

Hounslow Local Plan Examination

Hearing Statement prepared by DP9 Ltd on behalf of Bluescape Limited and Yellowscape Limited

27 April 2026

Introduction

1. This Hearing Statement has been prepared by DP9 Ltd on behalf of Bluescape Limited and Yellowscape Limited in response to Examination Document IN11: Matters, Issues and Questions (MIQs) for stage 2, published by the Inspectors on 27th March 2026.
2. It is submitted following earlier representations to the Brentford Masterplan (dated September 2023) and through the Regulation 19 stage (dated October 2024) of the London Borough of Hounslow's ("LBH") Local Plan in the context of Bluescape Limited and Yellowscape Limited's ownership of Site Allocation 110 'Albany Riverside' and Site Allocation 111 'Brentford Police Station' who own the land in a joint venture with Hounslow Council.
3. Since those representations were submitted, Bluescape Limited and Yellowscape Limited submitted Section 73 applications at the aforementioned Sites in August 2025 and received Resolution to Grant for both applications (Albany Riverside LBH Ref. P/2025/2495 and Brentford Police Station LBH ref. P/2025/2496) at Hounslow planning committee on 5th February 2026 by unanimous decision.
4. This Hearing Statement reinforces Bluescape and Yellowscape's strong support for the principle of the allocations for comprehensive residential-led redevelopment of the Sites, but requests modifications to both allocations 110 and 111 to ensure the policies are justified, effective, and consistent with national policy. These changes would ensure the draft Site



Allocations are reflective of the Section 73 applications resolved to grant at committee earlier this year.

5. It is noted that the MIQs do not identify any specific, site-related questions for Allocations 110 or 111 under Matter 9: Site Allocations which covers all site allocations. Accordingly, this Hearing Statement addresses only the key questions relevant to the Applicant and the soundness of the allocations.

Matter 9: Site Allocations

Issue 1: Whether the proposed allocation of sites in the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan?

Question 2: Is there any risk that any infrastructure requirements, site conditions and/or constraints might prevent or delay development or adversely affect viability and delivery of any of the site allocations?

Site Allocation 111 (Brentford Police Station)

6. Within the 'Minimum Development Quantum' Section, the minimum floorspace for community/cultural infrastructure is set at 2580 sqm. Since the previous Local Plan was adopted and since the 2021 consents were secured at both sites, the Watermans Art Centre has ceased to operate from the riverside site, or indeed any site. The previous consent was notionally designed to a certain brief which included, for instance, three cinema screens and a theatre. We understand that Everyman has opened a five screen cinema in Brentford.
7. As it is not realistic or feasible to host two cinema complexes in such close proximity, the 2025 Section 73 applications have been revised to deliver a comparable cultural function intended to provide equivalent benefit to local residents and contribute to the vibrancy and activation of the Brentford Police Station Site. The proposed Arts/Cultural Centre approved at committee has a floorspace of 2,327 sqm, marginally lower than the figure in the Site Allocation. Although the proposed Arts/Cultural Centre is marginally smaller than the 2021 scheme, the potential maximum capacity of the venue will be greater, therefore enhancing its ability to serve the local community. This reduced quantum is supported by officers as set out in Paragraph 8.35/8.36 of the Committee Report dated 5th February 2026.



8. This requirement should be reduced to reflect the planning application approved at committee in February 2026. The modifications are set out in answer to question 8 below.

Question 4: Are the assumptions regarding the capacity of the sites in terms of density of development and net developable areas justified and what are these based on?

Site Allocation 110 (Albany Riverside)

9. For clarity, Albany Riverside received Resolution to Grant at Hounslow planning committee for a new residential-led redevelopment providing 219 C3 homes and a 192.5 sqm commercial unit. The current identified capacity of 190 homes in Allocation 110 of the Draft Local Plan is derived from the extant planning permissions, initially submitted in 2017.
10. The higher number of homes has been justified through the heritage-led design process and has been supported by LBH officers as set out within the committee report. The capacities in the Site Allocations should therefore be amended. These modifications are set out in answer to question 8 below.

Site Allocation 111 (Brentford Police Station)

11. For clarity, Brentford Police Station received Resolution to Grant at Hounslow planning committee for a new residential-led redevelopment and new arts/cultural centre providing 111 homes. This Section 73 application did not include any commercial floorspace. The current identified capacity of 100 homes and a minimum of 100 sqm of commercial floorspace therefore does not align with the new planning permission.
12. The higher number of homes and reduced quantum of commercial floorspace has been justified through the thorough heritage-led design process and the uses have been supported by officers at the council. The capacities in the Site Allocations should therefore be amended to reflect the application approved at committee in February 2026. These modifications are set out in answer to question 8 below.
13. Amendments to the community/cultural floorspace is addressed in paragraphs 6 to 8 above.



Question 5: Are the expected timescales for development in terms of lead in times and annual delivery rates for each site allocation, realistic and supported by evidence?

14. The phasing in the draft Local Plan for Albany Riverside is 2025 – 2031 and for Brentford Police Station is 2025 – 2029. Giving the timings of the new S73 applications and the S106 amendments to de-link the applications, these timescales are no longer realistic nor supported by evidence.
15. Informed by the outline construction programme which has informed the wording of S106 changes, amendments should be made to ensure these timescales are realistic. These modifications are set out in answer to question 8 below.

Question 7: Are the proposed allocations and the associated development requirements identified in Chapter 12 of the Plan - justified, effective, consistent with national policy and in general conformity with the London Plan?

16. Our previous representations have raised issues in relation to the soundness, effectiveness and consistency of key draft policies and the evidence base that supports these allocations. These requested amendments were needed due to the significant deliverability challenges of both sites. As with many stalled sites across the borough and wider London, these Sites have been negatively affected by significant increases in the costs of construction and changes to regulations such as the Building Safety Act.
17. Nevertheless, the applicants along with their development partners (Hounslow Council) are committed to the delivery of these sites and wish to see the substantive regeneration benefits realised on these sites. As such, these applications have been revised and have received Resolution to Grants at planning committee.
18. As drafted, there are certain elements of the draft allocations that are restrictive and do not conform with the updated deliverability requirements of these sites nor the S73 applications. Therefore, these elements of the allocations are not justified or effective.

Question 8: Are any modifications required to ensure that the individual site allocations and/or their development requirements identified in Chapter 12 of the Plan are accurate and sound?



19. Following the justification for amendments set out above, the following amendments are necessary to ensure the site allocations are justified and sound.

Site Allocation 110 (Albany Riverside)

20. To align the Site Allocations to the Section 73 applications, the Minimum Development Quantum section should be amended as follows (new text in **bold**): *Residential Units: ~~190~~ **210**. Commercial (sqm): ~~100~~ **150**.*
21. To ensure realistic timescales for delivery and align with the new timescales of the new applications, the 'Phasing' section should be amended to: *~~2025-2031~~ **2027-2032**.*
22. The S73 applications enable the reprovision of the Arts/Cultural centre within the Brentford Police Station Site, therefore, it would be far sounder if the following amendments are made to the 'Key Proposal Section': *Albany Riverside will be a new residential development with mixed-use at ground floor level making a positive contribution to the riverside and enabling re-provision of community/cultural/~~commercial~~ uses in Brentford Town Centre.*
23. The 'Movement and Access' section of the Site Allocations should be updated to reflect the current position of the London Plan and recently adopted emergency measures SPD. We therefore suggest the following amendments are made to this section: *~~The development is to conform with to the maximum parking standards in the draft London Plan while maximising access by walking, cycling or public transport.~~ **The development is to be provided in accordance with the adopted London Plan and any associated SPG's and maximise access by walking cycling or public transport.***
24. As set out in our previous representations, the draft allocation 110 is an appropriate site for tall buildings and the S73 application includes tall buildings (as per the definition in the draft Local Plan). The draft allocation should include this wording as to reflect this position. As such we suggest the draft allocation should contain a new section of building heights outside of the 'Heritage Constraints' section or included within the 'Site Requirements' section and we suggest the removal and replacement of the following text: *~~Policy CC3 sets out appropriate heights for the site. Further details on the assessment of appropriate heights are set out in the~~*



Tall Buildings Study. The site is an appropriate location for tall buildings and should respect existing heritage assets.

25. As per our previous representations we also consider that amendments should be made to the 'Heritage Constraints' Section as there is no reason to expand and repeat policy text that is set out elsewhere within the draft local plan, as such we suggest the removal of the following text from this section: ~~Development is required to conserve/preserve, and/or seek opportunities to enhance the historic environment where potential impacts upon heritage have been identified.~~

Site Allocation 111 (Brentford Police Station)

26. To align the Site Allocations to the Section 73 applications, the Minimum Development Quantum section should be amended as follows (new text in **bold**): ~~Commercial (sqm): 100.~~
~~Community/Cultural: 2580~~ **2000.**
27. The 'Site Requirements' section should then be reworded to align with this: *'Redevelopment of the site to provide a mix of residential and community/cultural/~~commercial~~ uses'*.
28. To ensure realistic timescales for delivery and align with the new timescales of the new applications, the 'Phasing' section should be amended to: ~~2025-2031~~ **2027-2032.**
29. The 'Movement and Access' section of the Site Allocations should be updated to reflect the current position of the London Plan and emergency measures SPD. We therefore suggest the following amendments are made to this section: ~~The development is to conform with to the maximum parking standards in the draft London Plan while maximising access by walking, cycling or public transport.~~ **The development is to be provided in accordance with the adopted London Plan and any associated SPG's and maximise access by walking cycling or public transport.**
30. Regarding building heights, as the S73 application included an additional two storeys on each block, taking the building heights to Ground plus 7 storeys on Block A and Ground plus 8 storeys plus plant on Block B and alike to the wording for Albany Riverside, building heights should be in its own section or the Site Requirements section. We suggest the text is written as follows: ~~Policy CC3 sets out appropriate heights for the site. Further details on the~~



*assessment of appropriate heights are set out in the Tall Buildings Study. This site is exempt to Policy CC3 (G) and is an appropriate location for a taller building with minimum heights of 8-storeys. Proposals will need to demonstrate that ~~the building heights of proposals can be achieved without causing substantial or less than substantial harm to designated heritage assets and/or their significance or that the less than substantial harm~~ **any harm to heritage assets** is outweighed by public benefits, or substantial public benefits in the case of substantial harm.*

31. As with draft allocation 110, there is no reason to expand and repeat policy explanations elsewhere, as such we suggest the removal of the following text from the 'Heritage Constraints' Section: ~~Development is required to conserve/preserve, and/or seek opportunities to enhance the historic environment where potential impacts upon heritage have been identified.~~

Summary

32. In summary, the current allocation wording for these two sites is overly prescriptive and risks undermining the effectiveness of the Plan. For these reasons, we consider that part of the allocation as drafted are not justified, not effective, and not fully consistent with national policy. It is considered that updates and clarifications are necessary to ensure the plan is 'sound' with regard to these two sites, to reflect the 2026 Section 73 Planning applications approved unanimously at committee on the 5th February 2026.