

Hearing Statement

Hounslow Local Plan Examination

Matter 2

Spatial Strategy and Strategic Policies

Prepared on behalf of Robert Wiseman & Sons Limited

December 2025

Hearing Statement, Matter 2

1 Introduction

- 1.1 This Statement has been prepared on behalf of Robert Wiseman & Sons Limited in respect of Hounslow Local Plan, which has been submitted to the Secretary of State for Examination.
- 1.2 This document seeks to make a series of representations on the Local Plan and the evidence base that underpins it; specifically, in response to the Inspectors Matters, Issues and Questions.
- 1.3 Robert Wiseman & Sons Limited are the owners of the existing employment site known as the 'Dairy Crest Site', which is no longer needed to meet their operational requirements and is therefore available for redevelopment. The entire site is previously developed land, and a planning application (ref. P/2025/2701) was submitted earlier this year and is currently awaiting determination. It is considered that this land holding can form an important part of the employment land supply in the Borough to support Economic Growth and supply of jobs and services over the Plan Period.
- 1.4 Responses are provided to the relevant questions that will form the basis of the Hearing Session regarding Matter 2 covering the policies related to Hounslow's Spatial Strategy and Strategic Policies, particularly in respect of draft Policy P2.

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Matter 2: Spatial Strategy and Strategic Policies

Questions

1) Does the Plan's vision and key objectives provide a positively prepared and justified approach for Hounslow's future growth?

Objective 2a of the draft Development Plan states the intention of the Council to do the following:

To encourage inward investment and facilitate job growth by maintaining the supply of employment land, allocating development sites to accommodate forecasted employment growth and supporting our existing employers to expand.

While this objective is supported, the correct steps to achieve economic growth have not been followed. The Council's Employment Background Explanatory Note (Oct 2025) states that there is an industrial requirement in the West of the Borough for 75,877 sqm of floorspace. If the Local Plan was prepared more positively, to meet Hounslow's needs, opportunities would have been realised to address this requirement, including through the full (3.8ha) allocation of the Dairy Crest site under Policy ED2, as opposed to only part of the site (1.6ha). In this instance, the allocation does not allow for the full capacity of the site to be developed for employment use.

2) Does the Plan as submitted appropriately identify "strategic policies" or are the Council's proposed modifications necessary for soundness?

For the Development Plan to be considered 'sound', it must be consistent with the National Planning Policy Framework, such as paragraph 124 of the NPPF, which states that planning policies 'should promote the effective use of land' including 'previously developed or brownfield land'.

Draft Policy P2, focusing on the West of the Borough, is accompanied by a map of this area, whereby Locally Significant Industrial Sites (LSIS) are identified, including the Dairy Crest site. However, the whole site is not indicated on the map, with this proposed allocation only relating to part of the site comprising a 1.6 ha parcel of land. If the Policy is to promote the effective use of brownfield sites, then to be sound the whole Dairy Crest site covering 3.8ha should be allocated as LSIS. Until this revision is made the Plan will not be sound as it will not be in accordance with the policies that prioritise development of brownfield sites as set out by the NPPF (such as paragraph 148) and the London Plan (such as policy GG2) or the objectives for economic growth that draft Policy P2 encourages.

3) Is the Plan consistent with the Framework which expects strategic policies to look ahead over a minimum 15-year period from adoption?

As noted, the Council's Employment Background Explanatory Note (Oct 2025) states that there is an industrial requirement in the West of the Borough for 75,877 sqm of floorspace. If the Council is to meet its economic objectives for a minimum 15-year period, greater flexibility is needed for more employment land to be allocated across this period.

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4) Is the spatial distribution of development across the Borough justified and what factors influenced the Spatial Strategy, for example, the approaches of the existing London Plan, physical and environmental constraints, effects on the highway network, the capacity of infrastructure to accommodate the proposed amount development?

In preparing the draft Plan, the Council has not followed the requirements of the NPPF or the London Plan NPPF (2025) as greater use can be made of existing previously developed land to help meet the identified needs of the draft Plan. This is primarily in respect of their failure to allocate the entirety of the Dairy Crest Site as LSIS.

5) What alternative options for the spatial strategy were considered?

No comment.

6) Why was the approach of the submitted Plan chosen and is it an appropriate strategy having regard to reasonable alternatives?

No comment.

7) Are the Plan's strategic policies sufficiently clear about the overall amount of new housing and employment development envisaged in each of Hounslow's ten districts as identified in the Plan?

No comment.

8) Is the Plan sufficiently clear in terms of the approach to designated neighbourhood areas in Hounslow (Butts Farm, Hounslow Town Centre and Osterley) and is it positively prepared, justified and consistent with national policy if the strategic policies do not set out a housing requirement for those designated neighbourhood areas?

No comment.

9) Did the methodology applied to site selection and the focus for growth in the spatial strategy take full account of flood risk and apply a sequential, risk-based approach to the location of development?

No comment.

10) Is there sufficient evidence to support the Plan approach that there are no reasonably available sites in areas at lowest risk of flooding so as to justify the allocation of sites in areas known to be at higher risk either now or in the future from any form of flooding (i.e. those identified in Flood Zones 2 and 3)?

No comment.

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11) Has the cumulative impact of all allocated sites, and sites within other policies in the Plan, on the highway network and other infrastructure such as telecommunications, security, waste management, water supply and wastewater, and facilities for education and health, been taken into account in the Plan? What evidence demonstrates this and what mitigation will be put in place to ensure that any adverse impacts are minimised?

No comment.

12) Is there evidence that the electricity network in Hounslow/West London has the capacity to accommodate the residential and economic growth proposed in the Borough by 2041? To what extent should such matters be considered a potential constraint to delivery of the objectives of the Plan given the statutory duties on electricity distributors in the Electricity Act 1989 (as amended)?

No comment.

13) Are the boundaries and scope of the Great West Corridor Opportunity Area (OA) and Heathrow OA as identified in the Plan consistent with the London Plan 2021?

No comment.

14) Table 2.1 of the London Plan 2021 provides indicative figures for the Great West Corridor OA of 7,500 new homes (based on 2017 SHLAA capacity identified for 2019-2041) and 14,000 new jobs (up to 2041, based on the London Employment Site Database for 2016- 2041). Policy SC1 of the Plan seemingly takes forward the new homes figure. However, given the omission of a specific jobs target in the Plan for the Great West Corridor OA, what is the justification for the approach to economic growth in that location?

No comment.

15) Policies P1, P1(a), P1(b) and P1(c) provide specific approaches to guide development proposals in the Great West Corridor; is it positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan 2021. Responses should specifically address:

- a) Whether the boundary of the Great West Corridor area and the subdivision into Great West Corridor West, Central and East; justified and in general conformity with the London Plan?**
- b) Whether the policies should be made clear that the support in principle for certain uses is subject to development proposals compliance with other relevant policies of the Plan and the London Plan?**

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- c) Is the support in principle for retail and commercial uses, particularly in the River Brent Quarter, consistent with the sequential test applied to main town centre uses in national policy or otherwise justified?
- d) Whether the approach to and location of the proposed new Green Innovation and Enterprise Hub is sufficiently clear in the Plan to be justified and effective?
- e) If the suggested approach to phasing of development alongside improvements to the transport network is justified and sufficiently clear how this would be achieved?
- f) Is the requirement that development proposals contribute to improvements to public transport provision and that social infrastructure be delivered alongside development, justified and if so, is it sufficiently clear how contributions from development proposals would be calculated?
- g) Is the purpose of the Creative Enterprise Zone sufficiently reflected in the policy?
- h) Are the other specific requirements of development proposals, sufficiently clear to be evident how a decision maker should react to development proposals?

No comment

16) Table 2.1 of the London Plan 2021 provides an indicative figure for the Heathrow OA of 13,000 homes (based on 2017 SHLAA capacity identified for 2019-2041). Policies SC1 and P2 of the Plan identify a contribution of at least 6,500 new homes in Hounslow up to 2041. What methodology was used to determine the apportionment of new homes to be provided in Hounslow given that the Heathrow OA extends beyond the Borough boundary?

No comment.

17) Table 2.1 of the London Plan 2021 suggests that the indicative figure for the Heathrow OA is 11,000 jobs (up to 2041, based on the London Employment Site Database for 2016-2041). Policy P2 of the Plan goes on to address the need for economic growth in the West of the Borough in that context, including selective and limited releases of Green Belt to help meet the need for new industrial floorspace. What is the justification for that approach, given the omission of a specific jobs target to confirm the apportionment of the employment growth identified for the Heathrow OA in the London Plan 2021?

The Heathrow OA is considered to be an area that can support considerable economic growth, and there is sustained demand for employment floorspace in this area. A minimum jobs target could be provided to help assess how the area will develop in comparison to the target set out in the London Plan. If a jobs target is provided then this should be a minimum figure to ensure that development that supports economic growth is not artificially constrained in this area.

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18) Would the overall approach to the Heathrow OA in the Plan and to Heathrow Airport specifically in Policy EC3, align with the potential spatial implications of the Airports National Policy Statement, landowner intentions and Policy T8 of the London Plan 2021? If not, why not?

No comment

19) Has the approach to the Heathrow OA been shaped by effective and on-going joint working between the Borough, the Greater London Authority, the London Borough of Hillingdon, Heathrow Airport Limited and other relevant bodies?

No comment.

20) Is Policy P2, positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan 2021 insofar as it seeks to provide the overarching approach to guide development in the West of the Borough area as located in the Heathrow OA. Responses should specifically address:

- a) Whether the boundary of the West of Borough area is justified and in general conformity with the London Plan?**
- b) Whether the other specific requirements of development proposals are sufficiently clear to be evident how a decision maker should react to development proposals?**

In respect of the specific requirements of development proposals, the points noted under items L and M should reflect the need to respond to market and occupier needs and their operational requirements. Putting a blanket requirement to provide small business units is not reasonable, particularly if there is weak demand for such space or it will mean that other development typologies for which there are higher levels of demand cannot be provided for. No justification for this approach is set out in the Plan and it should therefore be amended to remove the re-provision of small units as an absolute requirement to ensure that market requirements can be met to support economic growth.

21) Policy P2(a) relates specifically to the Cranford and Heston Neighbourhoods within the West of Borough Area. Are the specific requirements of development proposals in those locations justified, effective, consistent with national policy and in general conformity with the London Plan 2021?

No comment.

22) Policy P2(b) relates specifically to the Feltham within the West of Borough Area. Are the specific requirements of development proposals in those locations justified, effective, consistent with national policy and in general conformity with the London Plan 2021?

No comment.

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23) Are the proposed spatial approaches relating to Bedfont, Brentford, Chiswick, Hanworth Hounslow, Hounslow West, Isleworth and Osterley and Spring Grove, positively prepared, justified, consistent with national policy and in general conformity with the London Plan? If so, for effectiveness, should they be policies in the Plan?

No comment.