

**Additional comments from Clare Searle, Chair, Friends of Hatton Fields (hereafter FOHF) – all comments refer to the plan for site 57 Hatton Fields**

**Matter 1: Habitats Assessment Regulation, questions 4 (method) and 5 (impacts)**

FOHF is not legally qualified to determine the legal compliance with the regulations. However we have concerns regarding the method of assessing the habitat of Hatton Fields and also considering the impact.

Although the Council has carried out the Habitat assessment, as provided in our **appendix 4** in our Regulation 19 response, we have commissioned an independent habitat assessment that goes into much more detail, breaking down the ecological value **per field** across Hatton Fields. Specific commentary from Salix highlights the habitat value of the precise fields that Hounslow Council is proposing to develop. It is FOHF position that the entire site should be classified as a SINC, not just the southern end of the fields. It is FOHF position that the habitat assessment carried out by Salix Ecology should take precedence over other assessments of Hatton Fields since it is more specific and the methodology of an ecologist spending a full week on site would strengthen this position. The conclusions made by Salix Ecology regarding the value of the habitat across the entire site and specifically the fields under threat of development are clear and reiterated in our Regulation 19 response form. **This report was shared with the Council as part of the Regulations 19 response, and it appears that there is no acknowledgement of the significance of the findings in this report.**

The Salix report looked only at flora and fauna. Our **appendix 6** provides a wildlife register for Hatton Fields that includes **animal life** as well. We also have recorded species of both flora/fauna and animal life in **appendix 5**, iNaturalist project which feeds GIGL data. Notable species include 5 species of **bat** with high likelihood of roosts near Flight Stables; a huge variety of **butterflies, dragonflies** and **moths**; large flocks of **starling** and **house sparrow**; **kingfisher**; birds of prey including **owls, buzzards** and **peregrine falcon**; variety of native UK **songbirds** ( tits, robins, dunnock, white throat etc); **woodpeckers** (including green woodpecker which prefer acid grassland due to presence of ants) and a dedicated area of undergrowth for **hedgehogs** near Flight Stables (FOHF has invested in providing food and shelter for this important animal). This is a rich habitat for our wildlife and considering the UK is depleted in wildlife and nature, this entire site should be a designated protected habitat.

**Matter 1 : Climate change, question 15,**

**Matter 2: Flood risk, question 9, and**

**Matter 7: questions 6 (flood); question 7 (air quality) and question 8 (noise and light pollution)**

FOHF is not legally qualified to determine the legal compliance with the Planning and Compulsory Purchase Act however we question if the Local plan is designed to secure that the development and use of the land on Hatton Fields as planned contributes to the mitigation of and adaptation to climate change.

Hatton Fields (in its existing form) contributes to climate change mitigation in the following ways:

- **absorbs heat**, mitigating heat island effects in this area, especially next to Heathrow.
- **absorbs huge volumes of rainwater** which runs off into the Duke of Northumberland River (site of Metropolitan interest). If this turns into contaminated water from an industrial estate (occupancy unknown but at least there is a high likelihood of HGVs on site) this could have devastating effects on our waterway. It is unclear if an assessment has taken place to measure any impact on the role of the Duke of Northumberland River, its potential increase in flood risk and what impact that has on local residents that back onto the river. We are concerned that flood risk will increase as well as a risk of increasing surface water problems (images below)



- **acts as a carbon green lung** for the entire area.

- helps the area with **reduced air pollution**. FOHF do not see any serious consideration of the impact of HGV Vehicles servicing increased warehousing, likely to be 24 hours in operation next to 2 major schools, a popular urban farm and close to residential properties with gardens. Already the area is impacted by air pollution from the airport. The plan for site 57 will cause a deterioration both during construction and in its final form for the local residents. This does not seem to be acknowledged by the Council.

- provides a **source for quiet exercise and contemplation** as well as a **walkway/short-cut off-road** for Bedfont residents from the village to Tesco Dukes green, **reducing car-use** in the area. It also provides a **dark-spot** in the area where nocturnal wildlife can live and thrive including bats. Of course this dark-spot also benefits residents of homes that back onto the largely unlit fields. FOHF do not see any serious consideration of the impact of increased lighting needed for the planned warehousing intensification on site 57 for residents and the impact on our nocturnal wildlife, including 5 species of UK bats. This is also a serious concern in relation to both the construction phase and in its final form. Despite the flight path, Hatton Fields currently offers the community a quiet rural space for recreational use and reflection. This will all be lost due to the site 57 plan. It is a good thing that the scale of proposed development is reduced in the current version of the plan, however the development will still have an impact on the entire site and these features of this valued Local green space.

**In summary, assuming the plan is for a 24/7 industrial estate to be in operation, this will increase localised heat effects as well as the air (incl carbon), noise and light pollution in the area. With expected increased volumes of rainfall, we expect the existing local challenges of surface water on our roads to become more of a problem (image below). These positive attributes of Hatton Fields and the risk to increasing climate risk in the area including air pollution for the local children appears not to have been properly considered in its gravity by the Local Plan and the Council.**

#### **Matter 1: Duties to Cooperate (questions 19&21)**

Aside from what seems to be missing – evidence of cooperation with **Heathrow airport itself** – the statement of common ground with **Hillingdon** showed that **Hillingdon Council support FOHF** on the matter of removing the Council's plan to develop Hatton Fields. Not only does Hillingdon Council recognise the value of Hatton Fields as contributing and valuable greenbelt but they state that in their view **Hounslow's Local Plan is not sound without its full removal. FOHF agree with Hillingdon Council on this point.**

**Matter 1: General conformity with the London Plan 2021 (question 22) and**

**Matter 2 : Reasonable alternative sites, question 10 and Consistency with the London Plan 2021, questions 13, 20a, 21, 22 and 23**

The London Plan stresses the importance of brownfield-first. In our regulation 19 objection our **appendix 1 set out industrial sites to let or for sale**. With our apologies, we have discovered that the conversion from square feet to square metres was incorrect. The square feet in that appendix is correct. However the square metres should be corrected as follows:

**March 2023** – total of **368,000 square metres** of unit space available to let or for sale

**September 2024** – total of **523,000 square metres** of unit space available to let or for sale

**October 2025** - total of **618,000 square metres** of unit space available to let or for sale

Our original appendix 1 did not include October 2025. This is refreshed data which I have not shared in full in line with the Inspectors Guidelines. With or without this new data, ***this shows a trend of increasing amounts of industrial space available within 5 miles of Heathrow airport.***

It is our understanding that the council is looking to create circa 255,000 sq metres of additional industrial use despite this growing amount of available in the existing portfolio.

The data shows that there are multiple sites within a 5-mile radius of Heathrow that is consistently to let / for sale across the timeframe of our research. For example –

<b>Site</b>	<b>Availability</b>	<b>Size</b>
Kempton Park Racecourse	In 2023 and 2025	40,467 square metres
Dolphin Estate	In 2023, 2024 and 2025	17,558 square metres
North Feltham Industrial Estate (across the road from Site 57)	In 2023, 2024 and 2025 (various units)	29,000 square metres advertised as available in 2025, total site could be regenerated, area per Google Earth = 416,000 metres squared.
Vector Park, Feltham	In 2023, 2024 and 2025	11,500 available in 2025
Radius Park (on Hatton Fields itself)	In 2023 and 2024	6,300 square metres
Heathrow Industrial Estate (up the a312 from site 57)	In 2023, 2024 and 2025	Small scale availability however the total area of the estate is 52,000 metres squared and arguably needs regeneration
Prologis Park, Uxbridge	In 2023, 2024 and 2025	18,000 square metres advertised 2025
McArdle Way, Colnbrook	In 2023 and 2025	12,800 square metres advertised 2025
Land at Queen Mother Reservoir, Horton Road, Colnbrook	2025	44,000 square metres

While some of the sites are not in the Borough of Hounslow, it is very easy for residents to travel across borough borders into Spelthorne (Surrey) and Hillingdon with well-connected bus and train routes.

We draw your attention again to appendix 2 Regeneration ideas where we lay out the vast amount of **open car parks within Heathrow airport itself**. With the help of Google Earth, we have identified over **600,000 metres squared** of car parks that could and should be repurposed. We should be forcing Heathrow airport to make the entire area less carbon producing with too many cars in and around this entire area. If it is true that more logistics space is needed to service the airport then what better way than reduce car use, and build on these brownfield sites within Heathrow's perimeter? Then Heathrow could potentially start investing in cycle paths, cycle storage and walkways. Right now, it is not possible to cycle or walk safely to Heathrow Terminal 4 from Bedfont village without going a huge distance to try and track pavements.

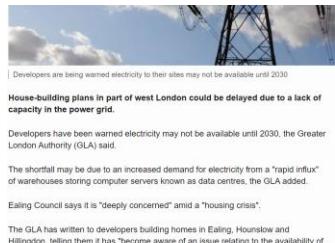
Finally – since publishing the plan there have been large-scale new industrial units (Air Park) developed on the A30 and an open consultation for further development on Bedfont Road. The Council should review what is already planned without the need to destroy Hatton Fields. Their data is now out of date. They should also ensure planned warehousing such as Rectory Farm should be delivered – extraction followed by underground warehousing and a

public park sounds much more positive than allowing developers to start scaling back on promises now wanting to only use the land for an ongoing open extraction mine.

**With all this said – FOHF do not consider the Local Plan's proposal for site 57 to be in conformity with the London Plan's principles of protection of green belt, the brownfield-first principle and the need for extenuating circumstances for developing this highly valuable green belt. Developers should regenerate before they dig into green belt land. It seems the Council relies on a brownfield register for the borough with no clarity on how reliable this data is. Our data is taken directly from Novaloca public information and it represents an 18 month period allowing reliability in terms of trending.**

## **Matter 2 : Electricity capacity, question 12**

It is our understanding that in 2023 public information was published stating that the electricity capacity in the area reached capacity:



While we can find no further updates from this time, reference is made by the GLA at that time that this might not change until 2030.

## **Matter 2 : Job creation / development of industrial floor space / Release of greenbelt, question 17**

FOHF has included in our regulation 19 response several questions and areas of doubt around why Hounslow Council seems to consider the release of green belt as justification for job creation. While some documentation in the library suggests that there is potential to create jobs by increasing warehouses, our **appendix 3** questions this assumption and demonstrates that the logistics industry is one of the fastest automating industries. We also do not consider this a positive strategy for job creation – job creation for our young generations in the medium to long-term should be moving away from the west of borough's dependence on low skilled, low pay jobs; if indeed there are that many jobs to create from this industry.

## **Matter 4: Issue 1, questions 17-19**

Without repeating comments already made within this submission relating to similar Matters as commented on above to answer other questions in the Inspectors' MIQs, FOHF do not consider the plan to release site 57 green belt as justified or in line with the purpose and protection of green belt land. Our response form and appendices all point to this conclusion. In summary:

**- exceptional circumstances are not considered valid** : based on the consistently available large volumes of industrial units to let or for sale frequently on sites that are accessible to our communities and which are truly in need of regeneration (North Feltham Industrial Estate in particular) there are brownfield options that should first be considered. Refer to appendix 1 and 2 and my comments of correction of our submitted data and conversion into metric measurements. Turning an old ugly industrial estate into a modern estate with modern units that are fit for purpose, opening up access to the River Crane for employees and the North Feltham community is a better option.

**- protecting urban sprawl and protecting unique characteristics of Bedfont is important for Bedfont village.**

This village is one of the last standing rural look and feel villages on the outskirts of the Borough. The Local Plan threatens to link Heathrow airport to Radius Park to North Feltham Industrial Estate and with other site allocations all across to Green Lane. The domination of industrial use sites is already by stealth starting to threaten this beautiful domesday book village, our community does not want to lose this sense of space created between

residential village life and busy airport activity. Images to help visualise Bedfont Village, more images of site 57 can be found on [www.friendsofhattonfields.co.uk](http://www.friendsofhattonfields.co.uk)



- North Feltham Industrial Estate and other estates identified in appendix 1 as consistently available are in several cases **not-optimised**. North Feltham Industrial Estate has several small single storey old units, several of these are in close proximity which could be optimised if regenerated. This is just one estate across the borough and in neighbouring boroughs. This is without even considering why the Council has not worked with Heathrow airport to explore opportunities to repurpose open car parks within the perimeter itself. This casts significant doubt on the thoroughness of the Council's efforts to go brownfield-first.

#### **Matter 7: questions 1 and 3**

Hatton Fields is part of a large site offering a mixture of horse grazing, wild grassland with grass walkways for dog walkers and local runners, a gritted pathway along the south for Bedfont community to walk off-road from the village to Tesco Dukes Green or Urban farm and managed football pitches. There are old farm ditches between fields and broken hedgerows with established and dense areas of native trees much of which is fruit producing. There are also large patches of blackberry bramble which communities forage. Dukes Green woodland is situated to the East and linked by the gritted pathways installed by Hounslow Council. To the west is Hatton allotments, a large allotment site which is actively supporting the local community to grow food. This was once agricultural land. In its existing form, the entire site offers a good mix of use and habitat. As mentioned under comments related to Matter 1 Habitats Assessment, we have submitted our appendices 4 (Salix ecology report), 5 (iNaturalist register of recorded wildlife) and 6 (wildlife register from [www.friendsofhattonfields.co.uk](http://www.friendsofhattonfields.co.uk)).

**Question 1 e)** building even on part of this land would destroy this mixed-use balance and its open character changing Hatton Field's skyline forever.

**Question 1 f)** the Local plan for site 57 would deteriorate and not enhance the provision of publicly available Local Space. While Bedfont village has access to Bedfont Lakes country park, this is not walkable for many residents on the Eastern end of the village bordering North Feltham. Right now, this is the only Local Space for residents in East Bedfont that is walkable and offering off-road running and walking routes.

**Question 3 a), b), c).** Hatton Fields site 57 could serve as an integral linking green habitat to link green corridors across the West of the borough. This is best illustrated using the image below. FOHF has been collaborating with other local groups on a visualisation to connect green spaces from the M4 Cranford Country Park to Hanwork Park,

Feltham. Our local communities would love to see these areas linked together with green-ways along connecting pavements allowing local residents to easily navigate between valuable green spaces.



This is the kind of ambitious visualisation that we would expect the Council's Local plan to include. Especially when this area is under threat from Heathrow airport expansion where opportunities could present themselves to use Hatton Fields as a location for BNG credits, not biodiversity loss.

Further comments around the contradictions against other nature and wildlife policies and plans are set out in our regulation 19 response form.

### **Friends of Hatton Fields Conclusion**

To make the Hounslow Council Local Plan sound, Friends of Hatton Fields propose that site 57 plans be removed from the plan in totality. The negative impacts of the loss of this site to warehousing to wildlife and our communities and to the borough as a whole far outweigh the positives of keeping, protecting and enhancing this habitat with the potential to restore an important area of London acid grassland once part of the historic heath.