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By Email Only

Dear Inspectors,

Hounslow Local Plan 2020 - 2041 Matter 4 – Employment, Retail and Other Main Town Centre Uses – including proposed releases of Green Belt / Metropolitan Open Land

CBRE Ltd is instructed on behalf of Arianda Property Holdings Ltd (hereafter 'Arianda') in respect of their land at Rectory Farm, Cranford Lane. The Site is subject to a minerals allocation, however is located with the Green Belt and has been proposed by Arianda to be removed from the Green Belt to facilitate the designation of a Locally Significant Industrial Site for industrial and logistics development, following minerals extraction. This statement solely relates to the strategic matters set out in Issue 1 of Matter 4, in relation to Employment and Green Belt.

Issue 1, Q2:

Is the overall amount of employment land identified as to be provided in the Plan for industrial floorspace and office floorspace, justified? Why does the Plan not include a specific overall employment requirement in a strategic policy for industrial and/or office floorspace or a jobs target?

No, the overall quantum of employment land identified for industrial floorspace is not justified.

Document EX9 provides more recent data on the residual requirement for industrial floorspace across the borough, with 206,357sqm identified for the west of the borough. Arianda do agree that exceptional circumstances exist to justify the release of land from the Green Belt to reduce the residual floorspace deficit, however there remains a **substantial** need of 75,877sqm across the plan period.

EX9 provides an updated industrial balance calculation (Table 6.2). However, concerns remain regarding the scale of floorspace attributed to the 'potential intensification of underutilised sites,' which accounts for approximately 95,000 sqm of supply. Paragraph 6.54 of EBED1 confirms that none of these sites have been actively promoted, despite being identified over eight years ago. In the absence of robust qualitative evidence demonstrating the deliverability of substantial additional floorspace, there is no sound justification for including such a high quantum within the balance.

The projected shortfall in supply throughout the plan period fails to provide resilience or flexibility, particularly in light of paragraph 86 of the National Planning Policy Framework (NPPF, 2023), which requires economic policies to be positive, proactive, and adaptable to meet unforeseen needs. Although not addressed in the draft Local Plan, the Government signaled a clear direction of travel in January 2025

regarding their support for Heathrow Airport's expansion to include a third runway, an infrastructure change that could be pivotal for the UK's logistics network. Given the significant remaining shortfall in industrial and logistics floorspace, the draft plan falls short of providing the necessary flexibility.

Additional sites should be assessed for industrial and logistics use to meet the needs of the borough and wider Heathrow Opportunity Area.

Issue 1, Q8:

How has the employment land evidence assessed the need for additional sites for logistics development? Is the evidence sufficiently up to date? Is the Plan positively prepared in regard to logistics and in particular, any requirements arising from the Heathrow OA in the London Plan 2021?

No, the plan is not positively prepared in regard to logistics given the remaining deficit in supply across the plan period.

EBED1 does recognise the importance of supply and demand linked to Heathrow related logistics flows in the west of the borough, identifying that additional allocations beyond existing brownfield sites would be required. However, in recognising there is a shortfall it is unclear how S3 (Integrated Impact Assessment) (IIA) has fully taken account in the employment growth options the requirements of the logistics sector.

Paragraph 87 of the NPPF states:

"Planning policies and decision should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations."

The inclusion of the paragraph within the NPPF is specifically addressing the point that some sectors may have different locational requirements compared to others. In the case of logistics, this is often clearly the proximity to critical transport hubs such as airports or a strategic road network.

The PPG further expands upon this in stating:

*"The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, **and has distinct locational requirements that need to be considered in formulating planning policies** (separately from those relating to general industrial land.)"*

S3 acknowledges Heathrow's role in employment growth, however growth option E1 scored negatively on criteria such as Equalities, Communities and Wellbeing and Housing as it was determined the bringing forward employment development would undermine housing delivery. Given the specific locational requirements of logistics and sector specific needs, we question whether the Plan has fully addressed these nuances to ensure it is positively prepared.

Further review of potential additional sites to meet the logistics needs of the borough should be undertaken.

Issue 1, Q12:

Is Policy ED1, effective, justified, consistent with national policy and in general conformity with the London Plan 2021 with respect to the requirements for affordable workspace and the list of

development types and locations from which it will be sought? Responses should specifically address:

- a) Whether there is sufficient evidence of the amount of affordable workspace that would be provided and whether it is viable in the locations identified?**
- b) Is the approach to payments in lieu for offsite affordable workspace and how it would be calculated justified and effective?**
- c) How eligibility and nominations for affordable workspace would be considered and secured?**
- d) How existing affordable workspace would be retained in the Borough and whether the approach to re-provision is justified and effective?**
- e) Whether the intention to defer some of the detail of the approach to a Supplementary Planning Document, including how contributions will be used, is justified and consistent with national policy?**

A modification is proposed within S11 to part H of draft Policy ED1 (modification code HLP_C4_01) which would require Grey Belt sites to provide a quantum of affordable workspace for new employment development.

The inclusion of Grey Belt sites is not justified or effective in accordance with paragraph 35 of the NPPF. A Grey Belt assessment has not been undertaken to inform the plan (noting the Plan is submitted under transitional arrangements), and there is no viability evidence which would provide robust conclusions that affordable workspace is viable on potential Grey Belt schemes.

EBV1 was undertaken in June 2024 and does not include any reference to Grey Belt and therefore the proposed modification should not be incorporated into the Plan.

Policy ED1, part H does not account for site specific circumstances associated with industrial and logistics development where affordable workspace can be challenging. As stated in the new London Plan's consultation (it is noted the Plan is examined in the context of the 2021 London Plan), affordable workspace "can be challenging to deliver as part of industrial intensification and can constrain the large and often specialised layouts needed for some industrial uses". Policy E3 of the London Plan states:

"Boroughs, in their Development Plans, should consider detailed affordable workspace policies in light of local evidence of need and viability (CBRE emphasis). These may include policies on site-specific locations or defining areas of need for certain kinds of affordable workspace."

EBV1 applies generically to commercial uses, however there is not sufficient local evidence to substantiate industrial and logistics provision of affordable workspace, specifically in the west of the borough.

Issue 1, Q19:

The Council's Green Belt Background Paper – incorporating Exceptional Circumstances Assessment June 2025 (EBGB1) indicates that the proposed releases of Green belt (and MOL) in the Plan would only help to close the gap between the demand and supply of industrial land in both quantitative and qualitative terms. However, a considerable shortfall of both industrial and office floorspace over the Plan period would seemingly remain. In that context, to what extent does the evidence justify the proposed alterations to the Green Belt (and MOL) boundaries in the Plan (and those areas otherwise not proposed to be released).

(Full question not reproduced)

As outlined in the response to Question 8, Arianda agree that exceptional circumstances exist to justify meeting substantial industrial needs over the plan period. However, the conclusions in EBGB1 do not fully reflect the analysis presented in the supporting Green Belt reviews (EBGB4/EBGB5), particularly in

relation to footnote 7 of the NPPF, the assessment of site release against the five purposes of the Green Belt as a whole, and the long-term permanence of Green Belt boundaries. For example, the ARUP Green Belt Reviews identify select sub-parcels which perform weakly against specific Green Belt purposes, yet EBGB1 provides no commentary on these findings and how this has been taken into consideration in the Council's assessment.

For sites not proposed for release by the Council, it is considered a consolidated and comprehensive analysis is required to robustly determine whether further Green Belt release can be brought forward to reduce the shortfall in industrial and logistics floorspace. This is particularly relevant where several sites have been recommended for release in isolation from the wider Green Belt parcel, and would ensure amendments to the boundaries were fully justified in accordance with paragraph 145 of the NPPF.

I would be grateful if you could please confirm safe receipt of these representations and please do not hesitate to contact me should you wish to discuss any of the above.

Kelly Lippett – Director

CBRE on behalf of Arianda Property Holdings Ltd