

Hounslow Local Plan (2020-2041)
Examination Matters, Issues and Questions
Stage 2 Hearings

Matter 9 – Site Allocations

April 2026



**London Borough
of Hounslow**

Council's Response to Inspectors' Matters, Issues, Questions

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:

Q1) Are the proposed site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts?

1. Yes, the proposed site allocations are appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts.

2. In accordance with NPPF (**ORD3**¹) and NPPG the Site Allocations and Capacity Assessment (SACA) 2024 (**EBSC2**²) systematically assessed each proposed site against planning constraints, infrastructure requirements and adverse impacts at site-by-site level, which informed the suitability, availability and achievability of each site. This assessment included judging the adverse impacts of development against a number of planning constraints including:
 - **Environmental and physical constraints**, such as flood risk (sequential and exception testing), groundwater vulnerability, biodiversity, contamination and air quality and noise exposure especially in proximity to Heathrow.
 - **Designated land and policy constraints**, including Green Belt and Metropolitan Open Land (informed by the Council's Green Belt Review), Sites of Importance for Nature Conservation (SINC),
 - **Transport and accessibility constraints**, using Public Transport Accessibility Levels (PTAL) to ensure development potential aligns with access to sustainable transport.

¹ ORD3 [NPPF 2023](#)

² EBSC2 [Hounslow Site Allocations and Capacity Assessment \(SACA\) \(2024\)](#)

- **Land ownership and deliverability constraints**, including multiple ownership, long leases, or lack of landowner support, all assessed to determine realistic deliverability within the plan period.
 - **Amenity constraints**: preventing development that would unacceptably affect neighbouring residential properties.
 - **Heritage and townscape constraints**, requiring development to protect conservation areas and the setting of listed buildings.
3. For sites where it was found that development would have had an unmitigable adverse impact on planning constraints, they were either excluded and not carried forward for a capacity assessment, or had their site boundary altered, showing that planning constraints and the adverse impacts of potential development on these constraints were central to the assessment process of the SACA 2024.

Infrastructure Considerations

4. Infrastructure requirements were also fully factored into the assessment process of the SACA (2024). This included having regard to PTAL data where considering the density of sites through the capacity assessment stage, consideration of West London electricity capacity constraints and considering the impacts of development on social and community infrastructure. A risk assessment (Stage 4b in the SACA (2024)) then addressed potential delays linked to infrastructure provision through applying mitigation such as extended phasing and conservative delivery assumptions.
5. Transport infrastructure was initially considered at a strategic level through the Integrated Impact Assessment (IIA) (**S3**³). The IIA tested options to inform the most appropriate approach for the Council to take. Three options were appraised, which are set out in pages 44-49 of the IIA, and the assessment concluded that the Plan should proceed with Option 1: *“Delivery of major new rail access improvements to serve the borough alongside wider measures to improve sustainable transport access and active travel opportunities.”*
6. Following the selection of this option, the Council, working in partnership with key transport infrastructure providers, including TfL and Network Rail, identified a range of

³ S3 [Hounslow Local Plan Review Integrated Impact Assessment Report](#)

transport infrastructure improvements to be delivered over the plan period, including major new rail access improvements and wider measures to support sustainable transport and active travel. The identified infrastructure improvements are set out in Table EC1.1 of Policy EC1 (**S1**⁴) and, where relevant, within the Site Requirements and/or Movement and Access sections of the Site Allocations (**S1a**⁵) and the Infrastructure Delivery Plan (IDP) (**EBID1**⁶), which considers infrastructure delivery alongside the phasing in the site allocations.

7. The IIA, IDP and submission version of the Local Plan 2020-2041, were all published for consultation at Regulation 19 with site developers, key consultees and infrastructure providers, such as TfL, Network Rail, Sports England, Thames Water, NHS Trust, National Highways consulted as part of the plan making process. Many of these consultees are important stakeholders in the delivery of infrastructure and their input has been taken into account when determining infrastructure need and delivery over the plan period.

Q2) 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?

Q2) LBH response:

8. As outlined in the answer to Question 1 above, the site constraints (which includes specific site conditions) were taken into account as part of the suitability assessment in the SACA 2024 (**EBSC2**⁷). Any submitted site that had an unmitigable impact or insurmountable planning constraint was either excluded or it was taken into account when establishing the site boundary. For sites that passed the suitability, availability and achievability tests, specific development quanta were established using a ‘density-by-design’ approach.

⁴ S1 [Hounslow Local Plan 2020-2041 Proposed Submission Version](#)

⁵ S1a [Hounslow Local Plan 2020-2041 Proposed Submission Version: Chapter 12 - Site Allocations](#)

⁶ EBED1 [Hounslow Infrastructure Delivery Plan \(May 2025\)](#)

⁷ EBSC2 [Hounslow Site Allocations and Capacity Assessment \(SACA\) \(2024\)](#)

9. The NPPF requires development to optimise density, and the London Plan (2021) (ADP1⁸) establishes that density of development proposals should “*consider and be linked to provision of future planned levels of infrastructure*” (D2(A1)) and “*must make the best use of land by following a design-led approach that optimises the capacity*” (D3(A)). The Council utilised a Site Capacity Assessment Calculator as part of the assessment to derive capacities for the sites considered in the SACA 2024. The template for this, an excerpt of which is shown in Appendix 3 of the SACA 2024, allowed for: development type; footprint; site coverage; and other factors to be taken into account in determining appropriate site capacities. In addition, a Site Capacity 3D Modelling Tool known as the Hounslow Intensification Tool was utilised to quality check results of the capacity assessments, and calculate capacities for new sites applying site modelling and layouts. The modelling element was connected to a density calculator tool that provided capacities based on the size and massing of the modelled development. An example of this tool is shown in Appendix 4 of the SACA 2024.
10. 9These tools helped form the basis for the preparation of a ‘density-by-design’ capacity assessment method and as part of this process, planning constraints and general site conditions, and the risk that they pose to development, were also taken into account. As such, it is not considered that site conditions or constraints will prevent or delay or adversely affect viability and delivery of any of the site allocations.
11. In regards to infrastructure requirements, they have been captured through the IDP, which was updated in May 2025 and aligns with Site Allocations. Infrastructure providers were consulted on the updated IDP, and the submission version of the Local Plan, at Regulation 19 stage, and offered the opportunity to comment on requirements that may be needed through the development of their site. Specifically in regards to transport infrastructure requirements, the Council refers to its response in **WS5.1**¹⁰ where, in answer to Question 3, it is stated that “*the delivery of the strategic requirements identified in the Plan are not contingent upon the above transport improvements being fully delivered within the plan period. Whilst the transport improvements are important to ensure long-term investment in capacity and*

⁸ ADP1 [London Plan 2021](#)

¹⁰ WS5.1 <https://www.hounslow.gov.uk/downloads/file/12963/hearing-statement-matter-5-transport-communications-and-connectivity&download=1>

sustainability, the Plan's proposed growth and development is not contingent upon their full completion. The strategic requirements of the Local Plan along with the planned growth over the plan period, can both be delivered independently, without reliance on the transport improvements being delivered". The Council is confident that the Transport Infrastructure projects identified in the Plan will be delivered in their allocated phasing and timescales and have demonstrated that a number of Transport Infrastructure providers are also committed to this. Details of this can be seen in recently signed Statements of Common Ground with TfL, Network Rail and the West London Alliance (**EX5j**¹¹, **EX5k**¹², **EX5l**¹³).

12. Notwithstanding the above, a number of mitigation measures have been employed by the Council to assist in the event of issues with deliverability. The sites assessed in the SACA 2024 have been subject to review by officers in the Council's Spatial Planning team as well as engagement with landowners as to the expected development that the Council is anticipating to come forward and the timescales for when this is likely to be. The updated Housing Trajectory (**EX44i**¹⁴) also factors in a lapse rate for sites with permission that have not yet started. This is set out in detail in the Council's response to Matter 10 Question 12.

13. The above demonstrates that the Council has adopted a proactively conservative approach to the allocation of sites and infrastructure requirements and, where possible, has sought to engage with developers and infrastructure providers at an early stage. Through this engagement and conservative approach, the Council considers that it is clear what the expectations are in terms of the deliverables for each site, with interested parties provided with the opportunity to raise concerns at various points in the plan making process, including the statutory consultation stages.

Q3) Are the proposed site allocation boundaries justified and effective?

¹¹ EX5j [Statement of Common Ground between LB Hounslow and TfL \(January 2026\)](#)

¹² EX5k [Statement of Common Ground between LB Hounslow, Network Rail, and TfL \(January 2026\)](#)

¹³ EX5l [Statement of Common Ground between LB Hounslow, West London Alliance, Network Rail, and TfL \(January 2026\)](#)

¹⁴ EX44i [Updated Housing Trajectory and Completions](#)

Q3) LBH response:

14. Yes. The proposed site allocation boundaries have been determined having regard to availability information submitted by developers and landowners through Call for Sites exercises. Then, where necessary or appropriate, officers of the Council performed checks against land registry Title Plans for specific sites, to ensure site ownership reflected the information the Council has available. Boundaries were refined further, having regard to the suitability, availability and achievability assessment of sites undertaken as part of the Hounslow Site Allocations and Capacity Assessment (SACA) 2024 (**Document EBSC2**¹⁵) which are set out in Appendix 1 of the document. In particular, the assessment of suitability constraints was used to establish where site boundaries should be amended to exclude any specific areas subject to insurmountable constraints.

15. The Council also refers to proposed mapping modifications **HLP_PM_03** and **HLP_PM_13** in the Schedule of Suggested Modifications to the Policies Map (**Document S11a**¹⁶). These proposed modifications seek to amend the site boundaries of allocations 77 – Land South of Western International Market and 103 – West Middlesex Hospital, in response to duty to cooperate discussions with a neighbouring borough (see LB Hounslow and LB Hillingdon SoCG, **Document EX5f**¹⁷) and a representation submitted at Regulation 19 stage (**Document S9**¹⁸, representation **REP060 Chelsea and Westminster NHS Foundation Trust**).

Q4) 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?

Q4) LBH response:

16. Yes. The Council refers to paragraphs 3.15 to 3.21 of Document EBSC2 which explains the approach taken to the development potential of sites in the SACA, how their

¹⁵ EBSC2 [Hounslow Site Allocations and Capacity Assessment \(SACA\) \(2024\)](#)

¹⁶ S11a [Schedule of Suggested Modifications to the Policies Map](#)

¹⁷ EX5f – [Statement of Common Ground between LB Hounslow and LB Hillingdon \(October 2025\)](#)

¹⁸ S9 [Link to Representations made pursuant to Regulation 20 \(in response to consultation at Regulation 19 Stage\)\(Redacted\)](#)

capacities have been calculated, and what they are based upon. Appendix 3 of EBSC2 shows an example of the Site Capacity Assessment Calculator Template that was used as part of the assessment to derive capacities. Appendix 4 of EBSC2 shows an example of the Site Capacity 3D Modelling Template known as the Hounslow Intensification Tool that was subsequently developed by the Council in partnership with VU.CITY. This was utilised to quality check results of the capacity assessments previously undertaken in the earlier 2020 version of the SACA, and was also used to calculate capacities for sites submitted at later stages in the process, such as during the Regulation 18 consultation in November/December 2023.

17. Detailed site assessments that include the estimated capacities for the sites considered in the SACA are all included in Appendix 1 of EBSC2 and the Hounslow Site Allocations and Capacity Assessment (SACA) Addendum June 2025 (**Document EBSC2b**¹⁹).
18. The Council also refers to paragraphs 3.7 to 3.17 of the Housing Background Explanatory Note (**Document EBSC1**²⁰) which covers the identification of site capacities in further detail.

Q5) 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?

Q5) LBH response:

19. Yes, the timescales for development lead-in times and annual delivery rates for site allocations are realistic and are supported by evidence. Annual delivery rates for allocations are supported by Hounslow Council's completions evidence covering the Plan period from 2019/20-2024/25, the last year for which completions data is available. The Council conducted an analysis of year-on-year completions for sites delivering over 100 dwellings. For sites of less than 100 units, the Council has generally used average

¹⁹ EBSC2b [Hounslow Site Allocations and Capacity Assessment \(SACA\) Addendum \(June 2025\)](#)

²⁰ EBSC1 [Housing Background Explanatory Note \(June 2025\)](#)

delivery rates derived from Lichfield Start to Finish rates²¹, with adjustments to reflect the London context of flatted development where appropriate. Further explanation of this methodology is found in paragraph 2.31 of **Document EX44h**²².

20. This analysis produced an average delivery rate for sites delivering 100-499 units and 500+ units. For sites of 100-499 units the average delivery rate in Hounslow is 154 units per annum, based on average previous delivery across 17 sites. For sites of 500+ units, the average delivery rate in Hounslow is 198 units per annum, based on average previous delivery across 4 sites. To ensure the calculation for average delivery rates is as up to date as possible, the Council have used sites that have commenced or started delivery after the base date of the London Plan 2021 (**ADP1**). Due to the threshold for larger sites being >500, the sample size is smaller. Nevertheless, this provides the most up-to-date information on delivery rates in the borough in recent years. As this evidence is specific to Hounslow and accurately reflects previous housing delivery in the borough from the base date of the London Plan 2021, it is therefore considered to be realistic and justified.
21. Regarding the lead-in times, for sites of 100-499 units, the same completions dataset was used to calculate an average lead in time of 2.8 years since 2019/20, the base date of the London Plan 2021. This lead-in time is justified by the Council's evidence of previous lead-in times and is therefore realistic and supported by local evidence. Due to the small number and specific nature of schemes over 500 units, the Council's Planning Policy officers engaged with Development Management colleagues, who have direct contact with site promoters. As a result of these discussions, the Council has provided bespoke lead-in times for each scheme over 500 units that is expected to start delivery within five years, which have been informed by the most up-to-date information available. Therefore, the lead-in times for large schemes are also considered to be justified and supported by evidence, per paragraph 022 of the PPG 2019²³.
22. Lead-in times have not been calculated for allocations phased outside the five-year housing land supply period. This is because lead-in times are applied from the decision

²¹ [start-to-finish-3_how-quickly-do-large-scale-housing-sites-deliver.pdf](#)

²² EX44h – 5YHLS Position Update March 2026

²³ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

date. For allocations expected to deliver outside the initial five-year period, there is no decision date from which to apply a lead-in time.

23. While, for very large sites, lead-in times have been established based on discussions with site promoters/developers, who are able to provide a point-in-time update on the pre-commencement situation, for establishing delivery rates for non-commenced schemes, the Council uses average completions from 2019/20-2024/25. Over the course of construction, there are many variables which may be difficult to foresee and could affect the expected delivery rates. As a result, site promoters/developers are only able to provide a best estimate of potential future delivery rates. Therefore, the Council has used historical delivery rates from 2019/20-2024/25 which reflect the realities of recent large-site delivery in the borough, while retaining the bespoke conversations with developers for lead-in times, when they are able to provide an insight in the current pre-commencement position.

24. For allocations under 100 units, assessments were made using Lichfields start-to-finish rates as a starting point. This approach was taken due to the number of delivered sites under 100 units, which meant that calculating averages would have been impractical. Additionally, as these schemes are generally less complex it is considered that a more generalised approach is sufficient.

Q6) Does the Plan sufficiently make clear the infrastructure requirements for each of the allocated sites, together with the timing of and dependencies upon such infrastructure for their delivery?

Q6) LBH response:

25. Yes, the infrastructure requirements for each of the allocated sites are sufficiently clear. Where relevant, these are listed in the 'Site Requirements' section of each individual Site Allocation (**S1a²⁴**) and/or the 'Movement and Access' section with a 'Phasing' section to reflect the overall delivery timings for each site. Further details regarding specific infrastructure requirements, including delivery timings, can also be found in the

²⁴S1a [Hounslow Local Plan 2020-2041 Site Allocations](#)

Hounslow Infrastructure Delivery Plan (IDP) (**EBID1**²⁵).

26. The IDP (updated May 2025) aims to capture the range and scope of infrastructure required to support the objectives of the emerging Local Plan 2020-41 and growth projected to be delivered within the Plan period. The IDP was part of the public consultation on the Local Plan during the statutory Regulation 19 process, at which stage statutory consultees, including numerous infrastructure providers, had opportunity to comment. Updates to the IDP have been informed by comments received at Regulation 19 stage, and relevant strategies and infrastructure requirements as they currently exist and/or are being prepared. These are set out in Appendix 2 of the IDP (Source Strategies and Other Documents Referenced in the IDP). This is also true of costing and funding assumptions at the time of writing which can be seen in Appendix 1 of the IDP.

Q7) 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?

Q7) LBH response:

27. Yes. Sites that were assessed as suitable, available and achievable in the SACA 2024 (Document **EBSC2**) that were over 0.25 hectares and/or determined to have a capacity of at least 25 homes were identified as site allocations in the Plan. Residential mixed use sites that were determined to have a capacity of less than 25 homes or were less than 0.25 hectares but also accommodated non-residential uses were also identified as site allocations.
28. Soley residential sites that were smaller than 0.25 hectares and/or were assessed to have a capacity of less than 25 homes were not allocated and instead added to the Brownfield Land Register except in very limited cases where such sites were identified as part of a comprehensive master planning exercise and inherently linked to neighbouring allocations. The Brownfield Land Register small sites are recognised for the important contribution they make to the Plan's housing supply, but are not considered to be sufficiently large or strategic to be allocated. The Council considers

²⁵ EBID1 [Hounslow Infrastructure Delivery Plan \(May 2025\)](#)

that the identification and assessment of small sites as part of the SACA process demonstrates the efforts the Council has undertaken in order to identify as many small site opportunities as possible.

29. The SACA process also identified sites which were suitable, available and achievable for employment development, including redevelopment and intensification opportunities. All of these identified sites which met the three tests described above were taken forward as allocations. With only a limited supply of such sites being identified in the west of the borough, and no alternative options for meeting the substantial need identified for additional industrial land in this area, the allocations also include a selective number of sites in the Green Belt where the Council considers that exceptional circumstances are demonstrated for their release. The detailed exceptional circumstances case for their release is set out in the Green Belt Background Paper (Incorporating Exceptional Circumstances Assessment) June 2025 (**Document EBGB1**²⁶).

30. Overall, the Council considers the proposed site allocations including their development requirements, along with corresponding suggested modifications set out on pages 244-258 of the Post Stage 1 Hearings Version of the Schedule of Suggested Modifications (**Document EX57**²⁷) meet the tests outlined in paragraph 36 of the NPPF and are therefore sound.

31. In the Greater London Authority's Regulation 19 representation (**REP074**²⁸), the Mayor of London provided comments about some of the proposed site allocations in the Plan. Subsequently, a number of proposed modifications were agreed between the two parties in the Statement of Common Ground between LB Hounslow and the Mayor of London (**Document EX5e**)²⁹ to address the Mayor's comments. These proposed modifications have now also been included in Document EX57. Furthermore, paragraph 4.12.5 of Document EX5e confirmed that there were no outstanding issues in relation to

²⁶ EBGB1 [Green Belt Background Paper \(Incorporating Exceptional Circumstances Assessment\) \(June 2025\)](#)

²⁷ EX57 – [Post Stage 1 Hearings Version of the Schedule of Suggested Modifications \(S11\)](#)

²⁸ REP074 in Document S9 [Link to Representations made pursuant to Regulation 20 \(in response to consultation at Regulation 19 Stage\)\(Redacted\)](#)

²⁹ EX5e – [Statement of Common Ground between LB Hounslow and the Mayor of London \(October 2025\)](#)

site allocations between the two parties. The Council therefore considers that the proposed allocations are also in general conformity with the London Plan.

Q8) 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?

Q8) LBH response:

32. The Council has suggested a number of proposed modifications to some of the site allocations in Chapter 12 of the Plan on pages 244-258 of the Post Stage 1 Hearings Version of the Schedule of Suggested Modifications (**Document EX57**³⁰). These include proposed modifications that have been agreed with a number of statutory consultees, including:

- The Mayor of London as set out in response to Question 8 of Matter 9 in this written statement;
- Historic England, whereby some proposed modifications in response to points raised in Historic England’s Regulation 19 representation (**REP062**³¹) have been agreed and are also set out in the [Statement of Common Ground between LB Hounslow and Historic England, December 2025](#), (**Document EX5h**³²);
- Transport for London, whereby some proposed modifications in response to points raised in Transport for London’s Regulation 19 representation (**REP077**³³) have been agreed and are also set out in the [Statement of Common Ground between LB Hounslow and TfL, August 2025](#) (**Document EX5a**³⁴).

33. The Council does not consider that any further modifications to Chapter 12 of the Plan beyond those referred to above and already included in Document EX57 are necessary.

³⁰ EX57 – [Post Stage 1 Hearings Version of the Schedule of Suggested Modifications \(S11\)](#)

³¹ [REP062](#) in Document S9 [Link to Representations made pursuant to Regulation 20 \(in response to consultation at Regulation 19 Stage\)\(Redacted\)](#)

³² EX5h – [Statement of Common Ground between LB Hounslow and Historic England \(December 2025\)](#)

³³ [REP077](#) in Document S9 [Link to Representations made pursuant to Regulation 20 \(in response to consultation at Regulation 19 Stage\)\(Redacted\)](#)

³⁴ EX5a – [Statement of Common Ground between LB Hounslow and TfL \(August 2025\)](#)

Q9) Policy P2(c) relates specifically to Land at Hatton Fields. Without prejudice to our consideration and previous discussions that took place as part of Matter 4, are the requirements of development proposals in that policy, justified, effective, consistent with national policy and in general conformity with the London Plan 2021?

34. Policy P2(c) is a place policy focused on Land at Hatton Fields, which should be read in conjunction with site allocation 57. It sets out an overall vision for this strategic site and outlines key development requirements. The site allocation includes a more detailed outline of the development requirements.

35. The objective of the policy and of this site is to deliver a major portion of the employment provision allocated in the west of the borough. The policy states that 63,450 sqm of floorspace should be provided, a quantum which is reflected in site allocation 57.

36. The development requirements outlined in Policy P2(c) seek to ensure the major logistics development at the site will be of high quality, including in terms of its design, layout and contribution to the green infrastructure of the area. They seek to ensure features such as sustainable transport and supporting healthy communities are embedded into the design of development in this area.

37. This approach is consistent with the 2023 National Planning Policy Framework, including Chapters 6 (including paragraphs 86 and 87), 8 (including paragraphs 102 and 103), 9 (including paragraphs 108 and 110), 11 (including paragraphs 124 and 128), 12 and 14. It is also in general conformity with the 2021 London Plan, in particular policies GG2, GG3, GG5, D3, G1, G4, G6, T1, T2 and T7. The Council considers that the policy and its requirements are essential for the plan strategy and to ensure compliance with national policy and with the Good Growth approach in the London Plan. Requirements are also included where necessary to reflect other government regulations or legislation (e.g. the Environment Act 2021 regarding Biodiversity Net Gain and DfT Circular 01/2010 (and any subsequent update) regarding control of development in airport public safety zones.

38. The requirements for development proposals seek to protect existing features and facilities on the site including an expanded Hatton Cemetery and Hounslow Urban Farm, and protecting Hatton Meadows SINC and the horse paddock on the land. The policy also refers to supporting and encouraging active lifestyles by improving access and connections to the adjoining Hatton Road Allotments. The requirements include the delivery of a new community nature zone to the south of the proposed industrial development. This is considered to be a key benefit for the development to provide improved access for the local community to green space and protection of the designated SINC on the site.

39. Following the Stage 1 hearings, the Council is proposing modifications to all of the place policies, one of the objectives of which is to clarify which elements of the policy are strategic objectives for the Council and which are requirements of development proposals. This has been done in the case of this policy, with the proposed approach set out in the document *Note on Area-Based Approach* (Document **EX46**) and the suggested modifications also set out in the Post Stage 1 Hearings Version of the Schedule of Suggested Modifications (Proposed modification EIP_C2_66 in Document **EX57**³⁵).

N.B. For sites where specific representations have been made, the Council is also requested to respond to the particular issues raised where not otherwise covered by the above questions.

40. Please refer to Appendix 1 – Regulation 19 Representations relating to Site Allocations and Council Responses.

10) Is Policy IMP2 insofar as it seeks to support delivery of the site allocations - positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan 2021?

Q10) LBH response:

³⁵ EX57 – [Post Stage 1 Hearings Version of the Schedule of Suggested Modifications \(S11\)](#)

41. Yes. Policy IMP2, insofar as it seeks to support the delivery of site allocations, is positively prepared, justified, effective, consistent with national policy, and in general conformity with the London Plan 2021 (**ALP1**).
42. The policy is positively prepared as it provides clear support for the delivery of site allocation to meet the borough's identified needs.
43. This is shown most clearly in clause A, which provides support for proposals that accord with the identified site allocation, this further shown in clause B which aims to achieve the Council approach to the policy by "preparing non-statutory planning briefs, and masterplans where appropriate to support the development of individual site allocations and the spatial integration of related development sites". The policy is positively prepared because the council has anticipated the complexity of delivering site allocations and has mechanisms to provide additional design guidance and to coordinate development.
44. Furthermore, clause C stipulates that the Council will achieve the IMP2 policy approach by "considering the use of Compulsory Purchase Orders for land assembly and rights over land to support wider regeneration objectives and the delivery of critical or necessary infrastructure", allowing the Council to actively intervene where necessary to ensure delivery of development and infrastructure required to meet objectively assessed needs. This is consistent with NPPF paragraph 125.
45. The policy is justified by the evidence base underpinning the site allocations, including capacity and viability testing.
46. Clause F requires proposals to "demonstrate that they have sought to meet or, where appropriate, exceed the minimum development quanta specified for uses in the allocations". This would ensure that development comes forward at a scale which is consistent with the assumptions in the Council's evidence base, specifically the Hounslow Site Allocations and Capacity Assessment (SACA) (2024) (**Document EBSC2**) consistent with paragraph 69 of the NPPF. The ability for developers to exceed these minimum development quanta 'where appropriate' provides a degree of flexibility, this enhancing the effectiveness of the policy.

47. This approach is in general conformity with London Plan (**ALP1**) Policy D3 clause A which seeks to optimise site capacities.
48. The policy is effective as it is deliverable over the plan period and is supported by clear mechanisms to secure coordinated delivery.
49. Clause G supports effective delivery of site allocations by expecting development proposals to ensure that “partial development of the site allocation...would not be detrimental to the development” and the delivery of the wider site. This secures a comprehensive approach to development and seeks to avoid schemes coming forward that could constrain infrastructure provision, reduce the overall development capacity, or sterilise parts of the allocation. This supports the effective use of land and regeneration of the wider area, reducing the risk that sites are only partially delivered (consistent with NPPF paragraphs 123 and 124).
50. Furthermore, through clause H the policy also ensures that development of allocated sites is “planned and phased in a complementary manner to fit in with the programmed delivery of other development and infrastructure”. This shows that the Council has considered not only where growth should occur, but how it will be delivered in practice over the plan period. By aligning development with the timing of infrastructure provision, the policy promotes coordinated and sustainable delivery and reduces the risk of delay or non-delivery, thereby ensuring that site allocations contribute effectively to meeting the borough’s objectively assessed housing, employment and infrastructure needs.
51. Policy IMP2 is consistent with national policy. NPPF Paragraph 20(a) requires strategic policies to make sufficient provision for housing, including affordable housing, employment and other forms of development. Policy IMP2 supports this requirement by ensuring that the development capacity identified through the site allocations and supporting evidence base is delivered in practice. In particular, in IMP2 clause F requires development proposals to demonstrate that they have sought to meet or exceed the minimum development quanta specified for each allocation. The link to viability assessment and review mechanisms ensures that affordable housing delivery is addressed and is consistent with national policy. This is also consistent with NPPF paragraphs 123.

52. IMP2 is also in general conformity with the London Plan as seen in objectives GG2 Making the best use of land which seeks to ensure that land is used efficiently and that growth is brought forward in a sustainable way. Clause F of IMP2 supports this by requiring development to deliver the quantum identified in the site allocation, which reflects GG2(C) and GG2(D) in seeking to optimise the capacity of sites. Clause G of the IMP2 further supports this approach by ensuring that partial development does not prejudice the wider allocation, thereby helping to avoid the under-development or sterilisation of land, thus optimising the use of land.
53. Policy IMP2 is also in general conformity with London Plan objective GG4, Delivering the homes Londoners need as both policies aim to provides the delivery mechanism through which the homes identified in site allocations are brought forward in practice, in a comprehensive, coordinated and timely way.
54. Policy IMP2 is also in general conformity with London Plan policy DF1 ‘Delivery of the Plan and Planning Obligations’, particularly clause F which expects development proposals following the viability tested route to the delivery of affordable housing to “... provide financial viability assessments following the review mechanisms set out in Policy SC2”. This is consistent with clauses A, B, and C of policy DF1 of the London Plan.

Appendix 1: Regulation 19 Representations relating to Site Allocations and Council Responses

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
1	Sky Campus Brentford	Environment Agency	The Sky Campus is near the Transport Avenue historic landfill to the North. The historic landfill database indicates Transport Avenue accepted commercial and household waste from 1900 to 1938. Please refer to our comments on development on or near historic landfills on pages 19-22 (within REP106 of Document S9 - Link to Representations made pursuant to Regulation 20 (in response to consultation at Regulation 19 Stage)).	Comments noted. It is considered that the detailed advice provided in relation to landfill will be more applicable to inform detailed scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose to take any further action at this time.
2	Tesco Osterley	St Edward Homes Limited	<p>The redevelopment of the Tesco Osterley and Homebase sites present a significant opportunity to transform large brownfield sites into vibrant new places which will benefit their surrounding community for years to come. The plans will contribute 29% of the homes to be delivered across the Great West Corridor Opportunity Area, including the much-needed provision of up to 750 affordable homes, as well as investment into local infrastructure, new transport connectivity and green space.</p> <p>St Edward is now fully committed to bringing forward the delivery of these sites and the extensive package of benefits the regeneration of these brownfield sites will provide. We are mindful that the development industry has experienced a number of macroeconomic pressures, including uncontrolled inflation and regulation changes through the Building Safety Act that have contributed to an increasingly challenging delivery environment. Meanwhile the pressures to deliver</p>	<p>The Council considers the work on the sites in the Great West Corridor Masterplan (Document EBCC4³⁶) remains a robust and thorough piece of evidence supporting the Local Plan. The capacities derived through the capacity study section of the Masterplan have informed the site allocation capacities and form the basis of what the Council consider the suitable minimum development quanta for the sites in the Great West Corridor to be, including Tesco Osterley (Site ref 2).</p> <p>This does not prevent developers making a case for a different type of development at planning application stage, where they consider harm may be outweighed by material benefits, but this does not mean</p>

³⁶ [EBCC4 - GWC Masterplan Revision \(2020\)](#)

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>housing and jobs for London continue to grow. It is therefore essential that emerging planning policy establishes the optimum conditions in which to maximise the benefits that can be gained from these sites.</p> <p>The draft policies in the Local Plan 2020-2041, and particularly the site allocations 2 and 11, need to be updated to take account of the planning permissions that have been granted for these sites.</p> <p>The wording of these site allocations was first drafted before the planning applications were submitted. Now that these planning permissions have been granted, and fully supported by LB Hounslow throughout the process, there is updated evidence on what is considered appropriate on these sites. These planning permissions constitute more up-to-date and detailed site-specific evidence than the relatively high-level assessment within other evidence base documents such as the Great West Corridor Masterplan. The Local Plan 2020-2041 needs to be brought up-to-date and should reflect the planning permissions.</p>	<p>the original site allocations should be amended, as these are based on consideration of all planning constraints and site specific circumstances taken account of in the GWC Masterplan and the Site Allocations Capacity Assessment 2024 (Document EBSC2³⁷).</p>
3	Gillette Factory	GLA	<p>The site is currently entirely designated as SIL. Fig ED1 of the draft Plan poorly illustrates that some of the area will lose its industrial designation. Clarity on this would be helpful and could be provided in the allocation images to identify clearly the area to be de-designated.</p>	<p>LB Hounslow agree to present a suggested modification to the key proposal section of site allocation ref 3. Please see suggested modification reference HLP_SA3_01 in Document EX57³⁸</p> <p>The site is a mixed use allocation which as a result removes the Strategic Industrial</p>

³⁷ [EBSC2 – Site Allocations and Capacity Assessment \(2024\)](#)

³⁸ Ex57 - [Post Stage 1 Hearings Version of the Schedule of Suggested Modifications \(S11\)](#).

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>Location (SIL) designation from part of the site which therefore becomes non-designated, as shown on the Hounslow Local Plan 2020-2041 Policies Map. To help provide greater clarity for the boundaries of SIL on the Policies Map, mapping modification HLP_PM_06 is proposed in Document S11a Schedule of Suggested Modifications to the Policies Map.</p> <p>In addition, following the production of a Statement of Common Ground with the Mayor of London (Document EX5e – Statement of Common Ground between LB Hounslow and the Mayor of London (October 2025)), additional suggested modification HLP_C4_04 is proposed in Document EX57 – Post Stage 1 Hearings Version of the Schedule of Suggested Modifications (S11), to help ensure new employment designations are clearly identified.</p>
		<p>The Vinyl Factory Ltd and Gillette Corner Holdings</p>	<p>1) Representation objects to co-location of residential with industrial use at the Gillette Building. Representor highlights that the site is used for film production, a use which would be incompatible with residential use. Representation also highlights that Policy ED2 (Part E) references site allocation 5 for co-location and removal from SIL, but does not mention the Gillette Building.</p>	<p>1) Response noted. The site has been assessed as being suitable for co-location of employment with housing, in order to assist meeting the homes and jobs targets of the GWC Opportunity Area. The GWC Masterplan and capacity study (EBCC4 LBH Great West Corridor)</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>2) Representation discusses site allocation 3 and development details.</p>	<p>Masterplan - Revision (2020) has outlined an approach for mixed-use development at the site. The requirements in the allocation include a buffer being provided between industrial and residential uses to help ensure mitigation of any conflict between the two use types.</p> <p>2) Response noted. No changes proposed. The site has been assessed as being suitable for co-location of employment with housing, in order to assist meeting the indicative targets for homes and jobs figures in the GWC Opportunity Area as well as the overall housing target for the borough and the employment land needs identified in Document EBED1³⁹- and referred to in Policy ED1 of the Plan. The GWC Masterplan has also outlined an approach for mixed use at the site. The requirements in the allocation include a buffer being provided between industrial and residential uses. Reference to maximum parking standards is considered appropriate and in accordance</p>

³⁹ EBED1 - [Hounslow Employment Land Review update \(2024\)](#)

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				with TfL guidelines, and would apply to any specific uses delivered on site as per the uses specified in the allocation's minimum development quanta.
4	125 Harlequin Avenue	No representation received at Regulation 19	No representation received at Regulation 19	No representation received at Regulation 19
5	West Cross Campus	GLA	<p>There is an existing waste site within this allocation. The intention should be to protect and maintain the waste capacity of the facility until at least the current review of the West London Waste Plan (WLWP) is completed. If the waste use is to be released before that time, compensatory capacity will need to be provided in accordance with London Plan 2021 Policy SI9C.</p> <p>The allocation is currently designated SIL and it should be made explicitly clear how the designation is proposed to change. As written it is not clear if the site will become LSIS or a non-designated industrial site.</p>	<p>LBH is aware of the safeguarded waste use operating out of Unit 8 Amalgamated Drive, West Cross Ind Park, within the site boundary. The site is referred to as 'Rentokil Initial Services Ltd' in the safeguarded sites list at Appendix 2 of the WLWP 2015 with 'Clinical Waste Transfer' given as the site activity. The site is now known as 'Initial Washrooms (Brentford) Service Centre' in the EA's Waste Data Interrogator (WDI).</p> <p>WDI data collected for the review of the WLWP indicates that the site managed c5,500tpa HIC waste at peak in the 5 years since 2019.. The site also handled a small amount of hazardous waste (725tpa)..</p> <p>Given evidence suggesting there is a sufficient surplus of waste capacity in West London for both HIC and hazardous waste streams, it is LBH's intention to</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>release the safeguarding of this site through the new WLWP. This would be as part of a plan-led approach in line with London Plan policy SI9, paragraph 9.9.2 . However, LBH confirm that should development come forward before the new WLWP is adopted, LBH would seek to apply WLWP 2015 Policy WLWP 2 'Safeguarding and Protection of Existing and Allocated Waste Sites' to ensure compensatory and equal provision of capacity for waste is made elsewhere in the WLWP area as part of any future development of the site.</p> <p>LBH also agrees to present a suggested modification to the key proposal section of site allocation ref 5. Please see suggested modification reference HLP_SA5_01 In Document EX57.</p> <p>The site is a mixed use allocation which as a result removes the Strategic Industrial Location (SIL) designation from part of the site which therefore becomes non-designated, as shown on the Hounslow Local Plan 2020-2041 Policies Map. To help provide greater clarity for the boundaries of SIL on the Policies Map, mapping modification HLP_PM_06 is proposed in Document S11a Schedule of Suggested Modifications to the Policies Map.</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
		Environment Agency	West Cross Campus is near the Transport Avenue historic landfill EAHL11057 to the North. The historic landfill database indicates Transport Avenue accepted commercial and household waste from 1900 to 1938. Please refer to our comments on development on or near historic landfills on pages 19-22 (within REP106 of Document S9 - Link to Representations made pursuant to Regulation 20 (in response to consultation at Regulation 19 Stage)(Redacted)).	Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.
		Day Group	<ol style="list-style-type: none"> 1) The Day Group suggests edits to wording at Site Allocation 5 relating to the interaction between West Cross Campus and the Transport Avenue Railhead. 2) Site allocation 5: the agent of change principle relating to the existing operations at Safeguarded Minerals Railhead and Associated Minerals Operations should be referenced in the allocation for West Cross Campus. 	<ol style="list-style-type: none"> 1) Comments noted. No changes proposed to wording of allocation ref 5. The requirement that proposals with housing co-located with or adjacent to employment uses/sites should be designed in line with the agent of change principle is considered to be adequately addressed in emerging policies within the plan (policies P1, P1a, ED1, ED2, CC2, EQ5, EQ6 & EQ10), the planning designations section of the allocation, and the London Plan 2021 (which is part of the development plan for Hounslow). 2) Comments noted. See above response.
		Canal & River Trust	Due to the removal of the movement/access map, the need to consider the towpath as part of walking/cycling improvements is not clear.	Comments noted. We note that C&RT have stated that they are not aware of any in principle concerns with proposed site allocations at this stage. The Council would note that, in terms

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>of potential impacts of future development upon the canal network, Policies GB5, GB6 and EQ3 provide a suitable framework to ensure any impacts would be mitigated and that improvements to the network would be promoted. Whereas it is not considered that the comments received on this Allocation question the Plan's soundness or legality, the Council acknowledges that C&RT are the statutory body of the canal network and as such would be consulted at application stage of any proposal that impacted the canal network. Through this consultation and following design principles that are supported elsewhere in the Plan, given that no soundness issues have been raised in this representation, the Council considers that any further detailed matters could be addressed at application stage.</p>
6	BSS Brentford	GLA	The site is currently designated SIL and this should be made clearer in the allocation. As written, it is not clear if the site will become LSIS or a non-designated industrial site.	<p>LBH agrees to present the following modification to the planning designation section:</p> <p>Strategic Industrial Location (SIL): Part of the site is designated SIL. Proposals within SIL should, where feasible, intensify uses suitable for broad industrial type activities</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>and make consideration of impact of development on existing occupiers in accordance with the agent of change principle. Colocation of residential development with industrial development is supported in the allocation outside the boundary of the SIL. Site is also adjacent to SIL and access route; consideration of impact of development on existing occupiers in accordance with the agent of change principle and regard had to the impact of traffic movements servicing these</p> <p>And the following to the key proposal section: The BSS Brentford Site will be redeveloped and intensified to support a broader range of uses. The site is a mixed use allocation which as a result removes the Strategic Industrial Location (SIL) designation from part of the site which therefore becomes non-designated, as shown on the Hounslow Local Plan 2020-2041 Policies Map.</p>
		Environment Agency	<p>This site is on the Transport Avenue historic landfill to the North. The historic landfill database indicates Transport Avenue accepted commercial and household waste from 1900 to 1938. Please refer to our comments on development on or near historic landfills on pages 19-22 (within REP106 of Document S9 - Link to Representations made pursuant to Regulation 20 (in</p>	<p>Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p data-bbox="943 212 1603 276">response to consultation at Regulation 19 Stage)(Redacted)).</p> <p data-bbox="943 284 1603 1209"> 1) Site 6: The sites existing use should not be ‘industrial uses E(g) with ancillary car parking’ but ‘Storage and distribution B8 (with ancillary yard space and car parking); and Parking (sui generis)’. Clarity is requested on what is expected in terms of the relationship between the site and the proposed Golden Mile station including ‘provision of clean-air walking and cycling route across the site’. How would this route connect to land outside the gift of the Day Group. Due to the uses of the site, the boundaries and the configuration a fixed clean air route that follows the Green Grid Strategic Links and Corridors layout may not be practical or deliverable. An annotation should be added confirming the flexibility of this route, which could be included either in Policy P1(a) or in Site Allocation 6. The allocation should include reference to the safeguarded minerals railhead and the attendant agent of change requirements. This is supported by the NPPF and London Plan and is required in the consideration of soundness. 2) The Day Group present suggested changes to Site Allocation 6 </p>	<p data-bbox="1626 212 2132 276">interim, we do not propose any modifications to the Plan in relation to this.</p> <p data-bbox="1626 284 2132 1394"> 1) Comments noted. Support welcomed where provided. No changes proposed. Industrial uses is a broad term and is considered to sufficiently cover the existing uses present on the site. Parking is also referred to in the existing uses section of the allocation. The requirement for intensification of existing uses to take account of conflict with the function of the adjacent strategic industrial location and form a buffer between this and non-employment uses on the site, is considered sufficiently robust to protect and future proof different uses at the site without specific reference to the safeguarded minerals railhead. The placement of the clean air/walking route referred to in the movement and access section of the allocation is not specified and therefore it is not considered that a modification is necessary to confirm that flexibility of the routing is allowed. It is considered that the agent of change principle is suitably embedded in emerging policies </p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>within the Plan and the London Plan 2021 (which is part of the development plan for Hounslow).</p> <p>2) Comments noted. No changes proposed.</p>
		Canal & River Trust	<p>The improvement of access points to the Orbit Bridge should be added into this allocation as part of the facilitation of direct walking and cycling routes.</p>	<p>Comments noted. We note that C&RT have stated that they are not aware of any in principle concerns with proposed site allocations at this stage. The Council would note that, in terms of potential impacts of future development upon the canal network, Policies GB5, GB6 and EQ3 provide a suitable framework to ensure any impacts would be mitigated and that improvements to the network would be promoted. Whereas it is not considered that the comments received on this Allocation question the Plan's soundness or legality, the Council acknowledges that C&RT are the statutory body of the canal network and as such would be consulted at application stage of any proposal that impacted the canal network. Through this consultation and following design principles that are supported elsewhere in the Plan, given that no soundness issues have been raised in this representation, the Council considers that any further detailed</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				matters could be addressed at application stage.
7	Profile West Brentford Car Park	GLA	The site is currently designated SIL and this should be made clearer in the allocation. As written, it is not clear if the site will become LSIS or a non-designated industrial site.	LBH agrees to present a suggested modification to the key proposal section of site allocation ref 7. Please see suggested modification reference HLP_SA7_01 In Document EX57 .
		Day Group Ltd	<ol style="list-style-type: none"> 1) Site allocation 7: the agent of change principle relating to the existing operations at Safeguarded Minerals Railhead and Associated Minerals Operations should be referenced in the allocation 7. 2) The Day Group suggests edits to wording at Site Allocation 7 relating to the interaction between West Cross Campus and the Transport Avenue Railhead. 	<ol style="list-style-type: none"> 1) Comments noted, no changes proposed. The requirement for intensification of existing uses to take account of conflict on the function of the adjacent strategic industrial location and form a buffer between this and non-employment uses on the site, is considered sufficiently robust to protect and future proof different uses at the site without specific reference to the safeguarded minerals railhead. The safeguarding of the railhead is clear as it is shown on the Policies Map. It is considered that the agent of change principle is suitably embedded in emerging policies within the Plan and the London Plan 2021 (which is part of the development plan for Hounslow). 2) Comments noted. No changes proposed to wording of allocation

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>ref 7. The requirement to take account of conflict with the function of the adjacent strategic industrial location is considered to adequately address the need to future proof different uses at neighbouring sites.</p>
		Environment Agency	<p><u>Historic landfill</u> The Profile West Brentford Park site is on the Transport Avenue historic landfill to the North. The historic landfill database indicates Transport Avenue accepted commercial and household waste from 1900 to 1938. Please refer to our comments on development on or near historic landfills on pages 19-22 (within REP106 of Document S9 - Link to Representations made pursuant to Regulation 20 (in response to consultation at Regulation 19 Stage)).</p> <p><u>Flood risk and Proximity to Watercourse</u> The proposed development borders the river Brent and is in Flood Zones 3, 2 and is at risk of flooding in the event of a breach in the tidal flood defences. Flood defences take the form of natural high ground. We therefore recommend the following advice: -</p> <ul style="list-style-type: none"> - Best efforts should be made to place all development areas of site in Flood Zone 1, - Ensure where possible an 8m buffer is left between watercourse and development, any works inside of 8m will require a Flood Risk Activity Permit (FRAP). 	<p>Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.</p> <p>Comments noted. The Council has produced a Sequential and Exceptions Test report 2024 (Document EBEQ1⁴⁰) and has been assessed within the LB Hounslow Strategic Flood Risk Assessment Level 2 (2024) (Document EBEQ2⁴¹) in line with EA recommendations. Please see Environment Agency & LB Hounslow Statement of Common Ground (2025) (Document S10a⁴²).</p>

⁴⁰ [EBEQ1 - Sequential and Exceptions Test report 2024](#)

⁴¹ [EBEQ2 - LB Hounslow Strategic Flood Risk Assessment Level 2 \(2024\)](#)

⁴² [S10a – Statement of Common Ground between EA and LBH](#)

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<ul style="list-style-type: none"> - Buffer zones should be enhanced to improve the riparian zone where possible. - Development inside the 1 in 100 + Climate Change (CC) extent will require Floodplain Compensation. - Sleeping accommodation must not be located below the 2100 modelled breach level (tidal). - Finished Floor Levels should be raised to at minimum 300mm above the 1 in 100 + CC Scenario. 	
		Canal & River Trust	<p>Comments made in 2019 remain relevant. Improvements to the accessibility of the bridge itself should be included in the allocation as part of any proposal to improve the link to Boston Manor Park.</p>	<p>Comments noted. We note that C&RT have stated that they are not aware of any in principle concerns with proposed site allocations at this stage. The Council would note that, in terms of potential impacts of future development upon the canal network, Policies GB5, GB6 and EQ3 provide a suitable framework to ensure any impacts would be mitigated and that improvements to the network would be promoted. Whereas it is not considered that the comments received on this Allocation question the Plan's soundness or legality, the Council acknowledges that C&RT are the statutory body of the canal network and as such would be consulted at application stage of any proposal that impacted the canal network. Through this consultation and following design principles that are supported elsewhere in the Plan, given that no</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>soundness issues have been raised in this representation, the Council considers that any further detailed matters could be addressed at application stage.</p>
8	971 Great West Road	GLA	<p>The proposed allocation would result in an extension to the SIL which lies to the west of the site and this is made clear in the allocation and is noted. It would be beneficial if the site allocation was clear about the gain in SIL floorspace that would result from the proposals including through industrial intensification. In addition, the allocation should only promote Class B uses within the SIL for the reasons set out earlier.</p>	<p>The Council has prepared an Employment Note (including updated monitoring data February 2026, Document EX45⁴³) which includes figures for industrial capacity on sites allocated for employment uses in the Plan, including the net change in floorspace anticipated based on site MDQs (see Appendix 3 of EX45).</p> <p>With regard to promotion of only B use classes in SIL, the Council considers it appropriate to allocate the site for E(g)(iii) use in addition to B2 and B8 uses. However, it proposes a suggested modification to Policy ED1 as outlined in the Statement of Common Ground with the GLA (Document EX5e⁴⁴. p26) and suggested modification reference EIP_C4_10a in Document EX57. The suggested modification states that the Council will use conditions to ensure that uses within Class E are for the appropriate sub-element of this use class with respect to the particular site, and that any</p>

⁴³ [EX45 – Employment Note \(including updated monitoring data \(Feb 2026\)\)](#)

⁴⁴ [EX5e - Statement of Common Ground between the GLA and LBH](#)

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				permitted development rights to move to other uses are removed.
9	Syon Lane Industrial Estate	GLA	The proposed allocation would result in an extension to the SIL which lies to the west of the site and this is made clear in the allocation and is noted. It would be beneficial if the site allocation was clear about the gain in SIL floorspace that would result from the proposals including through industrial intensification. In addition, the allocation should only promote Class B uses within the SIL for the reasons set out earlier.	<p>The Council has prepared an Employment Note (including updated monitoring data February 2026, Document EX45) which includes figures for industrial capacity on sites allocated for employment uses in the Plan, including the net change in floorspace anticipated based on site MDQs (see Appendix 3 of EX45).</p> <p>With regard to promotion of only B use classes in SIL, the Council proposes a suggested modification to Policy ED1 as outlined in the Statement of Common Ground with the GLA (Document EX5e. p26) and suggested modification reference EIP_C4_10a in Document EX57. The suggested modification states that the Council will use conditions to ensure that uses within Class E are for the appropriate sub-element of this use class with respect to the particular site, and that any permitted development rights to move to other uses are removed.</p>
10	931 Great West Road	GLA	The proposed allocation would result in an extension to the SIL which lies to the west of the site and this is made clear in the allocation and is noted. It would be beneficial if the site allocation was clear about the gain in SIL floorspace that would result from the proposals	The Council has prepared an Employment Note (including updated monitoring data February 2026, Document EX45) which includes figures for industrial capacity on sites allocated for employment uses in the

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			including through industrial intensification. In addition, the allocation should only promote Class B uses within the SIL for the reasons set out earlier.	<p>Plan, including the net change in floorspace anticipated based on site MDQs (see Appendix 3).</p> <p>With regard to promotion of only B use classes in SIL, the Council proposes a suggested modification to Policy ED1 as outlined in the Statement of Common Ground with the GLA (Document EX5e. p26) and suggested modification reference EIP_C4_10a in Document EX57. The suggested modification states that the Council will use conditions to ensure that uses within Class E are for the appropriate sub-element of this use class with respect to the particular site, and that any permitted development rights to move to other uses are removed.</p>
11	Homebase Syon Lane	St Edward Homes Limited	<p>The redevelopment of the Tesco Osterley and Homebase sites present a significant opportunity to transform large brownfield sites into vibrant new places which will benefit their surrounding community for years to come. The plans will contribute 29% of the homes to be delivered across the Great West Corridor Opportunity Area, including the much-needed provision of up to 750 affordable homes, as well as investment into local infrastructure, new transport connectivity and green space.</p> <p>St Edward is now fully committed to bringing forward the delivery of these sites and the extensive package of benefits the regeneration of these brownfield sites will provide. We are mindful that the development industry has experienced a number of macroeconomic</p>	<p>The Council considers the work on the sites in the Great West Corridor Masterplan (Document EBCC4) remains a robust and thorough piece of evidence supporting the Local Plan. The capacities derived through the capacity study section of the Masterplan have informed the site allocation capacities and form the basis of what the Council consider the suitable minimum development quanta for the sites in the Great West Corridor to be, including Homebase (site ref 11).</p> <p>This does not prevent developers making a case for a different type of development at</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>pressures, including uncontrolled inflation and regulation changes through the Building Safety Act that have contributed to an increasingly challenging delivery environment. Meanwhile the pressures to deliver housing and jobs for London continue to grow. It is therefore essential that emerging planning policy establishes the optimum conditions in which to maximise the benefits that can be gained from these sites.</p> <p>The draft policies in the Local Plan 2020-2041, and particularly the site allocations 2 and 11, need to be updated to take account of the planning permissions that have been granted for these sites.</p> <p>The wording of these site allocations was first drafted before the planning applications were submitted. Now that these planning permissions have been granted, and fully supported by LB Hounslow throughout the process, there is updated evidence on what is considered appropriate on these sites. These planning permissions constitute more up-to-date and detailed site-specific evidence than the relatively high-level assessment within other evidence base documents such as the Great West Corridor Masterplan. The Local Plan 2020-2041 needs to be brought up-to-date and should reflect the planning permissions.</p>	<p>planning application stage, where they consider harm may be outweighed by material benefits, but this does not mean the original site allocations should be amended, as these are based on consideration of all planning constraints and site specific circumstances taken account of in the GWC Masterplan and the Site Allocations Capacity Assessment 2024 (Document EBSC2).</p>
		<p>TfL</p>	<p>The Movement and Access section should be expanded to note that improved pedestrian and cycle routes across the site and over Syon Lane would provide better connection with the future WLO station just south of the site.</p>	<p>Support Noted.</p> <p>The Site Allocation already strongly promotes cycling and pedestrian connectivity both within the site and to adjoining areas. The Movement and</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				Access section therefore will not be updated as it is not considered that the proposed modifications to Site 11 addresses either a matter of soundness or legality.
13	Harlequin Avenue Sub station	GLA	The site is currently designated SIL and this should be made clearer in the allocation. As written, it is not clear if the site will become LSIS or a non-designated industrial site.	LBH agrees to present modification reference HLP_SA13_01 in Document EX57 to amend the key proposal for site allocation 13 to make it clear that the site will become a non-designated industrial site.
14	2 Harlequin Avenue	GLA	The site is currently designated SIL and this should be made clearer in the allocation. As written, it is not clear if the site will become LSIS or a non-designated industrial site.	Site 14 will remain designated SIL. The Council does not consider a modification is necessary.
16	Brentside Park	Environment Agency	<p><u>Flood risk and Proximity to Watercourse</u></p> <p>The proposed development borders the river Brent and is in Flood Zones 3, 2 and is at risk of flooding in the event of a breach in the tidal flood defences. Flood defences take the form of natural high ground. We therefore recommend the following advice:</p> <ul style="list-style-type: none"> - A Flood Risk Activity Permit (FRAP) will be required for addition of the bridge – Current requirements for bridges are: - Soffit level 600mm above 1 in 100 + CC scenario - Abutments 3m back from top of bank at minimum - 10 x 10 cm in railing gaps at minimum - Sleeping accommodation must not be located below the 2100 breach level (tidal). 	<p>Comments noted. The Council has produced a Sequential and Exceptions Test report 2024 (Document EBEQ1) and the site has been assessed within the LB Hounslow Strategic Flood Risk Assessment Level 2 (2024) (Document EBEQ2) in line with EA recommendations. Please see Environment Agency & LB Hounslow Statement of Common Ground (2025) (Document S10a).</p> <p>It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<ul style="list-style-type: none"> - Large majority of the site is not within a flood zone or breach, making this a lower risk development. - Ensure where possible an 8m buffer is left between watercourse and development, any works inside of 8m will require a FRAP - Buffer zones should be enhanced to improve the riparian zone where possible.. 	that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.
		Canal & River Trust	<p>In 2019 it was advised that the allocation should seek to improve the north-south towpath, these comments have not been included.</p> <p>While east-west connectivity improvements are referenced, the new bridge to the south of the site (at Brentford Lock West) means that the delivery of a second bridge associated with the allocation appears unnecessary. Due to the span and level changes a bridge would be substantial and impacts on the character and appearance of the area and waterway users would need to be carefully considered. Therefore a new bridge is deemed unnecessary and improvements to the nearby Orbit bridge should be proposed instead.</p> <p>Any bridge crossings would need to be approved with the CRT and any new bridges would likely increase towpath use, necessitating commensurate improvements there. If the bridge is not removed, then reference to towpath improvements should be made</p> <p>References to the 'Grand Union Canal' should be made consistent throughout to avoid confusion.</p>	Comments noted. We note that C&RT have stated that they are not aware of any in principle concerns with proposed site allocations at this stage. The Council would note that, in terms of potential impacts of future development upon the canal network, Policies GB5, GB6 and EQ3 provide a suitable framework to ensure any impacts would be mitigated and that improvements to the network would be promoted. Whereas it is not considered that the comments received on this Allocation question the Plan's soundness or legality, the Council acknowledges that C&RT are the statutory body of the canal network and as such would be consulted at application stage of any proposal that impacted the canal network. Through this consultation and following design principles that are supported elsewhere in the Plan, given that no soundness issues have been raised in this representation, the Council

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				considers that any further detailed matters could be addressed at application stage.
17	Great West Plaza	Environment Agency	<p>Flood risk The proposed development borders the river Brent and is in Flood Zones 3, 2 and is at risk of flooding in the event of a breach in the tidal flood defences. Flood defences take the form of natural high ground. We therefore recommend the following advice:</p> <ul style="list-style-type: none"> - Areas of site in FZ1, best efforts should be made to place all development in this area. - Ensure where possible an 8m buffer is left between watercourse and development, any works inside of 8m will require a FRAP. - Buffer zones should be enhanced to improve the riparian zone where possible. - Development inside the 1 in 100 + CC area will require Floodplain Compensation. - Finished Floor Levels should be raised to at minimum 300mm above the 1 in 100 + CC Scenario. 	<p>Comments noted. The Council has produced a Sequential and Exceptions Test report 2024 (Document EBEQ1) and the site has been assessed within the LB Hounslow Strategic Flood Risk Assessment Level 2 (2024) (Document EBEQ2) in line with EA recommendations. Please see Environment Agency & LB Hounslow Statement of Common Ground (2025) (Document S10a).</p> <p>It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.</p>
		Canal and Rivers Trust	The SA states that development should protect and enhance access to and the quality of the existing canal towpath route to the north and south. However, this site is to the north of the canal whereas the towpath is located to the south of the waterway. It is not clear if the requirements for this allocation may have been confused with those for site 16 and our comments on	Comments noted. We note that C&RT have stated that they are not aware of any in principle concerns with proposed site allocations at this stage. The Council would note that, in terms of potential impacts of future development upon the canal network, Policies GB5, GB6 and EQ3 provide a

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			<p>the site requirements for that allocation would therefore also be relevant to this site.</p>	<p>suitable framework to ensure any impacts would be mitigated and that improvements to the network would be promoted. Whereas it is not considered that the comments received on this Allocation question the Plan's soundness or legality, the Council acknowledges that C&RT are the statutory body of the canal network and as such would be consulted at application stage of any proposal that impacted the canal network. Through this consultation and following design principles that are supported elsewhere in the Plan, given that no soundness issues have been raised in this representation, the Council considers that any further detailed matters could be addressed at application stage.</p>
18	Great West House	DNA Real Estate	<p>Suggestions are requested to the MDQs in the site allocation so it reads as follows:</p> <ul style="list-style-type: none"> • <u>400</u> residential units (Use Class C3) • <u>1,000sqm</u> of business floorspace (Use Class E(g)(i/ii)) • <u>200sqm</u> of retail floorspace (Use Class E(a-c)) • Phasing: 2025-2030 <p>It is also suggested that the Policy Map is revised to remove the site from the Key Existing Office Location, given the substantial reduction of office floorspace from the site once the prior approval has been implemented and resulting change in context as a result of the site</p>	<p>Comments noted. No changes proposed to minimum development quanta. The MDQs are based on the Great West Corridor Masterplan (EBCC4) and capacity study evidence base and are considered appropriate for the site.</p> <p>The Council considers that the Key Existing Office Location designation continues to be appropriate for the site. LB Hounslow recognises there are challenges facing the office market. However, the</p>

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			being largely a residential site. As a result, Policy ED2 will not apply to the site.	delivery of significant amounts of employment floorspace remains a key objective of the Local Plan 2020-2041, to help deliver the objectives of the London Plan Great West Corridor (GWC) Opportunity Area and of the Creative Enterprise Zone. The Employment Land Review (2024) (EBED1) also recommends that the borough's secondary office stock continues to play an important role. To take account of some of the current challenges in the office market, a modification has been proposed to Policy ED2 following the Stage 1 hearings to incorporate increased flexibility in relation to office allocations, in situations where the vacancy level of office stock across the borough is above a certain level (see proposed modification EIP_C4_19 in Document EX57).
		Canal & River Trust	This allocation should support site no.17 in its provision of improved north/south walking and cycling connections. As outlined above, rather than providing an additional bridge crossing at this location it would seem more appropriate to strengthen/improve current provision at Orbit bridge and seek to improve/strengthen north-south connections along the offside of the canal to provide better connections to Orbit bridge and the new footbridge to the south of the site.	Comments noted. We note that C&RT have stated that they are not aware of any in principle concerns with proposed site allocations at this stage. The Council would note that, in terms of potential impacts of future development upon the canal network, Policies GB5, GB6 and EQ3 provide a suitable framework to ensure any impacts would be mitigated and that improvements to the network would be

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>promoted. Whereas it is not considered that the comments received on this Allocation question the Plan's soundness or legality, the Council acknowledges that C&RT are the statutory body of the canal network and as such would be consulted at application stage of any proposal that impacted the canal network. Through this consultation and following design principles that are supported elsewhere in the Plan, given that no soundness issues have been raised in this representation, the Council considers that any further detailed matters could be addressed at application stage.</p>
19	Mille Building	Workspace Group PLC	<ol style="list-style-type: none"> 1) Evidence base compiled on behalf of the applicant, cross referenced with LBH-prepared documents, especially with regard to air quality, suggests that the exclusion of the Mille Building from residential development due to environment is unsound. Especially as other allocations are considered to be in a similar environment. The office market is found to be weak in both LBH's ELR and the Demand Assessment conducted by AND. This shows that the area is changing from a corporate HQ location to be more suited to SMEs. 2) The Mille Building should be considered in the context of structural, not cyclical, changes to the office market in the post-Covid 19 	<ol style="list-style-type: none"> 1) Comments noted but LB Hounslow disagrees. Due to the position of the site it is almost fully enclosed within areas of significant noise and air pollution. Furthermore, the elevated section of the M4 is near its highest point where it passes the site meaning the impacts of the pollution would be prevalent not only at ground level but a number of storeys above. Suitably designed residential development that would also be compliant with building heights set out in Policy

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			<p>Pandemic. Demand for large office space is down and the costs involved in refurbishment are much higher. The cost-receipt ratio in the area, as well as the surplus of office space in the area, mean that the redevelopment proposed is unviable and unreasonable.</p> <p>3) Representation supports the allocation of the Mille Building (site allocation 19) but objects to a fully commercial development allocation on the grounds of viability and deliverability.</p> <p>4) Site allocation 19: Workspace PLC welcome the principle of the allocation of the Mille Building, but dispute the allocation of purely office floorspace and the evidence rationale behind it. In order that the Plan is justified and the allocation is deliverable, residential uses should be allocated onsite. In the current building condition, the upgrades required to meet EPC standards per floor are becoming unviable, and client habits are changing to prefer more central locations. GSK moving from the area has also affected the viability of office market in the area. As a result, Workspace believe that an SME space would be better suited to the area as it currently is. A full site allocation is provided but the summary is as follows;</p> <ul style="list-style-type: none"> - 3,500 sqm business floorspcae (Class E(g)) - 300 sqm retail floorsapce (Class E (a-c)) - 60,000 sqm residential (~500 homes) and/or associated uses (Class C3/Sui Generis) 	<p>CC3 would therefore not be achievable on this constrained site. A Study was produced for the Council by WYG called 'Mille Building Air Quality and Noise Note', which helped inform the assessment of the site and the allocation itself. The Study demonstrates that in particular, due to noise pollution levels, the site is unsuitable for residential development.</p> <p>2) Comments noted. LB Hounslow recognises there are challenges facing the office market. However, the delivery of significant amounts of employment floorspace remains a key objective of the Local Plan 2020-2041, to help deliver the objectives of the London Plan Great West Corridor (GWC) Opportunity Area and of the Creative Enterprise Zone. The ELR (2024) (EBED1) also recommends that the borough's secondary office stock continues to play an important role. To take account of some of the current challenges in the office market, a modification has been proposed to Policy ED2 following the Stage 1 hearings to incorporate increased flexibility in relation to</p>

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			<p>While Workspace ‘broadly supports’ the vision of development in the allocation they present the following comments, which aim to ensure the Plan is justified, effective, and consistent with national policy</p> <p>Movement and Access: Development should conform up to the maximum parking standards in the London Plan while maximising access by walking, cycling and public transport</p> <p>Heritage Constraints: It is considered that the fact the site lies within a zone that is suitable for tall buildings should be referenced directly in the allocation.</p> <p>Site requirements: Suggestions for proposed changes to the allocation are made – in line with the above comments.</p>	<p>office allocations, in situations where the vacancy level of office stock across the borough is above a certain level (see proposed modification EIP_C4_19 in Document EX57).</p> <p>3) Comments noted and support welcomed where provided. The Council considers that the approach taken to allocating the site is sound. The Plan is supported by the Whole Plan Viability Assessment 2024 (Document EBV1)⁴⁵ which confirms the proposed allocations can be viably delivered.</p> <p>4) Comments noted. No changes are proposed. Due to the position of the site, it is almost fully enclosed within areas of significant noise and air pollution and as explained in answer to point 1 of the representation, residential development would therefore not be achievable on this constrained site.</p> <p>LB Hounslow is unable to agree to propose a modification to amend the mdq to include residential use stating “Approximately 500</p>

⁴⁵ [EBV1 – Whole Plan Viability Assessment \(2024\)](#)

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				<p>homes/ 60,000sqm specialist residential use". To accommodate this number of homes the development would need to be significantly taller than Policy CC3 – Tall Buildings of the Plan allows in the locality (which is up to 68 metres high (up to 80m AOD)– as set out in Table CC 3.2 of the Plan. This is also set out in the evidence base supporting the allocation, the Great West Corridor Masterplan (Document EBCC4), which states in relation to build heights, ‘approximately 17 commercial storeys, not exceeding 80m AOD’.</p> <p>Considerable work has been undertaken on detailed views testing for impacts on views from the UNESCO Kew World Heritage Site in neighbouring borough Richmond Upon Thames (as set out in Appendix C of the GWC Masterplan – Views (EBCC4a⁴⁶)) with extensive input from statutory consultees, to help inform heights that would be considered suitable in the locality.</p>

⁴⁶ [EBCC4a - LBH Great West Corridor Masterplan - Views Appendix \(2020\)](#)

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21	Enterprise, Boston Park Road	No representation received at Regulation 19	No representation received at Regulation 19	No representation received at Regulation 19
22	1020 Great West Road	GLA	The proposal is to intensify industrial uses on the site. The site is not currently designated industrial land and as such LBH should consider the benefits of designating the site as LSIS to apply relevant policies in the development plan to development. In addition, the intention should be to focus Class B uses here for the reasons given above.	The site is a standalone allocation, not part of a directly adjacent wider employment area and is relatively small in size (0.3 hectares). It is therefore considered below the appropriate threshold for a LSIS.
23	Texaco Filling Station, Great West Road, Brentford	GLA	The proposal is to develop industrial uses on the site either on their own or as part of co-location mixed use development. The site is not currently designated industrial land and as such LBH should consider the benefits of designating the site as LSIS or SIL to apply relevant policies in the development plan to development. In addition, the intention should be to focus Class B uses here for the reasons given above.	The site is a standalone allocation, not part of a directly adjacent wider employment area and is relatively small in size (0.22 hectares). It is therefore considered below the appropriate threshold for a LSIS.
		Environment Agency	<u>Previous contaminating land use (petrol station)</u> Petrol filling station sites represent a highly contaminative former use. These sites will require detailed intrusive investigation to characterise any soil and groundwater contamination on site, and any development scheme will be required to fully establish the risks to controlled waters. The Environment Agency recommends the removal of all underground storage tanks (USTs) that are unlikely to be reused. Once the tanks and associated pipelines have been removed, samples of soil and groundwater should be taken to check for subsurface contamination. If soil or groundwater contamination is found, additional investigations (possibly including a risk assessment) should be carried out to determine the need for	Comments noted. The “Planning Designations” section of the allocation states that in relation to land quality, “Development will be subject to compliance with Policy EQ8 of the Local Plan and any subsequent policy in order that any contamination and any historic landfill is properly considered and addressed as part of any development.” It is considered that the detailed advice provided in the EA’s comments would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application

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			<p>remediation. Refer to ‘Pollution Prevention Advice and Guidance on Storing and handling materials and products’ and ‘Defra - The Groundwater Protection Code: Petrol stations and other fuel dispensing facilities involving underground storage tanks - for England and Wales’, specifically those sections relating to decommissioning redundant underground fuel storage tanks and infrastructure.</p> <p>Please also refer to Design, construction, maintenance and decommissioning of filling stations (also known as the Blue Book (APEA/EI) – Energy Institute – 2011 The Blue Book provides detailed information on the decommissioning (and investigation) of redundant tanks, risk assessment, the design and construction criteria and maintenance procedures which we expect to be implemented.</p> <p>Further information can also be found at: LINK</p>	<p>stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.</p>
24	Layton Road car park and adjoining land	Environment Agency	<p><u>Historic landfill</u></p> <p>The Land at Layton Road site is on the Layton Road historic landfill EAHLD11054.</p> <p>The historic landfill database indicates the last date of waste input was 1865. The database indicates that inert waste was deposited and includes the waste comments sandy silt, gravel, brick, glass, charcoal and clay fill. Please refer to our comments on development on or near historic landfills on pages 19-22 (within REP106 of Document S9 - Link to Representations made pursuant to Regulation 20 (in response to consultation at Regulation 19 Stage)).</p>	<p>Comments noted. The “Planning Designations” section of the allocation states that in relation to land quality, “Development will be subject to compliance with Policy EQ8 of the Local Plan and any subsequent policy in order that any contamination and any historic landfill is properly considered and addressed as part of any development.” It is considered that the detailed advice provided in the EA’s comments would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application</p>

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				stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.
26	Phoenix Business Park	GLA	The proposal is to develop industrial uses on the site either on their own or as part of co-location mixed use development. The site is not currently designated industrial land and as such LBH should consider the benefits of designating the site as LSIS or SIL to apply relevant policies in the development plan to development. In addition, the intention should be to focus Class B uses here for the reasons given above.	<p>The site is currently designated LSIS and is proposed to remain LSIS in the emerging Hounslow Local Plan 2020-2041, as identified in the Policies Map.</p> <p>With regard to promotion of only B use classes in SIL, the Council proposes a suggested modification to Policy ED1 as outlined in the Statement of Common Ground with the GLA (Document EX5E. p26) and suggested modification reference EIP_C4_10a in Document EX57. The suggested modification states that the Council will use conditions to ensure that uses within Class E are for the appropriate sub-element of this use class with respect to the particular site, and that any permitted development rights to move to other uses are removed.</p>
		Royal London Asset Management	Representation regarding the allocation for the Phoenix Business Park. Representor is open to exploring the opportunity for optimising the use of the site, but has concerns over the development restrictions in the allocation, including limits on height.	Comments noted. Support for allocation and retention of industrial uses welcomed. All proposed allocations with an element of residential development refer to the heights specified in Table CC3.2 of Policy CC3 of the Plan, which reflects the appropriate heights identified in the Tall Buildings Study evidence base that has

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				<p>been undertaken to support the emerging Local Plan. Having regard to a number of representations received, suggested modification EIP_C6_42 in Document EX57 proposes to amend table CC3.2 so that it refers to appropriate heights rather than maximum heights. A number of further updates are proposed to Table CC3.2 of Policy CC3 which are set out in suggested modification EiP_C6_58 in Document EX57.</p>
27	Kew Bridge Distribution Centre	CEP CBRE UK Property Nominee 1 Limited and CEP CBRE UK Property Nominee 2 Limited	<p>CEP CBRE UK consider amendments are required to site allocation ref 27 to increase the minimum development quantum for housing and reduce the minimum development quantum for the flexible employment business/industrial use and to correct use classes that refer to the pre-2020 amended use classes order.</p>	<p>Comments noted. LB Hounslow has proposed suggested modification HLP_SA27_03 in Document EX57, which amends the out-of-date references to use classes, so they are in line with the current use classes order.</p> <p>No changes are proposed to the site development quanta for residential or employment uses. The minimum development quanta have been derived from capacity testing in the SACA 2024 (Document EBSC2) having regard to the Great West Corridor Masterplan and the promotional information for the site submitted by the landowner at Regulation 18 stage, with the site considered for co-location of residential and employment uses, incorporating industrial intensification. The MDQs are the minimum figure that should be achieved for specified uses at the site, which is why</p>

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				<p>it is important that they do not overestimate a site's capacity. At pre-application and planning application stage, applicants will have the opportunity to test whether an increase to the mdq could be accommodated through a suitable design solution, though applications will be expected to meet the requirements of Policy CC3 – Tall Buildings of the Plan.</p> <p>The Locally Significant Industrial Site designation is considered appropriate for the site, particularly given the intensification of uses planned to be delivered by the allocation. As such it is not considered that the removal of this designation is justified or effective.</p>
		GLA	<p>The proposal is for co-location of mixed-use development which fits the site's current LSIS designation. The focus should be on meeting non-Class E uses which are not affected by permitted development rules.</p>	<p>With regard to promotion of only B use classes in SIL, the Council considers that the proposed mix of uses is appropriate for the site. The Council proposes a suggested modification to Policy ED1 as outlined in the Statement of Common Ground with the GLA (Document EX5e. p26) and suggested modification reference EIP_C4_10a in Document EX57. The suggested modification states that the Council will use conditions to ensure that uses within Class E are for the appropriate sub-element of this use class with respect to the particular site, and that any permitted development rights to move to other uses are removed.</p>

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		TfL	In the Movement and Access section it should be stated that 'Development is to conform to the maximum parking standards in the London Plan while maximising access by walking, cycling and public transport' so that it is consistent with other site allocations.	Comments noted. Although the proposed modification does not address either soundness or legal compliance, it is considered that the proposed additional text will help in giving further clarity and consistency. As such, the wording TfL has provided is suggested as proposed modification HLP_SA27_01 in Document EX57 .
28	27 Great West Road	TfL	We note in the Movement and Access section that development should be designed to accommodate vehicular access from both Lionel Road South and Great West Road. Care should be taken when designing access arrangements to ensure that they do not negatively impact on the new public square area, WLO station safeguarding area, access to the station or the proposed Clean Air Route around the site, and that impacts on Great West Road are minimised.	Comments noted.
		The Isleworth Society	Issues regarding air pollution, noise, biodiversity and carbon impacts. Reference is made to a planning application at the site for 900 homes whilst the allocation is for 500 homes. Site Allocations should list maximum as well as minimum development quantum.	<p>Expectations for the site in relation to air quality and noise pollution are included in the proposed site allocation development requirements section. The associated evidence base, the Great West Corridor Masterplan (EBCC4), also provides guidance on how noise and air pollution at the site can be mitigated through design.</p> <p>Application proposals at the site will need to be in compliance with the requirements in Local Plan Policies GB7 – Biodiversity, EQ1 - Energy and Carbon Reduction and EQ2 – Sustainable Design</p>

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				<p>and Construction. Minimum development quanta are used in site allocations to allow a certain degree of flexibility at application stage and ensure efficient use of land avoiding sites being underutilised. Applicants may seek to demonstrate through the development management process how it would be appropriate for a proposal to exceed the MDQ. This must be subject to a suitable design solution, having regard to planning constraints and ensuring compliance with all policies in the Plan.</p> <p>The Local Plan must be positively prepared and it would therefore not be appropriate to set maximum development quantum.</p>
		Brentford Football Club	<p>Brentford Football Club consider that the site requirements for allocation ref 28 are not adequate and an additional paragraph should be added in the Site Requirements section to state that any proposed development must incontrovertibly demonstrate that it will not, and cannot in future, have any adverse or unacceptable impact on the elite sporting use and viability of the G-Tech Stadium to the south of the development in terms of the Building Orientation, Intrusive Balconies, Unconstrained Over-looking, Security (including detailed counter-terrorism risks), Daylight, Sunlight and Overshadowing, Wind Micro-Climate and Lighting.</p>	<p>Comments noted. LB Hounslow does not consider changes to the allocation are necessary. The matters raised in the representation can be dealt with through the detailed site design rationale for the site considered at planning application stage. Planning applications should also have regard to design guidance in the adopted Character Sustainability and Design Codes SPD (SPD1⁴⁷).</p>

⁴⁷ [SPD1 – Hounslow Character, Sustainability and Design Codes SPD \(2024\)](#)v

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		Hounslow Green Party	This allocation should set a maximum no. of homes as a live application has come in with 900 homes leading to air pollution, noise, biodiversity and carbon impact.	<p>The Local Plan must be positively prepared and it would therefore not be appropriate to set maximum development quantum.</p> <p>Minimum development quanta are used in site allocations to allow a certain degree of flexibility at application stage and ensure efficient use of land avoiding sites being underutilised. Applicants may seek to demonstrate through the development management process how it would be appropriate for a proposal to exceed the MDQ. This must be subject to a suitable design solution, having regard to planning constraints and ensuring compliance with all policies in the Plan.</p> <p>Expectations for the site in relation to air quality and noise pollution are included in the proposed site allocation development requirements section. The associated evidence base, the Great West Corridor Masterplan (EBCC4), also provides guidance on how noise and air pollution at the site can be mitigated through design.</p>
29	EMC Tower	TfL	The Movement and Access section should be expanded to note that improved pedestrian and cycle routes across the site and over the Great West Road would provide better connection with the future Lionel Road WLO station just south of the site.	<p>Comments noted.</p> <p>The Site Allocation already strongly promotes cycling and pedestrian connectivity both within the site and to adjoining areas including crossing facilities for the GWR and better integration to surrounding areas to the</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				south of the site. The Council therefore does not consider it is necessary to propose modifications to the Movement and Access section, as it is not considered that the TfL's suggested modifications to Site 29 would address either a matter of soundness or legality.
		Signal Resi Bidco	<ol style="list-style-type: none"> 1) Representation objects to the restriction for self storage facilities in the GWC (in policy ED2) and calls for the site allocation (29) to include reference to self storage facilities. Support for the approach to securing affordable workspace from self storage proposals in Policy ED1. 2) The representation suggests the following amendments to floorspace and phasing for Site Allocation 29: <ul style="list-style-type: none"> • 420 residential units (Use Class C3) • 8,000sqm of business floorspace (Use Class E(g)(i/ii) and/or including B8 Storage and Distribution Facilities • Phasing: 2025-2032 3) The representation explains that Prior Approval has been given for a change of use of the former Dell EMC office (15, 242sqm) into 206 no. residential units under LPA ref. PAC/2024/1307. As a result it is considered that the proposed quantum of office floorspace of 13,230sqm in the site allocation is too high and would no longer be achievable. The works associated with the change of use have already commenced. Alongside the proposed 206 residential units it would not be possible to accommodate 13,230sqm of business 	<ol style="list-style-type: none"> 1) Support for approach to affordable workspace from storage proposals noted and welcomed. Regarding the objection to the restriction for self storage facilities in the GWC, the Council considers that the requirements set out in policy ED2 are necessary, given the importance of job creation in the borough and in particular the GWC Opportunity Area, and the specific and critical role of the plan in nurturing the growth of key industries such as the creatives. 2) Comments noted. No changes proposed to minimum development quanta. The MDQs are based on the Great West Corridor Masterplan (EBCC4) and capacity study evidence base and are considered appropriate for the site. 3) Comments noted. No changes proposed. The phasing for the allocation site is based on the

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			<p>floorspace within the specified uses Class E ((g)(i/ii) on the site</p>	<p>proposed development at the allocation coming forward comprehensively. Please also refer to the comments above regarding office floorspace.</p>
30	Vantage West	No representation received at Regulation 19	No representation received at Regulation 19	No representation received at Regulation 19
32	Brentford Fountains Leisure Centre	Isleworth Society	<p>As currently worded, there is little reassurance that the site will continue to function as a leisure centre. There are no minimum quantum for uses so there is the possibility that the site be demolished and replaced with 100% residential.</p> <p>The site is relatively new so retrofit should be prioritised, the Local Plan should not propose demolition of buildings that are under 40 years old and in bad condition due to poor maintenance.</p>	<p>As per the site allocation details, it is intended that Brentford Fountain Leisure Centre will be a mixed use site including leisure use. At the time of preparing the site allocation it was necessary that some of the information included for the site remains strategic given that specific proposals for the site's future development had not yet been determined.</p> <p>A Cabinet Report called Brentford Fountain Leisure Centre redevelopment was considered by Hounslow Council's Cabinet on 20th January. The report considered three new build options developed for a replacement facility. Public engagement highlighted strong support for retaining wet and dry facilities (including a swimming pool) compared to a dry only leisure centre. Cabinet agreed to the recommendation to develop the scheme on the Fountain Leisure Centre site in Brentford based on the preferred option for a wet and dry</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				leisure centre and residential enabling development, and to submit a hybrid planning application (detailed leisure centre and outline residential). This is consistent with the Local Plan allocation.
		Environment Agency	<p><u>Historic landfill</u> Brentford Fountains Leisure Centre is on the Texas DIY historic landfill. The historic landfill database indicates the last date of last input was 1935. The database indicates that inert waste was deposited and included the waste comments clay, ash, brick, gravel, tarmac and concrete. Please refer to our comments on development on or near historic landfills on pages 19-22 (within REP106 of Document S9 - Link to Representations made pursuant to Regulation 20 (in response to consultation at Regulation 19 Stage)).</p>	Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.
		Hounslow Green Party	The representation questions the purpose of the allocation and whether it will continue as a leisure centre, raises issues of potential demolition and embodied carbon impacts, and states the leisure centre should simply be refurbished with investment.	<p>Comment noted. As per the site allocation details, it is intended that Brentford Fountain Leisure Centre will be a mixed use site including leisure use. At the time of preparing the site allocation it was necessary that some of the information included for the site remains strategic given that specific proposals for the site's future development had not yet been determined.</p> <p>A Cabinet Report called Brentford Fountain Leisure Centre redevelopment was considered by Hounslow Council's Cabinet on 20th January. The report considered three new build options developed for a replacement</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>facility. Public engagement highlighted strong support for retaining wet and dry facilities (including a swimming pool) compared to a dry only leisure centre. Cabinet agreed to the recommendation to develop the scheme on the Fountain Leisure Centre site in Brentford based on the preferred option for a wet and dry leisure centre and residential enabling development, and to submit a hybrid planning application (detailed leisure centre and outline residential). This is consistent with the Local Plan allocation.</p>
33	Esso Filling Station Chiswick Roundabout	Environment Agency	<p><u>Previous contaminating land use (petrol station)</u> Petrol filling station sites represent a highly contaminative former use. These sites will require detailed intrusive investigation to characterise any soil and groundwater contamination on site, and any development scheme will be required to fully establish the risks to controlled waters. The Environment Agency recommends the removal of all underground storage tanks (USTs) that are unlikely to be reused. Once the tanks and associated pipelines have been removed, samples of soil and groundwater should be taken to check for subsurface contamination. If soil or groundwater contamination is found, additional investigations (possibly including a risk assessment) should be carried out to determine the need for remediation. Refer to 'Pollution Prevention Advice and Guidance on Storing and handling materials and products' and 'Defra - The Groundwater Protection Code: Petrol stations and other fuel dispensing facilities involving underground storage tanks - for England and</p>	<p>Comments noted. The "Planning Designations" section of the allocation states that in relation to land quality, "Development will be subject to compliance with Policy EQ8 of the Local Plan and any subsequent policy in order that any contamination and any historic landfill is properly considered and addressed as part of any development."</p> <p>It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>Wales', specifically those sections relating to decommissioning redundant underground fuel storage tanks and infrastructure.</p> <p>Please also refer to Design, construction, maintenance and decommissioning of filling stations (also known as the Blue Book (APEA/EI) – Energy Institute – 2011 The Blue Book provides detailed information on the decommissioning (and investigation) of redundant tanks, risk assessment, the design and construction criteria and maintenance procedures which we expect to be implemented.</p> <p>Further information can also be found at: LINK</p>	
34	Former Natwest Bank Site, Chiswick	TfL	Although new and improved pedestrian and cycle crossings on the A4 and A406 are supported in principle, they will need to consider the constraints imposed by the location and issues of safety which may preclude some options. Crossings should be designed to consider the access needs of other sites such as site 35.	Noted and support welcomed. This would need to be addressed at application stage when a detailed proposal is before the Council. No modification is required, as agreed in the SoCG with TfL dated August 2025 (Document EX5a⁴⁸).
35	B&Q Chiswick	TfL	Although new and improved pedestrian and cycle crossings on the A4 and A406 are supported in principle they will need to consider the constraints imposed by the location and issues of safety which may preclude some options. Crossings should be designed to consider the access needs of other sites such as site 34.	<p>Noted and support welcomed. This would need to be addressed at application stage when a detailed proposal is before the Council.</p> <p>No modification is required, as agreed in the SoCG with TfL dated August 2025 (Document EX5a).</p>
		B&Q Ltd	1) B&Q Ltd do not believe that the Plan is legally compliant or sound and that it has not met its Duty to Cooperate. The respondent states that	1) Comments noted. This site allocation has been carried forward from the GWC

⁴⁸ [EX5a – Statement of Common Ground between LBH and TfL](#)

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>B&Q is an important and established retail store, local supplier, delivery hub and employer with a store in Chiswick.</p> <p>The B&Q store is identified as a site allocation in Figure P1.1.Policy P1(c) with B&Q listed as an allocation at Site Allocation 35. The evidence base does not justify the spatial approach envisaged by Policy TC3 as the quantitative assessment underestimates the extent of retail allocation needed as it overlooks the impact of the loss of existing retail floorspace as a direct consequence of other elements of the spatial strategy. The retail assessment takes into account the amount of expenditure absorbed by the existing B&Q store and based on this identifies the comparison floorspace needs for the plan period. The quantitative calculation, however, takes no cognisance of the plan's strategy to seek the redevelopment of the B&Q store and the impact this closure will have on the level of quantitative need in the borough and the consequent need to make suitable site allocations.</p> <p>The spatial strategy does not make allowance for the provision of a replacement level of floorspace and, even more importantly in this case, of a store of equivalent size, format and capable of serving the same function as the B&Q Chiswick store. Whilst there are retail elements to some of the site allocations, these</p>	<p>Masterplan when it was submitted by the site owner and has been tested throughout the SACA process and been found to be achievable, suitable and available. Furthermore, the site is within an opportunity area for regeneration and growth. The Retail Needs Assessment 2024 (EBED2⁴⁹) suggests that there is only a minimal comparison floorspace need within the Borough and whereas the site allocation is proposing mixed use, there is an element of retail floorspace retained within the allocation with this quantum defined as a minimum. The proposed modification is not agreed with as it is not the purpose of the Plan to find alternative provision for specific retailers and in this instance the site in question in Chiswick is being actively promoted for allocation.</p> <p>2) Comments noted. Please refer to the Council's response to point (1) regarding the B&Q site, above. The suggested approach to either delete allocation 35 or to allocate</p>

⁴⁹ [EBED2 - Hounslow Retail Study Update 2024 - Volume 1 - Main Report](#)

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>are based upon placemaking strategies and do not offer the potential for the provision of an equivalent store by size, format and function. Whilst the conclusions to the quantitative retail assessment make reference to the retail elements in the site allocations, this is only in general terms and the assessment does not include any analysis of the impact of either their provision or of the loss of existing retail uses on the level of quantitative need. In addition, the evidence base does not make any assessment of the suitability of the proposed floorspace to either meet the quantitative needs in broad terms, or in more detailed terms, the suitability of the retail elements in the site allocations to meet the need for specific types of retail format, specifically a replacement store for B&Q. This failing of the evidence base means that the spatial strategy underestimates the extent of quantitative retail need; fails to allocate sufficient sites to meet that need and fails to address the particular economic consequences arising from the planned redevelopment of the B&Q store. As the failing is not identified in the evidence base, there is no attempt to resolve it through the duty to cooperate. It is consequently considered the spatial strategy is not positively prepared; is not justified; is not effective and does not comply with national policy in that it fails to deliver sustainable economic development.</p> <p>2) The respondent states that there should be a modification so that Policy TC3 acknowledges</p>	<p>an alternative site for the reprovision of the B&Q store is not agreed with as it is not the purpose of the Plan to find alternative provision for specific retailers and in this instance the site in question is being actively promoted for allocation.</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>that where an existing retail store is lost due to the spatial allocation of the plan as set out in the site allocations, support will be afforded to the retailer to find a site for a replacement store capable of providing a comparable function and in a comparable format, even should this involve the use of designated employment land. Alternatively, the Council should allocate a retail site for the reprovision of the B&Q store in the same format capable of fulfilling the same role. Link this site to Allocation 35 thereby allowing B&Q to continue trading and to continue to serve the Chiswick area for retail and trade sales. The respondent wishes to be at examination. The respondent states that the evidence base identifies B&Q and similar stores as part of the existing retail floorspace provision in an area helping to meet local floorspace requirements. However, the plan also allocates the site for redevelopment for other purposes. Whilst this includes an element of retail floorspace it is much less than required by B&Q and, given the nature of the proposed development, is unlikely to be able to re-provide the same nature of retail space as now exists. There is consequently a gap in the evidence base where the B&Q store is taken as part of the existing retail provision serving the borough which impacts on the need to allocate more land for retail development; whilst at the same time being allocated for redevelopment for other purposes. The retail assessment does not consider the impact of their loss on the</p>	

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			supply of retail provision in the district or allocating or otherwise providing for the provision of replacement floorspace. In seeking to meet one of the identified needs, this policy approach creates another.	
36	110 Power Road	GLA	The site is currently designated LSIS and is proposed for industrial intensification which is noted and welcomed. The focus should be on meeting non Class E uses which are not affected by permitted development rules.	<p>Comments noted. Both parties have agreed to present a proposed main modification to Policy ED1, G. in through their SoCG (Document EX5e).</p> <p>With regard to promotion of only B use classes in SIL, the Council considers that the proposed mix of uses is appropriate for the site. The Council proposes a suggested modification to Policy ED1 as outlined in the Statement of Common Ground with the GLA (Document EX5e. p26) and suggested modification reference EIP_C4_10a in Document EX57. The suggested modification states that the Council will use conditions to ensure that uses within Class E are for the appropriate sub-element of this use class with respect to the particular site, and that any permitted development rights to move to other uses are removed.</p>
37	Gunnersbury Station Car Park	Chiswick Tower Ltd.	Chiswick Tower Ltd (CTL) consider that Policy ED2 is not sound because part H in relation to the loss of employment floorspace outside of SILs and LSISs should include an exemption for proposed Site Allocations in order to be effective. CTL consider this is	The Council considers that Policy ED1 Part G sets out a clear and sound framework for proposals which come forward on allocated sites.

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
		Chiswick Tower Ltd	<p>particularly pertinent for their site. CTL propose a modification to ED2 accordingly.</p> <p>CTL state that updates to the wording of Site Allocation 37, sought by them in response to the Great West Corridor site capacity exercise, do not appear to have been incorporated. As a result, the effectiveness and deliverability of the allocation is questioned. The respondent makes suggestions for changes to the allocation that would improve deliverability. CTL request to speak at the examination.</p>	<p>Comments noted. The Local Plan is supported by the Site Allocations and Capacity Assessment (SACA, Document EBSC2) which assesses sites for their suitability, availability and achievability. Sites submitted in the Call for Sites and Regulation 18 consultation stage were included within the assessment. This includes site allocation ref 37.</p> <p>As demonstrated by the Local Housing Needs Assessment (Document EBSC3⁵⁰), there is very limited need for co-living accommodation in LB Hounslow and it was therefore not considered appropriate or justified to include a proposed co-living development at Chiswick Tower as part of the minimum development quanta for site allocation ref 37. LB Hounslow is aware that a planning application has been submitted on land partially outside the site allocation boundary which includes Chiswick Tower. This is being considered as part of the planning application process and it is not necessary for the site allocation boundary to be redrawn to include the adjoining land subject to this application.</p>

⁵⁰ [EBSC3 – Local Housing Needs Assessment](#)

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
		Environment Agency	Flood risk The proposed development is in Flood Zone 2 (Tidal), however, is outside of the tidal breach extent. We recommend the sequential approach is followed.	Comments noted. The Council has produced a Sequential and Exceptions Test report 2024 (Document EBEQ1) in line with EA recommendations. Please see Environment Agency & LB Hounslow Statement of Common Ground (2025)(Document S10a).
43	Heathrow International Trading Estate	National Grid	Modification requested to allocation: The development will include a strategy for responding to the NGET Underground Cable Routes present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.”	Comments noted. Guidance regarding National Grid Electricity Transmission assets and how to ensure development does not adversely impact on essential infrastructure is welcomed. National Grid have been consulted throughout the preparation of the Local Plan to ensure that the proposed site allocations would not compromise operation of the electricity network. At planning application stage, development proposals will be required to demonstrate that their design has regard to the NGET Design Guide and Principles. It is therefore not considered that any modifications are required to be made to the site allocations referred to in this representation.
		GLA	The site is currently designated as LSIS and the proposed uses are for Class B uses. As such LBH could consider designating the site as SIL which could provide greater protection of industrial capacity in the long term.	The Council considers that LSIS is an appropriate designation for this site, alongside the allocation which specifies B2 and B8 uses only.
		TfL	For consistency, please add in under site requirements: ‘The Site is adjacent to the A312 a major distributor	Comments noted. Both proposed changes are considered to be necessary to give the Site Allocation

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>road and TfL Red Route. Development should not adversely impact the transport network.'</p> <p>We welcome the following requirement if it is amended as shown in red: 'Access to the site should be maintained from Green Lane, with any proposed vehicular access to the A312 to be agreed with TfL. Access should <u>not increase road danger and</u> be designed to minimise impact on active travel modes. Access should also contribute towards meeting the modal shift targets in the London Transportation Plan by providing safe and pedestrian friendly walking and cycling accesses and routes to and from nearby centres and public transport hubs, and rebalancing design in favour of pedestrians and cyclists to the site through features such as pavement width, separated routes, landscaping, lighting and other measures.'</p>	<p>greater clarity and consistency.</p> <p>The following is proposed as a modification to the Movement and Access section, as agreed in the SoCG between LB Hounslow and TfL (Document EX5a): 'Access to the site should be maintained from Green Lane, with any proposed vehicular access to the A312 to be agreed with TfL. Access should <u>not increase road danger and</u> be designed to minimise impact on active travel modes. Access should also contribute towards meeting the modal shift targets in the London Transportation Plan by providing safe and pedestrian friendly walking and cycling accesses and routes to and from nearby centres and public transport hubs, and rebalancing design in favour of pedestrians and cyclists to the site through (EX57: HLP_SA43_01)</p>
		SEGRO	<p>1) SEGRO supports the application with the following changes requested:</p> <ul style="list-style-type: none"> - The use classes should be broadened to include Class E (g) - Intensification should be encouraged but not necessarily mandatory for the site - Allocation should be amended so that the strip of GB land in the north of the estate is redesignated as employment land 	<p>1) Comments noted and support welcomed where provided. No further amendments are proposed with respect to Green Belt boundaries. Where Green Belt land is proposed to be released, the amended boundary consistently reflects site allocation boundaries. The Council considers that the need</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>The Heathrow International Trading Estate is reaching the end of its life and SEGRO is seeking to modernise. Consequently, SEGRO supports the retention of the site as an LSIS and a draft allocation. They request flexibility in the allocation to allow for modernisation and operational flexibility, to respond to the market, rather than just intensification.</p> <p>SEGRO opposes mandates for affordable workspace provision due to viability and suitability concerns, given the absence of evidence of viability and need in the WoB.</p> <p>2) SEGRO requests that a strip of land to the north of the estate be removed from the Green Belt</p> <p>SEGRO requests that the above GB release change also be made in Policies Map.</p>	<p>for affordable workspace arises across the borough and therefore that the approach to seeking such provision at this site is, subject to development meeting proposed thresholds, justified. The evidence in the Employment Land Review 2024 (EBED1) demonstrates there is a specifically acute need for B8 and to a lesser extent B2 uses. It is therefore considered that these uses are appropriate for allocation 43, and additional flexibility to also include E(g) light industrial uses is not considered justified or effective.</p> <p>2) The Council considers that exceptional circumstances have not been met to release the strip of land to the north of the estate referred to in Segro's representation from the Green Belt</p>
		Environment Agency	<p><u>Historic landfill</u></p> <p>The Heathrow International Trading Estate is on the Green Lane historic landfill. The historic landfill database indicates waste was deposited between 1963 and 1970. The landfill was unlicensed. The included waste comments are brick, paper, wood, concrete, metal, rubber, tyres, ash, plastic, pottery and clay. Please refer to our comments on development on or near historic landfills on pages 19-22 (within REP106 of</p>	<p>Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>Document S9 - Link to Representations made pursuant to Regulation 20 (in response to consultation at Regulation 19 Stage)).</p> <p>Flood risk The proposed development is partially within Flood Zone 2 (Fluvial). We therefore recommend the following advice:</p> <ul style="list-style-type: none"> - The applicant should reassess flood risk at this site when new Crane Modelling becomes available. - Ensure where possible an 8m buffer is left between watercourse and development, any works inside of 8m will require a FRAP. - Buffer zones should be enhanced to improve the riparian zone where possible. 	<p>interim, we do not propose any modifications to the Plan in relation to this.</p> <p>The Council has produced a Sequential and Exceptions Test report 2024 (Document EBEQ1) and the site has been assessed within the LB Hounslow Strategic Flood Risk Assessment Level 2 (2024) (Document EBEQ2) in line with EA recommendations. Please see Environment Agency & LB Hounslow Statement of Common Ground (2025) (Document S10a).</p>
44	Central Park Trading Estate	CPRE	Allocation 44 – this site is connected to the wider Green Belt, thereby creating a Green Chain and nature corridor.	Comment noted. It is critical for the plan to optimise land to help reduce the significant shortfall of industrial floorspace requirements. In these cases, it considers that exceptional circumstances are demonstrated for releasing land at this for development. The plan would protect existing open spaces and would require compensatory improvements to existing Green Belt land.
		GLA	This site is one identified for Green Belt release and to be designated as LSIS. See earlier comments.	The Council considers that LSIS is an appropriate designation for this site, alongside the allocation which specifies B2 and B8 uses only.

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
		TfL	We welcome the following requirement if it is amended as shown [below]: ‘Development should provide new and improved routes within and around the site for pedestrians and cyclists including links to public transport nodes and services, etc. Roads within the site should be designed to provide safe and legible walking and cycling access. Development should contribute towards improved public transport and active travel accessibility to reduce the need for employees to travel by car and should seek to increase the PTAL of the site. Development should be designed in accordance with Healthy Streets principles.’	Comments noted. The Site Allocation already sufficiently promotes active travel within the Movement and Access section of the site allocation. The Site Allocation therefore will not be updated as it is not considered that the proposed modifications to Site 44 addresses either a matter of soundness or legality.
		Environment Agency	Historic landfill The Central Park Trading Estate is on the St Albans Farm East historic landfill. The historic landfill database indicates waste was deposited between 1940 and 1947. The landfill was unlicensed. Please refer to our comments on development on or near historic landfills on pages 19-22 (within REP106 of Document S9 - Link to Representations made pursuant to Regulation 20 (in response to consultation at Regulation 19 Stage)).	Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.
45	Land at Green Lane	CPRE	This site should be retained as a green space and could be repurposed as a public park.	Comments noted. Document EBGB7⁵¹ (pp.59-61) states that the Land at Green Lane has not been in use as allotments for over c.30 years at the time of the study. Therefore, it is considered to be surplus to requirements and available for allocation to help meet housing needs.
		TfL	We welcome the following requirement if it is amended as shown [below]: ‘Development should provide new	Comments noted.

⁵¹ [EBGB7 – LBH Open Space Study](#)

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			and improved routes within and around the site for pedestrians and cyclists including links to public transport nodes and services, etc. Roads within the site should be designed to provide safe and legible walking and cycling access. Development should contribute towards improved public transport and active travel accessibility to reduce the need for employees to travel by car and should seek to increase the PTAL of the site. Development should be designed in accordance with Healthy Streets principles.’	LBH considers that the allocation already sufficiently promotes active travel within the Movement and Access section of the site allocation. The Site Allocation therefore will not be updated as it is not considered that the proposed modifications to Site 45 addresses either a matter of soundness or legality.
46	Ron Smith Recycling, Green Lane	FORCE	FORCE provide details of their organisational background and focus. FORCE attended the examination of the withdrawn GWC and WoB plan reviews in November 2021 and raised strong opposition to the proposed treatment of Green Belt. FORCE welcome the scaling back of the land proposed to be removed from the Green Belt in the current Reg 19 draft Local Plan but are disappointed as a very significant quantum of open space is proposed to be allocated for development and this is not justified by sufficient evidence. FORCE strongly object to Site Allocations: 57 Land at Hatton Fields; 48: Vacant Land at Dick Turpin Way; 46: Ron Smith Recycling, Green Lane; 77: Land South of Western International Market; and 122: Rectory Farm. FORCE consider the proposals to be unsound for a number of overarching reasons set out in their representation. Consideration should also be given to the impact of this allocation on neighbouring SINC.	Comments noted. These comments relate to the spatial strategy/strategic issues, rather than site-specific comments. The allocation provides clear direction on how future development should consider impacts upon the SINC land within the red line boundary and immediately adjoining the site, in line with emerging Policy GB7.
		CPRE	This site is connected the wider Green Belt and located next to a SINC.	Comment noted. The allocation provides clear direction on how future development should consider impacts upon the SINC land immediately adjoining the site, in line

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				with emerging Policy GB7. The plan also requires development here to contribute towards compensatory improvements to remaining Green Belt land.
		GLA	This site is one identified for Green Belt release and to be designated as LSIS. See earlier comments.	The Council considers that LSIS is an appropriate designation for this site, alongside the allocation which specifies B2, B8 and waste uses only.
		TfL	We welcome the following requirement if it is amended as shown [below]: 'Development should provide new and improved routes within and around the site for pedestrians and cyclists including links to public transport nodes and services, etc. Roads within the site should be designed to provide safe and legible walking and cycling access. Development should contribute towards improved public transport and active travel accessibility to reduce the need for employees to travel by car and should seek to increase the PTAL of the site. Development should be designed in accordance with Healthy Streets principles.'	Comments noted. LBH considers that the allocation already sufficiently promotes active travel within the Movement and Access section of the site allocation. The Site Allocation therefore will not be updated as it is not considered that the proposed modifications to Site 46 addresses either a matter of soundness or legality.
		Environment Agency	<u>Historic landfill</u> The Ron Smith Recycling site is on the St Albans Farm West historic landfill. The historic landfill database indicates inert waste was deposited between 1935 and 1939. The landfill was unlicensed. Please refer to our comments on development on or near historic landfills on pages 19-22 (within REP106 of Document S9 - Link to Representations made pursuant to Regulation 20 (in response to consultation at Regulation 19 Stage)). <u>Flood risk</u>	Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>The proposed development is in Flood Zone 2. We therefore recommend the following advice:</p> <ul style="list-style-type: none"> - Ensure where possible an 8m buffer is left between watercourse and development, however, this is not a statutory main river, so not required, just recommended. - Buffer zones should be enhanced to improve the riparian zone where possible. 	<p>The Council has produced a Sequential and Exceptions Test report 2024 (Document EBEQ1) and the site has been assessed within the LB Hounslow Strategic Flood Risk Assessment Level 2 (2024) (Document EBEQ2) in line with EA recommendations. Please see Environment Agency & LB Hounslow Statement of Common Ground (2025) (Document S10a).</p>
48	Vacant Land at Dick Turpin Way	FORCE	<p>FORCE provide details of their organisational background and focus. FORCE attended the examination of the withdrawn GWC and WoB plan reviews in November 2021 and raised strong opposition to the proposed treatment of Green Belt. FORCE welcomes the scaling back of the land proposed to be removed from the Green Belt in the current Reg 19 draft Local Plan but are disappointed as a very significant quantum of open space is proposed to be allocated for development and this is not justified by sufficient evidence. FORCE strongly object to Site Allocations: 57 Land at Hatton Fields; 48: Vacant Land at Dick Turpin Way; 46: Ron Smith Recycling, Green Lane; 77: Land South of Western International Market; and 122: Rectory Farm. FORCE consider the proposals to be unsound for a number of overarching reasons set out in their representation. Consideration should also be given to the impact of this allocation on neighbouring SINC.</p>	<p>Comments noted. These comments relate to the spatial strategy/strategic issues, rather than site-specific comments.</p> <p>The allocation provides clear direction on how future development should consider impacts upon the SINC land immediately adjoining the site, in line with emerging Policy GB7.</p>
		CPRE	<p>Site meets Green Belt purposes, adjacent to SINC, creates nature corridor, part of larger Green Belt.</p>	<p>Comment noted. It is critical for the plan to optimise land to help reduce the significant shortfall of industrial floorspace</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				requirements. In these cases, it considers that exceptional circumstances are demonstrated for releasing land at this site for development. The plan would protect existing open spaces and would require compensatory improvements to existing Green Belt land.
		GLA	This site is one identified for Green Belt release and to be designated as LSIS. See earlier comments.	The Council considers that LSIS is an appropriate designation for this site, alongside the allocation which specifies B2 and B8 uses only.
		TfL	We note the following requirement but request that it is amended as shown in red because any new vehicle access from Great West Road will not be supported by TfL: 'Appropriately designed vehicular access to the site should be from the A30 Great South West Road or Faggs Road . Vehicular access should be designed to minimise impact on active travel modes. Pedestrian and cycle access should be provided to the Great South West Road, Dick Turpin Way and Faggs Road. It should also contribute towards meeting the modal shift targets in the London Transportation Plan by providing safe and pedestrian friendly walking and cycling accesses and routes to and from nearby centres and public transport hubs, and rebalancing design in favour of pedestrians and cyclists to the site through features such as pavement width, separated routes, landscaping, lighting and other measures.'	Comments noted. Whereas the proposed modification does not address either soundness or legality, it is considered that some proposed altered additional text will help in giving further clarity to the Site Allocation and allow flexibility in determining the positioning of safest access location on to the site. As such, wording will be suggested as a proposed minor modification, as agreed in Document EX5a . <u>Movement and Access</u> Appropriately designed vehicular access to the site should be provided from the A30 Great South West Road or Faggs Road . Vehicular access should be designed to minimise impact on active travel modes. Pedestrian and cycle access should be provided to the Great South

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>West Road, Dick Turpin Way and Faggs Road. It should also contribute towards meeting the modal shift targets in the London Transportation Plan by providing safe and pedestrian friendly walking and cycling accesses and routes to and from nearby centres and public transport hubs, and rebalancing design in favour of pedestrians and cyclists to the site through features such as pavement width, separated routes, landscaping, lighting and other measures.'</p> <p>(EX57: HLP_SA48_01)</p>
		<p>SEGRO</p>	<p>Vacant Land at Dick Turpin Way: Allocation 48 SEGRO supports the application with the following changes requested: - The quantum of development be given as 'approximately 14101sqm' - Phasing be changed to 2026-2036 to accord with the phasing of Allocation 57 A planning application will be submitted following the adoption of the new local plan.</p>	<p>Comments noted and support welcomed where provided. No change is proposed to the specified floorspace. The site allocations are expressed as minimum development quantums, and subject to suitable design solutions, a case may be put forward at planning application stage for exceeding the mdq figure. No change is proposed to the phasing of the site. Should a site come forward later than its intended phasing in the allocation this would preclude a proposal coming forward at the later stage.</p>
		<p>Environment Agency</p>	<p><u>Historic landfill</u> Vacant Land at Dick Turpin Way is next to the 'Straddling the Causeway' historic landfill. The historic landfill database indicates waste was deposited between 1945 to 1951. The landfill was unlicensed. Please refer to our comments on development on or near historic landfills on pages 19-22 (within REP106 of Document S9 - Link</p>	<p>Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			to Representations made pursuant to Regulation 20 (in response to consultation at Regulation 19 Stage) .	<p>advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.</p>
49	Site at Faggs Road	CPRE	<p>This site should be retained as part of the open green space and used for nature recovery and as public open space.</p>	<p>The Council considers that exceptional circumstances are demonstrated for the release of land here for development, to help meet employment needs. A significant portion of the adjacent site allocation at Land at Hatton Fields (site allocation 57) would remain within the Green Belt. This would be retained as open space and would be provided as a community nature zone, with improved accessibility for local residents.</p>
		GLA	<p>Part of the proposed site allocation is in Green Belt and as such this should be made explicitly clear. The allocation should be amended accordingly and make it clear which part of the site is to be released from Green Belt designation.</p>	<p>LBH agrees to present the following modification to the key proposal:</p> <p>The site at Faggs Road will be extended to provide additional industrial business space and units to support the borough's future employment needs. The western area of the site which was previously designated part of the Metropolitan Green Belt has been released for employment development and is no longer part of the Green Belt, as shown in Appendix 2 (Land Proposed to be Released from the Green Belt to Meet Development Needs) of the Hounslow Local Plan 2020-2041 and on the Hounslow Local Plan 2020-2041 Policies Map.</p> <p>(EX57: HLP_SA49_01)</p>

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50	Tesco Dukes Green Avenue	No representation received at Regulation 19	No representation received at Regulation 19	No representation received at Regulation 19
51	Network House Feltham	REP076 Network Rail redacted.pdf	The representation relates to Allocation 51. It states that Network Rail is supportive of the allocation but that the site should be maximised and contends that the height of 9 storeys and the designation of 200 housing units be taken as minimums.	<p>Comments noted and support welcomed. A Tall Buildings Study was produced as supporting evidence for emerging Policy CC3 - Tall Buildings. The study informed the appropriate heights that are stated in Table CC3.2, which is cross referenced in relevant site allocations. Modifications are proposed in Document EX57 to Part L of the Policy CC3 to more closely align with the expectations of the London Plan 'Tall buildings should be of an appropriate height, as indicated in Table CC3.2 Not exceed the maximum building heights for that site or area, as set out in Table CC3.2'</p> <p>As per discussions at Stage 1 Hearing sessions, the MDQs in the Site Allocations remain as they are described – a minimum, and are not a ceiling on capacity subject to site constraints and other planning considerations.</p>
		REP106 Environment Agency redacted.pdf	<p>Previous contaminating land use (railway signal and maintenance depot)</p> <p>Railway depot / maintenance sites represent a highly contaminative former use.</p> <p>These sites will require detailed intrusive investigation to characterise any soil and groundwater contamination on site, and any development scheme will be required to fully establish the risks to controlled waters.</p>	<p>Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the</p>

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			Further information can be found at: LINK	interim, we do not propose any modifications to the Plan in relation to this.
52	Lidl Feltham	REP106 Environment Agency_redacted.pdf	<u>Proximity to a Main River</u> St Catherines House and Car Park is in proximity to the River Longford, a designated Main River. A minimum 8m riparian/buffer zone must be provided. Any work within 8m will also require a FRAP. <u>Water Vole</u> Our maps indicate the presence of water vole at this site. Developers must conduct an appropriate survey undertaken by a qualified ecologist in line with the industry requirements.	Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.
55	Scout Hut Bedfont Lane	REP106 Environment Agency_redacted.pdf	<u>Historic landfill</u> The Scout Hut Bedfont Land site is on the Blenheim Park historic landfill. The historic landfill database indicates waste was deposited between 1945 to 1955. The database indicates that inert waste was deposited and included the waste comments clay, silt, stone, brick, concrete ash and wood. Please refer to our comments on development on or near historic landfills on pages 19-22 (within REP106 of Document S9 - Link to Representations made pursuant to Regulation 20 (in response to consultation at Regulation 19 Stage)).	Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.
57	Land at Hatton Fields	FORCE	1) FORCE state that the emerging Local Plan should provide further details on the mechanisms to secure compensatory improvements, rather than establishing this through a subsequent SPD. FORCE maintain that without assessing the impact of the loss, and understanding the proposed mechanism for funding and implementing off-setting, there are uncertainties relating to whether the	1) Comments noted. The plan clearly sets out how compensatory improvements to the existing Green Belt would be focused on improvements to access and environmental value of parts of the Crane Valley corridor and nearby green infrastructure. Schemes to

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>potential off-setting would be sufficient or achievable. FORCE also state that, given a lack of a comprehensive ecological assessment, there are uncertainties around the ability to secure a 10% biodiversity net gain approach across the wider Hatton Field site as set out in emerging policy P3 C.</p> <p>2) FORCE understand that Friends of Hatton Fields have commissioned an assessment of the Hatton Fields site that demonstrates species at risk include soprano pipistrelle and noctule bats, woodpeckers, house sparrows, starlings, dunnocks and small blue butterflies as well as the common toad and lizard. FORCE has undertaken their own surveys of bats at this site which revealed how the site is very actively used by bats (a protected species).</p> <p>3) FORCE provide details of their organisational background and focus. FORCE attended the examination of the withdrawn GWC and WoB plan reviews in November 2021 and raised strong opposition to the proposed treatment of Green Belt. FORCE welcome the scaling back of the land proposed to be removed from the Green Belt in the current Reg 19 draft Local Plan but are disappointed as a very significant quantum of open space is proposed to be allocated for development and this is not justified by sufficient evidence. FORCE strongly object to Site Allocations: 57 Land at Hatton Fields; 48: Vacant Land at Dick Turpin Way; 46:</p>	<p>provide enhancements would enhance biodiversity value and would provide tangible improvements to green space access for local communities. With the principle for seeking these contributions established in the plan, the Council considers that it would be appropriate for the detailed mechanism for securing these improvements to be set out in the annually updated Infrastructure Delivery Plan (EBID1⁵²). In terms of securing BNG, it should be noted that Policy P3 C sets out a strategic ambition for delivery of 10% BNG across the wider Hatton Fields site, but it is for a development proposal to demonstrate how this can be achieved. This will be assessed in line with the requirements of the statutory framework for BNG, and with consideration to emerging policy GB7 which sets out the proposed local planning policy approach at clause H.</p> <p>2) Comments noted. Policy GB7 provides a sound framework for protecting priority species.</p>

⁵² [EBID 1 – Infrastructure Delivery Plan \(May 2025\)](#)

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			<p>Ron Smith Recycling, Green Lane; 77: Land South of Western International Market; and 122: Rectory Farm. FORCE consider the proposals to be unsound for a number of overarching reasons set out in their representation.</p> <p>4) Consideration should also be given to the impact of this allocation on neighbouring SINC.</p>	<p>Development proposals on the site would need to provide a comprehensive ecological study to ensure that impacts upon protected species have been fully assessed, and any necessary protective measures and/or mitigation will be secured through the development management process.</p> <p>3) Comments noted. These comments relate to the spatial strategy/strategic issues, rather than site-specific comments.</p> <p>4) The allocation provides clear direction on how future development should consider impacts upon the SINC land within the red line boundary and immediately adjoining the site, in line with emerging Policy GB7.</p>
		<p>CPRE</p>	<p>Support for scaling back GB Release, however the remaining site clearly fulfils Green Belt purposes and should not be allocated for development. The respondent gives further details</p>	<p>Comment noted. It is critical for the plan to optimise land to help reduce the significant shortfall of industrial floorspace requirements. The Council acknowledges that the site meets Green Belt purposes moderately, but notes that the Green Belt Assessment recommended it for further consideration. Overall, it considers that exceptional circumstances are demonstrated for releasing some of the land for development. It should be noted</p>

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				<p>that the area of the site to be released from the Green Belt is currently privately owned land and therefore not publicly accessible. The area of release is also not subject to any ecological designations. The remaining larger area of the site allocation is not proposed to be released from the Green Belt. The plan would protect existing open spaces in the part of the site not released from the Green Belt and would require the provision of a community nature zone and biodiversity enhancements at the wider site - these would be critical pieces of green infrastructure.</p>
		<p>Hounslow Borough Friends of the Earth</p>	<ol style="list-style-type: none"> 1) Hounslow Friends of the Earth summarise importance of Hatton Farm (Land at Hatton Fields) site and summarise reasons why it should be conserved. 2) Hounslow Friends of the Earth (HFotE) state that Hatton Fields is important for community health and wellbeing and cite a UK Health Security Agency paper “Green space, Mental - Wellbeing and Sustainable Communities” (2016). HFotE state that the Council is not doing enough to protect health & wellbeing by releasing the site from the green belt. 3) Hounslow Friends of the Earth (HFotE) note that Hatton Fields is a SINC of Grade 1 Borough Importance, and state that releasing the northern portion of the site would reduce biodiversity across the wider site. HFotE raise 	<ol style="list-style-type: none"> 1) Comment noted. It is critical for the plan to optimise land to help reduce the significant shortfall of industrial floorspace requirements. In this case, it considers that exceptional circumstances are demonstrated for releasing some of the land for development. It should be noted that the area of the site to be released from the Green Belt is currently private land and therefore not publicly accessible. The area of release is also not subject to any ecological designations. The remaining larger area of the site allocation is not proposed to be released from the

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			<p>concerns relating to the government's BNG approach, and quote from the Hounslow NRAP.</p> <p>4) It is considered that the plan for warehousing on at Allocation 57 – Land at Hatton Fields is incompatible with the London Plan Policy G2 as warehousing is inappropriate development and exceptional circumstances have not been demonstrated.</p> <p>It is considered that plans for Hatton Fields do not represent Good Growth in line with the London Plan aspirations for the Opportunity Area as development would not be sustainable. It is also considered that few jobs would be gained from the development at Hatton Fields as the industry is rapidly automating.</p> <p>The representation argues that housing/employment targets are not justification to release Green Belt and that LB Hillingdon has capacity to fulfil employment figures without releasing Green Belt.</p>	<p>Green Belt. The plan would protect existing open spaces in the part of the site not released from the Green Belt and would require the provision of a community nature zone and biodiversity enhancements at the wider site - these would be critical pieces of green infrastructure. The Council has fully explored the potential for using existing sites for additional industrial development and brought forward allocations where appropriate. It has also engaged with the Duty to Co-operate and neighbouring boroughs have confirmed that there is no scope for them to help meet Hounslow's need for employment land.</p> <p>2) Comments noted. The Council recognises the importance of Hatton Fields and other open spaces to the local community, including the important role of these spaces in supporting health and wellbeing. It should be noted that the area of the site to be released from the Green Belt is currently privately owned land and therefore not publicly accessible. A significant portion of the allocation would remain within the</p>

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				<p>Green Belt. This would be retained as open space and would be provided as a community nature zone, with improved accessibility for local residents. Existing uses including the horse paddocks, Urban Farm and Cemetery (with potential for extension) would be retained.</p> <p>The areas of Hatton Fields that are designated as a SINC are not proposed to be released from the Green Belt, and that portion of the site proposed for release is currently inaccessible grassland habitat. An ecological survey of this area would be required as part of any future application, and this would inform an assessment of the habitat units required to achieve 10% biodiversity net gain (BNG) through development as per the statutory framework. The elements of the site that will remain in the Green Belt will receive compensatory improvements including access to a community nature zone, and potentially habitat enhancements and creation as part of BNG requirements. The allocation and place policy ensure the SINC will be protected and harm mitigated,</p>

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				<p>and BNG delivered as per statutory requirements. As such, emerging policies have been proposed to address these matters and these are considered to be sound.</p> <p>3) Comment noted. It is critical for the plan to optimise land to help reduce the significant shortfall of industrial floorspace requirements. In this case, it considers that exceptional circumstances are demonstrated for releasing some of the land for development. The Council's evidence base clearly states that land is needed to help meet industrial development requirements, which is critical for the economy of the borough, including job creation. The Council has engaged with LB Hillingdon through the Duty to Co-operate and Hillingdon has confirmed that it does not have any scope to assist in meeting Hounslow's development needs.</p>
		LB Hillingdon	<p>Hillingdon previously objected to this site allocation, with the explanation set out in our letter dated 13 October 2021. In summary:</p>	<p>Comments noted. Support for the reduction of the area to be released from the Green Belt at site allocation 57 also welcomed. It should be noted that the Employment Land Review Update (EBED1) identifies that even when</p>

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			<ul style="list-style-type: none"> • The Green Belt Review concluded that the site is still performing moderately well against the purposes of its designation. • The additional industrial floorspace was not justified as the Local Plan was planning for a significant overprovision of industrial floorspace against identified need. • Heathrow expansion does not justify an exceptional circumstance due to the uncertainty of the project progressing during the plan period, and if progressed would justify preparation of a revised Local Plan due to the scale of change needed. • The proposal fails the exceptional circumstances test for development Green Belt land. <p>We note that the area proposed to be released from Green Belt has been reduced, which is supported as it reduces harm to the Green Belt.</p> <p>Hillingdon argues that this site should be removed and not be included as a site allocation.</p>	<p>accounting for planning consents and proposed allocations including sites that are proposed to be released from the Green Belt to meet industrial employment needs, there remains a shortfall of land for this type of use in Hounslow. Furthermore, it should be noted that the identified employment needs are not predicated solely on the delivery of a third runway at Heathrow.</p> <p>LB Hounslow consider that exceptional circumstances have been demonstrated to release land here from the Green Belt to meet specific needs for warehousing and logistics floorspace in the West of the Borough area. LB Hounslow do not agree that these sites should be removed as allocations to make the emerging plan sound.</p> <p>It should be noted that the approach taken to Green Belt release in the emerging Local Plan is to reflect the proposed allocation boundaries, where allocation sites are proposed to be released from the Green Belt.</p>
		Mr Cliff Watson	<p>Objection to the release of Land at Hatton Fields from the Green Belt for development. Objection made on the grounds of: loss of open space; harm to mental health of local residents; loss of land for grazing and dog walking and other recreational activities; impact on biodiversity. Representor argues that better use could be made of the North Feltham Trading Estate.</p>	<p>Comment noted. It is critical for the plan to optimise land to help reduce the significant shortfall of industrial floorspace requirements. In this case, it considers that exceptional circumstances are demonstrated for releasing some of the land for development.</p>

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				<p>The proposed plan would protect existing open spaces and would require the provision of a community nature zone and biodiversity enhancements at the wider site, delivering public benefits. It should be noted that the areas in the north of the site that are proposed for development are not currently publicly accessible, so there would be no impact on recreational activities.</p>
		<p>GLA</p>	<p>This site is one identified for Green Belt release and to be designated as LSIS. See earlier comments.</p>	<p>The Council considers that LSIS is an appropriate designation for this site, alongside the allocation which specifies B2 and B8 uses only.</p>
		<p>The Isleworth Society</p>	<p>TIS do not accept that the exceptional circumstances for Green Belt release have been met and oppose the use of all Site Allocations for industrial use on the Green Belt. Including land at Hatton Fields (site 57). TIS find assumptions regarding extra employment for air freight in the vicinity of Heathrow Airport as Not Sound. The increase in air freight and aviation in general is not compatible with the Climate Emergency and 1.5C temperature targets. All references to Land at Hatton Fields in the Local Plan should be removed.</p>	<p>The Council considers that exceptional circumstances are demonstrated for the release of Green Belt land in a limited number of instances - this includes the substantial requirement for employment land and the borough's inability to meet this need on existing sites. The allocations for these release sites outline a number of development requirements, including environmental enhancements and compensatory improvements to the existing Green Belt - the latter is likely to include enhancements to the Crane Valley corridor.</p>

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				The requirements reflect the identified growth needs of the logistics sector serving current operations at Heathrow as well as other businesses in the area, rather than any particular increase in air freight or aviation.
		National Air Traffic Services	Representation objects to the exclusion of the NATS Faggs Road site from being removed from the Green Belt and proposes that the site is allocated for employment development.	The Council does not consider that exceptional circumstances are demonstrated for the release of land for development at this location. The area in the south of Hatton Fields is to be used for a community nature zone and biodiversity enhancements, which are critical pieces of Green Infrastructure. The area referred to would be constrained by lack of highways access.
		JCAL	Objection to the exclusion of a portion of land at the north-western edge of the Land at Hatton Fields site from the area released from the Green Belt for development. Highlighting that this excluded area includes brownfield land.	Comments noted. The Council considers that Exceptional Circumstances are demonstrated for release of a selective number of sites for employment development to help alleviate the significant shortfall of industrial land near to Heathrow, as outlined in the policies map. These sites are all proposing a significant additional quantum of employment floorspace. Outside these proposed allocations (and the allocations for traveller sites), the Council does not consider that exceptional circumstances are demonstrated for the release of land from the Green Belt.
		SEGRO	1) Supports principle of policy but requests the following changes: -label vegetated buffer as	1) The Council considers that the policy as drafted is sound.

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			<p>'indicative' (as the detailed landscape work has not yet been undertaken') -insert the word 'remaining' before the reference to 'open spaces' and update Figure 2.4 to clearly show the area of protected open space to ensure split of land uses is clearly shown -refer to floorspace figure as 'approximately 63,450 sqm' throughout the plan, for consistency with the evidence base.</p> <p>2) Land at Hatton Fields: Allocation 57 SEGRO supports the application with the following changes requested: - Updated the PSZ on the illustrative diagram - The policy designation is updated to refer to Policy P2 (c): Land at Hatton Fields - That the floorspace figure be given as 'approximately 63,450 sqm' throughout the Plan.</p>	<p>2) Comments noted and support welcomed. LB Hounslow confirms that a suggested modification will be presented to update the Illustrative Diagram in Allocation 57 to show the revised public safety zone boundary, which was updated after the Regulation 19 version of the Local Plan was finalised (Document EX57: HLP_SA57_01). A suggested modification will also be made to correctly refer to Policy P2c as Land at Hatton Fields, not Airport Business Park.</p> <p>No change is proposed to the specified floorspace of 63,450sqm. The site allocations are expressed as minimum development quantum, and subject to suitable design solutions, a case may be put forward at planning application stage for exceeding the mdq figure.</p>
		Environment Agency	<p><u>Historic landfill</u> Land at Hatton Fields is on three historic landfills.</p> <ul style="list-style-type: none"> - Hatton Farm 1. Accepted inert waste between July 1983 to December 1986. The site was licensed. The historic landfill database shows that gas control is in place. 	<p>Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing</p>

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			<ul style="list-style-type: none"> - Hatton Farm 2. Accepted inert waste between March 1984 to April 1994. The site was licensed. The historic landfill database shows that gas control is in place. - British Maritime Technology. Inert, industrial, commercial and household waste deposited. Including the waste comments clay, sand, gravel, brick, ash and wood. The site was unlicensed. <p>Please refer to our comments on development on or near historic landfills on pages 19-22 (within REP106 of Document S9 - Link to Representations made pursuant to Regulation 20 (in response to consultation at Regulation 19 Stage)).</p> <p><u>Proximity to a Main River</u> Land at Hatton Fields is in proximity to the Duke of Northumberland, a designated Main River at the southern edge of the site boundary. A minimum 8m riparian/buffer zone must remain. Any work within 8m may require a FRAP.</p>	advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.
		Sue Chinnery	Objection to the loss of the horse paddock on the SINC within the Land at Hatton Fields allocation.	Comment noted. The Council considers that exceptional circumstances are demonstrated for releasing some of the land at Hatton Fields for development to help alleviate the borough's significant shortfall of industrial land. The plan would protect existing open spaces including the horse paddock at the south of the site, and the SINC.
		Shalu Gupta	Objection to the release of Green Belt land, on the ground of: insufficient scrutiny of existing/brownfield sites to meet need; impact on character of the area;	Comment noted. It is critical for the plan to optimise land to help reduce the significant shortfall of industrial

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			<p>loss of open space; loss of biodiversity; air quality impact; loss of horse paddocks; increase in traffic including around local schools.</p>	<p>floorspace requirements. In this case, it considers that exceptional circumstances are demonstrated for releasing some of the land for development.</p> <p>It should be noted that the area of the site to be released from the Green Belt is currently private land and therefore not publicly accessible. The area of release is also not subject to any ecological designations. The remaining larger area of the site allocation is not proposed to be released from the Green Belt. The plan would protect existing open spaces in the part of the site not released from the Green Belt and would require the provision of a community nature zone and biodiversity enhancements at the wider site - these would be critical pieces of green infrastructure.</p> <p>The Council has fully explored the potential for using existing sites for additional industrial development and brought forward allocations where appropriate.</p> <p>While some representors have highlighted opportunities on existing sites through vacancies or under-utilised land beyond these identified allocations, the Council notes that</p>

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				<p>most of these opportunities are either outside of the borough, not available or not suitable for allocation for industrial land. The very low vacancy rate of industrial land in the borough is highlighted in the evidence base and is one of the factors indicating that there is a very significant requirement for additional industrial land, which the plan is bringing forward.</p> <p>Through the Duty to Co-operate, the Council has engaged extensively with neighbouring boroughs that have confirmed that there is no scope for them to help meet Hounslow's need for employment land.</p>
		Peter Harmes	<p>Objection to release of Green Belt land for development. Objection on grounds of: insufficient scrutiny of existing industrial estates; loss of vital green lung; impact on wildlife; non-compliance with policy on clean air and green spaces; non-compliance with Duty to Co-operate due to insufficient examination of space near to Heathrow.</p>	<p>Comment noted. It is critical for the plan to optimise land to help reduce the significant shortfall of industrial floorspace requirements. In this case, it considers that exceptional circumstances are demonstrated for releasing some of the land for development. It should be noted that the area of the site to be released from the Green Belt is currently private land and therefore not publicly accessible. The area of release is also not subject to any ecological designations. The remaining larger area of the site allocation is not proposed to be released from the Green Belt. The plan would protect existing open spaces in the part of the site not released from the Green Belt and</p>

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				<p>would require the provision of a community nature zone and biodiversity enhancements at the wider site - these would be critical pieces of green infrastructure.</p> <p>The Council has fully explored the potential for using existing sites for additional industrial development and brought forward allocations where appropriate.</p> <p>While some representors have highlighted opportunities on existing sites through vacancies or under-utilised land beyond these identified allocations, the Council notes that most of these opportunities are either outside of the borough, not available or not suitable for allocation for industrial land. The very low vacancy rate of industrial land in the borough is highlighted in the evidence base and is one of the factors indicating that there is a very significant requirement for additional industrial land, which the plan is bringing forward.</p> <p>Through the Duty to Co-operate, the Council has engaged extensively with neighbouring boroughs that have confirmed that there is no scope for them to help meet Hounslow's need for employment land.</p>

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		Sarah Houghton	<p>Objection to release of land from the Green Belt for development, on the grounds of impact on bat species and lack of need for warehousing development.</p>	<p>Comment noted. It is critical for the plan to optimise land to help reduce the significant shortfall of industrial floorspace requirements, which has been highlighted by the evidence base (the Employment Land Review EBED1), in particular in relation to warehousing development serving the logistics industry. In this case, it considers that exceptional circumstances are demonstrated for releasing some of the land for development. It should be noted that the area of the site to be released from the Green Belt is currently private land and therefore not publicly accessible. The area of release for development is also not subject to any ecological designations. The remaining larger area of the site allocation is not proposed to be released from the Green Belt. The plan would protect existing open spaces in the part of the site not released from the Green Belt and would require the provision of a community nature zone and biodiversity enhancements at the wider site (including to the Hatton Meadows SINC) - these would be critical elements of green infrastructure, while any development proposals would be required to carry out ecological surveys relating to bats or any other protected species (as per Policy GB7).</p>

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		Naomi Landy	Objection to release of Green Belt land at Hatton Fields for development. Objection on the grounds that: brownfield sites and regeneration areas have not been properly utilised; the local plan contradicts the UK Biodiversity Plan and other national policies on climate change and the ecological crisis; the plan goes against the clean air strategy and Hounslow nature recovery action plan; no evidence of need to develop on Hatton Fields.	Comment noted. It is critical for the plan to optimise land to help reduce the significant shortfall of industrial floorspace requirements, which has been highlighted in the evidence base (the Employment Land Review). In this case, it considers that exceptional circumstances are demonstrated for releasing some of the land for development. It should be noted that the area of the site to be released from the Green Belt is currently private land and therefore not publicly accessible. The area of release is also not subject to any ecological designations. The remaining larger area of the site allocation is not proposed to be released from the Green Belt. The plan would protect existing open spaces in the part of the site not released from the Green Belt and would require the provision of a community nature zone and biodiversity enhancements at the wider site - these would be critical pieces of green infrastructure. The Council has fully explored the potential for using existing sites for additional industrial development and brought forward allocations where appropriate.
		Clare Long	Objection to proposed Green Belt release citing existing sites being available.	Comments noted. The Council considers that exceptional circumstances are demonstrated for the proposed Green Belt releases, including the significant shortfall in the borough's ability to meet its

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				employment land requirements if these sites were not allocated. The plan preparation process has assessed the scope for existing sites to contribute towards meeting the need and site allocations have been brought forward on such sites where they are considered to be suitable and deliverable.
		Clare Searle	Objection to proposed Green Belt releases.	Comments noted. The Council considers that exceptional circumstances are demonstrated for the proposed Green Belt releases, including the significant shortfall in the borough's ability to meet its employment land requirements if these sites were not allocated. It should be noted that the area of the site to be released from the Green Belt is currently private land and therefore not publicly accessible. The area of release is also not subject to any ecological designations. The remaining larger area of the site allocation is not proposed to be released from the Green Belt. The plan would protect existing open spaces in the part of the site not released from the Green Belt and would require the provision of a community nature zone and biodiversity enhancements at the wider site - these would be critical pieces of green infrastructure.
		Friends of Hatton Fields	Objection to proposed release of Green Belt land for development. Objection on the grounds of: availability of brownfield sites for warehousing (accompanied by	Comment noted. It is critical for the plan to optimise land to help reduce the significant shortfall of industrial floorspace

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			<p>appendices detailing available industrial units in the wider area and regeneration opportunities); insufficient work collaborating with neighbouring authorities to avoid Green Belt release; focus should be on creating high skilled and higher paid jobs with much higher aspirations for our young people; increasing automation of the logistics industry; damage to the unique semi-rural characteristics of the area; impact on horse stables; loss of separation (the fields allocated for development separate Heathrow airport from the North Feltham Industrial Estate); air pollution; impact on green strategy; loss of green lung; noise, flooding and traffic impact; health; climate policies; loss of biodiversity (backed up by habitats survey which recommends protecting the site); loss of recreation and open space.</p>	<p>requirements, and reflects the typology of industrial development required in this area. In a selective number of cases, it considers that exceptional circumstances are demonstrated for releasing some land for development. It should be noted that the area of the site to be released from the Green Belt is currently private land and therefore not publicly accessible, so there would be no impact on recreational activities. The area of release is also not subject to any ecological designations. The remaining larger area of the site allocation is not proposed to be released from the Green Belt. The plan would protect existing open spaces in the part of the site not released from the Green Belt and would require the provision of a community nature zone and biodiversity enhancements at the wider site - these would be critical pieces of green infrastructure. It would also require compensatory improvements to existing Green Belt land.</p> <p>The Council has fully explored the potential for using existing sites for additional industrial development and brought forward allocations where appropriate.</p> <p>While some representors have highlighted opportunities on existing sites through vacancies or under-utilised land beyond these identified allocations, the Council notes that</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>most of these opportunities are either outside of the borough, not available or not suitable for allocation for industrial land. The very low vacancy rate of industrial land in the borough is highlighted in the evidence base and is one of the factors indicating that there is a very significant requirement for additional industrial land, which the plan is bringing forward.</p> <p>Through the Duty to Co-operate, the Council has engaged extensively with neighbouring boroughs that have confirmed that there is no scope for them to help meet Hounslow's need for employment land.</p>
		Sabrina Saif	<p>Objection to release of Green Belt land for development.</p>	<p>Comments noted. The Council considers that exceptional circumstances are demonstrated for the proposed Green Belt releases, including the significant shortfall in the borough's ability to meet its employment land requirements if these sites were not allocated.</p>
		Brentford Voice	<p>Objection to proposed Green Belt releases. Representor considers that exceptional circumstances have not been demonstrated to justify releases.</p>	<p>Comments noted. The Council considers that exceptional circumstances are demonstrated for the proposed Green Belt releases, including the significant shortfall in the borough's ability to meet its employment land requirements if these sites were not allocated.</p>
		Energy Garden	<p>Objection to release of Green Belt land for development. Objection on the grounds of: non-compliance with the 2021 London Plan; no exceptional</p>	<p>Comment noted. It is critical for the plan to optimise land to help reduce the significant shortfall of industrial floorspace</p>

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			<p>circumstances for release; non-compliance with Duty to Co-operate due to insufficient interaction with local stakeholders; impact on biodiversity.</p>	<p>requirements. In a selective number of cases, it considers that exceptional circumstances are demonstrated for releasing some land for development (therefore in compliance with the 2021 London Plan ADP1⁵³). The plan would protect existing open spaces and would require the provision of a community nature zone and biodiversity enhancements at the Hatton Fields site - these would be critical pieces of green infrastructure. It would also require compensatory improvements to existing Green Belt land.</p> <p>The Council has fully explored the potential for using existing sites for additional industrial development and brought forward allocations where appropriate.</p> <p>While some representors have highlighted opportunities on existing sites through vacancies or under-utilised land beyond these identified allocations, the Council notes that most of these opportunities are either outside of the borough, not available or not suitable for allocation for industrial land. The very low vacancy rate of industrial land in the borough is highlighted in the evidence base and is</p>

⁵³ [ADP1 – London Plan \(2021\)](#)

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				<p>one of the factors indicating that there is a very significant requirement for additional industrial land, which the plan is bringing forward.</p> <p>Through the Duty to Co-operate, the Council has engaged extensively with neighbouring boroughs that have confirmed that there is no scope for them to help meet Hounslow's need for employment land.</p>
		<p>Trish Basquille</p>	<p>Objection to release of Green Belt land for development. Objection on the ground of: insufficient scrutiny of existing industrial units and brownfield sites; conflict with green add blue infrastructure strategies; conflict with national policy on clean air and climate crisis; as part of the Duty to Co-operate, opportunities should be explored for existing brownfield sites in Hounslow and surrounding boroughs, e.g. vacant industrial units and Heathrow's open air car parks.</p>	<p>Comment noted. It is critical for the plan to optimise land to help reduce the significant shortfall of industrial floorspace requirements. In this case, it considers that exceptional circumstances are demonstrated for releasing some of the land for development. It should be noted that the area of the site to be released from the Green Belt is currently private land and therefore not publicly accessible. The area of release is also not subject to any ecological designations. The remaining larger area of the site allocation is not proposed to be released from the Green Belt. The plan would protect existing open spaces in the part of the site not released from the Green Belt and would require the provision of a community nature zone and biodiversity enhancements at the wider site - these would be critical pieces of green infrastructure.</p>

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				<p>The Council has fully explored the potential for using existing sites for additional industrial development and brought forward allocations where appropriate.</p> <p>While some representors have highlighted opportunities on existing sites through vacancies or under-utilised land beyond these identified allocations, the Council notes that most of these opportunities are either outside of the borough, not available or not suitable for allocation for industrial land. The very low vacancy rate of industrial land in the borough is highlighted in the evidence base and is one of the factors indicating that there is a very significant requirement for additional industrial land, which the plan is bringing forward.</p> <p>Through the Duty to Co-operate, the Council has engaged extensively with neighbouring boroughs that have confirmed that there is no scope for them to help meet Hounslow's need for employment land.</p>
		West Chiswick and Gunnersbury Society	<p>Objection to release of Green Belt land for development at Hatton Fields. Objection on the grounds of: no exceptional circumstances demonstrated; land meets Green Belt purposes; not compliant with London Plan;</p>	<p>Comment noted. It is critical for the plan to optimise land to help reduce the significant shortfall of industrial floorspace requirements. In this case, it considers</p>

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			<p>compromises council's ability to meet other objectives and comply with other policies including on green and blue infrastructure and environmental quality; loss of green space; loss of land to held protect against flooding and urban heat island effect; economic benefits of development would be low and quality and quantity; increase in road traffic; site's constraints mean development would not be compatible with the council's drive for industrial intensification.</p>	<p>that exceptional circumstances are demonstrated for releasing some of the land for development. As set out in the plan, the Council supports industrial intensification but the evidence base shows that the scope for this is not sufficient to meet the identified development requirements. The plan would protect existing open spaces and would require the provision of a community nature zone and biodiversity enhancements at the wider site - these would be critical pieces of green infrastructure.</p>
		<p>Joshua Pinto</p>	<p>Objection to the release of Green Belt land for development. Objection on the grounds of: insufficient scrutiny of existing sites and opportunities around Heathrow; conflict with UK Biodiversity Plan and other national climate crisis and clean air policies and with the nature recovery action plan; plan not compliant with the Duty to Co-operate as there are opportunities to develop brownfield sites and utilise Heathrow's extensive open-air car parks before releasing Green Belt land</p>	<p>Comment noted. It is critical for the plan to optimise land to help reduce the significant shortfall of industrial floorspace requirements. In this case, it considers that exceptional circumstances are demonstrated for releasing some of the land for development. It should be noted that the area of the site to be released from the Green Belt is currently private land and therefore not publicly accessible. The area of release is also not subject to any ecological designations. The remaining larger area of the site allocation is not proposed to be released from the Green Belt. The plan would protect existing open spaces in the part of the site not released from the Green Belt and would require the provision of a community nature zone and biodiversity</p>

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				<p>enhancements at the wider site - these would be critical pieces of green infrastructure.</p> <p>The Council has fully explored the potential for using existing sites for additional industrial development and brought forward allocations where appropriate.</p> <p>While some representors have highlighted opportunities on existing sites through vacancies or under-utilised land beyond these identified allocations, the Council notes that most of these opportunities are either outside of the borough, not available or not suitable for allocation for industrial land. The very low vacancy rate of industrial land in the borough is highlighted in the evidence base and is one of the factors indicating that there is a very significant requirement for additional industrial land, which the plan is bringing forward.</p> <p>Through the Duty to Co-operate, the Council has engaged extensively with neighbouring boroughs that have confirmed that there is no scope for them to help meet Hounslow's need for employment land.</p>

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		Rin Roche	Objection to release of land from the Green Belt for new development, including at Hatton Fields. Concern over aspects of new development, including: excessive building heights; appearance of new developments and impact on area character; lack of green elements in new development; new developments too dense; not enough trees in new development.	Comments noted. The Council considers that exceptional circumstances are demonstrated for the proposed Green Belt releases, including the significant shortfall in the borough's ability to meet its employment land requirements if these sites were not allocated. Comments regarding character of new development are noted- the Council's policies promote high quality, development.
		Hounslow Green Party	Objection to the release of Green Belt land for industrial use. Objection on various grounds, including: increase in aviation is not compatible with climate change targets; no exceptional circumstances for release demonstrated; job targets should be lower; plot ratios of employment developments should be higher, including multi-storey buildings; disagree with stock vacancy adjustment used in calculating need; perimeter car parks at the perimeter of Heathrow Airport could be used instead and this should be explored through the Duty to Co-operate.	<p>Comment noted. It is critical for the plan to optimise land to help reduce the significant shortfall of industrial floorspace requirements. In this case, it considers that exceptional circumstances are demonstrated for releasing some of the land for development. The plan would protect existing open spaces and would require the provision of a community nature zone and biodiversity enhancements at the wider site - these would be critical pieces of green infrastructure.</p> <p>The Council has fully explored the potential for using existing sites for additional industrial development and brought forward allocations where appropriate.</p> <p>While some representors have highlighted opportunities on existing sites through vacancies or under-</p>

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				<p>utilised land beyond these identified allocations, the Council notes that most of these opportunities are either outside of the borough, not available or not suitable for allocation for industrial land. The very low vacancy rate of industrial land in the borough is highlighted in the evidence base and is one of the factors indicating that there is a very significant requirement for additional industrial land, which the plan is bringing forward.</p> <p>Through the Duty to Co-operate, the Council has engaged extensively with neighbouring boroughs that have confirmed that there is no scope for them to help meet Hounslow's need for employment land.</p> <p>The Council considers that the approach to calculating employment floorspace need is robust, including the use of a stock vacancy adjustment. The plan encourages industrial intensification and higher plot ratios, and multi-storey units in new industrial developments (subject to height constraints imposed due to the proximity of Heathrow air traffic control equipment).</p>
		<p>Sport England</p>	<p>Sport England (SE) note that improved access to sports facilities and enhanced playing field (and sports pitches) are included in Allocation 57 "Land at Hatton Fields", however SE suggest that an area within the red-</p>	<p>Comments noted. The area SE have indicated within their representation is land designated as a Site of Importance for Nature Conservation (SINC) of Borough</p>

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			line boundary shows a loss of playing pitches/field to a nature zone in the southwest of the site allocation. SE state that aerial imagery has this area marked as playing pitches in 2022 and as such this should be removed from the proposed nature zone and ensure the playing field should be protected or replaced.	Importance Grade 1, known as HoBI18 Hatton Meadows. This part of the site is therefore a designated local nature site and should not be considered as a playing field. No further modifications are considered necessary.
59	Tesco Feltham	No representation received at Regulation 19	No representation received at Regulation 19	No representation received at Regulation 19
61	Council Depot, Ashmead Road	REP106 Environment Agency redacted.pdf	<u>Historic landfill</u> The Council Depot on Ashmead Road is next to the 'Bedfont Lane – Sandy Lane' historic landfill. The historic landfill database indicates waste was deposited between 1912 and 1931. The database indicates that inert waste was deposited and included the waste comments silt, ash, glass and brick. The site was unlicensed. Please refer to our comments on development on or near historic landfills on pages 19-22 (within REP106 of Document S9 - Link to Representations made pursuant to Regulation 20 (in response to consultation at Regulation 19 Stage)).	Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.
62	Manor Park, Feltham	No representation received at Regulation 19	No representation received at Regulation 19	No representation received at Regulation 19
63	80-86 High Street Feltham	No representation received at Regulation 19	No representation received at Regulation 19	No representation received at Regulation 19
64	MOD Feltham	REP096 Ministry of Defence redacted.pdf	Given that a school has recently been permitted on the site, it is requested that school places are removed for the allocation requirements. It is argued that the main site access should be from Elmwood Avenue, as the proposed access is not within the gift of the landowner.	Comments with regard to the permission granted for the REACH Academy school are noted, however, it is not considered necessary to annotate the site allocation redline map to show the location of the permitted school. The redline allocation

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			<p>The DIO requests confirmation that the sports provision could be partially shared with the sports provision provided as part of the school, while DIO intend to make every effort to resupply sports provision on site, this may not be possible and it may be more appropriate to provide a contribution to enhance sports provisions as Hanworth Air Park.</p>	<p>map is provided for site identification purposes and to clearly define the site boundary. The Council will however include a suggested modification in Document EX57 (ref EiP_SA64_01) which proposes to add a footnote to Site Allocation 64 explaining that the proposed school included in the site allocation boundary has received planning permission and, as of April 2026, that area of the site is in demolition stage ahead of its delivery.</p> <p>Movement and access requirements are considered appropriate for the proposed allocation, and necessary to ensure suitable bus, pedestrian and cyclist access to the site.</p> <p>In respect of sports provision, in the instance that the existing sports pitches are found to be publicly accessible it would generally be expected that the pitches were provided elsewhere on-site or as a last resort a mixture of on-site and off-site provision of the same quantity/quality, and would continue to be fully accessible to the public.</p>
		<p>REP058 CPRE_redacted.pdf</p>	<p>The open space and sports pitches should be retained in their entirety.</p>	<p>Site 64 requires provision of a new publicly accessible open space within the new development.</p>

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				<p>The Planning Designations section states, “Playing Pitches: Site contains playing pitches. Development must retain and enhance playing fields and sports pitches.” Subject to them being in public use, the playing pitches must therefore, as a minimum, be replaced.</p>
		<p>REP077 TfL_redacted.pdf</p>	<p>We support the following requirement if it is amended as shown [below]: ‘The layout should support the creation of legible streets, which follow the Healthy Streets approach, minimise the impacts of traffic generation on the surrounding streets, do not provide thorough routes across the site for vehicles (apart from buses), and enhance wayfinding and the overall character of the urban form and which will allow the future extension of bus routes into the site.’ Roads designed to be used by buses will need to conform to relevant TfL guidance and discussions should take place with TfL at an early stage in masterplanning to ensure that the design of the site provides appropriate through routes for buses and suitable standing space within the site so that public transport and active travel connectivity is optimised. An additional requirement should make it clear that contributions will be required towards bus capacity and infrastructure to cater for increased demand and any additional costs incurred in serving the site.</p>	<p>Comments noted. Whereas the proposed modification does not address either soundness or legality, it is considered that the proposed additional text will help in giving further clarity to the Site Allocation. As such, wording will be suggested as a proposed minor modification. The following modification is proposed to the Movement and Access section:</p> <p>‘The layout should support the creation of legible streets, which follow the Healthy Streets approach, minimise the impacts of traffic generation on the surrounding streets, do not provide thorough routes across the site for vehicles (apart from buses), and enhance wayfinding and the overall character of the urban form and which will allow the future extension of bus routes into the site.’ (EX57: HLP_SA_64_01)</p> <p>This has been agreed between both parties in the SoCG (Document EX5a).</p>

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		REP106 Environment Agency_redacted.pdf	<u>Previous contaminating land use (military use)</u> The extensive history of this site for military use presents a high risk of contamination. This site will require detailed intrusive investigation to characterise any soil and groundwater contamination on site, and any development scheme will be required to fully establish the risks to controlled waters. We would recommend the developer of this site to engage with the Environment Agency's Pre-Application Planning Advice Service in order to discuss requirements for the development of this site.	Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.
		REP109 Sport England_redacted.pdf	The loss of the playing field - whether it is private or public - on site would be contrary to NPPF and Sport England's Playing Field Policy and should be protected or replaced to be sound	The Planning Designations section states, "Playing Pitches: Site contains playing pitches. Development must retain and enhance playing fields and sports pitches." Subject to them being in public use, the playing pitches must therefore, as a minimum, be replaced.
65	Leisure West	REP106 Environment Agency_redacted.pdf	<u>Proximity to a Main River</u> Land at 2 High Street, Feltham is in proximity to the River Longford, a designated Main River. A minimum 8m riparian/buffer zone must be provided. Any work within 8m will also require a FRAP.	Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.
		REP041 Universities Superannuation Scheme Limited CO Agent_redacted.pdf	Universities Superannuation Scheme Limited (USS) supports the overarching vision within the Local Plan for promoting intensification of uses and efficient use of land in appropriate locations adjacent to the town centre that are well connected. USS furthermore	The site is identified as appropriate for tall buildings in Policy CC3 and the Tall Buildings Study, which uses the Feltham Masterplan as a starting point for looking at building height. The Policy states that

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			<p>supports the allocation of their site for mixed use redevelopment (site allocation 65). USS does, however, strongly recommend that LBH reconsider the proposed heights and the number of homes that could be delivered on site which should be increased and review the intended land uses at the site in order to ensure that there is the required flexibility in place to enable this site to come forward for redevelopment and actually be delivered. This will allow for the optimal level of redevelopment in terms of making an efficient use of this strategic site in the near future to accord with the growth of Feltham and the rest of the borough, ensuring the Local Plan is sound.</p>	<p>the appropriate height on site is up to 22.4m/7 stories on the southern end of the site. This recognises a number of promoting factors to tall buildings, which is that it is in a transform area, and within the opportunity area, however also recognises its context and sensitivities in that it is adjacent to low scale residential areas.</p> <p>Nevertheless, although this site isn't considered appropriate in Policy CC3, this does not mean that developers cannot put forward an application for tall buildings outside of the appropriate areas identified. The High Court judgment in London Borough of Hillingdon, R (On The Application Of) v Mayor of London clarified how London Plan (ADP1) Policy D9 on tall buildings should be interpreted. The crucial point from the judgment is that Parts A and B are not gateways that must be satisfied before Part C can be used. In other words, while boroughs must define heights and identify suitable locations, the impact-based criteria in Part C still apply independently. This prevents an overly rigid interpretation that would automatically block tall buildings outside mapped zones. As such, modifications are proposed to Policy CC3 align more closely with the expectations of London Plan Policy D9, namely referring to the fact that</p>

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				<p>tall buildings may be appropriate in the appropriate locations as opposed to being required to be in the appropriate locations and appropriate heights rather than maximum heights.</p> <p>As per discussions at Stage 1 Hearing sessions, the MDQs remain as they are described – a minimum, and are not a ceiling on capacity subject to site constraints and other planning considerations.</p>
		REP042 Universities Superannuation Scheme Limited CO Agent redacted.pdf	<p>The proposed use classes for allocation 65 - Leisure West should be expanded to include Sui Generis, E(c) (i), (ii), (iii), hotel uses.</p> <p>The heights should be increased to 10 storeys and the quantum of housing should be increased.</p> <p>The figure of 11,640sqm for community/health uses is questioned. It appears this figure comes from the Feltham Masterplan but that figure includes Feltham East. USS considers that this figure is too high for allocation 65 alone and note that it is not reflected in Place Policy 2(b). USS are happy to integrate community and health uses but feel that this figure is unjustified.</p>	<p>The site is identified as appropriate for tall buildings in Policy CC3 and the Tall Buildings Study, which uses the Feltham Masterplan as a starting point for looking at building height. The Policy states that the appropriate height on site is up to 22.4m/7 stories on the southern end of the site. This recognises a number of promoting factors to tall buildings, which is that it is in a transform area, and within the opportunity area, however also recognises its context and sensitivities in that it is adjacent to low scale residential areas.</p> <p>Nevertheless, although this site isn't considered appropriate in Policy CC3, this does not mean that developers cannot put forward an application for tall buildings outside of the appropriate areas identified. The High Court judgment in London</p>

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				<p>Borough of Hillingdon, R (On The Application Of) v Mayor of London) clarified how London Plan (ADP1) Policy D9 on tall buildings should be interpreted. The crucial point from the judgment is that Parts A and B are not gateways that must be satisfied before Part C can be used. In other words, while boroughs must define heights and identify suitable locations, the impact-based criteria in Part C still apply independently. This prevents an overly rigid interpretation that would automatically block tall buildings outside mapped zones. As such, modifications are proposed to Policy CC3 align more closely with the expectations of London Plan Policy D9, namely referring to the fact that tall buildings may be appropriate in the appropriate locations as opposed to being required to be in the appropriate locations and appropriate heights rather than maximum heights.</p> <p>As per discussions at Stage 1 Hearing sessions, the MDQs remain as they are described – a minimum, and are not a ceiling on capacity subject to site constraints and other planning considerations.</p>
67	UPS House	REP074 The Mayor of London (GLA)_redacted.pdf	<p>The site is home to non-designated industrial uses and as such Policy E7C of the LP2021 should be followed. The inclusion of a reference to Policy E7C of the London Plan would be welcomed. Existing industrial capacity</p>	<p>LBH propose a modification to include the following in the site requirements:</p>

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			on the site should be considered as part of a plan led approach towards meeting the borough's industrial needs over the Plan period.	The site is home to non-designated industrial uses and as such, London Plan (2021) Policy E7 (Industrial intensification, co-location and substitution) Part C should be followed. (EX57: HLP_SA67_01)
		REP077 TfL_redacted.pdf	We note the following requirement that: 'Appropriately designed vehicular access to the site should be from Forest Road, with an additional arm from the Browells Lane/Forest Road roundabout investigated, together with the potential for providing bus access through the site to the MOD Site.' Roads designed to be used by buses will need to conform to relevant TfL guidance and discussions should take place with TfL at an early stage in masterplanning to ensure that bus access through the site is appropriate and feasible and if so that the design of the site provides appropriate through routes for buses and suitable standing space within the site so that public transport and active travel connectivity is optimised.	The Council have provided detailed responses to each of these, through the SoCG process and also in the Modifications Table in document S11, where they are agreed with. A SoCG with TfL has also been signed and was presented to the inspectors during the Stage 1 Hearings (Document EX5a).
69	Land at 2 High Street Feltham	REP031 Flodrive Investment Limited_redacted.pdf	Flodrive Investment Ltd disagree with the appropriate heights identified for the site in Policy CC3 and Tall Building Study. Flodrive Investment Ltd also suggest a number of modifications to site allocation ref 69, including a mdq for co-living housing, references to the site being suitable for a building of up to 14 storeys, and for the allocation to state the site contains 2 parcels in separate ownership.	Comments noted. No changes proposed. The allocation has regard to landowner availability. The site containing both Sue Ryder and neighbouring McDonalds was identified in the Feltham Masterplan (EX1.72⁵⁴) and considered in the Site Allocations and Capacity Assessment (2024) (EBSC2) which concluded the site was suitable, available and achievable for development and met allocation requirements. It is therefore not

⁵⁴ [EX1.72 – Feltham Masterplan \(2017\)](#)

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				<p>considered appropriate that separate information is included for separate titles in allocation ref 69.</p> <p>The site is not identified as appropriate for tall buildings in the Tall Buildings Study, which uses the Feltham Masterplan as a starting point for looking at building height. The masterplan considers the appropriate height on the site to be between up to 4 and up to 6 storeys. This does not fit within the definition of a tall building within Hounslow. Section 6.2 of the masterplan explains that heights of up to 6 storeys are acceptable around Feltham Station, where they help to optimise density in a highly accessible location. This section also explains the rationale for the building heights in the Masterplan, which is that they need to be of a decreased height where they interface with existing lower rise development context and other sensitive areas, must adequately respond to the context of the Conservation Area, and must not encroach into and detract from St. Catherine's Spire. The Masterplan applies the opportunities set out in the Feltham Green and Town Centre Conservation Area Appraisal, namely the need to ensure new development respects the density, scale, design, details, materials and character of the conservation area and the opportunity to</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>improve the public realm and setting at St. Catherine's Tower, the Green and Feltham Railway Station. As a result of these considerations, the site is not considered appropriate for tall buildings.</p> <p>Nevertheless, although this site isn't considered appropriate in Policy CC3, this does not mean that developers cannot put forward an application for tall buildings outside of the appropriate areas identified. The High Court judgment in London Borough of Hillingdon, R (On The Application Of) v Mayor of London) clarified how London Plan Policy D9 on tall buildings should be interpreted. The crucial point from the judgment is that Parts A and B are not gateways that must be satisfied before Part C can be used. In other words, while boroughs must define heights and identify suitable locations, the impact-based criteria in Part C still apply independently. This prevents an overly rigid interpretation that would automatically block tall buildings outside mapped zones. As such, modifications are proposed to Policy CC3 align more closely with the expectations of London Plan Policy D9, namely referring to the fact that tall buildings may be appropriate in the appropriate locations as opposed to being required to be in the appropriate locations</p>

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				<p>and appropriate heights rather than maximum heights.</p> <p>Any increase to the site's minimum development quantum (such as to include co-living in addition to 90 residential homes) would mean the allocation is not consistent with the masterplan. As per discussions at Stage 1 Hearing sessions, the MDQs remain as they are described – a minimum, and are not a ceiling on capacity subject to site constraints and other planning considerations. Comments regarding the mdq for residential development are noted, though 'residential' is considered a suitably broad term that could include Build to Rent, or certain types of specialist housing. No changes are therefore proposed.</p>
70	Royal Naval Association Club	No representation received at Regulation 19	No representation received at Regulation 19	No representation received at Regulation 19
72	St. Catherine's House and Car Park	REP106 Environment Agency redacted.pdf	<p><u>Proximity to a Main River</u></p> <p>St Catherine's House and Car Park is in proximity to the River Longford, a designated Main River. A minimum 8m riparian/buffer zone must be provided. Any work within 8m will also require a FRAP.</p>	Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
73	Land at Nene Gardens	REP058 CPRE_redacted.pdf	This site should be retained as a green space and used for nature recovery and as public open space.	The site is an overgrown area of waste ground (former tennis court and community building) which has been derelict for c.20 years. The site is considered to be surplus to requirements as open space and has been found to be available for allocation to help meet housing needs.
74	Hounslow West Station	Places for London	<p>1) Places for London states that Figure CC3.1 should show Hounslow West Station Car Park as suitable for tall buildings - they argue that this is in line with the Tall Buildings Study and the draft policy text. It is considered that, due to the site constraints, it is impossible to bring forward the 360 units mdq in the Allocation with a building lower than 12 storeys (and notes that a planning application which was supported by Hounslow's planning committee in 2022 proposed a tall building cluster of up to 12 storeys). It is requested that Policy CC3 and Figure CC3.1 and Figure CC3.5 be amended to reference a tall building with a height of 12 storeys at this location.</p> <p>2) Places for London suggest that the paragraph referencing the CC3 and Tall Buildings Study be removed, and a policy reference to Policy CC4 and the NPPF added.</p> <p>Policy CC3 and the Tall Buildings Study state that the site is appropriate for buildings up to 11 storeys. This should be reflected in the allocation, given the constrained nature of the</p>	<p>1) The planning application referred to is not being implemented. Therefore the position in the Tall Building Study remains a key consideration.. The Council considers that this study provides a robust framework for assessing such proposals and does not consider any changes are required on the indicated building heights for this allocation.</p> <p>2) No change proposed. A consistent approach has been taken to site allocations and it is considered appropriate for detail to be included regarding the heritage assets and designations that are in the vicinity of the site, as well as reference to Policy CC3 which sets out appropriate heights for the site and the Tall Buildings Study (EBCC3⁵⁵) which forms part of the evidence base for the Plan</p>

⁵⁵ [EBCC3 – Tall Buildings Study](#)

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>site tall buildings will be required to deliver the 360 units that are the minimum quantum. As such, the allocation and policy CC3 should state that 12 storeys is appropriate in this location.</p> <p>Reference to providing short term parking does not comply with London Plan Policy T6 and should be removed as it is unsound.</p> <p>Places for London argue that feasibility studies have shown that step-free access is achievable without the development of the site.</p> <p>Therefore they request that the reference to providing step-free access be removed from the allocation and that wording be changed to say that development should make a financial contribution towards step-free access.</p>	<p>and in particular, Policy CC3. The requirement for step-free access at the station should be retained to ensure its delivery. A Whole Plan Viability Assessment (EBV1) has been undertaken which sound that the policies and proposed allocations in the Plan were viably deliverable.</p> <p>With regard to parking at the site, a suggested modification is proposed which removes the reference to short-term car parking provision in allocation ref 74.</p>
		<p>TfL</p>	<p>The site requirements should be amended [...] to delete the reference to short-term car parking provision because the site has a PTAL of up to 5 and a requirement for car parking to serve a local centre in this location would not be consistent with the London Plan. '<u>Well-considered redevelopment of the site to create a mixed-use retail, leisure and residential development, and E((d-f)/F1/F2(c-d)) and appropriate level of short term car parking provision to serve the station and local centre.</u>'</p> <p>The site includes off-highway bus stops, bus standing and turnaround facility. These bus facilities will need to be retained or re-provided as part of any redevelopment.</p> <p>We note that 'To ensure the safe operation of the railway, an appropriate level of TfL / LUL staff car</p>	<p>Comments noted. Whereas the proposed modification does not address either soundness or legality, it is considered that the proposed additional text will help in giving further clarity to the Site Allocation. As such, wording will be suggested as a proposed minor modification.</p> <p>The following modification is proposed, as agreed in EX5a:</p> <p><u>Well-considered redevelopment of the site to create a mixed-use retail, leisure and residential development, and E((d-f)/F1/F2(c-d)) and appropriate level of</u></p>

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			parking spaces may be provided.' We recognise that there may be justification for operational parking at this site. As set out in the definition of operational parking in the London Plan glossary, this does not include parking for personal travel such as commuting.	short term car parking provision to serve the station and local centre. (EX57: HLP_SA71_01)
75	Land to the rear of HCC Sports and Social Club	National Grid	Modification requested to allocation: <u>The development will include a strategy for responding to the NGET Underground Cable Routes present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."</u>	Comments noted. Guidance regarding National Grid Electricity Transmission assets and how to ensure development does not adversely impact on essential infrastructure is welcomed. National Grid have been consulted throughout the preparation of the Local Plan to ensure that the proposed site allocations would not compromise operation of the electricity network. At planning application stage, development proposals will be required to demonstrate that their design has regard to the NGET Design Guide and Principles. It is therefore not considered that any modifications are required to be made to the site allocations referred to in this representation.
		Sport England	the sport facilities are disused and in are bad condition but the proposed loss has not been justified in terms of surplus to current and future sport facility needs, contrary to Paragraph 103 of the NPPF and Sport England Planning Policy	It should be noted that the land was identified as surplus to requirements in the Open Space Assessment (2018) (EBGB7). As mentioned, the facilities are disused, and the planning benefits of delivering housing outweigh their retention, given the facility is no longer usable.
76	Lampton House	No representation received at Regulation 19	No representation received at Regulation 19	No representation received at Regulation 19

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
77	Land South of Western International Market	FORCE	FORCE provide details of their organisational background and focus. FORCE attended the examination of the withdrawn GWC and WoB plan reviews in November 2021 and raised strong opposition to the proposed treatment of Green Belt. FORCE welcome the scaling back of the land proposed to be removed from the Green Belt in the current Reg 19 draft Local Plan but are disappointed as a very significant quantum of open space is proposed to be allocated for development and this is not justified by sufficient evidence. FORCE strongly object to Site Allocations: 57 Land at Hatton Fields; 48: Vacant Land at Dick Turpin Way; 46: Ron Smith Recycling, Green Lane; 77: Land South of Western International Market; and 122: Rectory Farm. FORCE consider the proposals to be unsound for a number of overarching reasons set out in their representation.	Comments noted. These comments relate to the spatial strategy/strategic issues, rather than site-specific comments. The allocation provides clear direction on how future development should consider impacts upon the SINC land within the red line boundary and immediately adjoining the site, in line with emerging Policy GB7.
		CPRE	The Council should create a clear identity for this area as Green Belt.	Comment noted. It is critical for the plan to optimise land to help reduce the significant shortfall of industrial floorspace requirements. In these cases, it considers that exceptional circumstances are demonstrated for releasing some of the land for development. The plan would protect existing open spaces and would require compensatory improvements to existing Green Belt land.
		LB Hillingdon	Hillingdon previously objected to this site allocation, with the explanation set out in our letter dated 13 October 2021. In summary: <ul style="list-style-type: none"> • The allocation would remove a continuous extent of Green Belt from Heston to the north of Cranford Park, 	Comments noted . It should be noted that the Employment Land Review Update identifies that even when accounting for planning consents and proposed allocations including sites that are proposed to be released from the Green

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>which currently provides a separation between built developments in the two boroughs.</p> <ul style="list-style-type: none"> • Hillingdon Council does not agree that the site makes a less important contribution to the wider strategic Green Belt. • Its release would result in only a very narrow strip of remaining Green Belt land to the west of the A312, thus impacting the purposes of this land and the shared area of Green Belt that exists between the two local authorities. • The Green Belt Review concludes that the site performs moderately when viewed in isolation. <p>We note that this site remains allocated for industrial use and Green Belt release in the Regulation 19 version of the Hounslow Local Plan.</p> <p>Hillingdon argues that this site should be removed.</p>	<p>Belt to meet industrial employment needs, there remains a shortfall for this type of use in Hounslow. Furthermore, it should be noted that the identified employment needs are not predicated solely on the delivery of a third runway at Heathrow. The Green Belt Assessment which carried out the assessment of the parcel's contribution to the wider strategic Green Belt was carried out by independent consultants under a robust and consistently applied methodology. In this case, it found that the parcel's location adjoining the M4 and A312 limited its connection with the wider countryside. The Council accepts this conclusion. Overall, the Council acknowledges that the parcel performs moderately against Green Belt purposes but considers that exceptional circumstances have been demonstrated to release land here from the Green Belt. This is at to meet specific needs for warehousing and logistics floorspace in the West of the Borough area. LB Hounslow does not agree that these sites should be removed as allocations to make the emerging plan sound.</p> <p>It should be noted that the approach taken to Green Belt release in the emerging Local Plan is to reflect the proposed allocation boundaries, where allocation sites are proposed to be released from the</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>Green Belt. As such, the area to be released from the Green Belt in the vicinity of Western International Market now reflects the proposed allocation boundary of site ref. 77 and thus the following concerns raised in LB Hillingdon’s letter dated 13th October 2021 (to the earlier 2020 Hounslow Local Plan Review) are no longer considered reflective of the proposed Green Belt release in that locality:</p> <p><i>“ • The allocation would remove a continuous extent of Green Belt from Heston to the north of Cranford Park, which currently provides a separation between built developments in the two boroughs.</i></p> <p><i>• Its release would result in only a very narrow strip of remaining Green Belt land to the west of the A312, thus impacting the purposes of this land and the shared area of Green Belt that exists between the two local authorities.”</i></p> <p>It should also be noted, LB Hounslow will present a suggested modification as a correction to the proposed green belt boundary mapping in the Policy Map and as shown on Map 2 within Appendix 2 – ‘Land Proposed To Be Released From The Green Belt To Meet Development Needs’ of the emerging Local Plan to align the area</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				to be released from the green belt in this location with the proposed red-line boundary for emerging site allocation 77 - Land South of Western International Market. This correction is required to ensure a consistent approach is taken to Green Belt release, releasing land that reflects proposed allocation boundaries. (EX57: HLP_A2_02)
		Environment Agency	<p><u>Mineral extraction schemes and groundwater</u> Mineral extraction schemes have the potential to cause adverse impact to groundwater quality as well as the physical disturbance of aquifers and groundwater resources. In this instance the schemes may have adverse impacts on groundwater resources within the shallow Principal gravel aquifers in the borough.</p> <p>Developers of mineral extraction schemes should:</p> <ul style="list-style-type: none"> - Engage with the Environment Agency's Pre-Application Planning Advice Service in order to discuss requirements for the development of such sites. - Ensure developments adhere to the Position Statements outlined in Section N (Groundwater Resources) of the Environment Agency's Approach to Groundwater Protection. This section indicates the supporting risk assessments that must supplement any planning application for mineral extraction schemes. - Developers should contact the Environment Agency to discuss any 	Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose to any modifications to the Plan in relation to this.

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>permitting requirements for mineral extraction schemes. We recommend that the developer considers parallel tracking the planning and permit applications as this can help identify and resolve any issues at the earliest opportunity. Parallel tracking can also prevent the need for post-permission amendments to the planning application. We would welcome a joint discussion with the applicant and planning authority to discuss this further.</p> <ul style="list-style-type: none"> - Subsequent infilling of the sites once mineral extraction has been completed must not have any adverse impacts to groundwater quality or quantity. Again, we would recommend that the Environment Agency are contacted in the future to discuss requirements for such a development. 	
80	34 Staines Road	TfL	<p>The final sentence in the Movement should be deleted as follows: ‘Development is to conform to the maximum parking standards in the London Plan while maximising access by walking, cycling and public transport. Commercial car parking must be available for visitors to the town centre.’ The requirement for commercial car parking should be deleted because the London Plan requires retail development to be car free in areas of PTAL 6a and metropolitan town centres. London Plan Policy T6L also makes it clear that ‘Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.’ The site requirements should also be</p>	<p>Comment Noted. An appropriate level of car parking must be kept and made available to ensure the viability and vitality of the town centre isn’t compromised. The viability of the commercial element is likely to require parking availability for costumers. As such, it is not considered that the proposed modifications to the Site Allocation addresses either a matter of soundness or legality and therefore will not be suggested as a proposed modification.</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			amended as follows: 'Redevelopment of the site to create a mixed-use retail and residential development, with a single large ground floor retail unit (A1) and appropriate level of car parking provision. '	The parties agree to present this matter to the Inspector for their consideration as part of the examination process, per the agreed statement of common ground EX5a.
81	80-82 Staines Road	No representation received at Regulation 19	No representation received at Regulation 19	No representation received at Regulation 19
82	206-210 Hanworth Road	Rockwood Estates Ltd	Rockwood Estates consider an amendment should be made to Part O of Policy CC4 to amend the wording from 'areas of special local character' to instead say "Areas of Special Character" which is how such areas are referred to in the Local Plan Glossary. Rockwood Estates also consider an amendment should be made to site allocation ref 82 to remove the allocation from the Areas of Special Character designation.	Comments noted. No changes are proposed to allocation ref 82. No Areas of Special Character have been proposed for de-designation and there is no evidence to suggest that the locality should be removed from this designation. Changes to Part of Policy CC4 have been agreed and are presented on page 176 of EX57 as modification EIP_C6_64.
83	Vacant Land Clarence Terrace	No representation received at Regulation 19	No representation received at Regulation 19	No representation received at Regulation 19
84	Hounslow Cavalry Barracks	Ministry of Defence	The Defence Infrastructure Organisation (part of the MOD) requests that the mdq of housing in the allocation be made to match the approved planning application at 1525.	The minimum development quantum for number of residential homes in the site allocation was based on capacity work also informing the planning brief (PB1 ⁵⁶) for the site and is considered the appropriate minimum number of homes that could come forward within the allocation boundary. However, at application stage, this does not preclude a

⁵⁶ [PB1 - Hounslow Cavalry Barracks Planning Brief](#)

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>proposal being submitted that puts forward a case demonstrating a higher number of homes could be accommodated through a suitable design solution. This approach to minimum development quantum has been taken for all site allocations, is considered sound and robust, and is therefore retained for consistency.</p>
		<p>Hounslow Property Ventures</p>	<p>Joint Administrators on behalf of Hounslow Property Developments Ltd suggest a number of modifications to site allocation ref 84 to make amendments to the site minimum development quantum and the approach to air quality. It is also requested that the wording in Policy P2 relating to the special architectural and historic buildings at Cavalry Barracks is reviewed, and that Policy SC2 is amended to make it clearer the London Plan Fast Track route and associated thresholds applies to development proposals.</p>	<p>Comments noted. LB Hounslow does not propose any changes to allocation 84 or policy SC2. The minimum development quantum are deemed appropriate for the site and based on capacity work informing the Hounslow Cavalry Barracks Planning Brief SPD. It should however be noted that minimum development quantum are what is considered the minimum figure that should be achieved for specified uses at the site. At pre-application and planning application stage, applicants will have the opportunity to test whether an increase to the mdq could be accommodated through a suitable design solution, though applications will be expected to meet the requirements for building heights set out in Policy CC3 of the Local Plan. Policy SC2 is considered to be in general conformity with the London Plan (2021) referring to London Plan policies H4, H5 and H6. It is correct that the strategic target for affordable housing is 50%, however, where qualifying proposals follow the fast</p>

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				track route of the threshold approach, they can deliver 35% affordable housing. This is made clear in the 'Our Approach' section of Policy SC2 and parts B and C of the policy.
		Sport England	The playing field would be lost but the Planning Brief SPD relating to the site does require that any development must comply with NPPF paragraph 103 and Sport England's Playing Field Policy, therefore the allocation is sound providing the SPD remains in place	Support welcomed. It should also be noted that as with allocation 64, the Planning Designations section states, "Site contains playing pitches. Development must retain and enhance playing fields and sports pitches." Subject to them being in public use, the playing pitches must therefore, as a minimum, be replaced.
85	Builders Yard, 379-389 Staines Road	No representation received at Regulation 19	No representation received at Regulation 19	No representation received at Regulation 19
87	Euro House, Hounslow	No representation received at Regulation 19	No representation received at Regulation 19	No representation received at Regulation 19
88	Land at Bridge Road Depot	GLA	The site is home to non-designated industrial uses and as such Policy E7C of the LP2021 should be followed. The inclusion of a reference to Policy E7C of the London Plan would be welcomed. Existing industrial capacity on the site should be considered as part of a plan led approach towards meeting the borough's industrial needs over the Plan period.	Policy E7C of the London Plan would not apply in the case of Land at Bridge Road Depot, as the red line boundary of the proposed allocation for residential development does not include existing industrial buildings at the site.
89	Land at James Street	CPRE	This land should be retained as an allotment for the benefit of people and nature.	Comments noted. Document EBGB7 (pp.60-61) states that the Land at James Street has not been in use as allotments for over 20 years at the time of the study. Therefore it is considered to be surplus to requirements and available for allocation to meet housing needs.

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90	Inwood Business Park	GLA	<p>The site is home to non-designated industrial uses and as such Policy E7C of the LP2021 should be followed. The inclusion of a reference to Policy E7C of the London Plan would be welcomed. Existing industrial capacity on the site should be considered as part of a plan led approach towards meeting the borough's industrial needs over the Plan period.</p>	<p>The Council has prepared an Employment Note (including updated monitoring data February 2026, Document EX45) which includes figures for industrial capacity on sites allocated for employment uses in the Plan, including the net change in floorspace anticipated based on site MDQs (see Appendix 3).</p> <p>LBH also proposes a modification to include the following wording in site requirements: The site is home to non-designated industrial uses and as such, London Plan (2021) Policy E7 (Industrial intensification, co-location and substitution) Part C should be followed. (EX57: HLP_SA90_01)</p>
		TfL	<p>We welcome the identification of land at Inwood Business Park for the WLO as this would help deliver a bay platform to turn back trains should this be required. It could also help facilitate the delivery of step free access at the station, either as part of WLO or as a separate scheme. Our current preferred approach to turning trains back is a centre turnback siding to the west of the station and road bridge, as this can be delivered within the railway boundary and avoids the need for terminating trains to cross one of the tracks. Although the wording differs slightly from that we previously suggested, we support the following: 'Development proposals will be required to retain land to the north of Hounslow station to facilitate the West</p>	<p>Comments noted.</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			London Orbital Rail line which is proposed to terminate at Hounslow.’	
91	Hounslow Bus Garage	Places for London	Places for London supports the allocation but suggests some wording changes, to include reference to the bus interchange that is co-located with the garage.	<p>Comments noted and support welcomed. A suggested modification is proposed to clarify that the operation of the bus garage and bus station should not be compromised by the position , design and layout of the residential dwellings and amenity spaces, and to refer to the application of the agent of change principle.</p> <p>The proposed modification wording is presented below in response to the comments from TfL.</p>
		TfL	<p>The site allocation should make it clear that it includes the adjacent bus station as well as the bus garage and that both uses will be re-provided as part of the redevelopment proposals in line with London Plan Policy T3 and the Sustainable Transport, Walking and Cycling LPG.</p> <p>We note that: ‘the operation of the bus garage is not compromised by the position of and layout of the residential dwellings and amenity spaces and vice versa.’ We support the requirement that bus garage (and bus station) operations are not compromised. However, the agent of change principle should be applied to ensure that as part of any redevelopment, the residential dwellings are designed and laid out, and incorporate appropriate mitigation, to take account of the 24/7 requirements of an operational bus garage and the adjacent bus station. We recommend that the</p>	<p>Comments noted. Whereas the proposed modification does not address either soundness or legality, it is considered that the proposed additional text will help in clarifying that both the bus station and bus garage are included and that both uses will be re-provided as part of the redevelopment. As such, some text is proposed as a minor modification.</p> <p>The following text is proposed to be added to the Site Requirements section:</p> <p>the operation of the bus garage and bus station are not compromised by the position of, design and layout of the residential dwellings and amenity spaces</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>wording is altered to read: <u>‘the operation of the bus garage and bus station are not compromised by the position of, design and layout of the residential dwellings and amenity spaces and that the agent of change principle is applied to ensure that the rest of the development provides appropriate mitigation to address any impacts arising from the 24/7 operational needs of the bus garage and bus station.’</u></p> <p>Due to TfL land and property interests in the site, Places for London will provide further comments on this site allocation separately.</p>	<p><u>and that the agent of change principle is applied to ensure that the rest of the development provides appropriate mitigation to address any impacts arising from the 24/7 operational needs of the bus garage and bus station.’</u> (EX57: HLP_SA91_01)</p>
92	Upstage	<p>GLA</p> <p>TfL</p>	<p>The site is home to non-designated industrial uses and as such Policy E7C of the LP2021 should be followed. The inclusion of a reference to Policy E7C of the London Plan would be welcomed. Existing industrial capacity on the site should be considered as part of a plan led approach towards meeting the borough’s industrial needs over the Plan period.</p> <p>We note that the site is currently used by Metroline for bus servicing and is proposed for a mixed residential and industrial development without any requirement to</p>	<p>The Council has prepared an Employment Note (including updated monitoring data February 2026, Document EX45) which includes figures for industrial capacity on sites allocated for employment uses in the Plan, including the net change in floorspace anticipated based on site MDQs (see Appendix 3).</p> <p>LBH also proposes a modification to include the following wording in site requirements: <u>The site is home to non-designated industrial uses and as such, London Plan (2021) Policy E7 (Industrial intensification, co-location and substitution) Part C should be followed.</u> (EX57: HLP_SA92_01)</p> <p>Comments noted. Whereas the proposed modification does not address either soundness or legality, it</p>

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			replace the bus servicing facility. The site which is known as 'Lampton' is currently leased by one of our contracted bus operators, who operate up to 40 vehicles, alongside employing around 100 staff on site. Sites such as this, are vital to enable the bus network to operate efficiently and cost effectively. The Movement and Access section should make it clear that if this site were to come forward for development, TfL and the bus operator should be involved in early discussions to identify another site of this size within the immediate vicinity to help provide the same level of service in line with Policy T3 of the London Plan and the Sustainable Transport, Walking and Cycling LPG.	<p>is considered that some proposed additional text will help in giving additional clarity.</p> <p>The following wording is proposed to be added to the site requirements section:</p> <p>For any development proposals that come forward, TfL and the bus operator should be involved in early discussions to identify alternative provision for the bus servicing facility to help provide the same level of service in line with Policy T3 of the London Plan and the Sustainable Transport, Walking and Cycling LPG (EX57: HLP_SA92_02)</p>
		Environment Agency	<p>Historic landfill</p> <p>The upstage site is on the Brookwood Road historic landfill EAHL11061. The historic landfill database indicates waste was deposited between 1962 and 1965.</p> <p>The database indicates that inert waste was deposited and included the waste comments clay, brick, wire and brickearth. The site was unlicensed. Please refer to our comments on development on or near historic landfills on pages 19-22 (within REP106 of Document S9 - Link to Representations made pursuant to Regulation 20 (in response to consultation at Regulation 19 Stage)).</p>	Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.
93	Land at Kingsley Road	No representation received at Regulation 19	No representation received at Regulation 19	No representation received at Regulation 19
95	Tesco Mogden Lane	Environment Agency	Flood Risk	Comments noted. The Council has produced a Sequential and Exceptions

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			The proposed development is located partially in Flood Zone 2. We recommend the sequential approach is followed and that development is steered toward Flood Zone 1 where possible.	Test report 2024 (Document EBEQ1) in line with EA recommendations. Please see Environment Agency & LB Hounslow Statement of Common Ground (2025)(Document S10a).
96	Europa House	Environment Agency	<p><u>Flood Risk and Proximity to Watercourse</u></p> <p>The Europa House site is situated within Flood Zones 2 and 3 (Tidal) and is at risk of flooding in the event of a breach in the tidal flood defences, as well as within close proximity to the River Thames and its flood defences. We therefore recommend the following advice:</p> <ul style="list-style-type: none"> - A 16m buffer for development is required from the defence wall, including any buried elements. Buffer zones should be enhanced to improve the riparian zone where possible. - Condition surveys [of the tidal flood defences] will likely be required at planning stage. The applicant would need to demonstrate that the flood defence can provide the development with protection from flooding for its lifetime (100 years for residential). If the applicant cannot demonstrate that the flood defence can provide the development with protection for its lifetime then remedial works or replacement of the flood defence may be required. - Any work within 16m of the tidal flood defence will require a FRAP. - Sleeping accommodation must not be located below the 2100 breach level. 	<p>Comments noted. The Council has produced a Sequential and Exceptions Test report 2024 (Document EBEQ1) and has been assessed within the LB Hounslow Strategic Flood Risk Assessment Level 2 (2024) (Document EBEQ2) in line with EA recommendations. Please see Environment Agency & LB Hounslow Statement of Common Ground (2025)(Document S10a).</p> <p>It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose to take any further action at this time.</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<ul style="list-style-type: none"> - We would recommend you seek pre-app advice from us, for this site. Thames Estuary 2100 Plan (TE2100) - Thames Tidal flood defences are present at this site and will need to be raised as part of the TE2100 Plan. The applicant would need to demonstrate that the tidal flood defence can be raised in line with TE2100 requirements. 	
97	30 Rugby Road	GLA	<p>The site is home to non-designated industrial uses and as such Policy E7 C of the London Plan 2021 should be followed. The inclusion of a reference to Policy E7 C of the London Plan would be welcomed. Existing industrial capacity on the site should be considered as part of a plan-led approach towards meeting the borough's industrial needs over the Plan period.</p>	<p>The Council has prepared an Employment Note (including updated monitoring data February 2026, Document EX45) which includes figures for industrial capacity on sites allocated for employment uses in the Plan, including the net change in floorspace anticipated based on site MDQs (see Appendix 3).</p> <p>As agreed with the Mayor through our SoCG (Document EX5e), the Council proposes a modification to include the following wording in the site requirements section of the modification:</p> <p><i>The site is home to non-designated industrial uses and as such, London Plan (2021) Policy E7 (Industrial intensification, co-location and substitution) Part C should be followed.</i></p> <p>(see Document EX57, mod code HLP_SA97_01).</p>
		Environment Agency	<p>Flood Risk and Proximity to Watercourse</p> <p>The 30 Rugby Road site is situated within Flood Zones 3 and 2. The culverted Whitton Brook, a designated main</p>	<p>Comments noted. The Council has produced a Sequential and Exceptions Test report 2024 (Document EBEQ1) and</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>river runs through the site. There is also a water storage area present within the site boundary. We therefore recommend the following advice:</p> <ul style="list-style-type: none"> - The site should be reassessed when new Crane modelling becomes available. - Works within 8m of the culvert may require a pre and post works condition survey to be undertaken of the culvert. - Works within 8m of the culvert may require a FRAP. - A condition survey to be undertaken for the water storage area. - We would recommend a pre-app discussion due to this asset. - The applicant should explore opportunities to deculvert the watercourse. 	<p>has been assessed within the LB Hounslow Strategic Flood Risk Assessment Level 2 (2024) (Document EBEQ2) in line with EA recommendations. Please see Environment Agency & LB Hounslow Statement of Common Ground (2025)(Document S10a).</p> <p>It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose to take any further action at this time.</p>
98	Osterley Station Car Park	Places for London	<ol style="list-style-type: none"> 1) References to retaining parking does not comply with London Plan Policy T6 and should be removed as it is unsound. Appropriate blue badge spaces for residents, passengers and, if required, operational use, will be provided. 2) The site should be included in the Lower Scale Tall Building zone in order to deliver the mdq of 50 units. 	<ol style="list-style-type: none"> 1) Comments noted. A suggested modification is proposed, to amend the requirement to retain car parking for station users and instead require car parking specifically for disabled station users to be retained. This modification is presented below in response to comments from TfL. 2) Policy CC3 defines tall buildings on a geographical basis, informed by the Tall Buildings Study (Document EBCC3). The vast majority of the borough is covered by the Lower Scale Tall Building

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>Definition, where a tall building is defined as any building of 21m and above, including rooftop plant. Allocation 98 falls within this definition category. The Tall Buildings Study does not identify Allocation 98 as an appropriate area for tall buildings; the methodology for identifying appropriate areas is set out in section 6.</p> <p>Nevertheless, although this site isn't considered appropriate in accordance with Policy CC3, this does not mean that developers cannot put forward an application for tall buildings outside of the appropriate areas identified. The High Court judgment in London Borough of Hillingdon, R (On The Application Of) v Mayor of London clarified how London Plan (ADP1) Policy D9 on tall buildings should be interpreted. The crucial point from the judgment is that Parts A and B are not gateways that must be satisfied before Part C can be used. In other words, while boroughs must define heights and identify suitable locations, the impact-based criteria in Part C</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>still apply independently. This prevents an overly rigid interpretation that would automatically block tall buildings outside mapped zones. As such, modifications are proposed to Policy CC3 align more closely with the expectations of London Plan Policy D9, namely referring to the fact that tall buildings may be appropriate in the appropriate locations as opposed to being required to be in the appropriate locations and appropriate heights rather than maximum heights</p>
		TfL	<p>We note that the Movement and Access section includes: ‘Disabled car parking, parking for the station should be retained.’ This wording is unclear and it should be made clear that only disabled persons’ parking for users of the station should be retained. We recommend the wording is amended as shown: ‘Disabled persons’ car parking, parking for station users should be retained.’</p> <p>For consistency, please add in under site description: ‘The Site is adjacent to the A4 a major distributor road and TfL Red Route. Development should not adversely impact the transport network.’</p> <p>Due to TfL land and property interests in the site, Places for London will provide further comments on this site allocation separately.</p>	<p>Minor modification to improve clarity in Movement and Access Statement agreed with to give additional clarity. It is not considered that the proposed modification to the Site Description section addresses either a matter of soundness or legality and therefore will not be suggested as a proposed modification in this instance.</p> <p>The following modification is proposed to the Movement and Access section: ‘Disabled persons’ car parking and parking for the station users should be retained’ (EX57: HLP_SA98_03)</p>
99	Feltham Coachworks	Environment Agency	<p><u>Historic landfill</u></p> <p>Feltham Coachworks is on the London Road Sports Ground historic landfill. The historic landfill database</p>	<p>Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>indicates waste was deposited between 1934 and 1951. The database indicates that inert waste was deposited and included the waste comments ash, stone, brick, rubble, clay and wood. The site was unlicensed. Please refer to our comments on development on or near historic landfills on pages 19-22 (within REP106 of Document S9 - Link to Representations made pursuant to Regulation 20 (in response to consultation at Regulation 19 Stage)).</p>	<p>decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.</p>
100	Osterley Park Hotel	National Grid	<p>Modification requested to allocation: The development will include a strategy for responding to the NGET Underground Cable Routes present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."</p>	<p>Comments noted. Guidance regarding National Grid Electricity Transmission assets and how to ensure development does not adversely impact on essential infrastructure is welcomed. National Grid have been consulted throughout the preparation of the Local Plan to ensure that the proposed site allocations would not compromise operation of the electricity network. At planning application stage, development proposals will be required to demonstrate that their design has regard to the NGET Design Guide and Principles. It is therefore not considered that any modifications are required to be made to the site allocations referred to in this representation.</p>
		TfL	<p>For consistency, please add in under site description: 'The Site is adjacent to the A4 a major distributor road and TfL Red Route. Development should not adversely impact the transport network.' We note that: 'Appropriate vehicular access is to be provided from Wood Lane and/or the A4 Great West Road.' As part of the residential redevelopment, the</p>	<p>Transport impacts of proposed development, including on TfL Red Route would need to be assessed at planning application stage. Therefore, it is not considered that the proposed modifications to the Site Description addresses either a matter of</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>opportunity should be taken to close the existing vehicle access from Great West Road which would not be appropriate for access to a residential site in this location and is likely to be opposed by TfL. We recommend the wording: ‘Appropriate vehicular access is to be provided from Wood Lane and the existing access from A4 Great West Road closed.’</p>	<p>soundness or legality and therefore will not be suggested as a proposed modification in this instance.</p> <p>It is considered that additional wording regarding access is useful in clarifying access to the site, and text has been suggested as a proposed modification.</p> <p>Movement and Access Section is to be updated to include: Appropriately designed vehicular access to the site is to be provided. From Wood Lane and/or the A4 Great West Road’— (EX57: HLP_SA100_01)</p>
101	Brentford Group Practice	NHS London Healthy Urban Development Unit	<ul style="list-style-type: none"> - The respondent states that the minimum development quanta for community/health floorspace should be evidence based. - The respondent questions whether the wording “the residential and commercial elements of the development are to be clearly separated” should be revised to clarify that there may be elements of the community and/or commercial use which could be integrated within residential uses. 	<p>Support for inclusion of health in certain site allocations is welcomed. Minimum development quanta are included for allocations to help ensure suitable densities are achieved, and allow for a provision of minimum floorspaces for particular uses. The minimum development quantum for the allocations referred to were amended following the previous Regulation 19 consultation for the since withdrawn Site Allocations DPD (in connection with the since withdrawn West of Borough and Great West Corridor DPDs – Documents ORD8⁵⁷, ORD8a⁵⁸,</p>

⁵⁷ [ORD8 - Hounslow Local Plan Review Volume 2: Site Allocations](#)

⁵⁸ [ORD8a - Hounslow Local Plan Review Volume 3: West of Borough Plan \(Submission Version\)](#)

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>and ORD8c⁵⁹ respectively). This took into account updated information from NHS Property Services regarding proposed uses on the site, and a request to amend reference to leisure uses as a minimum development quantum. The minimum development quantum for the site allocation was amended and now covers both health and community uses.</p> <p>Regarding the requirement for residential and commercial elements of the development to be clearly separated, it is noted that they may be carefully integrated. The separation can be understood to refer to separation by floor level as well as other opportunities for separating the uses, which is considered appropriate.</p>
		The Isleworth Society	<p>The building is relatively new and should be maintained. The Isleworth Society seek reassurance that neither the character of local buildings nor the health centre will be lost temporarily or permanently. Continuity of service of the Watermans Art Centre should be maintained and should be included in the Allocation. Some of the £17 million allocated to this should be used to refurbish the medical centre rather than demolish it.</p>	<p>Comment noted. Site allocation 101 allocates a minimum of 3,690 sqm health/community use including re-providing the health centre. The allocation takes account of NHS Property Services previous comments about the site made during the Regulation 19 consultation on the Site Allocations DPD (Document ORD8) in 2019, which supported new, enhanced healthcare facilities at this location. All applications will be required</p>

⁵⁹ [ORD8c - Hounslow Local Plan Review Volume 4: Great West Corridor Plan \(Submission Version\)](#)

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>to meet relevant context and character policies in the Local Plan which include requirements for sites that are within, or adjoining, any heritage assets, as well as requiring high quality design. The allocation also includes considerations for heritage constraints, which requires the development to conserve and enhance the historic environment where potential harm has been identified. Policy CC3 sets out appropriate heights for the site.</p> <p>Providing continuity of service is generally not within the scope of site allocations, though the type and amount of uses, and development phasing are, which are all specified. The NHS will have standards and requirements in place for continuity of service.</p>
		NHS Property Services Ltd	<p>NHSPS request that the name of allocation ref 101 is corrected to Brentford Health Centre. NHSPS request amendments to allocation ref 101 to remove the minimum development quantum of 3,690 sqm of health floorspace, instead state that ‘the health floorspace requirement is to be determined by the NHS as part of any future application for comprehensive redevelopment’. NHSPS request that reference to residential and commercial elements of the development are separated to clarify that integration/co-location of the uses may be possible.</p>	<p>Comments noted. A modification is proposed to rename allocation 101 to ‘The Brentford Health Centre’, as a correction (see Document EX57, HLP_SA101_0 1).</p> <p>No other modifications are proposed. Minimum development quantum are included for allocations to help ensure suitable densities are achieved and to allow for a provision of minimum floorspaces for particular uses. The minimum development quantum for the allocation referred to were amended</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>following the previous Regulation 19 consultation on site allocations for the since withdrawn Site Allocations DPD (in connection with the since withdrawn West of Borough and Great West Corridor DPDs – Documents ORD8, ORD8a, and ORD8c respectively). This took account of updated information from NHS Property Services regarding proposed uses on the site, and a request to amend reference to leisure uses as a minimum development quantum. The minimum development quantum for the site allocation was amended and now covers both health and community uses.</p> <p>Regarding the requirement for residential and commercial elements of the development to be clearly separated, it is noted that they may be carefully integrated. The separation can be understood to refer to separation by floor level as well as other opportunities for separating the uses, which is considered appropriate.</p>
		Hounslow Green Party	<p>The buildings should not be demolished but refurbished, and continuity of service should be secured</p>	<p>Comment noted. Site allocation 101 allocates a minimum of 3,690 sqm health/community use including re-providing the health centre. The allocation takes account of NHS Property Services previous comments about the site made during the Regulation 19 consultation on the Site Allocations DPD (Documents</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>ORD8) in 2019, which supported new, enhanced healthcare facilities at this location. All applications will be required to meet relevant context and character policies in the Local Plan which include requirements for sites that are within, or adjoining any heritage assets, as well as requiring high quality design. The allocation also includes considerations for heritage constraints, which requires the development to conserve and enhance, the historic environment where potential harm has been identified. Policy CC3 sets out appropriate heights for the site.</p> <p>Providing continuity of service is generally not within the scope of site allocations, though the type and amount of uses, and development phasing are, which are all specified. The NHS will have standards and requirements in place for continuity of service.GP</p>
102	Victory Business Centre	TfL	For consistency, please add in under Movement and Access: ‘Development is to conform to the maximum parking standards in the London Plan while maximising access by walking, cycling and public transport.’	<p>Comments noted. Whereas the proposed modification does not address either soundness or legality, it is considered that some proposed additional text will help in giving additional clarity.</p> <p>The following text is proposed to be added to the Movement and Access section: ‘Development is to conform to the maximum parking standards in the London</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>Plan while maximising access by walking, cycling and public transport. (see Document EX57, mod code HLP_SA102_0 1).</p>
		<p>Environment Agency</p>	<p>Historic landfill The Victory Business Centre is near the Redlees Park historic landfill. The historic landfill database indicates waste was deposited between 1912 to 1946. The database indicates that inert waste was deposited and included the waste comments ash, brick, stone, tile, clinker, wood, concrete, rubble and clay with black odorous staining. The site was unlicensed. Please refer to our comments on development on or near historic landfills on pages 19-22 (within REP106 of Document S9 - Link to Representations made pursuant to Regulation 20 (in response to consultation at Regulation 19 Stage))).</p> <p>Mogden Sewage Treatment Works The Victory Business Centre is within close proximity to the Control of Major Accident Hazards (COMAH) Site, Mogden Sewage Treatment Works.</p>	<p>Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.</p>
		<p>Dunmore Group</p>	<p>The Wireless Factory Business Park should be removed from the Victory Business Centre LSIS. The site is not available for blanket industrial use. The representation states that the site is not in industrial use, and that it should be excluded from the area of the LSIS.</p>	<p>Comments noted but no change is proposed. The Council's employment land evidence base (EBED1) has not highlighted that land here should be removed from the LSIS. It is accepted that there have been some changes of use at the site, but it should be noted that some of these took place using permitted development rights before the introduction of the Article 4 direction withdrawing such rights in designated employment areas including this site.</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
103	West Middlesex Hospital	Chelsea and Westminster NHS Foundation Trust	<ol style="list-style-type: none"> 1) CWNHSFT request that the boundary of the site allocation be amended per the redline given in the appendices. 2) CWNHSFT set out the proposed phasing of the delivery of the planning application at the West Middlesex Hospital. They express support for the allocation of housing at the site as a way to enable development but request that the phasing be altered to the following: 2028-2041. 	<ol style="list-style-type: none"> 1) A suggested modification is proposed to amend the redline boundary for site allocation 103 to reflect the land registry title, incorporating a small area of additional land extending to the south of the existing site boundary (see Document EX57, mod code HLP_SA103_01). 2) Whilst the allocation includes phasing for the site based on information provided to date, it is recognised that there are cases where proposals may come forward in a manner that varies from the phasing that is expected. The phasing specified in site allocations would not necessarily preclude proposals coming forward at an earlier stage, which would be considered on their own merits. It should also be noted that the number of homes and other uses specified in the allocation are minimum development quantum and therefore it is possible for planning applications to put a case forward that seeks to demonstrate a higher number of homes could be accommodated on the site subject to a suitable design solution.

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
		NHS London Healthy Urban Development Unit	It is important that the site allocation is sufficiently robust with flexibility to accommodate the challenges and opportunities facing the Trust and wider NHS over the plan period whilst contributing to the wider vision and objectives where possible.	Comments in relation to allocation 103 are noted. The phasing of the allocation is considered to provide a degree of flexibility for any proposal which come forward.
		TfL	The first sentence of the Movement and Access section should be amended as follows: 'The site is a functioning hospital with large amounts of parking and access routes on site, these the hospital uses must be supported and enhanced <u>with consideration given to the rationalisation of car parking</u> . Appropriately designed vehicular access to the site should be from Twickenham Road including appropriate emergency vehicular access.	As agreed within the SoCG between the Council and TfL (Document EX5a) the following modification is proposed to the Site Requirements section for clarity: 'The site is a functioning hospital with large amounts of parking and access routes on site, these the hospital uses must be supported and enhanced' (see Document EX57 , mod code HLP_SA103_02).
		Environment Agency	<p>Flood Risk</p> <p>The West Middlesex Hospital site is situated within Flood Zones 3b, 3, 2, and is at risk of flooding in the event of a in the tidal flood defences. The applicant would need to consider the following:</p> <ul style="list-style-type: none"> - Best efforts should be made to place all development in areas of site in FZ1. - FZ3b is the functional floodplain, and all development bar water compatible is not permitted. Essential Infrastructure must pass the exception test. - We recommend you seek pre-app advice for this site. - Sleeping accommodation must not be located below the 2100 breach level (tidal). - Development within the 1 in 100+CC outline may be required to provide flood plain compensation. 	<p>Comments noted. The Council has produced a Sequential and Exceptions Test report 2024 (Document EBEQ1) and has been assessed within the LB Hounslow Strategic Flood Risk Assessment Level 2 (2024) (Document EBEQ2) in line with EA recommendations. Please see Environment Agency & LB Hounslow Statement of Common Ground (2025)(Document S10a).</p> <p>It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<ul style="list-style-type: none"> - Finished floor levels to should be above the 1 in 100+CC design flood level + a 300mm freeboard. - This site is not within the Level 2 SFRA. 	well change in the interim, we do not propose to take any further action at this time.
105	Chiswick Telephone Exchange	Environment Agency	<p>This site is situated within flood zones 3 and 2 (tidal), however, is situated outside the tidal breach extent.</p> <ul style="list-style-type: none"> • This site is not within the Level 2 SFRA 	Comments noted. The Council has produced a Sequential and Exceptions Test report (Document EBEQ1) and a 2024 update to the West London Strategic Flood Risk Assessment (SFRA) Level 1 (Document EBEQ3) in line with EA recommendations. The findings of these assessments indicate that the site is not recommended for an exceptions test, or for inclusion in the Level 2 SFRA (EBEQ2). Please see Environment Agency & LB Hounslow Statement of Common Ground (2025)(Document S10a).
		Telereal Securitised Property GP Limited	<p>TSPGPL request modifications to site allocations 105 relating to:</p> <ul style="list-style-type: none"> • The removal of a reference to the Key Existing Office Location designation and policy ED2 from Planning Designations section • Reduction in business floorspace MDQ on feasibility and viability grounds • Amendments to phasing (2031-35) 	Comments noted. No changes proposed to allocations 105, 106, 114. For consistency and clarity, the planning designations section of site allocations refers to all relevant designations impacting the site. It is therefore important to recognise that the sites are in Key Existing Office Locations and include the corresponding policy reference. The sites' minimum development quantum has been derived from capacity testing and the information put forward in Call for Sites exercises. With regard to viability, the Plan is supported by a Whole Plan Viability Assessment which determines that the policies and allocations in the Plan are, in

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				combination, viably sound and deliverable. In terms of phasing, this has been amended in the updated Housing Trajectory (Document EX44i⁶⁰).
106	Royal Mail, Chiswick Delivery Office	Environment Agency	This site is situated within flood zones 3 and 2 (tidal), however, is situated outside the tidal breach extent. <ul style="list-style-type: none"> • This site is not within the Level 2 SFRA 	Comments noted. The Council has produced a Sequential and Exceptions Test report (Document EBEQ1) and a 2024 update to the West London Strategic Flood Risk Assessment (SFRA) Level 1 (Document EBEQ3) in line with EA recommendations. The findings of these assessments indicate that the site is not recommended for an exceptions test, or for inclusion in the Level 2 SFRA (EBEQ2). Please see Environment Agency & LB Hounslow Statement of Common Ground (2025)(Document S10a).
		Telereal Securitised Property GP Limited	TSP GP L request modifications to site allocations 106 relating to: <ul style="list-style-type: none"> • The removal of a reference to the Key Existing Office Location designation and policy ED2 from Planning Designations section • Reduction in business floorspace MDQ on feasibility and viability grounds • Amendments to phasing (2031-35) 	Comments noted. No changes proposed to allocations 105, 106, 114. For consistency and clarity, the planning designations section of site allocations refers to all relevant designations impacting the site. It is therefore important to recognise that the sites are in Key Existing Office Locations and include the corresponding policy reference. The sites' minimum development quantum has been derived from capacity testing and the information put forward in Call for Sites exercises. With regard to viability, the Plan is supported by a Whole Plan Viability

⁶⁰ [EX44i - Updated Housing Trajectory and Completions \(April 2026\)](#)

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				Assessment which determines that the policies and allocations in the Plan are, in combination, viably sound and deliverable. In terms of phasing, this has been amended in the updated Housing Trajectory (Document EX44i).
107	Sainsbury's Chiswick	Sainsbury's Supermarkets Ltd	<p>The representation argues that, in order to align with national policy, Site Allocation 107 should seek to maximise development potential.</p> <p>It is considered that Allocation 107 should be amended to deliver a minimum of 390 homes, alongside the food store and auxiliary parking for the retail use. This is to reflect earlier versions of the allocation (which gave 390 units as opposed to 300) and feasibility studies which give a capacity of 400.</p> <p>The reduction in capacity is not considered to be justified, especially against a backdrop of increasing housing shortages. In preference to Green Belt releases, brownfield land sites should be optimised.</p> <p>It is requested that the retail capacity at the site be increased from 5300sqm to 7000sqm. It is also requested that a car parking quantum be included to support the store, references to conforming to the London Plan parking standards should be removed. The London Plan allows flexibility in parking delivery and this should be reflected in the allocation. Text should be added to state that parking should be appropriate to support retail use and references to London Plan should be removed.</p>	<p>Comments noted. It should be noted that the Local Plan proposes to release Green Belt land to contribute to meeting unmet employment land needs, particularly for industrial logistics development in the West of the Borough. The Local Plan's strategy is able to meet the borough's housing target on brownfield sites, and it is therefore not releasing Green Belt land for housing.</p> <p>The Tall Buildings Study (Document EBCC3) was prepared in spring 2024 to inform the Tall Buildings Policy in the emerging Local Plan, to ensure our Plan is in general conformity with the London Plan. The Tall Buildings Study explores the potential for tall buildings in Hounslow through a review of sensitivities and potential opportunities for growth. It provides definitions of tall buildings for different parts of the Borough (informing the definition in Policy CC3) and makes recommendations on appropriate locations for tall buildings and the potential height of these tall buildings.</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>Reference to a requirement for a new east-west connection to Mills Row is considered unjustified and overly prescriptive. Requirements to improve permeability are accepted and should be informed at a later stage of detailed design.</p> <p>Text highlighting surrounding heritage constraints is considered unnecessary and it is requested that this is removed.</p> <p>It is considered that, for clarity, guidance on height should be included in the allocation wording (i.e., heights of up to 52m AOD). It is also argued that a design-led approach could find that taller elements may be justified, and this should be assessed on a case-by-case basis. Alternative wording is suggested.</p> <p>Text is suggested to ensure that site phasing permits the continued use of the retail store throughout development.</p>	<p>The Tall Buildings Study has helped to inform the capacity of the proposed site allocation. Having regard to the results of the Tall Buildings Study, capacity modelling was undertaken which demonstrated that a minimum development quantum of 300 residential dwellings at Chiswick Sainsburys is reflective of the amount of development that could be accommodated on site in parallel with allocating an appropriate quantum of retail floorspace in order to re-provide the foodstore. Any increase to the capacity would mean the allocation is not consistent with the appropriate heights identified for the site in the Tall Buildings Study as reflected in Policy CC3 of the emerging Local Plan.</p> <p>It should however be noted that these are provided as a 'minimum development quantum' (MDQ) . Applicants will have the opportunity to test whether an increase beyond the MDQ for residential units could be accommodated at pre-application and planning application stage through a suitable design solution, though applications will be expected to meet the requirements of Policy CC3 of the Local Plan.</p> <p>In their completed Call for Sites form, the site promoter for Sainsbury's Chiswick</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>identified the site as an opportunity for redevelopment to provide a larger enhanced replacement store of approximately 50,000 sq ft sales area, as well as new residential use. It is considered that the proposed minimum development quantum of 5,300 sqm (57,048sq ft) is reflective of the floorspace put forward in the Call for Sites entry as being required for the new retail store. It should also be noted that this is expressed as a MDQ in the allocation.</p> <p>With regard to parking, the allocation wording reflects the approach required in Policy T6.3 of the London Plan and is therefore in general conformity with the London Plan. TfL has stated in their representation to the Local Plan that they require the site to conform to the maximum parking standards in the London Plan as set out in Table 10.5 of Policy T6.3. As such TfL has shown that it is not supportive of implementing alternative lower parking standards for the allocation site through the application of Part G of Policy T6.3 of the London Plan, and would prefer that retail use is car free, other than disabled persons parking. LB Hounslow consider that the allocation should provide an appropriate level of car parking to support the retail use while seeking to facilitate increased cycling and pedestrian</p>

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				<p>access and movement across the site. This remains an outstanding matter between the Council and TfL as set out in the SoCG between both parties (Document EX5a). The Council consider that the allocation enables a degree of flexibility for evidence to be provided at application stage to demonstrate the maximum acceptable level of parking that is required at the site.</p> <p>With regard to heritage, the requirement that proposals will need to demonstrate that building heights 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 is outweighed by public benefits, or substantial public benefits in the case of substantial harm, is standard wording that is included for all site allocations in proximity of designated heritage assets. The wording is needed in order to protect designated heritage assets and as a matter of consistency for all applicable allocations. Appropriate building heights are set out in Policy CC3 and are not repeated in site allocations, as it is considered this would be an unnecessary repetition of policies. All relevant site allocations refer to Policy CC3 and the Tall Buildings Study in relation to establishing appropriate</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>heights. It is not considered that a main modification is needed to refer to the appropriate heights within the site allocation to address a matter of soundness.</p> <p>Continuity of trade is not generally a matter for the site allocation and is for the retail provider to determine, though the type and amount of uses, and their phasing are, which are all specified. It is considered that detailed phasing requirements can be considered at application stage.</p> <p>The amendments to the Heritage Constraints are not agreed and the point on design mitigation is covered in Policy CC3, which is appropriate.</p>
		<p>TfL</p>	<p>We note the second sentence of the movement and access section which states ‘Redevelopment should provide an appropriate level of car parking to support the retail use while seeking to facilitate increased cycling and pedestrian access and movement across the site in a way which creates a legible street pattern and which provides high quality pedestrian and cycle routes.’ Given the site PTAL of 4/5 and the location in Chiswick town centre the London Plan would require retail (re)development to be car free. The requirement that ‘Development is to conform to the maximum parking standards in the London Plan while maximising access by walking, cycling and public transport.’ is supported but it should be clarified that ‘an appropriate</p>	<p>With regard to parking, the allocation wording reflects the approach required in Policy T6.3 of the London Plan and is therefore in general conformity with the London Plan. TfL has stated in their representation to the Local Plan that they require the site to conform to the maximum parking standards in the London Plan as set out in Table 10.5 of Policy T6.3, and request that the retail use is car free, other than an appropriate amount of disabled persons parking. LB Hounslow consider that the allocation should provide an appropriate level of car parking to</p>

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			level of car parking' is referring to disabled persons' car parking and that there should be no general car parking for store staff or customers.	support the retail use to ensure it remains viable, whilst also seeking to facilitate increased cycling and pedestrian access and movement across the site. This remains an outstanding matter between the Council and TfL as set out in the SoCG between both parties (Document EX5a). The Council consider that the allocation enables a degree of flexibility for evidence to be provided at application stage to demonstrate the maximum acceptable level of parking that is required at the site.
		St James	<p>1) Site capacity: St James request clarification on how the capacity was calculated for site allocation 107. The current layout, which has indicative massing produced in Vu.City is undesirable and would deliver no affordable housing.</p> <p>Tall Building Study: The acceptability of massing in certain views appears arbitrary and it is unclear if consideration has been given to the 'less than substantial harm' in certain views, as balanced against public benefits, like affordable housing. Site 107 should be designated as a transform area rather than an enhance area site. The description of enhance that is applied to Chiswick High Street and the site cannot be correct.</p> <p>The site is not 'inappropriate' for tall buildings as it does not fall within any of the constraint areas, rather it is covered by a number of supporting designations.</p>	<p>1) Comments noted.</p> <ul style="list-style-type: none"> • The original capacity assessment for the Sainsburys Chiswick site was completed by LB Hounslow as the Local Plan Review 2020 using the Excel site assessment pro forma in the SACA 2020 (EBSC2 Hounslow Site Allocations and Capacity Assessment (SACA) (2024)) • A site Capacity 3D Modelling Tool known as the Hounslow Intensification Tool (HIT) was subsequently developed by the Council in partnership with VU.CITY. • LBH withdrew the Local Plan Review (2020) (ORD8, ORD8a, ORD8c) in 2023 and began preparation of the single Local

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			<p>It would appear the output of the design codes is pre-determined based upon previous work with the massing determined by a ‘numerical design coding exercise’ and has been prepared in isolation of Plan requirements including viability and affordable housing. The proposals for the Sainsbury’s site have been based upon the design code set out in the Hounslow Characterisation and Growth Study (HCGS). The use of visibility as an assessment methodology for tall buildings does not reflect a ‘positive, ambitious and balanced approach’, positive impacts of good design visibility should be considered.</p> <p>Clarification is requested on the relationship between the Chiswick Town Centre Area of Search – Tall Buildings recommendations and the Vu.City analysis undertaken, including which other models have been tested.</p> <p>Assessment of V5 demonstrates, to St James, an under-optimisation of the site with barely visible buildings – these comments apply to many of the views. For instance why are views deemed appropriate from the north not similarly so from the south.</p> <p>Further discussion with the Council is requested based on the visibility-based approach to building mass, which appears to have been carried out separately from other considerations such as public good and further detailed assessment.</p> <p>2) St James argues that there is no justification for the capacity of the Sainsbury’s site being 300</p>	<p>Plan which is now the Hounslow Local Plan 2020-2041 under examination</p> <ul style="list-style-type: none"> • As part of this process, the HIT was utilised to quality check results of the capacity assessments previously undertaken in the earlier 2020 version of the SACA, and to calculate capacities for sites submitted at later stages in the process, such as during the Regulation 18 consultation in November/December 2023. Utilising this new Tool in a 3D modelling format indicated that the 390 home capacity would not be achievable based on the site area and surrounding constraints • Therefore the site was reappraised through 3D modelling utilising the HIT which resulted in the reduction of the capacity to 300 homes. • The Design Code that is presented in the Character Sustainability and Design Codes SPD (SPD1), was produced alongside this capacity work, using the results of the HIT tool capacity check to suggest a potential layout for

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			<p>homes. The Council follows the London Plan housing targets and does not assess housing need; this needs to be clarified. The housing needs study suggests the following points which require clarification: Total need of homes (market and affordable) 27160 – 17641 for projected growth and 9521 for existing demand Fig 51 19058 affordable and 8105 market an equivalent of 1293dpa, which is below the government figure of 1991dpa</p> <p>3) St James argues that the proposed provision of an East-West connection to Mills Row prejudices the delivery of the site and is unjustified. References to potential heritage constraints and appropriate heights should be removed from the allocations.</p> <p>4) St James opposed the reduction in capacity at Site 107 from 390 homes in the previous 2020 Local Plan Review to 300 in the current consultation.</p> <p>5) St James supports the site specific viability assessment for site 107, but the viability assessment of the site is considered to have shortcomings as it is over reliant on ‘generalised assumptions’. The issues are outlined below:</p> <ul style="list-style-type: none"> - The BLV is too low and does not reflect the use of the site as a supermarket. The BLV of the Sainsbury’s store £30m, calculated with a conservative yield is almost double the highest given in the site-specific viability assessment. 	<p>the site that is compliant with the principles of the design tool. This layout is not prescriptive, but presents an option.</p> <ul style="list-style-type: none"> • The Tall Building Study (EBCC3 Hounslow Tall Buildings Study (2024)) tested this layout in combination with the capacity figure to test and set appropriate heights in appropriate locations on the site. • Comments on the tall buildings study are noted. No further modifications are considered necessary to address soundness concerns. <p>2) Comments noted. With regard to the LHNA 2024 (Document EBSC3), Hounslow’s housing target is set by the London Plan. The purpose of the LHNA is to identify the apportionment of different types of affordable housing needs and other types of housing need in the borough, as part of this target.</p> <p>3) Comments noted. No modifications are required. With regard to heritage, the requirement</p>

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			<ul style="list-style-type: none"> - The build cost assumptions may be too low, as they don't consider the higher costs associated with taller towers. - A net:gross ratio of 75% is considered inappropriate for building efficiency, as taller buildings are more complex. A ratio of 70% is preferred. - Exceptional costs: The BNPP study excludes exceptional costs or abnormals. The difficulties involved with delivery of this site would incur much higher costs than estimated in the study. <p>The BNPP testing of the site indicating between 30 and 35% affordable is viable based on the 'secondary offices' BLV. With a higher BLV the viable affordable percentage is 15% and accounting for extra costs this would result in less than 10%. As a result the requirement in the allocation of 50% is not sound.</p> <p>Either the site allocation text should be amended to reflect that 0-10% of the site will be affordable, or the scale of the allocation changed in the Plan/SPD to allow for a greater proportion of affordable housing. The BNPP study should also be updated.</p> <p>Recommendations for changes in text for the BNPP study are given.</p> <p>The sequential flooding assessment should be undertaken as part of the Borough Flood Assessment, not by the applicant.</p> <p>The PDF graphic is illegible and should be changed.</p>	<p>that any proposals will need to demonstrate that building heights 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 is outweighed by public benefits, or substantial public benefits in the case of substantial harm, is standard wording that is included for all site allocations in proximity to designated heritage assets. The wording is needed in order to protect designated heritage assets and as a matter of consistency for all applicable allocations. Appropriate building heights are set out in Policy CC3 and are not repeated in site allocations, and it is considered this would be an unnecessary repetition of policies. All relevant site allocations refer to Policy CC3 and the Tall Buildings Study in relation to establishing appropriate heights. It is not considered that a modification is needed to refer to the appropriate heights within the site allocation as a matter of soundness.</p>

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				<p>4) Comments noted. Site allocations are based on the outcomes of the Site Allocations and Capacity Assessment (2024)(Document EBSC2) which considers the suitability, availability and achievability of sites.</p> <p>Document EBCC3 has helped inform the capacity in the proposed site allocation. Having regard to the results of the Tall Buildings Study, capacity modelling was undertaken which demonstrated that a minimum development quantum for 300 residential dwellings at Chiswick Sainsburys is reflective of the amount of development that could be accommodated on site. Any increase to the capacity would mean the allocation is not consistent with the appropriate heights identified for the site in the Tall Buildings Study and reflected in Policy CC3 of the emerging Local Plan. As above, the development quantum for various uses are provided as minimums, so design solutions can be tested at pre/application stage, providing proposals accord with policy requirements (including for tall buildings).</p>

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				<p>5) Comment noted but not agreed with. It is the role of the Whole Plan Viability Assessment (WPVA, Document EBV1) to determine whether the policies and allocations in the Plan are, in combination, viably deliverable. The WPVA findings do support this conclusion. With regard to testing different affordable housing tenure splits, the WPVA states: “The differences in residual land values between 70% social rent / 30% intermediate, and 60% social rent / 40% intermediate are relatively narrow in most cases, but applying a varied tenure mix can assist on a case-by-case basis at the development management stage to help improve viability where application schemes are on the margins of viability.” Furthermore, the WPVA recognises that to take account of individual site characteristics, conclusions may need to be moderated by a level of flexibility in application of policy requirements at the development management stage. For more details please see the Council’s Stage 1, Matter 6 hearing</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				statement (Document WS6.1⁶¹) and Stage 1 Viability Note (Document EX52⁶²). The Council have produced a Sequential and Exceptions Test report (Document EBEQ1). Mapping will be improved to address legibility concerns.
110	Albany Riverside	Yellowscape Ltd and Bluescape Ltd	<ol style="list-style-type: none"> 1) Flexibility on delivery of arts centre should be included in allocation. 2) Heritage constraints should not be repeated in allocation wording. 	<ol style="list-style-type: none"> 1) Comments noted. It is considered that the allocation is sound and no modifications to introduce further flexibility relating to the delivery of the arts centre is required. 2) The requirement for development to conserve, and enhance the historic environment where potential impacts upon heritage have been identified is referenced in all site allocations where heritage designations are present and should be retained for consistency and to help ensure their conservation. However, a suggested modification is proposed to remove the word “preserve” from both allocations 110 and 111 in relation to heritage assets, in line with the NPPF and the London Plan (see Document

⁶¹ [WS6.1 - LBH Matter 6 Hearings Statement](#)

⁶² [EX52 – Viability Note](#)

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				EX57 , mod code HLP_SA1-123_01).
		The Isleworth Society	This site was built relatively recently and should not be demolished. The Local Plan should aspire to restore this site as an arts centre, mosque and artisan uses, remaining in public use. The current height is appropriate for the setting of the Royal Botanic Gardens, Kew WHS. The IDP has £60 million allocated to this site, of which only £10 million is to be provided by LBH, the £50 million shortfall is unlikely to be filled with property deals. The £10 million should be used to refurbish the site.	Comment noted. A community/culture use that exists within the Albany Riverside Site at the Waterman Arts Centre is to be re-provided as part of site allocation 111 – Half Acre, with the allocation of at least 2,580 sqm community cultural floorspace. As such it is not intended that this use would be lost, but instead re-provided to a nearby site within Brentford Town Centre.
		Environment Agency	<p>Historic landfill The Albany Riverside site is on the Watermans Park historic landfill. The historic landfill database indicates waste last date of waste input was 1865. The database includes the waste comments yellow furnace material, brick, stone, coke, black organic material, clay and clinker. The site was unlicensed. Please refer to our comments on development on or near historic landfills on pages 19-22 (within REP106 of Document S9 - Link to Representations made pursuant to Regulation 20 (in response to consultation at Regulation 19 Stage)).</p> <p>Flood risk The proposed development is in Flood Zone 2, is at risk of flooding in the event of a breach in the tidal flood defences and is located within close proximity to a tidal flood defence. The applicant would need to consider the following:</p> <ul style="list-style-type: none"> • Sleeping accommodation must not be located below the 2100 breach level (tidal). 	<p>Comments noted. As instructed by the EA, the Council completed a site specific Level 2 SFRA Site Assessment for Site 110 Albany Riverside in late February 2025. This Site Assessment has been published as an addendum to the already published SFRA Level 2 and shared with the EA (see Documents EBEQ2b and S10a).</p> <p>It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose to take any further action at this time.</p>

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			<ul style="list-style-type: none"> • A 16m buffer for development is required from the defence wall, including any buried elements. • Condition surveys will likely to be required at planning stage. The applicant would need to demonstrate that the flood defence can provide the development with protection from flooding for its lifetime (100 years for residential). If the applicant cannot demonstrate that the flood defence can provide the development with protection for its lifetime then remedial works or replacement of the flood defence may be required. If the defence needs to be replaced then we would expect the applicant to set back the new flood defence and create intertidal terracing- in line with Estuary Edges guidance. • If any work is permitted within a 16m buffer, a FRAP will be required. • We recommend you seek pre-application advice from us for this site. For details on our pre-application advice service please email HNLsustainablePlaces@environment-agency.gov.uk • This site is not within the L2 SFRA. <p>Thames Estuary 2100 Plan (TE2100) • Thames Tidal flood defences are present at this site and will need to be raised as part of the TE2100 Plan. The applicant would need to demonstrate that the tidal flood defence can be raised in line with TE2100 requirements.</p>	
		Hounslow Green Party	<p>The existing buildings should not be demolished and the allocation should instead seek to restore the arts centre, mosque and other artisan uses on site with funding identified in the IDP.</p>	<p>Comment noted. A community/culture use that exists within the Albany Riverside Site at the Waterman Arts Centre is to be re-provided as part of site allocation 111 – Half Acre, with the allocation of at least 2,580 sqm community cultural floorspace.</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				As such it is not intended that this use would be lost, but instead re-provided to a nearby site within Brentford Town Centre.
111	Brentford Police Station	Yellowscape Ltd and Bluescape Ltd	<ol style="list-style-type: none"> 1) This site should be indicated as appropriate for tall buildings, especially given the existing building on site. An exemption to Policy CC3 is requested 2) Minimum development quantum should be modified: Community/ Cultural(sqm): 2580 and Commercial (sqm): 100. <u>Community/ Cultural/ Commercial (sqm): 1000</u> 3) Request modification to the heritage constraints section 	<ol style="list-style-type: none"> 1) With regard to the suitability of the site for Tall Buildings, given the presence of the site to the Royal Botanic Gardens, Kew UNSECO World Heritage Site, it is not considered appropriate that the site is identified as suitable for tall buildings. Appropriate heights can however be tested through the planning application process. Accordingly, it is also considered justified and appropriate that the allocation wording for ref. 111 references Policy CC3 setting out appropriate heights for the site. This is consistent with the approach taken in all proposed site allocations. It should be noted that a site being assessed as suitable for development in the Site Allocations and Capacity Assessment (SACA) (EBSC2) does not correspond to the site necessarily being suitable for tall buildings. 2) The minimum development quantum for 2,580 sqm community/cultural floorspace at Brentford Police Station is to ensure suitable re-provision of the

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				art centre (formerly on the Watermans site – allocation 110). 3) A suggested modification is proposed to remove the word “preserve” from both allocations 110 and 111 in relation to heritage assets, in line with the NPPF and the London Plan (see Document EX57 , mod code HLP_SA123_01).
113	69 to 77 Boston Manor Road	No representation received at Regulation 19	No representation received at Regulation 19	No representation received at Regulation 19
114	Royal Mail Delivery Office	Telereal Securitised Property GP Limited	TSP GP L request modifications to site allocations 105, 106, 114, and to Policy CC3 of the Plan.	Comments noted. No changes are proposed to allocations 105, 106 or 114. For consistency and clarity, the planning designations section of site allocations refers to all relevant designations impacting the site. It is therefore important to recognise that the sites are in Key Existing Office Locations and the corresponding policy. The sites’ minimum development quantum have been derived from capacity testing and the information put forward in Call for Sites exercises. With regard to viability, the Plan is supported by a Whole Plan Viability Assessment (EBV1) which determines that the policies and allocations in the Plan are, in combination, viably sound and deliverable.
115	Vacant site, Hanworth Road, Hanworth Road, TW3 3UA	No representation received at Regulation 19	No representation received at Regulation 19	No representation received at Regulation 19

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
116	1 Burlington Lane	Burlington Properties Ltd	<p>The representor supports the allocation but raises a number of modifications relating to allocation 116 relating to:</p> <ul style="list-style-type: none"> • Increasing the MDQ for residential units • Removing MDQs for industrial and business floorspace • Introducing a small MDQ for flexible Class E (retail) • Amendments to the ‘heritage constraints’ section • Amending the ‘site requirements’ section to address the above requested amendments, plus removing a reference to improving pedestrian underpass access, and inclusion of a reference to a 9-10 storey height range for the site. • A request to amend the red-line boundary to remove an area owned by TfL. 	<p>Support for allocation of site ref. 116 welcomed.</p> <p>The residential minimum development quantum for the site has been informed by the Tall Building Study (Document EBCC3) evidence base which identifies appropriate heights for the site along with capacity modelling that takes into account the appropriate heights.</p> <p>With regard to employment floorspace, the allocation seeks to deliver a suitable amount of business and industrial floorspace, with diversification to provide industrial workspaces for the creative industries which are identified in the ELR 2024 (Document EDED1) as a growing cluster in the east of the borough, requiring new workspaces. The allocation also allows for a reduction in office floorspace compared to the existing provision at the site, but with a retained quantum which contributes to meeting identified needs for office floorspace in the ELR (EBED1).</p> <p>Comments regarding heritage are noted, and a suggested modification will be proposed to the site allocation to remove reference to “preserve” the historic environment. “Conserve” will be retained (see Document EX57, mod code HLP_SA1-123_01).</p>

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				<p>Comments on site requirements noted. No further modifications are proposed. The improved link to the Hogarth roundabout pedestrian underpass to the east of the site, refers to on-site access to connect to this public route, so can be achieved as part of the site design proposals. Furthermore, no changes are proposed to where the reference to Policy CC3 and the Tall Buildings Study is included which, for consistency, is always located in the Heritage Constraints section of the proposed allocations.</p> <p>Comments noted with regard to the redline site location plan for the site, however, the allocation boundary is consistent with the Figure 1 Location Plan submitted as part of Burlington Properties Ltd's Regulation 18 representation for the site.</p>
		TfL	<p>For consistency, please add in under site description: ‘The Site is adjacent to the junction of the A316 and A4 which are major distributor roads and TfL Red Routes. Development should not adversely impact the transport network.’</p>	<p>Comment noted. It is considered that the proposed modifications to the Site Description addresses neither a matter of soundness nor of legal compliance, and therefore the Council do not agree to present a suggested modification.</p> <p>This has been agreed between both parties in the SoCG (Document EX5a).</p>
		Environment Agency	<p>Flood Risk This site is situated within Flood Zone 2 (tidal).</p>	<p>Comments noted. The Council has produced a Sequential and Exceptions</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<ul style="list-style-type: none"> • This site is not within the Level 2 SFRA. 	<p>Test report (Document EBEQ1) and a 2024 update to the West London Strategic Flood Risk Assessment (SFRA) Level 1 (Document EBEQ3) in line with EA recommendations. An exceptions test assessment was conducted and the site was deemed to comply subject to an appropriate site layout and site-specific flood risk assessment at application stage. The site was screened in the level 1 SFRA and a Level 2 SFRA (EBEQ2) was not recommended. Please see Environment Agency & LB Hounslow Statement of Common Ground (2025)(Document S10a).</p>
117	The Treaty Centre	TfL	<p>Given the site PTAL of 6a/6b and the location in Hounslow town centre the London Plan would require retail and residential development to be car free. There should be amendments to the Movement and Access section to reflect this as follows: ‘Development should seek to <u>limit car parking on the site to the minimum necessary and any re-provided car parking should be clearly justified as public parking to serve the town centre as a whole.</u>re-provide the car park for the site in an alternative location, maintaining an appropriate level of car parking to serve the town centre based on expected levels of demand. The level of town centre car parking must be agreed with the Council and ensure that the vitality and viability of the town centre is not adversely impacted. <u>This should take account of current levels of use of all town centre car parks and targets for mode share...</u>’</p>	<p>Comment noted.</p> <p>It is not considered that the proposed modifications to the Movement and Access section addresses either a matter of soundness or legality and therefore will not be suggested as a proposed modification in this instance. The site will have some commercial/retail space and it is considered that some parking is necessary for this use to protect the vitality and viability of the Town Centre.</p> <p>The parties agree in the SoCG (EX5a) to present this matter to the Inspector for their consideration as part of the examination process</p>

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			<p>'Development is to conform to the maximum parking standards in the London Plan while maximising access by walking, cycling and public transport. Residential and retail development is to be car free except for provision of disabled persons parking.'</p>	
		<p>NEG The Treaty Ltd</p>	<ol style="list-style-type: none"> 1) NEG supports the principle of identifying residential capacity of the Treaty Centre allocation with the Site Allocations Capacity Study but considers that indicative capacity should be amended to reflect the preapp scheme. It is considered that the SACS underestimates the capacity of the site which, through preapp discussions is considered to be around 1455 residential units alongside other uses. The proposed capacity of 750 is considered unviable and NEGS requests that the minimum be raised to 1400 in the SACS. 2) NEG is supportive of the principle of allocating the Treaty Centre within the Plan, however the following comments are made: These amended proposed minimum development quantums are suggested, per preapp discussions with LBH: <ul style="list-style-type: none"> - 1400 residential units -1200sqm (GIA) retail floorspace fronting the High Street - 4300sqm (GIA) retail floorspace to the south of the High Street - 1000sqm (DIA) community/cultural floorspace fronting the High Street, above retail uses - 1800sqm (GIA) business related uses at mezzanine level south of High Street 	<ol style="list-style-type: none"> 1) Comments noted. No changes are proposed to the minimum development quantum for the site which are based on detailed capacity assessments as part of the SACA (EBSC2) and have regard to the aims and aspirations for the site in the Hounslow Town Centre Masterplan (EX1.06). It should be noted that at application stage, a case can be put forward for proposals that would deliver above the minimum development quantum, subject to a suitable design solution being achieved. 2) Comments noted. No changes are proposed to the minimum development quantum for the site which are based on detailed capacity assessments and have regard to the aims and aspirations for the site in the Hounslow Town Centre Masterplan. A Local Plan is also supported by a Whole Plan Viability Assessment which

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>- 250sqm (GIA) of leisure (health and Wellbeing) floorspace, south of the High Street.</p> <p>NEG argue that is it currently set out in the site is unviable and should be amended in line with the above.</p> <p>3) NEG support the allocation of the Treaty Centre in the draft Local Plan but request that the red line be amended to include all the shops fronting the High Street.</p> <p>NEG argue that the current redline, driven by landownership, does not reflect the policy position set out in other areas of the Plan. This includes the Council’s stated intention, in Policy IMP2, to use CPOs to support wider regeneration schemes. The current Allocation does not support comprehensive redevelopment of the site, per CC2. Enlarging the redline would necessitate a comprehensive approach to redevelopment, which would align better with Plan aims.</p> <p>4) NEG request the redline of draft allocation 117 be amended to incorporate all existing buildings fronting the High Street. This would support Policies aimed at improving the viability of the Town Centre.</p> <p>5) With regards to the tests of soundness NEG find that: a) The allocation has been positively prepared b) The allocation as it is currently</p>	<p>concludes the proposed allocated development could viably be achieved at the site.</p> <p>It should be noted that at application stage, a case can be put forward for proposals that would deliver above the minimum development quanta, subject to a suitable design solution being achieved.</p> <p>3) The redline is based on the current ownership and context. The shops fronting the High Street are locally characterful (and in one case locally listed) and the Council would not automatically accept their loss. It is for a developer to acquire the land and then make the case for demolition.</p> <p>4) Comments noted. No changes are proposed to the minimum development quanta for the site which are based on detailed capacity assessments and have regard to the aims and aspirations for the site in the Hounslow Town Centre Masterplan (EX1.06⁶³). A Local Plan is also supported by a Whole Plan Viability Assessment (EBV1) which concludes the</p>

⁶³ [EX1.06 - Hounslow Town Centre Masterplan \(2024\)](#)

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>proposed is not justified for the reasons set out in the representation c) The allocation is effective d) The allocation is considered to be inconsistent with national policy as it does not fully support Chapter 7 of the NPPF which seeks to ensure the viability of town centres</p>	<p>proposed allocated development could viably be achieved at the site.</p> <p>It should be noted that at application stage, a case can be put forward for proposals that would delivery above the minimum development quanta, subject to a suitable design solution being achieved.</p> <p>5) Comments noted. No changes are considered necessary. The site redline is based on the current ownership, context and availability of land. Availability of land is assessed in the Site Allocations and Capacity Assessment (2024) (EBSC2), and sites must meet this test in order to be considered for allocation. The shops fronting the High Street are locally characterful (and in one case locally listed) and the Council would not automatically accept their loss. It is for a developer to acquire the land and then make the case for demolition.</p>
118	GSK	Bretnside Developments	<p>1) The respondent argues that embedding into the Site Allocations requirements for heritage, flood risk, amenity etc., assessments is not justified</p>	<p>1) It is appropriate for the allocation to refer to supporting documents that are required at application</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>in the terms of the NPPF. These requirements are already in the Local Plan, and the need for individual assessments will be decided between officers and the applicant at pre-application stage</p> <p>2) Heritage and Townscape The Site Allocation refers to nearby heritage assets without naming some of the nearby assets specifically. The removal of references to impact on nearby heritage assets in terms of conservation, preservation or enhancement, and the removal of some views from the GWCM is taken as an indication that there may be some impact on this from the redevelopment. In order to accord with Paras 205-209 of the NPPF, any less than substantial harm caused to designated heritage assets should be considered in the wider planning balance.</p> <p>3) The respondent requests that the wording of the allocation be adjusted to conform to the London Plan sustainability requirements.</p> <p>4) The respondent requests that the use classes of the allocation (118) are expanded to improve the deliverability of the scheme.</p>	<p>stage, so long as there is a policy requirement for them to be submitted, as per the policies in the Local Plan.</p> <p>2) Any updates to the GWC Masterplan (EBCC4) have been made in order to ensure robust site allocations. It is not considered appropriate to include the planning legislative test in policy regarding the planning balance. This is a given and should not be repeated in policy and forms the basis of all Council planning decision-making.</p> <p>3) Comments noted. Suggested modification ref HLP_SA118_01 in EX57 is proposed to allow greater flexibility in relation to sustainability requirements, clarifying that policies should aim to conform to the highest standard of sustainability.</p> <p>4) See response to comments containing suggested amendments to allocation under (3) and (8).</p>

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			<p>5) The respondent situates their site (Allocation 118) and suggests possible land uses involved in the redevelopment.</p> <p>6) The Movement and Access section from the Site Allocations should be removed for conciseness. There is Limited information in terms of timeframes for West London Orbital</p>	<p>5) Comments noted. Mixed use proposals would be suitable at the proposed allocation. With regard to co-living development please refer to emerging Policy SC11 – Other Forms of Housing. As demonstrated by the Local Housing Needs Assessment 2024 (Document EBSC3), there is very limited need for co-living accommodation in LB Hounslow and therefore emerging Policy SC11 resists this type of development except in limited cases where it can be demonstrated with independently prepared evidence that there is a specifically identified local market demand for the type of housing proposed and that it would not constrain the delivery of conventional residential uses for which there is a high demand, such as family sized housing and affordable housing. If that policy test is met, it is also a requirement that co living accommodation is located in an accessible location that can absorb intensive usage.</p>

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			<p>and how it is deliverable from a funding feasibility perspective. Further detail is requested so it can be understood how the proposal at 980 Great West Road can integrate with West London Orbital.</p> <p>7) Representation suggests a stronger emphasis on supporting residential development at the site. The representation states that the requirement in various policies for no net loss of employment space in Policy P1 is not consistent with the London Plan. It states that there should be further evidence on the need for floorspace to support the creatives industries. The representation supports parts D and G of the policy. The representation proposes a wording change to Part O of Policy P1 in relation to car free development.</p>	<p>6) Comments noted but no changes proposed. The structure of all site allocations includes a Movement and Access section which focusses on transport matters and movement around a site, which is considered helpful and positively prepared as the structure allows the allocations to focus on a number of separate key issues and requirements. This structure is to be retained for consistency across all allocations. The timescales for delivery of the West London Orbital are indicative at this stage and it is therefore not possible to propose changes to the Local Plan to include a more specific timeframe for its implementation.</p> <p>7) Comments noted. The development mix for the site includes residential development; the site is currently a key employment site and so it is essential that this is a mixed-use development. The Council considers that the very substantial requirement for employment floorspace in the borough provides strong justification for its approach to site proposals</p>

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			<p>8) Representation questions the designation of the former GSK site as being within the KEOL, given ‘the weakness of the office market’ and the challenges in delivering a scale of office development comparable to the current purpose-built development at the site.</p>	<p>delivering additional employment floorspace. The Council considers that the evidence base already provides a strong justification for the need for floorspace to support creatives industries, and this site is located within the mayor's Creative Enterprise Zone. Comments are noted and agreed in response to the strategic aims of policy P1 and to the terminology of car free developments. See suggested modification to Policy P1, ref EiP_C2_08 in Document EX57 in relation to car free developments.</p> <p>8) Comments noted but disagreed. The site is a major employment site in the GWC, and the evidence base shows an ongoing requirement for a significant scale of employment floorspace including offices. The Council considers therefore that removal of employment designations in the Plan would not be justified. Suggested modification ref HLP_SA118_02 is proposed in Document EX57 to provide clarification that the 2-year marketing requirement that applies to sites in Key Existing</p>

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			<p>9) The representation requests that references to a 'landmark building' on the site be removed. The status of the building on the site is not protected through legislation or policy, neither is the site located in a conservation area. As such the wording is considered to read as design guidance rather than Local Plan Policy and is contrary to Paragraph 35 of the NPPF.</p>	<p>Office Location designations is not waived in the case of allocation site ref 118. This is also subject to the modification proposed to introduce flexibility for this marketing requirement in specified circumstances (modification ref EIP_C4_19 in Document EX57).</p> <p>9) Comments are noted, however they are not agreed. The priorities stated echo those in the GWC masterplan and the approach to building heights is guided by the GWC masterplan. The use of the word landmark is part of common Urban Design usage and is to be taken in the context of the site allocations and constraints informing it. It is designed to help create a sense of place on the site and in the wider GWC.</p>
		<p>TfL</p>	<p>We note the following requirements in the Movement and Access section: 'Vehicle access needs to be redesigned to reduce impact on Boston Manor Road and the A4 Great West Road with priority given to pedestrians and cyclists but minimising the impact on traffic flow' and 'Development should facilitate the creation of a green and pedestrian/cycle-friendly</p>	<p>The Council have provided detailed responses to each of these (in the Table starting on Page 3 of the Representation), through the SoCG (EX5a) process and also in the Modifications Table, where they are agreed with. The SoCG has been drafted and shared with TfL and will be</p>

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			<p>boulevard on the Great West Road by improving the existing infrastructure including crossings over the Great West Road to better integrate the site into the town centre.' While we are supportive in principle of measures that improve active travel along the Great West Road corridor, we would need to work closely with the borough on any proposed improvements so that any impacts on TfL's role as highway authority are considered from the outset.</p>	<p>presented to the inspectors during the examination process.</p>
		<p>The Isleworth Society</p>	<p>The Allocation should be clear that propositions should have a minimum of demolition, elements of the building including the internal street should be reused. There is an opportunity to increase greening on the site and open the towpath. The Local Plan should specify the amount of green space, allotments spaces, community orchard space and residential, business and industrial are to be provided in the development.</p> <p>The consultations on the future of the site have excluded local groups such as The Isleworth Society and Brentford Voice</p>	<p>Comments noted. The allocation has been prepared at a time where it is not yet known whether and to what extent it will be viably possible to retain existing buildings on the site, and therefore cannot draw conclusions about this, which also impacts how specific the allocation can be about land use quantum/amounts. The allocation includes detailed design requirements for the site including the following public/open space requirements:</p> <ul style="list-style-type: none"> - Improve quality and public access to on site and adjoining Metropolitan Open Land (MOL), with a green buffer created between the developable portion of the site and MOL at Boston Manor Park. - Sensitively manage transitions in scale between new and or existing development and surrounding development in neighbouring areas, avoiding an overbearing presence on

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				<p>smaller scale existing development and overshadowing of public and green space.</p> <ul style="list-style-type: none"> - Improve public access to the River Brent and contribute to the creation of a continuous publicly accessible riverside walk; <p>The allocation also requires proposals to consider the retention of the GSK building to ensure best use of resources and embedded carbon. Proposals of the scale of Former GSK will also be required to demonstrate compliance with London Plan (ADP1) Policy SI2 – Minimising Greenhouse Gas Emissions – and how they support Whole Life Cycle Carbon by producing a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.</p>
		Environment Agency	<p><u>Flood Risk and Proximity to Watercourse</u></p> <p>The proposed development borders the river Brent and is in Flood Zones 3, 2 and tidal breach. Flood defences take the form of natural high ground. We therefore recommend the following advice:</p> <ul style="list-style-type: none"> • Ensure where possible an 8m buffer is left between watercourse and development, any works inside of 8m will require a Flood Risk Activity Permit (FRAP). • Buffer zones should be enhanced to improve the riparian zone where possible. 	<p>Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.</p>

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			<ul style="list-style-type: none"> • The sequential approach should be applied, and development should be directed towards areas of the site at lowest risk of flooding. • Development inside the 1 in 100 + CC area will require Floodplain Compensation. • Sleeping accommodation must not be located below the 2100 breach level (tidal). • Finished Floor Levels should be raised to at minimum 300mm above the 1 in 100 + CC Scenario. 	
		Hounslow Green Party	<p>The existing building was built recently and is of a good design so the allocation should support uses which will reuse as much of the building as possible, with more minimum development quanta added for clarity</p>	<p>Comments noted. The allocation has been prepared at a time where it is not yet known whether and to what extent it will be viably possible to retain existing buildings on the site, and therefore cannot draw conclusions about this, which also impacts how specific the allocation can be about land use quantum/amounts. The allocation includes detailed design requirements for the site including the following public/open space requirements:</p> <ul style="list-style-type: none"> - Improve quality and public access to on site and adjoining Metropolitan Open Land (MOL), with a green buffer created between the developable portion of the site and MOL at Boston Manor Park. - Sensitively manage transitions in scale between new and or existing development and surrounding

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				<p>development in neighbouring areas, avoiding an overbearing presence on smaller scale existing development and overshadowing of public and green space.</p> <ul style="list-style-type: none"> - Improve public access to the River Brent and contribute to the creation of a continuous publicly accessible riverside walk; <p>The allocation also requires proposals to consider the retention of the GSK building to ensure best use of resources and embedded carbon. Proposals of the scale of Former GSK will also be required to demonstrate compliance with London Plan Policy SI2 – Minimising Greenhouse Gas Emissions – and how they support Whole Life Cycle Carbon by producing a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions</p>
		Canal and River Trust	<p>Improvements to the Orbit footbridge should be included in the SA as there is scope to improve connections as part of direct walking and cycling routes to the Orbit bridge and over the bridge itself. We would welcome inclusion of improvements to access points included in the allocation.</p>	<p>Comments noted. We note that C&RT have stated that they are not aware of any in principle concerns with proposed site allocations at this stage. The Council would note that, in terms of potential impacts of future development upon the canal network, Policies GB5, GB6 and EQ3 provide a suitable framework to ensure any impacts would be mitigated and that</p>

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				<p>improvements to the network would be promoted. Whereas it is not considered that the comments received on this Allocation question the Plan's soundness or legality, the Council acknowledges that C&RT are the statutory body of the canal network and as such would be consulted at application stage of any proposal that impacted the canal network. Through this consultation and following design principles that are supported elsewhere in the Plan, given that no soundness issues have been raised in this representation, the Council considers that any further detailed matters could be addressed at application stage.</p>
119	Convent Way Estate	The Isleworth Society	This site should be refurbished rather than demolished.	<p>Comments noted but not agreed. Technical assessments indicate that maintenance issues and non-compliance with current Building Safety Act regulations have rendered the site unable to meet the Decent Homes Standard economically. An assets review has been undertaken and concludes that it would not be financially viable to bring the buildings at Convent Way up to required standards. That approach would also provide less opportunity to create a new well designed inclusive neighbourhood on the site.</p>

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		Environment Agency	<p><u>Historic landfill</u> Convent Way Estate is on the Convent Way historic landfill EAHLD35598. The historic landfill database indicates waste was deposited between 1913 and 1934. The database indicates that inert waste was deposited and included the waste comments clay, gravel, ash, silt, brick, rubble, glass, coal, cinders and pottery. The site was unlicensed. The historic landfill database shows that gas control is in place. Convent Way Estate is also adjacent to the Airlinks, Hounslow historic landfill EAHLD35598. The site was previously licensed with WML 80029 granted in 1993 and revoked in 2008. This landfill was formed by the deposition of inert waste in a series of bunds on an existing landfill of household waste deposited in the 1950's and 1960's. The landfill was known to be producing landfill gas. Landfill gas has been detected in the past from boreholes on site. We (the Environment Agency) also have letters indicating passive gas vents have been installed as a gas control measure. Please refer to our comments on development on or near historic landfills on pages 19-22 (within REP106 of Document S9 - Link to Representations made pursuant to Regulation 20 (in response to consultation at Regulation 19 Stage)).</p>	<p>Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.</p>
		Canal and Rivers Trust	<p>This site would offer a good opportunity for future residents for commuting, access to local facilities and green space. The site requirements should include support improvements to connectivity and access to the towpath at Western Road, and at The Common west of North Hyde Bridge</p>	<p>Comments noted. We note that C&RT have stated that they are not aware of any in principle concerns with proposed site allocations at this stage. The Council would note that, in terms of potential impacts of future development upon the canal network, Policies GB5, GB6 and EQ3 provide a suitable framework to ensure any</p>

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				<p>impacts would be mitigated and that improvements to the network would be promoted. Whereas it is not considered that the comments received on this Allocation question the Plan's soundness or legality, the Council acknowledges that C&RT are the statutory body of the canal network and as such would be consulted at application stage of any proposal that impacted the canal network. Through this consultation and following design principles that are supported elsewhere in the Plan, given that no soundness issues have been raised in this representation, the Council considers that any further detailed matters could be addressed at application stage.</p>
		Hounslow Green Party	<p>the estate should be refurbished rather than demolished and rebuilt</p>	<p>Comment noted but not agreed. Technical assessments indicate that maintenance issues and non-compliance with current Building Safety Act regulations have rendered the site unable to meet the Decent Homes Standard economically. An assets review has been undertaken and concludes that it would not be financially viable to bring the buildings at Convent Way up to required standards. That approach would also provide less opportunity to create a new well designed inclusive neighbourhood on the site.</p>

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120	Land North of Church Rd	CPRE	The Council should adopt a brownfield land-led approach to providing GTTS housing. Government planning policy states that GTTS accommodation in the Green Belt constitutes inappropriate development.	<p>Comment noted. The Council has prepared a Green Belt Background Paper (incorporating Exceptional Circumstances Assessment) (Document EBGB1⁶⁴) which sets out the process for the selection of sites and demonstrates what exceptional circumstances exist for the release of sites to meet the specialist housing needs of Gypsies Travellers and Travelling Showpeople (GTTS).</p> <p>Paragraph 2.10 of Document EBGB1 provides the national policy context whereby the Planning Policy for Traveller Sites, published in 2015 and updated in 2024, sets out that traveller sites are inappropriate development in the Green Belt. It states that if a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan-making process and not in response to a planning application. It says that, if land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.</p>

⁶⁴ [EBGB1 – Green Belt Background Paper](#)

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				<p>The Council considers that, owing to the limited availability of brownfield land in the borough, windfall sites would be unlikely to come forward on land that is not designated Green Belt or MOL.</p> <p>As GTTS in the Green Belt would constitute inappropriate development, the Council is seeking to meet the needs for GTTS sites through the plan-making process.</p> <p>Paragraphs 4.7 – 4.14 of EBGB1 set out the process for the selection of sites. As explained in the Background Paper, due to the pressing need to find sites to meet GTTS needs, and extremely limited availability of previously developed land in the borough, the Council considers that exceptional circumstances exist for the removal of these sites as an exceptional, limited alteration to meet a specific, identified need for a Gypsy, traveller or Travelling showpeople site, in accordance with the PPTS 2024. It is not considered that the proposed site insets would cause wider harm the Green Belt, and the Council considers that their removal is justified by the lack of alternative site options for meeting the need for traveller sites.</p>
		GLA	<p>The site is currently designated Green Belt. The proposed use is for Gypsy and Traveller pitches / Travelling Showpeople plots which is not an appropriate use in the Green Belt. As such LBH will need to</p>	<p>Noted. The allocations state that the sites are proposed to be inset from the Green Belt to meet the specialist housing needs</p>

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			demonstrate exceptional circumstances to justify the development here.	of Gypsies and Travellers/Travelling Showpeople in Hounslow. The Green Belt Background Paper (incorporating Exceptional Circumstances Assessment) (Document EBGB1) provides an outline of the exceptional circumstances which the Council considers are demonstrated to justify the release of land from the Green Belt for the use of Gypsy and Traveller and Travelling Showpeople accommodation.
		Environment Agency	Historic landfill Land North of Church Road is on the Lower Park Farm historic landfill. The historic landfill database indicates that inert waste, industrial waste, household waste and special waste was deposited. The site was unlicensed. Please refer to our comments on development on or near historic landfills on pages 19-22 (within REP106 of Document S9 - Link to Representations made pursuant to Regulation 20 (in response to consultation at Regulation 19 Stage)).	Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.
121	Land South of Bedfont Rd	CPRE	As above. LBH should be creating a clear identity for the Bedfont Lakes Country Park as a part of the Green Belt.	Comment noted. The Council has prepared a Green Belt Background Paper (incorporating Exceptional Circumstances Assessment) (Document EBGB1) which sets out the process for the selection of sites and demonstrates what exceptional circumstances exist for the release of sites to meet the specialist housing needs of Gypsies Travellers and Travelling Showpeople (GTTS).

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
				<p>Paragraph 2.10 of Document EBGB1 provides the national policy context whereby the Planning Policy for Traveller Sites, published in 2015 and updated in 2024, sets out that traveller sites are inappropriate development in the Green Belt. It states that if a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan-making process and not in response to a planning application. It says that, if land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.</p> <p>The Council considers that, owing to the limited availability of brownfield land in the borough, windfall sites would be unlikely to come forward on land that is not designated Green Belt or MOL. As GTTS in the Green Belt would constitute inappropriate development, the Council is seeking to meet the needs for GTTS sites through the plan-making process.</p> <p>Paragraphs 4.7 – 4.14 of EBGB1 set out the process for the selection of sites. As</p>

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				<p>explained in the Background Paper, due to the pressing need to find sites to meet GTTS needs, and extremely limited availability of previously developed land in the borough, the Council considers that exceptional circumstances exist for the removal of these sites as an exceptional, limited alteration to meet a specific, identified need for a Gypsy, traveller or Travelling showpeople site, in accordance with the PPTS 2024. It is not considered that the proposed site insets would cause wider harm the Green Belt, and the Council considers that their removal is justified by the lack of alternative site options for meeting the need for traveller sites.</p>
		<p>GLA</p>	<p>The site is currently designated Green Belt. The proposed use is for Gypsy and Traveller pitches / Travelling Showpeople plots which is not an appropriate use in the Green Belt. As such LBH will need to demonstrate exceptional circumstances to justify the development here.</p>	<p>Noted. The allocations state that the sites are proposed to be inset from the Green Belt to meet the specialist housing needs of Gypsies and Travellers/Travelling Showpeople in Hounslow.</p> <p>The Green Belt Background Paper (incorporating Exceptional Circumstances Assessment) (Document EBGB1) outlines the exceptional circumstances the Council considers are demonstrated to justify the release of land from the Green Belt for the use of Gypsy and Traveller and Travelling Showpeople accommodation.</p>

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		Chrisfys Properties Ltd	<p>The representation is supportive of Site Allocation 121 and the recognition by LBH that an enabling development would be required to viably deliver travelling showpeople's plots. While the allocation requires that VSC be met to release the GB on the area of the site outside the boundary inset. It is considered that both the Travelling Showpeople Accommodation and the employment floorspace both represent VSC. The VSC case for the travelling showpeople accommodation is underpinned by the pressing need for this type of accommodation – as recognised by the NPPF at a national level and the London Plan and GTNA at a regional level.</p> <p>Given the underdelivery against need in the Borough and the poor standard of accommodation, it is considered that the delivery of Travelling Showpeople Accommodation is VSC.</p> <p>The need for industrial floorspace, in combination with an inability to identify additional floorspace through DtC means that the industrial use is considered to fulfil the VSC criteria.</p> <p>The respondent questions the use of a VSC-led approach in general as it may prejudice the deliverability of the site. They request that the wider site within their ownership be released from the GB and that the Local Plan acknowledges the case for VSC. They also argue that the site fulfils the requirements of a grey belt definition.</p> <p>The respondent outlines their concept scheme for the site.</p>	<p>Comments noted. As a point of correction, the Hounslow GTTS SACA Addendum is not a needs assessment, but is a land availability assessment for Gypsy and Traveller and Travelling Showpeople sites. In context, the need figures referred to in the representation are for pitch/plot needs over the entire plan period (21 years), however, the London Plan 2021 (ADP1) requires boroughs to set 10 year pitch and plot targets, and the National Planning Policy for Traveller Sites requires Local Plans to identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets and identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15. It should also be noted that the emerging Local Plan allocates a total of 32 pitches and plots, and not a supply of 27 pitches which is stated in the representation by Chrisfys Properties Ltd.</p> <p>It should be noted that Hounslow's Local Plan considers that exceptional circumstances exist to release an area of the site for the delivery of 12 travelling showpeople plots to meet the needs of the community identified in the West London Gypsy, Traveller and Travelling Showpeople Accommodation</p>

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				<p>Assessment Final Report (2019) (Document EBSC5), at site allocation ref 121. The Council does not consider that exceptional circumstances are demonstrated for the release of the rest of the site from the Green Belt, beyond the portion of the site proposed to meet the need for Travelling Showpeople.</p> <p>A Statement of Common Ground in relation to site allocation 121 has been agreed and signed between the Council and Chrisfys Properties Ltd. As agreed in the Statement of Common Ground, the Council suggests three proposed modifications to site allocation ref 121. These are set out in Document EX57 under reference numbers: HLP_SA121_0 1; HLP_SA121_0 2; HLP_SA121_0 3.</p>
		<p>Environment Agency</p>	<p>Historic landfill Land South of Bedfont Road is next to the Bedfont Lakes North East historic landfill. The historic landfill database indicates that inert waste was deposited between 1949 and 1981. The comments included a comment of 'Organic'. The site was unlicensed. Land South of Bedfont Road is opposite the Boyers Dean Jesmond historic landfill EAHLD11027. The historic landfill database indicates that inert, commercial and household waste was deposited between 1949 and 1973. The included waste comments are demolition, metal and clinker. The site</p>	<p>Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.</p>

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			<p>reviews in November 2021 and raised strong opposition to the proposed treatment of Green Belt. FORCE welcome the scaling back of the land proposed to be removed from the Green Belt in the current Reg 19 draft Local Plan but are disappointed as a very significant quantum of open space is proposed to be allocated for development and this is not justified by sufficient evidence. FORCE strongly object to Site Allocations: 57 Land at Hatton Fields; 48: Vacant Land at Dick Turpin Way; 46: Ron Smith Recycling, Green Lane; 77: Land South of Western International Market; and 122: Rectory Farm. FORCE consider the proposals to be unsound for a number of overarching reasons set out in their representation.</p>	<p>to parkland. Neither of these uses are inappropriate development in the Green Belt.</p>
		<p>CPRE</p>	<p>Proposal to create an underground development is objected to. The site should retain Green Belt protection and it fulfils an important purpose ecologically.</p>	<p>Comment noted. The plan proposes to retain this site within the Green Belt. The allocation is for minerals extraction followed by restoration to parkland. Neither of these uses are inappropriate development in the Green Belt.</p>
		<p>Environment Agency</p>	<p><u>Mineral extraction schemes and groundwater</u> Mineral extraction schemes have the potential to cause adverse impact to groundwater quality as well as the physical disturbance of aquifers and groundwater resources. In this instance the schemes may have adverse impacts on groundwater resources within the shallow Principal gravel aquifers in the borough. Developers of mineral extraction schemes should:</p> <ul style="list-style-type: none"> • Engage with the Environment Agency’s Pre-Application Planning Advice Service in order to discuss requirements for the development of such sites. • Ensure developments adhere to the Position Statements outlined in Section N (Groundwater 	<p>Comments noted. It is considered that the detailed advice provided would be more applicable to inform scheme design and decision-making at application stage. Given the EA are a statutory consultee and will be consulted again at application stage, and that the EA standing advice/guidance may well change in the interim, we do not propose any modifications to the Plan in relation to this.</p>

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			<p>Resources) of the Environment Agency’s Approach to Groundwater Protection. This section indicates the supporting risk assessments that must supplement any planning application for mineral extraction schemes.</p> <ul style="list-style-type: none"> • Developers should contact the Environment Agency to discuss any permitting requirements for mineral extraction schemes. We recommend that the developer considers parallel tracking the planning and permit applications as this can help identify and resolve any issues at the earliest opportunity. Parallel tracking can also prevent the need for post-permission amendments to the planning application. We would welcome a joint discussion with the applicant and planning authority to discuss this further. • Subsequent infilling of the sites once mineral extraction has been completed must not have any adverse impacts to groundwater quality or quantity. Again, we would recommend that the Environment Agency are contacted in the future to discuss requirements for such a development. 	
123	1-83 High Street, Hounslow	TfL	<p>Given the site PTAL of 6a/6b and the location in Hounslow town centre the London Plan would require retail and residential development to be car free. There should be amendments to the movement and access section to reflect this as follows: ‘Development should seek to limit car parking on the site to the minimum necessary and any re-provided car parking should be clearly justified as public parking to serve the town centre as a whole. maintain an appropriate level of car parking to serve the town centre based on This should take account of current levels of use of all town centre</p>	<p>Minor modification partially agreed with as it provides greater clarity to the movement and access section of the site allocation. The commercial element of the site allocation will include uses that will require car parking provision.</p> <p>LBH note a small typo in the proposed modification text in the schedule document (S11⁶⁵) submitted alongside the draft Local Plan (i.e. should be ‘re-</p>

⁶⁵ [S11 - Schedule of Suggested Modifications](#)

Site allocation reference	Address	Regulation 19 representor	Issues raised in objection by Regulation 19 Representors	LBH response to comment
			<p>car parks and targets for mode share expected levels of demand. Development is to conform to the maximum parking standards in the London Plan while maximising access by walking, cycling and public transport. Residential and retail development is to be car free except for provision of disabled persons parking'</p>	<p>provided', not 'pre-provided') and will raise this at the appropriate time with the Inspectors.</p> <p>The following modifications are proposed to the Movement and Access section:</p> <p>"Development should seek to limit car parking on the site to the minimum necessary and any pre provided parking should be clearly justified as public parking to serve the town centre as a whole. maintain an appropriate level of car parking to serve the town centre based on current levels of use of all town centre car parks and expected levels of demand:</p> <p>Residential development is to be car free except for provision of disabled persons parking and necessary operational parking.</p> <p>(EX57: HLP_SA123_01)</p>