

LB Hounslow response to the London Plan Consultation

2nd March 2018

1. Overall Response

1.1 LB Hounslow welcomes the opportunity to comment on the draft London Plan and to work with the Mayor and his team to shape its content as it moves towards adoption in 2019. LB Hounslow is a pro-growth borough, and we strongly support the Mayor's approach taken in the Plan. We particularly welcome the new 'Good Growth' approach, set out in Chapter 1 which aligns closely with our corporate priorities for good quality homes and jobs, a cleaner, greener borough, and active, healthy communities in the borough.

1.2 The approach taken by the plan in Chapter 2 (Spatial Development Patterns) closely reflects Hounslow's emerging Local Plan reviews which seek to deliver a significant increase in new homes and employment, by taking a comprehensive approach to challenging areas, to create places that people will enjoy working, living and choose to stay throughout their lives.

1.3 For these reasons, we strongly support and will aim to meet the increased 10-year housing target as set out in Chapter 4, and welcome the two Opportunity Areas (Heathrow and Great West Corridor) adopted in Chapter 2, as part of the Elizabeth Line West Corridor, to deliver a total of 20,500 new homes and 25,000 new jobs and we look forward to working with yourself to bring these forward rapidly through Opportunity Area Planning Frameworks.

1.4 Hounslow is committed to delivering unprecedented change through its Local Plan reviews and prepared to take on the challenge laid down by the Mayor to deliver a City for All Londoners.

1.5 However, if the Plan is to achieve the intended spatial development pattern, in such a way as to secure 'good growth', it must recognise that firstly, significant infrastructure investment for both connectivity and community, is needed to unlock this development, and this needs to be clearly established in both Chapter 5 (Social Infrastructure) and 10 (Transport). Secondly, the proposed approach to Green Belt land, set out in Chapter 8 (Green Infrastructure) should allow for flexibility in recognising that land which no longer meets the purposes of the green belt can contribute to good growth. Finally, the Plan must recognise the increasingly likely scenario of a third runway at Heathrow and take account of this.

2. Detailed Response

Chapter 1: Good Growth
Policy GG1 Building strong and inclusive communities
<i>LB Hounslow strongly support the Mayor's Good Growth approach outlined by policies GG1-GG6, these are mainly very laudable objectives.; please see overall response.</i>
Policy GG2 Making the best use of land
<i>LB Hounslow strongly support the Mayor's Good Growth approach outlined by policies GG1-GG6; please see over overall response. However, policy GG2 should recognise that where areas of the green belt which no longer fulfil their function, are located near to existing transport links and/or town centres, development may represent the best use of this land.</i>
Policy GG3 Creating a healthy city
<i>LB Hounslow strongly support the Mayor's Good Growth approach outlined by policies GG1-GG6, these are mainly very laudable objectives.; please see overall response.</i>
Policy GG4 Delivering the homes Londoners need
<i>LB Hounslow strongly support the Mayor's Good Growth approach outlined by policies GG1-GG6, these are mainly very laudable objectives.; please see overall response. and our response to chapter 4 (Housing).</i>
Policy GG5 Growing a good economy
<i>LB Hounslow strongly support the Mayor's Good Growth approach outlined by policies GG1-GG6, these are mainly very laudable objectives.; please see overall response.</i>
Policy GG6 Increasing efficiency and resilience
<i>LB Hounslow fully supports the Mayor ambition of helping London to become a 'zero carbon' city by 2050, ensuring that buildings are designed to adapt to a changing climate and creating a safe and secure environment that is resilient against emergencies, such as fire and terrorism.</i>
Chapter 2: Spatial Development Patterns
Policy SD1 Opportunity Areas
<i>LB Hounslow strongly supports the spatial development strategy outlined in Chapter 2, particularly with regards to the Heathrow Opportunity Area and Great West Corridor Opportunity Area.</i>
<i>The draft housing and employment (jobs) targets for these opportunity areas are challenging for the borough. To sustainability deliver this target there would need to be commitment to fund the infrastructure to support large sites in these areas. The London Plan policy on protection of Green Belt land should also be reviewed or consideration should be given to a flexible approach where land is no longer fit for green belt purposes. This approach could help boroughs such as Hounslow towards achieving the draft housing and employment (jobs) targets in the Opportunity Areas and also its 165% overall increase in housing target for the borough</i>

LB Hounslow supports the inclusion of the West London Orbital Line into the plan which could run-through the borough and improve accessibility for many residents and businesses. However, the London Plan should go further than this given that the recent benefits/cost ratio study indicates a strong case for the provision of the line. The Plan should provide a commitment from the Mayor of London and Transport for London to work with the Council in prioritising the funding and delivery of the line.

The LB Hounslow is currently in the advanced stages of a proposal for the reopening of the freight line between Southall and a new station at Brentford (Golden Mile) for passenger shuttle services. The line would provide a direct link between the Great West Corridor (which includes the Golden Mile), and the Southall Opportunity Area and associated Crossrail connections, due in 2019.

The Brentford- Southall Crossrail link and Golden Mile Station and a proposed Southern Rail Access link with a station at Bedfont will help meet the good growth objectives of the emerging London Plan and are crucial to unlocking the development potential of the Great West Corridor and Heathrow Opportunity Areas. These infrastructure investments will contribute significantly to the Borough meeting not only its London Plan Housing Target of 21,820 new homes but also the Opportunity Areas requirements for the delivery of 20,500 new homes and 25,000 new jobs.

LB Hounslow considers that more detailed policies should be included in the new London Plan to cater for the increasingly likely scenario of a third runway. LB Hounslow is working closely with other local authorities and relevant agencies in close proximity to the airport and going well beyond the boundaries of Greater London through the 'Heathrow Strategic Planning Group' (HSPG). Participating authorities have agreed an 'Accord' and a 'Statement of Agreed Outcomes' as the basis of any continuing participation. We would urge the Mayor to also get much more involved in assessing both the opportunities and challenges posed by the airport – both now and in the future – and to work collaboratively with the HSPG too.

Policy SD2 Collaboration in the Wider South East

LB Hounslow supports this policy, but feel that it could be made more effective by recognising that many Outer London Boroughs have stronger connections to the Wider South East than the CAZ, and by making explicit reference to the potential expansion of Heathrow. Please see our overall response.

Policy SD3 Growth locations in the Wider South East and beyond

LB Hounslow supports this policy

Policy SD4 The Central Activities Zone (CAZ)

LB Hounslow supports this policy

Policy SD5 Offices, other strategic functions and residential development in the CAZ

LB Hounslow supports this policy

Policy SD6 Town Centres

LB Hounslow supports this policy

Policy SD7 Town Centre Network

LB Hounslow supports this policy

Policy SD8 Town centres: development principles and Development

LB Hounslow supports this policy

Policy SD9 Town centres: Local partnerships and implementation

LB Hounslow supports this policy

Chapter 3: Design**Policy D1 London's form and characteristics**

LB Hounslow supports the policy approach to design in the London Plan to create sustainable and liveable places.

However, the wording of policy D1 (b) conflicts with Policy H2(b) which requires that Boroughs recognise the evolving and changing character of areas. This contradiction may compromise the ability to deliver development on small sites; this is further contradicted by the justifying text to Policy D6 where 3.6.1 identifies that growth in London will need to be accommodate through developing at densities that are above those of the surrounding area on most sites. The Borough's emerging Local Plan Reviews explicitly recognise the importance of the creation of sustainable and liveable places and these form part of their approaches to accommodating growth and development that is people oriented and contextually appropriate.

Policy D2 Delivering good design

LB Hounslow supports the policy approach taken in D2 to visual representations, and design reviews, but feels that the policy should be clarified to so that design reviews do not become overly cumbersome, and should be set up to ensure the design review process is uniform across the city.

LB Hounslow supports the approach to Design Review panels. However, D2(d), does not clearly state who is responsible for bringing forward design codes and masterplanning work. While there may be times where an applicant could bring these forward, the Borough feels that it needs to be clarified to state that codes not emanating from the council should be subject to approval by the Borough.

LB Hounslow supports the Mayor's approach to making the development management process more efficient, however the practicalities of ensuring design quality through to completion are unclear. The policy acknowledges the need to pursue design quality even in the current pressure to increase housing quantities. While this is important, the Council is concerned that the Policy is silent on refusing poor design. It is felt that at the bare minimum, the Policy should be more explicit about what is deemed good designed and this should be illustrated and annotated through examples.

Policy D3 Inclusive Design

LB Hounslow supports this policy

Policy D4 Housing quality and standards

LB Hounslow supports this policy

Policy D5 Accessible housing

LB Hounslow supports this policy

Policy D6 Optimising housing density

LB Hounslow supports the approach on optimising housing density. Policy D6 should set out the relationship between site specific analysis of appropriate density

and the policy's overarching principle that new and emerging development trends will be denser than the existing context. Overall the Council welcomes the density by design approach rather than the rigid SRQ density matrix and supports the approach of proportionate scrutiny related to the level of density promoted in a proposal. The Council also supports the introduction of management plans for high density schemes as it feels that this is a tool that can help address the gap between delivering well designed, high quality developments and their long-term maintenance.

Policy D7 Public realm

LB Hounslow supports this policy

Policy D8 Tall buildings

Policy D8 is strongly supported and the adopted Local Plan identifies the definition of a tall building in a Hounslow context and seeks to identify suitable areas where tall buildings can be located. The identification of tall buildings as integral parts of a plan led approach reflect the work currently undertaken by the Council with regards to the Great West Corridor – which, based on capacity studies has accordingly identified sites for tall buildings and their role within a visual and spatial hierarchy but their impacts on visual, environmental and functional issues.

Policy D9 Basement development

LB Hounslow supports this policy

Policy D11 Fire Safety

LB Hounslow supports this policy

Policy D12 Agent of Change

LB Hounslow supports this policy however this policy should not be limited to noise generating activities only.

Policy D13 Noise

LB Hounslow support this policy in principle, however we seek clarity on what mechanisms and criteria boroughs like Hounslow should use when separating new noise sensitive developments from major sources of noise, given our close proximity to Heathrow and road transport network whilst reconciling with ever increasing housing target.

Chapter 4: Housing

Policy H1 Increasing housing supply

LB Hounslow strongly supports the increased housing target as a borough with significant growth aspirations, the requirement for a delivery-focused development plan – see overall response.

While strongly supporting the approach taken in Policy H1, it is difficult to envisage how delivery rates can be significantly and immediately increased, without increasing PTAL through new transport infrastructure and identification of new sites and identified social infrastructure, in such a way as to allow any deficit occurring in the first five years to be met with a surplus beyond the target in the latter years, as this would indicate an extreme increase in demand for market homes and capacity within the development industry (including reduced costs). In addition, if these targets are not met, this could allow for development to come

forward in an unplanned ad-hoc way in less sustainable locations and in forms which conflict with the good growth objectives of the draft plan.

Policy H2 Small sites

While recognising that small sites can contribute to meeting London's housing need, LB Hounslow consider the approach taken by policy H2 to be poorly justified, with no evidence provided with the plan or in the evidence base to justify the extreme uplift in numbers of units expected on small sites (rising from 217/annum 2008/9-2015/6 to 680 units per annum target or a factor of 3.13). The wording of the small sites target does not make it clear whether we are expected to achieve the small sites targets as well as the large sites target (regardless of it being a component) or whether there is flexibility in how we achieve the overall target in the former case, we do not support this approach and would instead recommend flexibility, with boroughs setting their own small sites target through their housing trajectory in agreement with the Mayor.

When considering this policy alongside others in the draft plan, most notably the strong protections afforded to the green belt (G2), it creates a strong dissonance promoting development of extremely poorly accessible suburban housing locations while protecting green belt land which is no longer fit-for-purpose in more appropriate locations with access to infrastructure and amenities.

While a design-code based approach to small sites is welcomed, the policy needs to be supported with guidance on the form of these documents to ensure the effective, consistent, application across London.

Policy H3 Monitoring housing targets

LB Hounslow supports this policy

Policy H4 Meanwhile use

LB Hounslow supports this policy

Policy H5 Delivering affordable housing

We strongly support policies H5, H6 and H7 in creating a housing market that works better for all Londoners through the delivery of more homes, a strategic target of 50% affordable housing and homes that meet high standards of design. Hounslow Housing Market assessment has identified a demand for 1898 homes of which 48% need to be truly affordable.

Policy H6 Threshold approach to applications

LB Hounslow supports this policy see above

Policy H7 Affordable housing tenure

LB Hounslow supports this policy. However, we consider that setting out a defined tenure split at the regional level represents an overly inflexible approach which neglects local need for a range of affordable housing as set out in borough strategic housing market assessments. Hounslow has been successful in securing and delivering a high level of affordable housing over the previous period despite challenging market conditions and believe that a loss of flexibility in boroughs which achieve high levels of affordable housing may limit their ability to continue this track record in the future.

Policy H8 Monitoring of affordable housing

LB Hounslow supports this policy

Policy H9 Vacant building credit

LB Hounslow supports this policy

Policy H10 Redevelopment of existing housing and estate regeneration

<i>LB Hounslow supports this policy</i>
<p>Policy H11 Ensuring the best use of stock <i>Policy H11 should provide greater emphasis on planning for size mixes reflecting identified local need, and in terms of HMOs, take account of the challenge and potential problems caused by this type of housing, especially in suburban environments.</i></p>
<p>Policy H12 Housing size mix <i>LB Hounslow supports this policy</i></p>
<p>Policy H13 Build to Rent <i>LB Hounslow strongly support the clarification provided by policies H13, 14, 15, 16, 17 and H18 on other tenure types. However, consideration should be given to ensuring that policy H13 is well regulated so as to ensure they do not provide exploitative and result in poor quality accommodation and its implications on community cohesion and place making.</i></p>
<p>Policy H14 Supported and specialised accommodation <i>LB Hounslow supports this policy see above</i></p>
<p>Policy H15 Specialist older persons housing <i>LB Hounslow supports this policy see above</i></p>
<p>Policy H16 Gypsy and Traveller Accommodation <i>LB Hounslow supports this policy see above</i></p>
<p>Policy H17 Purpose-built student accommodation <i>LB Hounslow supports this policy see above</i></p>
<p>Policy H18 Large-scale purpose-built shared living <i>LB Hounslow supports this policy see above</i></p>
<p>Chapter 5: Social Infrastructure</p>
<p>Policy S1 Developing London's social infrastructure <i>LB Hounslow strongly supports the recognition of social infrastructure as critical to delivery of Good Growth and would encourage the Mayor to support boroughs in enabling the delivery of chapter 1 through investment in social infrastructure to unlock housing and jobs. Figure 2.19 in the plan shows the proximity of pockets of deprivation to the OAs which add to the need for support from GLA on infrastructure investment - see overall response.</i></p>
<p>Policy S2 Health and social care facilities <i>LB Hounslow supports this policy</i></p>
<p>Policy S3 Education and childcare facilities <i>Policy S3 should place greater emphasis on school place planning over school facility planning to ensure need can be met through both expansions of existing facilities as well as the creation of new facilities; the policy should also make specific reference to travel management plans in development proposals for new educational and care facilities, in order to reflect the predominance of car travel due to much poorer public transport infrastructure in outer London especially radial linkages.</i></p>
<p>Policy S4 Play and informal recreation <i>LB Hounslow supports this policy</i></p>
<p>Policy S5 Sports and recreation facilities <i>Policy S5 should require consideration of traffic demand management of playing pitches should be referenced in this policy, as playing pitches can contribute to</i></p>

increased flows of traffic (both motor traffic and public transportation) during use, especially for large playing pitches in areas of poor public transport accessibility.

Policy S6 Public toilets

LB Hounslow supports this policy

Policy S7 Burial space

LB Hounslow supports this policy

Chapter 6: Economy

Policy E1 Offices

LB Hounslow welcomes the recognition in the plan to the importance of business parks such as Chiswick Park and Bedfont Lakes in our borough for consolidation, extension and investment in sustainable transport infrastructure.

LB Hounslow strongly supports policy E1 for protection and increase of office space and the reuse of surplus office space for affordable workspace, and this is reflected in the Draft Local Plan Reviews. LBH is a pro-growth borough and we strongly support to principle of mixed use development to boost housing and jobs in a way that ensures that people can live and work in the borough - please see our overall response.

Policy E2 Low-cost business space

LB Hounslow supports this policy

Policy E3 Affordable workspace

LB Hounslow supports this policy

Policy E4 Land for industry, logistics and services to support London's economic function

LB Hounslow supports the policy approach however there are concerns that the evidence base has only assumed 'trend' growth in air freight / Heathrow. Recent growth in air cargo 'related logistics far exceeds trend and projections for 2 Runway and 3 Runway future go further.

Further work needed. GLA should constructively engage with joint work led by HSPG and WLA to assess in more detail.

Policy E5 Strategic Industrial Locations (SIL)

LB Hounslow strongly supports policies E5-E8 in unlocking redevelopment of industrial areas, but these policies should make clearer reference linking improved public transport accessibility levels with potential for development. This is principally due to the fact many larger industrial locations are often particularly poorly served by frequent commuter services.

Policy E6 Locally Significant Industrial Sites

LB Hounslow supports this policy see above

Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function

LB Hounslow supports this policy see above

Policy E8 Sector growth opportunities and clusters.

LB Hounslow supports this policy see above

Policy E9 Retail, markets and hot food takeaways

LB Hounslow supports Policy E9 and would particularly like to enforce restrictions relating to the proximity of primary schools to A5 classed hot food takeaways.

Policy E10 Visitor Infrastructure

LB Hounslow supports this policy

Policy E11 Skills and opportunities for all

LB Hounslow supports the intention in the draft London Plan, through policy E11, to develop an effective and responsive skills system through the Skills for Londoners Programme. In particular, we welcome the intent to work across borough boundaries to coordinate activity, share data, and to develop a more consistent approach to making use of S106 funding to deliver a skills system that London and Londoners need.

Chapter 7: Heritage and Culture**Policy HC1 Heritage conservation and growth**

LB Hounslow supports approach taken by the plan to protecting heritage and culture, with particular reference to the concept of incremental change this is particularly relevant for Hounslow given its proximity to Kew Gardens World Heritage Site.

Policy HC2 World Heritage Sites

While LB Hounslow supports the overall approach in policy HC2, it is challenging to reconcile the significant uplift in housing and employment set out in the Great West Corridor Opportunity Area with greater emphasis on buffer zones and views than before. It is considered a specific World Heritage Policy should now be devised.

Policy HC3 Strategic and Local Views

LB Hounslow supports this policy

Policy HC4 London View Management Framework

LB Hounslow supports this policy

Policy HC5 Supporting London's culture and creative industries

LB Hounslow supports this policy

Policy HC6 Supporting the night-time economy

LB Hounslow supports this policy

Policy HC7 Protecting public houses

*LB Hounslow supports the approach taken by the plan to managing London's Heritage and Culture in a way which compliments growth.
Policy HC7 should clearly define what authoritative marketing evidence means in the case of public houses. The use of pubs as a contributor to town centre regeneration is supported.*

Chapter 8: Green Infrastructure and Natural Environment**Policy G1 Green infrastructure**

LB Hounslow strongly supports the approach taken in the draft plan to green infrastructure and, as a borough with a large number of historic parks, green spaces and sports facilities we feel the approach effectively supports the growth objectives of the plan. However, the policy could be improved by ensuring Green Infrastructure Strategies take account of the need for learning and development to respond to the growing number of schools which are building on their green space to cope with increasing pupil numbers and academy schools, which have no requirement to provide green space. In both cases this means that schools need to ensure they have regard to making best use local green spaces for outdoor learning and activity.

Policy G2 London's Green Belt

LB Hounslow considers that the Green Belt policy is unsound by virtue of developing an inflexible approach that does not mirror the National Planning Policy Framework (NPPF), which sets out the principle that Local Planning Authorities should review their Green Belt boundaries through Local Plan review process to ensure it meets the purposes. Please see our overall response.

The London Plan policy on protection of Green Belt, as currently drafted, represents a significant challenge in delivering on the 'good growth' and spatial development patterns set out in the plan, by heavily constraining the ability of Boroughs to develop a sustainable approach to meeting growth in housing and employment envisaged by the plan, and in the areas expected. If these objectives are to be met, the policy should, reflect national policy, allow a level of flexibility, by recognising that Green Belt Reviews allow for land that is no longer fit for green belt purposes to be used efficiently to help boroughs achieve growth.

In particular, a flexible approach should be given within Opportunity Areas which contain green belt and align with major regional and national infrastructure such as Heathrow airport, to ensure the plan takes a long-term view of sustainable expansion and economic growth. It is useful to note that Heathrow airport expansion consultation proposes similar development in some of Hounslow Green Belt land that are not fit for purpose to enable Airport related development such as Hotels, Offices and Industry and Warehousing.

Policy G3 Metropolitan Open Land

LB Hounslow supports this policy G3 and believes that additional reference should be made to education opportunities afforded by this space.

Policy G4 Local Green And Open Space

LB Hounslow supports this policy approach although the policy should also ensure that satisfactory arrangements are in place for local green and open space to be managed and maintained to ensure the benefits are sustainable. Furthermore, it should include protection for all green space under the categories of District Parks, Local Parks and Open Spaces, Small Open Spaces, Pocket Parks and Linear Open Spaces listed in Table 8.1 – Public open space categorisation along with Commons and London Squares.

Policy G4 should be amended as follows:

Policy G4 ~~Local~~ Other green and open space

A ~~Local~~ All green and open spaces should be protected.

C Boroughs should undertake a needs assessment of ~~local~~ all green and open spaces to inform policy.....

In relation to Paragraph 8.4.3, the Council strongly supports the move to secure appropriate management and maintenance of open spaces in places of deficiency, especially Privately Owned Public Space and suggest that you cross reference this to Policy D7 G Public Realm and the Public London Charter.

In relation to Table 8.1 on Public open space categorisation, the Council believes that in light of the draft Environment Strategy's cognisance of the importance of quality green space and our better understanding of the value of green space

through Natural Capital Accounting, this table needs a thorough revision. Its focus is on the size and proximity from homes is a good start. We propose that a column is added that lists the multiple benefits or functions of these open spaces.

Policy G5 Urban Greening

LB Hounslow broadly supports this policy approach.

Policy G6 Biodiversity and access to nature

LBH broadly supports this policy. The Local Plan identifies green and blue corridors and sets out policies for protecting and increasing access to them.

We suggest that Para B1) should be altered as follows:

Policy G6 Biodiversity and access to nature

B 1) use the relevant procedures to identify SINC~~s~~ and ~~green~~ ecological corridors...

Policy G7 Trees and woodlands

LB Hounslow broadly supports this policy.

Policy G8 Food growing

LB Hounslow supports the protection of allotments and agricultural land in the Local Plan, and believes that provision of growing space/community gardening should be encouraged in existing green spaces not just new developments.

Therefore, LBH suggests the following wording:

Policy G8 Food growing

A 1) protect existing allotments and encourage provision of space for community gardening, including for food growing, within existing and new developments.

Policy G9 Geo-diversity

LB Hounslow is concerned with the lack of a a policy that recognises the importance of addressing the health and environmental risks posed by land contamination as part of developing a growing city. Its absence is also inconsistent with information set out in the evidence base documents (See IIA and Scoping report comments above) for the draft new London Plan. It is recommended at the very least the current London Plan policy for ‘Contaminated Land’ and supporting text is reinstated.

Chapter 9: Sustainable Infrastructure

Policy SI1 Improving air quality

LB Hounslow welcomes the renewed focus on ensuring air quality is improved and its impact mitigated. As a borough with major transport links (the A4 and M4) and Heathrow, we strongly support efforts to improve air quality through the air quality focus areas. In this regard, we have noted that the M4/A4 corridor is highlighted as a Focus Area throughout Hillingdon, and through Hammersmith and Fulham to central London, but only in part through Hounslow. Given the nature of this road transport corridor, this distinction is questionable: action taken on one section of the road will also affect other sections, and it would thus seem logical and appropriate to deal with this corridor as a single air quality focus area. Also, from information given in Policy SI1, it’s not clear what strategic measures, other than ULEZ that does not include North/South circulars, and funding would the Mayor

provide to reduce exposure of harmful pollutants from traffic on A4 that impact some of our schools.

However, it must be recognised that the significant quantum of growth envisaged by the plan for Hounslow will, without significant transport infrastructure investment, lead to a scenario of increased air pollution – see our overall response.

Policy SI2 Minimising greenhouse gas emissions

LB Hounslow supports this policy

Policy SI3 Energy Infrastructure

LB Hounslow supports this policy

Policy SI4 Managing heat risk

LB Hounslow strongly supports policies to ensure that development is more environmentally sustainable and supports building resilience to Climate Change. However, policy SI4 could be improved by making explicit reference to these effects being mitigated throughout the lifetime of the development, as so: “B) Major development proposals should demonstrate through an energy strategy how they will reduce the potential for overheating and reliance on air conditioning systems, over the lifetime of the development in accordance with the following cooling hierarchy:”

Policy SI5 Water infrastructure

LB Hounslow support the objectives of the policy, but are slightly confused by there being two sections (C and E) which set out the requirements for developments. These should be merged or a clear justification given for their order.

Policy SI6 Digital connectivity infrastructure

LB Hounslow supports this policy

Policy SI7 Reducing waste and supporting the circular economy

LB Hounslow supports this policy

Policy SI8 Waste capacity and net waste self sufficiency

LB Hounslow supports this policy

Policy SI9 Safeguarded waste sites

LB Hounslow supports this policy

Policy SI10 Aggregates

LB Hounslow supports this policy

Policy SI11 Hydraulic fracturing

LB Hounslow supports this policy

Policy SI12 Flood risk management

LB Hounslow supports this policy

Policy SI13 Sustainable drainage

LB Hounslow supports this policy

Policy SI14 Waterways - strategic role

LB Hounslow supports this policy

Policy SI15 Water transport

LB Hounslow supports this policy

Policy SI16 Waterways - use and enjoyment

LB Hounslow supports this policy

Policy SI17 Protecting London's waterways

LB Hounslow supports this policy

Chapter 10: Transport

Policy T1 Strategic approach to transport

LB Hounslow strongly supports the approach to transport outlined in the plan and the objective of a strategic approach to improvement. However, without an increase in support, and funding for the major transport interventions identified in the Local Plan Reviews, that is, the Southall-Brentford Crossrail Link, West London Orbital link, and the Feltham Southern Rail Access to Heathrow, with a station at Bedfont, as well as smaller scale interventions such as increased bus service, this policy will not be deliverable. This will be exacerbated given the increase in expected housing delivery with the new London Plan housing targets for Hounslow.

Policy T2 Healthy streets

LB Hounslow supports this policy, and has integrated similar policy direction within the 2015 Local Plan, and the Local Plan Reviews for the Great West Corridor and West of Borough area. Within the Borough there are two Opportunity Areas, the Borough supports the promotion of embedded sustainable transport networks being a critical part of the growth of these areas. As mentioned in the response Policy T2 sustainable transportation options and healthy street design is critical to the successful delivery of these opportunity areas and the Borough overall.

Policy T3 Transport capacity, connectivity and safeguarding

LB Hounslow supports the upgrading and expansion of the TfL network throughout London, and has advocated for an expanded bus network within Hounslow and additional rail connections through the 2015 Local Plan and Local Plan Reviews. LBH would like to see increased connections to Crossrail, such as the Southall Crossrail Link included in Table 10.1 as this scheme is critical to the delivery of the Great West Corridor Opportunity Area. LBH supports the delivery of a southern rail access route to Heathrow, however our preferred route is through Feltham with a station at Bedfont. This alignment would significantly increase the accessibility of this area and provide critical infrastructure to support the growth within the Heathrow Opportunity Area. In principle, the Borough supports bus transit pilots in two opportunity areas to help mitigate potential impacts to road congestion as a result of increased growth. It is important that the contribution to the delivery of strategic infrastructure schemes is supported by development proposals, both in design and through economic contributions.

Policy T4 Assessing and mitigating transport impacts

LB Hounslow supports this policy. The Borough requires a Traffic Assessment and Travel Plan to be submitted with planning applications. In addition to this, the Borough is carrying out two comprehensive traffic assessments to provide an evidence base to the Local Plan Reviews of the West of Borough area and the Great West Corridor. LBH would like to see a reference to the importance of traffic reduction and increase accessibility in this policy as it is a key component of mitigating the impact of development on the transport network.

Policy T5 Cycling

LB Hounslow supports this policy in principle as it aligns with the Borough's promotion of sustainable transport within Hounslow but there are concerns about implementation borough wide. Many parts of the borough are not very accessible by bicycle and we are concerned about a requirement to provide high numbers of cycle parking that would not be used, leading to reputational issues, ineffective use of sites, and a lowering in the quality of cycle parking. Clarification is needed on

the higher minimum cycle parking standards designation (Figure 10.2). It is unclear whether this designation applies to the entire borough, or is applicable where appropriate (such as town centres) and major commercial areas as per 10.5.4. it should be made clear in the policy that the higher cycle parking standard would only apply to areas where there is good quality cycle infrastructure and accessibility.

Policy T6 Car parking

LB Hounslow supports the general approach to reducing car orientated infrastructure such as car parking to encourage a shift towards sustainable transportation. The PTAL rates across the Borough are variable with some areas, such as town centres, well connected to public transport, while other areas have little transport infrastructure. In these areas, a car-free development approach will not be appropriate until public transportation is improved, especially in residential family housing. The Council requests that more flexibility is written into policy to allow for area specific need. More information is requested regarding the Car Park Design and Management Plan.

Policy T6.1 Residential parking

LB Hounslow supports the policy. Please see response to Policy T6 for queries regarding minimum/maximum allowable car spaces for Outer London developments.

Policy T6.2 Office parking

LB Hounslow generally agrees with encouraging sustainable transportation through restricted parking provisions in areas where public transportation levels are high. In response to T6.2B not all Opportunity Areas are well served by public transportation, such as the two areas in Hounslow. Until game changing infrastructure, such as the Southall Crossrail Link, the West Orbital line with a station at Lionel Road, and the Southern Rail Access link with a station at Bedfont, are provided Hounslow's Opportunity Areas remain under served by the public transport needed to support growth. In these areas car-free development may not be appropriate.

Policy T6.3 Retail parking

LB Hounslow has concerns that this policy could lead to significant levels of parking within town centres or other well connected areas in outer London where we want to minimise levels of retail parking. There should be differentiation to discourage developers from coming forward with proposals for too much parking.

Policy T6.4 Hotel and leisure uses parking

LB Hounslow agrees with the case-by-case analysis of parking need in areas with low PTAL as the provision of public transport varies across the Borough. There is concern, however regarding how the requirements for coach parking are determined? From experience this is usually an area that is under-planned, having more concrete guidelines from the Mayor would be beneficial.

Policy T6.5 Non-residential disabled persons parking

LB Hounslow is concerned with the statement in the policy, that for any car free development "some blue badge parking should be provided even if no general parking is provided". Clarification is required on whether this includes existing on-street disabled bays count, or take into account other permit bays where blue badge holders are able to park.

Policy T7 Freight and servicing

LB Hounslow supports this policy in principle. Policy T7 is supported, with the understanding that freight and logistics facilities are a core industry in the Heathrow Opportunity Area, and therefore Policy T7 A.1 may not be appropriate within the wider Opportunity Area outside of town centres. The Borough would like to see reference to the increasing freight traffic within London due to home servicing, as referenced in Section 10.7.2.

Policy T8 Aviation

LB Hounslow supports this policy in principle. The focus on air and noise pollution is of special importance to LBH as many residents live within close proximity to Heathrow airport. LBH supports the need to increase capacity at London airports through an increase in efficiency rather than an expansion of airport infrastructure. An increase in capacity at Heathrow will require additional public transportation infrastructure, of which LBH sees the Southern Rail Access alignment with a station at Bedfont as the favourable option for the residents of Hounslow and the south east. If an expansion of Heathrow were to be approved LBH would expect to see no additional road traffic as road transport networks to and from the airport already experience peak time congestion, which is one of the main reasons for exceedances of the air quality objectives across the borough.

Policy T9 Funding transport infrastructure through planning

LB Hounslow has contributed significantly to the delivery of Crossrail through the introduction of MCIL at £35 per square meter. In addition, Hounslow adopted a CIL charging schedule in 2015, and collects planning obligations where appropriate. The introduction of the MCIL draft charging schedule for Crossrail 2 (MCIL2), where Hounslow has been placed in the Band 2 category, requiring a contribution of £60 per square meter. This proposed new price a significant increase on the current rate and could negatively impact the Borough's CIL charging viability. The Borough will be submitting a full response to the current consultation of MCIL2.

LB Hounslow will, at present, receive little benefit to accessibility from either Crossrail or Crossrail 2, yet contributes heavily in the form of MCIL, and the Council would like to see the GLA support connections to Crossrail stations for boroughs such as Hounslow. As the commencement of Crossrail 2 is not guaranteed there should be reference to the process of funding redistribution in the event the Crossrail 2 scheme is postponed. Policy T9, point C should make mention of traffic congestion mitigation and road safety measures.