator of water quality in rivers and groundwater. The EA state that this will help to ensure the Plan includes consideration of the WFD current status, reasons for deterioration and action measures for the River Brent. The EA may seek financial contributions towards local river improvements where appropriate for developments in this area. The EA note that development alongside watercourses should consider the requirements of the Water Framework Directive (WFD) which includes causing no overall deterioration in water quality or the ecological status of any waterbody and that this objective should inform the IIA objectives.</p> <p>The EA state that following the publication of the West London Level 1 Strategic Flood Risk Assessment, LB Hounslow will need to take a sequential approach to the location of development to avoid areas at high risk of flooding and to comply with paragraphs 100-102 of the National Planning Policy Framework. The EA state that the IIA should include a summary of the outputs from the Level 1 SFRA as it relates to Hounslow and include objectives to avoid placing inappropriate developments in areas at risk of flooding, and reducing flood risk through redevelopment. The EA note that if there are specific sites proposed in areas at risk of flooding, a level 2 SFRA will be required to assess the flood risks in detail to determine their feasibility and whether they can pass the Exceptions Test, and that the revised climate change allowances will need to be factored into the updated SFRA and when assessing individual strategic sites.</p>	

<b>GWC Appendix 1: Site Allocations</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
Legal & General (Company)	<p>L&amp;G strongly supports the identification of the Estate (West Cross) as a mixed-use Site Allocation in the draft Plans and state that the site is capable of making a significant contribution towards the need both for new employment development and housing locally.</p> <p>L&amp;G considers that the draft Plans should:</p> <p>(i) Be clear that the Estate provides an opportunity for a new high-quality office destination aligned to the on-going shift in profile of the area and to optimise jobs. This is referred to in the justification to the Site Allocation within the Draft Great West Corridor Local Plan, however, L&amp;G state that there is currently ambiguity elsewhere in the documents concerning the nature of future employment development at the Estate. L&amp;G consider that the provision of offices at the Estate will be consistent with its access at the entrance to the new Brentford Golden Mile station and will not jeopardise the provision for light industrial type uses in the wider area holistically as sought by the London Plan.</p> <p>(ii) Be amended to refer to the Estate as having a greater residential capacity than is currently indicated. The masterplan at Appendix C illustrates that a greater contribution towards local housing need is capable of being made and to give greater certainty that the emerging London Plan housing target will be met. It has identified the opportunity for 1800 new residential units, together with circa 1 million sqft of high quality office and retail uses, from a design and townscape perspective.</p> <p>(iii) Be clear that mixed- use development in the area referred to as the West Cross Campus and including the Estate, will be supported in parallel with staged public transport improvement. L&amp;G consider that there is currently ambiguity that development might be limited to solely employment until the public transport improvements that are listed including the Crossrail Link, are all delivered. L&amp;G state that early</p>	<p>Support noted. The council has allocated the West Cross site for employment led mixed use on the basis of the provision of the Golden Mile Station, as part of the Great West Corridor West Place Policy. Regarding provision of uses not meeting the SIL designation, the council will, in line with the Draft London Plan, expect no net loss of industrial floorspace overall within the site, but will support its reconfiguration and use for increased industrial employment densities. The Great West Corridor Masterplan identifies an indicative layout for the site which would deliver policy requirements and these are reflected in the updated site allocation.</p>

<b>GWC Appendix 1: Site Allocations</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	residential development will contribute towards the pressing need for local housing, will assist in the early creation of a sustainable community where the need to travel is reduced and will also assist in the funding of public transport improvement.	
G R Planning Consultancy Ltd (Company)	G R Planning Consultancy Ltd express support for the proposals for their site in various figures, in particular that it is part of a business hub, non-residential frontage; part of an industrial quarter, that is includes a Local Landmark. G R Planning Consultancy Ltd express support, in particular, for the designation of the area as an important employment location, with particular emphasis on maintaining and strengthening its light industrial and commercial role, however G R Planning Consultancy Ltd note that the latter is not defined and state that it is unclear whether this includes retail businesses. G R Planning Consultancy Ltd also support the recognition that this location is not suitable for or required to meet future housing needs in the Borough.	Support Noted.
CBRE Global Investors (Company)	<p>CBRE Global Investors note that the Kew Bridge Distribution Centre site is covered by the LSIS designation, however, the diagram (Figure 4.3) also shows proposed office location on the site fronting the Great West Road. CBRE Global Investors state that this is inherently contradictory as office use would not typically be supported within an LSIS, and the justification for offices in this location has not been demonstrated through the policy approach nor evidence base. CBRE Global Investors note that Figure 5.8 shows a masterplan with only office frontage and no reference to industrial land uses.</p> <p>CBRE Global Investors strongly support the inclusion of residential uses behind the road frontage buffer (Part (n) of the policy approach), noting that the character of the wider area does include significant planned and existing residential development, and therefore the inclusion of this complementary land use is highly appropriate. CBRE Global Investors state that the wider transport and accessibility improvements both committed and proposed will likely further support the site as a strong residential development option.</p>	Comments noted. The Council intends to de-designate the site from LSIS designation, as set out in the map accompanying GWC1 Employment Growth.
High Sense Securities Ltd (Company)	High Sense Securities Ltd support the draft allocation for 110 Power	Support for allocation welcomed and comments noted.

GWC Appendix 1: Site Allocations		
Respondent	Representation Summary	Council Response
	<p>Road but state that the draft allocation should be amended to state up to 15,922 sq.m of employment floorspace as the amount of floorspace within the draft allocation has commercial implications for delivery, especially given commercial advice that a large pre-let is unlikely.</p> <p>High Sense Securities Ltd suggest a complimentary Hotel accommodation use be included in the draft allocation stated mix of proposed uses, in addition to the provision of a small element of retail / café / restaurant etc. (A use classes) ancillary to the overall uses of a development to improve facilities for workers.</p>	<p>The Council has considered the proposed amendments to the site allocations as part of the Site Allocations and Capacity Review (2019) and has made adjustments where considered appropriate to the aims of the plan.</p>
Canal and Rivers Trust (Non-profit organisation)	<p>Canal and Rivers Trust note the site allocation for a large offside site called 'Great West Plaza' between the road and rail bridge, south of the existing GSK site, allocated for residential and commercial development. Canal and Rivers Trust state that as this land fronts onto the Grand Union Canal, the Trust would be very keen to be involved in any pre-application discussions for the site, and requests that their details are passed on to the site owner.</p> <p>Canal and Rivers Trust note that the Grand Union Canal is referred to as the River Brent, in one part of the allocation description, and the Grand Union Canal in another and ask that this be amended to the Grand Union Canal, or the Grand Union Canal/River Brent. The Plan refers to the site as the 'River Brent Quarter', which is also confusing.</p> <p>Canal and Rivers Trust request that the allocation include reference to contributions required for the canal and towpath environment to support increased use of this sustainable travel route for pedestrians and cyclists, and as a valuable amenity resource. Canal and Rivers Trust understand that TfL's proposals for the future Cycle Superhighway 9 (CS9) are likely to include an improved junction for cyclists to connect to the towpath from the High Street.</p> <p>Canal and Rivers Trust note that the adjacent GSK site makes use of canal water for heating and cooling, and suggest that there may be</p>	<p>Comments noted. The Council encourages bodies and site owners to engage and is happy to act as a mediator. The allocation has been amended to reflect the comments made as well as comments relating to Boston Manor Park improvements.</p>

<b>GWC Appendix 1: Site Allocations</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>potential for exploring this efficient and sustainable technology at this site too. Canal and Rivers Trust state that the proposed transformation of Boston Manor Park should include improved access to the canal, and safe connections to surrounding areas.</p>	
Royal London Asset Management (Company)	<p>Royal London Asset Management support the allocation of the Phoenix Trading Park site for mixed employment and residential uses, particularly designation of the northern part of the site for residential use to complement its surrounding area.</p> <p>Royal London Asset Management strongly object to the proposed residential allocation of just 100 units and state that this is not based on strong urban design principles and would significantly under deliver the site's overall development potential. Royal London Asset Management state that subject to further assessment the site can deliver in excess of 500 units alongside replacement commercial floorspace which retains and enhances the site's employment capacity.</p>	<p>Support for allocation welcomed. Comment Noted. The Council has considered the proposed amendments to the site allocations as part of the Site Allocations and Capacity Review (2019) and has made adjustments where considered appropriate to the aims of the plan.</p>
Gillette Corner Holdings Ltd (Company)	<p>Gillette Corner Holdings Ltd request that reference should be removed to B2 uses and replaced with B1 to reflect the rapidly evolving nature of the digital industries sector, and the allocation should include a mix of B1 office/workspace with ancillary lifestyle, amenity, and shared facilities uses and a hotel use, and consider that this should be considered an employment generating use. Gillette Corner Holdings Ltd suggests a figure of 150 residential units and consider the minimum employment floorspace to be overly prescriptive.</p>	<p>Comment Noted. The Council has considered the proposed amendments to the site allocations as part of the Site Allocations and Capacity Review (2019) and has made adjustments where considered appropriate to the aims of the plan.</p>
McKay Securities PLC (Company)	<p>McKay Securities PLC consider that the 1000 Great West Road site allocation does not reflect the potential of the site or best align with the policies contained in the plan, and state that the site can take a larger range of uses, specifically residential, a larger building, and should be expanded to include the Enterprise Car and Van Hire site which is held under the same ownership.</p> <p>McKay Securities PLC propose the following changes to the allocation: increase Site Area from 0.66ha to 0.82ha if Enterprise Car and Van Hire Site, Boston Park Road included; increase potential employment (office)</p>	<p>Comment Noted. The Council has considered the proposed amendments to the site allocations as part of the Site Allocations and Capacity Review (2019) and has made adjustments where considered appropriate to the aims of the plan.</p>

GWC Appendix 1: Site Allocations		
Respondent	Representation Summary	Council Response
	<p>capacity from 30,800sqm to 31,382sqm; include 10,751sqm other commercial uses; include 30,516sqm (or 400 units) residential use; and, amend the allocation, justification and proposed use accordingly (Office to Employment (office), advertising, car park, residential and A1, A2, A3 uses).</p> <p>McKay Securities PLC consider that the masterplan recommends a mixed use development comprising office, residential, and at ground and first floor levels, class A1, A2, A3 and advertising uses - in addition 7,800sqm car parking. McKay Securities PLC state that the site is occupied by the Mille building which presents a redevelopment opportunity that could create a distinctive landmark at this gateway location which exists within an existing cluster of taller buildings.</p> <p>McKay Securities PLC state that the site is bordered by Key Existing office Location to the south, east and west, hence this site is suitable for additional office floorspace, and note existing residential uses in the area which suggests new residential use on site will be compatible with office use optimisation.</p>	
Tesco Stores Ltd (Company)	<p>Tesco Stores Ltd state that the allocation of the Tesco Osterley Extra should be amended to recognise Masterplan Option 1 as the preferred development for the site, and draw attention to a slight discrepancy between Figures 4.1 and 5.4 - with the former being consistent with Tesco.</p> <p>Tesco Stores Ltd note that as currently drafted, point (i) of Policy GWC P5 supports building heights of between 12 to 24m (i.e. 4 to 8 storeys), depending on surrounding sensitivities, as informed by Section 7.1.3 of the Masterplan ('Building Heights'), which identifies "up to 3 residential storeys" on the south and south west boundaries of the Tesco site, and "up to 5 storeys" across the rest of the site. Tesco Stores Ltd do not seek to challenge these general presumptions, however it is considered that in order for the plan to be suitably responsive to changing circumstances the policy ought to acknowledge that building heights</p>	<p>Comment Noted. The Council has considered the proposed amendments to the site allocations as part of the Site Allocations and Capacity Review (2019) and has made adjustments where considered appropriate to the aims of the plan. The council considers heights to be one of the main issues in the Great West Corridor Plan review given the sensitivity of the area and has therefore considered it important that these are clearly set out as part of the overall approach to placemaking. Support for the Southall Link is welcomed.</p>

GWC Appendix 1: Site Allocations		
Respondent	Representation Summary	Council Response
	<p>are not intended to create prescriptive limitations, but are provided as a general guide, and that a site-by-site assessment should be made when determining applications as in some circumstances building heights exceeding this range could be found acceptable.</p> <p>Tesco Stores Ltd support the Brentford-Southall rail link planned infrastructure in principle as this would assist with optimising the viability of the Western part of the Great West Corridor as an area for mixed use intensification.</p>	
West Chiswick and Gunnersbury Society (Community organisation)	<p>West Chiswick and Gunnersbury Society (WCGS) consider that the potential capacity of all site allocations and the phasing of their development will need to be adjusted depending on the policy options adopted.</p> <p>WCGS agree with the proposed uses for 110 Power Road but request that the potential capacity is reviewed in light of the restrictions placed on the height and scale of developments in Power Road by means of the draft Brentford East SPD (4.30) and adjusted if necessary. In commenting on 4.30 of the SPD, WCGS stated that they endorse the overall approach proposed for the height and scale of buildings in the Power Road estate and strongly agree that the relatively fine grain and intricate character of this area should be respected, and the impact on the residential properties of Thorney Hedge Road must be limited.</p> <p>WCGS note serious access and capacity issues at Gunnersbury Station.</p> <p>WCGS request that sites 27 Great West Road, 1053 Great West Road and Kew Bridge Distribution Centre should be amended so that the context and constraints include reference to the Brentford Stadium and associated residential towers to be built immediately across the railway line to the south. WCGS state that the residential component of development at this site will need to take account of the impact of the stadium scheme on views toward the Thames and issues of noise and light pollution will also need to be addressed.</p>	<p>Comments noted. In relation to 110 Power Road, Policy P3 of the Plan Review seeks to ensure that building heights and capacity reflect the character of the area.</p> <p>The Council has considered the proposed amendments to the site allocations as part of the Site Allocations and Capacity Review (2019) and has made adjustments where considered appropriate to the aims of the plan.</p>

<b>GWC Appendix 1: Site Allocations</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>WCGS note that the potential capacity for Units 1- 4 Capital Interchange Way is too high irrespective of which policy option with respect to growth is adopted, and refer to comments on GWC Policy P3. WCGS note that the context and constraints include reference to the Brentford Stadium scheme but state that this should indicate the site's close proximity to the Central Eastern and Capital Court sites of his latter scheme as these two sites alone have full planning consent for five tower blocks with a total of 410 residential units.</p>	
Greater London Authority (Government)	<p>The Mayor objects to the allocation of Green Belt, allotments and open spaces for development . The Mayor welcomes the potential intensification of employment uses, specifically industrial and office uses but is concerned about the extent of residential development proposed in Hounslow's SIL, LSIS and Key Office Locations. Whilst emerging London Plan policy E7 does allow for co-location of industrial use with other uses, Hounslow has not demonstrated how its allocations approach will intensify or increase industrial capacity and not compromise the continued functioning of the wider SIL and LSIS. The Mayor objects to the designation of housing within the SIL and LSIS as currently set out in the site allocations.</p>	<p>Comments noted. The Council proposes amending the SIL boundaries as part of policy GWC1 Employment Growth.</p>
Brentford Football Club (Company)	<p>Brentford Football Club promotes the potential of land at Jersey Road, Osterley to be included as a site allocation within the GWC Plan as a leisure/sporting/community hub including the retention and future enhancement of the existing sporting facilities. The site sits on land designated as Metropolitan Open Land (MOL) and is set in a suburban environment within a large area of green space extending generally northwards and eastwards from the site. Brentford Football Club state that they have operated training facilities from the site for in excess of 10 years. The allocation will facilitate the continued and future use of the site for open air recreational sports uses supported by relevant ancillary buildings providing facilities for the Club's First and B Teams, Ladies' Team, its community partner the 'Brentford FC Community</p>	<p>Comment Noted. The Council has considered the proposed amendments to the site allocation and has made adjustments where considered appropriate to the aims of the plan. The site has been assessed as not being appropriate for allocation in the plan.</p>

GWC Appendix 1: Site Allocations		
Respondent	Representation Summary	Council Response
	<p>Sports Trust', and other community uses - whilst affording the appropriate protection of the openness of the MOL. Brentford Football Club state that the allocation would not be a departure from national, London and local planning policies and will further enhance the site's potential as a hub for sporting activity.</p>	
Be Living (Company)	<p>Be Living is broadly supportive of the Tesco Osterley Extra Syon Lane site being allocated for residential and employment led redevelopment and is pleased that the site's unique potential to contribute to the regeneration of the Great West Corridor and complement the surrounding business and employment and enterprise hubs has been recognised.</p> <p>Be Living state that the development parameters derived from the Great West Corridor Masterplan Study (2017) are not deliverable for a number of commercial and operational reasons: Tesco do not wish to redevelop their existing store and are in advanced discussions with Be Living to sell part of the surface car-park to the west for residential redevelopment and with these advanced negotiations in place, Be Living welcome amendments to the site allocation which facilitates the release of the car park element of the site for residential development. Be Living state that the prescriptive text around the number of residential units, amount of retail floorspace and the amount of replacement car-parking should all be deleted and the allocation support a range of development parameters underpinned by a thorough detailed design assessment. Be Living welcome the opportunity to work with the Council to assist with evolving the development parameters for the allocation and consider this approach will enable the car-park site to come forwards within the short term and assist the LBH in meeting the emerging London Plan housing targets.</p> <p>Be Living consider that the Fountain Leisure Centre site should also be allocated as it can help deliver residential development that will assist LBH in meeting and exceeding the minimum housing delivery targets set by the GLA.</p>	<p>Comment Noted. The Council has considered the proposed amendments to the site allocations as part of the Site Allocations and Capacity Review (2019) and has made adjustments where considered appropriate to the aims of the plan.</p>

GWC Appendix 1: Site Allocations		
Respondent	Representation Summary	Council Response
	<p>Be Living note reference to re-provision and redevelopment of the site in the Draft Brentford East Planning and Design SPD but consider that the site should be allocated for development within the Local Plan Review as part of a residential led enabling development that specifically states that the re provision of Fountain Leisure Centre will be expected as part of any proposed development of the site. Be Living consider the site is in a highly sustainable location, directly adjacent to significant regeneration and any development (including the Leisure Centre) could also provide a substantial amount of new homes, which would assist LBH in meeting and exceeding their housing targets.</p>	
LaSalle Investment Management (Company)	<p>LaSalle Investment Management note 27 Great West Road and 1053 Great West Road are allocated jointly for mixed use development comprising residential, office, retail and other commercial uses as well as part of new Lionel Road Station with a station square and support the range of uses proposed as this allows flexibility to deliver appropriate mixed use development in the future.</p> <p>LaSalle Investment Management state that it is becoming increasingly imperative that office sites have on-site amenities and facilities such as cafes, restaurants and gyms. As such, a wider range of uses should be included in the site allocation to ensure that the enhanced office development is commercially viable, attractive to businesses and competitive. LaSalle Investment Management note that the allocation states that the site is part of new Lionel Road Station with potential to provide a station square, however raise concern that the extent of land required to deliver the station has not been made clear, and therefore an assessment of how this will impact on the development viability of the site has not been possible. LaSalle Investment Management note that the delivery of the Lionel Road Station is identified as critical to the Plan and that 27 Great West Road is subject to a number of the strategic infrastructure requirements. LaSalle Investment Management state that the proposed restriction of building heights and the unknown extent of land required for the delivery of the proposed infrastructure</p>	<p>Comment Noted. The Council has considered the proposed amendments to the site allocations as part of the Site Allocations and Capacity Review (2019) and has made adjustments where considered appropriate to the aims of the plan.</p>

GWC Appendix 1: Site Allocations		
Respondent	Representation Summary	Council Response
	<p>projects make the site's deliverability and viability uncertain.</p> <p>LaSalle Investment Management request that the Council work collaboratively with them to ensure that the site allocation is deliverable and viable and the site's capacity and justification for the buildings should be reviewed in the context of the potential site's contribution to the GWC Plan-wide infrastructure requirements.</p>	
Day Group (Company)	<p>Day Group Ltd state that they hold a long lease in respect of land at Transport Avenue extending to 3.8 hectares including a range of industrial, waste, railway sidings and associated uses. There are a number of additional industrial activities occurring on the site relating to aggregates and recycling, as well as a concrete batching plant. Day Group state that they are the freeholders of land at 946 – 948 Great West Road and adjoining car park to rear, comprising the BSS warehouse and two car parking areas.</p> <p>Day Group Ltd set out in previous consultation response the importance of the Transport Avenue site as a Strategic Industrial Location (SIL) which incorporates railway sidings should not be underestimated. The site comprises part of a network of sites around the country which contribute toward the sustainable movement of material by rail rather than by road. Day Group Ltd note protections for operations carried out on site as set out in by the NPPF (Paragraphs 142 and 143). Day Group welcomes safeguarding the attractiveness and competitiveness of the Strategic Industrial Locations (SIL) and the designation of the site for employment use.</p> <p>Day Group support wording around minimising and mitigating any significant adverse impacts that development may have on surrounding land use and consider that it should be further strengthened as protection of existing industrial uses from new noise sensitive uses is essential. This is supported by Paragraph 123 of the NPPF.</p> <p>Day Group are concerned that the redevelopment of nearby sites for</p>	<p>Comment Noted. The Council has considered the proposed amendments to the site allocation and has made adjustments where considered appropriate to the aims of the plan. As part of the Golden Mile Station Quarter, the West Cross Campus to be redeveloped for mixed-use including residential development in compliance with Agent of Change principles, and ensure no harm to the future integrity of adjacent and nearby industrial operations, following the indicative layout identified in the Masterplan.</p>

GWC Appendix 1: Site Allocations		
Respondent	Representation Summary	Council Response
	<p>mixed use development including residential uses, such as at West Cross Industrial Estate, could result in a potential conflict which will affect their existing and future operations. Day Group request that any residential development in proximity of the site needs to ensure that this would not impact on the operations of the SIL and railhead and It is therefore imperative that the implications of existing and potential noise from operations of the SIL and railhead are adequately assessed in any planning application to ensure that they can be effectively mitigated by the layout and design of the development, are not prejudiced and that adequate levels of amenity are provided for future occupants of any proposed development in the area.</p> <p>Day Group query how the proposed pedestrian/cycle routes are shown on Figure 4.6 as one of the routes crosses the railway sidings within our clients site, which does not seem practical. Day group assume this is indicative and have no objection to trying to improve pedestrian and cycle routes but want to bring this to the Council's attention.</p> <p>Day group put forward 946 – 948 Great West Road for re-development in the medium/long term (five years +) previously, and state that the site is well located in close proximity to the new station and as such will be in a sustainable location that could be included in developing the site as part of a larger site should this be possible. Day Group consider that this site could include offices, a hotel or a car showroom and would enhance the frontage onto Great West Road in keeping with the regeneration aims of the Great West Corridor. Day Group note that this site has not been progressed as an allocation and we would urge the Council to reconsider this. Alternatively, Day Group welcome the guidance on page 41 which seems to support mixed use development along the corridor and would appear to allow for this type of development on this site subject to meeting other requirements.</p>	
London Diocesan Fund (Company)	London Diocesan Fund note London Plan housing delivery (at least 822 units pa), Hounslow's Objectively Assessed Need (calculated to be 1,898 dwellings per annum) the draft London Plan's housing targets which	Comment Noted. The Council has considered the proposed amendments to the site allocations as part of the Site Allocations and Capacity Review (2019) and has

GWC Appendix 1: Site Allocations		
Respondent	Representation Summary	Council Response
	<p>increase Hounslow’s housing target which equates to 2,182 units per year) and the requirement that Hounslow increase their housing numbers by 1,360 units per year, which equates to an uplift of 165% on 2015 – 2025 adopted targets.</p> <p>London Diocesan Fund suggest that Hounslow needs to identify additional housing sites over and above the sites identified in the adopted Plan to achieve the required uplift in housing and suggests that the Council consider sites such as Rectory Meadow be identified and included in the site allocations and consider that the Council should include appropriate sites which lie outside of the Great Western Corridor to help achieve the higher housing.</p> <p>London Diocesan Fund provide a detailed description of the Rectory Meadow site and consider an alternative residential land use for the site would be appropriate subject to an architect’s feasibility study supported by necessary technical information, with exact residential densities identified through a masterplan led approach supported by a green infrastructure strategy. London Diocesan Fund estimate completion 5 years PTAL 1b Estimated Gross Dwellings 84-180, estimated Dwellings per hectare 35-75 estimated additional housing 84-180 Site Area 2.4 ha and that overall the site meets the Council’s criteria.</p>	made adjustments where considered appropriate to the aims of the plan.
A. Allanach (Individual)	The respondent agrees with the proposals in the site allocations, subject to comments on retail space (see GWC West Place response).	Comment noted.

## Detailed summary of the consultation responses on the WoB Local Plan and our response to the issues raised

WoB Spatial Vision and Strategic Objectives		
Respondent	Representation Summary	Council Response
Canal and Rivers Trust (Company)	Canal and Rivers Trust claim that figure 4.1 indicates cycle routes through the area close to the canal but not along the canal itself. Canal and Rivers Trust consider that these cycle routes should be linked with the canal, with supporting signage on both sides.	Comment noted and the Figure in the Open space diagram and transport diagram has been amended accordingly
Be Living (Company)	Be Living supports the Spatial Vision for the West of Borough and considers the regeneration of areas within the area are key in meeting and exceeding the potential of the Borough, noting that the area provides unique opportunities for growth. Be living considers that the vision appears to exploit these opportunities for the betterment of the existing and future residents of LBH and those employed within the Borough. Be Living agrees with the Strategic Objectives for the West of the Borough and says the themes raised within the objectives are important issues throughout Hounslow, London and the UK and should be partially addressed through planning policy. Be Living suggests increasing housing delivery alongside economic growth should remain a priority for LBH. Be Living states that improvements to open space, connectivity, design/heritage and health and wellbeing are also important and the six objectives should work in parallel with one another to achieve the vision for the West of the Borough.	Support welcome
Windowflowers Ltd (Company)	Windowflowers Ltd support the Council's overall objective to facilitate growth and investment within this part of the borough. Windowflowers Ltd support the aspiration for a new railway station at Clockhouse Roundabout, as this will significantly improve accessibility to this part of Hounslow, in addition to adding further sustainable transport links to Heathrow Airport. Windowflowers Ltd raise no objections to the aspirational and positive approach being set out within the Spatial Vision; albeit it may be useful to ensure that the vision also includes reference to the specific targets for growth and development such that there is a measure against which the Plan can be judged when later reviewed. Windowflowers Ltd support objectives in principle, but	Support welcome and further clarification is set out in the Council's supporting Exceptional Circumstances background paper

WoB Spatial Vision and Strategic Objectives		
Respondent	Representation Summary	Council Response
	request further clarification in relation to the objectives for Metropolitan Open Land and Open space, particularly in relation to the proposals for the Green Belt.	
Friends of the River Crane Environment (Charity)	<p>Friends of the River Crane Environment (FORCE) raise concerns that the WoBP will miss the opportunity to make a contribution towards the realisation of the 100-year-old vision for a West of London Regional Park. FORCE believes that the WoBP can make a significant contribution to Heathrow's Airport and support in the promotion of green spaces and housing/employment developments are focused on improving the livelihoods of WoB residents. FORCE states that alongside these developments, investment in the quality of open spaces and a strategic approach can improve health and wellbeing, redress the inequities in quality of life and life expectancy and support healthy, low-cost access to housing and employment opportunities. FORCE consider the WoBP emphasises growth and neglects counterbalancing environmental improvement with the WoBP providing more detail on development than green infrastructure and the quantum and quality of open space. FORCE says WoBP is vague about the environmental impacts of development and about any proposals for environmental improvement. FORCE states that the focus of WOB4 is on Green Belt de-designation and comparatively few new public open spaces are proposed, and raises concern around how green spaces would be enhanced. FORCE notes that the "Duty to cooperate" section (p17) mentions the Council's membership of the Heathrow Strategic Planning Group and the West London Alliance, but does not acknowledge membership of the Crane Valley Partnership for addressing "strategic and cross-boundary" environmental issues. FORCE states that the WoBP will not only fail to deliver three of its priorities: "for our children and young people...improvements in health," "A cleaner, greener borough" and "Active, healthy communities." FORCE state that It will actually make all three worse for the following reasons: it will reduce the total amount of green space available in the borough; the reduced area of green space will be subject to much increased utilisation and degradation from the increased numbers of residents and employees; and proposed new</p>	<p>Comment noted. The WoB Plan is considered to be balanced in its approach to meeting objectively assessed needs for homes and jobs whilst delivering green enhancements to the local environment, including green infrastructure improvements, and taking measures to improve the health and wellbeing of residents. The Council has been engaging in the production of the draft Colne and Crane Valleys Green Infrastructure Strategy by Colne Valley Regional Park and the Crane Valley Partnership as part of HSPG - Recommendations from the draft Green Spaces strategy has been taken forward in the Plan. Our engagement with CVP throughout the plan-making process will be outlined in the Duty To Cooperate Statement (unless any issues arise requiring further engagement through a Statement of Common Ground)</p>

WoB Spatial Vision and Strategic Objectives		
Respondent	Representation Summary	Council Response
	public spaces, improvements to existing spaces and new pedestrian/cycle routes will fail to offset these pressures. FORCE state that the WoBP fails to give due weight to the extensive research into the economic benefits of green infrastructure now available.	
Sports England (Government)	Sport England supports objective 6 in Design and Heritage and recommends that the Council includes a further requirement to seek development that encourages Active Design. Sports England supports objective 11 and 12 to encourage shared facilities and co- location of uses and improve the quality, range of accessibility of services and facilities; leisure opportunities and training services, to promote active lifestyle can healthier choices that links with the high quality green infrastructure. Sports England note that the Council has undertaken a Playing Pitch Strategy and Built Facilities Strategy to underline the Council's development plan in accordance with the guidance in the NPPF. Sports England states that in order to achieve these objectives the Council should seek to implement the findings from these studies within this plan.	Support noted and the Council has expressed this in the supporting text for the Open Space Policy WoB4 and Design policy also states 'Development will be subject to a high quality and comprehensive design process where appropriate using the Council's Design Review Panel resulting in high quality design outcomes. The approach to design will also respect the principles of Accessible and Inclusive Design, Secured by Design and Sport England's Active Design'
SEGRO (Company)	SEGRO supports the spatial vision for the WoB, stating that it gives focus and direction for creating the right conditions to support the growth ambitions of The London Plan, providing a positive framework upon which to formulate efficacious policies and a spatial strategy for maximising the benefits of Heathrow Airport irrespective of the delivery of a third runway. SEGRO support the Council's strategic objective of encouraging economic development that will benefit from the commercial opportunities presented by growth at Heathrow Airport. SEGRO claim that this approach will contribute to building a strong, responsive and competitive economy by ensuring significant development is located in the right place at the right time to harness the Airport's strategic potential. SEGRO say that the local authorities are under pressure to build new homes and are struggling for a balance and note the acceleration in the loss of industrial land in London given Permitted Development Rights and competition from other uses. SEGRO note Table 2.8 of the London Industrial Land Supply and Economy Study 2015 which confirms that in Hounslow there has been a	Support and Comment noted and the direction of a no net loss of employment spaces is taken forward in the plan

WoB Spatial Vision and Strategic Objectives		
Respondent	Representation Summary	Council Response
	loss of 15.5 hectares of industrial land set against a benchmark of 15 hectares for the 20 year period to 2031. SEGRO state this calls for a change in approach from the managed release of industrial land to policies that safeguard employment land to support balanced growth / sustainable patterns of development as recommended in Paragraph 6.21 of the Hounslow Employment Land Review. SEGRO state this needs to be reflected in Plan policies. SEGRO note the Draft London Plan which acknowledges industrial, logistics and related uses are essential to the functioning of London's economy. SEGRO note the Draft London Plan seeks to retain sufficient industrial and logistics capacity by seeking, as a general principle, no overall net loss of industrial floorspace capacity across London in designated Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs).	
T. Henderson (Individual)	The respondent does not agree with the large scale re-designation of much of the existing Green Belt land and considers that Southern Rail Access to Heathrow is likely to be more successful via a route through Staines. The respondent agrees that connectivity of pedestrian and cycling networks should be improved and strategies employed to reduce road vehicle access to Heathrow	Comment noted , this is still a viable option that would increase sustainable transport options in this part of the borough and improved Public Transport Accessibility (PTAL) in the area
Heston Residents' Association (community organisation)	Heston Residents' Association does not agree with the Spatial Vision or the Strategic Objectives for the West of Borough Plan.	Objection noted and the vision and objectives have been amended to reflect the on-going engagements with the community organisations, residents, businesses and landowners
LB Hounslow Public Health (Government)	LB Hounslow Public Health agrees with the Spatial Vision but would like to see the word 'health or healthy lifestyle' given further mention, including design to help support residents of all ages to life a healthy lifestyle across all ages. LB Hounslow Public Health note that Health and Wellbeing is otherwise mentioned throughout the rest of the document. LB Hounslow Public Health agrees with the Strategic Objectives.	Comment noted and taken forward in Health and Wellbeing policy WoB3
Hounslow Cycling (Charity)	Hounslow Cycling supports the focus on accessible neighbourhoods and states that the network of walking & cycle paths linking new and existing neighbourhoods needs to be accessible for those who use bicycles as mobility aids and need to have easily legible signposting into	Support noted Policy WoB5 has been amended to reflect recommendations and further discussion with transport colleagues and TfL.

WoB Spatial Vision and Strategic Objectives		
Respondent	Representation Summary	Council Response
	and out of Feltham centre. Hounslow Cycling agrees that enhanced cycling infrastructure will aid in the alleviation of congestion in the West of the Borough, will make healthy travel easier and could help to reduce the growth in polluting forms of transport. Hounslow Cycling supports the focus on reducing congestion, pollution, and reliance on private cars but note that for cycling to be a realistic alternative to private car use, clear protected cycle routes at major road junctions are essential.	
H. Andrews (Individual)	The respondent does not agree with the Spatial Vision or the Strategic Objectives for the West of Borough	Comments noted.
London Diocesan Fund (company)	"The London Diocesan Fund agrees with the Spatial Vision or the Strategic Objectives for the West of Borough "	Support welcomed
R. Clarke (individual)	"The respondent does not agree with the Spatial Vision for the West of Borough. The respondent states that the strategic objectives focus too much on Heathrow airport and ignores existing needs and opportunities for improving connections to the south, including opportunities for making the most of spillover of connections to neighbouring areas such as Richmond, Twickenham and Hampton. The respondent notes The River Crane and associated rivers (Longford, Duke of Northumberland) are assets that should be made the most of, and a high level objective should be improving the quality of open space and completing any breaks in the access along this important green chain (e.g. A4, Marshalling Yards / railway line Calvary tunnel). The respondent states there is a major need to reduce the traffic pinchpoint in Feltham High Street, and open up new ways of crossing the railway line. The respondent notes that there is an opportunity for creative industries and regeneration through arts and a high level objective should be improving quality of life, achieved through a community-led approach to urban development in existing centres. The respondent considers that Point 13 on noise needs to consider flight paths on Easterly departures, and the need to ensure that town centres such as Feltham are not overflowed by noisy planes deviating from set routes.	Comment noted and vision and objectives have been amended to reflect the on-going engagements with the community organisations, residents, businesses, landowners and stakeholders. The comment regarding ensuring that town centres such as Feltham are not overflowed by planes deviating from set routes has been incorporated in our overall comment to Heathrow consultation
G. Pollitt (individual)	The respondent does not agree with the Spatial Vision for the West of Borough but does agree with the Strategic Objectives for the West of Borough.	Comment noted and vision and objectives have been amended to reflect the on-going engagements with the community organisations, residents, businesses ,

<b>WoB Spatial Vision and Strategic Objectives</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
		landowners and stakeholders
"Boundaries Road Residents Association (Community organisation) "	The respondent does not agree with the Spatial Vision or Strategic Objectives for the West of Borough	Comment noted.
S. Ambrose (Individual)	The respondent agrees with the Spatial Vision or Strategic Objectives for the West of Borough	Support welcomed
Noyces Funfair (company)	The respondent does not agree with the Spatial Vision or Strategic Objectives for the West of Borough	Comment noted.

<b>WoB1 Housing</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
Greater London Authority (Government)	GLA note that draft new London Plan policy H12 states boroughs should not set prescriptive dwelling size mix requirements for market and intermediate homes.	Comments Noted. The Council recognises that there are significant affordability issues in both the borough and wider London Market, and the WoB Local Plan review have been updated to reflect the affordable housing position in the Mayor's Housing SPD, and ensure it is in general conformity with the changes in the Draft London Plan to affordable housing.
Be Living (Company)	<p>Be Living generally support the preferred policy, however consider that policy should also support the provision of PRS and Build to Rent schemes it is considered the area has potential for growth and delivery of these housing products in the future.</p> <p>Be Living considers that the initial proposed capacity for new homes in the area is premature due to the publication of the draft Replacement London Plan which will revise the existing housing delivery targets. Therefore these targets should be reviewed.</p> <p>Be Living suggest the following sites should also be allocated as they can help deliver residential development that will assist LBH in meeting and exceeding the minimum housing delivery targets set by the GLA: Bedford Lane Scout Hut, Stoneywall Community Centre and McDonalds/Sue Ryder, Feltham. Be Living provide additional</p>	<p>Comments noted. The Local Plan Review Housing Policies contain detailed policies on PRS and Build to Rent which comply with the proposals in the Draft London Plan. In addition, the plan recognises and seeks to meet the targets in the Draft Plan for the Opportunity Areas.</p> <p>The council has considered the proposed site allocation and has made adjustments where considered appropriate to the aims of the plan.</p>

WoB1 Housing		
Respondent	Representation Summary	Council Response
	information on these sites within their representation.	
Windowflowers Ltd (Company)	<p>Windowflowers Ltd support the housing targets set out within the draft West of Borough Plan, and the Council's desire to meet the identified housing need over the life time of the Plan, and where appropriate to exceed it in line with national requirements.</p> <p>Windowflowers Ltd support the content of draft policy WOB1 but raise concerns on flexibility, namely confirmation on whether suitable flexibility has been incorporated into the plan to address potential delays in delivery of some sites, including matters of development viability, ownership issues etc. Windowflowers Ltd state that failure to ensure sufficient alternative locations for growth and development could result in the Council failing to meet their aspirational growth requirements and failing to maximise the potential benefits to be achieved through the expansion of Heathrow Airport. Windowflowers Ltd do not therefore support the alternative policy options currently put forward for both draft policies WOB1 and WOB2, given the unacceptable focus on the new railway station on the levels of growth to be delivered and the apparent lack of flexibility.</p>	<p>Support welcomed.</p> <p>Comments noted. The Council has completed a Site Allocations and Capacity Assessment (SAC) which has sought to fully explore options and capacity for growth. Chapter 6 of the plan focuses on ensuring that the development of sites is predicated on delivery of physical and social infrastructure to support them.</p> <p>The alternative policy options considered for policies WOB1 and WOB2 aim to ensure that the plans support the delivery of much needed jobs and homes.</p>
Historic England (Government)	Historic England welcome the Borough Council's aspirations in terms of optimising housing growth at policy WOB1, particularly as this language offers the opportunity to ensure that new housing development takes a contextual approach to its design. Historic England consider that making reference to this context and the need for new development to take its cue from existing local character within the policy wording would be a significant step in using the evidence base and providing a positive strategy for the historic environment and suggest that the Character Study be referenced in the supporting text.	Support noted.
Friends of the River Crane Environment (Charity)	Friends of the River Crane Environment (FORCE) note the Mayor's London Plan urges housing targets be 'augmented' "where further opportunities can be created for sustainable growth", and FORCE maintain that growth which can only be achieved by the permanent renunciation of Green Belt is by definition not "sustainable." FORCE is not opposed in principle to the Heathrow Opportunity Area being used	Comments noted. The council has conducted a Green Belt Review in order to ensure that the boundaries remain defensible and therefore sustainable in the future.

WoB1 Housing		
Respondent	Representation Summary	Council Response
	to provide housing that exceeds borough needs as a contribution towards the London Plan, however FORCE strongly oppose using de-designated Green Belt land to enable this.	
J. Stewart (individual)	The respondent considers housing policy should consider build homes for people that work in London but cannot afford London prices, whilst creating an environment that city people want. The respondent considers that housing is not affordable in the area, and whilst house prices in Feltham are among the lowest, these are being rented out.	Comments noted. Policy WOB2 Housing Growth aims to encourage developers wherever possible to market dwellings delivered to people who live and work in Hounslow and London
Tidal Crane Association (Non-profit organisation)	<p>The Tidal Crane Association (TCA) note that the Council will deliver a minimum of at least 11,000 new dwellings in West of Borough area in the plan period (2018 to 2033), and that draft Policy WOB1 identifying a target of 2,100 homes at Heathrow Gateway, with delivery being dependent on the delivery of the Southern Rail Access. The TCA note the consultation document sets out how the Council confirms it will not be able to optimise housing supply unless critical infrastructure such as Southern Rail Access station is delivered, and consider that there is uncertainty regarding the delivery of a number of the Council's proposed allocations, particularly the large, strategic safeguarded Heathrow Gateway site which is dependent on the delivery of the rail link.</p> <p>The TCA note draft WOBLP identifies a number of 'alternative policy options' in the event that the Southern Rail Access proposal is not carried forward, or is implemented in a way that it does not enhance the connectivity in the West of Borough, and state that the Council acknowledge a reasoned possibility that the proposal may not be implemented. The TCA note that the Council intends to work with the GLA, TfL, and DfT to identify improvements that will enhance connectivity and public transportation access in the West of Borough Area without an additional rail hub in the area but consider it to be extremely high risk for Hounslow to base such a high proportion of identified housing supply on uncertain infrastructure delivery given possible project delays.</p>	Comments noted. The Heathrow Gateway is identified as a broad location for growth, indicating that the council will seek to deliver the site but will considers this to be dependent on the delivery of the Southern Rail Access. The plan contains a housing trajectory demonstrating the give year housing land supply position.

WoB1 Housing		
Respondent	Representation Summary	Council Response
	<p>The TCA recommend another site, land at Feltham, which offers a highly sustainable site available now, is in a single land ownership and is deliverable without any infrastructure requirements that have long-lead in times. Details of the site are given in the representation.</p> <p>TCA note the draft local plan contains no breakdown of how a five year housing land supply will be maintained over the plan period nor does it include a housing trajectory for how it will deliver even the 11,000 dwellings, and state that without this content the plan cannot be seen to be effective or justified.</p>	
Royal London Asset Management (company)	<p>Royal London Asset Management (RLAM) welcome the optimisation of the supply of housing in the West of Borough Area to help meet the borough's objectively assessed needs. RLAM consider that the redevelopment of the site to provide new homes is essential to delivering the aspirations of the Local Plan Review.</p> <p>RLAM note the Local Plan Review sets out that "the Council considers its objectively assessed need of housing in the borough to be 1,898 dwellings per year" and the acknowledgment that a huge step change will be required in housing delivery in order to meet this need. RLAM note that the Local Plan Review was prepared before the draft new London Plan was published and the housing target for the Borough has now increased further (increased to 2,182 dwellings per annum). RLAM state that in order to ensure that the housing requirement can be met over the Plan period it will be necessary to ensure sufficient sites are identified and allocated for residential use.</p> <p>RLAM consider that the redevelopment of the site within RLAM ownership, on the periphery of Bulls Bridge Industrial Estate, provides an excellent opportunity to deliver much needed additional housing in the Borough and meets the criteria for development set out in the "Optimising Housing Growth" section of the Local Plan Review. RLAM recommend the site be allocated for residential development and provide additional information in their representation.</p>	<p>Comments noted. The Council has conducted the Site Allocations and Capacity Assessment (SAC) 2019 which has identified sites for growth, including this site. The site was not considered to not be an appropriate location for growth within the plan period.</p>

WoB1 Housing		
Respondent	Representation Summary	Council Response
	<p>RLAM consider that a bespoke approach to housing mix is often most appropriate when assessing development proposals and therefore support a policy approach to housing mix that allows for the constraints and opportunities of each development site to be taken into account, and does not set overly prescriptive requirements that would not be appropriate in all areas. RLAM consider their site could make a significant contribution to the delivery of a significant number of homes required in the Borough and could accommodate a mix of dwellings.</p> <p>RLAM note Local Plan Review includes how the Council will continue to pursue a strategic affordable housing target of 40% through private development. RLAM welcome the acknowledgement by the Council that the provision of affordable housing will need to be considered alongside viability considerations and consider that developers should be given the opportunity to submit evidence which demonstrates the level of affordable housing that can be provided without jeopardising the viability of the development in accordance with the NPPF .</p>	
Heston Residents' Association (community organisation)	Heston Residents' Association do not agree with the Housing Growth preferred policy option, the initial proposed capacity for new homes. Heston Residents' Association consider that there in addition to the sites identified in figure 4.3 of the Draft Local Plan Review, there are further sites that could be brought forward to deliver housing in the plan period and that there are additional or alternative policies that the Council should consider in relation to Housing Growth, however no examples of alternative sites or policies are provided.	Comments noted.
LB Hounslow Public Health (Government)	LB Hounslow Public Health recommend new housing meets the following criteria: provision of adequate internal spaces for bike storage, dining and kitchen facilities; adequate private or semi-private outdoor space per dwelling; car parking spaces are minimised across the development; well-designed buildings with passive surveillance; housing should have access to safe and easy-to-get-to play and recreational spaces for all, with passive surveillance; and ensure places	Comments noted. The WOB Plan review contains a Health and Wellbeing Policy (WOB3) which ensures the delivery of equitable development.

WoB1 Housing		
Respondent	Representation Summary	Council Response
	planned to be 'dementia friendly'.	
H. Andrews (Individual)	<p>The respondent does not agree with the Housing Growth preferred policy option and states that the policy does not describe what sort of housing and is very vague and difficult to comment on. The respondent notes the ageing population and states that no mention is made as to facilities for elderly people and the need for more care homes and sheltered housing. The respondent asks whether Hounslow Council is liaising with Spelthorne on matters relating to health care provision. The respondent notes the proximity of Ashford, but ask how, with the walk required to the centre and with the increase in traffic in the area given population growth, residents are supposed to get to West Middlesex Hospital.</p> <p>The respondent states that the initial proposed capacity for homes is much too high, and notes need for family homes (houses, not flats). The respondent questions ambitions for place making and adequate provision of gardens for our children to play. The respondent states the plan prioritises quantity over quality, noting the experience of the High fields Estate and Grenfell Towers.</p> <p>The respondent states that making more arrangements for elderly residents would free up homes and also hospital beds and claims residents in Feltham are being forgotten about.</p>	<p>Comments noted. The WoB Plan Review should be read alongside out existing Local Plan (2015). Poly SC8 in the Local Plan encourages the provision of Specialist and Supported housing in line with the results of the Strategic Housing Market Assessment (2018).</p> <p>The WoB Plan Review aims to meet the identified need in the SHMA, including that for older people and specialist housing.</p>
London Diocesan Fund (company)	<p>London Diocesan Fund agrees with the Housing Growth preferred policy option. London Diocesan Fund does not agree with the initial proposed capacity for new homes and states that, following the revised London Plan housing targets, the proposed capacity should be higher within the borough. London Diocesan Fund states that, in addition to the sites identified in figure 4.3 of the Draft Local Plan Review, there are further sites that could be brought forward to deliver housing in the plan period.</p>	<p>Comments noted. The Plan has been amended to ensure it is in general conformity with the Draft London Plan.</p>
R. Clarke (individual)	<p>The respondent states that there needs to be more consideration of the southern part of the borough, and the potential for regeneration and improving the coherence of Hanworth, and more consideration could</p>	<p>Comments noted. The council has taken a pragmatic approach to balance our need for housing and employment across the borough, with the preservation</p>

WoB1 Housing		
Respondent	Representation Summary	Council Response
	<p>be given to the potential importance of Hanworth Park House, and sites around Feltham brook and the southern periphery of Feltham. The respondent states that the heritage of Feltham Marshalling Yards needs to be recognised, as well as its importance. Finally, consideration should be given of the 'village character' of Feltham town centre - particularly around the train station, with any new buildings should take into account the heritage, and importance of the green environment. The respondent states that high rise developments in these locations risk damaging the character of the area, and need to be sensitively handled.</p> <p>The respondent states that the plan must be community-led, and it is inappropriate to redevelop land that is occupied by community groups or individuals against their will and alternative sites which should be explored.</p> <p>The respondent states that consideration needs to be made of the green links, with 'Filling in' key parts of a green chain being against the NPPF and policies of the Lawton Review.</p> <p>The respondent considers that there may be existing industrial locations that could be converted to housing (e.g. industrial land next to Donkey Wood). The respondent states that that there are many sites in East London with additional capacity and that with the new Crossrail trains it will no longer be necessary for these people to live in West London to work at Heathrow.</p> <p>The respondent notes potential of Land in Dukes Meadows (redeveloping sports centres with Housing on top), Feltham Young Offenders site, Land between Ludlow Road, Snakey Lane and Felthambrooke road.</p> <p>The respondent states that no community groups are evicted from their current premises, or Show people evicted against their will to provide housing, and that a mix of high quality homes is required. The</p>	<p>and enhancement of historic character. The council has conducted a Strategic Housing and Economic Land Availability Assessment known as the Site Allocations and Capacity Assessment (SAC) 2019 which has attempted to identify sustainable locations for growth, including several sites in Hanworth, and several industrial sites. Feltham has been identified as a highly sustainable location for growth which ensures this growth brings benefits to the local area.</p>

WoB1 Housing		
Respondent	Representation Summary	Council Response
	respondent notes the proportion of people with higher qualifications in the area is low, and considers that many people are choosing to leave the area, partly due to overcrowding. The respondent states that there needs to be effort to retain these people.	
G. Pollitt (individual)	<p>The individual does not agree with the Housing Growth preferred policy option, stating that there are areas that have not been considered for housing use e.g. old marshalling yards and the old Feltham feast site. The respondent considers that the initial proposed capacity for new homes is fine if all other services are in place, as medical facilities are already stretched and people have at least a week to access their doctors practise.</p> <p>The respondent states that in addition to the sites identified in figure 4.3 of the Draft Local Plan Review the old marshalling yards and the Feltham Hotel/Feast site should be considered. The respondent suggests that there are additional or alternative policies that the Council should consider in relation to Housing Growth, but does not provide any examples in their representation.</p>	Comments noted. The Council has conducted a Strategic Housing and Economic Land Availability Assessment known as the Site Allocations and Capacity Assessment (SAC) 2019 which has attempted to identify sustainable locations for growth, including several sites in Hanworth, and several industrial sites. Feltham has been identified as a highly sustainable location for growth which ensures this growth brings benefits to the local area.
Boundaries Road Residents Association (Community organisation)	<p>The respondent does not agree with the Housing Growth preferred policy option, stating that far less housing should be considered, and no high density or high rise housing supported. the respondent states that Feltham is over populated and its infrastructure cannot cope with any increase in population of Feltham, especially GPs , school spaces and public services. The respondent states that no new housing should be proposed here.</p> <p>The respondent does not agree with the initial proposed capacity for new homes as this is considered far too high for Feltham and more houses is should be built in Hounslow, Brentford and Chiswick.</p> <p>The respondent suggests that there are additional or alternative policies that the Council should consider in relation to Housing Growth, but does not provide any examples in their representation.</p>	Comments noted. The council has identified several site allocations within Feltham to provide an additional school and community floorspace as part of the regeneration of Feltham.
S. Ambrose (Individual)	The respondent agrees with the Housing Growth preferred policy	Comments noted.

<b>WoB1 Housing</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	option and the initial proposed capacity for new homes. The respondent considers that in addition to the sites identified in the Draft Local Plan Review Hanworth park house restoration including housing development should be considered.	
Noyces Funfair (company)	The respondent does not agree with the Housing Growth preferred policy option or the initial proposed capacity for new homes. The respondent considers that in addition to the sites identified in the Draft Local Plan Review the Old railway marshalling yard and Bull Field lower Feltham should be considered. The respondent suggests that there are additional or alternative policies that the Council should consider in relation to Housing Growth, but does not provide any examples in their representation.	Comments noted.
Sport England (Government)	Sport England recommend the Council include an additional objective that confirms the Council will 'seek to provide new facilities for sport and recreation alongside new housing development or make improvements to existing facilities within the catchment of the development' as this will help ensure that the Council meets the Vision and Objections set out in section 3 regarding health and wellbeing. Sport England consider new and improved facilities and environments that encourage sport and physical activity will be required if the residents of new homes are to pursue an active lifestyle, and these facilities should accord with the recommendations set out in the Council's Playing Pitch Strategy and Built Facilities Strategy.	Comment noted. Policy GWC3 Health and Wellbeing and Place policies have been amended to reflect the need to ensure residential development considers the importance of promoting health and wellbeing, including provide infrastructure for formal and informal physical activity, exercise opportunities, recreation and play.

<b>WoB2 Employment Growth</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
Windowflowers Ltd (Company)	Windowflowers Ltd support the Council's desire to secure a strong economic base within this part of the borough, and to maximise the benefits to be achieved through the proposed expansion of Heathrow Airport. Windowflowers Ltd note the Plan should secure the required infrastructure, services, facilities and housing to support the provision of employment growth, and to secure the maximum level of investment. Windowflowers Ltd support the Council's proposed targets	Comment noted. The Council has followed the evidence base in the ELR in identifying and supporting opportunities for industrial intensification of existing employment sites where appropriate. Beyond this, the Council has undertaken a Green Belt Assessment in line with national policy to test options for releasing sites from the Green Belt, and has proposed such releases

WoB2 Employment Growth		
Respondent	Representation Summary	Council Response
	<p>for employment land provision, but ask for confirmation that suitable flexibility has been incorporated into the plan to address potential delays in delivery of some sites, including matters of development viability, ownership issues etc. Windowflowers Ltd state that failure to ensure sufficient alternative locations for growth and development could well result in the Council failing to meet their aspirational growth requirements and failing to maximise the potential benefits to be achieved through the expansion of Heathrow Airport. Windowflowers Ltd do not therefore support the alternative policy options currently put forward for both draft policies WOB1 and WOB2, given the unacceptable focus on the new railway station on the levels of growth to be delivered and the apparent lack of flexibility.</p>	<p>where it considers that exceptional circumstances have been demonstrated. This allows the plan review to deliver a very large proportion of the assessed requirements for additional floorspace for employment floorspace.</p>
D. Bhail (Individual)	<p>The respondent notes new housing allocation at the MOD site and RBS Offices and raises concern around employment provision, stating that the third runaway will provide employment on a temporary basis. The respondent suggests the area would be perfect for a higher education use such as a university, or alternatively the Kempton Water works as a better location. The respondent considers that there needs to be more employment opportunities in and around the centre and it appears there is an unbalance between housing and jobs.</p>	<p>Comments noted. The redevelopment of the MOD site includes office-led mixed-use employment areas. The West of Borough Local Plan review includes sites for employment uses related specifically to Heathrow Airport.</p>
Friends of the River Crane Environment (Charity)	<p>FORCE note that Strategic objective 2 refers only to “benefit[ting] from the commercial opportunities from Heathrow airport...including a wide range of employment spaces and retail uses.” but states this is silent on the opportunities to benefit from the airport by investing in green spaces, eliminating severance and improving walkways and cycleways. FORCE has already set out detailed proposals for improvement opportunities linked to any development at Heathrow (in response to the DfT consultations early in 2017) and formally shares these with the Council as part of this representation. FORCE notes WOB2 anticipates a positive impact of additional residents on the retail offer in Feltham, but claim this fails to acknowledge the likely negative impact of such on the reduced open spaces. FORCE state that the WoBP fails to acknowledge the positive impacts high-quality open spaces, pedestrian and cycle ways can have in attracting residents, visitors, employees and economic</p>	<p>Comments noted. The benefits of high-quality open space are clearly acknowledge in the West of Borough Local Plan and policies set out how these will be improved and access increased. Expectations on developers in relation to open space and environmental improvements are set out clearly within each Place policy of the West of Borough Local Plan.</p>

WoB2 Employment Growth		
Respondent	Representation Summary	Council Response
	<p>activity, and states the Council sets no expectation that development proposals will contribute to maintaining and improving the environment. FORCE has already set out detailed proposals for improvement opportunities linked to Feltham re-development in our response to the Feltham Area proposals earlier in 2017. FORCE rejects the Council's definition of "a few green belt sites that mainly do not meet the purposes of the green belt" as the Plan includes a considerable number of sites proposed for de-designation. FORCE states that these sites are significant in size and they are also significant in function, both environmentally and in their role of demarcating individual communities within the borough. FORCE rejects the policy of using de-designated Green Belt "to help 'close the gap' between demand and supply of industrial land," instead favouring more rigorous prioritisation of brownfield exploitation.</p>	
A2Dominion Developments Limited (Company)	<p>A2Dominion Developments Limited state the NPPF (paragraph 23) requires planning policies to define a network and hierarchy of centres, which is illustrated in the WoBLP for Hounslow West. Paragraph 23 continues that the extent of town centres (i.e. city centres, town centres, district centres and local centres in the context of the NPPF) and primary shopping areas to be defined. This should include the definition of primary and secondary shopping frontages in designated centres. The WoBLP (Figure 5.12) shows that the Retail Frontage of Hounslow West Neighbourhood Centre is proposed to be extended along Vicarage Farm Road and to the North of the A3006/ Bath Road, which is predominately made up of residential homes. A2Dominion Developments Limited consider that these areas should not be included within the Retail Frontage as they are not currently in retail use and request more precision on the exact centre boundaries/retail frontage boundaries is included in the WoBLP to reduce ambiguity in development management terms and results in ineffective plan-making. A2Dominion Developments note the Former Morrisons site remains excluded from the retail frontage, therefore it maintains its edge of centre location, which is supported by the conclusions reached by the Council's independent retail assessment on the planning application.</p>	<p>Comment noted. The extent of the retail frontages at the intersection of Vicarage Farm road and the A3006/Bath Road has been adjusted. The black dashed circles indicate diagrammatically the location of neighbourhood or town centre boundaries. The exact town centre boundaries remain as stated in the 2015 Local Plan.</p>

WoB2 Employment Growth		
Respondent	Representation Summary	Council Response
SEGRO (Company)	<p>SEGRO support proposals to protect and intensify existing employment allocations for a range of uses in accordance with Hounslow Local Plan Policy ED2 and Draft London Plan Policy E7 (Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function) that supports the intensification of business uses through the more efficient use of land / higher plot ratios having regard to operational requirements (including servicing). SEGRO support the protection and intensification of existing employment sites in line with the recommendations of the Hounslow Employment Land Review. noting that existing sites will play an important role in meeting future demand in the Borough. SEGRO consider the existing employment allocations are well placed to serve the Airport and nearby residential areas; both in terms of providing goods and employment opportunities for the local population. SEGRO welcome the Council's intention to monitor losses and gains of industrial land, in line with Paragraph 22 of the NPPF and SEGRO would encourage regular reviews of the Council's evidence base to ensure compensatory provision of employment land is provided in suitable locations to counter any losses. SEGRO support the identification of new employment land as the Hounslow Employment Land Review clearly states that the employment needs of the Borough cannot be met through intensification alone. SEGRO note the 170,000m2 gap referred to in the ELR and the recommendation of allocating two Green Belt sites in light of lack of land elsewhere, namely land at Radius Park (i.e. Airport Business Park) and land to the north west of Clockhouse roundabout to meet demand where it is most needed. SEGRO state that in a third runway scenario, the need is almost doubled, adding 210,000m2, meaning more Green Belt incursions would be required. SEGRO suggest that given the strong demand for logistics / warehousing sites, it is crucial that new sites are sizeable and can accommodate larger units with adequate yard space. SEGRO note that despite demand for large sites, there is a shortage of available land resulting in land values and</p>	<p>Support noted. The development of Heathrow Gateway is dependent on Southern Rail Access to Heathrow Airport and the de-designation of Green Belt in the this area, which is supported by the Council as the main policy option. The Alternative Policy Option is based on Southern Rail Access and Green Belt de-designation not going ahead due to factors outside the control of the Council.</p>

WoB2 Employment Growth		
Respondent	Representation Summary	Council Response
	<p>rents becoming inflated in locations closest to the Airport. SEGRO consider the identification of new sites will alleviate some of these issues and create the preferred conditions for investment. SEGRO support the Council's approach to providing additional Locally Significant Industrial Sites (LSISs) for employment activities, such as Airport Business Park which would meet the definition of LSIS contained in Hounslow Local Plan Policy ED2. SEGRO note the alternative policy option proposes a lower amount of employment floorspace, based on the Southern Rail Access proposal for Heathrow not going ahead and/or the Green Belt Review recommendations not being taken forward, and consider this alternative policy option contrary to the NPPF as it does not reflect the principle of ensuring 'that the planning system does everything it can to support sustainable economic growth' nor does it respond to the core principle under Paragraph 17 reinforced by the Planning Practice Guidance (PPG Paragraph: 003 Reference ID: 12-003-20140306). SEGRO also state the Alternative policy option would miss the opportunity to harness the potential of the Heathrow Opportunity Area, and contradict the place-based ethos of the heart of the Government's emerging Industrial Strategy. SEGRO question the approach in the ELR that suggests 'exporting' demand through the Duty to Cooperate if no land becomes available, and SEGRO state a review of the surrounding local authorities' evidence bases highlights these authorities do not have the capacity to accommodate Hounslow's need for employment land. SEGRO note the imminent Heathrow Economic Needs Assessment will identify a significant requirement for logistics floorspace, regardless of whether the third runway is progressed, which casts doubt on the Duty to Co-operate being a viable option. SEGRO state that if the Council does not provide additional industrial floorspace to meet demand the Borough will lose out to locations elsewhere in the functional economic market area. SEGRO note the stated jobs numbers in the Plan are minimum targets and state</p>	

WoB2 Employment Growth		
Respondent	Representation Summary	Council Response
	<p>that the initial proposed capacity for new jobs is supported on that basis, subject to there being flexibility for this to increase in response to policy changes (e.g. The London Plan) or advancement with the Heathrow Third Runway Proposals. SEGRO note findings of the ELR and potential findings for the the Heathrow Economic Needs Assessment, which the Council should take into consideration as a material consideration, when published. SEGRO note that the Council outlines its intention to prepare Monitoring Reports and monitor Government and London-wide policy as well as changes in legislation to identify any need to review or re-assess the approach taken in the Plan. SEGRO recommend a review mechanism is included for the employment policies within the Plan to reassess the demand for industrial floorspace if the third runway at Heathrow goes ahead. SEGRO state that this review of employment policies should identify industrial and logistics sites that need to come forward to ensure they are available for development as soon as Heathrow Airport has expanded and in response to whichever expansion scenario comes forward, as significant differences in these would result in very different spatial outcomes. SEGRO note the need to be in general conformity the London Plan.</p>	
J. Stewart (Individual)	The respondent considers that the council needs to stop looking to Heathrow for employment and to stop looking to create more and more low paid jobs, and to start looking at how to attract better quality jobs.	Comment noted. The Local Plan review seeks to identify appropriate sites for a wide range of businesses to establish themselves or expand in the borough.
Royal London Asset Management (Company)	Royal London Asset Management (RLAM) note the Local Plan Review sets out how the Council will secure a strong economy in the West of Borough area by creating the conditions for economic growth, particularly around Heathrow Airport and Feltham Town Centre, and the aim to retain all designated industrial sites within the Borough. RLAM consider that the potential of poor quality industrial sites, such the area of Bulls Bridge Industrial Estate in RLAM's ownership, could be optimised through mixed-use redevelopment. RLAM welcome the production of evidence base studies to inform the employment policy	Comments noted. The Employment Land Review (2016) concluded that there is substantial demand for industrial floor space throughout the plan period and the Council is seeking additional LSIS sites. As outlined in WOB2, the Council supports intensification of employment sites. Any proposed release of LSIS land should have regard to the Local Plan (2015) policy ED2 and the London Plan.

WoB2 Employment Growth		
Respondent	Representation Summary	Council Response
	<p>for the West of the Borough, including the Employment Land Review (ELR)2016. RLAM note that each industrial site in the Borough has been assessed as part of the ELR, including Bulls Bridge Industrial Estate, which is described as a “small-scale and poor quality industrial site” with scope for improvements and intensification. RLAM note that the ELR concludes, from an industrial market perspective, there is no justification for releasing industrial sites for other uses, however the ELR also acknowledges that this leaves aside the need for land for other uses, and that the Council might decide that releasing industrial land is justified by needs that have higher priority, such as housing. RLAM have explored future options for their site and consider that a residential-led mixed use scheme would optimise the use of the site, whilst also enabling an element of employment floorspace to be maintained on the site., and request that that the site is identified as an allocation in the emerging Local Plan, and that the current industrial designation is removed for the part of the LSIS in RLAM ownership. RLAM welcome that part e) of the “Optimising Employment Growth” section of the Local Plan Review sets out that the Council will work with affordable and shared workspace managers and providers to bring forward affordable and shared workspace as part of development proposals as these types of employment uses enable employment densities to be increased, and complement residential uses as part of mixed-use schemes.</p>	
Heston Residents' Association (Community organisation)	Heston Residents' Association do not agree with the Employment Growth preferred policy option but do agree with the initial proposed capacity for new jobs.	Comments noted
LB Hounslow Public Health (Government)	LB Hounslow Public Health agree with the Employment Growth preferred policy option.	Support welcomed.
H. Andrews (Individual)	The respondent does not agree with the Employment Growth preferred policy option, stating the when businesses move in to an area they already have their staff. The respondent ask what provision is there that jobs will be for Feltham residents. The respondent notes that on	Comment noted. The Council continues to work with employment services to provide local employment opportunities. The Local Plan seeks to identify further employment land and the approach taken is supported

<b>WoB2 Employment Growth</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	Bedfont Road several established businesses were closed for new warehouses/office space which have been empty for over 18 months now. The respondent questions where the demand for new employment space is coming from.	by the evidence base, namely the Employment Land Review 2016.
London Diocesan Fund (company)	The London Diocesan Fund agrees with the Employment Growth preferred policy option and the initial proposed capacity for new jobs. The London Diocesan Fund suggests there may be additional or alternative policies that the Council should consider in relation to Employment Growth, but does not provide any examples.	Support welcomed
R. Clarke (individual)	The respondent does not agree with the initial proposed capacity for new jobs.	Comment noted.
G. Pollitt (individual)	The respondent agrees with the Employment Growth preferred policy option and the initial proposed capacity for new jobs. The respondent considers that in addition to the employment policies set in the Plan, the Council should consider in the need to look at what further environmental impact the deliveries etc. of these new factories, warehouses will have, especially in terms of increased road traffic, made up of mainly diesel vehicles.	Comment noted. Outlining measures to manage and mitigate transport and environmental impacts from development are addressed in Policies WoB3 and WoB6, and would be set out in further detail in site development requirements.
Boundaries Road Residents Association (Community organisation)	Boundaries Road Residents Association do not agree with the Employment Growth preferred policy option as this is subject to Heathrow Expansion which is opposed by local authority, and state that there will not be many new jobs for at least another 5 -10 years from now. Boundaries Road Residents Association do not agree with the initial proposed capacity for new jobs.	Comment noted. The Employment Growth policies have been prepared according to a scenario without a third runway.
S. Ambrose (Individual)	The respondent agrees with the Employment Growth preferred policy option and the initial proposed capacity for new jobs. The respondent states that the Council should implement measures to boost the night time economy in Feltham town centre as an additional policy in relation to Employment Growth.	Comment noted. Policies set out in the West of Borough Local Plan review support the regeneration of Feltham High Street, with more leisure activities and restaurants, and WoB1 explicitly supports the night time economy in town centres
Noyces Funfair (Company)	The respondent does not agree with the Employment Growth preferred policy option or the initial proposed capacity for new jobs.	Comments noted.

### WoB3 Design and Heritage

Respondent	Representation Summary	Council Response
<p>Be Living (Company)</p>	<p>As outlined in Be Living’s representations to the Great West Corridor Local Plan Review we consider that flexibility should be provided to remove a prescriptive restriction on height, and instead assess each development proposal on a site by site basis.</p> <p>Be Living considers that responsible planning should take into consideration the impact of new development and that new development contributes positively not only to their surroundings, but also the aims and objectives for regeneration of an area. At a high level we agree with the principle of the policy as currently worded, however with the uncertainty regarding housing delivery targets and the ongoing housing shortage, LBH should provide themselves and landowners the flexibility to provide development that meets the needs and requirements of the area. As a result, we consider that sites and development proposals should be assessed on a site by site basis, and where comprehensive townscape analysis has proven that the impacts of a development would be acceptable proposals should be approved, regardless if this is of a different scale to what LBH currently consider acceptable.</p> <p>Be Living considers there to be significant opportunity to increase the number of ‘proposed landmarks’ in the plan area. The West of the Borough is subject to a number of a unique opportunities (proximity to an international transport hub and metropolitan centre) and the opportunity to take advantage of these opportunities should be explored thoroughly.</p> <p>Be Living appreciates that in some locations a ‘landmark building’ would not be appropriate, however it is considered that the current approach is too restrictive to development. Tall, or landmark, buildings and heritage assets do not have to exist independently of one another, and as previously stated, a design of high quality can enhance an area. If a site were to move forward with a proposal that demonstrated the construction of a high quality landmark, this should not be dismissed on the grounds of not being one of the suitable locations outlined on figures 4.6 and 4.7. We also note that contributions received from</p>	<p>Comment Noted. The policy is considered to be a reasonable and justified response to the evidence base and scale of development which has been coming forward, which seeks a comprehensive masterplanned co-ordinated response to managing development rather a scattered approach. Providing a band of acceptable heights is compliant with the draft New London Plan and allows new development to appropriately address its setting and context. The policies are based on current and forecast need, but this does not preclude applicants making exceptional cases, which they will be expected to justify and which we be assessed as would any application.</p> <p>The policy is in line with Policy D2(d) of the Draft New London Plan. The response highlights the confusion that can occur between the terms tall and landmark buildings, which highlights the need for the policy and fails to account for the fact there is limited spaces in the once village settlements of Cranford and Heston. That being said should exceptional landmark buildings come forward on other sites they will be considered on their merits. The argument that larger buildings lead to greater CIL and therefore should be accepted is not an accepted one.</p>

WoB3 Design and Heritage		
Respondent	Representation Summary	Council Response
	<p>viable schemes are vital to delivering public realm improvements, affordable housing alongside any CIL receipts and the benefit to local infrastructure that this delivers. If additional height allows a development to become viable and capable of providing greater contributions then this should be taken into account when determining applications.</p>	
K. Cox (Individual)	<p>In your latest WOB3 'Design and Heritage' - you make very clear reference to the restoration of HPH, as you do in the Feltham Spatial Plan. Please can I ask that you include this restoration in the forthcoming plan before the House falls down and we lose the most iconic heritage asset we have locally.</p>	<p>Comment Noted. The Council has considered the proposed site allocation and has made adjustments where considered appropriate.</p>
Historic England (Non-departmental public body)	<p>While we welcome the broad approach in the consultation draft in relation to the historic environment, we consider that this could be further strengthened through a number of amendments to the text and its objectives. For example, we consider the strategic objective relating to design and heritage on page 37 fails to properly reflect the important and positive relationship between the quality of new design and the historic environment. In order to address this and to be consistent in approach across the borough, we recommend that paragraph 15 of page 35 of the corresponding consultation on the Great West Plan is added to the text. We note the statement at paragraph 1.19 that the Plan 'is based on an extensive evidence base'. However, we are concerned that there is a lack of reference to an adequate evidence base in relation to the historic environment (NPPF paragraphs 158 and 169) across the rest of the document. This is somewhat surprising given the relatively recent preparation of an Urban Context and Character Study mentioned at paragraph 2.29, and the policies and supporting text within the Hounslow Local Plan. We understand that this has based on extensive work to understand the history, nature and character of the Borough's development and existing built and historic environment. It is not clear how this work has informed the consultation draft, and we strongly recommend that the links between these pieces of work are made clear in the next iteration of the Plan.</p>	<p>Agreed. Policy WoB5 has been amended and refined to better reflect the important and positive relationship between design quality and the historic environment. Comment Noted re evidence base for historic environment. The Council considers that the evidence base has been sufficiently referred to in the text. Clause Q- Principle of Amendment agreed. Para 4.23- agreed. Comment noted re. briefs.</p>

WoB3 Design and Heritage		
Respondent	Representation Summary	Council Response
	<p>We note and support the broad aims Borough Council’s approach set out on page 55 in relation to design and heritage (clauses f to k). However, as drafted we are concerned that clause q appears to overlook types of heritage assets other than listed buildings. We recommend that this is amended to read q) ‘Conserve and enhance the historic environment and avoid harming the significance of designated and non-designated heritage assets, unless it can be demonstrated ....’We would welcome greater clarity around the intentions for tall buildings in Feltham town centre. Paragraph 4.23 references the Hounslow Local Plan’s identification of the town centre as a suitable location, but the adjacent conservation area and the related Feltham Place Policy (which we support) should be included in the text to avoid ambiguity around potential heights. We would also refer you to our response on the Feltham Masterplan Consultation in March this year (copy attached elsewhere to this letter).</p> <p>We note the identification of relevant heritage assets in relation to the site allocations at appendix 1. We would stress the need for an understanding of the significance of each of these assets (and the likely impact on them by new development) to be considered when moving from indicative capacities to detailed development briefs.</p>	
M. Franke (Individual)	I am a local resident and am in full support of Hanworth Park House restoration, I feel this will be beneficial to the area and it’s what it needs	Support noted.
Friends of the River Crane Environment (Charity)	<p>WOB3 Design and Heritage            FORCE does not accept that “The West of Borough area is characterised by...low value open land.” (p54) The increased population and business activity anticipated in the WoBP will increase the scarcity value of such open land as remains after development. FORCE would have welcomed far more detail than the WoBP provides to support its statement, “Sites which have been identified for potential development...offer opportunities to create new public spaces.” (p59)</p> <p>FORCE supports the WoBP’s proposals for “improvements to the open</p>	Comment noted. The description of open land has been amended to clarify. The description was intended to identify that the open land referred to does not serve a recreational purpose per se but rather is part of the undeveloped greenbelt land and some of which is identified in the Council's Greenbelt Review and is not fulfilling the objective of the Greenbelt. WOB is characterised by a significant amount of low value greenbelt land.

WoB3 Design and Heritage		
Respondent	Representation Summary	Council Response
	<p>spaces and the public realm.” (p55) However, FORCE believes that investment in such improvements should not be confined to “historic and heritage buildings,” but should be undertaken for all of the previously identified “low value open land,” for which it would certainly achieve an increase in amenity value. The proposals for Rectory Farm elsewhere in the Borough provide a model: here, hitherto “low value open land” will, if LBH’s planning conditions are fulfilled, deliver a brand new, high quality urban park. Such investment should meet “the highest standards of design and placemaking” for the open spaces, every bit as much as for proposed developments.</p> <p>FORCE supports the provision of “well-designed and generous pavements” (p55) for walkers, and would also seek such considered provision for cyclists making use of inter-connecting networks between open spaces, including off-road provision where possible.</p>	
Sport England (Non-departmental public body)	Sport England recommends that the Council requires planning applications for new housing developments to demonstrate how their proposals accord with the 10 principles set out in Sport England’s Active Design document. This will help deliver Aims 6 (design), 11 and 12 (Health & Wellbeing) of the Council’s Vision and Objectives (set out in Chapter 3). See Model Policy page 53 of our Active Design guide	Comment Noted
Royal London Asset Management (Company)	We agree that a high quality of design is required for all developments, as it is an integral part of ensuring the delivery of sustainable development, as set out in the NPPF (Chapter 7). The criteria set out in the “Design and Heritage” section has sought to address those points listed in Paragraph 58 of the NPPF and, therefore, is in accordance with the national guidance. We welcome the approach set out by the Council in relation to design and heritage, which provides sufficient flexibility for the design of development to be guided through individual circumstances rather than being dictated by strict policy requirements, and confirms that the design criteria set out will only be considered where material to an application. This is in accordance with Paragraph 59 of the NPPF, which states that design policies should avoid unnecessary prescription or detail and should	Support Noted

<b>WoB3 Design and Heritage</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	concentrate on “guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development”. As such, we consider this to be a ‘sound’ approach.	
AGC Property Limited (Company)	Hanworth Park House restoration is of course subject to appropriate design. We endorse the recommendation of Policy P1 which seek that any new development will have to be sensitively designed so as to not have an adverse impact on the heritage assets, through the use- either in whole or in part- of the heritage led regeneration. Having regard to the above, we fully endorse proposed policy WOB3 (j) which promotes the re-use of vacant or underused heritage assets and settings, including Hanworth Park House.	Support Noted
Heston Residents' Association (Community group)	The respondent does not agree with the Design and Heritage preferred policy option. The respondent suggests there are additional or alternative policies that the Council should consider in relation to Design and Heritage but does not specify what these should be.	Comment noted.
H. Andrews (Individual)	The respondent agrees with the Design and Heritage preferred policy option, including policy options which aims to prevent new development from over dominating its surroundings or being out of context and the preferred policy option for landmark buildings.	Support welcomed
London Diocesan Fund (Company)	The respondent agrees with the Design and Heritage preferred policy option, including policy options which aims to prevent new development from over dominating its surroundings or being out of context and the preferred policy option for landmark buildings. The respondent suggests there are additional or alternative policies that the Council should consider in relation to Design and Heritage but does not specify what these should be.	Support welcomed
R. Clarke (Company)	I agree with these policies, but think they will be challenging to achieve, and are not consistent with your wider approach. More consideration needs to be made about how to ensure that these important assets inform the design of the overall approach - e.g. Hanworth Park House is vital to understanding the development of Feltham and the MOD site, yet this planning framework does very little to make sense of this. Equally Kempton Steam Museum is stuck out in the corner of the Borough, and very little work has been done about how to make sense	Comment noted. This information would be expected in planning briefs. The indicative scale of development is based on a justified and reasonable approach arising from the evidence base. The Feltham Place Policy seeks to protect local character and identify suitable locations for landmark buildings as well as identify important view corridors for protection. The Design and Heritage Policy WoB5 has been amended to clarify a common

WoB3 Design and Heritage		
Respondent	Representation Summary	Council Response
	<p>of it, Hanworth and Hampton.</p> <p>This is vital for the area around the station - some of the proposed new buildings will have to be reduced in scale to be more appropriate, and in keeping with the 'village character'.</p> <p>I have concerns about creating new Landmark buildings that may compete with existing ones - e.g Hanworth Parish Church, which should be listed, as well as the impacts on listed buildings - such as Feltham Station, and the views behind Bridge House Pond. Locating a landmark building near Hanworth Park may also not be suitable. The views from Feltham Park of St Catherine's tower should also be protected, and so it may not be appropriate to have a tall building in this location. The area is a conservation area, with village charm, so this needs to be considered.</p> <p>There is an urgent need to recognise 20th Century heritage including industrial heritage - e.g. MOD works, Aston Martin Factory, Marshalling Yards, Hanworth Air Park, air raid shelters, as well as other civic buildings such as the Magistrates Court. There is currently no museum that recognises this, and the Council should support Heritage Lottery bids that recognise this, as well as heritage trails. All new buildings should be designed to reference this character where appropriate (e.g. the MOD site), or any developments around the station which need to recognise the village character of the area.</p>	<p>misconception that landmark quality equates to height. In addition to height. landmark quality can be achieved through numerous features including building style, materials, design and window patterns, vertical or horizontal articulation amongst others. The policy wording has been amended to acknowledge this and incorporate reference to this important and contributing character to the area.</p>
G. Pollitt (Individual)	<p>The respondent agrees with the Design and Heritage preferred policy option but states that tall buildings can increase pollution by not allowing the wind to fully disperse it. The respondent also states that an additional or alternative policy that the Council should consider in relation to Design and Heritage should be to ensure that all of Felthams heritage is preserved and not demolished to make way for new development.</p>	<p>Comments Noted. Microclimate and associated issues are tested and explored during the planning application process. Policy WoB5 and Place policy P1 requires development to conserve, restore and enhance designated and non-designated heritage assets, and respect local context and character.</p>
Boundaries Road Residents Association (Community	<p>The respondent does not agree with the Design and Heritage preferred policy option and suggests the approach taken should include high</p>	<p>Comment noted. The approach to design is considered to be a balanced one - balancing housing and</p>

WoB3 Design and Heritage		
Respondent	Representation Summary	Council Response
organisation)	density, high rise housing and no land fill building. Besides this, the respondent does agree with policy which aims to prevent new development from over dominating its surroundings or being out of context but does not agree with the preferred policy option for landmark buildings.	employment need against heritage and neighbours' living conditions. By building taller across the area and on new sites the harm to heritage and neighbours would be considered undesirable.
T. Howe (Individual)	<p>The policies and proposals are generally fine: however, there should be a focus on establishing significance at the start of the process, and this is missing. The council should commit to having full Conservation Area Appraisals (CAA) completed for every conservation area in the borough, and establishing a list of Borough Heritage Assets, and this should be set out as a firm undertaking at the start of the "Our Approach" section. Only once this baseline data is in place can the rest of the proposed policies be implemented appropriately. I am a resident of the St. Dunstan's Conservation Area, which currently has no CAA: There is no information available about why the area was designated, what is considered significant, how the area should be managed and cared for going forward, and what sort of development is "appropriate". It won't be possible to determine the value and significance of any Heritage Assets in this area, or evaluate the impact of new development upon them, or, crucially, establish whether or not the Council's preferred options for design and heritage management are the correct ones, without this information. I'm disappointed to note that despite clearly being disjointed, incoherent and comparatively run-down, the St. Dunstan's CA is virtually absent from this document entirely. There is an opportunity in this document in the section "Feltham Neighbourhoods" to highlight the significance of the area as the historic core of Feltham/ the original "Feltham Village", focus on small-scale regeneration projects, promote better and more sensitive planning and tidy the area up, but the area hasn't been included or addressed at all and the opportunity is likely to be missed.</p> <p>The section on "implementation" sets out the way that the council will engage with developers. It should be noted/stressed that engagement with Householder Developers will be presumably be different - for</p>	Comment noted. The Council is committed to reappraising all current conservation areas and will reference this in the policy. The St Dunstan's CAA has been submitted for public consultation during Summer 2018. The section has been amended to include engagement with developers and householders in pre - application discussions. Comment noted re Para 2. The Council has clarified the wording of this section.

<b>WoB3 Design and Heritage</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	example: the Greater London Archaeological Advisory Service no longer requires archaeological assessment on certain types/sizes of development, and householder applications, even within designated areas. Paragraph 2 (p.57) should explain and make more explicit where such exclusions might apply.	
S. Ambrose (Individual)	The respondent does not agree with the Design and Heritage preferred policy option and suggests that more focus should be placed upon restoring Hanworth Park house. The respondent agrees with the preferred policy option which aims to prevent new development from over dominating its surroundings or being out of context and the preferred policy option for landmark buildings. The respondent recommends an additional policy the Council should consider in relation to Design and Heritage around preserving what little of the areas historical heritage remains.	Comment noted. The Council has considered the proposed site allocation and has made adjustments where considered appropriate. The Council will support proposals that lead to the sensitive refurbishment of Hanworth Park House.
Noyces Funfair (Company)	The respondent agrees with the Design and Heritage preferred policy option, and the preferred policy options which aims to prevent new development from over dominating its surroundings or being out of context and for landmark buildings. The respondent suggests there are additional or alternative policies that the Council should consider but does not suggest what these might be.	Comment noted

<b>WoB4 Green-Belt, Metropolitan Open Land and Open Space</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
Canal and Rivers Trust (Non-profit organisation)	Canal and Rivers Trust note the Local Plan policies should consider the opportunities for links for walking and cycling between residential areas and key employment areas in Hounslow and Southall, and access to/connecting green/blue space in this area (e.g. Southall Recreation Ground, Bixley Recreation Ground, Norwood Green, Glade Lane Canalside Park, Osterley Park, and to green spaces further west and north along the GUC and Paddington Arm), in particular around access points such as Norwood Road, Regina Road and Hayes Road/Western Road.	Comment noted. Policy WoB4 commits the Council to improving the quality and range of open space functions in the West of Borough, including improving links between parks and river corridors. The Green Belt Assessment has recommended areas for Metropolitan Open Land status, including key parcels along the Crane Corridor, and identifies a strategy for conserving, enhancing and restoring the land so that its use for activities such as walking and cycling can be encouraged.

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	Canal and Rivers Trust state there is no reference to the Grand Union Canal in this section and this local asset doesn't feature on the accompanying plan. We would suggest an acknowledgement that Hounslow residents and visitors have access to the canal even if it lies slightly outside of the borough boundary.	
Greater London Authority (Government)	The GLA state that the current and draft London Plans state that the loss or de-designation of Green Belt will be not be supported. The Mayor welcomes the continued protection of many Green Belt sites through their proposed re-designation as Metropolitan Open Land (MOL), however he is concerned about the rationale for the de-designation of the Green Belt sites and the rationale as to why some sites have been re-designated as MOL and others not. The GLA state that only where there has been significant development in the Green Belt should the boundary be altered. The Mayor objects to the de-designation of the GB and considers that NPPF does not require local planning authorities to carry out a Green Belt review.	Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. Regarding MOL status, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL.
The Isleworth Society (Community organisation)	<p>The Isleworth Society note that the key proposal to remove green belt protection from over 100 hectares of Open Space with the downstream purpose of large scale development linked to Heathrow Expansion is contrary to both Government and GLA policy in addition to that of the Council. The Isleworth Society consider this approach to be significantly flawed, reaches erroneous conclusions and is different from the 2013 policy with no justifiable reasons given for reviewing the green belt. The Isleworth Society consider that the assessments ignore the function of supporting Feltham and Ashford and state there is no evidence that derelict and other urban land has been assessed.</p> <p>The Isleworth Society consider the proposal conflicts with those of the Mayor of London's Green Belt Land, and state that the draft London</p>	Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>Plan includes guidelines for increasing green infrastructure, including a framework to help boroughs and developers determine how much should be required in new developments, making it clear green infrastructure must not be an “add-on”.</p>	<p>in some cases. In arriving at these conclusions, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. The Council agrees with the need for improvements in the extent and quality of green infrastructure. Where land is released from the Green Belt for development, site development requirements will stipulate key areas for retention as open space, and where land is being re-designated as MOL, the Green Belt Assessment has identified a strategy for restoration, enhancement and conservation of each parcel.</p>
<p>Friends of Northcote Nature Reserve (Community Organisation)</p>	<p>Friends of Northcote Nature Reserve (FoNNR) object to the allocation for development of over 100 hectares of Hounslow Green Belt, stating that this is in direct contradiction to the Mayor’s stated policy to protect Green Belt, and would hamper the Mayor's target to make 50% of London green.</p> <p>FoNNR also object to the redesignation of huge areas of Green Belt to Metropolitan Open Land as this not only ignores their virtue in preventing urban sprawl, but makes them far more vulnerable to sale or development. FoNNR state that their experience with the Northcote Nature Reserve, suggests that a trigger event (in this case enclosure) meant that after 12 months the space would automatically lose its protection as MOL unless it was challenged by the local community (in this case via the mechanism of the Village Green application). FoNNR are aware from this process that it takes determined and organised communities to organise this type of challenge.</p>	<p>Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. In arriving at these conclusions, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise,</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		<p>which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL.</p>
<p>West Chiswick and Gunnersbury Society (Community organisation)</p>	<p>West Chiswick and Gunnersbury Society object strongly to the proposals to de-designate large areas of Green Belt (9% of total in the WOB) for development purposes linked mainly to the expansion of Heathrow airport. West Chiswick and Gunnersbury Society state that as the projected population increases, together with the poor health and lack of physical activity of the residents in this area highlighted in the document, suggest that this is a misguided and dangerous approach to take. West Chiswick and Gunnersbury Society note this is incompatible with the relevant policies of the NPPF, the London Plan and the Local Plan and request that the "Alternative Policy Option" is chosen.</p>	<p>Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. In arriving at these conclusions, the Council has carried out an extremely thorough and</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area.
Windowflowers Ltd (Company)	<p>Windowflowers Ltd remain of the view that their site is justified for release from the Green Belt in its entirety, as part of a residential led 'mixed use' allocation., as the release of this site would not undermine the purposes of the Green Belt and would have no greater impact on the wider local environment than other sites brought forward for development.</p> <p>Windowflowers Ltd remain of the view that the site could be developed in its entirety for a residential led 'mixed use' scheme and maximize the development opportunities in this part of the borough and not result in an increase in the overall portion of Green Belt to be lost, given its very limited size. Windowflowers Ltd state the site is well placed for benefitting from the wider infrastructure improvements proposed in the local area, and will not undermine the wider Green Belt and environment.</p> <p>Windowflowers Ltd would not support the alternative policy option being presented by the Council as this would not represent best practice and will not assist in meeting the development needs of this</p>	Comment noted. The Green Belt Assessment has not recommended this site for further consideration and the Council considers that exceptional circumstances have not been demonstrated for releasing this land from the Green Belt.

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	part of the borough. Windowflowers Ltd consider that the alternative policy approach in this instance should in fact be a review of smaller parcels of Green Belt land within the Plan area for release, in addition to simply relying on some of the larger tracts of land proposed to be reallocated.	
D. Bhail (Individual)	The respondent thanks the Council for not taking Fortescue House, Park Road Hanworth TW13 6PN and surrounding land out of the green belt in the draft plan. The respondent notes that MOL has effectively the same protection and states that this has been a major concern and obstacle for a longer lease for the school as it simply couldn't continue if the land on either side of our driveway was developed.	Comment noted. Policy in the existing and new versions of the London plan is clear that MOL enjoys the same status of protection as Green Belt land.
Campaign to Protect Rural England (Non-profit organisation)	<p>Campaign to Protect Rural England (CPRE) strongly object to proposals to allocate 110 hectares (1,100,000sqm) of green space the majority of which (101 hectares) is Green Belt, for development, in direct contradiction to London Plan policy, and state that all of these parcels of land continue to fulfil Green Belt purposes.</p> <p>CPRE strongly object to proposals to re-designate large sections of Green Belt to Metropolitan Open Land because these parcels of land continue to perform key Green Belt functions. CPRE consider these sites should not be re-designated and should remain as Green Belt as this ignores the roles of these sites in checking unrestricted sprawl (NPPF purpose 1) and preventing neighbouring towns merging (NPPF purpose 2).</p> <p>CPRE consider that the 2017 Green Belt review is significantly flawed and reaches erroneous conclusions: completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews, as the 2013 Green Belt Review found that most sites fulfilled at Green Belt purposes however the 2017 Green Belt review found most sites do not clearly fulfil Green Belt purposes; the council gives inappropriate reasons for conducting Green Belt review not backed up with any specific evidence about why a Green Belt Review is needed; the 2017 Green Belt Review and the council's assessments repeatedly ignore the function of</p>	Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>separating the distinct towns of e.g. Feltham and Ashford and the review only mentions the “separation between the edge of London and settlements in Spelthorne (Surrey) rather than Green Belt which serves to stop suburban towns from merging, whilst the second purpose is also dismissed without good reason; the council appears, inappropriately, to be questioning NPPF Green Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan, making as it does inappropriate statements indicating that the national policy might be under review, when it is not, which is inappropriate in the context of a review which should be objective and evidence-based.</p> <p>CPRE state that they can find no evidence the council has adequately assessed the amount of ‘derelict and other urban land’ which could be ‘recycled’ (i.e. in relation to Green Belt Purpose 5) and have submitted a list of such sites with their representation.</p> <p>CPRE consider The Stage 1 Green Belt Review disregarded purpose 5 on the basis that “purpose 5 applies to all sites.” and state this is a major concern given that this is one of the most important purposes and at a minimum, an assessment should be made of whether, if a site was removed, it would serve to enhance development pressures. CPRE note a footnote stating Purpose 5 therefore remains relevant in that all parcels serve it, but the need for land requires other factors to come into play. Purpose 5 should therefore be excluded.” CPRE consider this statement only holds if an assessment of land availability has been properly made.</p> <p>CPRE state that Sustainable Development has not been adequately assessed as this must take into account the harm and must consider whether the benefits outweigh the harm, however no discussion is made in any detail of the harms which would be caused generally or by developing individual sites. CPRE note that Green Belt provides a series of important environmental functions – most notably preventing urban sprawl and associated car-dependency, traffic and air pollution, and</p>	<p>the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>many of the sites allocated for development are also alongside or close to rivers and/or contain SINCs, providing important green infrastructure for water and air quality management and wildlife habitat.</p> <p>CPRE consider arguments and evidence for 'exceptional circumstances' to be very weak and claim this was not examined in the adopted Local Plan and the West of Borough Plan provides that opportunity. CPRE state there are a number of reasons we cannot accept that exceptional circumstances exist: (a) General pressures for housing or commercial space cannot be said to constitute exceptional circumstances, applying as they do to all of London; (b) exceptional circumstances should be assessed on a site by site, not a generalised, basis; (c) alternative, previously-developed sites have not been adequately assessed, which is dependent on an assessment of supply generally, not just within Green Belt, meaning the council must demonstrate with evidence that it has considered all potential alternative sites, intensification of existing industrial estates, surface car parks etc.</p> <p>CPRE state that site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency. CPRE state It would be helpful if all major sites could appear in the Site Allocations, given unique reference numbers, and referenced within the main body of the Local Plan document.</p> <p>CPRE object to the inclusion of Green Belt sites for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period. CPRE note Housing Need is assessed at 1898 - double the current build rate - which has averaged 1042 units over the past 14 years and in more recent years this average has come down. CPRE accept that build rates need to improve, but object to Green Belt land being included in allocations when land is being allocated in considerable excess to what is actually likely to be realistically needed. CPRE consider this represents poor planning, means that Green Belt sites may be developed before brownfield or</p>	<p>characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	other previously-developed sites which de facto means that Green Belt Purpose 5 is being ignored.	
B. S. Dhillon (Individual)	<p>The respondent strongly objects to proposals to allocate 110 hectares (1,100,000sqm) of green space the majority of which (101 hectares) is Green Belt, for development, in direct contradiction to London Plan policy, because these parcels of land all continue to fulfil Green Belt purposes.</p> <p>The respondent strongly object to proposals to re-designate large sections of Green Belt to Metropolitan Open Land because these parcels of land continue to perform key Green Belt functions in holding back urban sprawl and stopping towns from merging, therefore these sites should remain as Green Belt.</p> <p>The respondent notes experience with the reassignment of MOL to allow planning approval Nishkam School abundantly demonstrates that reallocation and ensuing consequences e.g. traffic overload, loss of outlook, ruining the nature of a locale etc are ill thought through by the LB Hounslow.</p> <p>The respondent states that the council's 2017 Green Belt review is significantly flawed and reaches erroneous conclusions: completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews; the council gives inappropriate reasons for conducting Green Belt review; the 2017 Green Belt Review and the council's assessments repeatedly ignore the function of separating the distinct towns of e.g. Feltham and Ashford; and the council appears, inappropriately, to be questioning NPPF Green Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan.</p> <p>The respondent state that there is no evidence that the council has adequately assessed the amount of 'derelict and other urban land' which could be 'recycled' in relation to Green Belt Purpose 5, and notes there are clear alternatives to building on Green Belt including</p>	<p>Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and regenerating town centres further away from the airport noise and pollution.</p> <p>The respondent considers that Sustainable Development has not been adequately assessed, and any assessment must weigh benefits against the significant harm caused by building on Green Belt.</p> <p>The respondent states that arguments and evidence for 'exceptional circumstances' are very weak and exceptional circumstances do not exist, and states site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency.</p>	<p>with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.</p>
Hanwell Community Forum (Community organisation)	The respondent states the Plan is further evidence that the Council has zero respect for the environment, green space and its role in improving and maintaining adequate air quality. The respondent strongly object	Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>to proposals to allocate 110 hectares (1,100,000sqm) of green space the majority of which (101 hectares) is Green Belt, for development, in direct contradiction to London Plan policy, because these parcels of land all continue to fulfil Green Belt purposes, and strongly object to proposals to re-designate large sections of Green Belt to Metropolitan Open Land because these parcels of land continue to perform key Green Belt functions in holding back urban sprawl and stopping towns from merging. These sites should not be re- designated and should remain as Green Belt.</p> <p>The respondent states Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt. The respondent states that arguments and evidence for 'exceptional circumstances' are very weak and exceptional circumstances do not exist. The respondent states Green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period.</p> <p>The respondent states that the council's 2017 Green Belt review is significantly flawed and reaches erroneous conclusions: completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews; the council gives inappropriate reasons for conducting Green Belt review; the 2017 Green Belt Review and the council's assessments repeatedly ignore the function of separating the distinct towns of e.g. Feltham and Ashford; and the council appears, inappropriately, to be questioning NPPF Green Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan.</p> <p>The respondent state that there is no evidence that the council has adequately assessed the amount of 'derelict and other urban land' which could be 'recycled' in relation to Green Belt Purpose 5, and notes</p>	<p>reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>there are clear alternatives to building on Green Belt including intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and regenerating town centres further away from the airport noise and pollution.</p>	<p>designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.</p>
C. Sabucci (Individual)	<p>The respondent objects to proposals to allocate 110 hectares (1,100,000sqm) of green space the majority of which (101 hectares) is Green Belt, for development, in direct contradiction to London Plan policy, because these parcels of land all continue to fulfil Green Belt purposes, and strongly object to proposals to re-designate large sections of Green Belt to Metropolitan Open Land because these parcels of land continue to perform key Green Belt functions in holding back urban sprawl and stopping towns from merging, and should</p>	<p>Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>remain as Green Belt.</p> <p>The respondent states arguments and evidence for 'exceptional circumstances' are very weak and exceptional circumstances do not exist and Green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period. The respondent states Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt.</p>	<p>exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.
S. Lofthouse (Individual)	<p>The respondent states that they strongly against the proposals to allocate 110 hect. of green space, 90% of which is Green Belt. This goes against the London Plan policy since these parcels of land all continue to fulfil Green Belt purposes.</p> <p>The respondent is against proposals to take large sections of Green Belt and redesignate them as Metropolitan Open Land, not least because these parcels of land continue to sustain Green Belt functions by holding back urban sprawl, and preventing towns from merging, therefore such sites should remain as Green Belt.</p> <p>The respondent state Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt, arguments and</p>	Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>evidence for 'exceptional circumstances' are very weak and exceptional circumstances do not exist, green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period.</p>	<p>in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		<p>status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.</p>
J. Leach (Individual)	<p>The respondent states that Green Belt review of 2017 is significantly flawed and reaches erroneous conclusions: completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews; the council gives inappropriate reasons for conducting Green Belt review; the 2017 Green Belt Review and the council's assessments repeatedly ignore the function of separating the distinct towns of e.g. Feltham and Ashford; the council appears, inappropriately, to be questioning NPPF Green Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan.</p> <p>The respondent states it is obvious that the Council has not adequately assessed the amount of 'derelict and other urban land' which could be 'recycled' in relation to Green Belt Purpose 5. There are clear alternatives to building on Green Belt including intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and regenerating town centres further away from the airport noise and pollution.</p>	<p>Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>The respondent is strongly against the proposals to allocate 110 hect. of green space, 90% of which is Green Belt, which goes against the London Plan policy since these parcels of land all continue to fulfil Green Belt purposes, and is against proposals to take large sections of Green Belt and redesignate them as Metropolitan Open Land, as these parcels of land continue to sustain Green Belt functions by holding back urban sprawl, and preventing towns from merging. The respondent states Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt, arguments and evidence for 'exceptional circumstances' are very weak and exceptional circumstances do not exist, and green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period.</p>	<p>extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.
North Cray Residents Association (Community organisation)	North Cray Residents Association (NCRA) state they are a residents association outside LBH, but are concerned about any threat to London's Green Belt. NCRA state any such development is contrary to people's expectation that urban sprawl should be avoided, especially in areas where it would certainly lead to an increase in traffic and air pollution. NCRA state that, in Bexley the Local Plan is taking account of this and of the very real need to preserve and protect our open green spaces from development especially where there are alternatives such as using brownfield land instead of encroaching on the Green Belt and thereby reducing valuable opportunities for leisure pursuits, which are so very important for the wellbeing of all Londoners. NCRA ask LBH to respect this part of London's Green belt and do not allow any such development in Hounslow.	Comment noted, although the role of the local plan is to balance the critical importance of meeting development requirements with the maintaining the crucial role which designations such as Green Belt play. In Hounslow's case, the borough's unique economic context gives rise to very substantial requirements for employment land which our evidence base has found will not be able to be met outside the Green Belt. Failing to deliver this development requirement would be likely to have serious adverse consequences for the Hounslow economy, and therefore the local plan has this very important balancing act to play. Hounslow Council agrees with the critical importance of green space and, where land is released for development, the plan is setting key development requirements including the maintenance of significant tracts of land for open space. In cases where land is being re-designated for MOL, a strategy is being identified for restoring, enhancing and conserving the land. A new revised Green Belt boundary will ensure that the land remaining in the Green Belt is protected by a robust, permanent designation which will ensure its preservation and the Council will seek to improve its accessibility for Londoners for recreation.

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
S. Williams (Individual)	<p>The respondent states that Green Belt review of 2017 is significantly flawed and reaches erroneous conclusions: completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews; the council gives inappropriate reasons for conducting Green Belt review; the 2017 Green Belt Review and the council's assessments repeatedly ignore the function of separating the distinct towns of e.g. Feltham and Ashford; the council appears, inappropriately, to be questioning NPPF Green Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan.</p> <p>The respondent states it is obvious that the Council has not adequately assessed the amount of 'derelict and other urban land' which could be 'recycled' in relation to Green Belt Purpose 5. There are clear alternatives to building on Green Belt including intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and regenerating town centres further away from the airport noise and pollution.</p> <p>The respondent is strongly against the proposals to allocate 110 hect. of green space, 90% of which is Green Belt, which goes against the London Plan policy since these parcels of land all continue to fulfil Green Belt purposes, and is against proposals to take large sections of Green Belt and redesignate them as Metropolitan Open Land, as these parcels of land continue to sustain Green Belt functions by holding back urban sprawl, and preventing towns from merging. The respondent states Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt, arguments and evidence for 'exceptional circumstances' are very weak and exceptional circumstances do not exist, and green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period.</p>	<p>Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		<p>requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.</p>
TBR Preservation Society (Community organisation)	TBR Preservation Society (TBRPS) states that Green Belt review of 2017 is significantly flawed and reaches erroneous conclusions: completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews; the council gives inappropriate reasons for conducting Green Belt review; the 2017 Green Belt Review and the	Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>council's assessments repeatedly ignore the function of separating the distinct towns of e.g. Feltham and Ashford; the council appears, inappropriately, to be questioning NPPF Green Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan.</p> <p>TBRPS states it is obvious that the Council has not adequately assessed the amount of 'derelict and other urban land' which could be 'recycled' in relation to Green Belt Purpose 5. There are clear alternatives to building on Green Belt including intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and regenerating town centres further away from the airport noise and pollution.</p> <p>TBRPS is strongly against the proposals to allocate 110 hect. of green space, 90% of which is Green Belt, which goes against the London Plan policy since these parcels of land all continue to fulfil Green Belt purposes, and is against proposals to take large sections of Green Belt and redesignate them as Metropolitan Open Land, as these parcels of land continue to sustain Green Belt functions by holding back urban sprawl, and preventing towns from merging. The respondent states Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt, arguments and evidence for 'exceptional circumstances' are very weak and exceptional circumstances do not exist, and green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period.</p>	<p>shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		<p>centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.</p>
D. Wetzal (Individual)	<p>The respondent states that Green Belt review of 2017 is significantly flawed and reaches erroneous conclusions: completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews; the council gives inappropriate reasons for conducting Green Belt review; the 2017 Green Belt Review and the council's assessments repeatedly ignore the function of separating the distinct towns of e.g. Feltham and Ashford; the council appears, inappropriately, to be questioning NPPF Green Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan.</p>	<p>Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		<p>capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.
C. Fisk (Individual)	<p>The respondent states that Green Belt review of 2017 is significantly flawed and reaches erroneous conclusions: completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews; the council gives inappropriate reasons for conducting Green Belt review; the 2017 Green Belt Review and the council's assessments repeatedly ignore the function of separating the distinct towns of e.g. Feltham and Ashford; the council appears, inappropriately, to be questioning NPPF Green Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan.</p> <p>The respondent states it is obvious that the Council has not adequately assessed the amount of 'derelict and other urban land' which could be 'recycled' in relation to Green Belt Purpose 5. There are clear alternatives to building on Green Belt including intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and</p>	Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>regenerating town centres further away from the airport noise and pollution.</p> <p>The respondent is strongly against the proposals to allocate 110 hect. of green space, 90% of which is Green Belt, which goes against the London Plan policy since these parcels of land all continue to fulfil Green Belt purposes, and is against proposals to take large sections of Green Belt and redesignate them as Metropolitan Open Land, as these parcels of land continue to sustain Green Belt functions by holding back urban sprawl, and preventing towns from merging. The respondent states Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt, arguments and evidence for 'exceptional circumstances' are very weak and exceptional circumstances do not exist, and green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period.</p>	<p>intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.
R. Mckinney (Individual)	The respondent states it is obvious that the Council has not adequately assessed the amount of 'derelict and other urban land' which could be 'recycled' in relation to Green Belt Purpose 5 as there are clear alternatives to building on Green Belt including intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and regenerating town centres further away from the airport noise and pollution.	Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		<p>Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.
V. Suckling (Individual)	<p>The respondent states that Green Belt review of 2017 is significantly flawed and reaches erroneous conclusions: completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews; the council gives inappropriate reasons for conducting Green Belt review; the 2017 Green Belt Review and the council's assessments repeatedly ignore the function of separating the distinct towns of e.g. Feltham and Ashford; the council appears, inappropriately, to be questioning NPPF Green Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan.</p> <p>The respondent states it is obvious that the Council has not adequately assessed the amount of 'derelict and other urban land' which could be 'recycled' in relation to Green Belt Purpose 5. There are clear alternatives to building on Green Belt including intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and regenerating town centres further away from the airport noise and pollution.</p> <p>The respondent is strongly against the proposals to allocate 110 hect. of green space, 90% of which is Green Belt, which goes against the London Plan policy since these parcels of land all continue to fulfil Green Belt purposes, and is against proposals to take large sections of Green Belt and re-designate them as Metropolitan Open Land, as these parcels of land continue to sustain Green Belt functions by holding back urban sprawl, and preventing towns from merging. The respondent states</p>	<p>Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt, arguments and evidence for 'exceptional circumstances' are very weak and exceptional circumstances do not exist, and green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period.</p>	<p>not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.
Friends of the River Crane Environment (Community organisation)	<p>FORCE note Heathrow Airport Limited, in expansion plans, identified the potential to create new and enhanced public green spaces around the airport that would be four times the size of Hyde Park, but consider the open spaces to the south and east of the airport should be improved whether or not Heathrow expands, and that development provides a key to unlock these improvements.</p> <p>FORCE note WoBP emphasises de-designation of Green Belt to enable development, with passive surveillance of residual open space and fragmented new open spaces, and consider the Plan regards the poor quality of the existing open spaces as a justification for building on them. Force state The WoBP does not at present make the most of the opportunity to improve and better link these open spaces together as a lasting enhanced green infrastructure asset for the borough, and will reduce the open spaces available to already deprived residents, reducing connectivity between open spaces, and the value of the corridor as a whole.</p> <p>FORCE takes a different view of the open spaces and of their scope for connectivity, considering the existing open spaces provide an opportunity for lasting improvement, with currently fragmented open spaces connected relatively simply and cheaply to create strategic corridors for people and wildlife, benefitting the health of residents, their green transport and employment opportunities, the quality of their available amenities and the quality of the environment and ecology. FORCE note this is crucial to health prospects of residents, their access to quality green space and the quality of the environment are all seriously degraded, even by comparison with the rest of the borough, let alone by national standards.</p>	<p>Comment noted. In Hounslow's case, it is considered that a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>FORCE favours an approach which regards the open spaces as green infrastructure, which should be targeted for investment and management plans to improve its quality, requiring investment in the removal of barriers that create severance between open spaces - integral to and enabled by the investment in housing and employment development.</p> <p>FORCE notes the Chancellor's budget statement of 22 November 2017 re. "Making best use of our urban land, and continuing the strong protection of our greenbelt." and the GLA Environment Strategy and the emerging London Plan specifically seeking to maintain and protect Green Belt within the GLA region.</p> <p>FORCE welcomes the WoBP's recognition that "increases in population in dwellings with limited private amenity space increase the need for public spaces." and are therefore concerned that the WoBP fails to reflect this recognition in its proposals to de-designate large areas of Green Belt, and in its failure to provide significant new open spaces and to provide detail as to how existing open spaces will be improved.</p> <p>FORCE does not recognise that some land currently protected as green belt no longer serves green belt purposes as most of the large tracts of green belt proposed for de-designation serve the fundamental function of demarcating settlements and preventing urban sprawl. FORCE note the WoBP recognises that "The area is made up of a number of separate town centres and villages including Feltham, Heston, Cranford, Hounslow West, Bedfont and Hanworth.", yet the Green Belt Review classifies all of LBH as an indivisible part of the London urban area and the Green Belt is intended only for the boundary with Surrey.</p> <p>FORCE note the WoBP recognises that "All of the Borough's existing Metropolitan Green Belt is located in the West of Borough area." and state that any development on this Green Belt not only deprives the West of Borough, but exacerbates the deprivation and inequities that</p>	<p>to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their on-going protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the Green Belt assessment methodology, there is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified. In respect of the importance of open spaces, the Council agrees with the critical importance of green space and, where land is released for development, the plan is setting key development requirements including the maintenance of significant tracts of land for open space. In cases where land is being re-designated for MOL, a strategy is being identified for restoring, enhancing and conserving the land. A new revised Green Belt boundary will ensure that the land remaining in the Green Belt is protected by a robust, permanent designation which will ensure its preservation and the</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>already prevail in the rest of the Borough.</p> <p>FORCE is strongly opposed to reclassifying Green Belt as Metropolitan Open Land as this simply removes environmental protections with no compensating environmental benefit and state current policy wording provides no reassurance. FORCE consider that contributions will be negotiated away in pursuit of viability, and will not compensate for the permanent loss of green belt protection.</p> <p>FORCE state the WoBP fails to explain how LBH will assess whether any development in de-designated Green Belt land has actually achieved enhancement of local open space, and what sanctions the borough will impose where the local open space is deemed to be inferior to that of the former Green Belt, with proposal to provide compensation for losses of Greenbelt and improve quality and public access to adjoining Green Belt, MOL and/or Open space is completely unsubstantiated. FORCE would like to know how compensation will be calculated and enforced, how quality will be improved, and how free public access will be maintained for residents of open-space-deprived areas who will have to travel even further to reach residual open spaces.</p> <p>FORCE would only support the alteration of Green Belt boundaries if compensating areas are added to the Green Belt such that the net quantum of Green Belt land is unchanged. FORCE would like the WoBP to exhaust the regeneration of previously developed land, i.e. the brownfield sites in the borough, before any de-designation of the green belt is considered.</p> <p>FORCE state the new open spaces provided within new developments are minuscule, and it is not clear how accessible or how welcoming to the general public these spaces will be. FORCE raise concern since these are the only new open spaces proposed within the WoBP and compare badly with that of the existing open spaces, many of which are open to</p>	<p>Council will seek to improve its accessibility for Londoners for recreation. In respect of Feltham Marshalling Yards, this area is proposed for MOL re-designation, not for release for development.</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>all, and have the potential to be improved into attractive parkland.</p> <p>FORCE welcomes the WoBP's commitment to "Protecting and enhancing the existing green infrastructure network, including the grid identified in the Mayor of London's All London Green Grid SPG." however welcome much more detail as to how the WoBP proposes to achieve this.</p> <p>FORCE notes the WoBP's proposals for Promoting the multifunctional and shared use of existing open space for play and sports including schools and private sports facilities and consider much of the WoB's current open space is available to the general public free of charge at all times of the day and year. FORCE would be concerned at any proposals which restricted public access only to those with the means to pay for it, or which reserved access for use by schools and thereby denied public access.</p> <p>FORCE welcomes in principle the proposals for "Improvements to existing parks" and "Provision of natural green corridors" (p64) but requests more detail in order to be satisfied that WoBP proposals will lead to overall environmental improvement for the borough.</p> <p>FORCE is deeply concerned by the WoBP's expectation that development respond to retained Green Belt, in particular at Feltham Marshalling yards, to ensure passive surveillance of open space uses to help encourage use of these spaces and objects to the use of development overlooking open space as a means of providing surveillance for that space. FORCE note that overlooking by housing does not encourage use, but rather deters it, does not provide effective surveillance, does not promote a sense of safety or "ownership" among residents, and does not of itself lead to improvement in the quality of the space. FORCE consider overlooking will do though is remove or reduce the quietness and peacefulness of the open space, a key characteristic of some of the larger open spaces in this area of great</p>	

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>actual and potential value to the quality of life of local people, providing enhanced mental and physical well-being.</p> <p>FORCE is opposed to any construction of housing on the Green Belt of Feltham Marshalling Yards without conditioned guarantees that the remainder of the site will be opened up to public use and managed as a new public space, and would prefer that there be no development on the Marshalling Yards site, but rather a parkland nearer to the centre of Feltham, linking with other green spaces in Feltham and contributing positively to the health and wellbeing of residents.</p> <p>FORCE supports the proposals to “Improve the overall greenness of the area” but emphasises that this must not be tokenism, stating that the greening measures should be systematic and supported with management and maintenance plans and resources.</p>	
C. Hern (Individual)	<p>The respondent states there can be no suggestion that those planning officers carrying out these earlier assessments, including the review informing the 2015 local plan, were unprofessional or otherwise lacked competence, and these Green Belt designations have been agreed as sound and robust at Inquiries and Hearings. Contrary to what is featured as a justification in the new Green Belt assessments, this new review was not featured at the 2015 Hearing as a major requirement, but merely as an incidental component in a wider set of 12 aims for the West of Borough. The Green Belt review referred to in this section of the 2015 Local Plan could well have been interpreted as the review already undertaken. With a minor wording amendment the Inspector accepted policy GB1 on the Green Belt as Sound. Had the soundness of the existing Green Belt in Hounslow been an issue of concern to the Inspector, this would have been indicated in this, GB1, section of his report.</p> <p>The respondent states that a matter for concern that whilst the Inspector, the Council and residents were agreeing these allocations as Sound at the 2015 Hearing, behind the scenes the Arup study was</p>	<p>Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>nearing completion, and must already have opined to the council the unsoundness of these same allocations. Neither the Inspector or the public were aware of this massive change, and were clearly misled, although the officers presenting the policies- all of whom left the council within the next year or so- may also have been kept unaware; if not, they were placed in an impossible situation at the Hearing. 'Garden city' proposals being prepared by Urban Initiatives for Heathrow at the same time as the Arup review were dependent on a significant release of Green Belt land- including some areas identified by Arup as having some value as Green Belt.</p> <p>The respondent states that apart from a large replacement industrial /warehouse development on Bedfont lane there have been minimal significant changes in the character of Hounslow's Green Belt since its designation since the changes of 1986, and none since 2013 review. The 'distinctiveness' of communities unchanged, and the assessments presented by Arup and repeated by the Council in the '2nd stage' study fly in the face of the many earlier interpretations and assessments and represent merely opinions.</p> <p>The respondent states the factors prompting the current review are the targets for new housing imposed by the Mayor and GLA on the borough, and the demand from Heathrow for sites to locate logistics and other service warehousing. This is essentially a claim for very exceptional circumstances necessitating the use of Green Belt land, not an issue relating to its integrity or quality</p> <p>The respondent states that a key claim throughout the present reviews and 'studies' is that all of greater west London, including Bedfont and Feltham is simply a part of the London built-up area, and therefore part of just one large town. If the built-up area is examined, the London metropolitan area is still best defined by original plan presented by Sir Edwin Herbert; The equating of the London built up area with the boundaries of the greater London area is clearly false- Epsom, the</p>	<p>potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of comments on the Green Belt Assessment methodology and the treatment of Greater London as a single built-up area, there is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified. Arup has recognised the importance of key tracts of land between settlements for the built form of the borough, and it is considered that the re-designation of key parts of the Green Belt as MOL would serve to retain the separate identity of Feltham and Heston/Hounslow and would preserve a green corridor along the River Crane valley.</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>Dittons have a closer contiguous link than Feltham- which is itself more closely adjoined with Sunbury than Hounslow. Just as Staines, Epsom and Esher are defined by their residents as separate towns, so it is with Feltham.</p> <p>The respondent states that the great majority of Feltham residents, when asked, call it a town- and in the county of Middlesex. It appears to be grudgingly accepted by Arup that Feltham might be a separate community with its own distinctiveness and character, but that although the green belt of the Crane Valley is part of this, it is not a 'primary determinant.' This disregards the historic fact that in forming the boundary between Feltham parish and the Heston/ Isleworth parishes and later the boundary between Heston/Isleworth MB and Feltham UD the river and its valley- now Green Belt- were essential to the formation- and maintenance of this identity</p> <p>The respondent states that for unexplained reasons the consultants extend their analysis outside the borough to Harlington, proclaiming that this is a distinct settlement for Green Belt purposes. To the north Harlington is separated from Hayes and the 'London built -up area' only by the M4, to the south it is contiguous along a wide front with Heathrow, held by the consultants to be part of the London built- up area. Bedford has a greater separation from Heathrow- (and Feltham from Hounslow). A green environmental circle around Heathrow featured in earlier submissions for an additional runway, and this separation is beneficial to nearby residents, who put up with the intrusions of noise, congestion and poor air quality, and are spared by the green belt from having an outlook dominated by massive warehouses</p> <p>The respondent states the analysis of 'countryside' by Arup for green belt purpose 3 gives undue emphasis to open, rural areas; 'Countryside in and around towns' is downgraded-yet the CIAT initiative which seeks to provide a high quality natural environment, with sustainability and</p>	

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>'liveability' is fully in accord with green belt designation. Green Belt countryside value is not only in wide open rural areas but smaller scale settings, with water, trees and tranquility.</p> <p>The respondent states the de-designation assessment criteria presented by Arup are not 'given truths', and it is disappointing that the 2nd stage review should accept them as such, uncritically stating that Hounslow's Green Belt along the Crane valley, Hanworth Park and adjoining the airport does not prevent neighbouring towns from merging.</p> <p>The respondent states the Arup and Council Green Belt assessments are not a review, but a re-interpretation. Such a reinterpretation of purposes 1 and 3 for Green Belt assessments in outer London has wide implications and should not be dictated by Consultants or by the needs of Heathrow airport, to be forced through borough by borough. Any recalibration should only be taken within the context of a fully examined review within the London Plan, a plan which has always recognized the importance of all parts of the existing Green Belt. Green Belt land should only be developed in very special circumstances, after an examination of all alternatives. The West of the Borough study fails to do this.</p> <p>The respondent states although given the same protection as Green Belt land, MOL is not expected to have any countryside character, nor would the loss of tranquility and intrusion from adjacent high development be concerns. This puts MOL at risk of 6, even 9 storey housing development adjacent to and dominating the open space, as is happening at the council's own site next to Lampton Park in central Hounslow. The Green Belt designation means that the separation, and a refuge, from the 'urban 'can be maintained</p> <p>The respondent states there is therefore no validity whatsoever in the claim in WOB 4 (b) that the sites identified for re-designation would be better protected and managed as Metropolitan Open Land. Maintaining</p>	

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>the long-held recognition of Feltham as a discrete or distinct settlement divided from the neighbouring town of Hounslow by open space, and this open space as having value as countryside, means that the evaluations as presented by Arup and the Council planners are radically altered. All the Crane Valley spaces, and Hanworth Park meet purposes 1 and 3, and should retain their designation as Green Belt. The sites proposed in the Plan for development were all assessed by Arup as making some contribution, to Green Belt purposes, and the Gateway and Business Park would be on land providing a separation of Bedfont from Heathrow. When the need for a third runway was first being advanced by Heathrow it was promised that a green environmental ring would surround the enlarged airport complex- a promise ignored by those promoting development to support Airport needs.</p> <p>The respondent states no consideration has been given at any planning level to the founding of further new towns in the London area to cater for population growth. Surrey should not be sacrosanct, and it might be that parts of that county would accommodate a garden town. One option would be land between Sunbury, Shepperton and Littleton; perhaps up to 250 Ha., including a new junction of the M3 and a possible further station on the Shepperton line. The green belt would be maintained to separate this garden town from Feltham and Staines. Also the increased transport capacity from Crossrail might suggest concentrating growth near its stations.</p> <p>The respondent states the development proposals are little changed from the 'garden city' presented 2 years ago on behalf of Heathrow, an appellation now thankfully discarded. It provides two separate areas for industrial/ warehousing to meet the logistics and servicing needs of the airport – with names related to the airport unchanged from the original, and sporadic areas of residential development extending from Feltham and Bedfont. These areas seem no longer to be regarded as the 'garden city- a new community,- although policy (e) indicates an aim to create a strong sense of community along Bedfont Road- but the developments</p>	

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>will result in sprawl, being neither a coherent community nor meshing with the existing towns of Bedfont and Feltham.</p> <p>The respondent states the wording of aim (e) in the open space policy promotes the use of existing open spaces for play and sports, including schools and private sports facilities. This seems to be an attempt to introduce the need for a school as a special circumstance justifying the use of open space. At the Local Plan Hearing council officers asked the Inspector to accept such an amendment. This was vehemently opposed by participating residents, and the Inspector decided that the use of the NPPF criteria was the way forward. This has been incorporated into policy GB2 of the local plan, and remains appropriate. Joint use of private facilities is clearly not feasible, and whilst schools may be prepared to let out indoor facilities this can never be guaranteed, and there are objections to public access to School playing fields both in and out of school hours.</p> <p>The respondent states the desire for security in open spaces is important, but does not justify the erection of tall buildings, up to 6 stories in height around the Marshalling Yards {WOB4 (h)}, and edges of parks or alongside waterways. Their value as 'passive surveillance' is unproven, but what has been established along the Crane valley is that well laid out and maintained cycle and footways encourage greatly increased use, and with this comes greater security and overall value. Overlooking by buildings reduces privacy, tranquillity, and rurality, and the attractiveness of the space. The plan should promote this successful alternative approach.</p>	
Cranford Park Friends (Community organisation)	Cranford Park Friends are concerned that the Local Plan does not give enough weight to the need to keep and support a 'green corridor' along the Crane catchment. This has the potential to provide a linear Regional Park – a linked area for recreation, cycling, walking and enjoyment of nature - from its source in Harrow to the Thames in LBH – but this is not recognised in the Local Plan. Furthermore, it is now in	Comment noted, but it is considered that the re-designation of large tracts of land in the centre of the borough will preserve a green corridor along the River Crane valley. The Green Belt Assessment identifies a strategy for the restoration, enhancement and conservation of these areas of land which could

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>danger of being further whittled away by piecemeal development. In total, around 110 hectares (1,100,000sqm) of green space the majority of which (101 hectares) is Green Belt, are proposed for allocation for development – in direct contradiction to London Plan policy.</p> <p>Cranford Park Friends state some 1,110,000sqm (111 hectares) – the equivalent of around 180 football pitches – of Green Belt are proposed to be lost to development. This is clearly in direct opposition to the Mayor’s stated policy to protect Green Belt and would hamper his target to make 50% of London green. Cranford Park Friends do not recognise that ‘Some land currently protected as green belt no longer serves green belt purposes.’ (p62). Most of the large tracts of green belt proposed for de-designation serve the fundamental function of demarcating settlements and preventing urban sprawl. The WoBP recognises that ‘The area is made up of a number of separate town centres and villages including Feltham, Heston, Cranford, Hounslow West, Bedfont and Hanworth.’ (p23) Yet the Green Belt Review classifies all of LBH as an indivisible part of the London urban area and the Green Belt is intended only for the boundary with Surrey.</p>	<p>encourage their use for recreation. In respect of the Green Belt boundary review and the London Plan’s stance on Green Belts, paragraphs 137-139 of the NPPF allow for Green Belt alterations if exceptional circumstances are demonstrated. In Hounslow’s case, a very substantial shortfall in the ability to meet the borough’s objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases.</p>
Queens Park Rangers Football Club (Company)	<p>QPR is supportive of the de-designation of parts of the Cranford and Heston area from Metropolitan Green Belt; however, we believe that this should also extend to the College in particular the area covered by the significant extent of existing build development, including the SuperDome. QPR are of the view that the site does not fulfil the purposes of the Green Belt as set out at paragraph 80 of the NPPF. Furthermore, continued designation as Green Belt could frustrate a sustainable pattern or development, consideration of which is required by paragraph 84 of the NPPF. This could also hamper on-going investment in the College.</p> <p>QPR consider that the revisions the West of Borough Plan offer an appropriate time to bring the site under a designation that better reflects this actual usage and context as a significant education,</p>	<p>Comment noted. The Green Belt Assessment has not recommended the parcel of land in which Cranford Community College is located for consideration for release, and the Council considers that exceptional circumstances have not been demonstrated for the release of land here. Regarding the land within which the Concorde Centre is located, the Council has considered this further following the recommendations of the Green Belt Assessment, but considers the fact that the majority of the land is in recreational use means that it is not suitable for development. It therefore considers that exceptional circumstances have not been demonstrated for the release of Green Belt land at this location.</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	community and sports facility. Therefore, QPR suggest that the College site should be de-designated from Green Belt and Instead be allocated as a site for education, community and sports use which would be a more appropriate reflection of the most sustainable and appropriate use of the site.	
Sport England (Government)	<p>Sport England supports paragraph (e) on page 64 that states the Council will seek to enable wider community use of sports facilities and playing pitches on school sites and in private ownership.</p> <p>Sport England further supports the following in the Council's approach to planning for the above; '(3) Promoting the multifunctional and shared use of existing open space for play and sports including schools and private sports facilities and playing pitches, subject to satisfactory management arrangements being put in place to enable wider community use of these spaces and/or facilities;'</p> <p>However Sport England has concerns with the following objectives as they relate to green belt, metropolitan open land and open space: with regard to (g) existing outdoor sports facilities and ancillary supporting sports facilities are sometimes located within the Green Belt/MOL. Sport England is concerned that (g) and (k) could limit the opportunity for future sports development in these locations, for example buildings to support existing sports facilities (such as clubhouses or car parking) or built development such as artificial grass pitches or Multi-Use Games Areas or other initiatives designed to increase sport or physical activity that require some built form. Paragraph 89 of the National Planning Policy Framework states that exceptions to green belt policy include; 'provision of additional facilities for outdoor sports, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it'. Sport England state with regard to (k) this may place additional costs on the development of sports facilities for community sport that could</p>	<p>Comments noted, and support for general approach welcomed. Regarding the comments on paragraphs (g) and (k) of the policy, the Council considers that these are appropriate components of the policy which will ensure key development management issues are taken into account when considering planning applications for such proposals in or affecting Green Belt/MOL. The Council does not consider that these requirements conflict with paragraph 145 of the National Planning Policy Framework (2019 version).</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>make the project unviable.</p> <p>Sport England state that to implement the recommendations of the Council's Playing Pitch Strategy and Built Sports Facilities document (and deliver on the Council's objectives for health &amp; well being), more positively worded policies within the plan are required that supports development which will help deliver more opportunities for sport and physical activity. Sport England recommends that an additional paragraph or similar is added to the text to help promote development that will contribute to the Council's commitment to help its residents pursue an active lifestyle (as set out in Chapter 3);</p> <p>Sport England would like to also see policies within the plan that specifically seek to protect playing fields from development (as required by Paragraph 74 of the National Planning Policy Framework). The Council's PPS states (pg 36); 'Hounslow Council has undertaken a Playing Pitch Strategy (PPS) and assessed existing and future needs for playing pitch provision across the Borough (see Appendices A to D). The firm conclusion is that there is an identified need to retain all existing sports grounds and other active recreation areas that are currently in use or temporarily closed pending completion of committed sports facility enhancement proposals to meet either current or future needs for these sports to 2030. Therefore the Council should apply Sport England's Protecting Playing Fields policy 'A sporting future for the playing fields of England (1997)' and resist any planning application which will result in the loss of playing field land unless the Council is satisfied that the application meets with one or more of the policy exceptions. Should a playing field/pitch (and/or sport facility of a type in scope) exist in Hounslow borough that is not mentioned in this Planning Pitch Strategy, its omission is not an endorsement by Sport England or the relevant national governing body of that sport of its disposal.'</p> <p>Sport England note Page 39 of the Strategy further highlights a number of sites which are a priority for new sports pitch provision. Where they</p>	

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>are located in the West of the Borough, these should be identified in Figures 4.8 and 4.9 of this document. The location of existing playing fields should also be highlighted to secure their protection for the future with an accompanying policy that confirms they will be protected from development.</p>	
Airport Industrial Property Unit Trust (Company)	<p>Airport Industrial Property Unit Trust (AIPUT) state the Preferred Options WoBP proposes that the Green Belt land 2.1 at the CPTe site is de-designated and allocated for employment purposes. AIPUT supports this proposal.</p> <p>On the basis that the land within the CSC site does not serve 3.17 any clear purpose as part of Heathrow Gateway scheme, AIPUT again requests that the Green Belt land is de-designated and allocated for employment / logistics use in its own right.</p> <p>There are exceptional circumstances for this, as follows:</p> <ul style="list-style-type: none"> <li>- the need for development land in the West of Borough area, including for logistics; and</li> <li>- the land within CSC site does not contribute to the fundamental aim or purposes of the Green Belt as set out in the NPPF.</li> </ul> <p>For the avoidance of doubt, these exceptional circumstances are independent of and exist without the Heathrow Gateway scheme. It is notable that that the conclusion reached by the London Borough of Hounslow Green Belt Review 2012 (Table 3, Chapter 4 of the report) is that the only purpose served by the Green Belt within the vicinity of the eastern part of the CSC site is to check the unrestricted sprawl of large built-up areas. Irrespective of this conclusion, the previously submitted representations (included at Appendix 2 to this report) consider all five purposes relative to the eastern section of the CSC site and demonstrate that it does not adequately provide for any of the these purposes. The reasons why the Green Belt within the eastern section of the CSC site does not contribute to checking the unrestricted sprawl of large built-up areas is re-produced below:</p> <ul style="list-style-type: none"> <li>- Much of the eastern part of the SCS site has already been developed and it is separated from the Green Belt to the east and south by the</li> </ul>	<p>Comments noted. Regarding Central Park Trading Estate, the Council welcomes the support for the general approach to allocating the land for employment development. Regarding the Cargo Service Centre, the council notes the comments about removing the land here and allocating it for employment development. The Green Belt Assessment found that the land here is strongly-performing Green Belt and that it should not be subject to further consideration. The council has identified that land here is sustainable and developable only in the circumstances that major new transport infrastructure is provided, and considers that it is appropriate for safeguarding, with future development taking place only in the contingency that this transformational infrastructure improvement is delivered.</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>belts of mature trees, which are protected by a TPO.</p> <ul style="list-style-type: none"> <li>- The land is therefore functionally, physically and visually separate from the wider Green Belt and cannot be said to perform any role in terms of preventing urban sprawl.</li> <li>- Its removal from the Green Belt would not therefore undermine the ability of the Green Belt in this location to prevent urban sprawl.</li> </ul>	
SEGRO (Company)	<p>SEGRO agree that addressing the demand-supply gap and meeting the ambitions of the Heathrow Opportunity Area requires a review of the Green Belt to identify areas of under-performing land that can accommodate new employment floorspace in line with Hounslow Local Plan Policy SV2. In the context of SEGRO's three sites, adjacent areas of Green Belt have a constraining influence on potential redevelopment opportunities and the release of even small areas of adjacent Green Belt can greatly improve the marketability and attractiveness of Sites to investors as this provides the flexibility to enable larger units and their yard space requirements to be accommodated. The release of areas of Green Belt from each of the three site is therefore welcomed given they no longer serve a Green Belt purpose.</p> <p>SEGRO state that where Green Belt is replaced with Metropolitan Open Land, it is important that the boundary reflects existing and approved development to ensure that it does not include land which is unnecessary to keep permanently open (see Question 35). In relation to Hatton Cross,</p> <p>SEGRO are concerned that some of the Green Belt areas are being re-designated to Metropolitan Open Land (MOL) without fully considering whether it meets the 'tests' for MOL set out in Policy 7.17 of the London Plan. One such example of this is at Site A shown on Drawing SL-P-01B (Appendix 1) (see response to Question 15 for further detail). The implication of incorrectly designating areas as MOL is that any development on this land must demonstrate 'very special circumstances' as with Green Belt policy. With such significant development pressures within the Borough, this</p>	<p>Comment noted. Following the recommendations of the Green Belt Assessment, the Council has considered this land further. In the case of Site C, the Council considers that exceptional circumstances have been demonstrated justifying the release of Green Belt land at this location for employment development only. In the case of Site B, the Council also considers that exceptional circumstances have been demonstrated justifying the release of Green Belt land at this location for employment development. In the case of Site A, the Council considers that exceptional circumstances are demonstrated justifying release of Green Belt land at this location, but that the land here should be designated as local open space.</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>has the effect of giving unwarranted protection to land that does not function as MOL; land that could be used more productively as development land. This inadvertently places pressure on more sensitive areas elsewhere; some of which will be located in less suitable/sustainable locations. On this basis, it is considered that a further assessment must be undertaken to ensure that new MOL land does perform the way it should do. It is our view that London Borough of Hounslow cannot rely on the Duty to Co-operate for its demand for industrial floorspace to be met. In light of the above, the only remaining option is to remove land that no longer forms a Green Belt functions from the existing extent to provide much-needed employment land. As such, Green Belt release is a necessary prerequisite to meeting the Borough's needs and this is reflected in Policy SV2(c) of the Hounslow Local Plan. The Green Belt, MOL and Open Space preferred policy option identifies that the Council will de-designate Green Belt sites in Bedfont, Hatton and Cranford for development and strategic transport infrastructure. SEGRO support this and particularly welcome the release of land from the Green Belt in Hatton. With regard to the three sites, Site B has been identified to be released from the Green Belt and forms part of the draft allocation for the Airport Business Park and site C has been identified to be released from the Green Belt to be allocated as for employment land. SEGRO support both of these de-designations but consider that Site A should be included with the Airport Business Park designation. Re designation of Green Belt Sites to MOL Sites The Green Belt, MOL and Open Space preferred policy option identifies that some sites will be re-designated to MOL or Local Open Space where these designations are more appropriate for continued protection and management of sites. Site A does not meet Criteria (a), (b) or (c), with regard to satisfying designation as Metropolitan Open Land. Therefore, whilst it makes a limited contribution to Criterion (d), it makes no contribution to Criteria (a), (b) or (c). Consequently, it is not appropriate to designate</p>	

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>Site A as Metropolitan Land, in principle, as set out in the London Plan.7.11Furthermore, in considering the size, scale and character of Site A, as set out in the Landscape and Visual Appraisal and Green Belt Review of the Site, it cannot be considered as “strategic open land”, and does not perform a strategic metropolitan-wide function. It therefore fails this requirement for designation of Metropolitan Open Land as well.</p> <p>With reference to designating and establishing Metropolitan Open Land, one of the first objectives that London Borough of Hounslow set out in Objective (b) of Hounslow Local Plan Policy GB1 (Green Belt and Metropolitan Open Land), is that it should “in line with the Mayor of London’s designation”. Consequently, as Site A fails the requirements for designation as Metropolitan Land, in principle, as set out in the London Plan, it therefore subsequently fails Objective (b) of the Hounslow Local Plan. Alternative Policy Option SEGRO object to the alternative policy option which states that the Council will not implement the findings of the comprehensive Green Belt Review, relying upon the Local Plan Policy GB1 (as amended) to manage Green Belt within the Borough. The alternative policy option would not be in accordance with the Inspector’s Report or Policy SV2 of the Hounslow Local Plan and, as such, this option would be ‘unsound’. Furthermore, the alternative policy option would result in the Council being unable to provide the industrial floorspace needed in the Borough.</p> <p>To support the Council’s proposals that any development in de-designated Green Belt land contributes to Green Belt, Metropolitan Open Land and local open space enhancement projects, SEGRO would require further details on the level of contribution, procedure and method of delivery. Recent experience gained from working on projects within the Borough has shown that negotiating contributions through Section 106 Agreements, on a site-by-site basis, has been a positive and effective mechanism for securing such enhancements. This has involved</p>	

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>working closely with key stakeholders (e.g. London Wildlife Trust and FORCE) to agree enhancement measures to the River Crane Corridor. The Section 106 process allows sufficient flexibility to tailor these benefits to the needs of particular places and stakeholders.8.3It is important that any contributions to enhancements do not act as an impediment to delivery by harming the viability of a scheme. Developers are already required to pay CIL, MCIL, deliver employment and training obligations as well as any other obligations identified by the Council. Paragraph 173 of the NPPF states that 'sites should not be subject to a scale of obligations and policy burdens that their ability to be developed viably is threatened'.</p>	
G. Hopper (Individual)	<p>The respondent strongly object to proposals to allocate 110 hectares (1,100,000sqm) of green space the majority of which (101 hectares) is Green Belt, for development, in direct contradiction to London Plan policy, because these parcels of land all continue to fulfil Green Belt purposes.</p> <p>The respondent also strongly object to proposals to re-designate large sections of Green Belt to Metropolitan Open Land because these parcels of land continue to perform key Green Belt functions in holding back urban sprawl and stopping towns from merging. These sites should not be redesignated and should remain as Green Belt.</p> <p>The council's 2017 Green Belt review is significantly flawed and reaches erroneous conclusions:</p> <ul style="list-style-type: none"> <li>* Completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews</li> <li>* The council gives inappropriate reasons for conducting Green Belt review</li> <li>* The 2017 Green Belt Review and the council's assessments repeatedly ignore the function of separating the distinct towns of e.g. Feltham and Ashford</li> <li>* The council appears, inappropriately, to be questioning NPPF Green</li> </ul>	<p>Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan There is no evidence that the council has adequately assessed the amount of 'derelict and other urban land' which could be 'recycled' (i.e. in relation to Green Belt Purpose 5). There are clear alternatives to building on Green Belt including intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and regenerating town centres further away from the airport noise and pollution.</p> <p>Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed.</p> <p>Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt.</p> <p>Arguments and evidence for 'exceptional circumstances' are very weak and exceptional circumstances do not exist. Site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency. Green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period.</p>	<p>base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their on-going protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.
J. Williams (Individual)	The proposal to move Green Belt protection linked to the expansion of Heathrow is not acceptable. The case for it has not been presented. It also is contrary to LBH policy. The respondent believes it necessary for the assessment of alternative sites to be made public before a decision is made.	The Council's evidence base in the form of the Employment Land Review has highlighted the quantitative need for a substantial quantum of additional employment floorspace, and has further highlighted the qualitative requirement for much of this floorspace to be located in the vicinity of Heathrow Airport to serve airport-related industries and businesses, such as distribution, storage and logistics, and well served by the national road network. The Council has carried out a thorough and robust exercise to scrutinise alternative options for delivering this development requirement. The land uncovered by this exercise is insufficient to enable the Council to bridge the gap between its land supply and its development requirements, and therefore Green Belt release is proposed on a small number of sites to help meet the identified development requirements.
J. Stewart (Individual)	The respondent is not happy with the idea of changing metropolitan green belt into Metropolitan open land. The respondent understands that they are both meant to have the same protection, but in planning applications this does not seem to be true. When it comes to green belt/open space etc the council seems to go against its own policies. Having looked at the section on Green Belt metropolitan open land and open spaces I do not feel that there is any real guarantee to protect these areas, to safeguard them, nor understanding the importance of Green spaces for conservation or importance to the environment.	The Council fully understands and is committed to the conservation, safeguarding and protection of green spaces, and the improvement of existing green spaces to improve their accessibility for recreation. The re-designation of certain tracts of land from Green Belt to MOL is proposed to provide some of the weakly-performing Green Belt land with an alternative designation which more accurately reflects its importance as open space and in preserving the built form of the capital. Policy in both existing and new

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		versions of the London Plan is clear that MOL enjoys the same status of protection as Green Belt.
E. Nuckowska (individual)	<p>The respondent objects to proposals to allocate 110 hectares (1,100,000sqm) of green space the majority of which (101 hectares) is Green Belt, for development, in direct contradiction to London Plan policy, because these parcels of land all continue to fulfil Green Belt purposes. Hounslow already has significant air pollution and traffic issues and this will further add to the problem.</p> <p>The proposals fly in the face of all the good ideas in the recently published draft London Plan and going ahead will destroy habitats and discourage the re use of Brownfield and other underused sites.</p> <p>The respondent also strongly object to proposals to re-designate large sections of Green Belt to Metropolitan Open Land because these parcels of land continue to perform key Green Belt functions in holding back urban sprawl and stopping towns from merging. These sites should not be re-designated and should remain as Green Belt.</p> <p>The council's 2017 Green Belt review is significantly flawed and reaches erroneous conclusions:</p> <ul style="list-style-type: none"> <li>* Completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews</li> <li>* The council gives inappropriate reasons for conducting Green Belt review</li> <li>* The 2017 Green Belt Review and the council's assessments repeatedly ignore the function of separating the distinct towns of e.g. Feltham and Ashford</li> <li>* The council appears, inappropriately, to be questioning NPPF Green Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan There is no evidence that the council has adequately assessed the amount of 'derelict and other urban land' which could be 'recycled' (i.e. in relation to Green Belt Purpose 5). There are clear</li> </ul>	<p>Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>alternatives to building on Green Belt including intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and regenerating town centres further away from the airport noise and pollution.</p> <p>Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed.</p> <p>Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt.</p> <p>Arguments and evidence for 'exceptional circumstances' are very weak and exceptional circumstances do not exist. Site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency.</p>	<p>with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.</p>
Cranford Community College (Non-profit organisation)	Cranford Community College is supportive of the de-designation of parts of the Cranford and Heston area from Metropolitan Green Belt; however, we believe that this should also extend to the College,	Comment noted. The Green Belt Assessment has not recommended the parcel of land in which Cranford Community College is located for consideration for

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>in particular the area covered by the significant extent of existing build development, including the Cranford SuperDome. It is our view that the site does not fulfil the purposes of the Green Belt, as set out at paragraph 80 of the NPPF. Furthermore, continued designation as Green Belt could frustrate a sustainable pattern of development, consideration of which is required by paragraph 84 of the NPPF. This could also hamper on-going investment in the College and the Local Plans desire to improve educational and health and well-being facilities. We consider that the revisions to the West of Borough Plan offers an appropriate time to bring the site under a designation that better reflects this actual usage and context as a significant education, community and sports facility. Therefore, Cranford Community College suggest that the College site should be de-designated from Green Belt and instead be allocated as a site for education, community and sports use which would be a more appropriate reflection of the most sustainable and appropriate use of the site.</p>	<p>release, and the Council considers that exceptional circumstances have not been demonstrated for the release of land here.</p>
<p>Green Belt Destruction NW7 (Community organisation)</p>	<p>Green Belt Destruction NW7 strongly object to proposals to allocate 110 hectares (1,100,000sqm) of green space the majority of which (101 hectares) is Green Belt, for development, in direct contradiction to London Plan policy, because these parcels of land all continue to fulfil Green Belt purposes.</p> <p>Green Belt Destruction NW7 also strongly object to proposals to re-designate large sections of Green Belt to Metropolitan Open Land because these parcels of land continue to perform key Green Belt functions in holding back urban sprawl and stopping towns from merging. These sites should not be re-designated and should remain as Green Belt.</p> <p>The council's 2017 Green Belt review is significantly flawed and reaches erroneous conclusions:  * Completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews  * The council gives inappropriate reasons for conducting Green Belt</p>	<p>Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>review</p> <p>* The 2017 Green Belt Review and the council's assessments repeatedly ignore the function of separating the distinct towns of e.g. Feltham and Ashford</p> <p>* The council appears, inappropriately, to be questioning NPPF Green Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan There is no evidence that the council has adequately assessed the amount of 'derelict and other urban land' which could be 'recycled' (i.e. in relation to Green Belt Purpose 5). There are clear alternatives to building on Green Belt including intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and regenerating town centres further away from the airport noise and pollution.</p> <p>Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed.</p> <p>Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt.</p> <p>Arguments and evidence for 'exceptional circumstances' are very weak and exceptional circumstances do not exist.</p> <p>Site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency.</p> <p>Green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period.</p>	<p>extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.
I. Stride (Individual)	<p>The respondent strongly object to proposals to allocate 110 hectares (1,100,000sqm) of green space the majority of which (101 hectares) is Green Belt, for development, in direct contradiction to London Plan policy, because these parcels of land all continue to fulfil Green Belt purposes.</p> <p>The respondent also strongly object to proposals to re-designate large sections of Green Belt to Metropolitan Open Land because these parcels of land continue to perform key Green Belt functions in holding back urban sprawl and stopping towns from merging. These sites should not be re-designated and should remain as Green Belt.</p> <p>The council's 2017 Green Belt review is significantly flawed and reaches erroneous conclusions:</p> <ul style="list-style-type: none"> <li>* Completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews</li> <li>* The council gives inappropriate reasons for conducting Green Belt review</li> <li>* The 2017 Green Belt Review and the council's assessments repeatedly ignore the function of separating the distinct towns of e.g. Feltham and Ashford</li> <li>* The council appears, inappropriately, to be questioning NPPF Green</li> </ul>	<p>Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan There is no evidence that the council has adequately assessed the amount of derelict and other urban land which could be recycled. (i.e. in relation to Green Belt Purpose 5). There are clear alternatives to building on Green Belt including intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and regenerating town centres further away from the airport noise and pollution.</p> <p>Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed.</p> <p>Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt.</p> <p>Arguments and evidence for ""exceptional circumstances"" are very weak and exceptional circumstances do not exist.</p> <p>Site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency.</p> <p>Green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period.</p>	<p>the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.
C. Lis (Individual)	<p>The respondent strongly object to proposals to allocate 110 hectares (1,100,000sqm) of green space the majority of which (101 hectares) is Green Belt, for development, in direct contradiction to London Plan policy, because these parcels of land all continue to fulfil Green Belt purposes.</p> <p>The respondent also strongly object to proposals to re-designate large sections of Green Belt to Metropolitan Open Land because these parcels of land continue to perform key Green Belt functions in holding back urban sprawl and stopping towns from merging. These sites should not be re-designated and should remain as Green Belt.</p> <p>The council's 2017 Green Belt review is significantly flawed and reaches erroneous conclusions:</p> <ul style="list-style-type: none"> <li>* Completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews</li> <li>* The council gives inappropriate reasons for conducting Green Belt review</li> <li>* The 2017 Green Belt Review and the council's assessments repeatedly ignore the function of separating the distinct towns of e.g. Feltham and Ashford</li> <li>* The council appears, inappropriately, to be questioning NPPF Green Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan. There is no evidence that the council has adequately assessed the amount of derelict and other urban land which could be recycled. (i.e. in relation to Green Belt Purpose 5). There are clear alternatives to building on Green Belt including intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and</li> </ul>	<p>Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>regenerating town centres further away from the airport noise and pollution.</p> <p>Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed.</p> <p>Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt.</p> <p>Arguments and evidence for ""exceptional circumstances"" are very weak and exceptional circumstances do not exist.</p> <p>Site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency. Given the proposals to increase pollution over this part of London by a third runway, where are the pollution statistics that relate to this proposal. Where is the statement on pollution levels that says they are so low that this green belt, green space, is not needed to produce clean air to bring the levels down?</p>	<p>advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic,</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		robust and fully justified.
E. Guest (Individual)	<p>The respondent is horrified by proposals to re-designate 110 hectares of Green Belt land West of borough. This is a departure from previous Green belt reviews, and there is no evidence that alternatives to re-labelling this area as Metropolitan Open Land have been adequately researched.</p> <p>The respondent states that, judging by the regrettable decision to allow MOL in Syon Lane Osterley to be commandeered for school building, MOL status appears to be very vulnerable, and seemingly no protection for green space whatsoever.</p> <p>The respondent states the decision to allow Nishkam school to get their plans approved was the "thin end of the wedge". Traffic congestion in Syon Lane North is already serious during the morning rush,(1400 vehicles/hour between 7.30 and 8.30am), and lengthy tailbacks from queues at Gillette Corner are a daily occurrence until 9.15/9.30. And all this before Nishkam school opens its doors next September, and the now certain prospect of the Bolder Academy two years later. The respondent states air quality is already bad here. It will get a lot worse, and this is where we expect our young people to travel to school</p>	<p>Comment noted. Both existing and new versions of the London Plan are clear that MOL enjoys the same status of protection as Green Belt. Both are to be protected from inappropriate development, and new London Plan policy G3 states that any development proposals which would harm MOL should be refused. Exceptional circumstances would be required to justify MOL boundary changes.</p>
K. Mckeown (Individual)	<p>The respondent strongly objects to proposals to allocate 110 hectares (1,100,000sqm) of green space the majority of which (101 hectares) is Green Belt, for development, in direct contradiction to London Plan policy, because these parcels of land all continue to fulfil Green Belt purposes.</p> <p>The respondent also strongly object to proposals to re-designate large sections of Green Belt to Metropolitan Open Land because these parcels of land continue to perform key Green Belt functions in holding back urban sprawl and stopping towns from merging. These sites should not be re-designated and should remain as Green Belt.</p> <p>The council's 2017 Green Belt review is significantly flawed and reaches erroneous conclusions:</p>	<p>Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>* Completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews</p> <p>* The council gives inappropriate reasons for conducting Green Belt review</p> <p>* The 2017 Green Belt Review and the council's assessments repeatedly ignore the function of separating the distinct towns of e.g. Feltham and Ashford</p> <p>* The council appears, inappropriately, to be questioning NPPF Green Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan</p> <p>There is no evidence that the council has adequately assessed the amount of 'derelict and other urban land' which could be 'recycled' (i.e. in relation to Green Belt Purpose 5). There are clear alternatives to building on Green Belt including intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and regenerating town centres further away from the airport noise and pollution.</p> <p>Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed.</p> <p>Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt.</p> <p>Arguments and evidence for 'exceptional circumstances' are very weak and exceptional circumstances do not exist. Site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency.</p> <p>Green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period.</p>	<p>disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL.</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.
S. Braidman (Individual)	<p>The respondent strongly object to proposals to allocate 110 hectares (1,100,000sqm) of green space the majority of which (101 hectares) is Green Belt, for development, in direct contradiction to London Plan policy, because these parcels of land all continue to fulfil Green Belt purposes.</p> <p>The respondent also strongly object to proposals to re-designate large sections of Green Belt to Metropolitan Open Land because these parcels of land continue to perform key Green Belt functions in holding back urban sprawl and stopping towns from merging. These sites should not be re-designated and should remain as Green Belt.</p> <p>The council's 2017 Green Belt review is significantly flawed and reaches erroneous conclusions:</p> <ul style="list-style-type: none"> <li>* Completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews</li> <li>* The council gives inappropriate reasons for conducting Green Belt review</li> <li>* The 2017 Green Belt Review and the council's assessments repeatedly</li> </ul>	<p>Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>ignore the function of separating the distinct towns of e.g. Feltham and Ashford</p> <p>* The council appears, inappropriately, to be questioning NPPF Green Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan</p> <p>There is no evidence that the council has adequately assessed the amount of 'derelict and other urban land' which could be 'recycled' (i.e. in relation to Green Belt Purpose 5). There are clear alternatives to building on Green Belt including intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and regenerating town centres further away from the airport noise and pollution.</p> <p>Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed.</p> <p>Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt.</p> <p>Arguments and evidence for 'exceptional circumstances' are very weak and exceptional circumstances do not exist.</p> <p>Site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency.</p> <p>Green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period."</p>	<p>potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.
I. Steward (Individual)	The respondent states that whilst there is limited difference between Metropolitan Green Belt and Metropolitan Open Land there are differences. The main one being is the ease to which applying for and getting planning permission for development on Open Land as opposed to Green Belt designation. The respondent has major concerns about the Council choosing to carry out the review without any open consultation with the environment groups that actively work to protect our green spaces. As one of the founders of Save Hounslow Heath the respondent seriously worried about the Council's intentions with this. Metropolitan Green Spaces exist to prevent urban sprawl and provide much needed outdoor recreation facilities. In the West of Borough they also act as Lungs to prevent even worse Air Quality due to the proximity of Heathrow Airport and the major congestion in this area.	Comment noted. Both existing and new versions of the London Plan are clear that MOL enjoys the same status of protection as Green Belt. Both are to be protected from inappropriate development, and new London Plan policy G3 states that any development proposals which would harm MOL should be refused. Exceptional circumstances would be required to justify MOL boundary changes. Regarding consultation, the changes are being brought forward through the local plan process which is subject to various statutory stages of consultation as well as public examination.
Heston Residents Association (Community organisation)	Heston Residents Association state that in regard to the key proposal to remove green belt protection from over 100 hectares of Open Space with the downstream purpose of large scale development linked to Heathrow Expansion, the proposal is against Government and GLA policy and contrary to the Council's own policy.  Heston Residents Association consider the proposal is significantly flawed, reaches erroneous conclusions, is different from the 2013 policy with no appropriate reasons given for reviewing the green belt. The assessments ignore the function of supporting Feltham and Ashford. There is no evidence that derelict and other urban land has	Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>been assessed.</p> <p>The proposed West of the Borough Plan conflicts with the Mayor of London’s proposals for Green Belt land. In advance of publishing his draft London Plan, the Mayor has announced that he plans to make more than 50 per cent of London green by 2050, with green infrastructure to be an “integral” part of all new developments. The Mayor advised:</p> <ul style="list-style-type: none"> <li>* his draft London Plan strengthens safeguards that prevent “harmful development on vital green land both within and surrounding the capital”.</li> <li>* he will refuse planning applications that include building on the green belt if strict rules are not met, such as replacing buildings with new ones of a similar scale.</li> <li>* he will work with boroughs to ensure public access to the green belt is maintained and the quality of it is enhanced. The draft London Plan includes guidelines for increasing green infrastructure; a framework to help boroughs and developers determine how much should be required in new developments and makes it clear green infrastructure must not be an “add-on”.</li> </ul> <p>The West of the borough Plan fails to have due regard to the Mayor of London’s draft London Plan.</p>	<p>of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough’s ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council’s Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		<p>protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.</p>
<p>Save Hounslow Heath (Community organisation)</p>	<p>Save Hounslow Heath was created in 2015 to fight a Theme park development proposal on the former Golf Course on the West side of Hounslow Heath. Part of the fight was to raise the profile of Hounslow Heath and help clean up the historic litter and bring some form of control back to the land. Since the proposal was turned down by the Council's Planning Committee we have maintained our work on Hounslow Heath; a Green Gym has started to operate and we continue with the litter picking volunteering which has encouraged others to do the same. We will continue to fight to protect the whole of Hounslow Heath whilst it still exists, despite the Planning Inspectorate granting permission.</p> <p>In this role and also as local residents, Save Hounslow Heath have taken a look at the proposals in the WoBP in relation to the Green Belt classification.</p>	<p>Comment noted. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, including Hounslow Heath, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both existing and new versions of the London Plan are clear that MOL enjoys the same status of protection as Green Belt. Both are to be protected from inappropriate development, and new London Plan policy</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>Metropolitan Green Belt and Green Belt as a whole has five purposes under the national Planning Policy Framework Guidance:</p> <ul style="list-style-type: none"> <li>• to check the unrestricted sprawl of large built-up areas</li> <li>• to prevent neighbouring towns merging into one another</li> <li>• to assist in safeguarding the countryside from encroachment</li> <li>• to preserve the setting and special character of historic towns</li> <li>• to assist in urban regeneration, by encouraging the recycling of derelict and other urban land</li> </ul> <p>In a recent consultation document released by Croydon Council it defines Metropolitan Open Land as:</p> <p>Contributes to the Physical structure of London; Includes open air facilities which serve the whole or significant parts of London; Contains features or landscapes of national or metropolitan importance; It forms part of a green chain or a link in a network of green infrastructure and meets one of the other criteria above.</p> <p>Therefore the Councils see metropolitan Open Space and Metropolitan Green Belt very differently and I am sure Hounslow Council do not treat it differently to Croydon Council. Any change in designation would lead to the potential development on land such as Hounslow Heath; the potential for encroachment from Sparrow Farm Estate into Brazil Mill Woods and present a danger to all Green Belt land in the Borough.</p> <p>Metropolitan Green Belt should be protected and the National Planning Policy should be used and read as a whole, you should not take parts of it for your own benefit or to promote an idea or policy. In 2014 the Government at the time released this statement on Green Belt; nothing has changed since then apart from the need to build more homes.</p>	<p>G3 states that any development proposals which would harm MOL should be refused. Exceptional circumstances would be required to justify MOL boundary changes.</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>Therefore it appears that the only reason for the review and the proposal to change Green Belt to Metropolitan Open Land is to provide easier access to Planning Permission to build homes on Green spaces. This is a policy that could seriously destroy the West of Borough rather than enhance it. Therefore we would ask that the all existing Green Belt land in Hounslow Borough remain as such.</p>	
Berkeley Strategic (Company)	<p>Berkeley Strategic consider that it can be clearly concluded that the Hounslow Green Belt Review is not sufficiently strategic in that principally it does not meet the clearly established undersupply of housing in South of Bedford Lane, Feltham : Reps to the Hounslow West of Borough Local Plan the HMA. The Review does not have regard to the longer-term development needs of the Borough. Berkeley Strategic states this is exemplified by the Review's omission of the Berkeley site at 'land south of Bedford Road' at Stage 1 of the Green Belt Review. The Tyler Grange study clearly sets out that Land at Feltham performs relatively poorly against the purposes of Green Belt. The site makes a low contribution to each of the three Green Belt purposes that could be applied to the area. As such, HBC should release the site; it presents a sustainable solution to meet the needs of Hounslow and the unmet needs in London.</p>	<p>Comment noted, but it is considered that exceptional circumstances have not been demonstrated for the release of Green Belt land at this location.</p>
Tidal Crane Association (Non-profit organisation)	<p>The Tidal Crane Association objects to the key proposal to remove Green Belt protection from over 100 hectares and its proposed allocation for development as expressed in the above review. We understand this to be against government and GLA policy as well as LBH policy hitherto.</p> <p>The Tidal Crane Association's particular concern is the reclassification of a large portion of the Green Belt as Metropolitan Open Land (p.28). We are aware from local experience how fragile MOP protection is: since 2013 legislation effectively means that MOL subject to a trigger event (such as enclosure) for more than 12 months automatically loses its protection and can be sold or developed unless an application (for Village Green status for example) is made to actively protect it. This relies on strength of community feeling and the organisation of a</p>	<p>Comment noted. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, including Hounslow Heath, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both existing and new versions of the London Plan are clear that MOL enjoys the same status of protection</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	complex and demanding application to save the space in question, a process which we know to be difficult and extremely time-consuming.	as Green Belt. Both are to be protected from inappropriate development, and new London Plan policy G3 states that any development proposals which would harm MOL should be refused. Exceptional circumstances would be required to justify MOL boundary changes.
S. Kabel (Individual)	<p>I strongly object to proposals to allocate 110 hectares (1,100,000sqm) of green space the majority of which (101 hectares) is Green Belt, for development, in direct contradiction to London Plan policy, because these parcels of land all continue to fulfil Green Belt purposes.</p> <p>I also strongly object to proposals to re-designate large sections of Green Belt to Metropolitan Open Land because these parcels of land continue to perform key Green Belt functions in holding back urban sprawl and stopping towns from merging. These sites should not be re-designated and should remain as Green Belt.</p> <p>The council's 2017 Green Belt review is significantly flawed and reaches erroneous conclusions:</p> <ul style="list-style-type: none"> <li>* Completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews</li> <li>* The council gives inappropriate reasons for conducting Green Belt review</li> <li>* The 2017 Green Belt Review and the council's assessments repeatedly ignore the function of separating the distinct towns of e.g. Feltham and Ashford</li> <li>* The council appears, inappropriately, to be questioning NPPF Green Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan There is no evidence that the council has adequately assessed the amount of 'derelict and other urban land' which could be 'recycled' (i.e. in relation to Green Belt Purpose 5). There are clear alternatives to building on Green Belt including intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and regenerating town centres further away from the airport noise and pollution.</li> </ul>	<p>Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed.</p> <p>Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt.</p> <p>Arguments and evidence for exceptional circumstances are very weak and exceptional circumstances do not exist.</p> <p>Site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency.</p> <p>Green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period. Please help us keep this green space to be enjoyed by future generations and not be built and lost forever.</p>	<p>expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
R. Stone (Individual)	<p>I strongly object to proposals to allocate 110 hectares (1,100,000sqm) of green space the majority of which (101 hectares) is Green Belt, for development, in direct contradiction to London Plan policy, because these parcels of land all continue to fulfil Green Belt purposes.</p> <p>I also strongly object to proposals to re-designate large sections of Green Belt to Metropolitan Open Land because these parcels of land continue to perform key Green Belt functions in holding back urban sprawl and stopping towns from merging. These sites should not be re-designated and should remain as Green Belt.</p> <p>The council's 2017 Green Belt review is significantly flawed and reaches erroneous conclusions:</p> <ul style="list-style-type: none"> <li>-- Completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews</li> <li>-- The council gives inappropriate reasons for conducting Green Belt review</li> <li>-- The 2017 Green Belt Review and the council's assessments repeatedly ignore the function of separating the distinct towns of e.g. Feltham and Ashford</li> <li>-- The council appears, inappropriately, to be questioning NPPF Green Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan</li> </ul> <p>There is no evidence that the council has adequately assessed the amount of 'derelict and other urban land' which could be 'recycled' (i.e. in relation to Green Belt Purpose 5). There are clear alternatives to building on Green Belt including intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and regenerating town centres further away from the airport noise and pollution.</p> <p>Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed.</p>	<p>Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt.</p> <p>Arguments and evidence for 'exceptional circumstances' are very weak and exceptional circumstances do not exist.</p> <p>Site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency.</p> <p>Green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period.</p>	<p>requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.</p>
K. Pillai (Individual)	I strongly object to proposals to allocate 110 hectares (1,100,000sqm) of green space the majority of which (101 hectares) is Green Belt, for development, in direct contradiction to London Plan policy, because these parcels of land all continue to fulfil Green Belt purposes.	Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>I also strongly object to proposals to re-designate large sections of Green Belt to Metropolitan Open Land because these parcels of land continue to perform key Green Belt functions in holding back urban sprawl and stopping towns from merging. These sites should not be re-designated and should remain as Green Belt.</p> <p>The council's 2017 Green Belt review is significantly flawed and reaches erroneous conclusions:</p> <ul style="list-style-type: none"> <li>* Completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews</li> <li>* The council gives inappropriate reasons for conducting Green Belt review</li> <li>* The 2017 Green Belt Review and the council's assessments repeatedly ignore the function of separating the distinct towns of e.g. Feltham and Ashford</li> <li>* The council appears, inappropriately, to be questioning NPPF Green Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan</li> </ul> <p>There is no evidence that the council has adequately assessed the amount of 'derelict and other urban land' which could be 'recycled' (i.e. in relation to Green Belt Purpose 5). There are clear alternatives to building on Green Belt including intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and regenerating town centres further away from the airport noise and pollution.</p> <p>Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed.</p> <p>Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt.</p>	<p>shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>Arguments and evidence for 'exceptional circumstances' are very weak and exceptional circumstances do not exist.</p> <p>Site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency.</p> <p>Green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period.</p> <p>The Greenbelt represents the lungs of London. If you destroy acres of it to make profit from development, it can only end badly. I do not understand how intelligent individuals can even consider destroying Greenbelt. I know it makes it look like the economy is doing well, as you circulate the money through various coffers, but given the rise in breathing difficulties developed by Londoners, and the fact that we are the highest polluters in Europe, surely common sense should tell you that cutting down woodland and clearing green fields will impact on ALL Londoners' health.</p> <p>I urge you to reconsider this decision to destroy our Natural Heritage in exchange for pieces of silver. We, as Londoners, deserve better from you. Find somewhere else to build.</p>	<p>centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.</p>
H. Coombes (Individual)	<p>I strongly object to proposals to allocate 110 hectares (1,100,000sqm) of green space the majority of which (101 hectares) is Green Belt, for development, in direct contradiction to London Plan policy, because these parcels of land all continue to fulfil Green Belt purposes.</p> <p>I also strongly object to proposals to re-designate large sections of Green Belt to Metropolitan Open Land because these parcels of land continue to perform key Green Belt functions in holding back urban sprawl and stopping towns from merging. These sites should not be re-designated and should remain as Green Belt.</p>	<p>Comment noted. Paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>We are hugely fortunate in having Green Belt land so that residents have access to green spaces between towns, limiting endless built-up areas without any 'green lungs' between.</p> <p>There are clear alternatives to building on Green Belt including intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and regenerating town centres further away from the airport noise and pollution.</p> <p>Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt.</p> <p>Green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period.</p> <p>London residents can be grateful to past local councils who had the foresight to protect green spaces. I trust that the present-day Hounslow Council will protect that legacy, having the same concern for its residents and its environment.</p>	<p>reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL,</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. The Council fully agrees with the importance of protecting green spaces, and the provision of high-quality, accessible green spaces will be a key requirement of land released for development, and the Council will seek to protect and maintain land remaining in the Green Belt as well as being re-designated to MOL.
B. Stryjak (Individual)	<p>I strongly object to proposals to allocate 110 hectares (1,100,000sqm) of green space the majority of which (101 hectares) is Green Belt, for development, in direct contradiction to London Plan policy, because these parcels of land all continue to fulfil Green Belt purposes.</p> <p>I also strongly object to proposals to re-designate large sections of Green Belt to Metropolitan Open Land because these parcels of land continue to perform key Green Belt functions in holding back urban sprawl and stopping towns from merging. These sites should not be re-designated and should remain as Green Belt.</p> <p>Current experience with the reassignment of MOL to allow planning approval Nishkam School abundantly demonstrates that reallocation and ensuing consequences e.g. traffic overload, loss of outlook, ruining the nature of a locale etc are ill thought through by the London Borough of Hounslow.</p> <p>The council's 2017 Green Belt review is significantly flawed and reaches erroneous conclusions:  * Completely different conclusions were reached in the 2013 and 2017</p>	<p>Comment noted, although the Council also notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>Green Belt Reviews</p> <ul style="list-style-type: none"> <li>* The council gives inappropriate reasons for conducting Green Belt review</li> <li>* The 2017 Green Belt Review and the council's assessments repeatedly ignore the function of separating the distinct towns of e.g. Feltham and Ashford</li> <li>* The council appears, inappropriately, to be questioning NPPF Green Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan There is no evidence that the council has adequately assessed the amount of 'derelict and other urban land' which could be 'recycled' (i.e. in relation to Green Belt Purpose 5). There are clear alternatives to building on Green Belt including intensifying nearby industrial and retail sites, redeveloping huge surface car parks, and regenerating town centres further away from the airport noise and pollution.</li> </ul> <p>Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed.</p> <p>Sustainable Development has not been adequately assessed: any assessment must weigh benefits against the significant harm caused by building on Green Belt.</p> <p>Arguments and evidence for 'exceptional circumstances' are very weak and exceptional circumstances do not exist.</p> <p>Site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency.</p> <p>Green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period.</p>	<p>Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow expansion, and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. This is considered to be not compatible with the Opportunity Area status of the Heathrow area. Were the plan to fail to meet its full local housing requirement, it would similarly have negative social consequences and would render it not to be in general conformity with the London Plan. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both the existing and new versions of the London Plan are clear that MOL has the same status of protection as Green Belt and that the principles of national Green Belt policy also apply to MOL. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
		emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.
AGC Property Limited (Company)	<p>The NPPF requires local planning authorities to keep Green Belt designations under review. We note that the Council's Green Belt Review (2017) which underpins the draft Plan, recommends reclassifying a large portion of the Green Belt as Metropolitan Open Land (MoL). This includes Hanworth Park House.</p> <p>Policy P1 - Feltham Place Policy – refers to the masterplan that has been produced by LB Hounslow for the Feltham area, to ensure a comprehensive design-led approach to new development and improvement.</p> <p>Part (k) of the policy supporting the sensitive refurbishment of heritage assets including Hanworth Park House through enabling residential or hotel development.</p> <p>We advocate the proposed de-designation of the Park to MoL, as a step in the right direction to save the listed Hanworth Park House. We strongly endorse policy P1(k), which presents the in-principle support for the sensitive refurbishment of the House through an enabling development.</p> <p>We consider that the proposed policy should go one step further. The owners of the site have assessed all practical locations for the enabling development. This assessment is set out in detail within the planning documentation under application 01359/F/P8. Alternative sources of funding were also explored but none were forthcoming. Accordingly, it is suggested that the in-principle support for enabling development under policy P1(k) should sanction development within land adjacent to the House which is available for development, and as</p>	Comment noted and support for general approach welcomed. The Green Belt Assessment recommends MOL status for this land and the Council accepts that this would be an appropriate designation here (with the exception of the built-up areas in the north of the parcel).

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	illustrated on the Council's Feltham Masterplan (Fig 27, extract below), approved by the Council on 19 September 2017. In support of the above, we further acknowledge and support policy WOB4, in particular paragraph 4. The policy acknowledges the LB Hounslow have fully examined all reasonable options for meeting identified development requirements to meet housing needs, but concedes that it is now necessary to consider the potential for release of green belt sites. This will help 'close the gap' in meeting objectively assessed need for housing (and employment).	
C. Hern (Individual)	<p>Second stage review of GB now finally on line- can you inform me where the examination of what constitutes a ' distinct town' is to be found as this is very much open to argument, and simply accepting Arup's version is insufficient</p> <p>I await a response to my request re point (e) on page 64 of the WOTP- which flies in the face of the Inspector's views at the hearing, now in the local plan. Is the vulnerability of open space to all sorts of development restricting its area and use intended for the areas to be developed, for the west generally, or the whole borough? I have submitted a FoI request re Arup's review, which seems to be prepared in concert with the so called 'Heathrow garden city' proposals - published three months later in June 2015. You referred to the latter in the issues consultation- though my concerns were not included in your report, Why was the Arup review not mentioned in this consultation?</p> <p>The second stage review of Green Belt only now available and dated October 2017 appears a fait accompli , as it could not have informed the work on the draft plan which commenced at the beginning of the year</p>	Comments noted. In respect of the references to the 2017 Stage 2 study, this was a draft study which was further testing the options of a range of sites, including emerging sites from the Council's capacity work and parcels identified in the Stage 1 study, for their performance against Green Belt purposes and other characteristics. The final Stage 2 study has been carried out by independent consultants Arup. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by Arup is objective, strategic, robust and fully justified.
Hounslow Green Party	<p>I am opposed to taking land out of the borough's Green Belt and redesignating it for development.</p> <p>I support the alternative policy option that you have outlined on page 67 of the main West of Borough review document. This is covered in</p>	Comments noted. The Council considers that exceptional circumstances have been demonstrated justifying the release of land to help meet development requirements. Measures to manage transport impacts of development would be set out in the site development requirements.

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>more detail in the Integrated Impact Assessment report, prepared by consultants. For example, they say that allowing development in the Green Belt will lead to an increase in road transport through an increase in housing and employment land."...This is likely to lead to increased overall greenhouse gas emissions in the West of Borough through leading to more significant increases in the areas built footprint." (IIA report page 27) In other words if you build more housing on the Green Belt nearest to the edge of London you will increase road traffic.</p>	
T. Henderson (Individual)	<p>I do not agree with the large-scale redesignation of green belt land to MOL particularly for Hounslow Heath and other areas in the Crane Valley (such as Pevensey Road Nature Reserve , Feltham Marshalling Yard, DeBrome Field and Hanworth Park))</p>	<p>Comment noted. In respect of MOL re-designations, the Council's Green Belt Assessment Stage 1 concluded that some of the parcels in the north and centre of the borough met Green Belt purposes only weakly, but that they were areas of particular local value for the importance of their open space. The Council therefore decided to commission an assessment of whether such tracts of land would be more suitably classified as MOL, in order to provide for their ongoing protection with a more relevant designation. In several cases, including Hounslow Heath and other parts of the Crane Valley corridor, the resulting study has recommended that the status of the land should indeed be changed to MOL. Both existing and new versions of the London Plan are clear that MOL enjoys the same status of protection as Green Belt. Both are to be protected from inappropriate development, and new London Plan policy G3 states that any development proposals which would harm MOL should be refused. Exceptional circumstances would be required to justify MOL boundary changes.</p>
Heston Residents' Association (Community organisation)	<p>The Green Belt, Metropolitan Open Land (MOL) and Open Space preferred policy option must be compliant with the Mayor of London's draft London Plan. The proposed West of the Borough Plan conflicts with the Mayor of London's proposals for Green Belt land. In advance of publishing his draft London Plan, the Mayor has announced that he plans to make more than 50 per cent of London green by 2050, with</p>	<p>Comment noted, but paragraphs 137-139 of the NPPF allow for Green Belt alterations where exceptional circumstances have been demonstrated. In Hounslow's case, it is considered that exceptional circumstances have been demonstrated, including due to the shortfall in the borough's ability to meet its development</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>green infrastructure to be an “integral” part of all new developments. The Mayor advised:</p> <ul style="list-style-type: none"> <li>• his draft London Plan strengthens safeguards that prevent “harmful development on vital green land both within and surrounding the capital”.</li> <li>• he will refuse planning applications that include building on the green belt if strict rules are not met, such as replacing buildings with new ones of a similar scale.</li> <li>• he will work with boroughs to ensure public access to the green belt is maintained and the quality of it is enhanced. The draft London Plan includes guidelines for increasing green infrastructure; a framework to help boroughs and developers determine how much should be required in new developments and makes it clear green infrastructure must not be an “add-on”. The West of the Borough Plan fails to have due regard to the Mayor of London’s draft London Plan.</li> </ul> <p>Heston Residents' Association do not agree with the preferred policy seeking compensation for the loss of Green Belt by enhancing other open spaces in the area as the green belt needs to be fully protected and expanded in line with the Mayor of London's draft Local Plan.</p>	<p>requirements. The Council fully agrees with the need for improvements in Green Infrastructure provision, and such improvements, together with the protection of key areas of open space, would form part of the development requirements for sites released for development. For areas proposed to be re-designated to MOL, the Green Belt Assessment sets out a suggested strategy for conserving, enhancing and restoring these tracts of land, to make them more accessible for recreational activities such as walking and cycling.</p>
London Diocesan Fund (Company)	<p>London Diocesan Fund agrees with the Green Belt, Metropolitan Open Land (MOL) and Open Space preferred policy option and the preferred policy seeking compensation for the loss of Green Belt by enhancing other open spaces in the area.</p>	<p>Support welcomed</p>
R. Clarke (Individual)	<p>Re-designating sites from Green Belt is not appropriate. It contradicts the statement that the Green Grid will be maintained. The Council has existing funding to build a path through the Marshalling Yards as a condition of the Post Office site development - it has had the past 15 years to do this, and has failed to do so. These existing commitments should be enacted as a priority. The Green Belt review appears to have been carried out inadequately, with no consultation. The approach taken fails to take into account its role in preventing urban sprawl between communities (e.g. between Feltham, Hounslow, Bedfont,</p>	<p>Comments noted. The re-designation of parcels to MOL in the Crane Valley corridor will ensure a high level of protection - the same status as Green Belt - to key sites in the corridor. The Green Belt review has been carried out through the local plan review, which is subject to key stages of statutory consultation and a public examination. There is no nationally prescribed methodology for carrying out a Green Belt assessment, but the Council considers that the method deployed by</p>

WoB4 Green-Belt, Metropolitan Open Land and Open Space		
Respondent	Representation Summary	Council Response
	<p>Hanworth, Whitton). It goes against the policies of the draft London Plan, and should be annulled, and a new transparent approach which considers small sites, rather than attempting to de-designate over 100 ha of Green belt - which contradicts the findings of the Council's previous reviews.</p> <p>The 'alternative policy approach' is inadequate, as it would be possible to identify individual sites that can accommodate some development. The Council needs to review this option appraisal to consider an realistic alternative. More needs to be done to emphasise the green chain - there are currently blockages at the A30 and A4 where it is not possible to easily cross these roads to continue a walk along the Crane. These need to be prioritised. Any development near this important route should be sensitive to the context and enhance the green spaces, rather than putting industrial boxes. Work should also be done to ensure that there are good draw along the routes. A cycle route along the railway line from Bridge House Pond to Feltham Marshalling Yards should also be safeguarded. The open, semi-rural context of Hounslow Urban Farm should also be recognised in any development, and access opened up along the Longford River. More focus should be on Hanworth Park, Hanworth and connections to Kempton.</p> <p>An alternative Green Belt Review that does not take the London Built Up Area as the sole criteria for considering Urban Sprawl. A consultation on the ToR for this review which includes local stakeholders.</p> <p>Biodiversity Offsetting is a controversial area - and the recommendations of the House of Commons Environmental Audit Committee should be followed - it must follow the mitigation hierarchy, and full compensation is required that includes multipliers for time impacts.</p>	Arup is objective, strategic, robust and fully justified.
G. Pollitt (Individual)	The respondent agrees with the Green Belt, Metropolitan Open Land (MOL) and Open Space preferred policy option and the preferred policy seeking compensation for the loss of Green Belt by enhancing other	Support welcomed

<b>WoB4 Green-Belt, Metropolitan Open Land and Open Space</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	open spaces in the area.	
Boundaries Road Residents Association (Community organisation)	The respondent agrees with the Green Belt, Metropolitan Open Land (MOL) and Open Space preferred policy option and the preferred policy seeking compensation for the loss of Green Belt by enhancing other open spaces in the area.	Support welcomed
S. Ambrose (Individual)	The respondent agrees with the Green Belt, Metropolitan Open Land (MOL) and Open Space preferred policy option but does not agree with the preferred policy seeking compensation for the loss of Green Belt by enhancing other open spaces in the area.	Comment noted
Noyces Funfair (Company)	The respondent does not agree with the Green Belt, Metropolitan Open Land (MOL) and Open Space preferred policy option, nor the preferred policy seeking compensation for the loss of Green Belt by enhancing other open spaces in the area.	Comments noted

<b>WoB5 Transport and Connectivity</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
Canal and Rivers Trust (Non-profit organisation)	<p>Within the Key Issues here, the plan notes that cycling routes are limited, poorly marked, and that walkability can be limited. We would like to work with LB Hounslow in developing improved routes and links (both here and for the Western Corridor). The Grand Union Canal can also support the aims of this section, particularly e) and g) with regard to cycling and healthy communities.</p> <p>With regard to the following paragraph, the Canal &amp; River Trust would also like to be included as a strategic partner who should be involved in enhancing cycling access throughout the Borough:</p> <p>“Implementation:</p> <p>4. Work with strategic partners to enhance the cycling access throughout the Borough by seeking to implement the Cycle Superhighway strategy of the London Plan (2016), Quietways, and improve existing cycle networks.</p> <p>5. Enhance walkability in the West of Borough by ensuring pedestrian</p>	Support noted. This response has been sent to the relevant services in the Council. The Council will engage with strategic partners when undertaking detailed work on the enhancement of walking and cycling access throughout the Borough.

WoB5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	access is embedded in new development and future infrastructure improvement plans such as safer access at rail crossings and enhanced walkability to green spaces such as De Brome Playing Fields, Hanworth Park, Hounslow Health and along the Crane River.”	
TfL (Government)	<p>TfL notes the aspirations for extensions to Cycle Superhighway 9 that extend beyond Brentford into the west of Borough area. Public consultation on potential extensions to the west of Brentford is due to take place in late 2018.</p> <p>Transport and Connectivity - Southern Rail Access to Heathrow TfL has previously expressed concerns about the specific southern rail access proposal put forward by Hounslow Council in the 2015 Issues Papers. TfL remains of the view that the borough's proposals, with a new Heathrow Gateway station oriented around an expansion of the Bedfont Lakes development, are sub-optimal. Notwithstanding any concerns about the proposed de-designation and potential development of green belt land at this location, the scheme as proposed would be inadequate in addressing the fundamental need for new rail capacity associated with Heathrow expansion. Moreover, it would hinder rather than help efforts to relieve the rail congestion the Local Plan identifies at the key Feltham station hub. As stated in previous responses, the importance of the southern rail access proposal to the delivery of the proposed new homes and employment in the west of the borough is not made clear. We would suggest that this justification is provided. Furthermore, TfL considers it important that alternative transport and connectivity proposals are considered that could be taken forward in the absence of the specific southern rail proposal outlined in the West of Borough Plan.</p>	<p>Comment noted. The Council has carried out a Transport Impact Assessment to provide a strong evidence base to support transport proposals put forward in the draft West of Borough Local Plan Review. The Council sees the SRA alignment with a station at Clockhouse Roundabout as a game-changing piece of infrastructure that will bring much needed improvements to rail connectivity for the area. The Council will continue to work with strategic partners such as TfL to improve public transport and accessibility in the area.</p>
Be Living (Company)	<p>Be Living is supportive of the proposed Southern Rail Access to Heathrow Airport with a new station interchange at Bedfont, This will provide a long-awaited and much needed link to Heathrow which will support growth and significantly enhance connectivity through the area. While this is currently not funded and therefore not a committed scheme, the appetite for this link is very strong throughout the industry.</p>	<p>Support noted. The Council will continue to advocate for the rail projects put forward in the West of Borough Local Plan review.</p> <p>The Council considers that the current proposed alignment displayed on the Heathrow Southern Railway</p>

WoB5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	<p>Be Living also supports the enhanced provision of rail services at Feltham Station. We are aware that the new South Western Railway operator is planning to enhance their timetable in December 2018 and are currently consulting stakeholders about their proposals. This generally involves a doubling of service frequency on the Windsor and Reading lines.</p> <p>"Be Living is not aware of an alternative policy that the Council should consider however we strongly recommend that the Council should:</p> <ul style="list-style-type: none"> <li>· Work closely together with Heathrow Southern Railway Limited (HSRL) on their proposals along with their investors or other funding sources; and Page 21 of 34</li> <li>· Collaborate with South Western Railway to ensure the rail provision is the best for the local community, particularly given the current opportunity to consult with SWR on their timetable.</li> </ul> <p>Cycle parking provision around transport hubs / interchanges should be reviewed to increase the potential for cycling with high quality secure and covered cycle parking provided where possible. TfL's proposals for Cycle Super Highway 9 in conjunction with the London Borough of Hounslow, and the London Borough of Hammersmith and Fulham will assist in the desire to improve cycle infrastructure and promote cycling. This would provide high quality cycle facilities linking west Kensington, Hammersmith, Chiswick and Brentford town centres to make cycling and walking easier, safer, and more appealing which is supported subject to due consideration of existing constraints i.e. improvements need to be realistically achievable.</p>	<p>website would not provide the maximum benefits to Hounslow residents. The HSRL alignment routes through Staines and would require Hounslow residents to travel eastward through Staines to access Heathrow, an option that would provide minimal benefits to most residents in the Borough. In addition, without an additional rail station at the Clockhouse Roundabout in Bedfont, and supporting surface access infrastructure PTAL would remain low for much of area. The Council would be open to collaborating with HSRL if their proposed route was aligned through the Borough.</p> <p>The Council is working with TfL, developers, and the community to improve cycling provision across the Borough which includes improved cycle lanes, increasing cycle parking infrastructure and providing cycle safety education.</p>
A. Young (Individual)	<p>Existing cycle routes, including recently built greenway cycle routes (e.g.. north of Bedfont Lakes), should be retained when new industrial and residential developments are built.</p> <p>We strongly support the two-pronged extension of Cycle Superhighway 9 to Hatton Cross (bordering Heathrow Airport) and Feltham Town</p>	<p>Support noted, this approach has been considered in plan. The Council will continue to work with TfL to support this project and has taken note of the request to improve the quality of the cycle route along the river crane. The Council will continue to work with Heathrow to ensure that residents needs are put first in the event</p>

WoB5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	<p>Centre.</p> <p>The greenway cycle route along the River Crane plays a prominent role in these plans. We ask for the quality of its surface to be improved north of Staines Road and also around the Feltham Circles and Cavalry Tunnel.</p> <p>We strongly support the creation of new cycle routes, such as that through Upper Crane Park as a means of ensuring the west of the borough remains well connected while also providing opportunities for a healthy lifestyle and a realistic choice of using less polluting transport.</p> <p>We urge for protected cycle lanes to be included in the proposed new road tunnel linking Heathrow Terminals 1,2 and 3 with Southern Perimeter Road New residential areas should be planned with filtered permeability so that they do not immediately become rat-runs.</p>	<p>of an expansion at Heathrow and will continue to lobby for access improvements to Heathrow</p>
TfL Commercial Development (Government)	<p>TfL CD support the overall approach set out in Policy WOB5 with respect to encouraging solutions that encourage sustainable transportation. However with respect to parking provision (g), it should be taken into account that the draft London Plan strongly advocates for residential car parking to be restricted, with car free development being the starting place for developments that are well connected by public transport. We would suggest therefore that this paragraph be more strongly worded so that lower than London Plan maximum standards or car free development is expected where appropriate and at higher PTAL locations.</p>	<p>Comment noted, this approach has been taken into consideration and reflected in Policy WoB5 where appropriate, taking into consideration limitations such as low PTAL levels in parts of the borough and low density residential areas.</p>
Windowflowers Ltd (Company)	<p>A new railway station at Clockhouse Roundabout [station at Bedfont/Heathrow Gateway] will bring significant benefits to this part of the Borough. As it stands the west of the borough is not well served by public transport, and a new rail service designed to enhance links between the southern counties and Heathrow Airport will inevitably bring investment, jobs and improved sustainability to the area. This can only be seen a positive addition to this part of Hounslow and something which we continue to support, given the benefits to be achieved not</p>	<p>Support noted. The Council will continue to advocate for the rail projects and proposed improvements to infrastructure put forward in the West of Borough Local Plan review. The Plan has been informed by the Evidence Base in order to develop the Local Plan policies, including growth phasing based on infrastructure deliverability.</p>

WoB5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	<p>only in relation to our clients site, but also for the wider local area.</p> <p>We wholeheartedly support the content of draft policy WOB5 and the proposed improvement in infrastructure and accessibility to this part of the borough.</p> <p>We welcome the pragmatic approach being proposed by the Council as an alternative policy option for WOB5. In particular their willingness to positively review alternative accessibility options should the Southern Rail Access Proposal not come to fruition. We would ask that the Council seek to take the same positive approach to the alternative policy options for growth policies WOB1 and WOB2 for the reasons set out above.</p>	
S. Thompson (Individual)	<p>Just found your consultation on cycling in Hounslow via the Hounslow Cycling website, it's very exciting news for Feltham. I think that existing cycle routes, including recently built greenway cycle routes (eg. north of Bedfont Lakes), should be retained when new industrial and residential developments are built and improved, for example, the cycle route on the B377 requires the cyclist to slow on the exit of a blind bend to access the cycle lane.</p> <p>I strongly support the extension of Cycle Superhighway 9 to Feltham Town Centre. The greenway cycle route along the River Crane plays a prominent role in these plans. I ask for the quality of its surface to be improved north of Staines Road and also around the Feltham Circles and Cavalry Tunnel.</p> <p>I strongly support the creation of new cycle routes, such as that through Upper Crane Park as a means of ensuring the west of the borough remains well connected while also providing opportunities for a healthy lifestyle and a realistic choice of using less polluting transport. New residential areas should be planned with filtered permeability so that they do not immediately become rat-runs. The area around Feltham station needs some work to ensure safe cycling, especially if the</p>	<p>Support noted, this approach has been taken forward in Transport Policy WOB6 where possible. The Council will continue to work with TfL to support this project. This comment has been passed to the transport team for review, however, no revision to the text of the Plan is considered necessary. Support welcomed for the creation of new cycle routes; this approach has been taken forward in Policy WoB6.</p>

WoB5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	level crossing is to be replaced.	
P. Cook (Individual)	<p>I use the greenway cycle route a lot along The Crane to avoid traffic and keep safe and ask the council to improve its road surface around Cavalry Tunnel, the Feltham Circles and north of Staines Road.</p> <p>I support extending the CS9 to Hatton Cross and Feltham Town centre because these routes are currently dangerous of cyclists and pedestrians. I support retaining the recently built greenway cycle routes north of Bedfont Lakes and believe these routes must be retained whenever new residential or commercial developments are built in the area, these cycle routes serve to protect pedestrians and cyclists from dangerous speeding traffic in the area.</p> <p>I strongly support and urge you create new cycle routes through Upper Crane Park to better connect the area and promote more use of the route. There needs to be protected cycle lanes in this proposal for the new road tunnel that links the Heathrow terminals (1-3) with the South Perimeter Road to protect cyclists from the dangers of speeding traffic and HGVs.</p>	<p>Comments noted. Comment relating to road surface improvements and a new cycle routes through Upper Crane Park have been passed to the transport team for review, however no revision to the text of the Plan is considered necessary. Support noted. The Council will continue to work with TfL to support this project. This approach has been taken forward in Local Plan Policy WOB6. The Council will continue to work with Heathrow to ensure surface access arrangements relating to active travel infrastructure have been carefully considered as part of the Heathrow expansion project.</p>
D. Bhail (Individual)	<p>In relation to extending the rail links I think the borough missed a trick by not linking the mainline at Feltham back to one of the Heathrow terminals. The extra station proposed maybe closer...but you could have linked this straight to T5 which have opened up the entire west area for commuting. That would have made a major difference.</p> <p>I think the cycle paths in Hanworth Park are in the wrong position but should extend through the park linking all 4 corners. Pointless having a cycle path parallel to a road where cycling already exists. There should also be an entrance to the back of the leisure centre which wold open this resource into the park.</p>	<p>The Council's proposed route for Southern Rail Access includes a link to Feltham Station, as well as an additional station at Clockhouse Roundabout. The route up to T5 would continue off the mainline so passengers could travel directly from Feltham to Heathrow. Comments related to cycle paths in Hanworth Park have been passed to the transport team for review, however, no revision to the text of the Plan is considered necessary</p>
Friends of the River Crane Environment (Charity)	<p>FORCE supports the WoBP's recognition that "Public Transport from the West of Borough to Heathrow Airport is limited." (p70) However, the WoBP places heavy emphasis on new infrastructure – Southern Rail Access – and increased public bus and rail services. FORCE would place</p>	<p>Comment noted. Improvements to cycle and pedestrian access across the West of Borough area has been taken forward and policy has been amended. Cycling infrastructure is an integral part of improving</p>

WoB5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	<p>much more emphasis on the provision and improvement of pedestrian and cycleways, which are currently wholly inadequate. These could play a major role in improving air quality around Heathrow and encouraging employees to cycle to their places of work around the airport.</p> <p>In particular, FORCE would like the WoBP to recognise that the upper Duke of Northumberland's River and the upper Longford River, running alongside Heathrow Airport Terminal 5, the Cargo Terminal and Terminal 4, have the potential to form a strategic link for cyclists and pedestrians between the south of the Airport and the lower Crane valley. A high-quality pedestrian and cycle route would directly link the Airport with Feltham and Hanworth, and with Hounslow, Twickenham, Isleworth and the Thames. This route would provide safe, healthy, affordable journey-to-work opportunities for WoB residents at Heathrow, as well as providing attractive, high-quality, healthy leisure facilities for residents. This proposal links to proposals put forward by FORCE and considered by Heathrow Airport Limited for improvements to cycling and walking provision to and around the Heathrow site (see also Appendix A).</p> <p>In this context, FORCE is deeply concerned that the alignment of the Southern Rail Access shown in Figure 4.10 appears to compromise the strategic potential of this route. West of Terminal 4, the alignment appears to be built over the Duke of Northumberland's and Longford Rivers towards the Cargo Terminal and Terminal 5.</p> <p>FORCE supports the proposal to develop the Greenways route along the Longford River (p71), but notes that there is no such proposal, nor even recognition, that the lower Crane valley could provide similar connectivity into Heathrow. Neither Figure 4.1 nor Figure 4.10 show any proposals to improve pedestrian or cycleways along the River Crane between Feltham Marshalling Yards and Hatton Cross. Indeed, Figure 4.1 shows a proliferation of disconnected, unjoined-up [sic] pedestrian/cycle routes which will potentially remain unaddressed after 15 years of "Strategic Opportunity."</p>	<p>connectivity in the area and in enhancing health and wellbeing. The alignment shown in Figure 4.10 in the Draft WoB Local Plan review was not an exact alignment, rather a design interpretation of the proposed SRA route. Preservation and/or re-provision of existing cycling and pedestrian infrastructure will be a priority where possible if the SRA were to be approved for alignment through Hounslow.</p>

WoB5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	<p>The WoBP lists “water ways” as a “barrier” to pedestrian access routes (p70). Yet the River Crane could provide a significant pedestrian and cycleway both for local residents and Heathrow employees. However, it suffers major severance from the difficult crossings of the A4, the A30 and the A312. FORCE believes that Heathrow Airport expansion, and any other major development in the West of Borough, provides a significant opportunity to secure funding to overcome these barriers and complete high-quality pedestrian and cycleway linkages along the lower Crane valley.</p> <p>FORCE supports the proposals for “enhanced walkability to green spaces such as De Brome Playing Fields, Hanworth Park, Hounslow Heath and along the Crane River” (p72) and would seek investment in these green spaces to improve their value as attractive destinations for local residents.</p>	
C. Hern (Individual)	<p>A key problem is the proposed railway link. Under the 2018 South Western Train proposals all the train paths into Waterloo are in use. A half hour service might be inserted, with a 40min journey to Waterloo. Crossrail will link Heathrow directly with central London, with 4, later 6 trains each hour, and a similar journey time to Waterloo, via Bond St. There will be an impact on the Heathrow Express service, and there would seem no chance of an early commitment to the Southern Heathrow rail link.</p> <p>A second possibility, discussed further below, is a link to Crossrail 2 from the Shepperton line, which would require the station location to be rethought, reducing the Gateway value. The overall masterplan for Bedfont Lakes and the Gateway is flawed and should be scrapped, re-evaluated, and looked at afresh when any rail link is committed.</p> <p>A new rail link from the South West line into Heathrow is an essential feature in the plan. The possibility has been raised of a Crossrail 2 link from Kingston, in a tunnel, to Heathrow. This is hardly feasible, but an</p>	<p>Comment noted. The Council has carried out initial studies showing the feasibility of the SRA alignment, and will go through due process to ensure SRA is the optimal rail infrastructure for Hounslow residents. In addition to this the Council carried out a transport assessment to provide a strong evidence base to the transport proposals put forward in the WoB Local Plan review policies. The Council will continue to advocate for sustainable travel options to Heathrow and the surrounding areas.</p>

WoB5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	<p>extension could easily be taken off the Shepperton line (which will be served by Crossrail2) where it bends around Kempton park, using existing wide arches under the A316 and run on unbuilt land to the south and west of Lower Feltham., The double tracks up to Bedfont Rd would need no demolitions, although replacement allotments would be required, and there would be three road crossings. A crossover or underpass at the Windsor/ Reading SW line would be needed, with any junction arrangement expensive.</p> <p>The new line into Heathrow should also facilitate non-premium direct rail access across the airport from Hounslow and Feltham to Hayes and other stations on the West main line, to encourage orbital sustainable travel. This would be of much greater value to residents than the airport termini.</p> <p>On the connectivity map some cycle routes are shown, with wider linkages no more than 'tendrils'. The opportunity, and longstanding ambition of local groups to provide a cycle/ pedestrian route along the Crane valley. In what should have been a plan to energise and enhance the whole west of the borough this is yet another opportunity that has been missed.</p>	
Sport England (Non-departmental public body)	Sport England supports the Council's intention to (g) and (h) improve pedestrian and cycle access across the Borough and ensure new developments provide cycle parking. Encouraging residents to be more active helps residents to be more physically active and make healthier choices.	Support noted.
SEGRO (Company)	In relation to Strategic Objectives 8, 9 and 10, SEGRO support measures that promote more sustainable modes of transport as an alternative to private car usage. Given the Borough's strong logistics market, it is important that the Strategic Objectives relating to enhancing connectivity take into account the needs of the logistics sector. The nature of the logistics industry means it is heavily reliant upon road infrastructure. All too often, urban freight is often overlooked and HGVs and vans need to be able to move around within	Comments noted. The Council has taken these points into consideration in the Local Plan review Policy WoB6

WoB5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	<p>the City. A lack of capacity on urban networks adds costs and delays which are ultimately passed on to firms and consumers and can affect international competitiveness. Heathrow's Cargo Strategy 'Becoming one of Europe's best airports for cargo' (2016) (Appendix 14) describes the Airport's plans to invest £160 million in to cargo and double freight volume from 1.54 million tonnes in 2016 to 3 million tonnes per annum by 2040 by improved service and increased capacity through a Third Runway. However, no new road infrastructure is planned; only improvements to existing road infrastructure. It is important that measures to control congestion do not hit the storage and distribution disproportionately hard. This calls for greater co-ordination between land uses planning and infrastructure and supports the case for Heathrow-related uses to be delivered in close proximity to the Heathrow Cargo Centre to minimise the need to travel.</p>	
J. Stewart (Individual)	<p>The problem we have in Feltham is that we are already too overpopulated, the transport system is overcrowded, you may be able to get on the bus but try getting of it with a shopping trolley. The buses are not suitable for large numbers of pushchairs, only two people with pushchairs can get on a bus and then you wonder why people drive. We could go back to the old days when you had to fold up a push chair, but I cannot see parents of today being happy doing that.</p>	<p>Comment noted. The Council will continue to work with TfL to improve transport frequency and connectivity in the West of Borough area to accommodate development growth</p>
R. Bouchier (Individual)	<p>Existing cycle routes, including recently built greenway cycle routes (eg. north of Bedfont Lakes), should be retained when new industrial and residential developments are built.</p> <p>I strongly support the two-pronged extension of Cycle Superhighway 9 to Hatton Cross (bordering Heathrow Airport) and Feltham Town Centre. The greenway cycle route along the River Crane plays a prominent role in these plans. We ask for the quality of its surface to be improved north of Staines Road and also around the Feltham Circles and Cavalry Tunnel.</p> <p>We strongly support the creation of new cycle routes, such as that through Upper Crane Park as a means of ensuring the west of the</p>	<p>Comment noted. The Council is working with TfL, developers, and the community to improve cycling provision across the Borough which includes improved cycle lanes, increasing cycle parking infrastructure and providing cycle safety education.</p>

WoB5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	<p>borough remains well connected while also providing opportunities for a healthy lifestyle and a realistic choice of using less polluting transport.</p> <p>We urge for protected cycle lanes to be included in the proposed new road tunnel linking Heathrow Terminals 1,2 and 3 with Southern Perimeter Road New residential areas should be planned with filtered permeability so that they do not immediately become rat-runs.</p>	
I. Stewart (Individual)	<p>I fully support any improvement in Public transport services but not at the risk of losing homes to accommodate new rail services. When the original plans for the link line from Feltham to LHR were muted they implied that some loss of existing flats would be necessary; no mention of this appears in this consultation but from memory the rail line appears to be going on a very similar route. Has an impact assessment been carried out in relation to this idea that you heavily support? The roads in Feltham are already heavily congested and the fact that it is quicker to walk two miles than drive is absurd. Nothing in this consultation genuinely addresses the congestion in the whole of the West of Borough.</p>	<p>Comments noted. The SRA alignment has not yet been confirmed so no comments on the potential loss of land can be given. Initial feasibility studies have been carried out, however a full impact assessment will be carried forward following further support from strategic partners for the Hounslow alignment. The alignment shown in the Draft WoB Local Plan review was not an exact alignment, rather a design interpretation of the proposed SRA route. The Council will continue to consult with the community as plans for the Southern Rail Access link come to fruition.</p>
Heathrow Airport Limited (Company)	<p>We note that the plan makes specific reference to Heathrow's expansion plans including a new road tunnel linking the Terminals 2 and 3 with the Southern Perimeter Road. We must advise that the proposal for a southern road tunnel remains under consideration as we develop our expansion proposals further.</p> <p>Additionally, we note the Plan's reference to a new southern rail access to the airport from the Reading to Waterloo line. Whilst we remain supportive of the principle of a southern rail access to Heathrow, the promotion and delivery of a new rail link currently rests with the rail industry, not Heathrow.</p> <p>The draft Plan should also recognise that a new western rail access is already being promoted by Network rail through its preparation of a DCO.</p>	<p>Comments noted. Plan policy wording revised where necessary to reflect this.</p>
T. Henderson (Individual)	<p>I support the proposals to extend the CS9 route to Hatton Cross and</p>	<p>Comment noted. The Council is working with TfL,</p>

WoB5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	<p>Feltham (but also believe that an additional route is needed to provide safe segregated cycle access to the existing Heathrow Central Terminal Area, probably via the Bath Road or another alternative route). I think the Crane Valley cycle route should be extended northwards from Pevensy Road Nature Reserve through the Cavalry Tunnel and proceed to the Staines Road (either along the river or through the Sparrow Farm estate) and so avoid an alternative to traffic in central Feltham.</p>	<p>developers, and the community to improve cycling provision across the Borough which includes improved cycle lanes, increasing cycle parking infrastructure and providing cycle safety education.</p>
<p>Heston Residents' Association (Community organisation)</p>	<p>The respondent does not agree with the Transport and Connectivity preferred policy options. The respondent suggests that there may be additional or alternative policies that the Council should consider in relation to Transport and Connectivity and how sustainable forms of travel (e.g., rail, bus, walking and cycling) could be developed in the future to serve the West of Borough but does not provide any examples.</p>	<p>Comment noted</p>
<p>LB Hounslow Public Health (Government)</p>	<p>We are pleased to see cycling and walking promoted. It would be helpful, if appropriate, to include something about 'signposting' for the network, wherever such active travel infrastructure is mentioned. The active travel network should be clearly and frequently signposted to encourage use. We would like the requirement for 'signposting' to the network mentioned throughout the plan, if possible. Where possible, we would like to see cycle paths that are physically separated from motor vehicles. This would encourage more people (especially children) to cycle.</p> <p>Where possible, we would like to see cycle paths that are physically separated from motor vehicles. This would encourage more people (especially children) to cycle. We are pleased to see cycling and walking promoted. It would be helpful, if appropriate, to include something about 'signposting' for the network, wherever such active travel infrastructure is mentioned. The active travel network should be clearly and frequently signposted to encourage use. We would like the requirement for 'signposting' to the network mentioned throughout the plan, if possible. To encourage walking, more attractive street arrangements (eg as outlined in the 'Healthy Streets for London') could</p>	<p>Comments noted, and comments taken into consideration in the draft submission version of the WoB Local Plan review. Comments relating to active travel infrastructure taken into consideration in the revised WoB Local Plan review. The Council has fully integrated the Mayor's Healthy Streets approach into WoB policy in order to encourage active travel, including street legibility and enhanced connectivity.</p>

WoB5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	be helpful, together with well signposted, safe linkages to key venues (eg schools, workplaces, housing and transport).	
Hounslow Cycling (Charity)	<p>Hounslow Cycling strongly supports the two-pronged extension of Cycle Superhighway 9 to Hatton Cross and Feltham Town Centre. Existing cycle routes, including recently built greenway cycle routes (eg. north of Bedfont Lakes), should be retained when new industrial and residential developments are built. The greenway cycle route along the River Crane plays a prominent role in these plans. We ask for the quality of its surface to be improved around the Feltham Circles and Cavalry Tunnel. We strongly support the creation of new cycle routes, such as that through Upper Crane Park as a means of ensuring the west of the borough remains well connected while also providing opportunities for a healthy lifestyle and a realistic choice of using less polluting transport. We urge for protected cycle lanes to be included in the proposed new road tunnel linking Heathrow Terminals 1,2 and 3 with Southern Perimeter Road. New residential areas should be planned with filtered permeability so that they do not immediately become rat-runs.</p> <p>We urge for protected cycle lanes to be included in the proposed new road tunnel linking Heathrow Terminals 1,2 and 3 with Southern Perimeter Road. Hounslow Cycling would welcome a cycle hire scheme that had drop off points at Hatton Cross, Feltham and Heston.</p> <p>Hounslow Cycling strongly supports the two-pronged extension of Cycle Superhighway 9 to Hatton Cross and Feltham Town Centre. Clear signposting of the route along the Longford River between Feltham Railway station and Hatton Cross with a new clear toucan crossing over Staines Road to link Ruskin Avenue with Kingston Avenue would be an improvement that could allow sustainable transport to develop.</p>	Comments noted and these have been taken into consideration in the revised WoB Local Plan review Policy WOB5. The Council will continue to improve street legibility through sign posting and improved crossings in an effort to encourage healthy active life styles.
H. Andrews (Individual)	If the railway line goes through Feltham to the new Bedfont Station it should either be underground or there're should be sufficient crossing places. The plans I saw did not have any provision for people to cross the line thereby cutting one side of town from the other and causing	Comments noted. The SRA alignment has not yet been confirmed so no comments on the potential loss of land can be given. The alignment shown in the Draft WoB Local Plan review was not an exact alignment, rather a

WoB5 Transport and Connectivity		
Respondent	Representation Summary	Council Response
	<p>social isolation which apparently is not the objective. Also the new railway line branches off more or less right outside HMYOI Feltham which employs over 1000 people yet this proposals will make it more difficult to get to the jobs that already exist. At the moment it takes me 40 minutes to walk to work but would only take 10 to 15 if I could cross the existing railway line at a more convenient place. I am sure more people would walk to places if it was made easier and also help with the obesity.</p> <p>The respondent suggests creating crossing places over the railway line in order to develop more sustainable forms of travel in teh WoB area.</p>	<p>design interpretation of the proposed SRA route. The Council will continue to consult with the community as plans for the Southern Rail Access link come to fruition.</p>
London Diocesan Fund (Company)	<p>London Diocesan Fund agrees with the Transport and Connectivity preferred policy options. London Diocesan Fund suggest that there are additional or alternative policies that the Council should consider in relation to Transport and Connectivity and intimates that there may be further suggestions for how sustainable forms of travel (e.g., rail, bus, walking and cycling) could be developed in the future to serve the West of Borough but does not provide any provide any examples.</p>	<p>Comment noted</p>
R. Clarke (Individual)	<p>Too much priority is given to Buses - these need to be made cleaner, and speeds reduced or enforced. Feltham should be a 'Low Emission or Liveable Neighbourhood. Currently the plans have too much focus on Heathrow - more consideration is needed to connections outside the borough - e.g. the Crane Valley walk which is obstructed at the A4 and A30. Also connections to Hampton, Twickenham, and the character of the A312 in Hanworth - this needs more trees, and the area made safer (e.g. Zebra crossing near A316). A cycle route along the railway line from Bridge House Pond to Feltham Marshalling Yards should also be planned and safeguarded.</p> <p>Improved CCTV for public spaces to make people feel safer, including safe bicycle parking. The proposals for Feltham High Street currently do not meet the requirements of the Healthy Streets Approach. The railway bridge needs to be widened to accommodate a cycle lane, and bus stops removed from the bridge. Reducing the number of traffic</p>	<p>Comments noted. Buses provide a cost effective, much needed public transportation option for areas of the borough that do not have rail infrastructure and buses are integral to achieving sustainable travel in the WoB area.</p> <p>Heathrow is a major employer for residents of the WoB area and beyond, it is therefore important that travel to and from the airport is as efficient as possible.</p> <p>Improvements to the Feltham mainline, including the Feltham Station upgrade, and the proposed SRA alignment would improve access to both the east into central London through Twickenham, and the southwest out to Staines. Improvements to cycle and pedestrian access across borough, including in and around Feltham are encouraged within Policy WoB5 and the Feltham Place Policy P1.</p>

<b>WoB5 Transport and Connectivity</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>lights, such as at Feltham High Street/Bedfont Lane, and more use of speed bumps to slow traffic - e.g. Hanworth Road. There is a need to consider safe walking and cycling routes, and opportunities to engage children in the public realm to encourage travel to school.</p> <p>Instead of focusing development solely near existing bus stops, combining new cycle provision with cycle parking at public transport hubs will enable sustainable development. This could make sites in Hanworth more viable. This approach is how Bogota and the Netherlands have developed cycling.</p>	<p>Comments noted and taken into consideration in the revised draft submission version of the WoB Local Plan review. The Council has integrated a Healthy Streets approach into WoB policy to encourage healthy active travel, including street security and connectivity. The Feltham Station major project includes plans for an enhanced crossing over the rail line and the closure of the level crossing at Bedfont Lane.</p>
G. Pollitt (Individual)	<p>The respondent does not agree with the Transport and Connectivity preferred policy options but considers the public transport in Feltham is more than adequate given that all areas are covered and existing links to Heathrow. The respondent notes that if the hub at Bedfont is approved then there would be excessive Heathrow links.</p>	<p>Comments noted. The Council sees improved public transportation and rail infrastructure critical to creating sustainable and accessible communities as the area grows. A rail link to Heathrow with a station at Clockhouse roundabout would not only provide direct rail links to Heathrow, but would also connect Bedfont with Feltham, the south west, and central London along the mainline rail line.</p>
Boundaries Road Residents Association	<p>The respondent agrees with the Transport and Connectivity preferred policy options but states that the Council should stop telling resident not to use their cars as it will not be possible to shop using public transport.</p>	<p>Comment noted. The Council supports the improvements to public transportation infrastructure in order to tackle congestion on the roads, reduce car dependence and thereby improve air quality through reducing vehicle movements</p>
S. Ambrose (Individual)	<p>The respondent does not agree with the Transport and Connectivity preferred policy options and suggests that the Plan should aim to create more segregated cycle routes across the borough.</p>	<p>Comment noted</p>
Noyces Funfair (Company)	<p>The respondent agrees with the Transport and Connectivity preferred policy options.</p>	<p>Support welcomed</p>

<b>WoB6 Health and Wellbeing</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>

WoB6 Health and Wellbeing		
Respondent	Representation Summary	Council Response
Canal and Rivers Trust (Non-profit organisation)	As above, the Trust would be pleased to work with LB Hounslow to support the aims of this section, in terms of providing a high quality, safe and convenient walking and cycling network	Comment noted. The Council would be happy to work with the Trust on future walking and cycling network improvement proposals where appropriate.
TfL(Government)	<p>This could be reflected throughout the Plan but particularly in outlining 'Our approach' in sections (e) and (g) of this policy and it could be reinforced by explicit references to these principles in both the Design and Health and Well Being chapters.</p> <p>In tandem with this TfL suggests that the policy should make it clear that any highway improvements would be designed to prioritise walking, cycling and public transport rather than provide capacity for private modes. The ordering and wording of priorities could be altered to read as follows:</p> <p>'The Council is committed to optimising new and existing transport networks to ensure the provision of new pedestrian and cycle networks, improve access to public transport systems, enhance the public realm and provide congestion relief where required'</p> <p>Section (f) could also be amended to read as follows:</p> <p>'Ensuring housing and economic growth are supported by strategies to encourage and enable behaviour change as well as improvements to existing road network to ease congestion. This is especially relevant in existing traffic hotspots such as Feltham Town Centre.'</p> <p>In section (g) TfL welcomes the intention to limit the (car) parking provision within new developments</p> <p>In section (h) a reference could be added to the London Cycling Design Standards as follows:</p> <p>'Ensure that new developments provide cycle parking facilities in accordance with the appropriate standards in the Local Plan and London Plan and guidance in the London Cycling Design Standards (LCDS)'</p> <p>'The provision of pedestrian and cycle-friendly connections in and around Feltham Town Centre and along major routes will help create people-focused spaces and 'healthy streets', achieving a shift away from car use.'</p> <p>In the alternative policy option on page 74 it would be helpful to add a</p>	Comment noted and recommendations taken forward in policies contained in the draft submission version of the WoB Plan.

WoB6 Health and Wellbeing		
Respondent	Representation Summary	Council Response
	<p>new bullet point as follows: 'Implementing measures to discourage unnecessary car journeys through restricted parking, limited access for vehicles by time of day/ vehicle type, and low speeds in accordance with the draft MTS.'</p> <p>The document does not fully address parking provision associated with developments. The document should identify and acknowledge the link between parking and car use. It is important that the West of Borough Plan does not perpetuate high levels of parking provision and this should be reflected in policies which should take account of the Draft London Plan parking standards.</p>	
Education Funding Agency (Government)	The ESFA welcomes reference within the plan to support the development of appropriate social and community infrastructure and specifically para 6.13 which confirms 'The timely delivery of regeneration in the WoB area is intrinsically linked with the need to deliver the infrastructure necessary to enable development and provide facilities and services to meet the needs of those living, working and visiting the area - such as schools and health facilities'	Support noted
Friends of the River Crane Environment (Charity)	<p>FORCE does not agree that as it currently stands "The promotion of health and well-being is a key thread running through this Plan" (p78). Key opportunities are being missed by the plan as it currently stands. We believe that one of the keys to providing effective health and wellbeing, which is affordable and accessible, is an infrastructure of high quality green spaces, attractive as destinations, and linked to each other by safe, attractive pedestrian and cycleways. These green spaces need to be considered as an infrastructure network in exactly the same way as the transport network infrastructure.</p> <p>Our own research over the last 5 years, which we would be pleased to share with LBH, demonstrates that enhanced open spaces linked by improved pedestrian and cycleways attract step-changes in use by the public. The opening of such a route alongside the lower Duke of Northumberland's River on the LBH border stimulated a tenfold increase in public use within a month of opening. Our research also shows that once they have decided to visit an open space, at least</p>	Comment noted. Some recommendations have been taken forward in policy WoB3 of the draft submission version of the WoB Plan.

WoB6 Health and Wellbeing		
Respondent	Representation Summary	Council Response
	<p>three-quarters of walkers and cyclists seek to link more than one open space in their visit.</p> <p>FORCE regards the approach to green spaces in the WoBP as fragmented, tactical and unlikely to fulfil its potential in terms of improving public health and wellbeing. We would like to see a much greater commitment to retention of green spaces in the deprived West of Borough, to investment in those green spaces, and to well-resourced management and maintenance plans for the spaces.</p> <p>FORCE strongly supports the recognition that severance is a major deterrent to walking and cycling for residents (p33) and recommends in particular that the WoBP addresses the barriers to connectivity of the existing River Crane walking and cycling route. As noted above, the route suffers major severance from the difficult crossings of the A4, the A30 and the A312. FORCE recognises that these may be potentially significant barriers to overcome, but believes that the development of the Airport Business Park and Heathrow Gateway should fund all of these improvements. This is entirely consistent with the WoBP aim to “maximise opportunities for compensatory environmental...benefits from partners such as Heathrow Airport, in order for residents in West of Borough area, to lead a happier and healthier lifestyle.” (p77)</p> <p>FORCE believes that the WoBP, with its proposals for de-designating the Green Belt, promoting housing and accommodating Heathrow expansion, is incompatible with its own Strategic Objective 12 for Health and Wellbeing. The reduction in the quantum of available open space, and an increase in population and development, will not “enhance...open space” or “encourage...healthier choices.” The WoBP’s proposals will increase the distance that residents have to travel to access open space, and when accessed, the open space is likely to be degraded by development and overuse.</p>	
Queens Park Rangers Football Club	QPR welcomes the promotion of access to sports facilities, play and recreation opportunities and 4.50. We consider that this goal should be	Comment noted and this approach has been taken forward in the draft submission version of the WoB Plan.

WoB6 Health and Wellbeing		
Respondent	Representation Summary	Council Response
	given greater prominence within the Draft Local Plan. As identified in the Key Issues of Policy WOB6, the proximity to Heathrow Airport and high levels of childhood obesity in the West of the Borough give rise to a need to ensure delivery of community infrastructure. Therefore we would suggest that the text of 'Our Approach' sub-paragraph be amended to include the Cranford neighbourhood.	
Cranford Community College (Non-profit organisation)	Cranford Community College welcomes the promotion of access to sports facilities, play and recreation opportunities and 4.50 (e). We consider that this goal should be given greater prominence within the Draft Local Plan. As identified in the Key Issues of policy WOB6, the proximity to Heathrow Airport and high levels of childhood obesity in the West of the Borough give rise to a need to ensure delivery of community infrastructure. Therefore, we would suggest that the text of 'Our Approach', sub-paragraph (h), be amended to include the Cranford neighbourhood and include the school as a major contributor to the wellbeing agenda.	Comment noted. Strategic polices are not meant to be site specific in nature unless this would fulfil a strategic function. Health and wellbeing is now fully considered within the place policy for policy P5 Cranford and Heston in the draft submission version of the WoB Plan.
Heathrow Airport Limited	One final point we wish to make is in respect of the physical activity needs assessment referred to which shows high levels of inactivity in the borough. It is suggested that a contributing factor is the severance caused by the arterial roads bringing millions of passengers to Heathrow cutting through the area. The roads in the area undoubtedly have a significantly wider function than just serving Heathrow's passengers, so we respectfully request that the link between Heathrow's passengers and resident inactivity is removed.	Comment noted. The draft submission version of the WoB Plan has been amended following extensive engagement with community organisation, residents, businesses, landowners and key stakeholders and partners.
Heston Residents' Association (Community organisation)	The respondent does not agree with the Health and Wellbeing preferred policy options and considers that there any additional or alternative policies that the Council should consider in relation to Health and Wellbeing, but does not provide any examples.	Comment noted.
LB Hounslow Public Health (Government)	LB Hounslow Public Health agree with the Health and Wellbeing preferred policy options but would add something also about future proofing and ensuring that design is 'dementia friendly' and also allows older and less mobile people to be active very close to home in safe and attractive surroundings.	Comment noted. Policy has been amended to reflect the need for developers to provide Health Impact Assessments for major developments.

WoB6 Health and Wellbeing		
Respondent	Representation Summary	Council Response
	<p>Improvement of parks/ access to parks/ safety of parks Accessible safe play space for all ages for all new housing Safe and signposted walking and cycling routes from all housing to transport, work and schools Safe and signposted links to green and blue space Ensuring that plan is also 'future proofed' by requiring new planning to be 'dementia friendly'.</p> <p>Healthy Streets for London document  <a href="https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets">https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets</a> It would be helpful if the document also referenced some other population groups that have specific planning needs eg those with disabilities and also people with dementia. The document could make mention/ aim for the planning to be 'dementia friendly'. (See: reference could also be made to 'Dementia and Town Planning (Royal Town Planning Institute, 2017): <a href="http://www.rtpi.org.uk/media/2213533/dementia_and_town_planning_final.compressed.pdf">http://www.rtpi.org.uk/media/2213533/dementia_and_town_planning_final.compressed.pdf</a></p>	
Hounslow Cycling (Charity)	Hounslow Cycling support the use of open spaces as active travel routes. For active lifestyles to take hold, it is also important that legible cycle routes are clear and protected when they cross major junctions near schools. Hounslow providing cycle hire at Feltham Railway station and Feltham High Street with clear signposting to Hatton Cross, Hounslow Urban Farm, Bedfont Parks and Twickenham via the River Crane in order to improve healthy and active travel options.	Comment noted
H. Andrews (Individual)	I have noticed that the only new shops opening are fast food outlets. Perhaps we could have a moratorium on fast food and more community spaces for fitness classes. There is a high predominance of fast food outlets. We obviously do not need that much food! Maybe some incentives for people to hold fitness classes. Local schools have facilities that are not used out of hours. I have been looking for night school and fitness classes near me and there is nothing within walking distance of my house that I can use after work. It appears all the adult education is in Cranford which is not easy to get to from Feltham. Our library is	Comment noted and taken forward in polices set out in the draft submission version of the WoB Local Plan review.

WoB6 Health and Wellbeing		
Respondent	Representation Summary	Council Response
	<p>hidden away and that should be made more visible. I looked at a community centre in Twickenham that lots of different classes for local people and also counselling services and AA meetings etc and thought we should have somewhere like that at the Bedford end of Feltham as well as something like the Airparks facilities which is two buses away for people at this end of town.</p> <p>I have heard there is a waiting list for allotments. If that is so maybe some space could be made for this. Health, wellbeing, fitness and nutrition looked after especially if most of the new builds will be flats.</p>	
London Diocesan Fund (Company)	The respondent agrees with the Health and Wellbeing preferred policy options. The respondent states that they have suggestions for how to encourage people to be more physically active.	Comment Noted. Policy WoB3 has been amended and updated to reflect the need for development within the opportunity to be air quality positive as required by draft London Plan policy SI1.
R. Clarke (Individual)	<p>The Health and Wellbeing preferred policy options need to be stronger - it needs to prevent harmful development that will cause air and noise pollution rather than just seeking to mitigate it. This includes existing air routes, but also a third runway, which the Council must oppose. The policy approach is good, but the rest of the document undermines it, such as destroying community assets (Sparrow Farm), not sufficient focus on improving existing gems - such as Hanworth Park House. More needs to be done to advertise existing assets - e.g. the Community space at the Feltham Centre - there is no advertising of public meetings. The Council needs to change its approach to consultation to be community-led, and inspired by outcomes, rather than development. It should specify outcomes such as Green Flags for outdoor spaces, maintenance of playgrounds - both of which are currently inadequate in the area. Closing roads to cars to encourage playstreets should be made a policy, with a simple approach which can be managed by the community themselves.</p> <p>A suggestion for how to encourage people to be more physically active would involve high quality public spaces. Led training in areas where people will notice and want to join. Safe routes - 20mph areas, speed</p>	Comment Noted. Some recommendations have been taken forward. Policy WoB3 has been amended following feedback and extensive engagement with community organisation, residents, businesses, landowners and key stakeholders

<b>WoB6 Health and Wellbeing</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>bumps, enforcement. Park and stride locations for schools.</p> <p>Additional or alternative policies that the Council should consider in relation to Health and Wellbeing include: importance of community links - Festivals and culture, free/subsidised use of public spaces for community events - and enforcement against drinking in parks.</p>	
G. Pollitt (Individual)	The respondent does not agree with the Health and Wellbeing preferred policy options and states that if the air quality is below standard then why build more homes, factories and warehouses to add to that pollution.	Comment Noted
Boundaries Road Residents Association (Community group)	Boundaries Road Residents Association agrees with the Health and Wellbeing preferred policy options.	Support welcomed
S. Ambrose (Individual)	The respondent agrees with the Health and Wellbeing preferred policy options but suggests doing more to encourage use of bicycle for local journeys to support people to be more physically active.	Comment Noted
Noyces Funfair (Company)	The respondent does not agree with the Health and Wellbeing preferred policy options but does not provide further examples of policies that could be introduced.	Comment noted

<b>WoB P1 Feltham</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
Greater London Authority (Government)	Subject to good design, high and higher density development would be welcome in this accessible location. There are concerns over the loss of open space. Hounslow should develop a clear strategy for open space provision in the area, in partnership with the local community and existing users. The recommended height limit should not restrict appropriate and well-designed development in the Station Quarter.	Comments noted. The proposed policies on heights and density in Feltham are derived from the Feltham Masterplan. Locations for taller buildings have been identified and are subject to stricter design controls, included in Tall Buildings policy CC3 in the Local Plan. Policies P1(u)-(w) set out proposals for increasing the quality of and access to open space in the area.
Be Living (Company)	Be Living considers the general approach to the Feltham Neighbourhoods positively. Details regarding housing delivery targets for the area are considered premature prior to the publication of the Replacement London Plan and flexibility should be provided throughout to encourage development. With regards to figure 5.3, we consider that	Comments noted. Capacity for development in Feltham is based on the Feltham Masterplan, with the locations for taller buildings in the Station Quarter identified in the Feltham Place policy and Figure 5.3.

WoB P1 Feltham		
Respondent	Representation Summary	Council Response
	the Station Quarter should be identified as having the potential to deliver a 'Landmark Building' and this should be identified on the plan. This would be in-keeping with the development aspirations for the sites as set out within the site allocations of the Local Plan Review and the Feltham Town Centre Masterplan.	
K. Cox (Individual)	I am writing to you to specifically express my support for the restoration of Hanworth Park House. This house and site is iconic - it has nearly 1,000yrs of notable history, and over the last hundred years has shaped the lives of thousands of local families who came to the area during WWI and WWII to help make this country what it is today.	Support noted. The plan supports sensitive refurbishment of heritage assets including Hanworth Park House.
Friends of the River Crane Environment (Charity)	FORCE is opposed to the re-designation of all of the Feltham Marshalling Yards site from its current status as a Metropolitan Site of Importance for Nature Conservation (p89). FORCE believes that proposals for any construction on Feltham Marshalling Yards represent a missed opportunity to bring extensive green space nearer to the heart of Feltham, and to provide strategic linkage between the green spaces proposed in the Feltham Masterplan and the entire green corridor of the lower Crane valley as far as the Thames. FORCE would prefer to see investment in improving all of the existing Feltham Marshalling Yards site to provide a high-quality and readily accessible green space for Feltham residents. In particular, given the legacy of previous development on this site, we are opposed to any construction of housing on Feltham Marshalling Yards without conditioned guarantees that the remainder of the site will be opened up to public use and managed as a new public space. FORCE supports the proposals to "de-culvert, naturalise and create a path alongside the Longford River to create a high-quality open space" (p89)	Comments noted. Feltham Marshalling Yards is no longer allocated for redevelopment as part of the WOB Plan. Support noted regarding the improvements proposed to the Longford River.
I. Stewart (Individual)	My first observation is the statement about Feltham Town Centre being identified as a London District Centre; an explanation of what that actually means is missing but to the majority of people that live in Feltham this proves that Hounslow Council does not understand Feltham. Feltham has a small town mentality and the residents that have lived here for generations still consider the area a collection of villages. Feltham is in Middlesex and again, the majority of residents do	Comments noted. The classification of Feltham as a District Centre is made by the Mayor in the London Plan, not by the Council. However the Council supports the recognition of Feltham as a key retail and employment destination for the wider area. Place Policy WoB P1 limits new development in Feltham to six storeys, with the exception of landmark buildings in two locations

WoB P1 Feltham		
Respondent	Representation Summary	Council Response
	<p>not consider themselves as living in London. This situation makes a massive difference to the type of development that existing residents will accept; unless this consultation genuinely doesn't care about local residents? Feltham has a very bad history of seeing the Town degenerate due to tall buildings; previously Hounslow Council made a commitment in this area to medium rise buildings of no more than 4 to 6 stories, this is a commitment they should abide by in Feltham. 1.6 (d) of the consultation document states that you will "Take forward the recommendations of the Feltham Town Centre Master Plan". During the consultation period for this a lot of residents commented on the plans for the Showman's Guild site on Station Estate Road and New Road; the petitions against this and the comments and feedback from Local residents was overwhelming. Why is this still on this Consultation document? If the level of feedback generated from the first consultation is ignored, is there any purpose in this consultation? On page 22 the figures used to show what everyone already knows, that this side of the Borough has lower earning employment than the East side of the Borough, are at best dubious; £865.00 per week gives a 52 week income of £44,980.00. Considering House prices in Feltham area are much lower than Chiswick, £44,980 would be a nice income. I am the only income earner in my household and I don't earn that much even though my employment is in the East of the Borough. How much of the population increase statistics are reliant on Heathrow expansion? Has the affects [sic] on population caused by Brexit been taken into consideration? What measures have been used to determine why 1 in 6 people in this Borough move on every year and what can be done to reduce the migratory levels; this constant turnover starts to erode Community feel in towns and leads to increases in anti-social behaviour and isolation. Nothing in this consultation is addressing these concerns, only highlighting them. Feltham Town Centre as a Housing Zone is a bad idea as the accessibility to land in the Town Centre was limited without going higher until the MOD site became available - this was after the Town Centre was declared a Housing Zone. I have stated this a lot of times during these consultation workshops that the MOD site, properly</p>	<p>indicated in the places policy map. Policy WOB1 sets out a range of measures to support local employment, including protecting employment and industrial sites and bringing forward affordable workspace. In relation to the Housing Zone, the vast majority of new homes will be provided on the MOD site and the Station Quarter, with a smaller number being provided along the high street itself. The plan no longer allocates the Station Lane Estate for redevelopment, and seeks to meet the future needs of the Travelling Showpeople community in the West of Borough.</p>

<b>WoB P1 Feltham</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>managed would be heavily supported by the existing population of Feltham. The availability of this land should also lead to the removal of Station Estate Road from the West of Borough Plan. The new estate that would be created on the MOD site should have major local input. Allowing the existing population a chance to name the roads, blocks of flats and parks through social media polls would encourage local participation and acceptance. The shopping centre in Feltham is welcoming and enjoyable; this is a far cry from Hounslow which is overdone, unwelcoming and very stressful to be in. Anything that affects the existing shopping experience in Feltham should be considered very seriously; the reduced accessibility during the railway bridge works has not been seriously thought through; any increase in the heights of buildings could make the High Street seem unwelcoming; any reduction in parking would lead to the shops not being used as much as they are now. Feltham is not a Central London Town, it is suburbia at it's best and trying to create a London experience in Feltham would destroy it completely.</p>	
Heston Residents' Association (Community organisation)	The respondent does not agree with the approach set out in the Feltham Neighbourhoods preferred policy option and suggests that there may be other land uses that could be supported in this place, however no examples are given.	Comment noted.
Hounslow Cycling (Charity)	Hounslow Cycling advocated filtered permeability in the design of new residential areas to prevent the creation of rat-runs. This is relevant to the potential redevelopments in Station Quarter and Feltham East.	Comment noted.
London Diocesan Fund (Company)	The respondent agrees with the approach set out in the Feltham Neighbourhoods preferred policy option.	Support welcomed.
R. Clarke (Individual)	Any buildings in the Feltham Station quarter to be subject to strict design controls - because of the sensitivity of the impacts on the Conservation Area- including station backdrop and views from other heritage assets (e.g. Bridge House Pond, Longford river). There is a need to develop an alternative policy option that improves access to Feltham Park without requiring the Showpeople to leave. There is existing funding to improve the route through the Marshalling Yards - this should be used instead, and funding from the Mayor's Greener City	Comment noted. The proposed development in the Station Quarter was subject to an extensive masterplanning exercise which took the Conservation area and other heritage and natural assets into consideration. The plan requires proposed development to seek to protect and enhance the conservation area and ensure that any development integrates with existing character in order to form a legible change in

<b>WoB P1 Feltham</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	Fund used. The respondent suggest a museum and cafe at Hanworth Park House, and Tourist information hub at Bridge House Pond, as other land uses that could be supported in this place.	character.
G. Pollitt (Individual)	The respondent does not agree with the approach set out in the Feltham Neighbourhoods preferred policy option and states that housing and commercial use can cause upset if the commercial part ignores the rights of the domestic users i.e. deliveries in the early hours, alarms going off in the early hours especially when the key holder lives a commute away.	Comment noted.
Boundaries Road Residents Association (Community organisation)	The respondent agrees with the approach set out in the Feltham Neighbourhoods preferred policy option.	Support noted.
S. Ambrose (Individual)	The respondent agrees with the approach set out in the Feltham Neighbourhoods preferred policy option.	Support noted.
Noyces Funfair (Company)	The respondent does not agree with the approach set out in the Feltham Neighbourhoods preferred policy option.	Comment noted.

<b>WoB P2 Bedfont Lakes Neighbourhoods</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
Greater London Authority (Government)	The Mayor objects to the de-designation and development of the Bedfont Lakes Place site in the Green Belt and in line with TfL's comments, the importance of the southern rail access proposal to the delivery of the proposed new homes and employment in the west of the borough is not made clear. Development at higher density on non-GB land would be welcomed	Objection noted. The Council views the delivery of strategic transport infrastructure such as the SRA link an exceptional circumstance in which to release land for delivery of housing and the accommodation of rail infrastructure. Densities proposed in the WoB Local Plan review policies have been design tested to ensure they are appropriate for the neighbourhood context.
Windowflowers Ltd (Company)	We are of the view that our client's site should be allocated as a part of a residential led 'mixed use' scheme as delineated at Appendix 1 [missing from submission]. One option is that the proposed 'Lakeview' Neighbourhood as set out within the Opportunity Capacity Study (2016) should be included within the draft West of the Borough Plan as a wider mixed-use allocation in line with the provisions of draft policy P2. Release of our client's site as proposed would help to maximise	Comments noted. The Council views the current application of a hotel at the north eastern extent of the land parcel and improvements to the green belt land as appropriate for this site. The capacity study was an optioneering exercise in order to understand the full scope of possibilities across the WoB area, however site constraints in this area limit the possibility of delivering

<b>WoB P2 Bedfont Lakes Neighbourhoods</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>development opportunities and to promote flexibility in the Plan delivery. The Council have failed to sufficiently justify not taking on the full recommendations of the Capacity study, resulting a draft Plan which is not consistent with its evidence base. We would welcome the opportunity to meet with officers to discuss the same. In assessing this alternative policy option we would draw attention to the over reliance on the Southern Rail Access and the lack of consideration paid to other factors which justify significant growth and development within this part of the borough. In relation to access and transport, the Council's alternative policy option was clearly pragmatic and positive, and we would urge the Council to take the same approach to all policies and place policies should the railway not be forthcoming. We support the principles of the draft West of the Borough Plan and associated policies. However, we would ask that the Council review the merits of allocating our client's site, in whole, as part of a wider mixed use allocation. This will further assist the Council in meeting their aspirational development targets, secure flexible and deliverable land allocations and support wider investment into improvements into local infrastructure.</p>	<p>mixed use on this site. The Council has taken into account the feasibility of the SRA link in the Regulation 19 Draft Local Plan review in Bedfont Lakes Place Policy P2 and Policy WOB5 Transport and Connectivity. The Council views the current application of a hotel at the north eastern extent of the land parcel and improvements to the green belt land as appropriate for this site.</p>
C. Hern (Individual)	<p>The proposals continue to include housing development with an access road on the open space between Sandy Drive and the Grove Village houses off Kinross Road. This estate was designed as a garden village with attractive terraces of houses some looking out over this open space. The new development, whether flats or houses would be grossly intrusive, destroying the environmental quality of the area and these houses in particular. In earlier schemes, including the council's 'Concept Plan' this proposed Bedfont Lakes development had some coherence, with a single local town centre. The site chosen for this centre had approval for a massive new industrial/warehouse complex, and there is now only to be a couple of small shop groups, or 'community spaces. The completed warehouse complex now dominates the surrounding green belt area- and the name 'Heathrow Logistics Park' expresses a similar dominance. The value of this area as Green Belt is diminished, but although an area of open space including a large lake surrounds it, giving some separation from housing, the environmental attractiveness</p>	<p>Comments noted. The Council views the current proposal for new housing and community space at Bedfont Lakes neighbourhoods maximises the delivery of family housing while improving the quality of open space given site constraints such as the Heathrow Logistics Park</p>

<b>WoB P2 Bedfont Lakes Neighbourhoods</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	of any new residential enclaves will also be poor. This problem is ignored in the draft plan, which has the grace to include 20% of the new homes as houses. The Lower Feltham West block is isolated and unrelated, and takes over part of an attractive Park	
Heston Residents' Association	The respondent does not agree with the approach set out in the Bedfont Lakes Neighbourhoods preferred policy option and suggests that there may be other land uses that could be supported in this place, however no examples are given.	Comment noted
Hounslow Cycling (Charity)	Hounslow Cycling is keen that the recently installed greenway routes are retained when new residential areas are built north of Bedfont Lakes.	Comment noted and reflected in the Bedfont Lakes Neighbourhood Policy P2 where applicable
London Diocesan Fund (Company)	London Diocesan Fund agrees with the approach set out in the Bedfont Lakes Neighbourhoods preferred policy option.	Support welcomed
R. Clarke (Individual)	The respondent agrees with the approach set out in the Bedfont Lakes Neighbourhoods preferred policy option.	Support welcomed
G. Pollitt (Individual)	The respondent agrees with the approach set out in the Bedfont Lakes Neighbourhoods preferred policy option.	Support welcomed
Boundaries Road Residents Association (Community organisation)	Boundaries Road Residents Association agrees with the approach set out in the Bedfont Lakes Neighbourhoods preferred policy option.	Support welcomed
S. Ambrose (Individual)	The respondent agrees with the approach set out in the Bedfont Lakes Neighbourhoods preferred policy option.	Support welcomed
Noyces Funfair (Company)	The respondent agrees with the approach set out in the Bedfont Lakes Neighbourhoods preferred policy option.	Support welcomed

<b>WoB P3 Heathrow Gateway</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
Greater London Authority (Government)	The Mayor objects to the de-designation and development of the Heathrow Gateway site in the Green Belt and in line with TfL's comments, the importance of the southern rail access proposal to the delivery of the proposed new homes and employment in the west of the borough is not made clear	Objection noted. Paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. The Council views the delivery of strategic transport infrastructure such as the Southern Rail Access link an exceptional

<b>WoB P3 Heathrow Gateway</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
		circumstance with enabling development to help meet our objectively assessed need for homes and employment. Densities proposed in the WoB Local Plan review policies have been design tested to ensure they are appropriate for the neighbourhood context.
Friends of the River Crane Environment (Charity)	The quantum of new open space proposed in Figure 5.7 (p105) is minuscule, in relation to both the quantum of Green Belt proposed for de-designation and the quantum of housing development proposed. As elsewhere in the WoBP, there are no specifics as to how the existing open spaces will be enhanced, nor how both new and existing open spaces will be managed. Several of the proposed pedestrian/cycle routes appear not to network with anything.	Commented noted, policies have been amended to include recommendations from Colne and Crane Valleys GI Strategy.
C. Hern (Individual)	These proposals are on land with clear Green Belt value, and lack realism- In what sense is the site a 'gateway' to the Airport. I would argue that this not an appropriate location for a 20 storey hotel, or 2,100 homes in 10 storey flats, albeit with a school and small park. There are issues of noise and air pollution- and is the A30 underpass capable of accommodating the traffic coming in from various directions? This Gateway's shopping centre will very likely be an even more attractive retail location than Sunbury Cross centre. Any additional housing in these areas should be designed as natural extensions to Feltham and Bedfont. Issues of traffic congestion and air quality should be fully addressed and the provision of community infrastructure, for health and community facilities. It is not good enough to assume that open space can be used for schools or private sports; The impact on Bedfont centre should also be assessed. There may be Green Belt land better located for access and town centre proximity, Including 15Ha off Felthambrook Way. It is clear that the employment locations, and with it housing for workers, has been designed with the needs of Heathrow Airport at centre stage, and not the existing or future residents of Feltham and Bedfont	Comment noted, Paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. The Council views the delivery of strategic transport infrastructure such as the Southern Rail Access link an exceptional circumstance with enabling development to help meet our objectively assessed need for homes and employment. The Heathrow Gateway Place polices have been amended following extensive engagement with community organisations, residents, businesses, landowners and key stakeholders. The place policy includes provision for local amenities such as small shops and cafes, well-defined pedestrian and cycle greenways and enhanced open spaces and sports and recreational facilities.
Airport Industrial Property Unit Trust (Company)	Notwithstanding AIPUT's proposals set out in the previously 3.7 submitted representations (see Appendix 2), the Preferred Options WoBP does not propose to de-designate and allocate the Green Belt	Comment noted, the Heathrow Place polices have been amended following extensive engagement with community organisations, residents, businesses,

WoB P3 Heathrow Gateway		
Respondent	Representation Summary	Council Response
	<p>land within the eastern section of the CSC for employment use as part of the Cargo Service Centre LSIS. The land is instead proposed for de-designation from the Green Belt as part of the general safeguarding for the 'Heathrow Gateway' scheme. The proposed de-designation for safeguarding is shown in Figure 3.3 below (extract from the Preferred Options WoBP – Figure 4.9). The land within the CSC site does not appear to serve any purpose as part of Heathrow Gateway scheme and it is not clear why it has been safeguarded. The spatial strategy for the Heathrow Gateway scheme (see Figure 3.4 at Appendix 4) does not set out any proposals for the land within the CSC site. The spatial strategy merely states the context of the eastern section of the CSC site is 'open space'. However, this is inconsistent with the actual status of the site, which, as previously stated, forms parts of an operational industrial site (the CSC site) and comprises predominantly of HGV and car parking areas, enclosed by mature belts of protected trees. AIPUT has not been consulted regarding the proposed safeguarding and, as previously stated, has its own development aspirations for the eastern section of the CSC site. Representations have previously been submitted on AIPUT's behalf, proposing that the land is removed from the Green Belt and allocated for employment use in its own right.</p>	<p>landowners and key stakeholders such as Heathrow, and a Statement of Common Ground will be produced to reflect this working.</p>
Harleyford Aggregates Limited (Company)	<p>Mayfield Farm in the London Borough of Hounslow contains an economically viable resource of construction aggregates. Construction aggregates are being extracted at the adjacent landholding, Homers Farm in Surrey, by HAL. According to LBH's MBR (2011) mineral extraction at Mayfield Farm would not be feasible unless Homers Farm and Mayfield Farm were worked together. The adopted Local Plan safeguards the minerals at Mayfield Farm in accordance with the NPPF, London Plan and Local Plan Policy. The emerging LBH Local Plan considers the potential for development of Mayfield Farm as described in P3 Heathrow Gateway but it does not acknowledge the safeguarded status of the mineral resource, contrary to the requirements of the NPPF, the London Plan and LBH's own adopted Local Plan Subject to prior extraction of the aggregate resource in advance of any form of development (which in our view is entirely feasible) and also in</p>	<p>Commented noted, the place policy has been amended to include extraction of the aggregate resource in advance of any form of development</p>

<b>WoB P3 Heathrow Gateway</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	compliance with the NPPF, the London Plan and the adopted Local Plan all uses being contemplated by LBH at P3 Heathrow Gateway would seem appropriate. However, should any development proposed at Mayfield Farm sterilise the mineral resource then that development would be inappropriate.	
Heston Residents' Association (Community organisation)	The Heston Residents' Association does not agree with the approach set out for the Heathrow Gateway preferred policy option and suggests that other land uses could be supported in this place, however no examples are provided.	Comment noted. The Heathrow Gateway Place policies have been amended following extensive engagement with community organisations, residents, businesses, landowners and key stakeholders. The place policy includes provision of new homes, jobs, local amenities such as small shops and cafes, well-defined pedestrian and cycle greenways and enhanced open spaces and sports and recreational facilities
London Diocesan Fund (Company)	London Diocesan Fund agrees with the approach set out for the Heathrow Gateway preferred policy option	Support welcomed
R. Clarke (Individual)	I am concerned about the air quality in this location for a primary school. I'm also concerned about the location of the station above the road, and the impact on the junction and the Bedfont Conservation Area. I'm also concerned about important archeological sites in this location. These developments are likely to add to congestion in this area. The respondent suggests other land uses that could be supported in this place should include open space.	Comment noted. The Heathrow Gateway Place policies have been amended following extensive engagement with community organisations, residents, businesses, landowners and key stakeholders. The place policy includes homes, jobs, local amenities such as small shops and cafes, well-defined pedestrian and cycle greenways and enhanced open spaces and sports and recreational facilities. The school is no longer proposed for this site. Any development would need to take full account of the Archaeological Priority Area designation and the Scheduled Ancient Monument and be undertaken in accordance with relevant policy protecting these heritage assets.
G. Pollitt (Individual)	The respondent agrees with the approach set out for the Heathrow Gateway preferred policy option	Support noted
Boundaries Road Residents Association (Community organisation)	Boundaries Road Residents Association agrees with the approach set out for the Heathrow Gateway preferred policy option	Support noted
S. Ambrose (Individual)	The respondent agrees with the approach set out for the Heathrow	Support noted

<b>WoB P3 Heathrow Gateway</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	Gateway preferred policy option	
Noyces Funfair (Company)	The respondent agrees with the approach set out for the Heathrow Gateway preferred policy option and suggests that other land uses could be supported in this place, however no examples are provided.	Support noted. The Heathrow Gateway Place policies have been amended following extensive engagement with community organisations, residents, businesses, landowners and key stakeholders. the place policy includes provision of new homes, jobs, local amenities such as small shops and cafes, well-defined pedestrian and cycle greenways and enhanced open spaces and sports and recreational facilities

<b>WoB P4 Airport Business Park</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
Greater London Authority (Government)	The Mayor objects to the de-designation of the Airport Business Park site from the Green Belt.	Comment noted, the Council notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential

WoB P4 Airport Business Park		
Respondent	Representation Summary	Council Response
		sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow with or without a third runway and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. The Airport Business Park site would offer good access to the airport, the national motorway network and London's strategic road network. The adjacent Piccadilly Line tube station and local bus services would offer public transport choices for the local workforce. The site would be capable of becoming a major logistics hub, handling air cargo and freight, and it could also accommodate other light industrial businesses with a range of unit sizes providing over 3,800 new jobs
Friends of the River Crane Environment (Charity)	FORCE supports the creation of "easily navigable pedestrian and cycle routes through the site to connect to...the Crane River Corridor, the Duke of Northumberland's River and associated open spaces" (p109). FORCE would like recognition that the River Crane, the Duke of Northumberland's River and the Longford River themselves all "offer public transport choices for the local workforce" (p106) through investment in improved cycling facilities along their lengths adjacent to the Airport Business Park. An improved River Crane cycleway would link to the Pedestrian/Cycle route (shown in Figure 5.10) to Hatton Cross Public Transport Interchange, which is proposed as the focus for the Airport Business Park (p110). This is less than half a mile from the Crane. FORCE would also like recognition that the above-noted	Comment noted and aspect of these recommendation has been taken forward in the plan

WoB P4 Airport Business Park		
Respondent	Representation Summary	Council Response
	severance issues for the River Crane at the A312, A30 and A4 should be resolved as part of any de-designation of Green Belt and investment in the Airport Business Park. FORCE supports the proposals for “Protecting and enhancing the environmental quality and the biodiversity value of adjacent Site of Importance for Nature Conservation etc” (p110).	
C. Hern (Individual)	<p>This seems to be a massive land take for the proposed floorspace. Within Heathrow there are perhaps more than 25 Hectares of ground level parking on sites around the perimeter roads, with immediate access to the terminals and freight handling locations. Rather than extend out into Green Belt land these should be regarded as brownfield sites, suitable for intensification. These areas should be developed in turn for the needed industrial/warehousing development, with car parking for airport use installed on the roof, over two levels if necessary. This Business park site is acknowledged in the Arup study to make a Green Belt landscape value contribution, and if Arup and the council planner’s claim that Heathrow is continuous with the London built up area is rejected, a site visit will demonstrate the value as a separation to prevent the merging of Bedfont and Heathrow – part of Heathrow’s green environmental circle. The proposed warehousing units would dominate the open space along the DNR- one corner coming threateningly close-, and the residential area beyond. The new open spaces shown on the plan are of little use, and if there is to be development on this site it should be significantly reduced, and limited to the northern corner between existing industry and the main road. Any additional warehousing outside the perimeter for cargo handling should be on the west side of the airport, closer to the Colnbrook rail bridgehead, to ensure intermodality.</p>	<p>Comment noted, the Council notes that paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. A judgement of the benefits and disbenefits to sustainable development has been an intrinsic part of the process. In arriving at the respective conclusions on these various parcels and the need for Green Belt alterations, the Council has carried out an extremely thorough and robust exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need. Were Green Belt alterations not to be taken forward, it would mean the Council would be unable to fully meet its development requirements for employment land or fully capture the advantages to the local economy of Heathrow with or without a third</p>

WoB P4 Airport Business Park		
Respondent	Representation Summary	Council Response
		runway and this would be likely to cause harm to the local economy and to miss out on potential jobs growth opportunities. The Airport Business Park site would offer good access to the airport, the national motorway network and London's strategic road network. The adjacent Piccadilly Line tube station and local bus services would offer public transport choices for the local workforce. The site would be capable of becoming a major logistics hub, handling air cargo and freight, and it could also accommodate other light industrial businesses with a range of unit sizes providing over 3,800 new jobs
SEGRO (Company)	The proposed Airport Business Park benefits from an excellent location that can provide a major logistics hub adjacent to Heathrow Airport to cater for the forecast growth in air cargo and the West London market more generally. The proposed uses for the Airport Business Park include employment activities within the 'B Class' uses, sui generis uses and ancillary development to support the overall development function of the Site. These proposed uses are supported. Site B, as shown in the accompanying Masterplan Brief (May 2017) (Appendix 2), falls within the Airport Business Park. Specialist market agent advice received from Colliers International and Savills confirms that Site B has good potential for industrial development and there is likely to be strong demand for Grade A units at this location. Accordingly, the Masterplan Vision (November 2017) (Appendix 3) shows how Site B has the potential to deliver these uses comprising a substantial floor area of high quality industrial buildings in a variety of potential site layouts and units sizes to maximise employment opportunities and commercial appeal. At the same time, it also provides a high quality environment through the provision of on-site mitigation in the form of structural landscaping and landscaped corridors for screening; planted bunds and acoustic barriers; habitat creation for net gains in	Comments noted. The Employment Land Review identifies a significant need for industrial land in the West of the Borough, and has identified these sites to meet these specific Objectively Assessed Needs and allocated them for flexible industrial uses appropriate to fulfil this.

WoB P4 Airport Business Park		
Respondent	Representation Summary	Council Response
	<p>biodiversity and a footway/cycleway to encourage more sustainable modes of transport. The principle of the Airport Business Park is supported as it would provide much-needed industrial and warehousing capacity for the Borough in a sustainable location in close proximity to the Heathrow Cargo Centre; thus forming an important cluster of industrial uses with other nearby occupiers, including those at Radius Park. SEGRO disagree with the extent of the Airport Business Park boundary and believe it should be extended to include Site A. Site A has been re-designated as Metropolitan Open Land, but Barton Willmore's assessment of it against the criteria in Policy 7.1 7 of the London Plan concludes that it does not perform its functions (see response to Question 15 for greater detail). Consequently, the Masterplan Vision (Appendix 3) highlights that Site A has the potential for a low-occupancy warehouse storage use which could complement the more intensive employment-generating uses on the remainder of the Airport Business Park. This would provide useful ancillary space that would otherwise have to be accommodated within the Airport Business Park. As such, the allocation of Site A would free-up land for more intensive employment-generating uses in other nearby premises outside the PSZ on the Airport Business Park, whilst respecting the restrictions of Circular 01/2010. This would represent a less efficient use of land, particularly so close to Heathrow where industrial land is in high demand. The draft Policy identifies that economic growth will be optimised by securing at least 145,000m<sup>2</sup> of industrial floorspace and designating the Airport Business Park as a LSIS, which is supported. SEGRO would be willing to work in partnership with other landowners to masterplan the Site and ensure the optimal use of the whole site for employment activities. Land at Dick Turpin Way</p> <p>SEGRO support the allocation of Site C (Land at Dick Turpin Way) for emp</p>	

<b>WoB P4 Airport Business Park</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>employment land but consider the range of uses that could come forward at the Site should be broadened to include car showrooms, drive thru uses and trade counter uses to reflect its prominent frontage location and excellent access to the strategic road network. This view is supported by the Commercial Market Assessment set out in the Masterplan Brief (Appendix 2) underpinned by specialist market agent advice received from Colliers International and Savills. The Masterplan Vision (Appendix 3) provides an indicative layout showing the disposition of uses across Site C and how these could sit alongside one another. Providing this flexibility, in terms of uses, reflects the aim of promoting a mix of employment uses under optimising employment growth. In summary, SEGRO consider that the acceptable uses at Site C should be A1/B1c/B2/B8/Sui Generis uses.</p>	
Heston Residents' Association (Community organisation)	Heston Residents' Association do not agree with the approach set out for the Airport Business Park preferred policy option and suggests that there other land uses that could be supported in this place, however no examples are provided.	Comment noted
LB Hounslow Public Health (Government)	LB Hounslow Public Health agree with the approach set out for the Airport Business Park preferred policy option	Support welcomed
Hounslow Cycling (Charity)	As the land adjacent to Hounslow Urban Farm is transformed to Industrial Use, the flow of heavy goods vehicles onto this land is likely to increase. The existing greenway cycle routes must be protected as clear routes between Hatton Cross and Feltham Railway Station. Developers must provide top quality protection for cyclists and pedestrians if new access roads are built.	Comment noted and approach taken forward in the plan
London Diocesan Fund (Company)	London Diocesan Fund agree with the approach set out for the Airport Business Park preferred policy option	Support welcomed
R. Clarke (Individual)	The respondent does not agree with the approach set out for the Airport Business Park preferred policy option and considers that this site could accommodate some residential development in the Southern end. The respondent raises concern around the increase in numbers of logistics companies due to operators using the A312 which would add to congestion and air quality impacts. The respondent does not see this as viable and consistent with additional air quality impacts from a third	Comment noted. The Council consider that this site is suitable for Industrial uses due to its proximity to Heathrow and its access to the national and strategic road network, as well as Heathrow Airport's Perimeter Road

<b>WoB P4 Airport Business Park</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	runway. The respondent suggests residential development should be supported near the Duke of Northumberland's River	
G. Pollitt (Individual)	The respondent agrees with the approach set out for the Airport Business Park preferred policy option	Support welcomed
Boundaries Road Residents Association (Community organisation)	Boundaries Road Residents Association agree with the approach set out for the Airport Business Park preferred policy option	Support welcomed
S. Ambrose (Individual)	The respondent agrees with the approach set out for the Airport Business Park preferred policy option	Support welcomed
Noyces Funfair (Company)	The respondent agrees with the approach set out for the Airport Business Park preferred policy option	Support welcomed

<b>WoB P5 Cranford and Heston Neighbourhoods</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
Greater London Authority (Government)	Cranford and Heston Place Policy Hounslow needs to give full consideration to the potential exposure to poor air quality when allocating housing adjacent to major roads	Comment noted. Policies WoB3 and P5 have of the draft submission WoB Plan has been prepared in accordance with draft London Plan policy SI1 and aim for the area to become Air Quality Positive through implementing measures that will actively reduce air pollution within the opportunity area.
Friends of the River Crane Environment (Charity)	Any development or regeneration of Cranford will increase the amenity value of Avenue Park as open green space for residents. Improving connectivity of open spaces, in particular by solving the severance of the River Crane corridor by the A4, would play a major part in regenerating Cranford. Connectivity would also be improved by overcoming the severance posed by the A312 to link Cranford and Avenue Park eastwards with the proposed new park at Rectory Farm. To this extent, FORCE is pleased to note that Figure 5.12 shows Pedestrian/Cycle crossings of the A4 and A30, and would welcome detail as to the practical proposals here. Improved pedestrian and cycle links northwards would also benefit Cranford residents, enabling links	Support noted. Practical or technical details of proposed links shown in the plan will be assessed as part of planning applications and associated masterplan studies. The Local Plan Review provides a strategic policy framework to support the implementation of these links.

<b>WoB P5 Cranford and Heston Neighbourhoods</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	with the Grand Union Canal towards Paddington and Brentford as well as removing a further restriction in movement along the Crane valley corridor towards Minet Country Park.	
Cranford Park Friends (Community organisation)	Any development or regeneration of Cranford will increase the amenity value of Avenue Park as open green space for residents. Improving connectivity of open spaces, in particular by solving the severance of the River Crane corridor by the A4, would play a major part in regenerating Cranford. Connectivity would also be improved by overcoming the severance posed by the A312 to link Cranford and Avenue Park eastwards with the proposed new park at Rectory Farm. There is a missed opportunity in not enhancing and 'greening' the route of the London Loop so that walkers do not have to walk long distances alongside roads (including the busy Bath Road) between River Crane Park and Cranford Park. (See: <a href="http://content.tfl.gov.uk/london-loop-section-10.pdf">http://content.tfl.gov.uk/london-loop-section-10.pdf</a> ).	Comment noted. The Cranford and Heston Place Policy identifies the need to improve connectivity of open spaces through enhancing walking and cycle routes, which connect the existing river corridor to other green spaces, such as Airlinks Golf Course and Osterley Park and to the national cycle route along the Grand Union Canal.
Queens Park Rangers Football Club (Company)	QPR is supportive of and wishes to contribute to regeneration in Cranford and Heston as set out in Policy P5. We are particularly supportive of sub-paragraph (s)-(u) which promote active living through the provision of built and outdoor community space, enhanced community health and wellbeing and residents quality of living. Designations on Figure 5.12 reflecting these aspirations would be a welcome addition to the Draft Local Plan.	Support noted.
Cranford Community College (Non-profit organisation)	Cranford Community College is supportive of, and wishes to contribute to, regeneration in Cranford and Heston as set out in Policy P5. We are particularly supportive of sub-paragraphs (s) – (u), which promote active living through the provision of built and outdoor community space, enhanced community health and wellbeing and residents' quality of living. Designations on Figure 5.12 reflecting these aspirations would be a welcome addition to the Draft Local Plan. Cranford Community College is one of the most successful community facility in the London Borough of Hounslow. It has built a sustainable model which enables thousands of community users a week to use the excellent facilities.	Support noted.
T. Henderson (Individual)	Policy should include the provision to extend CS9 to the Central Terminal Area of Heathrow probably via Cranford and the Bath Road.	Comment noted. The central terminal area of Heathrow, along with the entire airport area lies beyond the

<b>WoB P5 Cranford and Heston Neighbourhoods</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
		boundaries of the London Borough of Hounslow. The Council continues to engage with Heathrow and TfL in order to support enhanced active travel options to and from the airport.
London Diocesan Fund (Company)	The respondent agrees with the approach set out for this preferred Cranford and Heston Place policy option.	Support welcomed
G. Pollitt (Individual)	The respondent agrees with the approach set out for this preferred Cranford and Heston Place policy option.	Support welcomed
Boundaries Road Residents Association (Community organisation)	The respondent agrees with the approach set out for this preferred Cranford and Heston Place policy option.	Support welcomed
S. Ambrose (Individual)	The respondent agrees with the approach set out for this preferred Cranford and Heston Place policy option.	Support welcomed
Noyces Funfair (Company)	The respondent agrees with the approach set out for this preferred Cranford and Heston Place policy option and considers that there are other sites that could be developed but does not give any examples here.	Comment noted

<b>WoB IIA, Supporting Documents and Misc.</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
Windowflowers Ltd (Company)	"[Figure 0.02 on page 6] is noted to seek to define the boundaries of the West of the Borough Plan Area. It is assumed that these have been set taking account of the feedback received in this regard to earlier consultations on the draft plan; albeit we would seek confirmation from the Council as to how previous representations had been assessed and what influence previous submissions have had on the final proposal plan area. It would have been helpful if the plan could have been overlaid onto an OS Map to ensure sufficient clarity as to the location of the plan area boundaries, in circumstances where as prepared it is a little ambiguous and could be open to challenge or misinterpretation. Figure 4.1, p. 40. It is noted from the plan extract included above that	Comment noted. The boundary is set out in the main map of the WoB area in the introduction to the Plan.

WoB IIA, Supporting Documents and Misc.		
Respondent	Representation Summary	Council Response
	our clients land as delineated at Appendix 1 [missing from submission] will be partly retained as Green Belt land, with the residual land being classified as 'white land'. In short, this retains the current planning policy framework. However, clarification is sought from the Council as to why the decision has been taken not to seek to allocate the land delineated at Appendix 1, in whole, for a residential led mixed use scheme on what is a previously developed site."	
Friends of the River Crane Environment (Charity)	Delivery and Monitoring "Planning Obligation (Section 106)" (p124) should explicitly recognise that the provision and management of green infrastructure and open spaces is also an important role for S106 funding.	Comment noted. Developers contributions will be sought to fund most of the infrastructure projects in this plan and this is set out in amended policy WoB7 in the draft submission version of the Plan.
C. Hern (Individual)	I asked for specific policies to redress these disparities, and was told that a 'West' plan was to be proposed. With the release of the small area 2011 census statistics this imbalance was fully demonstrated. The west of the borough is characterised by a high number of workers in routine or semi-routine occupations and poor educational attainment. Both in representations and at the Local Plan Hearing I have asked that the West plan should aim for a greater diversity in employment opportunities, and work with local firms to develop further the media and IT industries based in Feltham. I also forced into the Local Plan, with the assistance of the Inspector, an ambition to provide a technical further education establishment in Feltham. The draft West of Borough Plan fails to meet these objectives. The additional industrial land is for logistics and services related to Heathrow, simply perpetuating and increasing the lack of diversity, already affected by the loss of offices to residential in Feltham and Hounslow. This is simply not building a balanced community. The possibility of a further education establishment, the need for which is even more acute, has not been fully pursued, and no site has been identified in the plan. An obvious site would be on the western end of the Marshalling Yards, suggested in the plan for housing. This site is close to the town centre, has good public transport, and connects to the main cycle routes along the Crane valley and the Superhighway. Heathrow have established a technical/ apprentice academy on the north side of the airport, and clearly this	Comment noted, some of these recommendations have been taken forward in the plan.

WoB IIA, Supporting Documents and Misc.		
Respondent	Representation Summary	Council Response
	should be relocated into Feltham.	
R. Clarke (Individual)	Hanworth has not been included - and the Feltham description includes parts of Hanworth. This is a major omission - and undermines the credibility of the review. Hanworth needs to be considered separately. Feltham East is not in the East - and should have a name that reflects its history and heritage. Hanworth Park House has not been considered - this should be the starting point for redevelopment of this MOD site. Hanworth Road character area should have additional protection. Any development around the station needs to reflect the 'village character' of the area. More needs to be done to make the high street suitable for children - wider footpaths and places for incidental play - including around Feltham Pond. Currently there is a no-dog area, which the Council is proposing removing - some gated area which is kept clear of dogs and wildfowl is needed, as well as other features to encourage play and for families to spend time in the space. Community plans for Bridge House Pond should be taken forward. A wall of fame mural of Freddie Mercury should be considered (similar to the Mo Farah mural), as well as a statue. More parking at Feltham Assembly Hall to encourage Feltham Park to become a destination for people to spend a number of hours.	Comment noted, some of these recommendation have been taken forward in the plan
G. Pollitt (Individual)	The respondent considers that there are additional places that could be added to better reflect existing character areas or respond to regeneration and future development but does not provide any further examples.	Comment noted
T. Howe (Individual)	The respondent considers that there are additional places that could be added to better reflect existing character areas or respond to regeneration and future development: St. Dunstan's Conservation Area.	Comment noted. The conservation area appraisals in the West of Borough have been used to inform the design and heritage policies
S. Ambrose (Individual)	The respondent considers that there are additional places that could be added to better reflect existing character areas or respond to regeneration and future development: Hanworth park house restoration.	Comment noted and recommendation taken forward
Natural England (Government)	In our review of the West of Borough Plan and Integrated Impact Assessment (IIA) we note that planned residential development in the Feltham and Heathrow Gateway sub-areas may have the capacity to	Comments noted, the draft submission version of the Plan is supported by an updated IIA and HRA and the comments raised have been taken into account during

WoB IIA, Supporting Documents and Misc.		
Respondent	Representation Summary	Council Response
	<p>result in increased vehicle movements in the vicinity of Staines Moor Site of Special Scientific Interest (SSSI) and possibly also Kempton Park Reservoir SSSI – which both form part of the South West London Waterbodies Special Protection Area (SPA), however this has not been taken into consideration in the IIA. It may also result in added recreational pressure at these sites. Whilst air pollution in the area is already a major problem due to the presence of Heathrow Airport, further deterioration in air quality should be avoided if possible. Supplementary Advice for the SPA states that <i>'the structure and function of habitats which support this SPA feature [Gadwall] may be sensitive to changes in air quality'</i>. 'Please ensure that any revised draft of the IIA incorporates these considerations in order to be deemed comprehensive. Please also ensure that any revised version of the Plan demonstrates that available traffic modelling data has been used to i). Estimate baseline traffic flow along roads major roads within 200m of the SPA, ii). Calculate predicted additional vehicle movements along these roads as a result of the proposed development within the plan, and iii). Propose suitable measures to mitigate for any air pollution related impacts on these sites as a result of the planned development. The IIA indicates that proposed development in Bedfont Lakes near supporting habitat for Staines Moor SSSI may have affect the integrity of the SSSI/SPA. Here, the IIA could be more specific and describe potential impacts relating to the resilience of the populations of overwintering birds (Shovler and Gadwall) that the site supports through additional human disturbance or alterations to bird flight paths. Supplementary Advice for the site states that <i>'The nature, scale, timing and duration of some human activities can result in the disturbance of birds at a level that may substantially affect their behaviour, and consequently affect the long-term viability of the population'</i>. Please note that development which may negatively affect the integrity of the interest features of an SPA should not normally be permitted, and the Council should therefore consider appropriate mitigation options for impacts arising from allocated sites within the Bedfont Lakes area, and consider the suitability of allocating these sites, given that they may not</p>	<p>the preparation of these reports. Place policies and strategic policy WoB4 have been amended to reflect the need to ensure that development in these areas conserves biodiversity and results in a net gain in biodiversity wherever possible.</p>

WoB IIA, Supporting Documents and Misc.		
Respondent	Representation Summary	Council Response
	<p>be deliverable without suitable mitigation.</p> <p>The IIA also indicates that the proposed allocations in both the Heathrow Gateway and Airport Business Park sub-areas will result in the loss of a significant area of agricultural land. Based on pre-1988 surveys this land is likely to be either grade 1 or 2, and is therefore high quality. Whilst this data is old, in the absence of more recent surveys, a precautionary approach should be adopted and the loss of agricultural land minimised through these developments as far as possible. This would be in accordance with Paragraph 112 of the NPPF which states that <i>'Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality'</i>.</p> <p>We also note that due to the biodiversity sensitivities in the Heathrow Gateway, Bedfont Lakes, Feltham and Airport Business Park sub-areas, additional wording should be incorporated into the place policies to ensure that development in these areas conserves biodiversity and results in a net gain in biodiversity wherever possible. This would be in conformity with Paragraph 109 of the NPPF.</p>	
Environment Agency (Government)	<p>Flood Risk and Climate Change</p> <p>Although the River Crane Corridor is identified, quite correctly 7.25, Climate Change , there is no mention of protecting or improving the quality/condition of this asset via</p> <p>i) London plan, Blue Ribbon network from the London Plan (2011) and the updated and recently revised version (2015).</p> <p>ii) Water Framework Directive &amp; River Basin management Plans</p> <p>You should include a reference to the work and projects of the Crane Valley Partnership in order to further promote improvements to maximise the use of the river corridor.</p> <p>The Crane Valley Partnership (CVP) is collaboration between charities, community groups, borough councils, private businesses &amp; government agencies in the five boroughs that border the River Crane (London</p>	<p>Comments noted, the draft submission version of the Plan is supported by an updated IIA and the comments raised have been taken into account during the preparation of this report. The Council has been working with Thames Water to understand the potential impacts of development growth upon water quality and waste water infrastructure.</p>

WoB IIA, Supporting Documents and Misc.		
Respondent	Representation Summary	Council Response
	<p>Boroughs of Harrow, Hillingdon, Ealing, Hounslow and Richmond-upon-Thames).</p> <p>The Partnership aims to restore one of London’s most natural rivers, conserve its surrounding habitats and improve public access so that its nearby communities can enjoy contact with the natural world.</p> <p>We encourage the “Securing enhancements to the Longford River corridor through de-culverting and naturalisation, and the creation of a path alongside the waterway” in Feltham.</p> <p><b>Water Quality</b></p> <p>We are pleased to see that our suggestion that ‘water quality’ is added to the list of indicators has been added. This objective could also pull together indicators relating to rivers, water quality (both ground and surface water), sustainable drainage, flood risk, and biodiversity, reflecting the requirements of the WFD and Thames RBMP.</p> <p>‘Water quality’ and the provision of infrastructure for wastewater is listed as one of the strategic priorities that should be considered in Local Plans (see NPPF paragraph 156). Local Authorities should work with providers to assess the quality and capacity of infrastructure for water supply, wastewater and its treatment (NPPF paragraph 162).</p> <p>London Plan policy 5.14 ‘Water quality and wastewater infrastructure’ requires Local Authorities to ‘identify infrastructure requirements’ for Local Plans. The Thames River Basin Management Plan provides the evidence for the current status of waterbodies in the Thames catchment, and sets the overarching objectives and measures for reaching the Water Framework Directive targets.</p> <p>We strongly recommend you liaise with Thames Water from the earliest opportunity to ascertain whether there is enough capacity in the existing sewerage network and wastewater treatment works to serve the amount of growth and development in your borough. Additional capacity may be required to serve increased housing numbers. Where this is the case Local Authorities should work with water companies, neighbouring boroughs and us to understand the potential impact increased development would have on the receiving water</p>	

<b>WoB IIA, Supporting Documents and Misc.</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>environment, and the practicalities for Thames Water to provide the necessary upgrades.</p> <p>We recommend any assessments of infrastructure requirements are evidenced and the recommendations inform your Sustainability Appraisal (or SEA/IIA), Local Plan policies and strategic allocations. If it's not clear how water quality and infrastructure requirements for growth have been assessed with evidence and there are concerns around potential water quality impacts, we may find the plan unsound.</p>	

<b>WoB Site Allocations</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
Greater London Authority (Government)	<p>Site Allocations The Mayor objects to the allocation of GB, allotments and open spaces for development. The Mayor objects to the allocation of GB, allotments and open spaces for development – see comments above Site Vantage Park/Heathrow Causeway needs to ensure that the GB element is protected and not built on and its integrity preserved. The draft documents should reflect the Mayor's strategic housing target of 50% affordable housing and include the threshold approach starting at 35% affordable housing, without subsidy. Evidence suggests this will deliver more affordable housing overall. The draft DPDs should note that the emerging London Plan sets a 50% target, without subsidy for public land and industrial sites considered appropriate for release. The allocation of industrial sites for other uses needs to be justified. Co-location on existing non-designated industrial sites, and not just redevelopment for housing should be considered eg 61 Fern Grove, Bridge Road Depot (valuable yard space), Travis Perkins Stains Road.</p>	<p>Comments noted. The Plan has been amended to ensure it is in general conformity with the London Plan and as far as possible the Draft London Plan, including the specific requirements regarding affordable housing. The council has considered the proposed amendments and has removed Heathrow Causeway Centre from allocation. The plan fully explores opportunities for industrial intensification through the Site Allocations and Capacity Review (SAC) 2019 and considers that the industrial sites in the West of Borough but are not in areas where it would be viable to deliver co-location of uses.</p>
Be Living (Company)	<p>Be Living supports the new site allocations which are included, and makes specific comments on the following sites: Nene Gardens: Be Living supports the allocation of this site and the removal of its allocation as Local Open Space. It is considered that the site is available in the short term, although we note that the existing lease has</p>	<p>Comments noted. The council has considered the proposed amendments to site allocations and has made adjustments where considered appropriate to the aims of the plan.</p>

WoB Site Allocations		
Respondent	Representation Summary	Council Response
	<p>approximately 18 months to run. Green Lane Allotments: Be Living supports the allocation of this site. Despite having a low PTAL, the site provides a suitable opportunity for development to provide further residential development or through provision for travelling showpeople. We note the public safety zone, and consider it important that this designation is made clear in the allocation. It is considered that the site is available and deliverable in the short term and if bought forward to provide residential development, could contribute to towards LBH's five year housing land supply. Two Bridges: Carter Jonas, on behalf of Lampton 360 Development LLP, has recently submitted a planning application for the proposed redevelopment of Two Bridges to provide 30 residential units (inc. 12 extra care units). It is anticipated that a decision will be made by LBH in Q1 2018. We suggest that the allocation is amended to reflect the planning application particularly with regards to phasing as the site is deliverable prior to 2022 (subject to planning). Royal Naval Association: Be Living supports the allocation of this site. It is considered that the site is available in the short term. New Road Triangle: Be Living supports the allocation of this site as it represents a highly sustainable location for development. We note that within the Feltham Town Centre Masterplan, the site is allocated as being suitable for a tall building and consider that the allocation within the Local Plan review should be consistent with the allocation within the Masterplan. The site's location within the Feltham Housing Zone further supports its suitability to provide a large proportion of residential units. The Feltham Town Centre Masterplan designates this site, alongside two others, to form the 'Station Quarter' and this full allocation should be acknowledged as being deliverable within the allocation. Bridge Road Depot: Be Living supports the allocation of this site as it represents a highly sustainable location for residential development. It is considered that the site could contribute significantly to meeting LBH's housing delivery targets and given its location within the Hounslow Town Centre Housing Zone, the allocation should seek to maximise development on the site in line with the Core Planning Principles Page 24 of 34 set out within Paragraph 17 of the NPPF. With that in mind, and using the</p>	

WoB Site Allocations		
Respondent	Representation Summary	Council Response
	<p>density guidance in the London Plan, Be Living considers that the potential capacity of this Site could be increased from 145 new units and any future development should not be restricted to this number. We also note that this site is included as a Site Allocation within the Rest of the Borough Local Plan review. In addition to the Sites identified and allocated within the Local Plan Review – West of Borough, we consider the following Sites should also be allocated as they can help deliver residential development that will assist LBH in meeting and exceeding the minimum housing delivery targets set by the GLA.</p> <p>Bedfont Lane Scout Hut: The site comprises a soon to be vacant scout hut and is located adjacent to a site currently identified for development. It is considered that the Scout Hut site could be delivered alongside the existing development site to contribute towards housing delivery. A plan identifying the site is enclosed in Appendix 4.</p> <p>Stoneywall Community Centre: The site lies within a predominantly residential area and includes a large area of hardstanding where visitors to the Grove Medical Centre currently park. The existing buildings on the site are currently vacant and falling into disrepair. It is considered that the site could be brought back into future use through development to provide residential units alone or as part of a mixed use scheme. It appears that the Site is allocated for residential use within figure 5.5 (Bedfont Lakes Spatial Strategy) however this should be made clear. A plan identifying the site is enclosed in Appendix 5.</p>	
ESFA (Government)	<p>The WoB Local Plan should confirm specific sites (existing or new) which can deliver the school places needed to support growth, based on the latest evidence of identified need and demand, including in the emerging Infrastructure Delivery Plan and the Sequential Assessments of School sites (as updated). The site allocations and/or associated safeguarding policies should also seek to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary. For an example of the latter, see draft policy</p>	<p>Comments noted. The council has allocated land within the MOD site to support additional schools growth resulting from the housing expected to be delivered in Feltham. The council considers that with this additional capacity the borough has sufficient capacity for future growth at present trends in school place demand.</p>

WoB Site Allocations		
Respondent	Representation Summary	Council Response
	<p>CC7 in Milton Keynes's Plan:MK Preferred Option draft from March 2017 . The site allocation for Feltham Academy 2 (the MOD site, page 25 of Appendix 1) is supported by the ESFA and follows the Planning Brief for the site which was recently adopted by the Council. While it is important to provide clarity and certainty to developers, retaining a degree of flexibility about site-specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. The EFSA therefore recommend the Council consider highlighting in the next version of the Local Plan that: - specific requirements for developer contributions to enlargements to existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that - requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use. In light of pipeline school projects which may be appropriate for specific designation, the ESFA welcomes the ongoing engagement between the ESFA and the Council to progress delivery of schools.</p>	
D. Bhail (Individual)	<p>I understand that the Naval Club is to be developed. Good choice...but surprised you didn't take the opportunity to use the hard surfaced area behind it which the borough owns and is wasteland. The main concern about this development is traffic and parking which will be a planning obstacle as highlighted in the traffic assessments prev. conducted for the road. But there is simple solution – Park Road bends around and terminates!?! But this land and the housing estate is owned by the borough. It can easily be extended back to Hounslow Road. All that stops this a strip of land c5 metres wide. This would afford dual entry to Park Road and assist not only the new housing, the football grounds and also the school. It should certainly be investigated as an option.</p>	<p>Comments noted. The council has considered the proposed amendments to site allocations and has made adjustments where considered appropriate to the aims of the plan. The land to the rear of the Naval club was considered through the Site Allocations and Capacity Assessment (2019) but was considered to be of limited capacity owing to the difficulty of providing access to the site while delivering the Naval Club, and that the majority of the site is designated as open space as part of Hanworth Park.</p>
Campaign to Protect Rural England (Non-profit organisation)	<p>"Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed. • One site ("Airport Business Park") of 44 hectares (440,000sqm) is allocated for just</p>	<p>Comments noted. The council has completed its Stage 2 Green Belt review, which can be found in the Local Plan evidence base. This identified areas of poorly performing green belt to be released in order to result in</p>

WoB Site Allocations		
Respondent	Representation Summary	Council Response
	<p>145,000sqm of 'light industrial / storage' floor space. This seems particularly inefficient use of space, in particular if an assumption is made that development could be built to 4 or 5 storeys. • Another example is the 'Fagg's Rd' site which is listed as 34,900sqm, about 20,000sqm of which is green space but which the Site Allocation says will only deliver 5,700sqm of additional floorspace. This could be found by remodelling the already developed section of the site rather than encroaching into green space. • Hounslow states that a total of 414,000sqm of additional floor space provision required for commercial / industrial [at least 201,000sqm of Industrial floor space; at least 190,000sqm of B1 workspaces (office /light industrial uses); at least 23,000sqm A1-A4 retail uses (Feltham) p49 main document]. And yet the borough is proposing to allocate something like 750,000sqm for these categories (it has been impossible to work out exactly how much). Individuals sites which are identified for development in the main Local Plan document but which do not appear in Site Allocations - 49 hectares Green Belt loss (+ 2 hectares playing fields): 1. 1E / 1W West of Southall Lane ("Cranford &amp; Heston" in main LP doc). Large areas allocated for de-designation from Green Belt. Clearly fulfils Green Belt purposes 1 and 2 and should be retained as Green Belt Clearly part of a larger area of Green Belt, clearly open, part of the stretch of GB which separates town Heston and Hayes. Clearly 2. 13 North-west of Clockhouse Roundabout ("Heathrow Gateway"). "The Heathrow Gateway site provides an opportunity to create a high-density mixed-use development located around a new Southern Access railway station, providing a mix of offices, apartments, hotels, shops, bars and restaurants." Clearly fulfils Green Belt purposes 1 and 2 and should be retained as Green Belt Clearly part of a larger area of Green Belt, separates East Bedfont and Stanwell and is part of a major piece of Green Belt which also separates Ashford and Feltham further to the south and south east 3. Additional site connected to and south of "Heathrow Gateway" contained within Staines Road and Clockhouse Lane. Clearly connected to and possibly part of Bedfont Lakes Country Park. Clearly fulfils Green Belt purposes 1 and 2 and should be retained as Green Belt Clearly part of a larger area</p>	<p>a defensible and permanent green belt boundary. The council has considered the potential of these released sites to support meeting our Objectively Assessed Needs and to provide publically accessible open space for local residents. This has resulted in the majority of land which did not meet the purposes of the green belt being re-designated as Local Open Space. Allocations on released land seek to ensure that their development increases accessibility to this new local open space and provides a sensitive boundary (with multiple access points and green buffers) in order that these spaces can be used. Airport Business park is intended to support the council in meeting the specialised needs of Heathrow and to ensure we plan for the potential expansion of Heathrow over the plan period. The proposals for the site envisage a large amount of local open space to be provided alongside the development. Please see the open space map in the Local Plan.</p>

WoB Site Allocations		
Respondent	Representation Summary	Council Response
	<p>of Green Belt, and is part of a major piece of Green Belt which also separates Ashford and Feltham 4. 15/15E East of Bedfont Road. Appears to be 3 main sites, two of around 5 hectares and one of around 2 hectares – so in total 12 hectares Clearly fulfils Green Belt purposes 1 and 2 and should be retained as Green Belt Clearly part of a larger area of Green Belt; clearly forms a barrier between Bedfont and Ashford, as well as Feltham and Ashford, and to some extent Feltham and Bedfont – stopping these towns from merging; de-designation would clearly compromise the larger area of Green Belt by impacting on its extent and openness. 5. 22E Feltham Marshalling Yard. Allocated for residential as part of the Future Feltham plans Clearly fulfils Green Belt purposes 1 and 2 and should be retained as Green Belt Clearly connected to Hounslow Heath to the North West and forming part of a green chain with a thin link to the Longford River and Feltham parks beyond. Forms a clear boundary for Feltham on its East side, preventing it from merging with Hanworth and beyond; River Crane is also on the East of this site. 6. Playing fields to the north of Elmwood Ave, Feltham (2.25H) Loss of playing fields. It is difficult to assess the loss because the proposals simply show the site as allocated for housing Site allocations - 52 hectares Green Belt loss (+ 7 hectares other green space) 1. Airport Business Park (Area 11: South of Hatton Cross / Hatton Road) Would provide 145,000sqm light industrial and storage: justification is it contributes to target of 201,000 sqm provision of industrial space (with some convenience retail/café). Industrial site across the road with potential for remodelling and to make better use of poorly used surface car park space; redevelopment of 50s/60s/70s buildings • SINC. PSZ Clearly fulfils Green Belt purposes 1 and 2 and should be retained as Green Belt 44 hectares of Green Belt clearly connected to other Green Belt. It is clearly connected to wider Green Belt i.e. supports Purpose 1 in holding back urban sprawl; it is a very clear outer edge of London (the airport being beyond London’s development). It supports Purpose 2 – it is a clear boundary for Feltham. Its de-designation would compromise the wider Green Belt in the area. Partly designated as a SINC increasing its value as green space. 2. Central Park Trading Estate (Area 8E Green</p>	

WoB Site Allocations		
Respondent	Representation Summary	Council Response
	<p>Lane Sports Ground / Donkey Wood) Wanted for 'light industrial / storage' Clearly fulfils Green Belt purposes 1 and 2 and should be retained as Green Belt Clearly connected to Hounslow Heath to the south (also to Green Lane Allotments to the North, creating a Green Chain - see Site Allocation below) Contributes to the separation of Hounslow West and North Feltham 3. Fagg's Road, Feltham (connected to or part of General Area 11). Green Land surrounding Geodis Freight Forwarding. 3.49 hectares (about 2 of which is green space ) connected to 'Airport Business Park' above. Wanted for employment floorspace = 5,700 m2 (Calculation based on the highest point of PTAL 3 which is 70-170 u/ha but due to Public Safety Zone, the calculation is based on the minimum 70u/ha). The boundary should be drawn tightly around the built up area, leaving the surrounding green space to connect with the Green Belt which should remain intact. This would involve loss of around 20,000sqm to create 5,700sqm of employment space. We would argue that this could be found by intensifying the existing built development on the site. Not clear if the land is designated Green Belt but the site is surrounded by Green Belt and could readily form part of the Green Belt. 4. Green Lane Allotments Site to the north east of the 'Central Park Trading Estate allocation'. Doesn't appear to be allotments. Designated 'local open space'. In a public safety zone PSZ. Council say no longer needed for allotments. Proposed allocation is for residential / storage for travelling show people's equipment. Designated Open Space This should be retained as green space as it is clearly part of a green chain linked to Hounslow Heath and beyond. This land should be retained as Local Open Green Space, saving this land to be enhanced and returned to allotments or retained to create woodland to improve the green chain in terms of providing quality habitat. 5.Heathrow International Trading Centre Proposed redevelopment of the site. "Due to numerous constraints (SINC and the Flood Zone 3a area) on this site the redevelopment /intensification of the site would need to be sensitively carried out" The site allocation should be drawn around the built up areas only (it currently extends towards the River Crane which forms part of the green fields to the east of the river) and leave out the</p>	

WoB Site Allocations		
Respondent	Representation Summary	Council Response
	<p>green spaces which also act as a flood plain. The site could be redeveloped without building onto the fields. 6. Royal Naval Association Club Not clear if this is on Green Belt land. Mentions SINC issues Need to be sensitive to SINC issues. Otherwise no objection. Previously developed land though the boundary is bigger than the built footprint (though it is all hardstanding) 7. Tesco Duke's Green Superstore / Tesco Feltham Superstore Appears to support intensification of these sites for housing Consider whether noise and pollution issues make this an inappropriate site for housing. Makes sense to redevelop the site but it is down for housing and commercial: it is very close to Heathrow – so noise issues should mean it makes more sense to use this for additional commercial space 8. Vacant land Dick Turpin Way 10W West of Girling Way (south of A30, East of Fagg's Road). Green Belt land. Wanted for industrial space Clearly fulfils Green Belt purposes 1 and 2 and should be retained as Green Belt Land creates a clear connection between the River Crane sites to the East and the large Bedfont Rec/farm site to the West. Clearly part of a much bigger piece of Green Belt. 9. Vantage Park / Heathrow Causeway Centre Partially in Green Belt. Not clear why this should be needed Wanted for B1/B8 employment uses The site allocation should be drawn very tightly around the existing built up area. Unnecessarily pushes out into the green space. Mostly this site is already developed but it is very close to the River Crane and would remove what little green space is left to the East of it. This is a flood plain and SINC 10. Nene gardens - Local open space 11. New Road Triangle - Local open space Alternatives to green belt sites which we believe should be / should have been investigated as part of the preparation of the Hounslow West of Borough Local Plan Review (A list of sites which we believe could be 'recycled' to provide more space): FELTHAM (sites for proposed 'Future Feltham' developments) The majority of the proposed redevelopment does not encroach onto Green Belt but we believe that alternatives could be found to using the old railway sidings. • Land could be reclaimed at the Poplar Way roundabout and land to the East of Poplar way could be intensified • E.g. a number of smaller sites could be found e.g. land contained within</p>	

WoB Site Allocations		
Respondent	Representation Summary	Council Response
	<p>Sunbury Road, the A244 and Spring Road; reclaim road at the corner of Sheringham Road and High St; also the opposite corner, land around existing buildings (reconfigure parking arrangements); LAND NORTH EAST OF BEDFONT ROAD (proposed site for 'Bedfont Lakes' development) Alternative sites to the Green Belt sites at Bedfont Road</p> <p>We have major concerns about development at Bedfont lakes: 1. The proposed development is away on the edge of residential area and away from a town centre: this does not appear to be a sustainable location. 2. The proposed encroachment to the North of the Bedfont Lakes Green Belt site is worrying because it compromises the openness when looked at in tandem with the (incongruous) site Slivergray Carriages in the middle of this piece of green belt area. Further development to the north will impact on the overall openness to the extent that the rest of the Green Belt north of Bedfont Road will be compromised. 3. The other major concern is the proposal to place large amounts of housing very close to Heathrow Airport with associated noise and air pollution. For the reasons above – we believe alternative, more sustainable, site(s) should be found for any major housing development.</p> <ul style="list-style-type: none"> <li>• E.g. further south, for example by creating a new town centre at Hampton Road West, where excessive road space could be reclaimed and the low-rise, low-density commercial/industrial estate could be reconfigured. This could be connected via cycle and walking routes to Feltham or Fulwell train stations which are a 10 minute cycle or 30/35 minute walk away.</li> <li>• Smaller sites could also be found within the nearby area for infill e.g. where Saxon Avenue / Normal Avenue meet. We would not normally advocate building on green space or in a conservation area BUT there are small sites nearby in East Bedfont which collectively could provide space for housing. It is not clear why these sites might be considered inappropriate, while Green Belt (which has the strongest protection) is considered appropriate, for housing. Some of the sites are:</li> <li>• Land at the bend in Imperial Road</li> <li>• Land in the middle of land bounded by Southville Rd to the south and Colonial Rd to the north</li> <li>• Strip of green space to the north of Staines Road between Page Rd and Burlington Close</li> <li>• Strip of green space at Grovestile Way</li> </ul>	

WoB Site Allocations		
Respondent	Representation Summary	Council Response
	<p>Land bounded by Staines Road and Elm Road (with Grovestile Way to the west) • Intensification of space between Burlington close and Staines Road • Land at Fawns Manor road (the roundabout and the land to the west of it) • Land at Sherborne Road SOUTH OF STANWELL ROAD (proposed site for 'Heathrow Gateway' development) Alternative sites to the large Green Belt site South of Stanwell Road • Intensification of Bedfont Lake Business Park – this does not appear to be allocated for intensification but this would be a clear alternative. The google earth image [in submission] shows that much of the site is surface car park (see the buildings directly south of the roundabout which are shown shaded in mauve in the other image.)The image to the right shows the Council's plan for the area: the site listed at 'Bedfont Lakes Business Park' is not (as far as we know) listed for intensification / remodelling to make better use of the space, but provides a clear alternative to developing the Green Belt land to the north. • SAP UK Ltd site - Thi [sic] is another site to the North which also has surface car park but does not appear to be listed at all, whether for intensification or otherwise. It appears to be part of a conservation area but it is not clear, from looking at it, why this should be considered more important than Green Belt which has the strongest protection from development. • Ascot Road site (can be seen at the bottom left of the google earth image [in submission]) – also has major potential for intensification but does not appear to be listed • Roundabout land There is an opportunity to reclaim some of the road space as it is reconfigured to accommodate the new railways station • Strip of green space along the north of Staines Road which might lend itself to the development of a 'high street' with mixed residential and some local convenience retail. • Large surface car park to the North of this Green Belt site (listed as T4 long stay) which, though outside of the borough boundary, could be intensified to create space. There are also some areas to the west of the site shown on the same image which could be intensified. SOUTH OF HATTON ROAD (proposed site for 'Airport Business Park' development) There are clear alternatives to this site within very close reach: • Intensify the industrial estate to the east of Fagg's Road. Much of this</p>	

WoB Site Allocations		
Respondent	Representation Summary	Council Response
	<p>estate is low-density, low-rise and surface car park which could remodelled to double or triple existing floor space (see below images from Google Streetview showing (a) low-intensity use (b) old buildings in need of replacement • Albeit these are out of Borough, there are two very large surface car parks to the east and west of Hatton Cross which could be intensified to create more space – note there is a 7 storey hotel adjacent to one of the car parks giving an indication of the potential for these sites CRANFORD &amp; HESTON Alternative sites to the Green Belt site north of the M4 and to the east of The Parkway • The image [in submission] shows the industrial estate to the north of the proposed site(both sides of Hayes Road): this has large areas of surface car park and buildings which could be remodelled to create more floor space • Hayes Road also appears to be unnecessarily wide: it goes from one lane to two lanes at the industrial estate. A lane could be recovered from each side to create more space"</p>	
B. S. Dhillon (Individual)	<p>Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed. Green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period.</p>	<p>Comments noted. The council has taken a density by design approach to sites to ensure they deliver an optimal capacity. Proposals for sites can exceed these where this can be demonstrated to not impact on surrounding areas. The council has significant objectively assessed need for housing over the plan period, and we have attempted to find sites to meet this need in line with the National Planning Policy Framework (NPPF) but still face a significant challenge in delivering these homes over the plan period.</p>
Hanwell Community Forum (Community organisation)	<p>Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed. Site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency."</p>	<p>Comments noted. The council has taken a density by design approach to sites to ensure they deliver an optimal capacity. Proposals for sites can exceed these where this can be demonstrated to not impact on surrounding areas. The council has significant objectively assessed need for housing over the plan period, and we have attempted to find sites to meet this need in line with the National Planning Policy Framework (NPPF) but still face a significant challenge in delivering these homes</p>

WoB Site Allocations		
Respondent	Representation Summary	Council Response
		over the plan period.
C. Sabucci (Individual)	Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed. Site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency.	Comments noted. The council has taken a density by design approach to sites to ensure they deliver an optimal capacity. Proposals for sites can exceed these where this can be demonstrated to not impact on surrounding areas. The council has significant objectively assessed need for housing over the plan period, and we have attempted to find sites to meet this need in line with the National Planning Policy Framework (NPPF) but still face a significant challenge in delivering these homes over the plan period.
S. Lofthouse (Individual)	Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed. Site allocations and Green Belt Review sites are not cross referenced, leading to a lack of transparency.	Comments noted. The council has taken a density by design approach to sites to ensure they deliver an optimal capacity. Proposals for sites can exceed these where this can be demonstrated to not impact on surrounding areas. The council has significant objectively assessed need for housing over the plan period, and we have attempted to find sites to meet this need in line with the National Planning Policy Framework (NPPF) but still face a significant challenge in delivering these homes over the plan period.
J. Leach (Individual)	Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed. Site allocations and Green Belt Review sites are not cross referenced, leading to a lack of transparency.	Comments noted. The council has taken a density by design approach to sites to ensure they deliver an optimal capacity. Proposals for sites can exceed these where this can be demonstrated to not impact on surrounding areas. The council has significant objectively assessed need for housing over the plan period, and we have attempted to find sites to meet this need in line with the National Planning Policy Framework (NPPF) but still face a significant challenge in delivering these homes over the plan period.
S. Williams (Individual)	Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed. Site allocations and Green	Comments noted. The council has taken a density by design approach to sites to ensure they deliver an optimal capacity. Proposals for sites can exceed these

<b>WoB Site Allocations</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	Belt Review sites are not cross referenced, leading to a lack of transparency.	where this can be demonstrated to not impact on surrounding areas. The council has significant objectively assessed need for housing over the plan period, and we have attempted to find sites to meet this need in line with the National Planning Policy Framework (NPPF) but still face a significant challenge in delivering these homes over the plan period.
D. Wetzel (Individual)	Site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency.	Comments noted. The Green Belt Review aims to ensure that sites are assessed to ensure that the boundaries of the Green Belt are defensible and permanent beyond the plan period, by identifying sites which are weakly performing and recommending they are redesignated from Green Belt as they do not meet the purposes of the Green Belt as set out in the National Planning Policy Framework (NPPF). The review does not recommend potential uses for Green Belt Sites.
C. Fisk (Individual)	Site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency.	Comments noted. The Green Belt Review aims to ensure that sites are assessed to ensure that the boundaries of the Green Belt are defensible and permanent beyond the plan period, by identifying sites which are weakly performing and recommending they are redesignated from Green Belt as they do not meet the purposes of the Green Belt as set out in the National Planning Policy Framework (NPPF). The review does not recommend potential uses for Green Belt Sites.
R. Mckinney (Individual)	Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed. Site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency. Green Belt sites should not be allocated for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period.	Comments noted. The council has taken a density by design approach to sites to ensure they deliver an optimal capacity. Proposals for sites can exceed these where this can be demonstrated to not impact on surrounding areas. The council has significant objectively assessed need for housing over the plan period, and we have attempted to find sites to meet this need in line with the National Planning Policy Framework (NPPF) but still face a significant challenge in delivering these homes

WoB Site Allocations		
Respondent	Representation Summary	Council Response
		over the plan period.
V. Suckling (Individual)	"Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed. Site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency. "	Comments noted. The council has taken a density by design approach to sites to ensure they deliver an optimal capacity. Proposals for sites can exceed these where this can be demonstrated to not impact on surrounding areas. The council has significant objectively assessed need for housing over the plan period, and we have attempted to find sites to meet this need in line with the National Planning Policy Framework (NPPF) but still face a significant challenge in delivering these homes over the plan period.
Queens Park Rangers Football Club (Company)	In conjunction with our representations we would suggest that the Cranford Community College be added to be the Site Allocations to reflect its use as an educational community and sports facility.	Comments noted. The council has allocated sites where these have potential to support meeting Objectively Assessed needs. As no development for these purposes has been identified on the site, we have not included it in the site allocations.
Sport England (Non-departmental government body)	Airport Business Park, Land at Hatton Farm, Bedford: Aerial images of the site show that part of the area identified within the red line has been used for playing fields (area to the East of the allotments, North of Kingston Avenue). Sport England therefore requests that the Council removes this playing field area from the site allocation or justifies the inclusion of these playing fields in the context of the Council's Playing Pitch Strategy. Cavalry Barracks, Beavers Lane, Hounslow TW4 6HD: The proposed allocation includes playing field land. Sport England objects to this site allocation. Sport England will withdraw this objection if; - The text is revised to confirm that the playing field land and ancillary facilities will be retained within the site and will be made available to the new and existing community. - The playing field area and ancillary facilities are removed from the allocation. MOD Feltham, DGC Feltham, Elmwood Avenue, Feltham, TW13 7AH: Sport England objects to this site allocation as the policy does not include text that confirms that the existing playing field, tennis courts and ancillary facilities including parking that existing on this site will be retained. A copy of Sport England's response to an application for this site is	Comments noted. A large amount of land within the airport business park is proposed for designation as Local Open Space, including the areas identified as playing fields. These facilities will be retained as part of the plan and remain available for use. Land at Dick Turpin way has been identified to support meeting the council's employment floorspace needs.

WoB Site Allocations		
Respondent	Representation Summary	Council Response
	<p>attached. The policy should be reworded to confirm that these sports facilities will be retained for the community. Other site allocations; The following sites contain open space, some of which is used informally by local residents; New Road Triangle, Nene Gardens, Dick Turpin way. Before developing these sites for other uses, the Council should consider carefully whether or not all or part of these sites should be retained to provide the opportunity for informal recreation or physical activity.</p>	
Tyburn House	<p>The site subject of this representation submission comprises two buildings; Building A, known as Tyburn House, is used for offices in connection with an airport security business at ground floor and has an ancillary staff flat at first floor level. The other building is Building B – a steel framed corrugated metal-clad warehouse building used for the storage and screening of freight. The site is located within very close proximity to Heathrow Airport. The surrounding area consists largely of offices and industry associated with Heathrow Airport. 4.2The site has a lawful use as defined by the Town and Country Planning (Use Classes) Order 1987 (as amended), as a mixed use B1 Offices (Use Class) and B8 Storage or Distribution (Use Class). 4.3The site is currently located within the Green Belt. The Hounslow Green Belt Review (Stage 2) evidence base documents have established exceptional circumstances for its release from the Green Belt for employment development. The delivery of this site will therefore be dependent on the de-designation of Green Belt land. 4.4The Council's ELR concludes that even with the intensification of existing industrial sites there is not enough land available in the west of the Borough to meet the needs of the warehousing and logistics market. It concluded that to meet the demand over the next 15 years' Green Belt would likely be the only source of land. As such, it is contended that by de-designating this site from the Green Belt and allocating this site for future employment development, will allow it to contribute to the delivery of employment and business growth required within the Borough particularly those</p>	<p>Comments noted. The council has considered the proposed amendments to site allocations and has made adjustments where considered appropriate to the aims of the plan.</p>

WoB Site Allocations		
Respondent	Representation Summary	Council Response
	<p>close to Heathrow Airport during the plan period to 2032. In addition to the above, Hounslow has an OAN of 1,898 dwellings per annum over the period 2015 to 2035. Whilst the site at Dick Turpin Way has been identified as a site for potential employment development, it is contended that this site should also be made available for housing, given its sustainable location and proximity to Heathrow Airport. It has been explained that the site at Tyburn House is not within the PSZ and therefore, it is considered unreasonable that residential development should be precluded by the Council at this stage. It is the case that the PSZ constraint only features along the site's southern boundary referred to as 'Vacant land Dick Turpin Way (South of Hatton Cross Station)' as part of the Local Plan review site allocations. As such, Tyburn House is not constrained by this designation, as confirmed as part of the Council's assessment for planning permission ref. 01380/A/P9, where the PSZ did not form a material planning consideration due to the proximity with the site.</p> <p>4.6 In addition to the above, any future development of housing across the entire area of land referred to as 'Vacant land Dick Turpin Way (South of Hatton Cross Station)' as part of the Local Plan review site allocations could be designed in such a way as to ensure that the southern boundary remains unoccupied, or with low density types of development such as parking or public open space. As such, it is considered unreasonable to preclude this site for any future housing developments.</p> <p>4.7 As such, for the reasons set out within this statement, it is submitted that the site at Tyburn House and referred to as 'Vacant land Dick Turpin Way (South of Hatton Cross Station)' as part of the Local Plan review site allocations, should be de-designated from the Green Belt and allocated as a site for future employment and or housing development, to assist in the growth required within the Borough. "</p>	
A2 Dominion Developments Limited (Company)	Whilst the Former Morrisons Supermarket (subject of the planning application) is identified as a site allocation	Comments noted. The site has been removed from the Site Allocations following the grant of permission for the

<b>WoB Site Allocations</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	<p>in the WoBLP (Figure 4.1, page 40), it is not accompanied by supporting site allocation details. Clarification on this should be provided. It is considered appropriate and necessary that allocation details are provided within the WoBLP, to accompany the identification of the site's allocation and should be provided in the next iteration of the WoBLP. It is appropriate the allocation details are in accordance with the planning application (subject to a resolution to grant) for the provision of 176 affordable homes and a small retail unit.</p>	<p>site.</p>
Heston Residents' Association	Heston Residents' Association does not agree with the proposals in the site allocations.	Comment noted.
London Diocesan Fund (Company)	London Diocesan Fund does not agree with the proposals in the site allocations and consider that in addition to the site allocations identified in Appendix 1, there are further sites that could be brought forward.	Comment noted.
R. Clarke (Individual)	<p>The RBS site is sensitive to Hanworth Park, and is part of the important industrial area. Any conversions would need to be of a high standard, and in keeping with Hanworth Park. Please note - this location is not in Hanworth, so the justification is not valid. There could be the opportunity to consider an enabling development in Hanworth Park to restore Hanworth Park House. Airport business park is an area of SINC - this should be retained. Central Park trading Estate is an important green space, which forms an important role in the Greenbelt preventing sprawl between Hounslow and Feltham. It is important to protect the open character of Hounslow Heath. Heathrow International Trading Estate - any development here must protect and enhance the local green space and aspect from the river. New Road is important open space, which affects the character and access to Feltham Arenas. It is not appropriate for a large scale development, particularly with a lack of parking and congestion in this area. There is currently a path which borders the site - any development near this would need to be low level. The site is also potentially visible from in front of Feltham station in the conservation area, and its impact on this view would need to be considered. The Royal Naval Club is not in the Feltham Town Centre Boundary. Any development here could be visible from the park. This may affect the historic setting of the airpark and the view from</p>	<p>Comments noted. Prior Approval has been granted for conversion from Office to Residential of the RBS Site, also known as Smith House under 00403/E/PA1 , 00403/E/PA2, 00403/E/PA3, and therefore the council is seeking to ensure that a scheme which comes forward on the site optimises capacity and results in more effective planning for the site in terms of public realm and the suitability and size of units within the development.</p>

WoB Site Allocations		
Respondent	Representation Summary	Council Response
	<p>Hanworth Park House. It would not be appropriate to be large scale - and any development should respect the heritage of the Royal Naval Association, and important role this community have played. As a point of note, as this is in Hanworth, it should be considered through a separate Hanworth Masterplan, and not part of the Feltham one. This therefore fails to understand the importance of place for Hanworth. Tesco Feltham is not suitable for a large scale development as this could compromise views from Feltham Green and the Red Lion across to Feltham Manor. Currently the car park and low character of this area is in keeping with the village charm of the Conservation Area, a larger development would not be. The style of the existing building with its gables is appropriate for this area. Vantage Park - any development on this site must take into consideration the Crane River walk, and facilitate new crossings over the A30 for walkers. Other possible sites to consider: Sites around Hanworth - e.g. Snakey Lane / Felthambrooke fields - if connected with improved cycle facilities. Feltham Young Offenders Institute. Sensitive enabling development around Hanworth Park House - on site of former hangers. Feltham Assembly Hall</p>	
G. Pollitt (Individual)	<p>The respondent agrees with the proposals in the site allocations and considers that in addition to the site allocations identified in Appendix 1, the Marshalling Yards and old Feltham Feast site could be brought forward.</p>	<p>Comments noted.</p>
Boundaries Road Residents Association (Community organisation)	<p>Boundaries Road Residents Association do not agree with the proposals in the site allocations and recommend that no high density, high rise housing development is taken forward in the town centre. Boundaries Road Residents Association do not consider there to be any more development sites in the area.</p>	<p>Comments noted. The council has taken a density by design approach to sites to ensure they deliver an optimal capacity. Proposals for sites can exceed these where this can be demonstrated to not impact on surrounding areas. The council has significant objectively assessed need for housing over the plan period, and we have attempted to find sites to meet this need in line with the National Planning Policy Framework (NPPF) but still face a significant challenge in delivering these homes over the plan period.</p>
S. Ambrose (Individual)	<p>The respondent agrees with the proposals in the site allocations and considers that, in addition to the site allocations identified in Appendix</p>	<p>Comments noted.</p>

<b>WoB Site Allocations</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
	1, Hanworth Park House could be brought forward	
Noyces Funfair (Company)	Noyces Funfair do not agree with the proposals in the site allocations and consider that there are further sites that could be brought forward.	Comments noted.
Airport Industrial Property Unit Trust (Company)	Notwithstanding AIPUT's general support, it is considered that the potential capacity of the site could be significantly higher than the 8,865.4 sqm stated in the proposed allocation. The area of the site (the Green Belt land) is approximately 4 hectares ('ha') in total. The potential capacity stated in the proposed allocation is therefore only approximately 22% of the site. The potential capacity stated in the proposed allocation does not provide for the most efficient and effective use of the land in meeting the recognised need for employment / logistics land set out in planning policy. The potential capacity in the proposed allocation for CPTe should therefore be increased. AIPUT is a specialist owner and manager of warehouse and logistics property at and around major UK airports. AIPUT's earlier representations proposed that the Green Belt section of the CPTe site should be allocated for employment / storage / logistics use. However, the proposed use stated in the allocation (see Figure 2.1) does not refer directly to storage or logistics, whereas other similar, proposed allocations in the Preferred Options WoBP refer specifically to such uses. AIPUT therefore requests that the allocation is amended to refer to a proposed use comprising 'Employment – logistics/storage, warehousing, light industrial and supporting services'. This would align with AIPUT's core business and is consistent with uses on the remainder of the CPTe site. The provision of logistics uses at the CPTe site to support the Airport is also consistent with the need set out in the planning policy referenced earlier in this section.	Support for allocation noted. Comment Noted. The council has considered the proposed amendments to the site allocation as made adjustments where considered appropriate to the aims of the plan.
SEGRO (Company)	SEGRO have the following comments on the site allocations contained in Appendix 1 of the Consultation document. Vantage Park/Heathrow Causeway Centre: The Site (now known as SEGRO Park Heathrow) falls within an existing strategic cluster of industrial land that is located in close proximity to Heathrow Airport. As such, the parts of the Site that are currently designated as a Locally Significant Industrial Site (LSIS) should continue to be protected in line with Policy ED2 (Maintaining the	Support for allocation noted. The council has considered the proposed amendments to the site allocation as made adjustments where considered appropriate to the aims of the plan.

WoB Site Allocations		
Respondent	Representation Summary	Council Response
	<p>Borough's Employment Land Supply). SEGRO agree that the part of the Site that falls within the Green Belt no longer meets the purposes listed in Paragraph 80 of the NPPF as set out in Barton Willmore's enclosed Green Belt Appraisal (February 2016). This concluded that it should be removed from the Green Belt. The West of Borough Plan shows this land as being re-designated as Metropolitan Open Land. Whilst, SEGRO have no objection to this in principle, the extent of Metropolitan Open Land should be considered in the context of the scheme at the Site that has recently been approved by Members at 5th October Planning Committee under Planning Application P/2017/2824. This is important for the below reasons. Firstly, it ensures that all of the land contained within the new Metropolitan Open Land designation performs the functions set out in Policy 7.17 of the London Plan with the vegetated area serving as a buffer zone between the warehouse and the River Crane. Secondly, Paragraph 7.56 of The London Plan advises that national guidance contained in the NPPF around Green Belt applies equally to Metropolitan Open Land. At Paragraph 84, this states that 'when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable forms to development'. Paragraph 85 goes on to state that 'when defining boundaries, local planning authorities should...not include land which it is unnecessary to keep permanently open'. Thirdly, and linked to the above, it prevents the proposed buildings or hardstanding areas associated with the approved development falling within the designation that places unnecessary restrictions on any subsequent development further down the line. A solution to this is extending the LSIS designation to cover the more permanent aspects of the scheme as shown on enclosed Drawing 30497-PL-201. This increases flexibility and provides synchronicity between the planning policy designation and what is built 'on the ground' by creating a clear, unambiguous boundary. Indeed, Policy E6 (Locally Significant Industrial Sites) of the Draft London Plan requires London Boroughs to define detailed boundaries and policies maps that take into account the scope for intensification. The proposed uses for the parts of the Site allocated as</p>	

WoB Site Allocations		
Respondent	Representation Summary	Council Response
	<p>an LSIS should be those that are listed under Hounslow Local Plan Policy ED2, i.e. B1/B2/B8 and similar uses not included in the Use Classes Order (sui generis), such as builders' merchants. Restricting the uses to B1 and B8 uses limits the future (re-)development potential of the Site. Heathrow International Trading Estate This Site also falls within the same existing strategic cluster as Vantage Park/Heathrow Causeway Centre (SEGRO Park Heathrow). As such, it too is located in a prime location in close proximity to Heathrow Airport. Again, the parts of the Site that are currently designated as a Locally Significant Industrial Site (LSIS) should continue to be protected in line with Policy ED2 (Maintaining the Borough's Employment Land Supply). It is agreed that the area of this Site falling within the Green Belt no longer serve its purpose, as demonstrated in Barton Willmore's Green Belt Appraisal (February 2016), and it is agreed that it should be removed. The proposed uses for the parts of the Site allocated as an LSIS should be broadened to those employment uses that are listed under Policy ED2, i.e. B1/B2/B8 and similar uses not included in the Use Classes Order (sui generis), such as builders' merchants. Restricting the uses to light industrial and ancillary offices limits the future (re-)development potential of the Site. Fagg's Road The Site lies adjacent to Radius Park and the proposed Airport Business Park allocation. As such, it is in a prime location to take advantage of the close proximity to Heathrow Airport. The western part of the Site falls within the Green Belt and SEGRO agree with the Council's assessment that this should be released as it no longer performs a Green Belt function. This would enable the Locally Significant Industrial Site, which covers the eastern part of the Site (as well as Radius Park to the north), to be extended to maximise flexibility for future employment development. Accordingly, it is noted that Airport Industrial Property Unit Trust (AIPUT), who currently occupy the existing unit on Site, made Representations to the West of Borough Issues Consultation and promoted the removal of the western part of the Site from the Green Belt to be put to a more productive use to assist with meeting the demand for additional warehousing and logistics development. It is acknowledged that part of the Site falls</p>	

WoB Site Allocations		
Respondent	Representation Summary	Council Response
	<p>within the Public Safety Zone (PSZ) and appropriate policies are in place that require future development to adhere to the guidance contained in Circular 10/2010. SEGRO consider that the boundary of the proposed Airport Business Park allocation should be extended to include Site A. Given its location within the Public Safety Zone, Site A could provide low-occupancy supporting uses (Class B1c/B8), such as warehouse storage and lorry parking. This would free-up land located outside the Public Safety Zone to be used more intensively and productively, ensuring the maximisation of land close to Heathrow Airport.</p>	
Berkeley Strategic (Company)	<p>The Land at Feltham site comprises the parcel of land bounded by Ashford Road, Chertsey Road, Bedfont Road and Feltham HM Prison and Young Offenders Institution to the West. The site is located approximately 400m east of the London Borough of Hounslow's boundary with Spelthorne Borough Council in Surrey. In summary, Land at Feltham site is a highly sustainable location close to the M25, Heathrow Airport and a host of public transport nodes. It is also in close proximity to an established District Centre which contains a wide range of shops, services, facilities and employment opportunities. The location of the site presents a distinctive opportunity to both contribute to The Council's vision to create a thriving town centre at Feltham with a growing community as well as alleviate physical development pressure within the town centre which is targeted to 3,500 homes by 2026. As a sustainable site and location, it is considered that a high quality sustainable residential development could be delivered, responding to the constraints and opportunities that the site presents and ultimately contributing a significant number of new homes which will help to meet the acute housing needs that existing within the Borough. The site should therefore be re-considered for allocation in the next consultation draft of the WOBLP; the sustainability credentials outlined in this Section should be held central to the review of the site's Green Belt allocation as justified at Section 4.0 of these representations and as set out in National Policy.</p>	<p>Comment Noted. The council has considered the proposed site allocation and has made adjustments where considered appropriate to the aims of the plan.</p>

<b>WoB Site Allocations</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
Royal London Asset Management (Company)	<p>Appendix 1 of the West of Borough Local Plan Review sets out the site allocations for the area. RLAM consider that the area of Bulls Bridge Industrial Estate identified by the accompanying site location plan should be removed from the wider LSIS designation and, instead, allocated for a residential-led mixed use scheme. RLAM consider that the site is currently underutilised and presents an excellent opportunity to deliver a number of significant benefits for the local community. It is considered that the most appropriate approach for delivering these benefits would be through the redevelopment of the site to provide a residential-led mixed use scheme. The site is located in an area characterised by a mix of uses, and is located on the periphery of the Bulls Bridge Industrial Estate, at its eastern edge. Access to the site is provided via an access road from Hayes Road, which separates the site from the main part of the industrial estate. The surrounding area is characterised by a mix of uses, including retail and industrial. A large retail unit occupied by “Toys R Us” is located to the south-west of the site, with a Tesco Extra store beyond. Bulls Bridge docks and the Grand Union Canal are located to the north of the site, with the International Trading Estate beyond. RLAM therefore consider that the site could make a significant contribution to delivering much needed new housing in the Borough. The loss of existing industrial floorspace could be offset against the provision of new, high quality employment floorspace as part of the scheme, which would have potential to deliver an increase in the number of jobs on the site. On this basis, RLAM request that that the site is identified as a residential-led mixed use allocation in the emerging Local Plan, and that sufficient flexibility is provided in the wording of the allocation to allow a redevelopment scheme to be delivered in the future. Further detail in relation to the quantum of uses that RLAM wish to propose will then be provided at later stages of consultation. The quantum of floorspace or number of dwellings to be delivered on the site would be dependent on the scale, massing and type of development. Flexibility in relation to the mix and type of uses proposed for the site is therefore suggested at this early stage of the Local Plan process.</p>	<p>Comment Noted. The council has considered the proposed site allocation and has made adjustments where considered appropriate to the aims of the plan.</p>

WoB Site Allocations		
Respondent	Representation Summary	Council Response
Travis Perkins plc (Company)	<p>Our client is the freehold owner of the existing builders' merchants at 371 Staines Road, Hounslow, TW4 5AP(The Site), which has an established sui generis builders' merchant use. TPP are the freehold owner of the Site which is unallocated within the adopted policies map. In October 2016 TP promoted the Site to the LB Hounslow 'Call for Sites', requesting that this sui generis builders' merchants be specifically protected. The Preferred Options version of the West of Borough Local Plan proposes that the Site be allocated for 'Employment' with a proposed use of 'Retail', containing approximately 598 square metres of retail floorspace. This allocation in itself is contradictory as the definition of Employment uses is generally those within the B Use Classes, and not retail which operates under Use Class A1, as set out in the Use Classes Order, 1987. This is a very successful builders' merchants and Travis Perkins (TP), has no intention of vacating the Site. It will remain as a sui generis builders' merchant. Should TP decide to modernise or redevelop the Site, the proposed allocation will not support a sui generis builders' merchant on the Site. It should also be noted that a builders' merchant would be unlikely to operate alongside a retail use, which would both require a ground floor presence with high street frontage. i)Protection of Existing Use The emerging draft West of Borough Local Plan allocates the site for Retail (Class A1) use. The Site is currently operating as a successful sui generis builders' merchants occupied by Travis Perkins, who have no intention to cease trading from this location. The draft allocation puts the builders' merchant at risk and must be reconsidered. It is recognised by TP that the Site could be used more intensively, whether as a more intensive builders' merchant or as a mixed builders' merchant with another suitable use on the upper floors such as offices or residential. A use which needs frontage onto the street at ground floor level will not realistically be capable of operating alongside the builders' merchant on this constrained site. The only option for intensification of the Site through a redevelopment which retains the builders' merchant is to build upwards with the builders' merchant accommodating the ground floor and yard. As such, the draft allocation must be reconsidered and</p>	<p>Comment Noted. The council has considered the proposed site allocation and has made adjustments where considered appropriate to the aims of the plan.</p>

WoB Site Allocations		
Respondent	Representation Summary	Council Response
	<p>the Site allocated for: Sui generis builders' merchant; and / or Sui generis builders' merchant and residential or other compatible use. This will provide TP with certainty that their existing business is protected in the future. ii) Suitability of the Site for mixed Builders' Merchant / Residential Development The Site was promoted to the London Borough of Hounslow 'Call for Sites' in October 2017 seeking allocation of the Site as a sui generis builders' merchant. It is considered a suitable site for a mixed use employment led residential development, given its accessible location and proximity to the adjoining site, known in the Hounslow Local Plan as Site 55 Hounslow West –Staines Road, which is allocated for a residential redevelopment in the years 2021-2025. This site is also currently accommodated by a builders' merchant and has the same constraints as the TP site(location within Heathrow Airport Public Safety Zone and Heathrow Airport 66dB LAeq noise contour). It also has the same PTAL rating. The Council's own Strategic Housing Market Assessment (SHMA)(June 2016)states that there is a need for 1,898 dwellings per annum(dpa) in the borough over the period 2015-2035. The backlog through homelessness and concealed households is 5,579 (279 per annum if spread over 20 years). The Draft London Plan published in December 2017 sets an OAN of 2,182 dpa for Hounslow. This is significant and one of the highest in London. TP has successfully developed builders' merchants with residential uses on sites throughout London, particularly at the 475-491 Battersea Park Road, which incorporated the existing TP branch on the ground of a Barratt residential scheme, and on St. Pancras Way, Camden which has a fully operational builders' merchant operating alongside a UNITE residential development in the heart of Camden. This kind of development would be wholly suitable for the Site and the Council should not be discounting sites which are clearly suitable for residential development, particularly when the Site has predominantly residential surroundings. There is no justification therefore for discounting the Site for an employment led mixed residential use and certainly no reason to allocate the site for a retail (Class A1) use.</p>	
Heathrow Airport Limited	"Heathrow, as part of its preparation of a development consent order,	Comment noted. The Council has engaged with the

<b>WoB Site Allocations</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
(Company)	is considering a number of sites around the airport for potential employment development related to the airport (i.e. airport related development) that will be generated by the airport's expansion. Some of these sites are likely to feature in the Council's West of Borough Local Plan and further thought may need to be given to how the employment land needs of a growing airport can be reconciled with the Council's proposals for sites in close proximity to the airport. The draft plan correctly acknowledges that further work to understand the implications of Heathrow expansion is ongoing and that space for airport related development may potentially compete with other proposed land uses. It notes in particular that there is a scarcity of land in the west of the borough for businesses which need to be in proximity to Heathrow Airport and that expansion will add to the demand for land for these types of businesses, much of which needs to be in very close proximity to the airport. We welcome the draft plan's recognition that local authorities within the airport's functional economic market area will be expected to provide additional sites for growth."	respondent as part of the development of the plan.

<b>Representations received relating to the allocation of the Travelling Showpeople Site, Station Estate Road, Feltham</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
196 individual representations received relating to the allocation of the Travelling Showpeople Site, Station Estate Road, Feltham	Representations largely considered the impact of Plan proposals upon this particular community, including: the strong ties between the Travelling Showpeople community and the area, the historical and cultural importance of the site, the unique requirements of Travelling Showpeople as a group, the lack of appropriate and available sites elsewhere, the effects of the proposal on the mental health of members of the affected community, amongst other issues.	Comments noted. Having completed an assessment of potential suitable alternative sites for re-provision to meet the needs of the existing community, the council will no longer be pursuing this option in the plan.

**Detailed summary of the consultation responses on the minor amendments to the Local Plan 2015 and our response to the issues raised (*\*no longer being taken forward*).**

<b>Local Plan Amendments – Minor Amendments</b>		
<b>Respondent</b>	<b>Representation Summary</b>	<b>Council Response</b>
GLA (Government)	<p>Policy GB1 - additional sub policy (k) The Mayor objects to the release of GB and MOL. The published and emerging London Plans clearly state that the Mayor will not support development on the GB and MOL. A change to national policy on the GB/MOL has not emerged from the Housing White paper. Where there are impacts on open space, contributions should be used to enhance open space, nature conservation and recreation. It is unclear why heritage values is included here, unless it is for heritage assets within open spaces or the open spaces themselves are heritage assets.</p> <p>Policy EQ5 Hounslow should assure itself that the proposed noise threshold is appropriate and would not limit housing development across the borough, especially where appropriate mitigation measures are available.</p>	<p>Comment Noted. In light of the review of the London Plan, the Council has decided not to proceed with minor amendments to the Local Plan at this time. The Council has set out an indicative timetable for the review of the whole Local Plan in the Local Development Scheme (LDS)</p>
Be Living (Company)	<p>Be Living generally supports the amendments to the wording of the adopted policies and considers that the amendments made to the policies are relatively minor in nature, and do not change the aims and objectives of the policies or its conformity with regional and national planning guidance and policy.</p> <p>We do, however, object to the amendments proposed to Policy SC2 (i) on the basis that the new text is inadequate and does not reflect the importance of the Mayor's Homes for Londoners SPG (August 2017). In response, Be Living would welcome a new Local Plan Policy within the Sustainable Mixed Communities section that addresses the emerging Build to Rent/Private Rented Sector.</p> <p>Be Living would welcome a discussion with the Council around the drafting of a new Build to Rent policy and the importance of the distinct economics of this sector relative to mainstream build for sale market</p>	<p>Comment Noted. In light of the review of the London Plan, the Council has decided not to proceed with minor amendments to the Local Plan at this time. The Council has set out an indicative timetable for the review of the whole Local Plan in the Local Development Scheme (LDS)</p>

Local Plan Amendments – Minor Amendments		
Respondent	Representation Summary	Council Response
	<p>housing. In particular, the viability and characteristics of the tenure are different from private market sale, which in turn encourages a different affordable housing model such as discount market rent, which we consider should be included in the wording of any new policy or the rewording of adopted policy SC2(d).</p> <p>We also consider that the new policy should provide flexibility to enable developers to deliver innovative housing types such as flexible 1-person units especially where there is a significant provision of communal facilities and innovations such as this should be encouraged in planning policies. Once again, this flexibility would assist the Council in meeting and exceeding their housing delivery targets and is in accordance with the “alternative pathway” that has been identified within Section Four of the ‘Mayor’s Homes for Londoners SPG’.</p>	
LaSalle Investment Management (Company)	<p>Policy CC3 (Tal Buildings)</p> <p>d) the minor amendment makes reference to compliance with policies of the GWC Plan in relation to tall buildings along sections of the A4 Golden Mile Frontage. As we expressed in our representations to the draft GWC Plan and the draft Brentford East Planning and Design SPD, we have fundamental concerns with the Council’s approach to, and evidence base for, tall buildings in the Brentford East area. The height restriction proposed for 27 Great West Road effectively means that no tall buildings are supported given that the restricted height is lower than the existing building height and existing and consented buildings in the surrounding area. We do not consider that the GWC Plan has been prepared in accordance with the strategic objective for the area and Policy CC3 which supports tall buildings along the A4 Golden Mile frontage in order to support regeneration and growth of the area.</p> <p>Policy CC5 (Advertisement Panels, Hoardings and Structures) The minor amendment proposed to add the following new points:</p> <ol style="list-style-type: none"> <li>1. Resist standalone totems or monolith features.</li> <li>2. Seek the new signage and advertisement features are innovatively incorporated, in a well-considered manner, into the built form of buildings, as was the case, for instance in the traditional Art Deco buildings that originally established the identity of the Great West</li> </ol>	<p>Comment Noted. In light of the review of the London Plan, the Council has decided not to proceed with minor amendments to the Local Plan at this time. The Council has set out an indicative timetable for the review of the whole Local Plan in the Local Development Scheme (LDS)</p>

Local Plan Amendments – Minor Amendments		
Respondent	Representation Summary	Council Response
	<p>Corridor.</p> <p>3. Consider the location of existing advertisements and demonstrate how the proposal will not contribute to existing or create additional harm, in terms of townscape (visual clutter), amenity or public safety. With regard to change 1), this is not a minor amendment. It effectively restricts particular types of signs and design/style and predetermines that these are harmful to visual amenity and/or highway safety regardless of the location, detailed design and assessment. Such a control is beyond the Advertisement Control regulations and regimes, and should be deleted.</p> <p>With regard to change 2), some new signage or advertisement features can be designed to be incorporated into the built form of buildings, particularly at the time when new buildings are proposed. However, in some instances, it may not be appropriate and/or feasible to incorporate signage into the built form of buildings, depending on the type and purpose of the signage. As such, this criterion should be amended to include “where appropriate and feasible,” so that this is not imposed on all signage and advertisement proposals.</p> <p>Change 3) assumes that harm already exists in terms of townscape, amenity or public safety. Furthermore, criterion k) requires signage proposals to demonstrate that the advertisement will not result in visual clutter or a proliferation of harmful advertising. Therefore, this additional criterion is unnecessary and unjustified.</p> <p>Locally Significant Industrial Locations</p> <p>As detailed in our representation to the draft GWC Plan, we strongly object to the continued designation of 27 Great West Road as a Locally Significant Industrial Site (‘LSIS’). We are concerned that the site is continued to be illogically and incorrectly designated as a LSIS, despite the fact that the site has not functioned as an industrial/warehousing site and that the site is proposed to be allocated for a high-density mixed-use development comprising Class B1a offices, residential and other commercial uses (such as retail) in the emerging GWC Plan. There is no justification for the site’s continued designation as a LSIS, which is</p>	

Local Plan Amendments – Minor Amendments		
Respondent	Representation Summary	Council Response
	<p>defined as an employment area of Borough wide significance providing industrial and warehousing capacity.</p> <p>We therefore request that the Council remove 27 Great West Road from the LSIS designation, and update Policy ED2, Figure ED2.1, supporting paragraphs and Policies Map.</p>	
St John's Residents Association (Community organisation)	<p>Policy C12 P180 Community Infrastructure</p> <p>Comment – We are concerned that in a number of cases, the provision of new schools in particular, that the proposed mitigation measures secured by condition are often insufficient or/and undeliverable. The proposed wording change is ambiguous as it is left to interpretation how a proposal can be mitigated. Mitigation must be deliverable and binding if it is to be effective. We therefore suggest that the line be amended to read can be mitigated through effective and deliverable measures secured by a legal agreement.</p>	<p>Comment Noted. In light of the review of the London Plan, the Council has decided not to proceed with minor amendments to the Local Plan at this time. The Council has set out an indicative timetable for the review of the whole Local Plan in the Local Development Scheme (LDS)</p>
Cranford Community College (Non-profit organisation)	<p>Policy C12 Community Infrastructure</p> <p>Cranford Community College is supportive of the addition of sub-paragraph (h) to policy C12 on p.180 of the Existing Local Plan, which states as follows:</p> <p>'(h) Supporting the dual use of educational and community facilities, particularly the use of schools after hours, for a mix of sporting, social, cultural and recreational uses. New school facilities should also be designed to allow for use by the local community where possible.'</p>	<p>Comment Noted. In light of the review of the London Plan, the Council has decided not to proceed with minor amendments to the Local Plan and instead the Council set out an indicative timetable for the review of the whole Local Plan, in the Local Development Scheme (LDS)</p>
London Diocesan Fund (Company)	<p>Policy SC1 which seeks to maximise the supply of housing in the borough should be altered to take account of the revised London Plan housing targets. The London Plan currently requires Hounslow to ensure a delivery of a least 822 units per annum. However Hounslow's Objectively Assessed Need has been calculated to be 1,898 dwellings per annum. It has been acknowledged within the Great Western Corridor review document that there is a gap in the need for housing and the supply of deliverable land. This gap is set to increase following the release of the draft London Plan's Review 2017 housing targets which increase Hounslow's housing target to 21,820 over a 10 year period (which equates to 2,182 units per year). This requires Hounslow to increase their housing numbers by 1,360 units per year, which</p>	<p>Comment Noted. In light of the review of the London Plan, the Council has decided not to proceed with minor amendments to the Local Plan at this time. The Council has set out an indicative timetable for the review of the whole Local Plan in the Local Development Scheme (LDS)</p>

Local Plan Amendments – Minor Amendments		
Respondent	Representation Summary	Council Response
	equates to an uplift of 165% on 2015 – 2025 adopted targets.	
Boundaries Road Residents Association (Community group)	The respondent agrees with the minor amendments to the Local Plan Policies set out in Part 1.	Comment Noted

Local Plan Amendments – Other		
Respondent	Representation Summary	Council Response
GLA	<p>The Mayor would also encourage Hounslow to include a small sites policy, tailored to Hounslow’s local circumstances, as encouraged by policy H2 of the draft new London Plan to set out how small sites will make a contribution to housing delivery, in addition to the growth centres, Opportunity Areas, housing zones and site allocations set out in the draft development plan documents.</p> <p>Overall the Mayor welcomes the preparations of Hounslow’s draft Development Plan Documents and welcomes their commitment to growth, but has strong concerns regarding the proposed release of the Green Belt and the approach to co-location on employment land.</p> <p>In addition, in line with emerging London Plan policy H12, Hounslow no longer needs to set out an approach to housing mix for market and intermediate housing. Table 4.3 in the draft new London Plan sets out the London SHMA findings which shows that 55% of London’s housing need is for one-bedroom units.</p> <p>The Mayor recommends that Hounslow develops a comprehensive plan for its employment land, in line with emerging new London Plan policies E4 to E7 which aim to take a proactive and carefully managed approach to industrial land, whilst protecting the overall amount of floorspace and yard space and its industrial functions. Draft Policy E4 categorises Hounslow as a borough that should retain its industrial floorspace</p>	<p>Comment noted, a small site policy will be developed when reviewing the whole Local plan as the Council considers that detail local evidence is needed to inform this policy, an indicative timetable set out in the Local Development Scheme (LDS). The Council will be embarking a major piece of work in 2020 to start this process and in the interim the Council will use the London Plan policy.</p> <p>Paragraphs 137-139 of the National Planning Policy Framework allow for Green Belt boundaries to be reviewed as part of the Local Plan process and where exceptional circumstances have been demonstrated. In Hounslow's case, a very substantial shortfall in the ability to meet the borough's objectively-assessed need for employment land, together with its inability to meet its full housing need, constitute exceptional circumstances at strategic level. The findings of the Green Belt assessment that some parcels are capable of being reviewed, together with an assessment of the sustainability and developability of such parcels, has demonstrated site-level exceptional circumstances in some cases. In arriving at these conclusions, the Council has carried out an extremely thorough and robust</p>

Local Plan Amendments – Other		
Respondent	Representation Summary	Council Response
	<p>capacity, a tightening of the limited release set out in the published London Plan.</p>	<p>exercise to scrutinise potential sources of land supply from land outside the Green Belt, including on brownfield sites and in town centres. This exercise, which is detailed in the evidence base, has not found a supply of land sufficient to bridge the gaps in the borough's ability to meet its full objectively-assessed need.</p> <p>Council policy seeks to ensure that the development particularly for affordable housing provide a range of unit sizes for new housing in proportions reflecting local need.</p> <p>A comprehensive plan for our employment land, in line with emerging new London Plan policies E4 to E7, has been undertaken to inform our employment policies and additional information is set out in the Strategic Employment Background Paper.</p>
D. Freeman (Individual)	<p>Respondent raises concern over lack of teacher on-site parking spaces permitted at the new Park Road 1200 pupil Green School for boys and posits teachers will need to use cars to travel to work. The respondent raises the issue of the development of the telephone exchange and the probable 10+ storey development on Gillette Corner plus the thousands of flats being built without adequate parking on the London Road, Twickenham Road and Brentford.</p> <p>Respondent states that this area is full and that the roads, schools, police, hospitals, social care systems and utilities cannot cope any more to fulfil political promises and a diminishing demand model.</p> <p>Respondent states that the build is a example of greed not need and will end access to the river frontage.</p>	Comment noted
West Chiswick and Gunnersbury Society (Community Group)	The explanation provided in para 1.13 of the GWC of the eventual composition of the Local Plan once the two partial reviews are completed is helpful. It is recommended that, when Volumes 3 and 4	Comment noted and a draft Hounslow Development Plans Policy Matrix is set out in the Local Development Scheme (LDS).

Local Plan Amendments – Other		
Respondent	Representation Summary	Council Response
	are incorporated, a statement is provided within a revised Introduction to the Local Plan to clarify that development in the areas covered by either Volume 3 or 4 is still subject to the over-arching policies in Volume 1 and that Volumes 3 and 4 provide supplementary policies appropriate to the specific area.	

## Detailed summary of the consultation responses on the minor amendments to the Site Allocations and our response to the issues raised

Local Plan Amendments – New Site Allocations		
Respondent	Representation Summary	Council Response
LaSalle Investment Management (Company)	<p>We welcome and support the proposed allocation of 27 Great West Road and 1053 Great West Road for mixed use development comprising housing/office/retail/other commercial uses. Our client’s extensive knowledge of the office market is that office buildings without amenities and facilities (such as cafés, restaurants, retail and gyms) located within or immediately adjacent to the offices (i.e. on site) are becoming difficult to let. Hence, the provision of amenities and facilities for offices on site is a factor which is becoming increasingly imperative to the lettability [sic] and viability of office sites and to compete with other office sites in London. As such, this should be incorporated in the 27 and 1053 Great West Road allocation so that redevelopment can deliver a commercially viable office development.</p> <p>With regard to the site’s capacity, we support that it is expressed as minimum requirements. However, we request that the figure is reviewed and increased, as we consider that the Council’s approach to tall buildings meant that tall buildings have not been considered in the capacity assessment for the site.</p>	<p>Comments noted. The draft allocation for the site proposes an employment-led mixed use development, Business (B1a/b), Residential (C3) and Retail (A1-A4), centred around the new Lionel Road Stadium, including. The site capacity has been considered as part of a design-led assessment which has accounted for building heights in line with the detailed design and place policies contained in the draft plan, and key evidence base documents including the Great West Corridor Masterplan 2019.</p>
The Isleworth Society (Community organisation)	<p>The Isleworth Society objects to, and requests removal of, the proposal to allocate Park Road Allotment Gardens, Isleworth, for residential development for 170 units for the following reasons:-</p> <p>Incorrect “justification” is cited intimating the land is surplus to the Council’s requirements; the Council’s latest Allotment Strategy does not substantiate this claim and acknowledges a high percentage of use of the plots available; the Northumberland Estate, owners of the land, hold a list of prospective allotment holders. GB8 of the Council’s approved Local Plan states “We will encourage continued use of allotments”.</p> <p>The proposal is contrary to the Context and Character study for the area, namely, to reflect the setting of the place including natural and human history, its identifiable forms of settlement, its buildings and its spaces, its ecology, archaeology, location and need to foster active lifestyles. The land has not previously been built upon and has been</p>	<p>Comments noted. The Council has removed this allocation from the Local Plan Review based on the issues highlighted in responses.</p>

Local Plan Amendments – New Site Allocations		
Respondent	Representation Summary	Council Response
	<p>available as allotments for over 100 years.</p> <p>The site is governed by Asset of Community Value status. Among her findings during a First Tier Tribunal following the Northumberland Estate’s appeal over grant of ACV, when the status was upheld, Judge Findlay stated “I am satisfied the allotment land not only provides recreation and food for its direct users but also community benefits of green space and concomitant benefits to air quality and visual amenity”.</p> <p>The site is designated as Open Space.</p> <p>The proposal is contrary to the approved Local Plan 2015 Spatial Strategy statement “Isleworth derives much of its special character from its relationship with the River Thames”. The site contributes to a green corridor from the Thames, is within the flood plain and prone to flooding.</p> <p>The proposal is contrary to the approved Local Plan 2015 statement that “the grouping of All Saints’ churchyard, Park Road Allotments and Park Road cemetery provides an historic Open Space with a woodland of mature trees, shrubs, hedges, allotment spaces and, due to the limited footfall, a much-valued wildlife haven”.</p> <p>It is contrary to the approved Local Plan 2015 Spatial Strategy statement for Isleworth that “There is little room for new development and this is reflected in the planning approach which focuses on safeguarding and promoting the established character”.</p> <p>The site has a poor PTaL rating</p> <p>The proposal will be the equivalent to implanting a new village within an existing small village enclave to double its size.</p>	
Friends of Northcote Nature Reserve (Community organisation)	<p>We are horrified by the proposal in these amendments to encourage building on the Park Road Allotments when it is only recently that the planning application from the Northumberland Estate was rejected by Hounslow’s planning committee.</p> <p>Hounslow cannot on the one hand make statements in the approved Local Plan that they ‘encourage continued use of allotments’ and then do a complete volte face in these amendments which would be to the detriment of the area and to the local residents and, especially, the</p>	Comments noted. The Council has removed this allocation from the Local Plan Review based on the issues highlighted in responses.

Local Plan Amendments – New Site Allocations		
Respondent	Representation Summary	Council Response
	<p>current allotment holders.</p> <p>The fact that The Isleworth Society worked to have this site declared an Asset of Community Value appears to have been completely overlooked as does its status as Open Space, more important than ever in the light of such extensive development in Isleworth.</p> <p>We know as a local group how important it is to look after and promote local ecology and historic connections to the river, in our case the River Crane, in the case of the allotment site the River Thames. The relationship within this area to the nearby All Saints church and Isleworth cemetery with its listed chapel is extremely important, and encourages wildlife to thrive in a built up urban area.</p> <p>We already know of the problems regarding the sheer volume of traffic on Twickenham Rd., any development on the allotment site would inevitably mean extra vehicle use and would place even more pressure on the Busch Corner junction and public transport, this is supported by the PTaL rating.</p> <p>Local people have a right to expect that Hounslow will support them in their efforts to preserve the character and precious open spaces left in Isleworth, knowing as they do how they have been defended so recently from rapacious development. These proposals should be removed forthwith.</p>	
Park Road Allotment Association (Community organisation)	<p>Park Road Allotment Association objects to, and requests removal of, the proposal to allocate Park Road Allotment Gardens, Isleworth for residential development for 170 units for the following reasons:-</p> <p>* Incorrect “justification” is cited intimating the land is surplus to the Council’s requirements; the Council’s latest Allotment Strategy does not substantiate this claim and acknowledges a high percentage of use of the plots available; the Northumberland Estate, owners of the land, hold a list of prospective allotment holders. GB8 of the Council’s</p>	Comments noted. The Council has removed this allocation from the Local Plan Review based on the issues highlighted in responses.

Local Plan Amendments – New Site Allocations		
Respondent	Representation Summary	Council Response
	<p>approved Local Plan states “We will encourage continued use of allotments”.</p> <ul style="list-style-type: none"> <li>* It is contrary to the Context and Character study for the area, namely, to reflect the setting of the place including natural and human history, its identifiable forms of settlement, its buildings and its spaces, its ecology, archaeology, location and need to foster active lifestyles. The land has not previously been built upon and has been available as allotments for over 100 years.</li> <li>* The site is governed by Asset of Community Value status.</li> <li>* The site is designated as Open Space.</li> <li>* The proposal is contrary to the approved Local Plan 2015 Spatial Strategy statement “Isleworth derives much of its special character from its relationship with the with the River Thames”; the site is adjacent to the Thames, within the flood plain and prone to flooding.</li> <li>* The proposal is contrary to the approved Local Plan 2015 statement that the grouping of All Saints’ churchyard, Park Road Allotments and Park Road cemetery provides an historic Open Space with a woodland of mature trees, shrubs, hedges, allotment spaces and, due to the limited footfall, a much-valued wildlife haven.</li> <li>* It is contrary to the approved Local Plan 2015 Spatial Strategy statement for Isleworth that “There is little room for new development and this is reflected in the planning approach which focuses on safeguarding and promoting the established character.</li> <li>* The site has a poor PTaL rating</li> <li>* The proposal will be the equivalent to implanting a new village within an existing small village enclave to double its size.</li> </ul>	

Local Plan Amendments – New Site Allocations		
Respondent	Representation Summary	Council Response
S. Hurton (Individual)	<p>I sent in an object on behalf of the allotment association. I would also like to register an objection as a resident who lives close to the allotment.</p> <p>I object to, and requests removal of, the proposal to allocate Park Road Allotment Gardens, Isleworth for residential development for 170 units for the following reasons:-</p> <ul style="list-style-type: none"> <li>* Incorrect “justification” is cited intimating the land is surplus to the Council’s requirements; the Council’s latest Allotment Strategy does not substantiate this claim and acknowledges a high percentage of use of the plots available; the Northumberland Estate, owners of the land, hold a list of prospective allotment holders. GB8 of the Council’s approved Local Plan states “We will encourage continued use of allotments”.</li> <li>* It is contrary to the Context and Character study for the area, namely, to reflect the setting of the place including natural and human history, its identifiable forms of settlement, its buildings and its spaces, its ecology, archaeology, location and need to foster active lifestyles. The land has not previously been built upon and has been available as allotments for over 100 years.</li> <li>* The site is governed by Asset of Community Value status.</li> <li>* The site is designated as Open Space.</li> <li>* The proposal is contrary to the approved Local Plan 2015 Spatial Strategy statement “Isleworth derives much of its special character from its relationship with the with the River Thames”; the site is</li> </ul>	<p>Comments noted. The Council has removed this allocation from the Local Plan Review based on the issues highlighted in responses.</p>

Local Plan Amendments – New Site Allocations		
Respondent	Representation Summary	Council Response
	<p>adjacent to the Thames, within the flood plain and prone to flooding.</p> <p>* The proposal is contrary to the approved Local Plan 2015 statement that the grouping of All Saints’ churchyard, Park Road Allotments and Park Road cemetery provides an historic Open Space with a woodland of mature trees, shrubs, hedges, allotment spaces and, due to the limited footfall, a much-valued wildlife haven.</p> <p>* It is contrary to the approved Local Plan 2015 Spatial Strategy statement for Isleworth that “There is little room for new development and this is reflected in the planning approach which focuses on safeguarding and promoting the established character.</p> <p>* The site has a poor PTaL rating</p> <p>* The proposal will be the equivalent to implanting a new village within an existing small village enclave to double its size.</p>	
C. Beesemyer (Individual)	<p>I object to ANY building on the allotments in Isleworth because it is one of only a few green sites left, no building should be allowed and the allotments should remain for the best interests of the community. The allotments are an asset to the Isleworth community whereas the development of green space is feeding into the greed that is the Duke of Northumberland, a family wealthier than the queen. The infrastructure of Isleworth cannot deal with anymore development.</p>	<p>Comments noted. The Council has removed this allocation from the Local Plan Review based on the issues highlighted in responses.</p>
D. Freeman (Individual)	<p>The respondent strongly objects to allocation of Park Road Allotments for development and questions the Council’s approach to conservation.</p> <p>The respondent notes that councillors voted against the original plan for this site and questions why it is now allocated given the level of objection raised previously. The respondent states that new trends are</p>	<p>Comments noted. The Council has removed this allocation from the Local Plan Review based on the issues highlighted in responses.</p>

Local Plan Amendments – New Site Allocations		
Respondent	Representation Summary	Council Response
	<p>seeing a drop for this kind of development and a reduction of the population.</p> <p>The respondent states that they are a 25 year plot holder an adjoining resident. The resident states they currently enjoy access via a 300+ year pedestrian entrance from the listed garden wall which has been ignored by designers. The respondent states that the council were fully aware of this and question whether their right of way is recognised or whether alternative access has been considered.</p> <p>The respondent notes a large sycamore tree on the site directly beyond their garden and requests that no accident or design will harm this tree which will afford some visual protection from the development.</p> <p>The respondent states that the loss of a traditional and well-loved site and the building of this development would have a massive and ongoing negative effect on residents, businesses and the West Middlesex Hospital. The respondent notes the council's own document on allotments clearly shows a great demand for them on the East side of the borough and states the Estate's alternative location is a badly sited, unwanted and cynical proposition which will be over policed and likely abandoned completely after a short time. The respondent notes other representations for the 'alternative allotments site' agrees with sentiments and arguments expressed.</p> <p>The respondent notes the number of vehicle movements and the need for on road parking spaces will hugely increase during and after the build. The respondent states that the least residents can expect is 2 years construction noise and disturbance and that this would need to dovetail with the separate teams working on the South Street development, the Green School expansion and the telephone exchange all looking for daily parking. Respondent expresses concern for the cumulative effect upon the transport network.</p>	

Local Plan Amendments – New Site Allocations		
Respondent	Representation Summary	Council Response
	<p>The respondent states that the high probability of sharers rather than families means lots more vehicles parking than the hoped for corporate let model, and argues that with recent and future political changes, the need for a rental village of this sort is diminished– evidenced by the fact that the number of empty flats to rent in the private sector has massively increased. The respondent states local residents will be forced to demand a CPZ across Old Isleworth, to include Park Road, Church Street, Snowy Fielder Waye, North Street and the Lower Square and every street off the Twickenham and London roads and to include the whole of the Syon Estate north of the A315 towards Brentford. This CPZ will reduce the roadspace for parking hugely and will need to be 24/7 to allow long standing residents to continue their lives. The respondent considers this would lead to adverse impacts upon the London Apprentice, the All Saints Church and nursery, the street markets and parties, shops, office based businesses, and result in massive staffing problems for the West Middlesex hospital as no daily and low paid staff will have anywhere free to park. The respondent notes the Council had previously deleted a six storey, fully costed car park for staff within the West Middlesex Hospital PFI plans.</p> <p>The respondent states that if the Northumberland Estate is trying to use this development to enable the refurbishment and upkeep of Syon House then a correctly and independently audited account of subsequent rental profit should be presented to the council year on year to make sure that every single penny is spent on such. The respondent suggests that the condition that this rental estate should be given to the National Trust in the event of such a sale.</p>	
Osterley & Wyke Green Residents' Association (Community Orgainsation)	<p>Osterley Station Car Park. We are very concerned that the consultation over the Great West Corridor is being used to propose development possibilities outside of the Corridor. A case in point is the suggestion (page 33 of the Amendments to Volume 1 &amp; 2 of Local Plan) that the Osterley Station car park would be a suitable site for the development of 40 flats.</p> <p>It is stated, without evidence, that this site seems to be surplus to the</p>	<p>Comments noted. Osterley Station Car Park was identified through the Call for Sites exercise by the land owner and operator. The site is considered a highly sustainable location given its proximity to Public Transport networks. The council has reviewed the capacity of proposed sites given the increased housing targets in the Draft London Plan, and has considered the</p>

Local Plan Amendments – New Site Allocations		
Respondent	Representation Summary	Council Response
	<p>requirements of TfL. Has potential to help meet our London Plan housing target during the plan period;</p> <p>How can a car park which is used to capacity be surplus to requirements? The pressure on the car park has greatly increased because of the implementation of CPZs in most of the adjoining streets (often specifically designed to keep out commuters). It is said that some spaces would be retained for commuters but we are not told how many. It is impossible to respond to such vague and unsubstantiated planning proposals.</p> <p>It is further claimed w.r.t. the context and constraints for the site that Thornbury Park which is a designated Local Open Space is located due south of the site, behind residential development on the southern flank of the A4.</p> <p>It is not at all clear why Thornbury Park should be given as “context” for a possible development since it is on the opposite side of the A4 whereas Osterley Park and Jersey Gardens are on the same side. Be that as it may it is further suggested that</p> <p>The mid GLA density range for Urban with PTAL 2-3 is 55-145 u/ha. The mid-assumption of 100 u/ha of the 55-145 has been employed)</p> <p>We believe this to be wrong since the characteristics of the area have been established in previous planning documents to be suburban and therefore the density guidelines should be the lower density range proposed in the London Plan.</p> <p>Finally, we would like to express our concern about the large increase in residential developments, both inside the Great West Corridor and beyond it, without clear discussion of the infrastructure requirements which should be planned and agreed prior to the residential developments that would depend on them.</p>	<p>suggestions around appropriate densities. The Local Plan reviews contain clear policies around ensuring that new developments in the area is supported by infrastructure required to support growth and ensure sustainable development (both in terms of transport and community infrastructure).</p>
D. Freeman (Individual)	<p>Respondent expresses frustration that the Park Road allotment site has been allocated as a part of the Local Plan review proposals and raises a strong objection to any other development plans for this site. The respondent consider the allocation of this site would lead to extreme difficulties for, or even the future unviability of, the West Middlesex Hospital, the destruction of the London Apprentice, the damaging of</p>	<p>Comments noted. The Council has removed this allocation from the Local Plan Review based on the issues highlighted in responses.</p>

Local Plan Amendments – New Site Allocations		
Respondent	Representation Summary	Council Response
	<p>local businesses and schools, poor amenity for residents in Snowy Fielder Waye, Park Road, Church Street and environs and adversely impact upon access to the conservation riverside and wider area.</p> <p>The respondent states that the loss of a traditional and well-loved site the building of this ‘rental village’ would have a massive effect on the natural landscape, wildlife and the healthy recreational pastime of many, many people. The respondent notes the presence of pockets of the German Hairy Snails all over the site as well as other valued flora and fauna, and the heritage value of the site.</p> <p>The respondent notes the high level of demand for allotments on the East side of the borough and considers that the Estate’s alternative location is badly sited within the Capability Brown protected view from the Lion Gate.</p> <p>The redpondent notes that other representors have looked more deeply into the saving of our existing allotments, and agrees with the sentiments and arguments expressed by them.</p> <p>The respondent states they are an adjoining neighbour and plot holder at the allotment and referes to existing access arrangements being detrimentally impacted by the scheme and provides a list of other objections and pointst to consider and requests that Council officers contact them to discuss the sites inclusion.</p>	
D. Freeman (Individual)	<p>The respondnent objects to, and requests removal of, the proposal to allocate Park Road Allotment Gardens, Isleworth for residential development for 170 units for svereal reasons: Incorrect justification is cited intimating the allotment land is surplus to the Council’s requirements; It is contrary to the Context and Character study for the area; The site is governed by Asset of Community Value status; The site is designated as Open Space; The proposal is contrary to the approved Local Plan 2015 Spatial Strategy; the site has a poor PTaL rating; the</p>	<p>Comments noted. The Council has removed this allocation from the Local Plan Review based on the issues highlighted in responses.</p>

Local Plan Amendments – New Site Allocations		
Respondent	Representation Summary	Council Response
	<p>proposal will be the equivalent to implanting a new village within an existing small village enclave to double its size; there is a clear and ancient water course running under the site; access to and from the site is restricted with a new 1200 pupil school built at the end of Park Road; German Hairy Snails, bats and badgers occupy the site; and, overlooking and disturbance to a hospice, hospital and many listed buildings.</p>	
<p>St John's Residents Association (Community organisation)</p>	<p>The St John's Residents Association objects to the inclusion of the Bridge Road depot site for housing as it would result in loss of employment. Additionally it currently provides a well located Council facility in the centre of the borough. The Council has yet to demonstrate how any alternative site could meet the operational needs of the Borough without any reduction in efficiency of operation.</p> <p>The St John's Residents Association object to the inclusion of the Park Road Allotments site for housing for the following reasons:</p> <ul style="list-style-type: none"> <li>• Incorrect “justification” is cited intimating the land is surplus to the Council’s requirements; the Council’s latest Allotment Strategy does not substantiate this claim and acknowledges a high percentage of use of the plots available; the Northumberland Estate, owners of the land, hold a list of prospective allotment holders. GB8 of the Council’s approved Local Plan states “We will encourage continued use of allotments”.</li> <li>• It is contrary to the Context and Character study for the area, namely, to reflect the setting of the place including natural and human history, its identifiable forms of settlement, its buildings and its spaces, its ecology, archaeology, location and need to foster active lifestyles.</li> <li>• The site is governed by Asset of Community Value status.</li> <li>• The site is designated as Open Space.</li> <li>• The proposal is contrary to the approved Local Plan 2015 Spatial Strategy statement “Isleworth derives much of its special character from its relationship with the with the River Thames”; the site is adjacent to the Thames, within the flood plain and prone to flooding.</li> <li>• The proposal is contrary to the approved Local Plan 2015 statement that the grouping of All Saints’ churchyard, Park Road Allotments and</li> </ul>	<p>Comments noted. The Bridge Road Depot site allocation has been bought forward as part of the council's depot rationalisation programme. This site will help the Council meet the increased housing target set out in the draft New London Plan London, from 822 to 2182 dwellings per year (165% increase).</p> <p>Comments noted. The Council has removed Park Road Allotments site allocation from the Local Plan Review based on the issues highlighted in responses.</p> <p>Comments noted. The Osterley Station Car Park site allocation has been remove reference to Thornbury Park. The allocation requires that 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. .</p>

Local Plan Amendments – New Site Allocations		
Respondent	Representation Summary	Council Response
	<p>Park Road cemetery provides an historic Open Space with a woodland of mature trees, shrubs, hedges, allotment spaces and, due to the limited footfall, a much-valued wildlife haven.</p> <ul style="list-style-type: none"> <li>• It is contrary to the approved Local Plan 2015 Spatial Strategy statement for Isleworth that “There is little room for new development and this is reflected in the planning approach which focuses on safeguarding and promoting the established character.</li> <li>• The site has a poor PTAL rating</li> <li>• The proposal will be the equivalent to implanting a new village within an existing small village enclave to double its size.</li> </ul> <p>The St John's Residents Association are concerned that the Car Park at Osterley could impact upon the setting of Osterley Station, a Grade II listed building. Also the reference to Thornbury Park is erroneous as this is located over half a mile away on the south side of London Road.</p>	
F. Strongman (Individual)	<p>Objection to development of Park Road allotment site The proposal is contrary to the approved Local Plan 2015 statement that the grouping of All Saints’ churchyard, Park Road Allotments and Park Road cemetery provides an historic Open Space with a woodland of mature trees, shrubs, hedges, allotment spaces and, due to the limited footfall, a much-valued wildlife haven.</p>	<p>Comments noted. The Council has removed this allocation from the Local Plan Review based on the issues highlighted in responses.</p>
Sainsbury's Supermarkets (Company)	<p>Sainsbury’s, 31 Essex Place, Chiswick, W4 5UT Sainsburys state that given the age of the store and the requirement to provide a more modern competitive retail offer than Sainsbury’s previously made representations to the most recent Call for Sites to be included as a future allocation that would contain a new foodstore mixed with new residential units. Sainsbury’s, therefore, welcomes the inclusion of their site within the proposed new site allocations within the proposed amendments to the Local Plan. However, the content and quantum set out for this site by the Amended Plan needs to be revised as it misses the requirement and opportunity ahead. Sainsbury’s does not support the detail as currently set out in the proposed allocation. To be clear, Sainsbury’s wish to continue trading from a store in this</p>	<p>Comment Noted. The Council has considered the proposed site allocation as part of the Site Allocations and Capacity Review (2019) and has made adjustments where considered appropriate to the aims of the plan.</p>

Local Plan Amendments – New Site Allocations		
Respondent	Representation Summary	Council Response
	<p>location of at least their current sales floorspace (3,500 sqm net) and should not be restricted by any future policy which would unduly hamper the increase in floorspace within the Primary Shopping Area. This would be contrary to long established national and GLA policy seeking to focus retail floorspace within town centres. To restrict or indicate a floorspace of 1,858 sqm (which is not stated whether it is net or gross) is overly restrictive and contrary to such guidance. It is not consistent with other allocations proposed within the Plan where such floorspace is not prescribed in this detail. The Plan should not prescribe the quantum of retail floorspace within such a location and as a minimum should ensure that there are no restrictions to the existing sales area being maintained or re-provided in this location.</p> <p>The site can accommodate more than the 319 residential units indicated. There is scope to increase this number to over 400 with a superstore of at least the same size and car parking as currently provided. This can be achieved through sensitive design.</p> <p>The Amended Plan needs to recognise the opportunity that this site could bring locally and in turn needs to have a bolder strategy with regard to the housing that needs to be provided.</p> <p>The Plan should also consider the opportunities that the Empire House allocation could bring if the sites were comprehensively planned together.</p>	
TfL (Government)	<p>TfL CD strongly support the draft allocation of Osterley Station as a housing site. The site is a well contained underutilised site with excellent transport accessibility and should therefore be a focus for growth. We note that the draft allocation includes the capacity for 40 homes, which equates to a density of 100 u/ha. It should be noted that the draft London Plan recommends that boroughs should optimise housing delivery on all suitable and available brownfield sites, especially at sites with PTALs of 3-6 and within 800m of a tube station. The London Plan has removed the density matrix, instead advocating a design led approach in order to maximise housing density, suggesting that for sites with a PTAL of 3 a residential management plan should be</p>	<p>Comments noted. The council has reviewed the capacity of proposed sites given the increased housing targets in the Draft London Plan. The council has considered the proposed amendments to site allocations and has made adjustments where considered appropriate to the aims of the plan.</p>

Local Plan Amendments – New Site Allocations		
Respondent	Representation Summary	Council Response
	<p>provided only when density exceeds 240 dwellings per hectare. Taking the above into account, we consider that the 40 unit figure to be conservative and should represent the very minimum number of homes that should be expected to come forwards on the site. A minimum figure of 60 to 70 homes would appear more realistic for this site.</p> <p>With regards to car parking, it should be taken into account that the draft London Plan strongly advocates for residential car parking to be restricted, with car free development being the starting place for developments that are well connected by public transport. The draft MTS and London Plan both advocate for a modal shift away from car use, which would support the reduction in the size of the commuter car park, should no harm be caused by any reduction. We would suggest therefore that the allocation includes a requirement to encourage all uses on the site to provide minimum car parking provision, provided that it is demonstrated that there would be no harmful impact upon on street parking or other services that could not be mitigated.</p> <p>TfL CD strongly support the draft allocation of Hounslow East car park site as a housing site. The site is a well contained underutilised site within a defined town centre boundary with excellent transport accessibility and should therefore be a focus for growth.</p> <p>We note that the draft allocation includes the capacity for 57 homes, which equates to a density of 260 u/ha. It should be noted that the draft London Plan recommends that boroughs should optimise housing delivery on all suitable and available brownfield sites, especially at sites with PTALs of 3-6 and within 800m of a tube station. The London Plan has removed the density matrix, instead advocating a design led approach in order to maximise housing density, suggesting that for sites with a PTAL of 6 a residential management plan should be provided only when density exceeds 405 dwellings per hectare. Taking the above into account, we consider that the 57 unit figure to be conservative and should represent the very minimum number of homes that should be expected to come forwards on the site. A minimum figure of 90 homes would appear more realistic for this site.</p>	

Local Plan Amendments – New Site Allocations		
Respondent	Representation Summary	Council Response
	<p>With regards to car parking, it should be taken into account that the draft London Plan strongly advocates for residential car parking to be restricted, with car free development being the starting place for developments that are well connected by public transport. The draft MTS and London Plan both advocate for a modal shift away from car use, which would support the reduction in the size of the commuter car park, should no harm be caused by any reduction. We would suggest therefore that the allocation includes a requirement to encourage all uses on the site to provide minimum car parking provision, provided that it is demonstrated that there would be no harmful impact upon on street parking or services that could not be mitigated.</p>	
<p>London Diocesan Fund (Company)</p>	<p>London Diocesan Fund state that consideration of a site located at Rectory Meadow, Osterley Lane Norwood Green Southall UB2 4LP should be made. The site is located to the north east of Osterley Lane, approximately 1.7 miles south of Southall town centre. The site currently comprises two grass fields divided by a small watercourse. Primary vehicular access to the site is gained via a gate at the south east of the site, off Osterley Lane. To the north and west, the site is bordered by residential properties and their gardens. To the south and east are undeveloped fields. The M4 is approximately 200m south of the site. We consider in principle an alternative residential land use for the site would be appropriate to meet local housing needs for the area. This would be subject to an architect’s feasibility study supported by necessary technical information in considering development impact and mitigation. Exact residential densities would be identified following a sensitively designed masterplan supported by a carefully thought through green infrastructure strategy given the site’s location.</p> <p>Completion 5 years PTAL 1b Estimated Gross Dwellings 84-180 Estimated Dwellings per hectare 35-75 Estimated additional housing 84-180 Site Area 2.4 ha Overall therefore, the site meets the Council’s criteria of 1) being available within the next 20 years (the site is available within 5 years) 2) exceeding 0.2 ha in area (the site is 2.4 ha in area) and 3) being capable of delivering five or more dwellings (the site has capacity for 84-180 dwellings).</p>	<p>Comment Noted. The Council has considered the proposed site allocation as part of the Site Allocations and Capacity Review (2019) and has made adjustments where considered appropriate to the aims of the plan.</p>

Local Plan Amendments – New Site Allocations		
Respondent	Representation Summary	Council Response
Boundaries Road Residents Association (Community organisation)	Boundaries Road Residents Association state that no housing should be allocated in the town centre and no housing on Marshalling yards site.	Comments noted.

Local Plan Amendments – Rest of Borough Site Allocations		
Respondent	Representation Summary	Council Response
Be Living (Company)	<p>Be Living supports the new site allocations which are included within Appendix 2, and makes specific comments on the following sites:</p> <p>Acton Lodge: On behalf of Lampton 360 Development LLP, Carter Jonas has recently submitted a planning application for the proposed redevelopment of Acton Lodge to provide 19 residential units. It is anticipated that a decision will be made by LBH in Q1 2018. Whilst the planning application has not been determined, we suggest that the allocation is amended to reflect the planning application particularly with regards to phasing as the site is deliverable prior to 2022 (subject to planning).</p> <p>Bridge Road Depot: Be Living supports the allocation of this site as it represents a highly sustainable location for residential development. It is considered that the site could contribute significantly to meeting LBH’s housing delivery targets and given its location within the Hounslow Town Centre Housing Zone, the allocation should seek to maximise development on the site in line with the Core Planning Principles set out within Paragraph 17 of the NPPF. With that in mind, and using the density guidance in the London Plan, Be Living considers that the potential capacity of this site could be increased from 145 new units and any future development should not be restricted to this number. Be Living would suggest that inclusion of the site’s potential capacity is too prescriptive and text should be amended to state “in excess of 150 units” noting that the quantum of development will be subject to design feasibility and an options appraisal. We also note that</p>	<p>Comments noted for The Acton Lodge site allocation. The Council has considered the development status on site and has decided not to take this forward as a site allocation.</p> <p>Comments noted on the Bridge Road Depot allocation. The Council has considered the proposed site allocation as part of the Site Allocations and Capacity Review (2019) and has made adjustments where considered appropriate to the aims of the plan.</p> <p>Support welcomed regarding the Land at James Street site allocation.</p>

Local Plan Amendments – Rest of Borough Site Allocations		
Respondent	Representation Summary	Council Response
	<p>this site is included as a Site Allocation within the West of Borough Local Plan review.</p> <p>James Street Allotments: Be Living supports the allocation of this Site and agrees with the details provided.</p>	
London Diocesan Fund (Company)	<p>London Diocesan Fund state that The Council should consider a site located at Rectory Meadow, Osterley Lane Norwood Green Southall UB2 4LP for allocation. The site is located to the north east of Osterley Lane, approximately 1.7 miles south of Southall town centre. The site currently comprises two grass fields divided by a small watercourse. Primary vehicular access to the site is gained via a gate at the south east of the site, off Osterley Lane. To the north and west, the site is bordered by residential properties and their gardens. To the south and east are undeveloped fields. The M4 is approximately 200m south of the site. We consider in principle an alternative residential land use for the site would be appropriate to meet local housing needs for the area. This would be subject to an architect's feasibility study supported by necessary technical information in considering development impact and mitigation. Exact residential densities would be identified following a sensitively designed masterplan supported by a carefully thought through green infrastructure strategy given the site's location. Completion 5 years PTAL 1b Estimated Gross Dwellings 84-180 Estimated Dwellings per hectare 35-75 Estimated additional housing 84-180 Site Area 2.4 ha Overall therefore, the site meets the Council's criteria of 1) being available within the next 20 years (the site is available within 5 years) 2) exceeding 0.2 ha in area (the site is 2.4 ha in area) and 3) being capable of delivering five or more dwellings (the site has capacity for 84-180 dwellings).</p>	<p>Comment Noted. The Council has considered the proposed site allocation as part of the Site Allocations and Capacity Review (2019) and has made adjustments where considered appropriate to the aims of the plan.</p>
Boundaries Road Residents Association (Community group)	<p>Boundaries Road Residents Association does not agree with proposals set out in the new site allocation for Rest of Borough (Excluding proposed new site allocations for Great West Corridor and West of Borough Local Plan Review) in Appendix 2.</p>	<p>Comments noted.</p>

Local Plan Amendments – Existing Site Allocations		
Respondent	Representation Summary	Council Response
Be Living (Company)	Be Living considers that an additional amendment should be made as follows: Hounslow Youth Centre: The site is allocated within the adopted LBH Local Plan for 'educational and community uses'. It is considered that alongside these uses, the site is also suitable for residential development due to its sustainable location and bordering land uses. It is considered that the educational requirement for the site has been superseded by a 2016 planning permission, and therefore any community facilities could be provided as part of a mixed use development to also provide residential development.	Comments noted. As part of the Local Plan Reviews and in light of the Draft London Plan, the council has re-examined proposed uses and capacity of the Land at Kingsley Road site.
Queens Park Rangers Football Club (Company)	Queens Park Rangers Football Club (QPR) state that in conjunction with their representations they would suggest that the Cranford Community College be added to the site allocations to reflect its use as an educational community and sports facility. QPR is supportive of the addition of the sub paragraph h to policy C12 on p180 of the Existing Local Plan which states as follows: '(h) Supporting the dual use of educational and community facilities, particularly the use of schools after hours, for a mix of sporting, social, cultural and recreational uses. New school facilities should also be designed to allow for use by the local community where possible.'	Comments noted. The site has not been taken forward as a site allocation. However, the Council's new WoB Health and Wellbeing policy WoB3 supports co-location and uses on community sites, therefore if this site was to come forward for re-development, policy is in place to allow for dual use as recommended. Please note in light of the review of the London Plan, the Council has decided not to proceed with minor amendments to the Local Plan at this time. The Council has set out an indicative timetable for the review of the whole Local Plan in the Local Development Scheme (LDS)
Boundaries Road Residents Association (Community organisation)	Boundaries Road Residents Association state that they would like to comment on the amendments of existing Local Plan Site Allocations (Volume 2) set out in Part 2	Comment noted.

Local Plan Amendments – Existing Site Allocations		
Respondent	Respondent	Respondent
Be Living (Company)	Be Living state that, in addition to the sites identified and allocated within the Local Plan Review – Rest of Borough, the following site should also be allocated as it can help deliver residential development that will assist LBH in meeting and exceeding the minimum housing delivery targets set by the GLA:	Comment noted. Due to the assessed capacity of the site it has not been taken forward as a site allocation at this time. However the Council will consider an assessment of this site as part of the Brownfield Register.

Local Plan Amendments – Existing Site Allocations		
Respondent	Respondent	Respondent
	<p>Montague Road Car Park: The car park is located within Hounslow Town Centre and provides approximately 30 public parking spaces. The site would be ideal for residential development due to its highly sustainable location within the designated Town Centre. The site has previously been identified within the Hounslow Town Centre Masterplan as Opportunity Site 5 for redevelopment to provide residential uses. It is considered that the Site is deliverable in the medium term and the site is linked to the development of Hounslow High Street Quarter. A plan identifying the site is enclosed in their representation.</p>	
TfL (Government)	<p>TfL state that their 2016 Call for Sites submission included the site referred to as ‘Land at Princes Way’, which is not currently proposed as a site allocation. TfL consider that this is an underutilised site without any established land use, and aside from being within a Conservation Area it has no other particular land use designation. Development of the site to optimise the best use of brownfield land should therefore be supported. A range of land uses would likely be supported at the site. We again requested therefore that this site should be considered as an additional housing, mixed use or employment allocation in order to assist the council in meeting their strategic targets.</p>	<p>Comment Noted. The Council has considered the proposed site allocation as part of the Site Allocations and Capacity Review (2019) and has made adjustments where considered appropriate to the aims of the plan. Vacant Land R/O Princes Avenue, Gunnersbury (Site 94) has been allocated for residential development.</p>
London Diocesan Fund	<p>London Diocesan Fund provide a cover letter relating to a site located at Rectory Meadow, Osterley Lane Norwood Green Southall UB2 4LP which they recommend should be considered for allocation. The site is located to the north east of Osterley Lane, approximately 1.7 miles south of Southall town centre. The site currently comprises two grass fields divided by a small watercourse. Primary vehicular access to the site is gained via a gate at the south east of the site, off Osterley Lane. To the north and west, the site is bordered by residential properties and their gardens. To the south and east are undeveloped fields. The M4 is approximately 200m south of the site. We consider in principle an alternative residential land use for the site would be appropriate to meet local housing needs for the area. This would be subject to an architect’s feasibility study supported by necessary technical information in considering development impact and mitigation. Exact</p>	<p>Comment Noted. The Council has considered the proposed site allocation as part of the Site Allocations and Capacity Review (2019) and has made adjustments where considered appropriate to the aims of the plan.</p>

Local Plan Amendments – Existing Site Allocations		
Respondent	Respondent	Respondent
	<p>residential densities would be identified following a sensitively designed masterplan supported by a carefully thought through green infrastructure strategy given the site’s location. Completion 5 years PTAL 1b Estimated Gross Dwellings 84-180 Estimated Dwellings per hectare 35-75 Estimated additional housing 84-180 Site Area 2.4 ha Overall therefore, the site meets the Council’s criteria of 1) being available within the next 20 years (the site is available within 5 years) 2) exceeding 0.2 ha in area (the site is 2.4 ha in area) and 3) being capable of delivering five or more dwellings (the site has capacity for 84-180 dwellings).</p>	

# Appendix D: Regulation 19 Consultation Materials

## Extract of Press Notice for Regulation 19 Local Plan Reviews Consultation

facebook.com/GetWestLondon

FRIDAY, JULY 26, 2019 CHRONICLE & INFORMER 33

### Public Notices

#### Legal Notices

**FRANCIS JOHN FREDERICK DYMOND (Deceased)**  
Pursuant to the Trustee Act 1925 any persons having a claim against or an interest in the Estate of the above-mentioned deceased, late of 81 Oatley Road South London SW 20D, who died on 02/09/2019, are required to send particulars thereof in writing to the undersigned on or before 23/09/2019, after which date the Estate will be distributed having regard only to claims and interests of which they have had notice.  
CO-OP LEGAL SERVICES LIMITED  
Atrium 550 Atrium West  
Atrium Way Boreham 0832 43D  
(Ref: 5F18754569P/Dymond/190200)

**AMARJIT SINGH SAUNDHU (Deceased)**  
Pursuant to the Trustee Act 1925 any persons having a claim against or an interest in the Estate of the above-mentioned deceased, late of 33 Dutton Road Isworth Middlesex TW7 4LU, who died on 04/12/2016, are required to send particulars thereof in writing to the undersigned on or before 04/10/2019, after which date the Estate will be distributed having regard only to claims and interests of which they have had notice.  
CO-OP LEGAL SERVICES LIMITED  
Atrium 550 Atrium West  
Atrium Way Boreham 0832 43D  
(Ref: 0ED445773P/Sandhu/190200)

#### LONDON BOROUGH OF HOUNSLOW

##### NOTICE OF REGULATION 19 CONSULTATION LOCAL PLAN REVIEWS

The London Borough of Hounslow is consulting on the Local Plan Reviews for the Great West Corridor, West of Borough and Site Allocations. The primary aims of the plans are to transform the borough's opportunity areas, to set out and allocate the required housing growth and other land use requirements for the borough and to produce policies for the determination of planning applications up to 2034.

This Regulation 19 consultation is carried out with the purpose of seeking the views of residents, businesses and stakeholders as to whether the Local Plan Reviews are legally compliant and have been positively prepared, are justified, effective and/or are consistent with national and regional policy.

Representations are invited between the 29th July and midnight on 23rd September 2019

**HOW TO COMMENT**

The consultation document and response form are available at

- The Council website <https://haveyoursay.hounslow.gov.uk/>
- Hounslow Council libraries:

Library	Location
Beavers Library	Salisbury Road Cranford, TW4 7NW
Bedfont library	Staines Road, TW14 8DB
Brentford Library	Boston Manor Road, TW8 8DW
Chiswick Library	Dukes Avenue, W42AB
Cranford Library	Bath Road, TW5 9TL
Feltham Library	High Street, TW13 4GU
Hanworth Library	Uxbridge Road, TW13 5EG
Heston Library	New Heston Road, TW5 0LW
Hounslow Library	B7 Bath Road, TW3 3EB
Isleworth Library	Twickenham Road, TW7 7EU
Osterley Library	St Mary's Crescent, TW7 4NB

Representations can also be submitted via email to: [LDF@hounslow.gov.uk](mailto:LDF@hounslow.gov.uk) or in writing to: The Spatial Planning Team, London Borough of Hounslow, Hounslow House, 7 Bath Road, Hounslow, Middlesex, TW3 3EB

We will be holding presentation events during the consultation period to give you the opportunity to speak to Hounslow officers and to find out more about the draft Local Plan reviews, for more information on dates and venues please visit our website: [www.hounslow.gov.uk/localplanreviews](http://www.hounslow.gov.uk/localplanreviews)

**LONDON BOROUGH OF HOUNSLOW**  
LOCAL AND ENVIRONMENTAL PLANNING (LOCAL DEVELOPMENT)

#### LONDON BOROUGH OF HOUNSLOW

##### Road Traffic Regulation Act 1984 Section 14(f)

##### Temporary road closure & parking restrictions - Stamford Brook Avenue, Chiswick

1. The London Borough of, Hounslow hereby gives Notice that in connection with statutory works in Stamford Brook Avenue, Chiswick, it has made an Order the effect of which will be to:

- prohibit vehicles from proceeding in Stamford Brook Avenue between its junction with Stamford Brook Road and a point outside No. 28 Stamford Brook Avenue; and
- prohibit vehicles from waiting (including loading and unloading) in Stamford Brook Avenue between its junction with Stamford Brook Road and a point outside No. 28 Stamford Brook Avenue.

2. The prohibitions will come into operation at 8am on Monday, 29 July 2019 and will remain in force until 31 December 2019 to allow for unexpected delays and possible remedial works. The works are expected to be completed by 5pm on Sunday, 8 September 2019.

3. The above prohibitions shall only apply during such times and to such extent as indicated by prescribed traffic signs.

4. Nothing in this Notice shall apply to:

- anything done with the permission or at the direction of a police constable in uniform or a Council appointed civil enforcement officer; or
- emergency service vehicles.

5. Traffic will be diverted via Stamford Brook Road, Prebend Gardens, South Side to Stamford Brook Avenue.

6. Any vehicle waiting in contravention of any restriction imposed by this Order may be removed under the provisions of the Removal and Disposal of Vehicle Regulations 1986

Dated this 26 July 2019  
Mark Frost  
Head of Transport & Environmental Strategy

#### LONDON BOROUGH OF HOUNSLOW

##### Road Traffic Regulation Act 1984 Section 14(f)

##### Temporary restrictions - Hounslow Road, Hanworth

1. The London Borough of Hounslow hereby gives Notice that to facilitate highway works it has made an Order to:

- prohibit vehicles from proceeding in the Hounslow Road service road fronting No. 40 to No. 80 Hounslow Road;
- prohibit vehicles from waiting and loading in the Hounslow Road service road fronting No. 40 to No. 80 Hounslow Road;
- suspend the one-way working in the Hounslow Road service road fronting Nos. 40 to No. 80, Hounslow Road while works are in progress; and

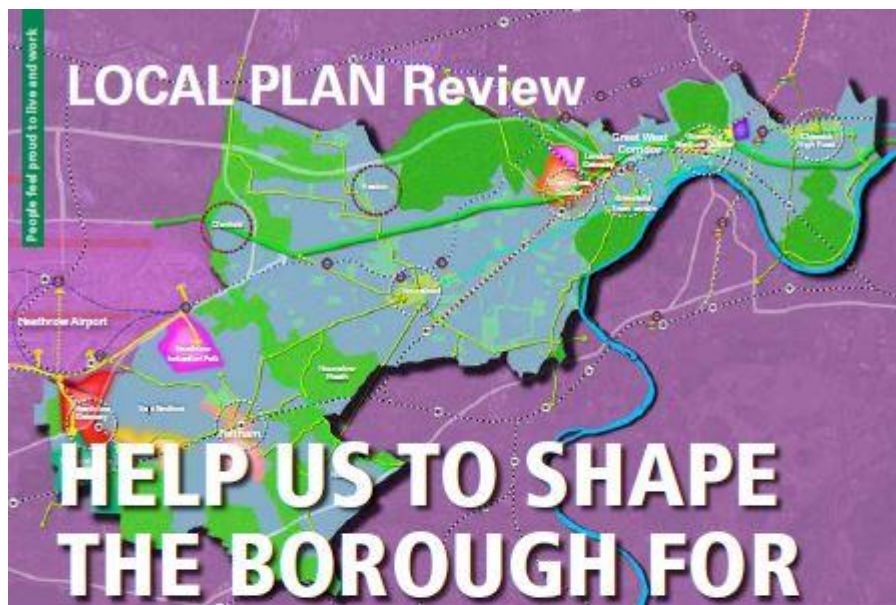
**NOTICE OF APPLICATION FOR A PREMISES LICENCE UNDER THE GAMING ACT 2005**

Notice is hereby given that Frank Lester Limited of the following address: Unit 20 Phoenix Business Park, 14 - 16 Watlington Road, Greenford, Middlesex, UB6 3JD has applied for a Adult Gaming Centre Premises Licence under section 139 of the Gaming Act 2005. The application relates to the following premises: 13 Cissy's Corner, Hounslow TW3 0HA. The application has been made to: The Licensing Manager, London Borough of Hounslow, Civic Centre, Langston Road, Hounslow TW3 4EN. Information about the application is available from the licensing authority including the arrangements for viewing the details of the application any of the following provisions: (a) representations in writing to the licensing authority about the application; (b) a person who has sufficient cause to be permitted to be affected by the authorised activities; (c) a person who has business interests that might be affected by the authorised activities; (d) a person who represents someone in any of the above two categories. Any representations must be made by the following date: 19 August 2019. It is an offence under section 142 of the Gaming Act 2005 if a person, without reasonable excuse, gives to a licensing authority for a purpose connected with that Act information which is false or misleading.

482

**Extracts of Articles/Social Media Promotion for GWC and WoB Regulation 19 (draft Submission) Local Plan Reviews**

*Hounslow Matters (Summer 2019) article extract:*



# HELP US TO SHAPE THE BOROUGH FOR THE FUTURE

After extensive community engagement over the past 18 months, the council has prepared Local Plan reviews for the Great West Corridor and West of Borough. Our ambition is to transform these 'Opportunity Areas' and deliver sufficient homes, schools, health provision, jobs, transport infrastructure and green spaces for the future.

We have listened to your feedback and made some changes, and the final version of the Local Plans for the two areas are now out for consultation, before we submit them to the Secretary of State for examination and subsequent adoption.

The consultation will run from 8 July to 15 September, with a range of consultation events and workshops taking place where you can tell us if we have got the right mix for each of the areas. You can also follow us on Twitter, Instagram and Facebook, or visit [www.hounslow.gov.uk/localplanreviews](http://www.hounslow.gov.uk/localplanreviews) to find out more.

## THE GREAT WEST CORRIDOR PLAN AIMS TO:

- Deliver at least 7,500 new homes and 14,000 new jobs
- Reinvigorate the Golden Mile as a 21st century business hub
- Create more mixed-use developments, integrating homes and businesses
- Reduce car reliance and create a walkable place with access to good public transport - a new West London Orbital Link station at Lionel Road and new Golden Mile (Brentford) station which links to Southall Crossrail station
- Support the creation of high quality public realm to improve the environment and better integrate the corridor with its surroundings
- Create clean air walks and quiet ways parallel to the M4/A4, connecting



Artist Impression of Brentford station



Artist Impression of Brentford station

new developments: to Brentford town centre, stations, open spaces and community facilities

- Conserve and enhance the historic environment and promote development that celebrates the area's heritage, creating a distinctive arrival experience and journey along the M4 and A4, welcoming visitors into London.

**THE WEST OF BOROUGH PLAN AIMS TO:**

- Deliver at least 12,000 new homes and 11,000 new jobs
- Maximise opportunities and minimise potential negative impacts of the area's proximity to Heathrow
- Unlock the potential of development sites that could benefit from enhanced public transport accessibility and a new Southern Rail Access and station at Clockhouse Roundabout
- Provide well designed affordable housing to meet the needs of all the community
- Increase jobs in the area, including airport-related and other logistics and industrial uses, as well as office and retail-based jobs
- Expand the evening economy and enhance the physical environment of Feltham Town Centre and other existing centres, bringing in more investment
- Deliver development that responds to the area's character and connects fragmented neighbourhoods
- Create a well connected, safe and attractive network of walking and cycling routes through the area
- Deliver high quality, well managed parks and opens spaces and develop more multi-functional uses for play and sports events, as well as green corridors and nature trails
- Work with partners to improve road networks and connectivity across the area
- Deliver high quality and accessible infrastructure including new schools and community hubs for healthcare, sports and leisure.

The proposals are ambitious, but we believe we can build a better borough by setting out this blueprint for the future.

Visit [www.hounslow.gov.uk/localplanreviews](http://www.hounslow.gov.uk/localplanreviews) for more about the Local Plan Reviews

# PLANNING OPPORTUNITIES FOR COMMUNITY INVESTMENT

Community projects across the borough received a £9.6m boost thanks to developer contributions to the Community Infrastructure Levy (CIL) and Section 106, supporting or mitigating against the impact of developments. Benefits include initiatives around parks and leisure, health, transport, heritage, housing, and community projects.

Funds for 2019 are more than double last year's, which allowed a number of projects to get started in 2018. One project was Hounslow Men's Shed (HMS) which, with a £30,000 investment, was able to refurbish the chapel and buildings at Iskworth Cemetery. They run workshops for members within a social environment to avoid issues of social isolation and depression.



**Some of the projects that received funding for 2019-20 include:**

- Dukes Meadows restoration programme: the reconnection of the Thames Path via a pedestrian bridge; improved landscaping; redevelopment of Chiswick Boathouse for water sports; and restoration of the bandstand, to enhance the heritage and cultural value of the site.
- Improvements to active spaces, to have a positive impact on health and wellbeing; increasing opportunities for families to get active.
- Highway safety and cycle improvements on Bath Road, supporting the shift to sustainable modes of transport.
- The Our Feltham project, which focuses on improving the connections between the High Street's public spaces; reconnecting Feltham Green with the High Street.
- A Participatory Arts programme of music and dance on our older people and children's wards at West Middlesex University Hospital.
- Improving environmental well-being in Hoston by creating an Ecohub for community planting, residents' meeting point for 'greening', and training for cleaning.
- A Community Sports Hub project at Chiswick Rugby Club to offer rugby to the wider community including young children and females.

More details on the 2019-20 projects are available in the April Cabinet report (CEX328) on the website.

(link to Hounslow Matters Summer 2019 issue: <https://hounslow.app.box.com/s/q01prslqi0vmiznf3w54a7tzze9q3kxi>)

**@LBofHounslow Twitter (extract):**

**Hounslow Council**   
@LBofHounslow

Hounslow Local Plan Reviews Regulation 19 Consultation - Drop-in sessions and workshops to find out more about the draft Local Plan reviews.  
Wednesday 11 Sep, Commerce Rd, London TW8 8GA  
Drop in Session - 3pm to 7:30pm



10:10 am · 25 Aug 2019 · Hootsuite Inc.

1 Retweet 2 Likes

**Hounslow Council**   
@LBofHounslow

Last chance to attend the Hounslow Local Plan Reviews Regulation 19 Consultation workshop, today from 3pm at Feltham Library.

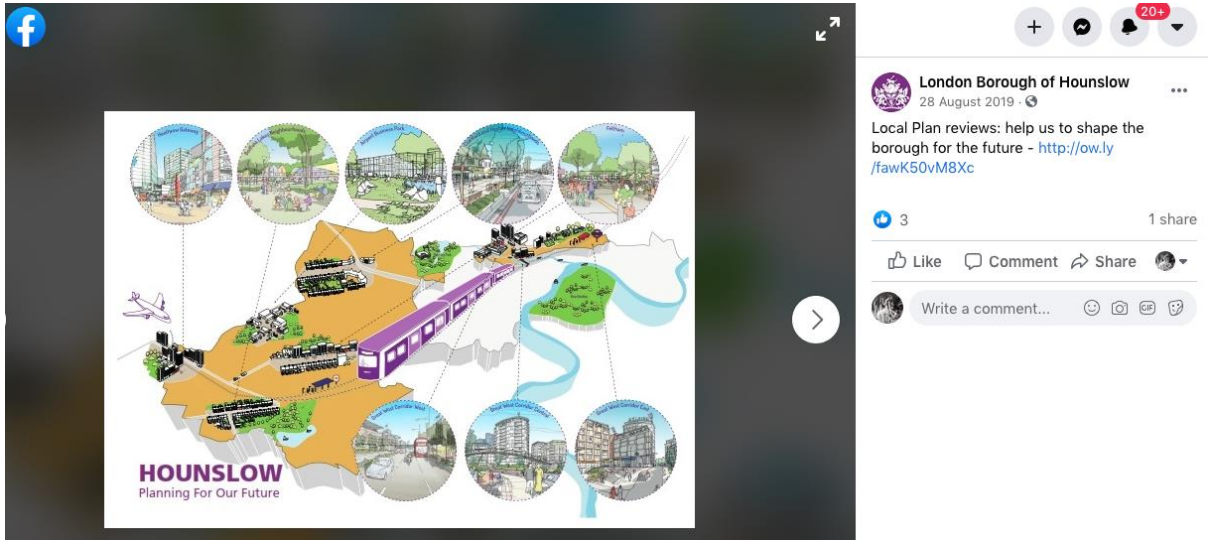


8:35 am · 9 Sep 2019 · Hootsuite Inc.

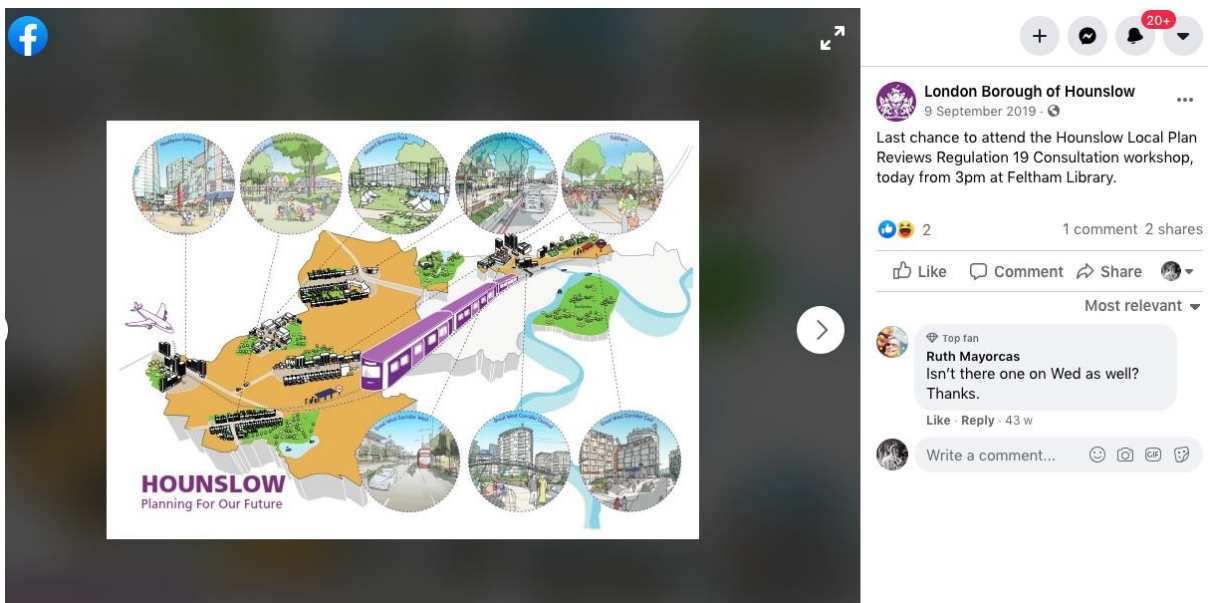
4 Retweets 3 Likes

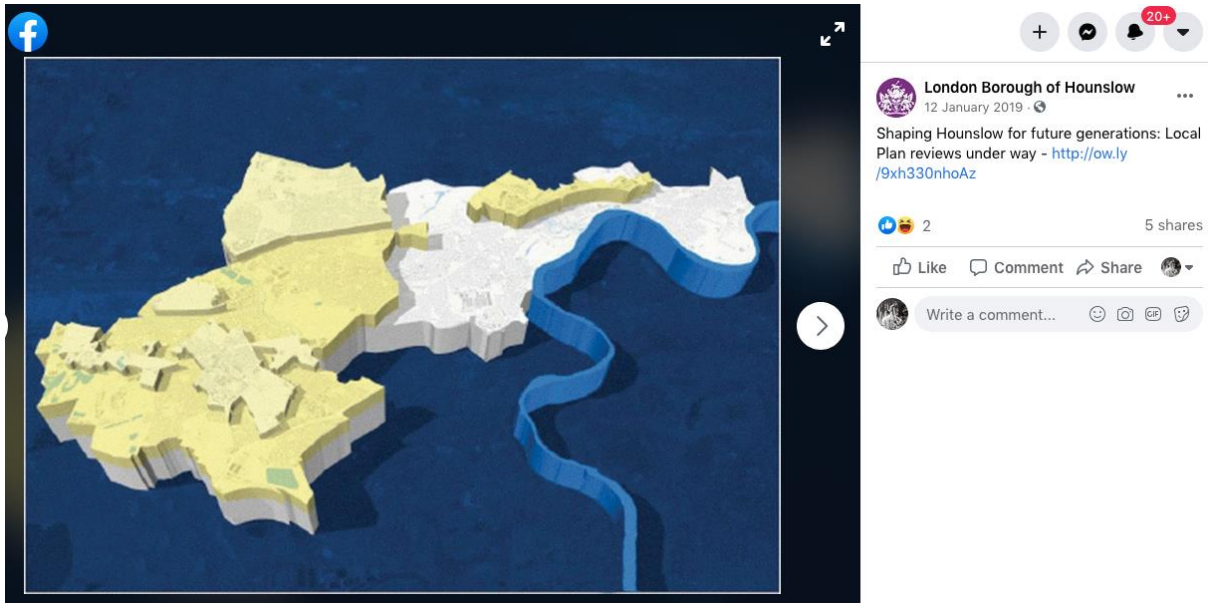
**LB Hounslow Facebook page posts:**



Consultation announcement (posted 28<sup>th</sup> August 2019)




West of Borough LPR Workshop reminder (posted 9<sup>th</sup> September 2019)



Pre-Regulation 19 consultation workshop sessions post (12<sup>th</sup> Januray 2019)

## LBH website – Council News article

 London Borough of Hounslow

SELECT LANGUAGE | ACCESSIBILITY

ACCOUNT | SEARCH

### Coronavirus advice, support and Community Hub

LATEST ON KEEPING SAFE, ACCESSING SUPPORT AND LOCAL SERVICES

Home / Latest news / Local Plan reviews help us to shape the borough for the future

## Local Plan reviews: help us to shape the borough for the future


After extensive community engagement over the past 18 months, the council has prepared Local Plan reviews for the Great West Corridor and West of Borough and is seeking views.

Published: Wednesday, 28th August 2019

NEWS ARCHIVE

RSS FEED

After extensive community engagement over the past 18 months, the council has prepared Local Plan reviews for the Great West Corridor and West of Borough and is seeking views from residents and businesses.



The final draft plans, which cover the Great West Corridor, West of Borough and other boroughwide sites, have been compiled with input from residents. The blueprint reflects a shared vision for a brighter future for Hounslow, which will transform 'Opportunity Areas' and deliver sufficient homes, schools, health provision, jobs, transport infrastructure and green spaces for the future creating a great place to live, run a business or work in.

Some changes to the plans were made after the engagement events, and the final version of the Local Plan for the two areas are now out for consultation before they are sent to the Secretary of State for examination and subsequent adoption.

The consultation will run until midnight on 24 September 2019, with a range of consultation events and workshops taking place so residents across the borough can tell the council if each area has the right mix of amenities.

Drop-in sessions and workshops will take place in Feltham and Holiday Inn, Brentford Lock, where visitors can speak to Hounslow officers and find out more about the draft Local Plan reviews.

### West of Borough Local Plan Review Drop in Session and Workshop

Monday 9 September

The Hub Feltham Library, The Centre, Feltham, TW13 4GU

Drop in: 3pm to 7.30pm

Workshop: 4pm to 7.30

### Great West Corridor Local Plan Review Drop in Session and Workshop

Wednesday 11 September

Holiday Inn, Brentford Lock, Cassinero Rd, London TW8 8GA

Drop in Session: 3pm to 7.30pm

Workshop: 4pm to 7.30pm

Councillor Steve Curran, Leader of Hounslow Council, said: "The Local Plan is effectively a blueprint for the borough's future, covering everything, from more much-needed housing so families can continue to live locally to more schools and health provision to meet the needs of growing communities. It also seeks to create more employment opportunities, and the infrastructure to underpin all the potential development, from more roads to parks and open spaces.

"The engagement events earlier this year helped us to finalise the proposals, and this consultation exercise is the last chance for residents to tell us what they think of the plans before they are formally adopted.

"Yes, it's a planning process, but one that will impact on the lives of everyone in the borough, whether you live or work here, so I hope that as many of you as possible will have a look at the proposals and give us any feedback. By planning for the future now, we can work towards a better borough for everyone."

Find out more by following us on Twitter, Instagram and Facebook, or visit [www.hounslow.gov.uk/localplanreviews](http://www.hounslow.gov.uk/localplanreviews) for full details of the proposals.

**Example email sent to consultees:**

**From:** Sobia Chaudhry <[Sobia.Chaudhry@hounslow.gov.uk](mailto:Sobia.Chaudhry@hounslow.gov.uk)>

**Sent:** 31 July 2019 16:47

**Subject:** Hounslow Local Plan Reviews Regulation 19 Consultation

Dear Consultee,

**Have your say on  
Hounslow Local Plan Reviews Regulation 19 Consultation –  
Tuesday 30<sup>h</sup> July to (midnight) Tuesday 24<sup>th</sup> September 2019**

The London Borough of Hounslow is consulting on the Local Plan Reviews for the Great West Corridor, West of Borough and Site Allocations. The primary aims of the plans are to transform the borough's opportunity areas, to set out and allocate the required housing growth and other land use requirements for the borough and to produce policies for the determination of planning applications up to 2034.

This round of consultation builds on the Regulation 18 consultation which took place between October to December 2017 and an Issues Consultation which took place in December to February 2016. Feedback from these earlier consultations have been analysed and taken account of in this version of the plan. Together with findings from our evidence base and National and London Plan policies and guidance.

The London Borough of Hounslow would like to thank you for your support and involvement so far and invite you once again to comment on our plans before we submit them to Secretary of State for examination. The purpose of this consultation is to seek the views of residents, businesses and stakeholders as to whether the Local Plan Reviews are legally compliant and have been positively prepared, are justified, effective and/or are consistent with national and regional policy.

As part of the consultation, we will be holding drop-in sessions and workshops to give you the opportunity to speak to Hounslow officers and to find out more about the draft Local Plan reviews.

- **West of Borough Local Plan Review Drop in Session and Workshop**

**Monday 9th September 2019**

The Hub Feltham Library, The Centre, Feltham, TW13 4GU

Drop in Session - 3pm to 7:30pm

Workshop - 6pm to 7:30pm

- **Great West Corridor Local Plan Review Drop in Session and Workshop**

**Wednesday 11th September 2019**

Holiday Inn, Brentford Lock, Commerce Rd, London TW8 8GA

Drop in Session - 3pm to 7:30pm

Workshop - 6pm to 7:30pm

A copy of the Local Plan Reviews and supporting documents can be found at the following address – [https://www.hounslow.gov.uk/info/20167/local\\_plan/1545/local\\_plan\\_reviews/2](https://www.hounslow.gov.uk/info/20167/local_plan/1545/local_plan_reviews/2)

-

## HOW TO COMMENT

Please send us your representations using our online consultation web page - <https://haveyoursay.hounslow.gov.uk/>. This is the Council's preferred method for receiving representations, if you do not have access to a computer, a paper form can be obtained by contacting the Council.

You can also submit your comments to us in writing by email or post - please send any comments to us (quoting: 'Regulation 19 consultation – Local Plan Reviews')

- By email: [LDF@hounslow.gov.uk](mailto:LDF@hounslow.gov.uk)
- By post: Spatial Planning Team, Hounslow House, 7 Bath Road Hounslow, TW3 3EB.

The Local Plan Review documents and supporting documents are also available for inspection at Hounslow [Hounslow Council Libraries](#). Should you need this information in an alternative format, please email [LDF@hounslow.gov.uk](mailto:LDF@hounslow.gov.uk) to request this.

*Please note your comments and your name or the organisation you represent will be published on our website. However, we will not publish personal information, such as telephone numbers or email addresses.*

Yours sincerely,

Spatial Planning and Infrastructure Team

Housing, Planning and Communities

London Borough of Hounslow

Hounslow House, 7 Bath Road,

Hounslow, TW3 3EB

Follow us online: Twitter: [@LBofHounslow](https://twitter.com/LBofHounslow) and Facebook: [www.facebook.com/HounslowCouncil](https://www.facebook.com/HounslowCouncil)



**IMPORTANT:**

This email and any of its attachments are intended solely for the use of the individual or entity to whom they are addressed. If you have received this message in error you must not print, copy, use or disclose the contents to anyone. Please also delete it from your system and inform the sender of the error immediately. Emails sent and received by Richmond and Wandsworth Councils are monitored and may be subsequently disclosed to authorised third parties, in accordance with relevant legislation.

## **Example letter template sent to consultees**

Housing, Planning and Communities

Spatial Planning and Infrastructure Team

London Borough of Hounslow

Hounslow House, 7 Bath Road Hounslow,

TW3 3EB

«Initials» «Surname»

«Address\_1»

«Address\_2»

«Address\_3»

«Post\_Code»

Date: 29/07/2019

Dear Consultee,

## **Have your say on Hounslow Local Plan Reviews**

**Regulation 19 Consultation - Monday 29<sup>th</sup> July to (midnight) Monday 23<sup>rd</sup> September 2019**

The London Borough of Hounslow is consulting on the Local Plan Reviews for the Great West Corridor, West of Borough and Site Allocations. The primary aims of the plans are to transform the borough's opportunity areas, to set out and allocate the required housing growth and other land use requirements for the borough and to produce policies for the determination of planning applications up to 2034.

To date, we have published and consulted on one draft of the Local Plan Reviews; the Regulation 18 draft Local Plan Reviews (October - December 2017), this stage explored a number of different policy options, had 'open' questions and a wider remit for input during the consultation. In preparation for the next stage of consultation, the council held pre-consultation engagement sessions in January 2019. Following your responses and considering the updated and new supporting documents, we have made amendments to the Local Plan Reviews. We have also reflected policies from the Draft New London Plan and changes made to national planning guidance, which we must adhere to.

The London Borough of Hounslow would like to thank you for your support and involvement so far and invite you once again to comment on our plans before we submit them to Secretary of State for examination. We are now carrying out a Regulation 19 consultation, which is the second stage of the consultation process of a Local Plan. The purpose of this consultation is to seek the views of residents, businesses and stakeholders as to whether the Local Plan Reviews are legally compliant and have been positively prepared, are justified, effective and/or are consistent with national and regional policy.

As part of the consultation, we will be holding drop-in and workshop sessions to give you the opportunity to speak to Hounslow officers and to find out more about the draft Local Plan reviews.

- **West of Borough Local Plan Review Drop in Session and Workshop**

**Monday 9th September 2019**

The Hub Feltham Library, The Centre, Feltham, TW13 4GU

Drop in Session - 3pm to 7:30pm

Workshop - 6pm to 7:30pm

- **Great West Corridor Local Plan Review Drop in Session and Workshop**

**Wednesday 11th September 2019**

Holiday Inn, Brentford Lock, Commerce Rd, London TW8 8GA

Drop in Session - 3pm to 7:30pm

Workshop - 6pm to 7:30pm

Your representations to the Regulation 19 consultation will be submitted to the Secretary of State for the Ministry of Housing, Communities and Local Government, alongside the submission of the Local Plan Reviews for independent examination. If you have no comments on the revised draft Local Plan Reviews or the new or updated supporting studies, you don't need to do anything further.

A copy of the Local Plan Reviews and supporting documents can be found at the following address – [https://www.hounslow.gov.uk/info/20167/local\\_plan/1545/local\\_plan\\_reviews/2](https://www.hounslow.gov.uk/info/20167/local_plan/1545/local_plan_reviews/2)

## **HOW TO COMMENT**

Please send us your representations using our online consultation web page - <https://www.hounslow.gov.uk/info/20096/consultations> . This is the Council's preferred

method for receiving representations, but if you prefer to fill in a response form please return electronically wherever possible. If you do not have access to a computer, a paper form can be completed and sent to the Council. The response form can be downloaded from the Council's website or obtained by contacting the Council.

You can also submit your comments to us in writing by email or post - please send any comments to us (quoting: 'Regulation 19 consultation – Local Plan Reviews')

By email: [LDF@hounslow.gov.uk](mailto:LDF@hounslow.gov.uk)

By post: Spatial Planning Team, Hounslow House, 7 Bath Road Hounslow, TW3 3EB.

The Local Plan Review documents and supporting documents are also available for inspection at Hounslow [Hounslow Council Libraries](#). Should you need this information in an alternative format, please email [LDF@hounslow.gov.uk](mailto:LDF@hounslow.gov.uk) to request this.

Yours sincerely

Spatial Planning and Infrastructure Team

## Appendix E: 'Pre-Regulation 19' workshop summary tables

Pre-Regulation 19 Consultation - GWC Workshop Session Summary Table (Date: 24/01/2019)

Key Issues	Feedback	Response
<b>Housing and Economic Growth</b>	Remedy the Town Centre to gauge the need for growth.	Comments noted
	The council should think creatively about meeting Housing demands e.g. build for rent and co-living. The plan needs to more provision for creative industries.	Hounslow has a significant identified need for conventional homes and The Plan supports the delivery of these types of new homes. However, the plan is also in conformity with the proposals in the Draft London Plan which support Large Scale Purpose Build Shared Living Accommodation, such as build-to-rent and co-living.
<b>Employment</b>	No specific points raised in this area.	
<b>Open space</b>	No specific points raised in this area.	
<b>Health and Wellbeing</b>	New Health Centre closer to Gillette Corner to cater for extra population, halfway between Brentford HC and Thornbury Road/Spring Grove Road HC.	Comments noted
	Demand for more schools and GP surgeries.	Comments noted
<b>Heritage and Design</b>	Replace the 1920s iconic buildings on the Golden Mile with 21 <sup>st</sup> ones.	It is not clear whether this comment is requesting the 1920s buildings be replaced or retained. The latter is the preferred option and is the basis for the heritage aspects of the plan.
	The plans need to further reflect conservation and local heritage along the corridor.	It is considered that the amended policies and the masterplan will better explain the need for new development to respect the old and iconic buildings in views.
	Better lighting along canal near new residential area	Our emerging Design and Heritage policy GWC5 promotes positive enhancement to the quality of public realm throughout the area, including consideration to lighting, and this will be applied to improvements to the Canal/River Brent footpath delivered as part of development within the River Brent Quarter.
	To have fewer advertisement boards.	Comments noted
	The right infrastructure needs to be in place before development so that	Comments noted

	existing services are not pressured.	
	There are too many tower blocks and this not in keeping with heritage in Chiswick.	The Plan is based on both respecting heritage and ensuring that we can plan for and deliver on our housing and other targets. Part of the heritage of this part of the borough is for some taller iconic buildings.
	The plan should show phasing of all sites and should be timed delivery of supporting infrastructure.	The Draft Plan allocates sites and phases them in order to ensure that required Infrastructure is delivered to support growth.
<b>Connectivity</b>	Better access at Gunnersbury Station.	Comments noted
	Crossing points to have better lighting.	Comments noted
	Need for dedicated bus lanes on A4.	Comments noted
	Safety concerns around mixing pedestrians and cyclists. CS9 should remain on the A4 and Brentford High to Chiswick should not be prioritised.	Comments noted
	Objection to the proposed cycle lanes around Glenhurst and York Road as pavements not wide enough.	There may be some confusion here as the proposed parallel clean air route to the south of the A4 will be along Glenhurst Road or York Road. This is also proposed as an improved pedestrian route.
	Support for the pedestrian bridge across canal near Brentford station to serve new development.	Comments noted
	Support for Southall shuttle link.	Support welcomed
	Changes to bus routes to help improve services especially on weekends/bank holidays.	Comments noted
	Improve the timing of pedestrian lights crossing the A4. Currently pedestrians must stop in the central reservation, breathing in polluted air from traffic.	Comments noted
	Cycle lanes signage needs to be improved along with cycle routes along A315.	Comments noted
	Safety and security at train stations.	Comments noted
	Boost the economy by reviving the 'old' tourism guide.	Comments noted
	Concerns over TFL planning cuts to bus network.	Comments noted

Pre-Regulation 19 Consultation - WoB Workshop Session Summary Table (Date:31/01/2019)

<b>Key Issues</b>	<b>Feedback</b>	<b>Response</b>
<b>Housing and Economic Growth</b>	New developments should not exceed existing developments.	The Plan is based on both respecting heritage and ensuring that we can plan for and deliver on our housing and other targets. This will result in some taller buildings than those currently there, but their impact will have been tested and then further tested as part of any application process.
	Need for a mix of housing types and sizes.	The Plan sets housing types and sizes in line with the Draft London Plan.
<b>Employment</b>	No specific points raised for this area.	
<b>Open space</b>	Specific concerns for anti-social behaviour in park (drug dealing/motorbiking along pedestrian paths etc.) being exacerbated by current proposals for relaying/reorienting paths through park.	Comments noted
	Light green layer showing place policy area on Feltham Place map is very close to green colour designating 'open space'. Also suggests show-people site is being redesignated as new open space.	We are aware of this issue. This layer will be corrected in all future mapping of the Feltham area.
	Protect the greenbelt in West of Borough.	Comments noted
<b>Health and Wellbeing</b>	No specific points raised in this area.	
<b>Heritage and Design</b>	Infrastructure such as power, water, sewage needs more attention.	The Draft Plan allocates and phases sites to ensure the delivery of required infrastructure in advance of development. This information has been shared with infrastructure providers.
	CGI view of Feltham from Feltham Arenas (from Feltham Masterplan) has proven particularly contentious with residents as appears to show to shows 'clean/sanitized London Park', which does not take reflect local distinctiveness/heritage of parks.	Comments noted
	Bedfont Community Centre (Hatton Road) to be retained.	Comments noted
	Feltham place / housing / employment maps need to (more) clearly show 'show-people' site has been removed.	Mapping has been updated to clearly show removal.

	Development should be heritage led as much as possible, including protection of views.	Comments noted. This is the case.
<b>Connectivity</b>	Better links into Feltham through the bus network and the demand for more double decker buses.	Comments noted
	Proposed pedestrian/cycle bridge in Bedfont Lakes Country Park to be re-located to allow for easier access for pedestrians walking from the park into Ashford (i.e. realigning bridge/extending existing bridge crossing railway on Clock house Lane - currently narrow road only bridge with no pedestrian access).	Comments noted