

Hearing Statement

Hounslow Local Plan Examination

Matter 4

Employment, Retail and Other Main Town Centre Uses - including proposed releases of Green Belt / Metropolitan Open Land (Issues 1 and 2)

Prepared on behalf of Robert Wiseman & Sons Limited

December 2025

Hearing Statement, Matter 4

1 Introduction

- 1.1 This Statement has been prepared on behalf of Robert Wiseman & Sons Limited in respect of the draft 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 the 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 4 covering the policies related to Economic Development and the Green Belt, particularly in respect of draft policies ED1, ED2 and GB1.

Hearing Statement, Matter 4

2 Matter 8 Employment/Town Centre/Culture Policies**Issue 1 (Policies ED1, ED2 & GB1)****Questions****1) What is the evidence in relation to jobs growth and the need for employment land/floorspace in the Borough over the Plan period? Is the employment land evidence base sufficiently up to date taking account of market signals?**

The figures presented by the Council's Employment Background Explanatory Note (Oct 2025) stop at 2023 and are therefore not up-to-date. While the Note shows some dip in industrial job growth after 2022, there is no evidence to show how figures have changed in the last two years after further Covid-19 recovery and a change of Government, including their revisions to the National Planning Policy Framework. The note also reports that the Office for National Statistics have stated that these dips could be because of potential data errors.

Without up-to-date job figures, we support the Council's conclusions from the Note that bringing forward site allocations and allowing for future flexibility, should be the objective for the delivery of employment development in the Borough. This is consistent with the objectives of paragraph 86 of the NPPF, particularly part e, that requires policies to be flexible and responsive to economic needs, that may change over time.

Levels of demand for employment land remain high, especially for good quality sites that are well connected and have good access to the strategic highway network such as the Dairy Crest Site. Such sites continue to generate high levels of interest from the market identifying that there is continued demand for good quality employment sites in Hounslow to support the approach taken in the draft Local Plan.

2) 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?

As noted above, given the high levels of demand experienced for good quality employment land, the amount of employment land proposed in the draft Plan is supported. The Council should, however, review opportunities to allocate more land for development, as only part of the Dairy Crest Site is allocated for redevelopment under Draft Policy ED2, even though this is previously developed.

A floorspace figure could be included in the draft Plan which would help to compare against the employment targets for Opportunity Areas set out by Table 2.1 of the London Plan. However, as flexibility is needed to accommodate a range of occupier requirements across different land uses (E(g)(iii), B2 and B8), the floorspace target is perhaps more relevant as this can be more easily quantified.

If an employment target is referred to under policy, then this should be a minimum target to allow for flexibility. As there has been a loss of employment land over previous years and sustained levels of demand within Greater London, then this should not be described as an upper limit as this could potentially constrain economic growth.

Hearing Statement, Matter 4

3) How does the overall amount of employment land identified to be provided in the Plan for industrial floorspace and office floorspace, relate to the jobs growth intended in the Heathrow OA and the Great West Corridor OA respectively in the London Plan 2021?

There is continued demand for industrial floorspace in the West of the Borough and the Heathrow Opportunity Area. As noted above, industrial land can accommodate different uses, employment densities and configurations so a range of jobs growth may be needed to identify different scenarios.

4) Is the Plan sufficiently clear as to the amounts and location of general industrial floorspace (and those otherwise falling within Classes B1(b), B1(c) and B8) that it intends to allocate or identify?

No, the Plan needs to be made clearer. Specifically, Policy ED 1 lists sites to be released from the Green Belt and Policy ED 2 lists new Locally Significant Industrial Sites (LSIS). As noted above, the Dairy Crest Site comprises previously developed land, however only part of it is proposed to be allocated as LSIS.

The entire site should be allocated for development, as it is an existing employment site and as previously developed land, its development for continued employment use can support sustainable patterns of development. The site capacity can therefore be increased from that currently considered in the draft Plan. It is noted that no floorspace targets are stated, and this could be added for the site, to demonstrate how it can help to address the deficit of 75,877 sq m of industrial floorspace that the Council have identified in their Evidence Base.

The Council's current approach to considering locations for employment development is not in accordance with paragraph 148 of the NPPF, or Policy SD1 of the London Plan.

5) The approach of directing new offices to the Borough's four town centres, key office locations and sites allocated in the Plan is noted. Is such an approach justified and consistent with national policy?

No comment.

6) Should Policy ED1 (or other policies of the Plan) make clear how office floorspace in Class E would be secured for the purposes intended?

No comment.

7) Are the other requirements of development proposals for offices in Policy ED1, sufficiently clear to be evident how a decision maker should react?

No comment.

8) 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

Hearing Statement, Matter 4

logistics and in particular, any requirements arising from the Heathrow OA in the London Plan 2021?

The Council's Employment Background Explanatory Note (Oct 2025) has been commissioned to provide an up-to-date calculation of employment land requirements, but there is very little mention of the logistics sector, except that there is a shortfall of floorspace in the Heathrow Opportunity Area. The airport is a global transport hub and crucial to the economy of the capital and the country and therefore further information is needed.

As noted above, the entirety of the Dairy Crest site should be allocated as LSIS, otherwise the Plan will not be in accordance with the London Plan, specifically Policies GG2 and SD1 that support the development of Brownfield sites in Opportunity Areas, especially where this creates employment opportunities.

9) Have any alternative options for the distribution of new employment development been considered? If so, what were they?

No comment.

10) Is the identification and boundaries of the Strategic Industrial Sites (SIL), Locally Significant Industrial Sites (LSIS), other existing industrial sites, Key Existing Office Locations (KEOL), Great West Corridor Creative Enterprise Zone and Strategic Outer London Development Centre - justified, consistent with national policy and in general conformity with the London Plan 2021?

Under draft Policy ED2, the Policy states that only 1.6ha of the Dairy Crest site should be allocated as a new LSIS. This is not in accordance with the approach of the NPPF or the London Plan. It is acknowledged that to meet the identified employment land over the Plan period, Green Belt sites will need to be released. However, all opportunities should be taken to first use brownfield and lower performing Green Belt sites.

This approach has not been taken in respect of the Dairy Crest Site.

The site is previously developed and is an existing employment site and therefore it should be allocated as LSIS in its entirety.

Paragraph 148 of the NPPF states the following (with our emphasis):

'Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.'

Hearing Statement, Matter 4

The whole Dairy Crest site should therefore be prioritised for development because it is previously developed land. While part of the site is currently overwashed by Green Belt, it meets the NPPF's glossary definition of Grey Belt land as well as the Grey Belt tests under paragraph 155 of the NPPF.

Excluding 2.2ha of the site from the LSIS allocation will limit the site's potential for intensification. Therefore, the draft Plan is at odds with Policies GG2, SD1, EC4 and EC7 of the London Plan, which encourages the development of previously developed land in Opportunity Areas, as well as the intensification and utilisation of existing employment land to make more efficient and effective use of sites.

Given that the whole site is previously developed land, excluding part of the site from development is also contradictory to paragraph 124 of the NPPF, which states that planning policies '*should promote the effective use of land*' including '*previously developed or brownfield land*'.

The Council approach is therefore not sufficiently robust, nor is it in accordance with policy objectives from the NPPF and the London Plan and cannot currently be considered to be sound.

11) Are the approaches in Policies ED1 and ED2 in terms of development proposals in SIL, LSIS, KEOL and other industrial and office sites – justified, effective, consistent with national policy and in general conformity with the London Plan 2021?

Further to the above response to question 10, draft Policies ED1 and ED2 fail to enable employment development in the effective way which is promoted by the NPPF. The LSIS allocation, excluding 2.2ha of the site is wasteful and not in accordance with paragraph 8a of the NPPF, which aims to '*build a strong, responsive, and competitive economy*' by ensuring that '*sufficient land*' is available in the right places for economic development. The allocation severs over half of the site, preventing the effective delivery of a high-quality employment premises.

Similarly, in the West of the Borough, where it is calculated that there is a deficit of 75,877 sqm of industrial floorspace, withholding 2.2ha of the site from LSIS allocation is not in keeping with paragraph 126 of the NPPF, which states that development plans should be written '*to bring forward land that may be suitable for meeting development needs*'. The land excluded from the allocation is currently hardstanding, accommodating the site's existing car parks, storage areas, service yards and small ancillary buildings. This land is therefore also suitable for employment buildings and should be included within the allocation.

By overlooking the economic objectives of the NPPF, the policy is also not aligned with the economic objectives for the capital. Notably, Policy GG5c of the London Plan states that London should '*plan for sufficient employment and industrial spaces in the right locations to support economic development*'. Draft Policies ED1 and ED2 do not take full advantage of the site's capacity and therefore the draft Development Plan currently passes up opportunities to address the Borough's industrial floorspace needs.

Overall, the failure of draft Policies ED1 and ED2 to comply with the economic development objectives of the NPPF and London Plan will mean that the draft Development Plan will not effectively deliver employment and industrial development in Hounslow.

Hearing Statement, Matter 4

12) 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 reprovision 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?

No comment.

13) Should the expectation that employment development coming forward on allocated sites comply with the minimum development quantum identified in the Plan also be linked to the design-led approach in London Plan Policy D3?

Yes, policy D3 should be taken into consideration in the development of employment sites. However, as currently drafted Policies ED1 and ED2 do not follow Policy D3. Excluding 2.2ha of the Dairy Crest site from development is at odds with the design-led approach of Policy D3, that seeks to optimise site capacity. The main requirement should be the re-use of employment sites and previously developed land, and then optimising the use of sites released from the Green Belt to support economic growth.

There is a risk that allocated sites may not be able to optimise their development potential, and this may then require the further release of land from the Green Belt in the future. The current London Plan policies relating to intensification of the use of employment land were required following the gradual reduction in employment land provision over previous years so the main objective should be making most effective use of existing and allocated sites to meet needs.

14) Is the approach of Policy ED2 with respect to co-location of industrial premises with residential development within part of the existing SIL within the Great West Corridor (West Cross Campus) and its proposed removal from the SIL - justified and in general conformity with London Plan Policies E5 and E7?

No comment.

Hearing Statement, Matter 4

15) Does the Plan appropriately account for circumstances where co-location of existing employment land may be suitable elsewhere? If not, why not?

No comment.

16) Are the requirements of Policy ED4 in terms of enhancing local skills, including the development proposals subject to the requirements, justified and effective?

No comment.

17) When having regard to the previous questions on employment and opportunity areas, is the approach to Green Belt and Metropolitan Open Land (MOL) release in the Policy SD1 (and elsewhere in the Plan) in general conformity with the London Plan 2021 and can the Council explain how it considers that exceptional circumstances have been demonstrated to justify Green Belt (and MOL) releases to meet both identified needs employment, with regard to each of the following considerations:

- a) Would as much use as possible be made of suitable brownfield sites and underutilised land that are not currently within the Green Belt (and MOL)?
- b) Would the density of development of employment sites that are not currently within the Green Belt (and MOL) be optimised?
- c) Has plan-making activity been informed by discussions with neighbouring authorities in its Functional Economic Market Area and/or which fall within the Heathrow OA about whether they could accommodate some of the need for development, as demonstrated through Statements of Common Ground?

No comment.

18) In the context of the above, is a 'comprehensive review' of Green Belt (and MOL) boundaries limited to only Hounslow Borough an appropriate and justified manner to identify any land required to address unmet needs for logistics, distribution and other activities associated with Heathrow Airport?

No comment.

19) 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) by:

Hearing Statement, Matter 4

- a) suitably identify the locations and appropriate scale of areas to be assessed?
- b) evaluating the contribution each assessment area makes to Green Belt purposes?
- c) considering whether applying the policies relating to areas or assets of particular importance in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development of the assessment area?
- d) identifying if the release or development of the areas assessed would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the Plan area?
- e) taking account of the intended permanence of Green Belt boundaries in the long term so they can endure beyond the Plan period? N.B. We intend to go on to address the detailed approaches to site allocations and site selection in the Plan separately during Stage 2 hearings, including the proposed areas to be released from Green Belt / MOL and Policy P2(c).

In terms of 'areas not otherwise proposed to be released' by the draft Plan, the Green Belt Background Paper (June 2025) provides no assessment of the Green Belt land at the Dairy Crest site. The Background Paper refers to previous Green Belt Reviews, but these consider the site as part of a much larger parcel, and these reviews also pre-date the new approach to Grey Belt now set out in the NPPF.

A thorough and up-to-date assessment of the Dairy Crest site would identify the following:

- The site is bound by physical features, including the existing access road off Snakey Lane;
- The site is partially enclosed by existing development, including the water treatment works to the south and existing commercial and residential development to the north;
- The site contains existing development, including the former bottling plant buildings (operated by Muller Dairies) along with its associated car parks, storage areas, service yards and small ancillary buildings;
- Because of the site's surroundings and existing development, its redevelopment would not result in an incongruous pattern of development. Reviewing aerial and historical photographs of the site show that it has long been embedded in the local urban landscape;
- Development of the site would not substantially reduce the existing gap, which is almost entirely covered by buildings or hardstanding, between the towns of Feltham and Sunbury-on-Thames;
- The site does not form part of the setting of an historic town.

Assessments by the Council should have therefore determined that the site makes a weak contribution towards the Green Belt's purposes and that development would not fundamentally undermine these purposes.

In support of the site's case for release, and in accordance with paragraph 155 of the NPPF, which establishes the test for Grey Belt development, the site is also in a sustainable location. There are two bus routes with stops next to the site, which provide journeys to local destinations while a shared pedestrian and cycleway also runs past the site, with routes to surrounding neighbourhoods. The site is also in walking distance of Kew train station.

Hearing Statement, Matter 4

Given Hounslow's shortfall of industrial land, it is considered that the Borough's Green Belt Background Paper (June 2025) is insufficient, as it fails to identify that the site is suitable for release as previously developed land and Grey Belt.

20) The evidence in the Green Belt Background Paper - incorporating Exceptional Circumstances Assessment June 2025 (EBGB1) indicates that sites proposed to be released from the Green Belt would be expected to contribute towards compensatory improvements to remaining Green Belt land. Are the relevant policies of the Plan (Policies GB1, P2 and P2(c)) justified and effective in terms of the expectations of development proposals in those respects?

It is not considered that these policies are justified. The Green Belt's purpose is to remain open. The openness of these areas cannot be enhanced, so this approach is not considered to be sound. The release of the land from the Green Belt is to meet development needs, development will need to meet the other statutory and policy requirements such as the provision of 10% BNG. For sites in the Green Belt, securing development and complying with the statutory provision for BNG can be costly and so further compensation of nearby land could affect the viability of development, even though this has been identified as meeting a specific need. It does not appear that such unintended consequences have been fully assessed in any detail.

21) Without prejudice to our consideration of responses to Questions 17 to 19, is the proposed approach of designating land to be released from the Green Belt as LSIS justified and in general conformity with the London Plan 2021?

No comment.

22) Is the expectation in Policy GB1 that development proposals maintain the openness, setting and visual amenity where it is near the Green Belt and MOL – justified and consistent with national policy?

No comment.