

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

Matter 11 - Implementation and Monitoring

April 2026



**London Borough
of Hounslow**

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

Matter 11 Implementation and Monitoring

Issue: Whether the Plan would be able to be monitored effectively to ensure timely delivery of its proposals and be in general conformity with the London Plan?

Questions:

Q1) How would the implementation of the Plan policies be achieved? What mechanisms are there to assist development sites to come forward/progress?

Q1) LBH response:

1. The Hounslow Local Plan 2020-2041 (**Documents S1¹ and S1a²**, henceforth 'the Plan') is a positively prepared and delivery focused development plan document. As set out in the Spatial Strategy chapter, under the sub-heading 'Delivery', the core objective of the Plan is to ensure that the optimisation of housing and other development requirements to meet identified needs can be facilitated whilst also delivering sustainable development. In this way, the plan seeks to secure "... *the provision of sufficient infrastructure to support growth; provid[e] space for the borough's growing economy and places for people to work; ... a high quality of design to provide a high living standard and enhance the borough's context and character; protecting and enhancing open space to meet the needs of the borough's growing population; and environmental protection including mitigating and adapting to climate change and addressing flood risk*" (please see paragraph 2.35).
2. The Plan also seeks to deliver on the Mayor's good growth objectives set out in the London Plan 2021 (**Document ADP1³**, policies GG1-GG6), and sets out a spatial strategy to deliver the growth potential of the borough's two Opportunity Areas (OA): the 'Great West Corridor' OA and the Hounslow portion of the Heathrow OA (also known as the 'West of Borough' area).

¹ S1 [Hounslow Local Plan 2020-2041 Proposed Submission Version](#)

² S1a [Hounslow Local Plan 2020-2041 Proposed Submission Version: Chapter 12 - Site Allocations](#)

³ ADP1 [London Plan \(2021\)](#)

3. The implementation of the Plan policies will be achieved in the main through the development management and planning enforcement functions of the Council, with support from the Spatial Planning team. Plan policies are drafted in a clear and concise manner with explicit directions relating to which actions or requirements need to be taken by both the Council (i.e. those clauses under the heading ‘We will achieve this by...’) and developers (i.e. those clauses under the heading ‘We will expect developers to...’) to deliver the strategic policy approach. This follows the policy drafting approach taken in the adopted Local Plan 2015 (**Document ADP2**⁴), which has proven to be effective in decision making to date.
4. Effective decision-making is also supported by the Council’s pre-application advice service and Design Review Panel (as promoted in Policy CC2, clauses E and GG), which aim to provide additional advice and guidance to proposals prior to an application being submitted. Policy advice is provided by officers from the Spatial Planning team both to development management officers during regular ‘majors’ meetings and design surgeries, and to developers directly through the pre-application service. While these services are discretionary, they can help to ensure that development proposals have been developed in line with policy requirements, and as such that Plan policies will be implemented successfully.
5. The Council also has well-established Regeneration and Inward Investment teams, which play a delivery-focused and enabling role in the implementation of the Council’s Local Plan. Their role can be seen as complementary to the Council’s statutory planning function, focusing on delivery and potential interventions required to bring allocated sites forward, such as partnership working. An example of this is the new trailblazing public sector partnership between the Council, the Ministry of Defence and the Greater London Authority to bring forward the regeneration of the MOD site in Feltham (Site Allocation 64: MOD Feltham).
6. Further guidance in relation to policy implementation is provided in a number of existing Supplementary Planning Documents (SPDs). Following modifications proposed to address issues raised during the Stage 1 hearings (and discussed further in **Document**

⁴ ADP2 [Adopted Hounslow Local Plan Volume 1 2015-2030](#)

EX49⁵), the Plan would also provide for the production of new non-statutory guidance to support the interpretation of policies, as well as the potential for new Supplementary Plans to be undertaken as per the new plan-making system (see Policy IMP3 clause C, and proposed modifications set out in **Document EX57**⁶, modification code EiP_C11_01).

7. The Plan commits the Council to strategic cooperation with key stakeholders including the Mayor of London, adjoining boroughs, statutory consultees and infrastructure providers (see Policy IMP3 clauses A, D, H, I and J). This also involves specific engagement with utilities providers and other stakeholders involved in infrastructure delivery in order to update and deliver necessary infrastructure projects set out in the Infrastructure Delivery Plan (clauses A, B and J – see also **Document EBID1**⁷).
8. The main mechanisms to assist development sites to come forward and progress toward delivery are set out in the following policies and clauses:
 - In principle support for development proposals on allocated sites where these accord with proposed uses and minimum development quanta set out in site allocations (see policy IMP2 clauses A, E and F);
 - A suite of existing SPDs, plus option to produce new non-statutory planning briefs and masterplans for site allocations, as well as other relevant guidance (policies IMP2, clause B and IMP3 clause C)
 - Consideration for using the Council’s powers relating to compulsory purchase orders (CPOs) for land assembly and securing rights over land to support regeneration and the delivery of critical infrastructure where appropriate (Policy IMP2, clause C);
 - A proactive approach to addressing barriers to delivery (Policy IMP2, clauses D, G and H); and
 - A focus on infrastructure delivery to support growth (policy IMP3 clauses A, B, H, I, J, K, L, M, N).

⁵ EX49 – [Note on Revised approach to address limitations on Supplementary Planning Documents](#)

⁶ EX57 – [Post Stage 1 Hearings Version of the Schedule of Suggested Modifications \(S11\)](#)

⁷ EBID1 [Hounslow Infrastructure Delivery Plan \(May 2025\)](#)

9. The Council considers that the above package of measures offers an effective and justified approach to supporting the implementation of Plan policies and site allocations.

Q2) Is the inclusion of Policy IMP1 justified, given that there is a specific approach to sustainable development that is already provided in national policy?

Q2) LBH response:

10. The Council considers that the inclusion of Policy IMP1 is justified.
11. National policy sets out a clear presumption in favour of sustainable development and establishes the principles for plan-making and decision-taking (NPPF paragraphs 7–10, **Document ORD3⁸**). Policy IMP1 does not seek to reinterpret this national approach; rather, it signposts to national policy and explains how those principles will be applied through a plan-led framework at the local level and confirms that sustainable development underpins the Local Plan as a whole.

Q3) How would the implementation of the Plan be monitored? Would it be effective?

Q3) LBH response:

12. The implementation of the Plan will be monitored through the Implementation Monitoring Framework set out in Appendix 1 of the Local Plan. This framework establishes how the delivery of policies will be tracked over the Plan period, linking relevant policies and objectives to key relevant performance indicators (KPIs), targets and target dates.
13. Monitoring will be undertaken through the Council’s Authority Monitoring Report (AMR), as set out in clause G of Policy IMP3, which commits the Council to publishing monitoring outcomes and analysis, and reviewing policies where they are not achieving their intended aims. This approach enables the early identification of any policies that

⁸ ORD3 [National Planning Policy Framework December 2023](#)

are not performing as intended and allows for appropriate policy review to be undertaken where necessary. Paragraph 11.6 further confirms that Authority Monitoring Reports and updated evidence will support the ongoing 'plan, monitor and manage' approach.

14. This is in line with Section 113 of the Localism Act 2011 which requires local planning authorities to prepare an Authority Monitoring Report, to help to assess the implementation and effectiveness of the Local Plan.

15. Taken together, this approach is effective as this provides a clear and justified mechanism for assessing whether the Plan is being delivered over the plan period as intended, and for identifying when policy review or intervention may be required.

Q4) How would the results of monitoring in Appendix 1 of the Plan be acted upon, for example what would trigger a review of the Local Plan, the West London Waste Plan and the CIL Charging Schedule as indicated in Policy IMP3? How would the scope of those reviews be determined?

Q4) LBH response:

16. As discussed in relation to question 3 above, the Council will monitor the implementation of the Plan through the monitoring framework and through the production of AMRs. The analysis undertaken and presented in the AMR will help to determine whether the strategic objectives set out in the Plan are being met and whether any policy amendments or more substantial strategic changes are required to address this.

17. Policy IMP3 clause F articulates in policy terms the statutory requirements to undertake a regular review of the Plan (as well as other key development plan documents) as required by regulations (see Council response to Question 3 above).

18. It should be noted that the joint West London Waste Plan 2015 (or WLWP, **Document ADP4**⁹) is currently in the process of being reviewed and has undergone a Regulation 18 consultation in preparation for a Regulation 19 consultation on the proposed submission version, currently scheduled for the Summer of 2026. The new WLWP will set out its own monitoring framework which will include requirements for the monitoring of new WLWP policies, KPIs and details related to likely ‘triggers’ for review. In this sense, IMP3 clause F provides an overarching policy relating to the review of development plan documents, however there will be other considerations contained within specific development plan documents that inform policy monitoring and review processes.
19. Likewise, the CIL Charging Schedule, whilst not a development plan document, is a key delivery mechanism that helps to ensure that new infrastructure is provided in a timely way in order to support the planned level of growth set out in the Plan. It is anticipated that a review to determine whether or not the charging schedule should be updated will be undertaken following the adoption of the Plan, and this would be informed by the updated Infrastructure Delivery Plan (or any superseding document). Whilst the Local Development Scheme (or LDS, **Document ORD2**¹⁰) does not contain a production programme for the CIL Charging Schedule, this will be set out in a future plan production timetable (in line with the new plan-making framework).
20. Following comments made by the Inspectors during the Stage 1, Matter 2 hearing session relating to the proposed spatial strategy and strategic policies (which took place on Wednesday 14th January 2026), the Council has since presented a further suggested modification to Policy IMP3 clause F (please see **Document EX57**, modification code EiP_C11_02). The Council considers that this provides further direction on the potential external ‘triggers’, which would influence the decision to undertake an early or partial review of the Plan (specifically, the publication of a new London Plan and/or the approval of a Development Consent Order (DCO) for a new third runway at Heathrow Airport). For clarity, given the changes to the plan-making system introduced by the Levelling Up and Regeneration Act (LURA) 2023 and associated secondary legislation and regulations (particularly the transitional arrangements set out in Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions)

⁹ ADP4 [West London Waste Plan \(2015\)](#)

¹⁰ ORD2 [Local Development Scheme \(March 2025\)](#)

Regulations 2026¹¹), should a decision be made to review the Plan in light of any of the above mentioned events transpiring, this should be read as representing a decision by the Council to begin preparation of a ‘new-style’ plan under the new plan-making framework.

21. The scope of any review would therefore be informed by the requirements of the new plan-making framework and the progress of certain key external factors, which would influence the delivery of the strategic objectives and spatial strategy of the Plan. This process would also be informed by the results of regular monitoring of policy effectiveness set out in the monitoring framework, which would be reported through the production of future AMRs.

¹¹ The Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026, accessed: <https://www.legislation.gov.uk/uksi/2026/169/made#top>