

WoBP Consultation
Spatial Planning and Infrastructure Team
Civic Centre Lampton Road
Hounslow
TW3 4DN

By email to: ldf@hounslow.gov.uk

6 December 2017

Dear Sirs,

CPRE London's response to Hounslow's West of Borough Local Plan Review consultation

Thank you for the opportunity to respond to this important consultation.

CPRE London is the London branch of the Campaign to Protect Rural England. We are a membership based charity concerned with the protection and enhancement of London's Green Belt, Metropolitan Open Land and urban open and green spaces. We have over 2,500 members. CPRE London members also have a wider interest in parks and open spaces and green infrastructure.

We strongly object to proposals to allocate 110 hectares (1,100,000sqm) of green space the majority of which (101 hectares) is Green Belt, for development, in direct contradiction to London Plan policy, because all of these parcels of land continue to fulfil Green Belt purposes.

- Some 1,110,000sqm (111 hectares) - the equivalent of around 180 football pitches - of Green Belt are proposed to be lost to development. This is clearly in direct opposition to the Mayor's stated policy to protect Green Belt and would hamper his target to make 50% of London green.
- **PLEASE NOTE our detailed comments on each site at Annex 1.** All of the Green Belt sites identified continue to fulfil Green Belt purposes.

We also strongly object to proposals to re-designate large sections of Green Belt to Metropolitan Open Land because these parcels of land continue to perform key Green Belt functions in holding back urban sprawl and stopping towns from merging. These sites should not be re-designated and should remain as Green Belt.

- Proposals to change large swathes of Green Belt to MOL ignores the roles of these sites in checking unrestricted sprawl (NPPF purpose 1) and preventing neighbouring towns merging (NPPF purpose 2).

The 2017 Green Belt review is significantly flawed and reaches erroneous conclusions

- **Completely different conclusions were reached in the 2013 and 2017 Green Belt Reviews.** The 2013 Green Belt Review found that most sites fulfilled at Green Belt purposes (see extract in Annex 2). However entirely different conclusions were reached in the 2017 Green Belt review which found most sites do not clearly fulfil Green Belt purposes (not just for 1 or 2 sites, but the majority of sites).
- **The council gives inappropriate reasons for conducting Green Belt review:**¹ The council makes inappropriately generalised statement not backed up with any specific evidence about why a Green Belt Review is needed. “However, with the passage of over 70 years, and the development of both London and the nature of the Green Belt in the same period, it is necessary to assess the Green Belt within a contemporary context and to redefine it for future generations.”
- **The 2017 Green Belt Review and the council’s assessments repeatedly ignore the function of separating the distinct towns of e.g. Feltham and Ashford.** The review only mentions the “separation between the edge of London and settlements in Spelthorne (Surrey). ” (P12) **This assumes, erroneously, that purpose 2 applies only to the edge of London.** Green Belt throughout London serves to stop suburban towns from merging. Page 12 also provides other examples of where *the second purpose is dismissed without*

¹ Contrary to what is featured as a justification in the new Green Belt assessments, **this new review was not featured at the Hearing as a major requirement**, but merely as an incidental component in a wider set of 12 aims for the West of Borough. In fact the Green Belt review referred to in this section of the 2015 Local Plan could have been interpreted as the review already undertaken. With a minor wording amendment the Inspector accepted policy GB1 on the Green Belt as Sound. Had the soundness of the existing Green Belt in Hounslow been an issue of concern to the Inspector this would have been indicated in this section of his report.

It is however a matter for concern that whilst the Inspector, the Council and residents were agreeing these allocations as sound at the 2015 Hearing behind the scenes the Arup study was nearing completion, and must already have opined to the council the unsoundness of these allocations.

Neither the Inspector or the public were aware of this massive change, and were clearly misled, although the officers presenting the policies- all of whom left the council within the next year or so- may also have been kept unaware; if not, they were placed in an impossible situation at the Hearing. ‘Garden city’ proposals being prepared by Urban Initiatives for Heathrow at the same time as the Arup review were dependent on a significant release of Green Belt land- including some areas identified by Arup as having some value as Green Belt.

Apart from a large replacement industrial /warehouse development on Bedfont lane, **there have been minimal significant changes in the character of Hounslow’s Green Belt since its designation since the changes of 1986, and none since 2013 review.** The ‘distinctiveness’ of communities is unchanged, and the assessments presented by Arup and repeated by the Council in the ‘2nd stage’ study fly in the face of the many earlier interpretations and assessments and represent merely opinions.

good reason: "In many cases, the designation of Green Belt in Hounslow neither prevents sprawl nor separates distinct towns;" ... "Fifteen of the 28 general areas only meet one of the three purposes of Green Belt that were tested, and to a weak extent;" ... "Much of the Green Belt in the central part of the Borough, focused on the Crane Corridor, does not serve purpose 1 and 2 of the three relevant purposes set out in the NPPF;" " It bears repeating that, in general, Green Belt in Hounslow scores poorly against the criteria in most cases. This is because it does not prevent neighbouring towns from merging and because much of it is hard to define as countryside."

- **The council appears, inappropriately, to be questioning NPPF Green Belt policy in its 2017 Green Belt Review, rather than seeking to apply it to its Local Plan,** making as it does inappropriate statements indicating that the national policy might be under review, when it is not. Specifically, the review document states: "The Green Belt is an emotive subject to debate. Many consider the Green Belt to be 'sacrosanct' and should not be developed at all. Others argue that the policy, which was established nationally in the 1940s, is outdated, rigid and ought to be comprehensively reviewed for current needs." This discussion is inappropriate in the context of a review which should be objective and evidence-based.

We can find no evidence that the council has adequately assessed the amount of 'derelict and other urban land' which could be 'recycled' (i.e. in relation to Green Belt Purpose 5). We are therefore submitting a list of sites which we believe could be 'recycled' to provide more space.

- **PLEASE NOTE we have listed alternatives to Green Belt sites: See ANNEX 3 (in a separate pdf document)**
- The Stage 1 Green Belt Review disregarded [purpose 5]... on the basis that.. "purpose 5 applies to all sites." This is a major concern - given that this is one of the most important purposes and at a minimum, an assessment should be made of whether, if a site was removed, it would serve to enhance development pressures (which was the approach taken in the 2013 review, as we understand it). In a footnote it says: "Purpose 5 therefore remains relevant in that all parcels serve it, but the need for land requires other factors to come into play. Purpose 5 should therefore be excluded." But this statement only holds if an assessment of land availability has been properly made. The approach to Green Belt Review has said that all sites fulfil the fifth purpose (to assist with urban regeneration, by encouraging the recycling of derelict and other urban land).

Site allocations appear to be for very low density development and well in excess of the stated requirement for commercial/industrial space, particularly if a higher density is assumed

- One site (“Airport Business Park”) of 44 hectares (440,000sqm) is allocated for just 145,000sqm of ‘light industrial / storage’ floor space. This seems particularly inefficient use of space, in particular if an assumption is made that development could be built to 4 or 5 storeys.
- Another example is the ‘Fagg’s Rd’ site which is listed as 34,900sqm, about 20,000sqm of which is green space but which the Site Allocation says will only deliver 5,700sqm of additional floorspace. This could be found by remodelling the already developed section of the site rather than encroaching into green space.
- Hounslow states that a total of 414,000sqm of additional floor space provision required for commercial / industrial [at least 201,000sqm of Industrial floor space; at least 190,000sqm of B1 workspaces (office /light industrial uses); at least 23,000sqm A1-A4 retail uses (Feltham) p49 main document]. And yet the borough is proposing to allocate something like 750,000sqm for these categories (it has been impossible to work out exactly how much).

Sustainable Development has not been adequately assessed

An assessment of sustainable development must take into account the harm and must consider whether the benefits outweigh the harm, however no discussion is made in any detail of the harms which would be caused generally or by developing individual sites.

- Green Belt provides a series of important environmental functions - most notably preventing urban sprawl and associated car-dependency, traffic and air pollution.
- Many of the sites allocated for development are also alongside or close to rivers and/or contain SINC, providing important green infrastructure for water and air quality management and wildlife habitat.

We found arguments and evidence for ‘exceptional circumstances’ to be very weak

The Green Belt review states: “... exceptional circumstances do exist in the form of the opportunity area status, closing the gap between objectively assessed need and supply for development growth and the.* This was not examined in the adopted Local Plan and the West of Borough Plan provides that opportunity.” [*this sentence was unfinished in the Green Belt Review document]. ***However, there are a number of reasons we cannot accept that exceptional circumstances exist:***

- (a) General pressures for housing or commercial space cannot be said to constitute exceptional circumstances, applying as they do to all of London
 - (b) exceptional circumstances should be assessed on a site by site, not a generalised, basis
 - (c) alternative, previously-developed sites have not been adequately assessed.
- The council’s statement (above) is dependent on an assessment of supply

generally, not just within Green Belt. The council must demonstrate with evidence that it has considered all potential alternative sites, intensification of existing industrial estates, surface car parks etc

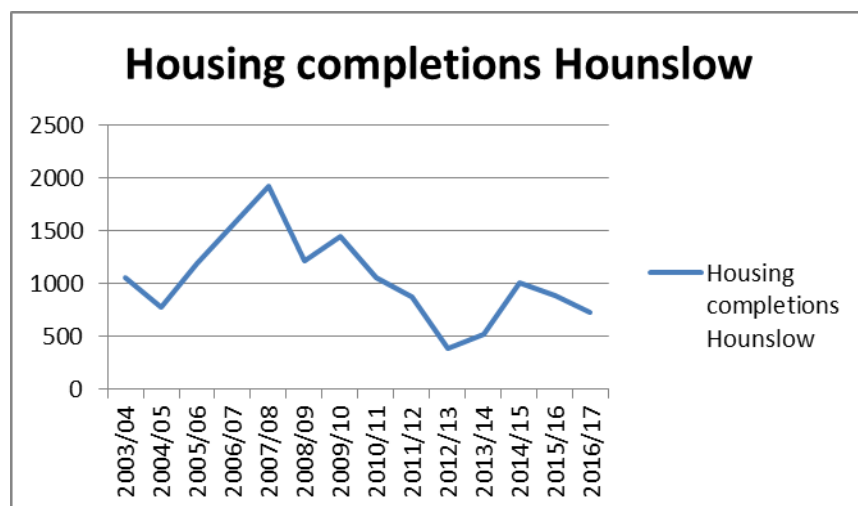
Site allocations and Green Belt Review sites are not cross referenced making for a lack of transparency

- The Site Allocations document does not identify many of the Green Belt sites proposed for development. This has made it difficult to match sites between documents. This does not aid transparency. It would be helpful if all major sites could appear in the Site Allocations, given unique reference numbers, and referenced within the main body of the Local Plan document (potentially referring back to the 'general areas' in the Green Belt review).

We object to the inclusion of Green Belt sites for housing when double the amount of land is being allocated for housing than is likely realistically to be used in the plan period.

- Housing Need is assessed at 1898 - double the current build rate. The build rate (completions²) in Hounslow has averaged 1042 units over the past 14 years and in more recent years this average has come down. See graph below.
- While accepting that build rates need to improve, we object to Green Belt land being included in allocations when land is being allocated in considerable excess to what is actually likely to be realistically needed. This is in part because it represents poor planning, but mainly because allocating Green Belt land among other sites for housing means that Green Belt sites may be developed before brownfield or other previously-developed sites - which in fact may never be developed in the lifetime of the plan because the estimates of what can be built have been assessed as unrealistically high. This *de facto* means that Green Belt Purpose 5 is being ignored.

Graph showing number of housing completions in Hounslow between 2003/4 and 2016/17.



[Building](#) See table 253

Thank you once again for providing the opportunity to respond to this important consultation.

Please let me know if you would like any clarifications.

Yours faithfully,

Alice Roberts
Head of Green Space Campaigns
CPRE London

70 Cowcross St, London EC1M 6EJ
020 7253 0300 Mobile 07792942691 Email alice@cprelondon.org.uk

ANNEX 1

Individuals sites which are identified for development in the main Local Plan document but which do not appear in Site Allocations - **49 hectares Green Belt loss (+ 2 hectares playing fields)**

		Space loss (est)
1E / 1W West of Southall Lane (“Cranford & Heston” in main LP doc). Large areas allocated for de-designation from Green Belt.	Clearly fulfils Green Belt purposes 1 and 2 and should be retained as Green Belt Clearly part of a larger area of Green Belt, clearly open, part of the stretch of GB which separates town Heston and Hayes. Clearly	8 H (Green Belt)
13 North-west of Clockhouse Roundabout (“Heathrow Gateway”). “The Heathrow Gateway site provides an opportunity to create a high-density mixed-use development located around a new Southern Access railway station, providing a mix of offices, apartments, hotels, shops, bars and restaurants.”	Clearly fulfils Green Belt purposes 1 and 2 and should be retained as Green Belt Clearly part of a larger area of Green Belt, separates East Bedfont and Stanwell and is part of a major piece of Green Belt which also separates Ashford and Feltham further to the south and south east	25 H (Green Belt)
Additional site connected to and south of “Heathrow Gateway” contained within Staines Road and Clockhouse Lane. Clearly connected to and possibly part of Bedfont Lakes Country Park.	Clearly fulfils Green Belt purposes 1 and 2 and should be retained as Green Belt Clearly part of a larger area of Green Belt, and is part of a major piece of Green Belt which also separates Ashford and Feltham	2 H (Green Belt)
15/15E East of Bedfont Road. Appears to be 3 main sites, two of around 5 hectares and one of around 2 hectares - so in total 12 hectares	Clearly fulfils Green Belt purposes 1 and 2 and should be retained as Green Belt Clearly part of a larger area of Green Belt; clearly forms a barrier between Bedfont and Ashford, as well as Feltham and Ashford, and to some extent Feltham and Bedfont - stopping these towns from merging; de-designation would clearly compromise	12 H (Green Belt)

	the larger area of Green Belt by impacting on its extent and openness.	
22E Feltham Marshalling Yard. Allocated for residential as part of the Future Feltham plans	Clearly fulfils Green Belt purposes 1 and 2 and should be retained as Green Belt Clearly connected to Hounslow Heath to the North West and forming part of a green chain with a thin link to the Longford River and Feltham parks beyond. Forms a clear boundary for Feltham on its East side, preventing it from merging with Hanworth and beyond; River Crane is also on the East of this site.	2 H (Green Belt)
Playing fields to the north of Elmwood Ave, Feltham (2.25H)	Loss of playing fields. It is difficult to assess the loss because the proposals simply show the site as allocated for housing	2 H (designation not known)

Site allocations - 52 hectares Green Belt loss (+ 7 hectares other green space)

Site Allocation notes + reference in Green Belt Review	Comments	Space loss (H)
Airport Business Park (Area 11: South of Hatton Cross / Hatton Road) Would provide 145,000sqm light industrial and storage : justification is it contributes to target of 201,000 sqm provision of industrial space (with some convenience retail/café). Industrial site across the road with potential for remodelling and to make better use of poorly used surface car park space; redevelopment of 50s/60s/70s buildings • SINC. PSZ	Clearly fulfils Green Belt purposes 1 and 2 and should be retained as Green Belt 44 hectares of Green Belt clearly connected to other Green Belt. It is clearly connected to wider Green Belt i.e. supports Purpose 1 in holding back urban sprawl; it is a very clear outer edge of London (the airport being beyond London's development). It supports Purpose 2 - it is a clear boundary for Feltham. Its de-designation would compromise the wider Green Belt in the area. Partly designated as a SINC increasing its value as green space.	44 H (Green Belt)
Central Park Trading Estate (Area	Clearly fulfils Green Belt purposes 1	4 H (Green

8E Green Lane Sports Ground / Donkey Wood) Wanted for 'light industrial / storage'	and 2 and should be retained as Green Belt Clearly connected to Hounslow Heath to the south (also to Green Lane Allotments to the North, creating a Green Chain - see Site Allocation below) Contributes to the separation of Hounslow West and North Feltham	Belt)
Fagg's Road, Feltham (connected to or part of General Area 11). Green Land surrounding Geodis Freight Forwarding. 3.49 hectares (about 2 of which is green space) connected to 'Airport Business Park' above. Wanted for employment floorspace = 5,700 m2 (Calculation based on the highest point of PTAL 3 which is 70-170 u/ha but due to Public Safety Zone, the calculation is based on the minimum 70u/ha).	The boundary should be drawn tightly around the built up area, leaving the surrounding green space to connect with the Green Belt which should remain intact. This would involve loss of around 20,000sqm to create 5,700sqm of employment space. We would argue that this could be found by intensifying the existing built development on the site. Not clear if the land is designated Green Belt but the site is surrounded by Green Belt and could readily form part of the Green Belt.	2 H (not clear if GB or not)
Green Lane Allotments Site to the north east of the 'Central Park Trading Estate allocation'. Doesn't appear to be allotments. Designated 'local open space'. In a public safety zone PSZ. Council say no longer needed for allotments. Proposed allocation is for residential / storage for travelling show people's equipment . Designated Open Space	This should be retained as green space as it is clearly part of a green chain linked to Hounslow Heath and beyond. This land should be retained as Local Open Green Space, saving this land to be enhanced and returned to allotments or retained to create woodland to improve the green chain in terms of providing quality habitat.	4 H (Local Open Space)
Heathrow International Trading Centre Proposed redevelopment of the site. "Due to numerous constraints (SINC and the Flood Zone 3a area) on this site the redevelopment /intensification of the site would	The site allocation should be drawn around the built up areas only (it currently extends towards the River Crane which forms part of the green fields to the east of the river) and leave out the green spaces which also act as a flood plain. The site could be	Green land around fringes

need to be sensitively carried out”	redeveloped without building onto the fields.	
Royal Naval Association Club Not clear if this is on Green Belt land. Mentions SINC issues	Need to be sensitive to SINC issues. Otherwise no objection. Previously developed land though the boundary is bigger than the built footprint (though it is all hardstanding)	
Tesco Duke’s Green Superstore / Tesco Feltham Superstore Appears to support intensification of these sites for housing	Consider whether noise and pollution issues make this an inappropriate site for housing. Makes sense to redevelop the site but it is down for housing and commercial: it is very close to Heathrow - so noise issues should mean it makes more sense to use this for additional commercial space	
Vacant land Dick Turpin Way 10W West of Girling Way (south of A30, East of Fagg’s Road). Green Belt land. Wanted for industrial space	Clearly fulfils Green Belt purposes 1 and 2 and should be retained as Green Belt Land creates a clear connection between the River Crane sites to the East and the large Bedfont Rec/farm site to the West. Clearly part of a much bigger piece of Green Belt.	4.25 H (Green Belt)
Vantage Park / Heathrow Causeway Centre Partially in Green Belt. Not clear why this should be needed Wanted for B1/B8 employment uses	The site allocation should be drawn very tightly around the existing built up area. Unnecessarily pushes out into the green space. Mostly this site is already developed but it is very close to the River Crane and would remove what little green space is left to the East of it. This is a flood plain and SINC	Fringes
Nene gardens - Local open space		0.34H
New Road Triangle - Local open space		0.41H

ANNEX 2

EXTRACT from 2013 Green Belt Review, which found all areas of Green Belt to meet the purposes of the NPPF.

North (Figure 5)

4.6 The north west of the borough presents some large areas of open space, and thus Green Belt. The largest piece of undeveloped land in this part of the Green Belt is Rectory Farm which is predominantly agricultural land. Avenue Park to the north western border (adjoining Hillingdon's Cranford Park) provides a long strip of open space; however a very valuable one as it connects the land running alongside the River Crane.

4.7 This part of the Green Belt is clearly open and demonstrates attributes important to Green Belt land. In the north of the borough, the land meets the purposes of the NPPF by ensuring that a strong Green Belt barrier is in place along the western boundary of the borough. Around Heston Services and the BA Concorde Club the Green Belt is wide and serves in separating large masses of developed land around Heston and Cranford.

South (Figure 6)

4.8 The southern part of Hounslow's Green Belt is made up of two sizeable spaces; Hanworth Park and Hounslow Heath. The southern boundary with Richmond borough is made up of a large developed site, known as Kempton Waterworks which is allocated in the UDP as a Major Developed Site in the Green Belt. Other land surrounding Kempton Waterworks is made up of fields as well as sports clubs and grounds.

4.9 Hounslow Heath provides a large green barrier between the two major towns of Hounslow and Feltham thus preventing the two from merging. Hanworth Park also provides a barrier function between Feltham and Hanworth, notably separating large industrial areas.

4.10 There are a few 'slim connections' in the southern part of the Green Belt across roads; however the spaces either side offer large areas of open space. The connections are made to aid the continuity of the Green Belt across the borough. This is most notable on the Uxbridge Road in Hanworth where the Green Belt is connected through a small pathway to link the De Brome open space and Hanworth Park.

4.11 This part of the Green Belt is performing a strong function in restricting urban sprawl and preventing towns from merging into one another. The borough

boundary at this point in Hounslow borders Richmond, which continues the designation on the other side. This therefore enhances the strength of the Green Belt in this area.

West (Figure 7)

4.12 The west of the Green Belt contains Bedfont Lakes Country Park as well as some large open spaces made up of fields and agricultural uses. Also within this part of the Green Belt there is HRH Feltham Young Offenders Institute which consists of over 20 hectares. The Green Belt in the west satisfies the five purposes as set out in the NPPF. The large areas of open space aid the separation of Feltham and Ashford (located in the Borough of Spelthorne).

4.13 There are two unusual pieces of land to the north of the western parts of Green Belt. One is a piece of land (site reference 33) which is completely unconnected from the rest of the borough's Green Belt, however is located on the borough boundary. This connects up to the green space in the London Borough of Hillingdon around the airport and forms a piece of open space on the south eastern side of Great West Road. The other is an obvious piece of open space, however protrudes through a small pathway, thus connecting to another piece of open space. This provides a valuable piece of land as it separates urban development and stops built form from merging with one another (site reference 53).

ANNEX 3

A list of sites which we believe could be 'recycled' to provide more space:
PLEASE SEE SEPARATE pdf DOCUMENT