



EMPLOYMENT DEVELOPMENT PLAN DOCUMENT

Adopted 25 November 2008

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LONDON BOROUGH OF HOUNSLOW

LDD2

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Acronyms

BAAP	Brentford Area Action Plan
BME	Black and Minority Ethnic
DPD	Development Plan Document
FBS	Financial and Business Services
GLA	Greater London Authority
IBP	Industrial Business Park
KEOL	Key Existing Office Location
LDF	Local Development Framework
LDS	Local Development Scheme
LSIS	Locally Significant Industrial Site
LSP	Local Strategic Partnership
ONS	Office of National Statistics
PIL	Preferred Industrial Location
POL	Preferred Office Location
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
SIL	Strategic Industrial Location
SME	Small and medium sized enterprise
SPD	Supplementary Planning Document
SRDF	Sub Regional Development Framework
SA	Sustainability Appraisal
UDP	Unitary Development Plan
WLEDS	West London Economic Development Strategy

Note: There is a glossary on page 66 of the Development Plan Document.

1. Introduction

- 1.1 The purpose of the Employment Development Plan Document (DPD) is to plan the future use of land for employment including industrial and commercial uses in the London Borough of Hounslow. This is achieved through directing new employment development to appropriate locations and the management, protection and release of industrial and commercial land and buildings.
- 1.2 The DPD is relevant to the development of employment uses and land in or proposed for employment uses. Employment uses within the context of this DPD include those uses as defined within the 'B' use class of the Town and Country Planning (Use Classes) Order 1987 as amended; related sui generis uses; hotels and conference facilities. The area that the DPD relates to is the London Borough of Hounslow.
- 1.3 This Employment DPD is prepared as part of Hounslow's Local Development Framework (LDF) and in parallel with the Brentford Area Action Plan. The DPD has been prepared in advance of the Core Strategy topic area, which is primarily as a result of its relationship with the Brentford Area Action Plan (BAAP).
- 1.4 Significant market pressure for change in the Brentford area has necessitated a review of policy, some of the issues to be addressed being relevant not just in a Brentford context but borough wide. The production of the BAAP in parallel with the Employment DPD has enabled consistency between the documents and conformity of the BAAP with employment core policies rather than existing UDP policies.
- 1.5 The Employment DPD replaces the employment and economic development policies and objectives of the current Unitary Development Plan (UDP) adopted December 2003 (see Annex 2).
- 1.6 The DPD has been prepared in accordance with the Statement of Community Involvement (adopted September 2006) and procedures and milestones set out in the Local Development Scheme (amended April 2007).
- 1.7 Together with the "saved" policies carried forward from the Unitary Development Plan, and the Mayor's London Plan, the Employment Development Plan Document has, upon adoption, formal Development Plan status.
- 1.8 Upon adoption of the Brentford Area Action Plan, Core Strategy and other Development Plan Documents forming part of Hounslow's Local Development Framework, the Employment Development Plan Document will form part of a suite of Local Development Documents. Together these documents will form the Development Plan for the Borough and should be read in conjunction with each other upon their adoption. Proposals will be considered in the context of all extant documents comprising the Development Plan at the time, and will be assessed in relation to all the policies in those documents.

- 1.9 The evidence base for the development plan document will be reviewed on a regular basis to ensure the information used to inform decisions is up to date. The development plan document will be reviewed in 2018, 10 years from its adoption.

2. Structure of the Document

- 2.1 The Development Plan Document contains a vision (p.19) for the London Borough of Hounslow in the context of employment land and economic development. The vision outlines what the Council would like the Borough to be like at the end of the plan period in 2018. The vision for the Employment Development Plan reflects the vision and objectives of the Community Plan 2007 - 2010, and is implemented through the objectives, spatial policies and locational policies that follow in the plan.
- 2.2 The objectives (p.19) are derived from the vision and illustrate how the development plan will seek to achieve the vision. From the objectives stem the spatial policies (E1 – E4). Spatial policies are policies that integrate policies for the development and use of land with other policies that influence the places people work and live.
- 2.3 Spatial policies can be delivered through means other than the granting or refusal of planning permission, as outlined in the implementation sections that follow each spatial policy. The spatial policies in the plan also reflect the aims of other organisations, including West London Business and Hounslow Chamber of Commerce. Therefore the strategies, initiatives and actions of other organisations will help in achieving the outcomes of spatial policies in the DPD. The means for delivery of spatial policies are identified after each spatial policy along with indicators/targets to monitor the policy's performance.
- 2.4 The objectives and spatial policies of the Employment Development Plan Document are implemented in part through locational policies (EP1 – EP10). Each locational policy has justification to support its implementation. To monitor the policy's implementation, indicators are presented with specific targets against which the indicators can be measured.
- 2.5 The policies in the Employment DPD have been assessed for their impact on the economy, community and environment. The Sustainability Appraisal process has enabled the assessment of alternatives including the comparison of impacts. This has contributed to policies that achieve the best outcomes for sustainability.
- 2.6 In considering the impacts of policies on communities, the economy and environment, an assessment has been made of the significance of effects i.e. the probability, geographical scale, duration and timing of the effects arising. To ensure the development plan document is as sustainable as possible, mitigation measures have been identified to ensure the adverse effects arising from any objectives and policies are minimised and any benefits maximised.
- 2.7 In identifying the effects arising from implementation of policies, an indicator and corresponding target have been specified, which relate back to the sustainability objectives presented in the Sustainability Appraisal Scoping Report (September 2005).

- 2.8 The Council will monitor the impact and effectiveness of policies in the DPD, to assess whether we are achieving our objectives and, ultimately, the spatial vision. The Council will also monitor changes to Government and regional guidance. All monitoring related to the DPD will be reported through the Annual Monitoring Report, as will the need for any changes to the DPD.
- 2.9 The Annual Monitoring Report will report on each of the indicators set out in the monitoring section after each policy, and assess their performance and effects against the targets set out in the DPD. It will identify where policies are not working to achieve the vision and objectives, and set out changes to policies where this is considered necessary.
- 2.10 The Council will address the wider spatial issues associated with employment in the preparation of its Core Strategy. This will provide the opportunity to incorporate the policies and programmes of other bodies involved in meeting the employment needs of the Borough, including education, skills training, and business support, as well as the provision of infrastructure and services to improve accessibility.

3. Spatial Portrait and Issues

- 3.1 Located in outer west London, adjacent to Heathrow and intersected by many of the major transport routes into the capital from the south and west, Hounslow functions as a gateway to London. These factors have led to an economy influenced by the airport and served by concentrations of commercial and industrial activities in the Borough's town centres and along the road, rail and waterway routes through the Borough. The Council encourages entrepreneurship and business growth and seeks to ensure Hounslow remains an attractive location for business, which can contribute to the growth of the local economy. The presence of major providers of Higher and Further education in the Borough greatly assists in this respect.
- 3.2 Hounslow is a diverse borough culturally and also economically. Industrial and commercial land in the western part of the Borough is dominated by airport related logistics, construction and service industries including hospitality and catering. The West area, together with Heston and Cranford, contains close to half the Borough's identified industrial and commercial estates, including the strategically important North Feltham Trading Estate. Other large industrial estates can be found off the Great West Road in Brentford, with smaller local estates in the Central Hounslow and Isleworth area.
- 3.3 Elsewhere in the Borough, where the airport has less of a direct influence, there have been signs of restructuring in the wider economy. Some traditional industrial estates have been affected by a nationwide decline in manufacturing and are characterised by ageing, sometimes obsolete commercial floorspace, some of which lies vacant and underused. At the same time there has been a significant shift towards a mix of low and high-tech service based employment, an example being creative industries.
- 3.4 The Borough's four town centres – Hounslow, Chiswick, Brentford and Feltham, plus Chiswick Business Park, the Great West Road and Bedfont Lakes, are the Borough's existing office areas. Hounslow and Feltham town centres have undergone significant redevelopment and the Council is currently facilitating the regeneration of Brentford. Chiswick Business Park, close to Chiswick town centre, has developed to become one of the strongest locations for office lettings outside central London. Whilst the business park at Bedfont Lakes and offices on the 'Golden Mile' have traditionally been key office locations, the relatively low levels of access by public transport means these locations are not sustainable alternatives to town centres and Chiswick Park. Changes of use are now a feature on the 'Golden Mile' as a number of vacant employment sites have been subject to interest from developers for major residential led mixed-use developments.
- 3.5 In terms of its labour force, the Borough's economy supports approximately 121,400 jobs (Annual Business Inquiry Employee Analysis, 2005) and has an economically active resident population of 117,100 (Annual Population Survey, July 2005 – June 2006). Service industries account for 92.5% of jobs

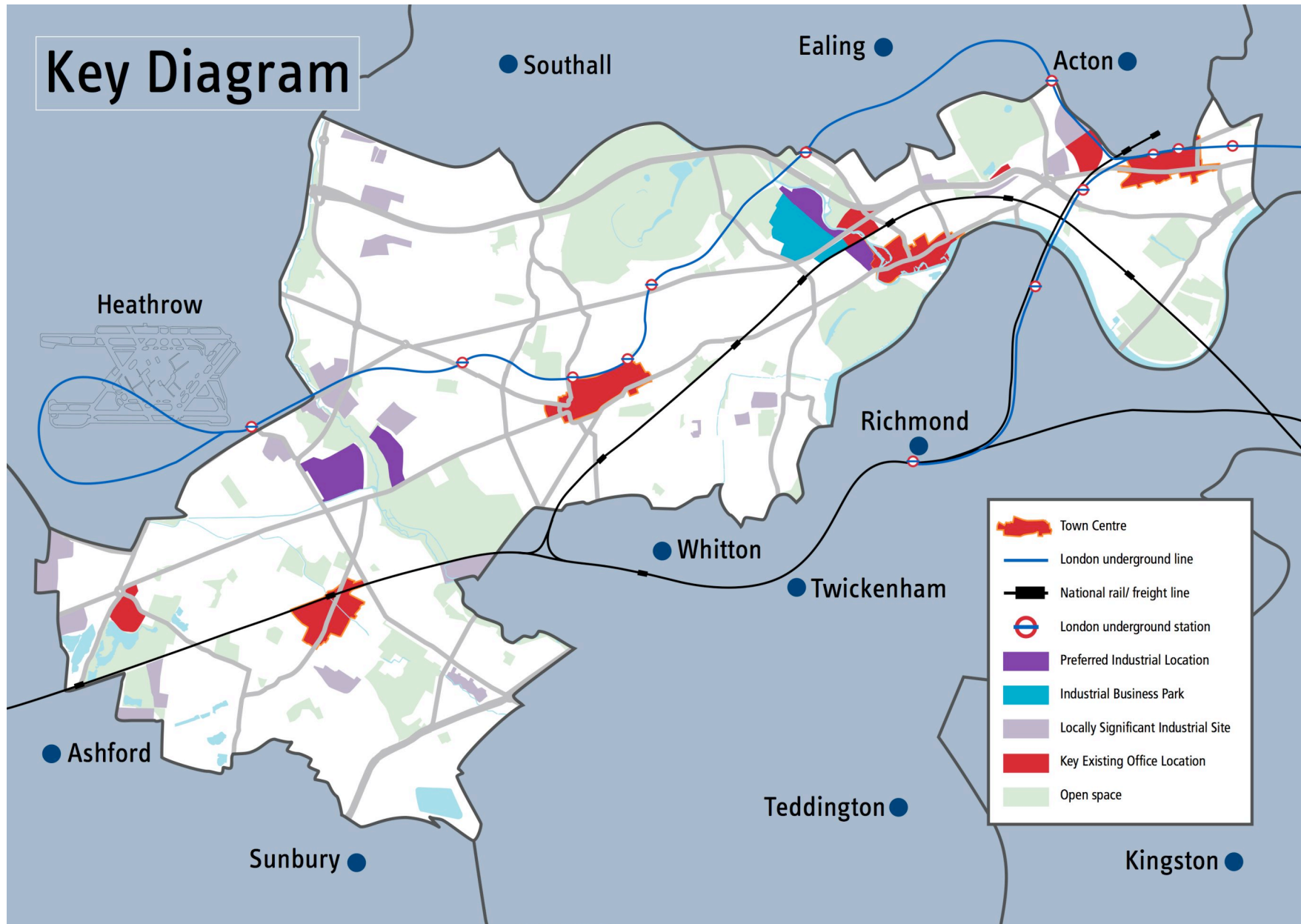
in the Borough, the majority of which are in finance, IT, other business activities and distribution, hotels & restaurants.

- 3.6 The number of employment opportunities is projected to grow by a further 15.2% between 2006 and 2026, creating an additional 19,900 jobs (*GLA Outer London: Issues for the London Plan 2007*). It is likely that the majority of these jobs will be in the business and service sectors, based on employment trends at a London and West London level. Note, the Council has reviewed the ONS data and is questioning the accuracy of this. The Council consider the ONS population figures to be an underestimate of the Borough's existing population.
- 3.7 Hounslow has relatively low unemployment for London, but, as elsewhere, particular groups (e.g. some ethnic minorities, lone parents and people with disabilities) experience significantly higher unemployment levels. Another distinctive feature of Hounslow's labour force is the disproportionate number of people with low qualification levels (particularly amongst those in the west of the Borough). This may in part reflect the number of low skilled jobs in the local economy, of which the principal driver is Heathrow Airport. The low level of skills amongst residents has a number of implications. There is an immediate effect in that take home pay and household incomes are low. This was highlighted in the GLA Economics Current Issues Note 14 *Patterns of low pay in London* (March 2007), which states that low pay is concentrated in outer London with particular reference to Hounslow (16,200 people).
- 3.8 In the longer term, if, as is likely, the need for low skilled jobs diminishes through productivity gains and growth in higher skilled "new economy" jobs, there will be higher unemployment and a less competitive local business base. Furthermore, many of the existing employment opportunities and skill shortages are already in higher skill areas. As explained in later sections, the Council is seeking to develop the skills and knowledge of its residents, providing the opportunity for people to reach their full potential. Through enhancing choice and access, the Council wishes to inspire and create a workforce with the ability to meet the needs of businesses locating in the Borough.
- 3.9 Another related aspect of employment is that Hounslow has relatively low levels of entrepreneurship, reflected in levels of business start-up that are low by London standards. Again, this is particularly the case in the west of the Borough. The provision of affordable workspace on flexible terms for small to medium sized companies could provide for more local entrepreneurship and innovation and contribute to the health of the local economy
- 3.10 Airport related employment accounts for approximately 20% of the Borough's employment as far as it is possible to determine. In addition, many blue chip and smaller firms are attracted to Hounslow by its convenient location between the airport and central London.
- 3.11 The Council, in promoting and retaining a variety of types and sizes of employment space, together with other factors, including its location,

contributes to Hounslow being an advantageous location for existing businesses and attractive to future business.

- 3.12 The Council will keep under review the evidence relating to supply and demand for employment land and floor-space, and will bring forward any more detailed policies for employment uses as part of the Core Strategy.

Key Diagram



4. Policy Context

- 4.1 The following section sets out the policy context to the DPD, outlining the national, regional, sub regional and local policy framework that informs this document.

National Guidance

- 4.2 Planning Policy Guidance Notes (PPGs), and Planning Policy Statements (PPSs), which are replacing PPGs, set out the Government's national policies on different aspects of land use planning in England. The following provides an overview of those parts of PPGs and PPSs relevant to the DPD.

PPS1 – Delivering Sustainable Development

- 4.3 Planning Policy Statement 1 sets out key principles in providing for sustainable development including:
- social progress which recognises the needs of everyone;
 - effective protection of the environment;
 - the prudent use of natural resources;
 - the maintenance of high and stable levels of economic growth and employment.

- 4.4 These aims should be pursued in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment while achieving sustainable outcomes for communities and the environment.

- 4.5 In seeking to achieve sustainable economic growth, PPS1 states that suitable locations should be available for industrial, commercial, and other development, so that the economy can prosper.

PPS3 - Housing

- 4.6 In considering new locations for housing, Planning Policy Statement 3 states that consideration should be given to whether sites currently allocated for industrial or commercial use and/or vacant and derelict industrial or commercial sites would be more appropriately reallocated for housing.

PPG4 – Industrial, commercial development and small firms

- 4.7 Planning Policy Guidance 4 states that development plans should contain clear land use policies for different types of industrial and commercial development and positive policies to provide for the needs of small businesses (para. 5). Policies may be included that aim to channel particular types of development to particular locations (para. 8). This reflects the locational needs and environment suitable for offices and industrial uses.

- 4.8 Guidance also states that new development should be in locations accessible by sustainable modes of transport (para. 10) and that industrial uses that may be detrimental to amenity should be separated from sensitive land uses (para. 8). Furthermore, there is the need to locate development where it is unlikely to add unacceptably to congestion.

PPS6 – Planning for town centres

- 4.9 A key aim of Planning Policy Statement 6 is to promote the vitality and viability of town centres. In achieving this, offices and hotels should be directed to town centres as they provide employment opportunities in and attract people to the centre. Town centres are the most accessible locations by sustainable modes of transport and uses that attract a large number of visits should be directed to these locations in accordance with the sequential approach.

PPS10 – Planning for sustainable waste management

- 4.10 Planning Policy Statement 10 states that sufficient opportunities should be provided for the provision of waste management facilities in appropriate locations. A broad range of locations including industrial sites should be considered including opportunities to co-locate waste facilities with complementary activities.

PPG13 - Transport

- 4.11 PPG13 has key objectives of promoting more sustainable transport choices, promoting accessibility to jobs by public transport, walking and cycling and reducing the need to travel, especially by car.
- 4.12 With regard to developments that generate substantial freight movements, PPG13 states that such uses should be away from congested central areas and residential areas, ensuring adequate access to trunk roads.

London Plan

- 4.13 The London Plan sets a strategic objective of promoting strong and diverse economic growth. In achieving this objective, the Mayor of London wishes to -

Create incentives and opportunities to stimulate the supply of suitable floorspace in the right locations ...

Release employment land no longer needed in its current use for new uses.
(London Plan, p8)

- 4.14 Policy 3B.1 of the London Plan promotes diversity in the London economy through seeking a range of premises of different types, sizes and costs to meet the needs of different sectors and firms.
- 4.15 With specific reference to offices, the Mayor seeks to enhance the flexibility and quality of London's office market offer through renewal whilst meeting the diverse needs of business (Policies 3B.2 and 3B.3 of the London Plan).
- 4.16 In terms of industrial and warehousing land, the Mayor has established a Strategic Industrial Location (SIL) Framework that provides a hierarchy for

managing the supply of industrial land (Policies 2A.10 and 3B.4 of the London Plan).

- 4.17 In accordance with a 'plan, monitor, manage' approach Strategic Industrial Locations are identified in the London Plan and boroughs may also identify locally significant industrial sites for retention of industrial capacity. Policy 3B.4 also states that boroughs should manage the release of surplus land to other uses in order to achieve the efficient use of land. Supporting text to Policy 3B.5 (para. 3.157) states *surplus employment land should help meet strategic and local requirements for other uses such as education and community activities and, in particular, housing.*
- 4.18 In promoting economic growth, the Mayor gives support to a number of emerging growth industries in Policies 3B.5 to 3B.10 of the London Plan.
- 4.19 Policy 3B.8 of the London Plan seeks to provide development capacity to retain creative industries in London. The *Creative Industries Framework for West London* (2005) highlighted significant growth in creative industries in Hounslow between 1995 and 2000 of 173%, within the London quartile with the most growth. Whilst there has been growth in creative industries, for example high value media companies locating in Chiswick Business Park and continued expansion of BSkyB's operation in Brentford, there are not clearly defined clusters of activity in the Borough to justify the designation of specific areas.
- 4.20 This is consistent with the conclusion in a report for West London Business (*Business mapping and research to prevent business failure and encourage business growth in Hounslow* - Jan 2007), that it is difficult to determine where this sector is located. Opportunities for the development of creative industries are therefore sought in all areas contributing to a diverse economy.
- 4.21 The London Plan emphasises the importance of the tourism industry and its development with the Olympics. Policy 3B.9 seeks to improve the tourist environment, visitor information and management and Policy 3D.7 seeks to increase visitor accommodation in the capital
- 4.22 Other London Plan employment policies seek to improve and promote innovation (3B.5), ICT infrastructure (3B.6), e-London (3B.7) and environmental industries (3B.10). The renewal of buildings and new development in the Industrial Business Park on the Great West Road will ensure the provision of attractive, high quality facilities to support e-business and high value uses. Through design policies, proposed for review as part of the Core Strategy and generic development control policies, the Council will consider how new development can support innovation.
- 4.23 Objective 3 and Policy 3B.11 of the London Plan seek to provide relevant training and support to enable Londoners to compete successfully for jobs.

Sub regional dimension

- 4.24 The Sub Regional Development Framework for West London (May 2006) highlights the challenge of managing growth and ensuring it goes into the right places and takes the appropriate form. Town centres with high levels of public transport accessibility are seen as locations where commercial growth should be directed and more intensive development should be encouraged.
- 4.25 Outside the town centres, the strengths of industry and distribution are recognised, particularly around Heathrow. There is considered to be scope for more intensive industrial development in some locations to maintain their role, while allowing for limited release of commercial sites to alternative uses. The West London Economic Development Strategy (December 2004) (WLEDS), which provides further direction at a sub regional level has the following vision:
- 'West London will be the choice location for both businesses and individuals, an inclusive and sustainable society where business and communities benefit from a global perspective, a leading player in the development of London as the global hub. 'A destination renowned for creating richer solutions and opportunities through its ability to embrace and celebrate diversity, change and success with all its participants.'*
- (WLEDS, p26 para. 2.11)
- 4.26 In achieving this vision, the WLEDS wishes to see the promotion, management and enhancement of the quality of existing stock in 'Key strategic employment locations', as well as supporting the rejuvenation of town centres for employment, shopping and living.

Hounslow

Community Plan

- 4.27 At a local level, the Community Plan (2007 – 2010) prepared by the Local Strategic Partnership (LSP) has an overarching theme of 'A growing community', which provides a framework for supporting the delivery of services and activities.
- 4.28 In achieving the overarching theme of 'A growing community', the key objectives are:
- To ensure spatial plans for Hounslow achieve sustainable development of the Borough by balancing economic and social growth needs with the protection and enhancement of the environment;
 - To ensure that the new developments contribute to meeting current and future needs but complement the surrounding area;
 - To ensure new housing provision is supported by amongst other uses and infrastructure, business areas to build sustainable communities;
 - To ensure the full and active involvement of all of the community in our development plans for the Borough and in deciding on individual proposals.

4.29 There are 6 themes with objectives below each, the most relevant theme for the Employment DPD being:

‘An Economically Active and Skilled Community’ will ensure Hounslow prospers from economic growth and that residents have the right skills to be actively involved.

4.30 A number of challenges are identified as facing the local economy including:

- Easy access to low skilled jobs makes it harder to persuade young people to stay in education and training long enough to gain higher-level skills;
- Affordable business premises on flexible terms suitable for start-up are harder to find;
- Uncertainty about airport expansion plans and the premium airport activity places on industrial land inhibit business growth in more sustainable sectors;
- Traffic congestion slows down the local economy and causes significant amounts of pollution.

4.31 To address these, the key objectives to achieving an ‘economically active and skilled community’ are:

- To complete the regeneration of Hounslow Town Centre and Brentford;
- Increase skills attainment particularly at “NVQ level 3” by encouraging more young people into further education and apprenticeships and reducing the number of 16-18 year olds “Not in Employment, Education or Training” (NEET);
- Increase the number of Borough residents in paid work;
- Support local business growth and development, promoting the Borough to attract investment and development.

4.32 One of the means for determining whether these objectives have been achieved, particularly the last of the four, is through the Employment DPD. This reflects the Local Development Framework being the spatial expression of the Community Plan.

Local Area Agreement

4.33 The Local Area Agreement (LAA), also prepared by the Local Strategic Partnership, enables the delivery of outcomes that meet the needs of the Hounslow community and reflect the priorities identified in the Community Plan.

4.34 There are four themes – Children and Young People; Safer Stronger Communities; Healthier Communities and Older People; and Economic Development and Enterprise, the latter being the most relevant to the Employment DPD. Key to the Economic Development and Enterprise block is the ‘Gateway to Success Programme’, a programme for improving employment opportunities and skills development, particularly for those who are currently most disadvantaged.

- 4.35 The key targets of the programme are aimed at increasing the number of lone parents in work; increasing the take up of apprentices by employers; and retaining successful local businesses (and the jobs they create). In spatial terms, policies in the DPD have the most influence on the latter of the three targets in providing capacity for business growth.

The Hounslow Plan

- 4.36 The Hounslow Plan, in delivering the policy framework for the Executive over the period to 2010, sets ten priorities under three broad policy themes of Organisational delivery, Quality of Life and Looking to the future.
- 4.37 Under 'Quality of life', the Council seeks
- to safeguard and enhance the environment including working for high quality development;
 - to improve standards in schools. Ensuring a good education can provide greater opportunities later in life. Providing for learning and skills development early can provide a 'ladder of opportunity' and allows people to reach their full potential. The commitment to improving knowledge and skills is therefore central to the Council.
- 4.38 In 'Looking to the Future', the Hounslow Plan has priorities of
- delivering the existing Community Plan Objectives, commitment to key local issues and positive engagement with the community including businesses;
 - leading in delivery of the new Community Plan;
 - developing a vision for the physical development of the Borough, which this Development Plan Document contributes to.

Unitary Development Plan 2003 – Saved policies

- 4.39 The DPD is also framed by the general principles of the Unitary Development Plan including:
- Sustainability, accessibility, opportunity and equity;
 - Concentrating development in town centres and regeneration areas;
 - Re-use and renewal;
 - Encouraging economic success;
 - Environmental enhancement;
 - Reducing waste and pollution;
 - Working in partnership.
- 4.40 The implementation of these principles is set out in the objectives of the UDP and objectives in this DPD. Relevant to the Employment DPD and its implementation are those UDP objectives not superseded by this plan including:

To encourage a pattern of land use and provision of transport which minimises harm to the environment and reduces the need to travel, especially by car, whilst maximising development opportunities in the Borough... (IMP.1)

To encourage development (or measures) that regenerate or enhance the vitality, viability and character of town centres at Brentford, Hounslow, Feltham and Chiswick in terms of their ... employment ... (IMP.2)

To promote sustainable development within the Borough through integrating transport and land use policies in order to reduce the need to travel, reduce reliance on the private car (T.1)

- 4.41 The objectives of the UDP will be superseded by the emerging Core Strategy and other DPDs upon being adopted (refer to section 1.0). Whilst the Core Strategy will provide a new set of principles for the future planning of the Borough, the Employment DPD is consistent with the key principles in the UDP identified above.

Vision

Hounslow will be a borough with a thriving economy, where there is sufficient land and floorspace to accommodate projected employment growth in the office and industrial sectors and the needs of business.

Diversity, in terms of the ability for all sections of the population to benefit from economic activity, and a range of employment sectors and business sizes (including enhanced opportunities for small and medium-sized enterprises) will contribute to a thriving local economy. In achieving this, the Council will continue to encourage the development of existing businesses and attract new companies to the Borough.

Hounslow's residents will have opportunities to advance their skills through learning and training and there will be a range of job opportunities to enable people with different skills to gain employment locally. Jobs will be in accessible and, where possible, sustainable locations, therefore ensuring they are accessible to all the Borough's residents.

Objectives

- 1 To maintain and enhance Hounslow's employment role in both a strategic and local context, promote diversity in business, a range of employment sectors and size of businesses.
- 2 To provide capacity to accommodate future employment growth, whilst aiming to achieve an appropriate balance in supply and demand for employment land.
- 3 To ensure that development is appropriately located and the negative impacts of existing and new development on the environment, economy and community are minimised. In minimising the impacts of existing and new development on the environment, the Council will require the safeguarding of nature conservation interests. Development that is not in compliance with the requirements for the Conservation (Natural Habitats &c) Regulations 1994 is not considered to be in accordance in the Employment DPD.
- 4 To improve equality of opportunity for residents in the Borough through employment, training and education, and ensuring developments are accessible to all.

The Council will address the wider spatial context for the Employment DPD as part of the preparation of its Core Strategy, which will incorporate the objectives, policies and programmes of other bodies involved in employment issues.

SPATIAL POLICIES

E1 Maintaining Employment Capacity

The Council will seek to sustain and enhance employment capacity (land, floorspace, and/or jobs) through:

- management and protection of strategic and locally significant locations for employment including town centres (Hounslow, Chiswick, Brentford and Feltham); key existing office locations at Chiswick Business Park, Bedfont Lakes and on the Great West Road; strategic industrial locations (Brentford, North Feltham, Great West Road) and locally significant industrial sites across the Borough (refer to proposals map);

and

- the appropriate change of use of land and buildings from employment to non-employment uses.

Implementation

- 5.1 The policy of sustaining and enhancing employment in the Borough through the protection of sites and release of land/buildings will be implemented through planning decisions.
- 5.2 The programmes of West London Business help deliver the policy as outlined below. Improvements to transport proposed in the LIP (see below), which enhance access to employment, support the retention of existing business and potentially attract new business.
- 5.3 Core Policy E1 will be implemented through:
 - *Business retention programme of West London Business (work forming part of Hounslow's Local Area Agreement)*

West London Business is delivering a business retention intervention programme for Hounslow. The priorities are to retain 'at risk' businesses and support the growth of those businesses with the highest potential (translating into jobs, both safeguarded and new). This supports delivery of Policy E1 in sustaining and enhancing employment in the Borough.

- *Local Implementation Plan (LIP) July 2007*

The LIP sets out proposals for local transport improvements within the Borough. Policies address issues of access for all (Policy HLIP9) and sustainable transport (Policy HLIP12), amongst others, reflecting the objectives for a safe, accessible, green, efficient and attractive transport environment.

'Proposals' (General Statements of Intention) are set out in the LIP to implement the transport objectives that in turn contribute to delivery of the Mayor's Transport Strategy. Relevant proposals include but are not limited to the following:

- To mitigate the existing demands of the car by improving the Boroughs transport environment for pedestrians, cyclists and public transport.

This proposal supports Policy E1 through improvements to sustainable transport. Through mitigating existing demands, future capacity can be provided whilst ensuring the impacts of new development are mitigated through sustainable transport measures.

- To make it safer and more convenient for people to deliver goods and services to local businesses in the Borough.

Through improvements to distribution systems and the efficiencies that result, capacity for employment growth can be maintained and enhanced.

Monitoring

Indicator	Office and industrial employment in the Borough including strategic and locally significant employment locations.
Target	A net increase of 10,900 jobs in office and industrial employment out of a total increase in employment of 19,900 jobs by 2026.
Data Source	ONS.

Justification

- 5.4 In achieving sustainable communities and accommodating future growth, the Council wish to ensure there is sufficient employment capacity for industrial and commercial developments in accordance with Planning Policy Statement 1. Employment capacity is defined as land and floorspace to accommodate businesses and therefore jobs. An additional 19,900 jobs are projected in the Borough between 2006 and 2026 (GLA *Outer London: Issues for the London Plan 2007*). The Council will seek to maintain its employment role by protecting sufficient land to accommodate this growth.
- 5.5 The Mayor of London has identified key locations for office development including town centres, and strategically important industrial locations. There are also sites the Council has identified in the DPD as locally significant industrial sites, which together with strategic industrial locations act as a "reservoir" of industrial capacity.
- 5.6 Structural changes to the market with a general downturn in manufacturing have led to ageing stock, some of which lies vacant and underused. Through intensification and redevelopment, these sites can be brought back into use and employment capacity enhanced. Intensification of existing employment

sites can potentially facilitate the release of land to other uses, particularly housing.

- 5.7 Renewal and consolidation of the existing supply of offices and industrial land is emphasised at a regional level in the London Plan and at a sub regional level in the West London Sub Regional Development Framework, therefore justifying this approach.

E2 Locations for Employment

New employment floorspace with a high employment density and/or which attract a high number of visits (Offices, hotels and conference facilities) are to be directed to sustainable locations (Preferred Office Locations – refer to proposals map), which includes town centres (Hounslow, Chiswick, Brentford and Feltham) and Chiswick Business Park (Subject to Locational policies EP1, EP3). The expansion of existing offices in locations outside town centres and Chiswick Business Park should be limited and any development not limited in scale is to be directed to sustainable locations.

The release of existing offices will be managed to ensure there is sufficient supply to accommodate existing and future demand. A more flexible approach will be applied to the change of use from offices in locations outside town centres and key existing office locations (Chiswick Business Park, Bedfont Lakes and parts of the Great West Road).

New industrial and warehousing development will be directed to existing industrial locations. Strategic Industrial Locations (Preferred Industrial Locations at Brentford and North Feltham, Industrial Business Park on the Great West Road as identified on the Proposals map) and locally significant industrial sites (refer to the Proposals map) will be safeguarded with any change of use subject to criteria under policies EP6 and EP7. Any change of use of industrial land outside these locations will be assessed in accordance with the criteria under Policy EP8.

Employment uses that do not impact on the surrounding amenity will be encouraged in areas where there is a mix of uses and access by sustainable modes of transport, namely the Borough's 4 town centres.

In consideration of locations for employment, the Council will assess the impacts on the environment, economy, community and transport network, and ensure there is no harm on surrounding uses including nature conservation areas.

Implementation

- 6.1 The policy in directing new development, protecting strategic and locally significant sites and allowing the release (change of use) of employment land will be implemented through planning decisions. Improvements to transport proposed in the LIP 9 (see below), enable more sustainable transport and movement of freight, which can facilitate new business and development parallel to the policy's objectives of directing development and protecting employment in appropriate locations.

6.2 The Council will bring forward more detailed policies for the individual town centres and the PILs as part of the preparation of the Core Strategy, identifying their specific roles in providing for the future employment needs in the Borough.

6.3 Core Policy E2 will be implemented through:

- o *Local Implementation Plan (LIP), July 2007*

'Proposals' (General Statements of Intention) are set out in the LIP to implement the transport objectives that in turn contribute to delivery of the Mayor's Transport Strategy. Relevant proposals include but are not limited to the following:

- To work with the local business community to mitigate the impacts of congestion on the local economy

This proposal seeks to enhance access to business through accessibility, freight and area based schemes. This supplements Policy E2 that ensures uses are in appropriate locations.

- To minimise the environmental and safety impacts of freight vehicles particularly in residential areas

This proposal supplements Policy E3 of the DPD. The policy together with Locational Policy EP5 directs new development that generates freight movements to appropriate locations, whilst the proposal in the LIP seeks to mitigate the adverse effects of freight movements from existing and future development.

Monitoring

Indicator The amount of new office, hotel and conference floorspace directed to town centres and Chiswick Park as a proportion of all office, hotel and conference floorspace approved (permissions of more than 500 sq m).

Target At least 80% of floorspace for new office, hotel and conference uses is located in town centres or Chiswick Park as a proportion of all new floorspace approved for those uses (permissions of more than 500 sq m).

Data Source London Development Database.

Indicator The amount of new industrial and warehousing floorspace directed to existing industrial locations as a proportion of all new industrial and warehousing floorspace approved (permission of more than 500 sq m).

Target At least 80% of new floorspace for industry and warehousing is located in existing industrial areas as a proportion of all new floorspace approved in those categories (permissions of more than 500 sq m).

Data Source London Development Database.

Justification

- 6.4 The Mayor's London Plan, Sub Regional Development Framework for West London and the West London Economic Development Strategy identify town centres as the foci for growth and development to revitalize their role and function. Recent developments have contributed to the regeneration of Hounslow and Feltham Town Centres, with further development proposed in Hounslow Town Centre as a part of phase 2 of the Blenheim Centre. In Brentford, the Council is continuing to facilitate the redevelopment of the town centre, which is in need of renewal. Since high vacancies (Hounslow Employment Land Study 2004) indicate a proportion of the Borough's current office stock is currently not meeting business needs, investment in town centres is of crucial importance to the future of Hounslow's economy.
- 6.5 To rejuvenate the 4 town centres of Hounslow, Feltham Chiswick and Brentford, intensification and renewal of the existing office stock will be encouraged in these locations. They are locations that are more easily accessible by public transport than other parts of the Borough and this will enable residents to have sustainable journeys to work.
- 6.6 Although an "edge of centre" location (refer to Glossary), Chiswick Business Park is a strategically important location for offices, with public transport comparable to the Borough's town centres. The high quality accommodation of the business park has attracted a number of media companies and is important both locally and regionally.
- 6.7 There are parts of the Borough with low levels of public transport accessibility, particularly in the west at Bedfont Lakes and along the Great West Road, which encourages travel by car. The Great West Road has historically been a key location for large-scale offices, attracting firms such as GlaxoSmithKline and BSkyB to locate their headquarters along the 'Golden Mile', while the business park at Bedfont Lakes provides modern high tech buildings for international companies.
- 6.8 Whilst the offices on the Great West Road and at Bedfont Lakes continue to have an employment role, it is not currently sustainable to allow the further development of offices in these locations unless there are significant improvements to public transport consistent with the Mayor's London Plan. Improvements to transport in these locations is outside the scope of this development plan document, but at the current time no significant improvements are proposed to make the Great West Road and Bedfont Lakes sustainable locations.
- 6.9 The Mayor of London has identified the Heathrow Opportunity Area in the London Plan (Consolidated with Alterations since 2004). It incorporates Hayes, West Drayton, Southall, Feltham, Bedfont Lakes and Hounslow, where an indicative employment capacity of 11,000 and a minimum housing target of 10,750 homes have been identified, subject to developers'

contributions towards the transport system to support that level of growth. An Opportunity Area Planning Framework will be developed in conjunction with the Greater London Authority and the neighbouring boroughs of Hillingdon and Ealing. It will cover a range of employment issues and other matters which are outside the scope of an Employment DPD.

- 6.10 The other foci for employment growth are locations where there is good access to the strategic road network. Industrial and warehousing uses are generally in locations close to the strategic road network for ease of access to Central London, Heathrow, the South East and UK. Directing heavy goods vehicles movements, from existing and new development, away from congested local roads can avoid increased disturbance to local communities, already affected by significant levels of noise and poor air quality. Furthermore, industrial and warehousing uses do not generally have a high employment density and therefore do not generate a significant number of employee and visitor trips compared to an office or hotel. It is therefore not appropriate to direct such uses to town centres.
- 6.11 The London Plan identifies strategic locations for industrial uses including North Feltham Trading Estate, Brentford, and the Great West Road. In addition, the Borough has a number of industrial estates that are considered to be locally significant. Together with strategic locations and other industrial estates in the Borough, they provide a reservoir of industrial capacity in the Borough. Some locally significant industrial sites that contribute to the Borough's industrial capacity are not in the immediate vicinity of the strategic road network. However, they support local businesses that generally do not generate heavy vehicle movements and do not need to be close to major roads.
- 6.12 In addition, uses that do not require a high quality environment, for example those which generate significant levels of noise, will be directed to locations where their impact on residential and other sensitive uses will be minimised. Good design may overcome the need to separate such uses, but there is a need to ensure that any new development for businesses not requiring a high quality environment remains attractive and meets business needs.

E3 Local Employment Opportunities

The Council will work with partners to enhance local employment opportunities for residents through opportunities for enhancing the knowledge and skills of residents and retaining business in the Borough, which will enable more sustainable patterns of travel to work.

Implementation

- 7.1 The policy seeks to enhance local employment opportunities for residents through upskilling the population and retaining businesses in the Borough. This will be implemented primarily through implementation of the Council's Supplementary Planning Document on Planning Obligations, which provides guidance on when obligations will be sought from developers and how this will be spent. Contributions will be put towards training, childcare and job brokerage schemes to help people back to employment.
- 7.2 Section 106 contributions will also be sought towards the provision of affordable workspaces or business units for start up businesses or business development. In addition, the programmes of West London Business and Hounslow Chamber of Commerce in partnership with the Council's Economic Development Unit will support existing business and continue to attract new businesses to locate in the Borough.
- 7.3 The delivery of training/education by higher and further education providers will also support the policy of upskilling the population but the spatial implications of delivering training are outside the scope of the DPD and will be addressed as part of the Core Strategy.
- 7.4 Core Policy E3 will be implemented through:

- *Planning contributions*

The Council in negotiating planning obligations from proposed developments to offset resulting impacts will seek contributions towards the following in accordance with the Supplementary Planning Document on Planning Obligations:

Employment

- Childcare facilities
Provision of either on or off-site nursery facilities to enable parents greater opportunity to access employment opportunities.
- Construction training
Cost of construction training to be delivered by recognised providers
- Job brokerage.
To maximise employment opportunities for groups suffering difficulties accessing the local labour market.
- Training and education

To maximise training and education opportunities for Borough residents.

Transport

- Sustainable transport needs within the Borough based on trip generation. This will benefit residents through making employment opportunities more accessible, particularly in locations where there is limited public transport provision at the current time.

Further guidance is contained within the Council's Planning Obligations Supplementary Planning Document.

○ *Community Plan 2007 – 2010*

As set out in section 4, the Council and its partners, in seeking to achieve an 'economically active and skilled community' has objectives to:

- Increase skills attainment particularly at "NVQ level 3" by encouraging more young people into further education and apprenticeships and reducing the number of 16-18 year olds "Not in Employment, Education or Training" (NEET);
- Increase the number of Borough residents in paid work;
- Support local business growth and development, promoting the Borough to attract investment and development.

The Council will also seek to encourage more young people into Higher Education.

These objectives support the implementation of Policy E3 in the Development Plan Document and are implemented through other plans, strategies and mechanisms including the Children and Young People's Plan 2007 – 2010 referred to below.

○ *Hounslow Plan 2006 – 2010*

In achieving the priority of 'improving standards in schools' the Council has set a target of:

"...preparing our children and young people for a smooth and seamless transition to adulthood, independence, work and further education as well as promoting the economic wellbeing of families".

The relevant objectives to deliver this target also support implementation of Policy E3. The Council seeks to ensure young people have the opportunity to develop skills needed for the future and employment, and will therefore also encourage young people to enter on Higher education courses.

Adult learning is also important to enhancing local employment opportunities for residents. The Hounslow Plan delivers this DPD policy

through seeking fairness in the funding for adults seeking non-vocational training who are hard pressed and currently excluded from other funding.

○ *Children and Young People's Plan 2007 – 2010*

The Children and Young People's Plan sets out how the Council will achieve five outcomes of Be Healthy, Stay Safe, Enjoy & Achieve, Make a Positive Contribution and Achieve Economic Wellbeing.

In achieving economic wellbeing, a priority is to assist young people to move on successfully into adult life. This delivers not only the outcomes sought in the Hounslow Plan as referred to above and the Children and Young People's Plan, but also supports in implementation of Policy E3 in this development plan document.

In achieving this priority, the Children and Young Person's plan sets out the means for assisting young people into adult life. Those relevant to implementation of Policy E3 include (but are not limited to):

- Developing specialised diplomas, apprenticeships and other work based learning opportunities;
- Working with the Learning and Skills Council to increase the range of options available to young people;
- Provision of information, advance guidance and opportunities for young people through development of further services from organisations/agencies including schools and Connexions.

○ *Local Implementation Plan (LIP), July 2007*

'Proposals' (General statements of intention) are set out in the LIP to implement the transport objectives that in turn contribute to delivery of the Mayor's Transport Strategy. Relevant proposals include but are not limited to the following:

- To actively promote workplace travel plans at businesses throughout the Borough;
- To continue to promote sustainable transport to encourage modal choice.

○ *Business support*

The Council's Economic Development Unit in partnership with external agencies and West London Business will seek to retain and support successful local business through a range of measures including local programmes of business support such as:

- The established inward investment and property location service run by West London Business in partnership with Think London; and
- 'Hounslow for Business', run by Hounslow Chamber of Commerce, which helps start ups and recently established micro businesses to make sense of, access and benefit from various forms of existing business support (e.g. finance, marketing advice, legal advice, etc).

o *Local Area Agreement*

The outcomes of the Local Agreement relevant to the implementation of this policy are:

- Assisting people from economically disadvantaged groups into sustained work through outreach and job-brokerage with employers;
- Developing a strategy for in-work skills and job progression through basic skills training for work-readiness and level 2 and 3 vocational training, particularly for those in work;
- Identifying and addressing barriers to growth for small and medium sized businesses to promote economic activity and help retain jobs in the area.

These outcomes and the actions required to achieve these outcomes are co-ordinated by the Economic Development unit of the Council. Indicators and targets to monitor the achievement of LAA targets are included below.

o *Business retention programme of West London Business (work forming part of Hounslow's Local Area Agreement)*

West London Business is delivering a business retention intervention programme for Hounslow. The priorities are to retain 'at risk' businesses and support the growth of those businesses with the highest potential (translating into jobs, both safeguarded and new). Retaining and enhancing job opportunities in the Borough can facilitate the provision of employment for local people.

o *Proposed London Skills and Employment Board (LSEB) Strategy*

A long-term skills and employment strategy for London, it will focus on improving skills and in identifying ways of tackling worklessness and ensuring the current and future needs of employers can be met. The Core Strategy will deliver on any spatial elements of the LSEB strategy, the outcomes of which will support delivery of Policy E3.

o *West London Working (City Strategy Pathfinder) (WLW)*

The objectives of WLW are to increase the number of residents in employment and to make children better off by helping their parents move into sustainable employment by 2012. The Core Strategy will deliver on any spatial elements of WLW, the outcomes of which will support delivery of Policy E3.

Monitoring

Indicator	Distance travelled to work by method of travel to work.
Target	Increase in proportion of people who travel less than 5 km by sustainable modes of transport to work ¹ .

¹ Underground, metro, light rail, tram; train; bus, mini-bus, coach; bicycle; on-foot

Data Source	Neighbourhood statistics.
Indicator	Proportion of population that is economically active.
Target	Increase in proportion of population that is economically active from the previous year (78.1% in period Jul 2006 – Jun 2007).
Data Source	ONS Annual Population Survey.
Indicator	Proportion of population with NVQ3 and above and proportion of population with no qualifications.
Target	Increase in proportion of population with NVQ3 and above relative to previous year (48.4% in 2006) and decrease in proportion of population with no qualifications relative to previous year (11.2% in 2006).
Data Source	ONS Annual Population Survey.
Indicator	Number of jobs safeguarded/ created under the West London Business Inward Investment and Business Retention Programme (under LDA contract).
Target	Targets reflect those of WLB for the next 3-year period (jobs safeguarded and created within the next 3 years as per the contract between WLB and the LDA).
Data Source	West London Business.

Justification

- 7.5 Local employment opportunities for residents will be supported by the Council, consistent with objective 4 and spatial policy E1 of maintaining and enhancing employment capacity in the Borough.
- 7.6 The basis for this policy is to improve the low skills levels of residents and the vulnerability of the low skilled to unemployment in times of recession or industrial restructuring, whilst also supporting businesses that have unmet demands for labour. This is consistent with the aim in the West London Economic Development Strategy to remove barriers in order to improve training and access to employment for currently disadvantaged groups.
- 7.7 There appears to be a high proportion of residents currently seeking work, perhaps as many as 16% of the workforce (Labour Force survey Jan 2007). Although other statistics suggest there is a tight labour market (i.e. a relatively high proportion of jobs relative to working age population in Hounslow compared to the UK), there is still scope for helping more residents into paid employment.
- 7.8 Hounslow's labour force also has a disproportionate number of people with low qualification levels (Learning and Skills Council Needs analysis 2002). This may or may not be an effect of the equally large proportion of low skilled jobs (Labour Market Tables, Jan 2007) in the local economy, of which the majority are related to Heathrow Airport. However, the low level of skills, particularly in the west of the Borough has a number of implications. There is

an immediate effect in that take home pay and household incomes are low as highlighted in the GLA Economics Current Issues Note 14 *Patterns of low pay in London* (March 2007).

- 7.9 In the longer term, if the need for low skilled jobs diminishes, there would be higher unemployment. Many of the existing employment opportunities and labour shortages are in higher skilled areas according to the Learning and Skills Council Needs analysis (2002), which concludes that businesses in West London are more likely to report a skills shortage in their workforce than any other London LSC area. This is likely to be a reason for a net increase in the daytime population (3.4% increase relative to the resident population aged 16 – 75 – Census 2001). The means of addressing this are set out in the Implementation section below.

E4 Diversity in Employment

Diversity will be encouraged through promoting small and medium sized enterprises (SMEs) in growth sectors.

A range of business activities will be encouraged to avoid over-reliance on any one industry.

Implementation

8.1 The promotion of SMEs will be implemented through planning decisions on applications for new development. Furthermore, the work of West London Business and Hounslow Chamber of Commerce in partnership with the Council supports delivery of the policy through their programmes for business retention and attracting new business, particularly SMEs.

8.2 Core Policy E4 will be implemented through

- *Planning contributions*

The Council, in negotiating planning obligations from a proposed development to offset impacts arising, will seek contributions towards employment, education, training and childcare in accordance with the Supplementary Planning Document on Planning Obligations. Contributions towards employment may include the provision of affordable workspaces or business units for start up businesses or business development.

Whilst there may not be a constraint on rent, reference can be made to the rent charged by others who provide similar accommodation for new businesses within the Council's area, ensuring units are of a small size (no more than 50 m²) and have short, easy to break lease terms (3 year maximum terms with a 3 year break option).

- *Local Area Agreement*

The outcomes of the Local Area Agreement relevant to the implementation of this policy are:

- Identifying and addressing barriers to growth for small and medium sized businesses to promote economic activity and help retain jobs in the area.

These outcomes and the actions required to achieve these outcomes are co-ordinated by the Economic Development unit of the Council. Indicators and targets to monitor the achievement of LAA targets are included below.

- *Business retention programme of West London Business (work forming part of Hounslow's Local Area Agreement)*

West London Business is delivering a business retention intervention programme for Hounslow. The priorities are to retain 'at risk' businesses and support the growth of those businesses with the highest potential (translating into jobs, both safeguarded and new). The first stage of this work has involved identifying the location, size, type and sector of Hounslow's small and medium sized enterprises. On this basis the programme of supporting SMEs will develop in accordance with Policy E3.

Monitoring

Indicator	Number of small and medium sized enterprises in the Borough.
Target	Increase in the number of small and medium sized enterprises in the Borough.
Data Source	Annual Business Inquiry.

Justification

- 8.3 The policy reflects a strategic direction set out in the London Plan that seeks to strengthen the diversity of London's economy and encourage the development of small business including ethnic minority businesses, which are becoming increasingly important to the local economy.
- 8.4 The business structure of the Borough shows that the overwhelming majority (99%) of businesses are SMEs, of which 85% employ between 1 and 10 (2005). Since 2003, there has been a 5% increase in the number of businesses of between 1 – 10 employees (small businesses). Whilst there has been a decrease in the number of businesses between 11 – 199 employees (medium sized business) (Annual Business Inquiry 2005), the overall number of small and medium sized enterprises (1 – 199 employees) has increased by 4% due to the increase in businesses of 1 – 10 employees (small businesses).
- 8.5 Small and medium-sized enterprises (SMEs) will continue to provide the majority of workplaces in the Borough's economy despite the presence of some major international companies. The continuing support for the development of start up and small business is important in sustaining economic diversity. Roger Tym's study *The demand for premises of London's SMEs* (2006) states that there is an argument for 'supporting small and new firms in general, because they make major contributions to innovation and competition and through these to the efficiency of the economy as a whole'.
- 8.6 Accommodating the different needs of business in spatial terms requires diversity in provision. A key factor in achieving business growth is the availability of suitable premises, according to research by Strategem (*Business Mapping and Research to Prevent Business Failure and Encourage Business Growth in Hounslow*, Jan 2006). The ability for a company to innovate was also considered vital to its long-term growth.

- 8.7 Economic diversity is also important in respect of avoiding over-reliance on any one sector. Heathrow has a significant impact on the Borough's labour market; 1 in 10 jobs or 11% of residents in the west of the Borough work at the airport (West Area Study 2005). However, the employment associated with Heathrow is considered to be much higher with a large number of businesses related to the airport's operation located in the west of the Borough.
- 8.8 The *Hounslow Employment Land Study 2004* found that 10% of businesses surveyed had an "obvious relationship" with the airport, a higher proportion being in the west (13% of businesses in the western part of the Borough). This was considered to be an underestimate of the amount of airport related floorspace, and concluded that the 'Heathrow Effect' was significant. This is reflected in the dominance of warehousing and logistics on industrial estates in the vicinity of the airport as well as the presence of hotels and service related uses on the A4.
- 8.9 The location of Heathrow adjacent to Hounslow is likely to be a reason for the hotel and restaurant sector being the largest in terms of number of businesses (Strategem 2007).
- 8.10 The current employment structure of the Borough shows that 92.5% of jobs are in service related industries, considerably more than the UK average (Nomis 2006). The service sector includes distribution; hotels & restaurants; transport & communications; finance, IT and other business activities; public administration, education and health, as well as other services.
- 8.11 A recent study of businesses in Hounslow for West London Business (2007) highlighted growth in a number of particular service industries including transport, storage and communications; personal and household services; financial and business services; health, creative media; and education and social services. This reflects the shift away from traditional industries such as manufacturing and the emergence of a knowledge economy. The DPD needs to be flexible to accommodate structural and market changes in the economy, whilst seeking to retain diversity in employment thus providing a range of opportunities for local people.

LOCATIONAL POLICIES

EP1 Location of New Office-Based Employment

Proposals for new office floorspace will be directed to the Borough's 4 town centres (Hounslow, Chiswick, Brentford and Feltham – Refer to Proposals Map) and Chiswick Business Park (Preferred Office Locations – Refer to Proposals Map) unless the proposed floorspace is limited in scale (less than or equal to 200 sq m or 25% of the existing office floorspace whichever is the lower) and/or ancillary to the primary use of the site.

Where net additional floorspace exceeding 200 sq m or 25% of the existing office floorspace is proposed (whichever is the lower) in the redevelopment or extension of a building in locations outside town centres and Chiswick Business Park, it will need to be demonstrated that there are:

- no sites available in the town centres followed by edge of centre locations²;
- there is a demonstrated need; and
- the site is or will be made accessible by sustainable modes of transport.

Implementation

- 9.1 The policy's aim is to ensure new development is appropriately located in accordance with national and regional guidance. Renewal of existing offices in town centres is the key to their regeneration through intensification and the more efficient use of office stock. The Council will therefore ensure proposals are directed to town centres, the policy being implemented through planning decisions.

Monitoring

Indicator	Proportion of approved office floorspace in town centres and Chiswick Park relative to total office floorspace approved in the Borough (permissions for more than 500 sq m of B1a).
Target	Relative to the total office floorspace approved in the Borough, at least 90% of approved office floorspace (permissions of more than 500 sq m of b1a) shall be within town centres and Chiswick Business Park.
Data Source	London Development Database.

² 'Edge of Centre' is defined for office development as locations within 300 m of a town centre boundary and/or within 500 metres of a public transport interchange, including railway and bus stations, within the urban area for purposes of the sequential approach.

Justification

- 9.2 Offices in the Borough's four town centres are located above shops and in freestanding buildings, providing accommodation for a range of businesses serving Hounslow and West London. There are currently high levels of office vacancies in the town centres. However, there are signs of an upturn in the economy (London Office Policy Review 2007 para 4.5.1) and growth in service sectors. The projected growth in employment between 2006 and 2026 is predominantly in financial and business services (FBS) with 13,804 additional jobs between 2006 and 2026 (GLA *Office Policy Review 2007*, Table 13.4).
- 9.3 Based on projected growth in Financial and Business services of 13,804 to 2026 (Office Policy Review 2007), there is the need to accommodate 207,760 sq m of floorspace using the GLA's preferred scenario (Table 3.8 of London Office Policy Review 2007). This equates to 135,219 sq m by 2018, the period of the Employment DPD. The *Hounslow Employment Land Study 2004* concluded that the growth could be accommodated in small-scale high street space with no need for new office stock; completion of existing permissions and commitments including Chiswick Business Park; and the more efficient use of existing space. Furthermore, it is recognised that growth in Financial and Business services may be retail-orientated business services, which are more likely to occupy premises with non-B Class uses (Hounslow ELS, 2004). An assessment in light of the revised projections in the London Office Policy Review 2007 has identified capacity to accommodate growth in the life of the Plan including permissions unimplemented and under construction together with vacant floorspace on the market.
- 9.4 To ensure the supply of premises is suitable for business needs, renewal including redevelopment of existing offices is encouraged. Due to the high vacancy levels and collection of older office stock in the four town centres, there is a need for renewal and consolidation to attract business to these locations, which remain the most sustainable in terms of public transport accessibility.
- 9.5 The London Office Policy Review 2006 assessed the viability of office locations and concluded that speculative office development could be promoted on the "most efficient and accessible sites" including Chiswick, Brentford and Hounslow Town Centres and at Chiswick Business Park.
- 9.6 Whilst in an edge of centre location, Chiswick Business Park is a strategically important location for offices with public transport accessibility comparable to the Boroughs town centres, which will be enhanced with a bus transfer interchange. The scale and high quality accommodation of the business park has created significant growth and attracted a number of media companies. This contributes to the location's strategic importance in the Hounslow and London office market.
- 9.7 The GLA's Office Policy Review identified other locations including the Golden Mile as appropriate for office provision as part of wider mixed-use

developments. The Great West Road has historically been a key employment location for business and the existing office buildings continue to provide many jobs. However, there is relatively poor public transport and until significant improvements are implemented, the 'Golden Mile' will continue to be a car based office environment, inappropriate for new office development. This is also applicable to the business park at Bedfont Lakes, which is even more dependent upon car use. Improvements to transport in these locations is outside the scope of this development plan document, but at the current time no significant improvements are proposed to make the Great West Road and Bedfont Lakes sustainable locations.

- 9.8 Outside town centres and the Key Existing Office Locations at Chiswick Business Park, Bedfont Lakes and on the Great West Road, there are small businesses, which contribute to the diversity of the local economy. Whilst not necessarily the most attractive or accessible commercial locations they provide employment opportunities in the suburbs, therefore supporting 'sustainable suburbs' consistent with Policy 2A.6 of the London Plan. The Council will allow for a small level of expansion in small and start up enterprises to enable their growth and survival without having to relocate. Such flexibility is consistent with spatial policy E4 of the DPD. The level of expansion will be limited to an increase in office floorspace of 200 sq m or 25% whichever is the lower.
- 9.9 To allow any more development than this in locations not as accessible by sustainable transport as town centres or Chiswick Business Park encourages car use. This is consistent with the approach set out in government guidance and would otherwise cause harm to the environment and communities. Furthermore, employment growth outside the Borough's town centres and Chiswick Business Park could cause harm to the town centres as foci for employment. This is a key theme in Planning Policy Statement 6 'Planning for Town Centres'. The basis for a threshold of 200 sq m is in PPS6, which states "the sequential approach is only a relevant consideration in relation to extensions where the gross floor space of the proposed extension exceeds 200 square metres".
- 9.10 The only other instance where proposals for net additional floorspace exceeding 200 sq m or 25% of the existing office floorspace (whichever is the lower) is acceptable will be where the office floorspace is ancillary to the primary use of the site. An assessment of whether the proposed office floorspace is ancillary will be based on the nature and activities of the business, the scale including quantum of floorspace and proportion relative to the total floorspace. Planning Policy Statement 6 provides guidance on determining whether a retail use is ancillary, which is also considered relevant to other town centre uses including offices. PPS6 states "*Local planning authorities should ensure that in such cases the retail element is limited in scale and genuinely ancillary to the main development, and should seek to control this through the use of conditions*". A standard condition used by the Council is referred to in the Implementation section above.

EP2 Change of Use from Offices in Town Centres and Key Existing Office Locations on the Great West Road and at Bedfont Lakes

In town centres and at Key Existing Office Locations on the Great West Road and at Bedfont Lakes (Refer to Proposals Map) a change of use from offices will be acceptable if evidence is provided of active marketing of the site for offices for a period of at least two years.

Proposals for the redevelopment of office floorspace for a mix of uses where the above criteria are not met will only be considered appropriate where it can be demonstrated that the equivalent number of jobs can be provided.

Implementation

- 10.1 To ensure town centres retain their employment function and the key office locations at Bedfont Lakes and on the Great West Road continue to support business, the Council will manage any release to other uses in the Borough's key office locations through assessing evidence on demand submitted as part of planning applications.

Monitoring

Indicator	Proportion of office floorspace lost through the granting of planning permission (permissions of more than 500 sq m) in town centres and Key Existing Office Locations at Bedfont Lakes and on the Great West Road relative to the Borough as a whole.
Target	Relative to the Borough as a whole no more than 20% of office floorspace lost through the granting of planning permission (permissions of more than 500 sq m) shall be in town centres and Key Existing Office Locations at Bedfont Lakes and on the Great West Road.
Data Source	London Development Database.

Justification

- 10.2 The London office market driven by cyclical change in the wider economy (London Office Policy Review 2006) is recovering and 'appears to be entering a growth phase'. It is therefore important to ensure viable office locations are maintained where future growth can be accommodated. Town centres are the foci for new office development as defined in Planning Policy Statement 6. Any significant further loss of floorspace in town centres will hinder their future as foci for office based employment. It is therefore important to manage any release of stock and require evidence that there is no current or reasonably foreseeable potential demand (see 10.4 below).

- 10.3 Outside town centres, the Great West Road area and Bedfont Lakes Business Park serve a strategic role in providing office floorspace for businesses that demand large floor plates, modern accommodation and a prominent location. Whilst these locations do not have good levels of accessibility by public or other sustainable modes of transport, the offices on the Great West Road and at Bedfont Lakes make a significant contribution to the local and regional economy. Their release must therefore be managed appropriately.
- 10.4 To demonstrate that there is no demand for office floorspace in town centres and at the Key Existing Office Locations on the Great West Road and Bedfont Lakes, a requirement for evidence of 2 years active marketing is considered to be appropriate. This provides sufficient time to ‘test’ the market and to allow for changes in market conditions. Whilst there is not specific guidance on an appropriate period for marketing with regard to offices, the Mayor’s SPG on Industrial Capacity (2008) identifies relevant criteria for inclusion in policies. Amongst these criteria, it is suggested that a site should have been “adequately marketed through a commercial agent at a price that reflects market value (for industrial use) for a reasonable period (normally at least two years)”.
- 10.5 The Mayor of London’s Technical Report Eleven to the London Plan (August 2002) titled “A City of Villages: Promoting a sustainable future for London’s suburbs”, suggests the relocation of employment sites to housing should be resisted unless vacant for 5 years. The policy context has changed as outlined in Section 4 and given current demand and supply 5 years is considered to be too long. It does not allow for flexibility in managing the release of employment land and retaining vacant and/or derelict land for this period is not considered sustainable. Through marketing, demand for the premises can be determined whilst not leaving a site redundant.
- 10.6 The evidence of active marketing should include information on the history of marketing; agent(s) and media used (press articles and advertisements); interest in the site/premises (including reasons for prospective tenants not taking up space and how these problems have been addressed); evidence that the rental levels offered have been competitive (including the offer of renewal of lease to existing tenants at a reasonable market rate); and flexibility in space offered, including dividing up large areas of floorspace where this is possible. It is proposed that a checklist will be developed to appraise evidence of marketing and to ensure consistency in the approach taken. The Council must be satisfied that the evidence received is robust and the information is presented in a way that is clear to Members, officers and the public.

EP3 Chiswick Business Park

The change of use from offices or other complementary uses will only be permitted at Chiswick Business Park (Refer to Proposals Map) if the proposed use directly contributes to the function of the business park as a sustainable strategic office location.

Implementation

- 11.1 Chiswick Business Park serves a key role in meeting the needs of business, and to ensure the business park retains its status as a sustainable strategic office location, the Council will implement this policy in its planning decisions on applications for a loss of office floorspace.

Monitoring

Indicator	Total B1a floorspace within Chiswick Business Park.
Target	Total B1a floorspace within Chiswick Business Park does not fall below 180,000 sq m unless it contributes to its function as a sustainable strategic office location.
Data Source	London Development Database.

Justification

- 11.2 Chiswick Business Park is a mid urban business park in an edge of centre location, being less than 500 m from Gunnersbury Station, a transport interchange for underground, national rail and bus services (refer to Annex A, Table 2, PPS6). Whilst in an edge of centre location (refer to Glossary), Chiswick Business Park is a strategically important location for offices with public transport accessibility comparable with the Borough's town centres, which is to be enhanced with a bus transfer interchange. The high quality accommodation of the business park, which has supported significant growth and attracted a number of media companies, contributes to its importance in a London and Hounslow context.
- 11.3 Over 180,781 sq m of development has been approved at Chiswick Business Park (Sustainable Development Committee Report 28th March 2007 – Chiswick Business Park, Chiswick High Road), which could potentially accommodate 9,000 people. The approved office floorspace not yet implemented at Chiswick Business Park contributes to the supply required to meet the Borough's needs to 2026. Given its role, the change of use from offices or other complementary uses will be restricted to uses ancillary to the function of the Key Existing Office Location.

EP4 Change of Use from Offices (Outside Town Centres and Key Existing Office Locations)

A change of use of an office site/ building outside a town centre or Key Existing Office Location (refer to Annex 1 and Proposals Map) will be acceptable if:

- a. the existing use of the site for office is detrimental to amenity of the surrounding area,

OR

- b. evidence is provided of the active marketing of the site for offices for a period of at least one year;

AND

- c. the proposed use is compatible with the amenity of the surrounding area.

Implementation

- 12.1 Small-scale offices in the suburbs and other out of centre locations play an important role in providing local based employment close to where people live. To ensure the employment role of the suburbs is not lost unnecessarily, the Council will manage the release of offices in locations outside the existing Key Office Locations to other uses through assessing evidence of demand submitted as part of planning applications.

Monitoring

Indicator	Proportion of office floorspace lost through the granting of planning permission (permissions of more than 500 sq m) in locations outside town centres and Key Existing Office Locations (Bedfont Lakes, Great West Road and Chiswick Park) relative to the Borough as a whole.
Target	Relative to the Borough as a whole, at least 80% of office floorspace lost through the granting of planning permission (permissions of more than 500 sq m) shall be outside town centres and Key Existing Office Locations (Bedfont Lakes, Great West Road and Chiswick Park).
Data Source	London Development Database.

Justification

- 12.2 There are offices located outside the Borough's town centres and Key Existing Office Locations, the majority of which date from the 1950s and

1960s when there was demand. However, there was a significant downturn in the outer London office market in the late 1990s, which coincided with changes in planning policy directing offices to town centres in the first instance.

- 12.3 Whilst there has been little evidence of recent demand, offices in out-of-centre locations continue to, or retain the potential to, contribute to the local economy, jobs and prosperity. A good stock of alternative types of office space is required to meet the ever-changing needs of business in terms of size, location and cost, and this should be protected. It is important therefore to demonstrate that a particular space is not lettable for the foreseeable future if it is to be released for non-office use.
- 12.4 The release of offices will consequently be managed to ensure that there is sufficient stock available in the future to accommodate any increase in demand that cannot be accommodated in the Borough's town centres or Key Existing Office Locations. When a change of use from offices is proposed, it will be necessary to provide evidence that there has been no demand for at least 1 year.
- 12.5 It is not considered appropriate to require evidence of active marketing over a 2-year period as required by EP2. Office buildings outside town centres and Key Existing Office Locations are not in sustainable locations and are not clearly defined. Whilst they may contribute to the economy, jobs and prosperity, office buildings outside town centres and Key Existing Office Locations are not sequentially preferable locations and are not considered to be strategically important. The requirement for marketing is therefore not as stringent, with evidence of active marketing for 1 year required, but allows the release of office floorspace to be managed appropriately.
- 12.6 The evidence of active marketing should include information on the history of marketing; agent(s) and media used (press articles and advertisements); interest in the site/premises (including reasons for prospective tenants not taking up space and how these problems have been addressed); evidence that the rental levels offered have been competitive (including the offer of renewal of lease to existing tenants at a reasonable market rate) and flexibility in space offered including dividing up large areas of floorspace where this is possible. It is proposed that a checklist will be developed to appraise evidence of marketing and to ensure consistency in the approach taken. The Council must be satisfied that the evidence received is robust and the information is presented in a way that is clear to Members, officers and the public.
- 12.7 This approach is a realistic response to local market conditions and recognises in accordance with national and regional planning policies that the rejuvenation of offices, especially in the suburbs, should be focused on existing town centres. The re-development of out-of-centre offices for residential or other uses will continue to be one of the key options for the renewal of vacant buildings and sites. That is provided it is satisfactorily

demonstrated in each individual case that demand no longer exists for its continued use as offices.

EP5 Location of New Industrial/ Warehousing and Related Uses

Proposals for new industrial/warehousing and related development will be directed to the Borough's 'Preferred Industrial Locations' (PIL), 'Industrial Business Parks' (IBP), 'Locally Significant Industrial Sites' (LSIS) (refer to Annex 1 and Proposals map) and other existing industrial sites subject to being compatible with uses surrounding the proposal.

Where proposals for new development are proposed outside these locations, the Council will make an assessment against the following criteria:

- Compatibility with uses in the area surrounding the proposal and potential impacts on those uses;
- Capacity and impact on the road network and access by sustainable modes of transport.

Implementation

- 13.1 The need for redevelopment and renewal of industrial land across the Borough to meet the demands of business requires that new development is directed to existing industrial locations. This policy will be implemented through planning decisions on applications for new development.

Monitoring

Indicator	Industrial (B1b, B1c, B2) and warehousing (B8) floorspace (gross internal) completed within the Borough's SILs, LSISs and other existing industrial sites as a proportion of all completed industrial and warehousing floorspace in the Borough.
Target	100% of the total industrial/warehousing and related employment floorspace completed within SILs, LSISs and other existing industrial sites as a proportion of the total.
Data Source	London Development Database.

Justification

- 13.2 The decline in manufacturing and the growth in logistics/ warehousing, reflecting the Borough's location close to Heathrow and the strategic road network is expected to continue. The restructuring of the market is reflected in the majority (95%) of developments in the B2 and B8 use classes being for warehousing since 2001 (London Development Database report).

- 13.3 The Council will direct new development to SILs and LSISs identified on the Proposals map and other existing industrial estates. Existing industrial sites including SILs, LSISs and other existing industrial estates provide a reservoir of industrial capacity and can be strengthened by directing new industrial and warehousing development to these locations, therefore enhancing their offer.
- 13.4 All industrial areas provide employment and, whilst the value that they provide has not been quantified, their capacity to accommodate economic development makes a significant contribution to the local economy.
- 13.5 Directing demand to only SILs and LSISs could harm the offer of other industrial areas in the Borough and potentially constrain sustainable economic growth. Therefore, where proposals are made for B2 and B8 development outside the preferred locations these will be considered against the specified criteria.

EP6 Preferred Industrial Locations and Locally Significant Industrial Sites

The Council will promote, manage and where necessary protect Preferred Industrial Locations and Locally Significant Industrial Sites (Refer to Annex 1 and Proposals Map) for industrial uses, warehousing and related uses including waste facilities.

Redevelopment and/or a change of use of land and/or buildings from industrial, warehousing and related uses in a Preferred Industrial Location or Locally Significant Industrial Site will be acceptable subject to the following criteria:

- the primary function of the PIL or LSIS for industrial uses is not undermined;

AND

- there is no significant net loss of industrial capacity.

The Council will keep under review the supply and demand for industrial land and buildings, and the scope for consolidating industrial capacity at appropriate locations.

Proposals for office development (B1a) in Preferred Industrial Locations and Locally Significant Industrial Sites will be subject to locational policy EP1 unless it supports the primary use of the premises for industrial, warehousing and related uses.

Implementation

- 14.1 The policy seeks to protect and manage industrial capacity in strategic and locally significant industrial locations, which will be implemented through planning decisions.

Monitoring

Indicator	Industrial/ warehousing floorspace protected in each PIL and LSIS as a proportion of the total floorspace in each PIL and LSIS in the life of the plan.
Target	At least 90% of the industrial/ warehousing floorspace within each PIL and LSIS is protected in the life of the plan.
Data Source	London Development Database.

Indicator	Industrial/ warehousing land protected in each PIL and LSIS as a proportion of the total land area in each PIL and LSIS.
Target	At least 90% of industrial/ warehousing land within each PIL and LSIS is protected in the life of the plan.
Data Source	London Development Database.

Justification

- 14.2 The Preferred Industrial Locations (PILs) act as the strategic reservoir for industrial capacity in West London. The London Plan identifies two PILs in Hounslow, North Feltham Trading Estate and Brentford. In accordance with the London Plan, the boundaries of the two PILs are defined on the Proposals Map. PILs are designated for industrial uses that do not require a high quality environment. Such uses may require heavy goods access by road, rail and/or water, need to operate outside of normal business hours, and require sufficient distance or other barriers from noise sensitive uses.
- 14.3 As the purpose of PILs is to retain industrial capacity, the existing uses within the PIL boundaries should reflect their role and function.
- 14.4 The North Feltham PIL consists of 2 distinct clusters of industrial and warehousing uses, many of which depend in part or wholly on the airport. The redevelopment of parts of the North Feltham SIL for industrial and warehousing uses, and the high land values for warehousing close to the airport demonstrates that there is short to medium term demand. Good access to the strategic road network, proximity to the airport and good access into and through the estates comprising the North Feltham SIL contribute to its strategic role in providing industrial capacity.
- 14.5 The Brentford PIL comprises 2 distinct clusters to the north (Transport Avenue) and south (Commerce Road - part) of the Great West Road.
- 14.6 The northern part benefits from access by road (A4), rail and potentially canal (Grand Union Canal), and includes a refuse transfer station and industrial related uses. The site's separation from residential uses contributes to it being a prime location for industrial activities that do not require a high quality environment and this is reflected in occupation by businesses that would otherwise cause disturbance.
- 14.7 The southern part of the SIL off Commerce Road contains a mix of industrial and warehousing buildings. The site has access to the A4 via Brentford.
- 14.8 The Council has also identified Locally Significant Industrial Sites that are considered to be important in providing capacity to accommodate future industrial and warehousing employment growth. A number of these sites identified as locally significant are sufficiently close together to form important local employment clusters. The Mayor's SPG to the London Plan on Industrial Capacity (2008) states that Locally Significant Industrial Sites will be afforded the same level of protection as Strategic Industrial Locations

(Preferred Industrial Locations and Industrial Business Parks) and the Mayor will provide strategic support for boroughs to resist their development for non-industrial uses.

- 14.9 Sites have been identified as Locally Significant following an assessment of their locational characteristics, and function in the context of the local economy and demand, based on a review of employment land (*Hounslow Employment Land Study 2004*).
- 14.10 The Employment Land Study cited above identified significant demand for land in the west of the Borough related to the airport, which is reflected in very high land values for warehousing. The value of land influences the viability of end uses of industrial sites in the areas closest to Heathrow. Businesses that do not depend on proximity to the airport generally locate elsewhere for reasons of cost. This is generally further east or west beyond Greater London.
- 14.11 As opportunities for local businesses that are not airport related are constrained by the high land values in the west, there is a need for capacity in other areas of the Borough to accommodate new business and growth in existing businesses. This is proposed through the designation of sites in the eastern part of the Borough.
- 14.12 To support businesses not serving Heathrow and ensure there is capacity to accommodate further growth not related to the airport, there is a need to retain land in industrial use across the Borough. This reflects spatial policies E1, that seeks to maintain employment capacity, and E4, that supports diversity and avoiding over reliance on one sector.
- 14.13 Industrial employment is projected to decline from 25,400 to 22,500 jobs between 2006 and 2026. The GLA background report *London Industrial Land Release Benchmarks (April 2007)* uses the GLA Economics projections of industrial employment to forecast the land demand for the same period putting forward benchmarks for the release of land. The benchmarks are explained below and are summarised in the Mayor's SPG on Industrial Capacity (2008).
- 14.14 The supply of industrial/warehousing land in West London is limited and there is the need to retain industrial capacity to accommodate existing and future demand. Indicative land release benchmarks have been identified in the Mayor's SPG on Industrial Capacity (2008) with West London's benchmark being 52 hectares for the period 2006 – 2026 (2.6 hectares per annum). If the seven boroughs in West London divided this proportionally, Hounslow's benchmark for the release of land would be 0.37 ha per annum.
- 14.15 The benchmarks for the release of industrial land include provision for waste facilities, in order to ensure adequate capacity to meet the demand for waste sites, together with logistics and other growth industries. The London Plan 2008 incorporates the latest waste apportionment figures and the new benchmark figures for potential release of industrial land.

14.16 The following table summarises the benchmarks for release of industrial land across West London:

<i>Sub region</i>	<i>2001 - 2006 (ha)</i>	<i>2006 - 2011 (ha)</i>	<i>2011 - 2016 (ha)</i>	<i>2016 - 2021 (ha)</i>	<i>2021 - 2026 (ha)</i>	<i>Total 2006 - 2026 (ha)</i>
West	55	15	15	11	11	52

14.17 In the Mayor’s SPG on Industrial Capacity (2008) Hounslow is identified in a ‘Restrictive Transfer’ category. This is supported in the Borough’s own review of supply and demand. The *Hounslow Employment Land Study 2004* suggested that Hounslow should be towards the more ‘restrictive’ end of the ‘limited transfer’ banding.

14.18 The SPG states “*Boroughs within this category are encouraged to adopt a more restrictive approach to the transfer of industrial sites to other uses*” (page 25).

14.19 The main themes summarising the change from limited to restrictive are summarised in the Mayor’s background study *London Industrial Land Release Benchmarks (2007)*:

No excess vacant industrial land. Strong positive demand for waste and strong demand for logistics influenced by proximity of Heathrow. Suggest move to restricted.

14.20 The supply of industrial land and amount lost to non-industrial uses will need to be reviewed on a regular basis to ensure that the release of land is managed appropriately.

14.21 The SIL framework establishes a hierarchy and it is considered important to retain industrial capacity in strategic and locally significant locations. The amount of industrial capacity identified for protection is considered to be sufficient to meet demand and addresses the need for a restrictive approach in light of research at a strategic and local level. Any significant release should be in other industrial estates and managed through the implementation of locational policy EP8.

14.22 Significant net loss of industrial capacity is the net loss of floorspace, land (ha) and jobs, which would harm the integrity of a site for its industrial uses. If there is a need for additional land to meet demand in the Borough for industrial/ warehouse uses, any loss of jobs, floorspace and/ or site area will be considered significant.

EP7 Industrial Business Park (Great West Road)

The Council will promote, manage and where necessary protect the Great West Road Industrial Business Park (Refer to Proposals Map) as a location for industrial uses including research and development and industrial-related uses that require better quality surroundings.

A change of use from industrial uses in the Great West Road Industrial Business Park will be acceptable subject to the following criteria:

the primary function of the IBP for industrial uses is not undermined;

AND

there is no significant net loss of industrial capacity.

The Council will keep under review the supply and demand for industrial land and buildings, and the scope for consolidating industrial capacity at appropriate locations.

Proposals for office development (B1a) in the Industrial Business Park will be subject to Locational policy EP1 unless it is ancillary to the primary use of the premises for industrial and related uses.

Implementation

- 15.1 The policy seeks to protect and manage industrial capacity in the Borough's Industrial Business Park, which will be implemented through planning decisions.

Monitoring

Indicator B1b, B1c and B2 floorspace protected in the Great West Road IBP as a proportion of the total floorspace within the Great West Road IBP in the life of the plan.

Target At least 90% of the floorspace in B1b, B1c and B2 use in the Great West Road IBP is protected during the lifetime of the plan.

Data Source London Development Database.

Indicator Land in B1b, B1c and B2 use protected in the Great West Road IBP as a proportion of the total land area within the Great West Road IBP.

Target At least 90% of the land in B1b, B1c and B2 use in the Great West Road IBP is protected in the life of the plan.

Data Source London Development Database.

Justification

- 15.2 The Great West Road has historically acted as a key employment location for business.
- 15.3 There are clusters of offices, industrial and warehousing uses along the Great West Road, as well as a range of other uses, including out of centre retail stores and sui generis uses, for example car showrooms.
- 15.4 The London Plan identifies the Great West Road as an Industrial Business Park. IBPs are for firms that need better quality industrial surroundings, including B1b, B1c and high value added B2 activities. Uses consistent with the function of an Industrial Business park are designated within the boundary of the IBP as identified on the Proposals Map.
- 15.5 The SIL framework establishes a hierarchy and it is considered important to retain industrial capacity in strategic locations including the Great West Road IBP. Any release should therefore be in other industrial estates, which will be managed through the implementation of locational policy EP8.
- 15.6 Significant net loss of industrial capacity is the net loss of floorspace, land (ha) and jobs, which would harm the integrity of a site for its industrial use. If there is a need for additional land to meet demand in the Borough for industrial/warehouse uses, any loss of jobs, floorspace and/ or site area will be considered significant.

EP8 Other Industrial Land (Outside Strategic and Locally Significant Industrial Sites)

A change of use from industrial, warehousing and related uses on a site not identified as a Preferred Industrial Location, Industrial Business Park or Local Significant Industrial Site (Refer to Annex 1 and Proposals Map) will be acceptable subject to the following criteria:

a. The existing use of the site for industrial/ warehousing uses is detrimental to the amenity of the surrounding area;

OR

b. evidence is provided of the active marketing of the site for industrial and warehousing uses for a period of at least one year;

the site does not contribute significantly to industrial supply and economic diversity, either individually or cumulatively; and

surrounding industrial sites are not undermined for industrial uses.

Housing, education and/or community uses will be considered as an alternative use in the first instance, provided the above criteria are met.

Implementation

- 16.1 To ensure consistency with the Mayor's guidance, the Council are setting less stringent criteria, relative to policies EP6 and EP7, for the release of industrial land outside strategic and locally significant industrial locations. Policy EP8 will therefore be implemented through planning decisions on applications for a loss of industrial/ warehousing/ land/ floorspace.

Monitoring

Indicator	Total land lost through the granting of planning permission from industrial/ warehousing uses on industrial sites outside SILs and LSISs relative to the Borough as a whole.
Target	Relative to the Borough as a whole, at least 95% of land lost from industrial/ warehousing uses shall be on industrial sites outside SILs and LSISs.
Data Source	London Development Database.

Justification

- 16.2 Outside Strategic and Locally Significant Industrial Sites, there are smaller industrial estates, and 'stand alone' employment uses which contribute to the Borough's industrial capacity. This policy seeks to retain in industrial use higher quality industrial sites and those of poorer quality that meet a demonstrable need for low cost accommodation. It moreover seeks to ensure that sites that are released to other uses are genuinely redundant for industrial use and where an alternative use is considered more suitable in planning terms.
- 16.3 For industrial sites outside designated employment locations, the Mayor suggests an approach to releasing land that is neither restrictive nor permissive, but instead takes account of local differences in supply and demand of industrial sites.
- 16.4 The review of supply and demand in the *Hounslow Employment Land Study 2004* suggested that Hounslow should be more towards the 'restrictive' end of the 'limited transfer' banding. In the Mayor's SPG on Industrial Capacity (2008) Hounslow is identified in a 'Restrictive Transfer' category. The guidance goes on to state "Boroughs within this category are encouraged to adopt a more restrictive approach to the transfer of industrial sites to other uses" (page 25).
- 16.5 The supply of industrial/warehousing land in West London is limited and there is the need to retain industrial capacity to accommodate existing and future demand. A strategic monitoring benchmark of 2.7 ha per annum has been set for the amount of industrial land that may be released between 2001 and 2016 (41 ha) in the West London Sub Regional Development Framework, May 2006. As summarised in paragraph 14.12, the GLA have since published *London Industrial Land Release Benchmarks* (April 2007), which provide the most up-to-date benchmarks on appropriate release and conclude that West London's benchmark for the period 2006 – 2026 is 52 ha.
- 16.6 The supply of industrial land and amount lost to non-industrial uses will need to be reviewed on a regular basis to ensure that the release of land is managed appropriately.
- 16.7 The *Hounslow Employment Land Study* (2004) identified an average of 11% vacant industrial and warehousing floorspace in the Borough, which indicates a satisfactory level of demand for space in the Borough. The corresponding analysis of supply showed the amount of vacant land represented just 5 years supply, indicating significant pressure on employment land in the Borough.
- 16.8 On the basis of these conclusions, the release of industrial use to alternative uses should form only a very small proportion of the overall supply of land. However, the supply of industrial land and amount released to non-industrial uses will need to be reviewed on a regular basis to ensure that the release of land is managed appropriately.

- 16.9 A change of use from industrial, warehousing and related uses will be considered against the criteria in the policy and the following:
- 16.10 An assessment of whether a use is detrimental to the amenity of the surrounding area should be considered in terms of impacts for example:
- impacts on highways and traffic;
 - noise, particularly at unsociable hours;
 - odour;
 - air pollution;
 - other nuisance.
- This may be reflected in complaints to the Council or neighbouring local authority; visible effects on neighbouring properties; observations; or other evidence.
- 16.11 The evidence of active marketing should include information on the history of marketing; agent(s) and media used (press articles and advertisements); interest in the site/premises (including reasons for prospective tenants not taking up space and how these problems have been addressed); evidence that the rental levels offered have been competitive including the offer of renewal of lease to existing tenants at a reasonable rate; and flexibility in space offered including disaggregation of space where applicable.
- 16.12 It is proposed that a checklist will be developed to appraise evidence of marketing and to ensure consistency in the approach taken. The Council must be satisfied that the evidence received is robust and the information is presented in a way that is clear to Members, officers and the public.
- 16.13 The contribution of the existing use to industrial supply and economic diversity is also a consideration. A site's contribution to the Borough's industrial supply and local economic diversity may lie in its ability to provide accommodation for various types of industrial uses e.g. lower-cost affordable industrial units for small businesses, start-up firms, lower-value industrial uses or other businesses important to the local economy.
- 16.14 In addition to a site's individual contribution to local economic diversity, the Council will consider the cumulative contribution the existing use makes to the local industrial supply and economic diversity in conjunction with other sites. The harm to industrial supply and local economic diversity will be considered significant where the loss of industrial land would reduce the quantity, quality and variety of industrial capacity in a part or the whole of the Borough to meet demand.
- 16.15 The Council acknowledges an overall decline in traditional industrial uses in London and associated pressures for redevelopment, particularly to address the housing shortage in London and the South-East of England. There is also a need to provide the social infrastructure with increases in population, including education and community facilities. This is recognised in the London Plan, which states "*surplus employment land should help meet strategic and local requirements for other uses such as education and community activities and, in particular, housing.*"

EP9 Small and Medium Sized Enterprise

The retention of small business units (units of less than 50 sq m) suitable for start-up and small/ medium sized enterprises (SMEs) will be sought.

Proposals for small business units will be considered favourably, subject to Policies EP1 and EP5.

The provision of small business units will be sought as a part of proposals for the redevelopment of an existing employment site in appropriate locations.

The provision of small business units will be sought in appropriate locations as a part of mixed-use schemes.

Implementation

- 17.1 Policy EP9, in encouraging the retention and new provision of small business units, will be implemented through planning decisions on applications for new development and a change of use.

Monitoring

Indicator	Number of small business units approved.
Target	Increase in the number of small business units approved.
Data Source	Council's internal database.

Justification

- 17.2 Small and medium sized enterprise (SME) plays an important role in Hounslow and contributes to diversity in the economy, with many small businesses owned by traditionally marginalised groups including women and ethnic minorities. Small and medium sized enterprise is defined in this context as any business of less than 199 employees and includes for example, the self-employed, those using their home for business purposes or occupying live/work units.
- 17.3 The business structure of the Borough shows that the overwhelming majority (99%) of workplaces are SMEs, of which 85% employ between 1 and 10 people (8,120 workplaces in 2005). Since 2003, there has been a 5% increase in the number of workplaces of between 1 – 10 employees (small businesses) or 392 workplaces. Whilst there has been a decrease of 37 (4%) in the number of workplaces between 11 – 199 employees (medium sized businesses) (Annual Business Inquiry 2005), the overall number of small and medium sized enterprises (1 – 199 employees) has increased by 4% due to the increase in workplaces of 1 – 10 employees (small businesses).

- 17.4 Despite the presence of large employers including some major international companies, SMEs are key to sustaining and enhancing business and employment growth in the Hounslow. This is because together SMEs employ a large number of people and also because of their importance for business innovation and growth in “new economy” industry sectors such as creative and media industries. Significant demand for industrial land in the west of the Borough and consequently high land prices in the Heathrow catchment area have driven smaller businesses to other areas. Pressure on land is compounded by fierce competition from residential uses, which are pushing out industrial and commercial activities.
- 17.5 The Council acknowledges that many small enterprises in the Borough suffer from inadequate and inappropriate accommodation and struggle to meet premises, labour, relocation and business expansion costs.
- 17.6 This policy seeks to protect and retain viable sites, which currently or can potentially accommodate small and affordable workspaces suitable for SMEs. This policy also seeks to encourage a greater provision of space for SMEs to support growth. To ensure sufficient provision, this policy also encourages the provision of affordable work units as part of mixed-use schemes.

EP10 Location of Visitor Accommodation and Conference Facilities

Proposals for visitor accommodation and conference facilities will be directed to town centres (Brentford, Chiswick, Feltham and Hounslow – refer to proposals map) in the first instance, followed by edge of centre locations.

Where net additional floorspace exceeding 200 sq m or 25% of the existing floorspace is proposed (whichever is the lower) in the redevelopment or extension of a building outside town centres, it will need to be demonstrated that there are no sites available in the town centres followed by edge of centre locations, there is a demonstrated need, and the site is accessible by sustainable modes of transport.

Implementation

- 18.1 The policy's aim is to ensure new development is appropriately located in accordance with national and regional guidance. Directing new visitor accommodation and conference facilities to town centres is key to their accessibility and the regeneration of the town centres. The Council will therefore ensure proposals are directed to town centres, the policy being implemented through planning decisions.

Monitoring

Indicator	Net additional hotel rooms completed in the Borough.
Target	2,000 net additional hotel rooms by 2026.
Data Source	London Development Database.

Indicator	Proportion of approved floorspace for visitor accommodation and conference facilities in town centres relative to the Borough as a whole.
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Target	Relative to the total floorspace approved for visitor accommodation and conference facilities in the Borough, at least 80% of approved floorspace for visitor accommodation and conference facilities shall be in town centres.
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Data Source	London Development Database.
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Justification

- 18.2 The London Plan benchmark target for the provision of new hotel bedrooms is 36,000 over the period 2001 to 2016, the equivalent of 2,400 rooms per annum across London. Improvements are also sought to the quality, variety and distribution of existing visitor accommodation and facilities available. The West London Sub-Regional Development Framework identifies 15% of

London's visitor accommodation to be in West London, with the stock having increased by 50% between 1991 and 2004 (5,600 rooms). At present it is estimated that West London will accommodate 5,200 extra rooms by 2016. The findings of the Mayor's Hotel Demand Study (2006) predict that the demand for visitor accommodation by 2026 will be higher. This will be driven by increases in both business and leisure tourists and Hounslow is identified as a key growth area with international access for passengers travelling through Heathrow airport. Heathrow is seen as a key driver of tourism for West London, both for overnight stays and increasingly as a business destination³. This predicted increase in demand for business meeting facilities could also lead to hotels with larger and more flexible conference/seminar rooms.

- 18.3 The estimated hotel stock in Hounslow in 2005 was 968 bedrooms (1% of total London-wide supply)⁴. The Hotel Demand Study (2006) estimates that between 2007 and 2026, 2,000 net additional hotel rooms will be required in the Borough.
- 18.4 In accordance with the sequential approach, the anticipated demand for additional hotel bedrooms should be accommodated within the Borough's town centres as the most sustainable locations. Hotels strengthen the wider role of town centres, providing a range of employment opportunities; contribute to urban vitality and regeneration; and allow visitors to easily access other town centre facilities such as retail, leisure, arts, cultural and tourism uses. Increasing tourism provision in town centres is also in accordance with the West London Tourism Strategy and Action Plan.
- 18.5 The net additional floorspace proposed outside the town centres will be limited to an increase in floorspace of 200 sq m or 25% whichever is the lower. To allow any more development than this in locations not as accessible by sustainable transport as town centres encourages car-use. This is consistent with the approach set out in government guidance and would otherwise cause harm to the environment and communities. Furthermore, employment growth outside the Borough's town centres could cause harm to the town centres as foci for employment. This is the basis for Planning Policy Statement 6 'Planning for Town Centres' stating "the sequential approach is only a relevant consideration in relation to extensions where the gross floor space of the proposed extension exceeds 200 square metres".
- 18.6 The significant cluster of hotels around Heathrow indicates the airport's importance to West London's visitor economy. This will be enhanced further with the increase in capacity following the opening of Terminal 5 in 2008⁵. The Borough recognises that the anticipated growth in passengers at Heathrow will create significant opportunities for new visitor accommodation. However, all proposals for hotels in locations near Heathrow, but outside the Borough's town centres, will be assessed in line with the sequential approach.

³ West London Tourism Strategy and Action Plan, March 2005

⁴ Hotel Demand Study, May 2006

⁵ West London Tourism Strategy and Action Plan, March 2005

Where the sequential test is satisfied in this regard, proposals in out of centre locations should also demonstrate good accessibility by a range of sustainable transport modes and need. It is the Council's aspiration that 100% of new hotel bedrooms are within town centres. Where this is not achieved, the outcomes and justification for hotels outside town centres will be set out in the Annual Monitoring Report.

Annex 1 – Employment Designations (also refer to Proposals Map)

Strategic Industrial Locations

Preferred Industrial Locations

North Feltham
Brentford

Industrial Business Park

Great West Road

Locally Significant Industrial Sites

Cargo Service centre
Ascot Road Industrial Estate
Ashford Industrial Estate
Challenge Road Industrial Estate
Bedfont North Industrial Park
Maple Industrial Estate
Feltham Corporate Centre
Plane Tree Crescent
Five Ways Business Centre
Felthambrook Industrial Estate
Hanworth Trading Estate
Popham Close
Feltham Marshalling Yards
Radius Park
Sun Life Trading Centre
Heathrow Causeway Estate
Haslemere Heathrow Industrial Estate
Heathrow International Trading Estate
Prologis Park
Parkway Trading Estate
Heston Industrial Estate
Heston Phoenix Business Park
Victory Way
The Heston Centre
Spitfire Estate
Airlinks Industrial Estate
Harlequin Centre
Serco
Bulls Bridge Industrial Estate
Worton Hall Industrial Estate
Victory Business Centre

Clock Tower Road Industrial Estate
Phoenix Trading Estate
Kew Bridge Distribution Centre
Power Road Industrial Estate
Bollo Lane Industrial Estate

Key Existing Office Locations

Brentford Town Centre
Chiswick Town Centre
Feltham Town Centre
Hounslow Town Centre
Chiswick Business Park
Bedfont Lakes Business Park
Great West Road (2 parts)

- Eastern extent
- Western extent

Preferred Office Locations

Brentford Town Centre
Chiswick Town Centre
Feltham Town Centre
Hounslow Town Centre
Chiswick Business Park

Annex 2 – List of UDP Policies Replaced

- Policy IMP.4.1 Primary Locations for Economic Development
- Policy IMP.4.2 The Great West Road
- Policy IMP.4.3 Bedfont Lakes
- Policy IMP.4.4 Chiswick Business Park

- Policy E.1.1 Location of New Employment Development
- Policy E.1.3 Location of General Industry (B2) and Storage and Distribution (B8) Uses
- Policy E.1.5 Development Involving Loss of or Changes in Employment Uses
- Policy E.2.2 Mixed Uses
- Policy E.2.3 Improvement of Employment Sites
- Policy E.2.4 Improvement of Employment Premises
- Policy E.3.1 Disabled Access
- Policy E.4.1 Local Residents
- Policy E.5.1 Visitor Accommodation
- Policy E.5.2 Conference and Exhibition Facilities
- Policy E.5.3 Visitor Attractions
- Policy E.5.4 Open Air Tourism Facilities and Short Stay Camping and Caravan Sites

Glossary

Creative Industries

“Those activities which have their origin in individual creativity, skill and talent, and which have their potential for wealth and job creation through the generation and exploitation of intellectual property. These have been taken to include the following key sectors: advertising, architecture, art and antiques, crafts, design, designer fashion, film, interactive leisure software, music, the performing arts, publishing, software and television and radio” (Department of Culture, Media and Sport).

Edge of centre location

For all town centre uses excluding retail, an edge of centre location is within 300 metres of a town centre boundary. For office development, locations outside the town centre but within 500 metres of a public transport interchange, including railway and bus stations and within an urban areas will be considered as edge-of-centre locations for purposes of the sequential approach.

Employment capacity

‘Employment capacity’ refers to the supply of employment and is defined in terms of land area, floorspace and/or job numbers, depending on the type of use.

Employment use

‘Employment uses’ include Class B uses and sui generis uses that provide employment and are consistent with the designation of a site.

High trip generating uses

Employment uses with a high employment density include offices, which based on the most recent research (London Office Policy Review 2006) have an average employment density of 1 job per 16.3 sq m. This is likely to increase in the future. Other uses may also attract a large number of visitors as well as employees and should therefore be located in sustainable locations in the first instance (town centres). This may include town centre uses as defined in Government guidance including hotels, and conference venues.

Industrial Business Park

Industrial Business Parks are a type of Strategic Industrial Location. IBPs are for firms that need better quality surroundings. These are usually B1 (b), B1 (c) and high value added B2 activities, require significantly less heavy goods access and are able to relate more harmoniously with neighbouring uses than those in PILs.

Industrial uses

Where referred to in the document and it is not defined, industrial uses includes B1b, B1c, B2 (as defined in the Circular 03/05: Changes Of Use Of Buildings And Land - The Town & Country Planning (Use Classes) Order

1987) and sui generis uses that have the characteristics of an industrial activity.

Key Existing Office Locations

Key Existing Office Locations are identified on the Proposals map and include Town Centres, Chiswick Business Park, the Great West Road and Bedfont Lakes.

Preferred Industrial Location

Preferred Industrial Locations are a type of Strategic Industrial Location. PILs are suitable for firms, which do not place a high premium on environmental quality. These usually fall within the B1 (c), B2 and B 8 Use Classes.

Preferred Office Location

Preferred Office Locations are identified on the Proposals map and include Town Centres and Chiswick Business Park.

Small and medium sized enterprises

A small business is defined as having 1 – 49 employees, and a medium business, 50 - 199 employees.

Strategic Industrial Locations (SIL)

Strategic Industrial Locations are identified in Annex 2 of the London Plan. There are two types of SIL, Preferred Industrial Locations and Industrial Business Parks.

Strategic and Locally Significant Locations for employment

Identified on the Proposals map. These include Preferred Industrial Locations, Industrial Business Parks, Locally Significant Industrial Sites and Key Existing Office Locations.

Town centres

The 4 town centres are from east to west Chiswick, Brentford Hounslow and Feltham, the boundaries of which are identified on the Proposals map.

Uses requiring heavy goods movements

B2 (general industrial uses) and B8 (storage and distribution including logistics) and other related uses, which necessitate the movement of large quantities of goods by road, rail and/or waterways.

Warehousing

Where referred to in the document and it is not defined, warehousing includes storage and distribution uses (B8 uses as defined in the Circular 03/05: Changes Of Use Of Buildings And Land - The Town & Country Planning (Use Classes) Order 1987).

Workplaces (National Statistics)

'Data (or local) units do not readily correspond to the commonly used terms firms, companies or businesses by which employers are sometimes identified. They are roughly equivalent to workplaces but because of the way the data

are collected two or more units can be present in the same workplace. For example, a bank may have several branches and offices in a city; each one of these would be counted as a separate data unit.

Note: There is a list of acronyms on page 3 of the Development Plan Document.

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