



**Examination of the Hounslow Local Plan**

**Matter 9: Site Allocations**

**Historic England, Hearing Statement**

**April 2026**

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

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

## **1 Introduction**

- 1.1. This statement addresses the Inspector's questions with regard to Matter 9 of the Hounslow Local Plan Examination: Matters, Issues and Questions.
- 1.2. This hearing statement should be read alongside Historic England's comments submitted during the Regulation 19 consultation on the Local Plan, along with our [Statement of Common Ground](#) (SoCG) with London Borough of Hounslow, dated 08/12/2025.

## 2 Matter 9: Site Allocations

### Issue:

**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?**

### Questions:

**1) Are the proposed site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts?**

**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?**

**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?**

### Response:

- 2.1. In Historic England's response to the Regulation 19 Draft Local Plan consultation, we raised concerns about the clarity of the site allocations and the need for these to accurately reflect the evidence base and be informed by an understanding of the significance of the historic environment.
- 2.2. To address this issue, while also ensuring that the plan aligns with London Plan policies D1.A and HC1.B-C, we suggested that Heritage Impact Assessments should be carried out to understand the potential impacts of proposals. London Borough of Hounslow (LBH) decided not to proceed with this recommended approach.
- 2.3. In the absence of Heritage Impact Assessments for site allocations, Historic England requested focused changes to individual site allocation policies to more consistently identify the key heritage assets that may be impacted. These include potential impacts on the Royal Botanic Gardens, Kew World Heritage Site – a heritage asset of the highest significance – as well as the heritage assets that it contains. LBH was unable to agree these changes, and it was therefore agreed in the Statement of Common Ground that they would be presented at the Examination.
- 2.4. Notwithstanding this outstanding issue, it has been possible for Historic England and LBH to agree a number of adjustments to the site allocation policies to ensure consistent use of terminology, align with national policy and

more accurately reflect the relationship between the site allocations and the evidence base. In particular, where site allocations in the Great West Corridor rely on the GWC masterplan rather than the Tall Building Study for guidance on building heights, references to the Tall Buildings Study have been removed.

2.5. We note that many of these agreed changes are not included in Examination document EX57 Post Stage 1 Hearings Version of the Schedule of Suggested Modifications. They are therefore also included in the table below for completeness.

We suggest the changes below to ensure that the plan is justified, effective and consistent with national policy:

Site allocation	
<p>“Heritage Constraints” section of the following site Allocation refs:</p> <p>1,2,3,4,5,6,7,8,9, 10,11,13,14,16, 17,18,19,21,22, 23,25,26,27,28, 29,30,32,33,34, 35,36,37,51,52, 59,62,63,64,65, 67,69,70,72,74, 77,80,81,82,83 84,90,96,98,99 100,101,102, 103,105,106, 107,110,111, 113,114,115, 116,117,118, 122,123</p>	<p>For the section variously titled "Heritage", "Heritage constraints", and "Heritage considerations" etc., replace with:</p> <p><a href="#">Heritage considerations</a></p> <p>For consistency with the NPPF:</p> <p>Development is required to conserve/<del>preserve</del>, and/<del>or</del> seek opportunities to enhance the historic environment where potential impacts upon heritage have been identified.</p>
<p>Site Allocation ref 1 Sky Campus “Heritage Constraints”</p>	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>• <a href="#">Conservation Areas: Osterley Park, <u>Grand Union Canal and Boston Manor</u></a></li> <li>• <a href="#">Registered Parks and Gardens: <u>Syon Park, Grade I and Osterley Park, Grade II*</u></a></li> <li>• <a href="#">Royal Botanic Gardens, Kew World Heritage Site and <u>associated heritage assets</u></a></li> </ul>
<p>Site Allocation 2 Tesco Osterley</p>	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>• <a href="#">Registered Parks and Gardens: <u>Osterley Park, Grade II* and Syon Park, Grade I</u></a></li> </ul>

<p>“Heritage”</p>	<ul style="list-style-type: none"> <li>• <a href="#">Royal Botanic Gardens, Kew World Heritage Site and associated heritage assets</a></li> </ul> <p>Suggested amendments to policy text for accuracy:</p> <p>Policy CC3 sets out appropriate heights for the site. Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan. <a href="#">Further details on heights associated with a recent consent are contained in the Tall Building Study. Any future proposal should explore lesser heights to reduce harm.</a></p>
<p>Site Allocation 3 Gillette Corner “Heritage Constraints”</p>	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>• <a href="#">Registered Parks and Gardens: Osterley Park, Grade II* and Syon Park, Grade I</a></li> <li>• <a href="#">Royal Botanic Gardens, Kew World Heritage Site and associated heritage assets</a></li> </ul> <p>Suggested amendments to policy text for accuracy:</p> <p>Policy CC3 sets out appropriate heights for the site. Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.</p>
<p>Site Allocation 5 West Cross Campus “Heritage Constraints”</p>	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>• Statutory listed building... <a href="#">Boston Manor House, Grade I</a></li> <li>• Registered Park and Garden: Syon Park, Grade I <a href="#">and associated heritage assets</a></li> <li>• ..</li> <li>• World Heritage Site: Royal Botanic Gardens, Kew <a href="#">and associated heritage assets</a></li> </ul> <p>Suggested amendments to policy text for accuracy:</p> <p>Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.</p>
<p>Site Allocation 6 BSS Brentford “Heritage Constraints”</p>	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>• World Heritage Site: Royal Botanic Gardens, Kew <a href="#">and associated heritage assets</a></li> </ul> <p>Suggested amendments to policy text:</p> <p>Policy CC3 sets out appropriate heights for the site. Further details on the assessment of appropriate heights are set out</p>

	in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.
Site Allocation 7 Profile West “Heritage Constraints”	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>World Heritage Site: Royal Botanic Gardens, Kew <a href="#">and associated heritage assets</a></li> </ul> <p>Suggested amendments to policy text:</p> <p>Policy CC3 sets out appropriate heights for the site. Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.</p>
Site Allocation 11 Homebase “Heritage Constraints”	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li><a href="#">Registered Park and Garden: Syon Park, Grade I and associated heritage assets</a></li> <li><a href="#">Conservation areas nearby</a></li> <li><a href="#">Royal Botanic Gardens, Kew World Heritage Site and associated heritage assets</a></li> </ul> <p>Suggested amendments to policy text:</p> <p>Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan. <a href="#">Further details on heights associated with a recent consent are contained in the Tall Building Study. Any future proposal should explore lesser heights to reduce harm.</a></p>
Site Allocation 13 Harlequin Av Substation “Heritage Constraints”	<p>Suggested amendment to policy text:</p> <p>Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.</p>
Site Allocation 16 Brentside Park “Heritage Constraints”	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>Registered Park and Garden: Syon Park, Grade I <a href="#">and associated heritage assets</a></li> <li><a href="#">Royal Botanic Gardens, Kew World Heritage Site and associated heritage assets</a></li> </ul> <p>Suggested amendment to policy text:</p> <p>Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.</p>
Site Allocation 17 Great West Plaza	Suggested amendments to heritage asset list:

<p>“Heritage Constraints”</p>	<ul style="list-style-type: none"> <li>• <a href="#">Royal Botanic Gardens, Kew World Heritage Site and associated heritage assets</a></li> </ul> <p>Suggested amendment to policy text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.</p>
<p>Site Allocation 18 Great West House “Heritage Constraints”</p>	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>• Conservation Areas: Grand Union Canal and Boston Manor, <a href="#">St Paul’s Brentford and The Butts</a></li> <li>• World Heritage Site: Royal Botanic Gardens, Kew <a href="#">and associated heritage assets</a></li> </ul> <p>Suggested amendment to policy text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.</p>
<p>Site Allocation 19 Mille Building “Heritage Constraints”</p>	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>• World Heritage Site: Royal Botanic Gardens, Kew <a href="#">and associated heritage assets</a></li> <li>• Registered Park and Garden: Syon Park, Grade <u>I</u></li> </ul> <p>Suggested additional policy text consistent with other sites: <a href="#">Policy CC3 sets out appropriate heights for the site. Further details on the assessment of appropriate heights are set out in the Great West Corridor Masterplan.</a></p>
<p>Site Allocation 23 Texaco GWR “Heritage Constraints”</p>	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>• World Heritage Site: Royal Botanic Gardens, Kew <a href="#">and associated heritage assets</a></li> </ul>
<p>Site Allocation 25 Layton Road “Heritage Constraints”</p>	<p>Suggested amendment to policy text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.</p>
<p>Site Allocation 26 Phoenix Business Park “Heritage Constraints”</p>	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>• World Heritage Site: Royal Botanic Gardens, Kew <a href="#">and associated assets</a></li> </ul>

	<p>Suggested amendment to policy text:</p> <p>Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.</p>
<p>Site Allocation 27 Kew Bridge Distribution Centre “Heritage Constraints”</p>	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>World Heritage Site: Royal Botanic Gardens, Kew <a href="#">and associated assets</a></li> </ul> <p>Suggested amendment to policy text:</p> <p>Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.</p>
<p>Site Allocation 28, 27 GWR “Heritage Constraints”</p>	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>World Heritage Site: Royal Botanic Gardens, Kew <a href="#">and associated assets</a></li> </ul>
<p>Site Allocation 29 EMC Tower “Heritage Constraints”</p>	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>World Heritage Site: Royal Botanic Gardens, Kew <a href="#">and associated assets</a></li> </ul> <p>Suggested amendment to policy text:</p> <p>Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.</p>
<p>Site Allocation 30 Vantage West “Heritage Constraints”</p>	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>World Heritage Site: Royal Botanic Gardens, Kew <a href="#">and associated assets</a></li> </ul> <p>Suggested amendment to policy text:</p> <p>Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.</p>
<p>Site Allocation 32 Brentford Fountain Leisure Centre “Heritage Constraints”</p>	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>Conservation Areas... <a href="#">Kew Green</a></li> <li><a href="#">Royal Botanic Gardens, Kew World Heritage Site and associated heritage assets</a></li> </ul> <p>Suggested amendment to policy text:</p>

	<p>Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.</p>
<p>Site Allocation 33 Esso Chiswick Roundabout “Heritage Constraints”</p>	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>• <a href="#"><u>Royal Botanic Gardens, Kew World Heritage Site and associated heritage assets</u></a></li> </ul> <p>Suggested amendment to policy text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.</p>
<p>Site Allocation 34 Former Natwest Chiswick “Planning Designations”  “Heritage Constraints”</p>	<p>For consistency with other sites and national policy add: <a href="#"><u>The site is part of an Archaeological Priority Area; a desk based archaeological assessment will be required, the results of which may lead to further investigation being necessary, see Local Plan Policy CC4 or any subsequent policy.</u></a></p> <p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>• World Heritage Site: Royal Botanic Gardens Kew <a href="#"><u>and associated heritage assets</u></a></li> </ul> <p>Suggested amendment to policy text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.</p>
<p>Site Allocation 35 B&amp;Q Chiswick “Planning Designations”  “Heritage Constraints”</p>	<p>For consistency with other sites and national policy add: <a href="#"><u>The site is part of an Archaeological Priority Area; a desk based archaeological assessment will be required, the results of which may lead to further investigation being necessary, see Local Plan Policy CC4 or any subsequent policy.</u></a></p> <p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>• World Heritage Site: Royal Botanic Gardens Kew <a href="#"><u>and associated heritage assets</u></a></li> </ul> <p>Suggested amendment to policy text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.</p>

<p>Site Allocation 37 Gunnersbury Station CP “Heritage Constraints”</p>	<p>Suggested amendment to policy text: Further details on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.</p>
<p>Site Allocation 52 Lidl Feltham “Heritage Constraints”</p>	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>• <a href="#"><u>Grade II listed Tower and Spire of Former Church of St Catherine</u></a></li> </ul>
<p>Site Allocation 69 Land at 2 High St Feltham “Heritage Constraints”</p>	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>• <a href="#"><u>Grade II listed Tower and Spire of Former Church of St Catherine</u></a></li> </ul>
<p>Site Allocation 70 Royal Naval Club “Heritage Constraints”</p>	<p>Suggested amendments to heritage asset list:</p> <ul style="list-style-type: none"> <li>• <a href="#"><u>Hanworth Park Conservation Area</u></a></li> </ul>
<p>Site Allocation 77 Land South of Western International Market “Planning Designations”</p>	<p>For consistency with other sites and national policy add: <a href="#"><u>The site is part of an Archaeological Priority Area; a desk based archaeological assessment will be required, the results of which may lead to further investigation being necessary, see Local Plan Policy CC4 or any subsequent policy.</u></a></p>
<p>Site Allocation 84 Hounslow Cavalry Barracks “Planning Designations”</p>	<p>For consistency with other sites and national policy add: <a href="#"><u>The site is part of an Archaeological Priority Area; a desk based archaeological assessment will be required, the results of which may lead to further investigation being necessary, see Local Plan Policy CC4 or any subsequent policy.</u></a></p>
<p>Site Allocation 85 Builders Yard “Planning Designations”</p>	<p>For consistency with other sites and national policy add: <a href="#"><u>The site is part of an Archaeological Priority Area; a desk based archaeological assessment will be required, the results of which may lead to further investigation being necessary, see Local Plan Policy CC4 or any subsequent policy.</u></a></p>
<p>Site Allocation 96 Europa House “Planning Designations”</p>	<p>Suggested amendment to policy text: Site is <del>adjacent to</del> <a href="#"><u>located in</u></a> Isleworth Riverside conservation area.  Suggested new text: <a href="#"><u>The site is located in the Royal Botanic Gardens, Kew World Heritage Site - Buffer Zone and should be designed to avoid</u></a></p>



<p>“Planning Designations”</p> <p>“Heritage Concerns”</p> <p>“Site requirements”</p>	<p>development should seek to conserve and enhance the buildings and <del>its</del> <u>their</u> settings.</p> <p>Suggested corrections to heritage assets list:</p> <ul style="list-style-type: none"> <li>Grade II Listed Prospect House; Grade II <del>Listen 69-75</del> <u>listed No.s 69 and 71, and 73 and 75</u> Boston Manor Road;</li> </ul> <p>Suggested amendment to policy text as this site is not located in a tall building area:</p> <p><del>Further details on the assessment of appropriate heights are set out in the Tall Buildings Study and the Great West Corridor Masterplan.</del></p>
<p>Site Allocation 114 Royal Mail Hounslow</p> <p>“Planning Designations”</p> <p>“Heritage Constraints”</p>	<p>For consistency with other sites and national policy add:</p> <p><del>Archaeological Priority Area:</del> The site is part of an Archaeological Priority Area; <u>a desk based archaeological assessment will be required, the results of which may lead to further investigation being necessary, see Local Plan Policy CC4 or any subsequent policy.</u> <del>Development should consider the impact on this designated heritage asset.</del></p> <p>Is the below a non-designated heritage asset and if not should it be removed from the list?</p> <ul style="list-style-type: none"> <li>Site includes Locally Listed heritage asset, Royal Mail Delivery Office</li> </ul> <p>Suggested amendment to policy text as this site is not located in a tall building area:</p> <p><del>Further details on the assessment of appropriate heights are set out in the Tall Buildings Study.</del></p>
<p>Site Allocation 116 1 Burlington Lane</p> <p>“Heritage Constraints”</p>	<p>Suggested amendment to policy text as this site is not located in a tall building area:</p> <p><del>Further details on the assessment of appropriate heights are set out in the Tall Buildings Study.</del></p>
<p>Site Allocation 117 Treaty Centre</p> <p>“Heritage Constraints”</p>	<p>Suggested additions to heritage assets list bearing in mind potential for very tall buildings and therefore potential impacts on highly graded heritage assets further afield:</p> <ul style="list-style-type: none"> <li><u>A number of Grade II listed buildings close to the site</u></li> <li><u>World Heritage Site: Royal Botanic Gardens, Kew and associated heritage assets</u></li> <li><u>Registered Parks and Gardens: Syon Park, Grade I and Osterley Park, Grade II*</u></li> </ul>

<p>Site Allocation 118 Former GSK "Heritage Constraints"</p>	<p>Suggested additions to heritage assets list bearing in mind potential for very tall buildings and therefore potential impacts on highly graded heritage assets further afield:</p> <ul style="list-style-type: none"> <li>• <a href="#">Listed buildings: Boston Manor House, Grade I...</a></li> <li>...</li> <li>• <a href="#">World Heritage Site: Royal Botanic Gardens, Kew and associated heritage assets</a></li> <li>• <a href="#">Registered Parks and Gardens: Syon Park, Grade I and associated heritage assets</a></li> <li>• <a href="#">Grade I Listed Boston Manor House</a></li> </ul> <p>Amend text:</p> <p>Further detail on the assessment of appropriate heights are set out in <del>the Tall Buildings Study and</del> the Great West Corridor Masterplan.</p>
<p>Site Allocation 120 Land north of Church Rd "Planning Designations"</p>	<p>For consistency with other sites and national policy add:</p> <p><a href="#">The site is part of an Archaeological Priority Area; a desk based archaeological assessment will be required, the results of which may lead to further investigation being necessary, see Local Plan Policy CC4 or any subsequent policy.</a></p>